

A black and white photograph of a rugged mountain range. The foreground shows a rocky, snow-dusted slope. In the middle ground, several sharp, jagged mountain peaks are visible, some with patches of snow. The sky is dark and cloudy. The overall scene is dramatic and emphasizes the scale and beauty of the wilderness.

Denali National Park and Preserve Final Backcountry Management Plan

General Management Plan Amendment Environmental Impact Statement January 2006

Denali National Park and Preserve Final Backcountry Management Plan

General Management Plan Amendment and Environmental Impact Statement January 2006

Produced by Denali National Park and Preserve
National Park Service

U.S. Department of the Interior
Denali Park, Alaska

Abstract: This *Final Backcountry Management Plan, General Management Plan Amendment, and Environmental Impact Statement (Final EIS)* provides specific direction for backcountry management for Denali National Park and Preserve for the next 20 years. This plan will update and expand the 1976 *Backcountry Management Plan* and will amend the 1986 *General Management Plan* for Denali National Park and Preserve. The plan addresses management of all park and preserve areas not included in the 1997 *Entrance Area and Road Corridor* and the 1997 *South Side Denali Development Concept Plans*, including the designated wilderness in the former Mount McKinley National Park, the national park additions, the northwest and southwest national preserve areas, and the park road corridor west of park headquarters during the winter season. The *Final EIS* follows a *Draft EIS* published in February 2003, and a *Revised Draft EIS* published in April 2005. It presents a modified version of the preferred alternative from the *Revised Draft EIS* and an analysis of its environmental consequences. It also provides a summary of the other alternatives considered and their environmental consequences. The complete text of those alternatives can be found in the *Revised Draft EIS*.

Further information may be obtained at the following address:

Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali Park, Alaska 99755
(907) 683-2294
DENA_BC Plan_Comment@nps.gov

Executive Summary

This document is a *Final Backcountry Management Plan, General Management Plan Amendment, and Environmental Impact Statement (Final EIS)*. It follows an original *Draft Backcountry Management Plan and EIS (Draft EIS)* published in February 2003 and a *Revised Draft Backcountry Management Plan and EIS (Revised Draft EIS)* published in April 2005. The *Final EIS* makes several adjustments to the preferred alternative of the *Revised Draft EIS*, but retains that alternative's essential elements and strategies.

This document does not reprint all of the information from the *Revised Draft EIS*. It contains the entirety of the Purpose and Need (chapter 1), the modified preferred alternative (chapter 2), and an analysis of impacts of that alternative (chapter 4). It also contains a summary comparison of the modified preferred alternative with the alternatives previously presented. Factual corrections to the Affected Environment (chapter 3) and the Appendices are presented as Errata sheets following the Final Action. The entirety of the chapter on Consultation and Coordination (chapter 5) and the Section 810 evaluation and findings of potential restrictions to subsistence activities (appendix C) are also reprinted with modifications. Unmodified portions of the *Revised Draft EIS* are incorporated into the *Final EIS* by reference.

Purpose and Need

The goal of the backcountry management plan is to describe how the National Park Service will act to provide future generations with a variety of opportunities to experience the Denali backcountry while protecting park wildlife and other natural resources, wilderness resource values, and subsistence resources. This plan will update and expand the 1976 *Backcountry Management Plan* and, once approved by a Record of Decision, will amend the 1986 *General Management Plan* for Denali National Park and Preserve. This plan will also serve as a *Soundscape Preservation and Noise Management Plan* as required by NPS Director's Order 47, a *Wilderness Management Plan* as required by NPS Director's Order 41, and a *Commercial Services Plan* for the backcountry.

This new plan addresses management of all park and preserve lands, except the park road corridor and adjacent development zones and backcountry day use areas, which were addressed in the 1997 *Entrance Area and Road Corridor Development Concept Plans (DCP)*. The study area also includes the park road corridor west of park headquarters during the winter season. Some actions do affect the development and backcountry day use areas delineated in the 1997 *Entrance Area and Road Corridor Development Concept Plans*; the new actions proposed in this plan, however, are consistent with the *Entrance Area and Road Corridor DCP* and the 1997 *South Side Denali DCP*. The plan is intended to guide decision-making for the backcountry areas of Denali for 20 years.

There are four reasons why a new backcountry management plan is needed at this time, identified as planning issues during project scoping.

- The 1976 backcountry planning document predated the 1980 Alaska National Interest Lands Conservation Act, and the park’s 1986 General Management Plan did not provide detailed guidance about managing backcountry uses in the park additions.
- Visitation has grown dramatically for some backcountry activities, requiring new methods of management.
- Anticipated increases in additional activities are expected in the next 20 years.
- Changes in backcountry use require National Park Service action to protect park resources and wilderness character.

Specifically, actions described by this plan should

- protect and preserve the park’s natural and cultural resources, including natural soundscapes and subsistence opportunities;
- protect and preserve the park’s wilderness resource values, including its wilderness character and outstanding opportunities for solitude;
- provide for the public’s freedom of use and enjoyment of the park’s backcountry and wilderness in a manner that is consistent with park purposes and the protection of park resources and values;
- protect and provide opportunities for wilderness recreational activities in the backcountry, including reasonable access; these recreational opportunities should be defined within the context of a spectrum of recreational opportunities available on lands managed by public agencies in the Denali region (primarily state parks, other state lands, and federal Bureau of Land Management lands);
- ensure all National Park Service management practices and research activities in the backcountry are consistent with park purposes; and
- provide for the means to achieve public understanding and support of backcountry and wilderness values.

The purpose and need for the plan are explained fully in chapter 1.

Alternatives

The *Revised Draft EIS* included a no-action alternative and four action alternatives. This document describes the modified preferred alternative and summarizes the other four alternatives. A summary of all the alternatives appears in Table 2-14. The following topics are addressed.

- 1) Management Areas: This topic includes descriptions of visitor experience and resource protection goals for various parts of the backcountry. These goals are presented through the articulation and allocation of “management areas” that are defined by indicators and quantitative standards.
- 2) Access Management: This topic addresses strategy, tools, and specific prescriptions for managing motorized and non-motorized recreational access to the park and preserve.
- 3) Wilderness Management: This topic addresses a guiding philosophy for wilderness management at Denali consistent with law, policy, and the park’s specific history. It includes several specific measures to protect wilderness

- resources and wilderness recreational opportunities, including guidance on group size, human waste disposal, and climbing tools.
- 4) Commercial Services Planning: This topic includes descriptions of the appropriate type, locations, and scale of commercial services in the backcountry including both transportation and guide services. Guided hiking, air taxi, scenic air tour, and guided sport hunting services are specifically addressed.
 - 5) Backcountry Facilities: This topic identifies appropriate types of and locations for backcountry facilities – including trails, designated campsites, sanitation facilities, cabins and shelters, and information facilities – as well as proposing specific new facilities. This topic also includes winter management of the park road corridor west of Park Headquarters.
 - 6) Administrative and Scientific Activities: This topic addresses the management of administrative and scientific activities to protect resource values of the backcountry. It covers administrative camps, information and education, aviation, research, and resource management.
 - 7) Easements and Boundary Changes: This topic includes a proposed land exchange in the Tokositna and Coffee Rivers area and a strategy for addressing a stranded public access easement in the Cantwell/Windy Creek area that is intended to provide access to the park boundary.

Each alternative of the *Revised Draft EIS* represented a distinct vision for the Denali backcountry and proposed a set of actions under the seven topic categories which would result in achievement of the vision. Based on public comment, the *Final EIS* presents the following vision as the preferred alternative:

This backcountry management plan would guide the National Park Service in providing opportunities for a variety of wilderness recreational activities and experiences while recognizing and protecting the premier wilderness resource values of the entire backcountry. Areas in the Dunkle Hills and around the Ruth and Tokositna Glaciers on the south side of the Alaska Range would be managed for those visitors who want to experience the wilderness resource values or other resource values of the Denali backcountry but require services or assistance, or who are unable to make a lengthy time commitment. Areas along the park road in the Old Park and the Kantishna Hills would provide accessible opportunities for short- or long-duration wilderness recreational activities with only limited options for guidance or assistance the farther one gets from the park road. The remainder of the backcountry would be managed for dispersed, self-reliant travel, and would include opportunities for extended expeditions in very remote locations.

Environmental Consequences

Following the modified preferred alternative is an analysis of environmental consequences of that action. This analysis evaluates the magnitude of impacts and how these impacts compare to current conditions. The cumulative impact assessment outlines overall impacts resulting from past, current, proposed, and reasonably foreseeable management and other actions. Table 2-15 compares the conclusions of the analysis for the Final Action to the conclusions of the action alternatives presented in the *Revised Draft EIS*.

The National Park Service considered in detail 10 categories for analysis, including park resources, recreational opportunities, and park operations. These were:

- Soils (particularly ice-rich permafrost soils)
- Vegetation
- Fish and wildlife
- Natural soundscapes
- Wilderness
- Subsistence
- Cultural resources
- Socioeconomics
- Recreational opportunity and visitor safety
- Park management and operations

By providing for growth in recreational activities that require services or assistance, the preferred alternative would constrain some opportunities for wilderness-dependent activities in accessible areas and produce minor benefits to recreational opportunities overall. There would be a negligible change in impacts to wilderness and natural soundscape resources, although locations of impacts in the park would shift. Minor adverse impacts would occur to ice-rich permafrost soils, minor to moderate adverse impacts to wildlife and subsistence resources and opportunities, and moderate adverse impacts to vegetation. This alternative would provide little overall mitigation for past actions, so there would still be cumulative major adverse impacts to such resources as wilderness and natural soundscapes.

The impacts of the modified preferred alternative are compared to the impacts of the other four alternatives of the *Revised Draft EIS* in Table 2-15.

TABLE OF CONTENTS

Executive Summary	iii
Chapter 1: Purpose and Need	1
Summary	1
Final Backcountry Management Plan	1
Summary of Changes	2
Purpose, Need, Background	4
Management Goals	12
Applicable Laws, Regulations, and Policies	13
Planning Issues Considered But Not Addressed	26
Impact Topics	29
Chapter 2: Alternatives	33
Introduction	33
Overview	33
Management Areas	34
Access	46
Wilderness Management	50
Commercial Services	53
Backcountry Facilities	56
Administrative and Scientific Activities	57
Easements and Boundary Changes	58
Implementation	59
Alternatives Considered but Rejected	61
Summary Table of Alternatives	63
Summary Table of Environmental Consequences	76
Chapter 3: Affected Environment	89
Errata	89

Chapter 4: Environmental Consequences	93
Methodology	93
Assumptions	96
Background for Analysis of Cumulative Affects	98
Ice-Rich Permafrost Soils	103
Vegetation	106
Wildlife	114
Natural Soundscapes	125
Wilderness Resources	135
Subsistence Resources and Opportunities	142
Cultural Resources	149
Socioeconomics	151
Recreational Opportunity and Visitor Safety	157
Park Operations and Management	164
Sustainability	167
Chapter 5: Consultation and Coordination	169
Public Involvement	169
Consultation with Federal Agencies	170
Consultation with State and Local Governments	171
Consultation with Native Tribal Governments	172
Additional Consultation	172
List of Agencies/Organizations/Businesses	173
Chapter 6: Public Comments and Response	179
Characterization of Comments Received	179
Response to Comments	182
Appendices	357
Bibliography-Errata	357
Appendix C: ANILCA Section 810(a) Summary of Evaluations and Findings	358

Maps

Chapter 1

1	Study Area	8
---	------------	---

Chapter 2

2	Management Areas – Alternative 4 – Modified (NPS Preferred)	81
3	Corridors – Alternative 4 – Modified (NPS Preferred)	82
4	Portals	83
5	Hunting Guide Areas	84
6	Cantwell-Windy 17(b) Easement	85
7	Land Exchange	86

Tables

Chapter 2

2-1	Management Area Descriptions	36
2-2	Trail and Campsite Disturbance	39
2-3	Evidence of Modern Human Use	40
2-4	Litter and Human Waste	40
2-5	Natural Sound Disturbance	41
2-6	Encounters with People	42
2-7	Camping Density	43
2-8	Accessibility	43
2-9	Administrative Presence	44
2-10	Area of Park and Preserve by Management Area	44
2-11	Access Management Tools	47
2-12	Decision Guide for Addressing Social Trail Formation	49
2-13	Implementation Actions	59
2-14	Summary Table of Alternatives	63
2-15	Summary Table of Environmental Consequences	76

Chapter 4

4-1	Percentage of Sample Hours, Days, or Events which Measured Condition Exceeds Standard, by Location and Management Area	127
4-2	Number of Overflight Events by Intensity Rating	129
4-3	Average Number of Aircraft Seen Per Trip Day by Percent of Hiking Parties	129



CHAPTER 1: PURPOSE AND NEED

SUMMARY

This *Final Backcountry Management Plan, General Management Plan Amendment, and Environmental Impact Statement* provides specific direction for backcountry management and guides backcountry management decisions for Denali National Park and Preserve for the next 20 years. Existing management plans do not adequately cover the extensive areas added to the park by the Alaska National Interest Lands Conservation Act of 1980 (ANILCA), nor do they address many of the current visitor experience, resource protection, and user conflict issues. The goal of the backcountry management plan is to describe how the National Park Service will act to provide future generations with a variety of opportunities to experience the park backcountry while protecting park wildlife and other natural resources, wilderness resource values, and subsistence resources. Proposed National Park Service actions are guided by established laws and policies, such as the National Park Service Organic Act, Mount McKinley National Park enabling legislation, the Wilderness Act, ANILCA, and National Park Service Management Policies. The plan also responds to public concerns identified during project scoping, public comments made during the National Environmental Policy Act (NEPA) review process, and the social and environmental impacts identified as part of NEPA review.

FINAL BACKCOUNTRY MANAGEMENT PLAN

This document is a *Final Backcountry Management Plan, General Management Plan Amendment, and Environmental Impact Statement (Final EIS)*. This document follows an original *Draft Backcountry Management Plan and Environmental Impact Statement (Draft EIS)* published in February 2003 and a *Revised Draft Backcountry Management Plan and Environmental Impact Statement (Revised Draft EIS)* published in April 2005. The *Revised Draft EIS* substantially changed the actions in the plan alternatives in response to public comment on the original draft. These changes were significant enough to merit a new round of public review before publication of the *Final EIS*. This *Final EIS* makes several adjustments to the preferred alternative of the *Revised Draft EIS*, but retains the essential elements and strategies of that alternative.

To enhance public understanding of the changes to the *Revised Draft EIS*, this *Final EIS* does not reprint all of the information from the draft. This document highlights those areas of importance for understanding the new preferred alternative and its impacts, and contains all of the changes made throughout the plan. Unmodified portions of the *Revised Draft EIS* are considered to be an integral part of this *Final EIS*, and readers should refer to that draft as appropriate. An itemization of the important components of the *Final EIS* is as follows:

Chapter 1, Purpose and Need	Entire chapter is in this document.
Chapter 2, Alternatives.....	Modified preferred alternative is in this document along with a summary table comparison to other alternatives (Table 2-14). Refer to <i>Revised Draft EIS</i> for full description of other alternatives.
Chapter 3, Affected Environment	Errata sheet with changes from <i>Revised Draft EIS</i> is in this document; otherwise refer to <i>Revised Draft EIS</i> .
Chapter 4, Environmental Consequences.....	Marked-up version of the impact analysis for the modified preferred alternative is in this document along with a summary table comparison to consequences of other alternatives (Table 2-15). For the full analysis for other alternatives refer to the <i>Revised Draft EIS</i> .
Chapter 5, Consultation and Coordination....	Entire chapter is in this document.
Chapter 6, Comments and Responses	Comments and responses on the <i>Revised Draft EIS</i> are in this document. For comments and responses on the original <i>Draft EIS</i> , refer to appendix A of the <i>Revised Draft EIS</i> .
Appendices.....	Bibliography mark-ups and the entirety of Appendix C, ANILCA Section 810(a) Summary of Analysis and Findings are in this document. Other appendices are found in the <i>Revised Draft EIS</i> .

SUMMARY OF CHANGES BETWEEN THE REVISED DRAFT EIS AND THE FINAL EIS

The National Park Service received 15,198 comments on the *Revised Draft EIS* of the Denali Backcountry Management Plan, compared to 9,370 comments received on the original draft. Chapter 6 contains a characterization of comments received, copies of representative substantive comments, and the NPS responses to those comments. In some cases, the National Park Service made changes to the preferred alternative in order to respond to public interest and new information. The major differences between the modified preferred alternative of the *Final EIS* and the preferred alternative of the *Revised Draft EIS* are as follows:

Management Areas

- Indicators and standards were added for the populations, demographics, and distributions of major wildlife species.
- The southern Kantishna Hills and the southern park additions between Cantwell Creek and Bull River were changed from Management Area A to Management Area B.
- A portion of the northern park additions east of the McKinley River was changed from Management Area D to Management Area B.

- The Buckskin and Coffee Glacier valleys were changed from Management Area A to a combination of Management Area C in the glaciated portions and Management Area B in the lowland areas.
- The suggested third Major Landing Area on the southwest fork of the Kahiltna Glacier was removed.
- The Muddy and Kantishna River Corridor was designated for summer season only. The Corridors on the Yentna River were removed, as was the summer season Corridor on Eldorado Creek in Kantishna.
- The winter season Corridors in the southern park additions were authorized but would not be implemented until there is sufficient demand. These Corridors were shortened in the Tokositna River area.
- The “Low” standard for Encounters with People was changed from “3 or fewer parties per week” to “visitors are unlikely to encounter other parties in these areas.”

Wilderness Management

- A clarification was made that maximum group size in Management Areas OP2 and D would be six.

Commercial Services

- The hierarchy for guided services and educational programs was removed and replaced with a statement indicating that National Park Service and Murie Science and Learning Center activities would have a priority for available backcountry capacity where such capacity is limited.
- Definitions of scenic air tours and air taxis were clarified.
- The restriction that would prohibit scenic air tours from landing on the Pika or Eldridge Glaciers when climbers or mountaineers are present was modified. Scenic air tour landings may take place when climbers are present, but those landings are subject to management area standards, cannot occur when other landing locations are available, and are discouraged when climbers are present.
- Guided day-hiking in the Old Park would be restricted to areas west of Toklat River with access from Kantishna, plus the guided hiking in the Wonder Lake area authorized by the *Entrance Area and Road Corridor DCP*.

Backcountry Facilities

- The trail suggested in Alternative 5 from Eielson Bluffs to Thorofare River was added to the *Final EIS*. The Wildhorse Creek trail was removed.
- The language from Alternative 3 regarding plowing the park road in winter was adopted in the *Final EIS*, so snow would not be removed from the road until necessary to prepare for summer use.

Administrative and Scientific Activities

- The requirement to develop management area-specific criteria for research and resource management activities was removed in favor of a requirement to obtain research permits. The process for Alaska Department of Fish and Game management activities was also clarified.

PURPOSE OF PLAN

The goal of the backcountry management plan is to describe how the National Park Service will act to provide future generations with a variety of opportunities to experience the Denali backcountry while protecting park wildlife and other natural resources, wilderness resource values, and subsistence resources. This plan will update and expand the 1976 *Backcountry Management Plan* and, once approved by a Record of Decision, will amend the 1986 *General Management Plan* for Denali National Park and Preserve. The 1997 *Entrance Area and Road Corridor Development Concept Plan* (DCP) and the 1997 *South Side Denali Development Concept Plan* also amended the 1986 *General Management Plan*. This plan will also serve as a *Soundscape Preservation and Noise Management Plan* as required by NPS Director's Order 47, as a *Wilderness Management Plan* as required by NPS Director's Order 41 (see appendix B), and as a *Commercial Services Plan* for the backcountry.

This new plan addresses management of all park and preserve lands, except the park road corridor and adjacent development zones and backcountry day use areas, which were addressed in the 1997 *Entrance Area and Road Corridor Development Concept Plan*. The study area also includes the park road corridor west of park headquarters during the winter season. Some actions do affect the development and backcountry day use areas delineated in the 1997 *Entrance Area and Road Corridor Development Concept Plan*; the new actions proposed in this plan, however, are consistent with the *Entrance Area and Road Corridor* DCP and the *South Side Denali* DCP. The study area for this plan is shown in Map 1. The study area includes congressionally designated wilderness and lands determined suitable for wilderness designation.

The National Park Service has prepared this environmental impact statement to evaluate the potential environmental impacts of the proposed backcountry management plan alternatives and to inform and seek input from the public, regulatory agencies, and other interested parties. The environmental impact statement findings and public comment will form the basis for a decision by the NPS Regional Director for Alaska on the final *Backcountry Management Plan and General Management Plan Amendment*. Implementing the plan may require promulgation of special regulations and public advisories in consultation with other federal and state agencies and the public. This environmental impact statement has been prepared according to the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR Part 1500).

This amendment to the *General Management Plan* does not change the fundamental purposes of the park as established in law and policy. Throughout the history of the park, management decisions have been oriented to the preservation of wilderness character and other wilderness resource values. There has also been an emphasis on protecting the park's intact natural ecosystem. This plan will retain that consistency in management but will introduce new ideas for addressing the issues of today and those anticipated in the next 20 years.

NEED FOR PLAN

There are four reasons why a new backcountry management plan is needed at this time, identified as planning issues during project scoping.

1) The 1976 backcountry planning document predated ANILCA, and the 1986 GMP did not provide detailed guidance about managing backcountry uses in the park additions.

As a result, there is a well-defined system for managing backcountry use in the former Mount McKinley National Park (the Old Park), but only a small portion of the ANILCA park additions have been incorporated into that management framework. In addition, ANILCA designated most of the Old Park as wilderness under the Wilderness Act and included provisions for special access that have never been addressed in backcountry planning.

2) Visitation has grown dramatically for some backcountry activities, requiring new methods of management.

Since 1986, general growth in the tourism industry statewide has brought more pressure for comfortable, convenient, and predictable access to Alaska's wild lands. The resident population of Alaska has grown more than 50 percent since 1980, providing a much larger year-round demand for recreational opportunities on the public lands. Twenty years ago the relatively few recreational users of the public lands were sparsely spread over a vast area, but today – particularly in areas that are accessible from the state road system – the use is much more dense, creating concerns about damage to resources and generating conflicts among different user groups. For many locations and activities, the National Park Service has little information about the extent and character of use. Laws, regulations, and agency management policies require the National Park Service to manage recreational and other uses to protect resources and to minimize conflicts among park users.

Specific issues identified during scoping include the following:

Aircraft Overflights and Airplane Landings: Scenic air tours and concession-permitted airplane landings have increased dramatically since the 1986 GMP was completed. Helicopter and fixed-wing aircraft encounters are a common occurrence in all of the popular hiking areas, particularly south of the park road along the flank of the Alaska Range and in glaciated areas around Mount McKinley. Airplanes making landings on Alaska Range glaciers – once primarily a way to transport mountaineers – now account for almost 3,000 landings a year; and more than two-thirds of those landings are brief stops with scenic tour passengers.

Aircraft are an important means of visitor access to remote areas of the Denali backcountry, but overflights and landings, generally unrestricted by management plans in effect, have resulted in substantial changes in the natural sound environment

and generated new conflicts with park users on the ground beneath flight corridors. Commercial jets traveling across the park, military flights in a Military Operations Area south of the Alaska Range, and NPS administrative use of aircraft also contribute to these issues.

Snowmachine (Snowmobile) Use: Recreational snowmachine use was very limited at the time of the 1986 GMP. Since then improved technology has extended the range of the machines and the terrain they are capable of traversing, so that snowmachine use is now widespread in the southern park additions and growing rapidly. Snowmachines can be an important means to access remote backcountry areas, but conflicts with other users, especially non-motorized winter recreationists and subsistence users, are increasing, and concerns have been raised about the effects of snowmachine use on wildlife, vegetation, water quality, air quality, natural soundscapes, and other park resources. There are currently few guidelines for managing use.

Hiking and Backpacking: The numbers of participants in backcountry park activities such as hiking are growing because of larger numbers of visitors. There are many more seasonal workers in the area who often use the park backcountry during their leisure time. Lodges in the Kantishna Hills are providing a much broader range of options for their guests than those available 15 years ago.

Climbing and Mountaineering: The number of climbers on Mount McKinley has doubled in the last 20 years. As climber numbers continue to rise, crowding on technical sections of popular routes, such as the fixed lines section of the West Buttress, could jeopardize visitor safety. Congestion at campsites also raises questions about the quality of the experience within this part of the Denali Wilderness, and the level of use has created a substantial human waste management concern. Several climbing areas in the park additions, such as Little Switzerland and the Eldridge Glacier, are becoming new popular destinations for climbers and mountaineers, leading to concerns about human waste and eventual crowding in those locations.

Guided and Commercial Uses: Increasing visitation has led to significant increases in demand by businesses and non-profit organizations to offer guided activities. The new Murie Science and Learning Center is bringing additional groups of visitors into the park for research and educational activities. The National Park Service has no management plan that describes the kind and level of guided and commercial uses appropriate in the Denali backcountry.

3) Anticipated increases in additional activities are expected in the next 20 years.

The National Park Service needs to act to anticipate changes in use. Off-road bicycle use, motorboat access, and pack animal use are activities that presently occur at minimal levels, but for which interest could increase at any time just as interest in snowmachine use increased during the 1990s. Non-motorized winter recreational use (skiing, skijoring, snowshoeing, and dog mushing) has been modest, but also has potential for growth. This plan needs to provide guidance for managing these uses.

4) Changes in backcountry use require National Park Service action to protect park resources and wilderness character.

Underlying the need to manage visitor activities in the backcountry is the NPS responsibility to protect park resources and values. These include wildlife, vegetation, natural ecological relationships, natural sounds, and wilderness resource values. The changes in both visitor activities and administrative activities in the backcountry need to be managed to ensure these values are not compromised. Present plans do not adequately address these topics, particularly in the 1980 park additions and preserve, nor do they address resources that have only recently been identified as threatened, such as the park's natural soundscape.

BACKGROUND

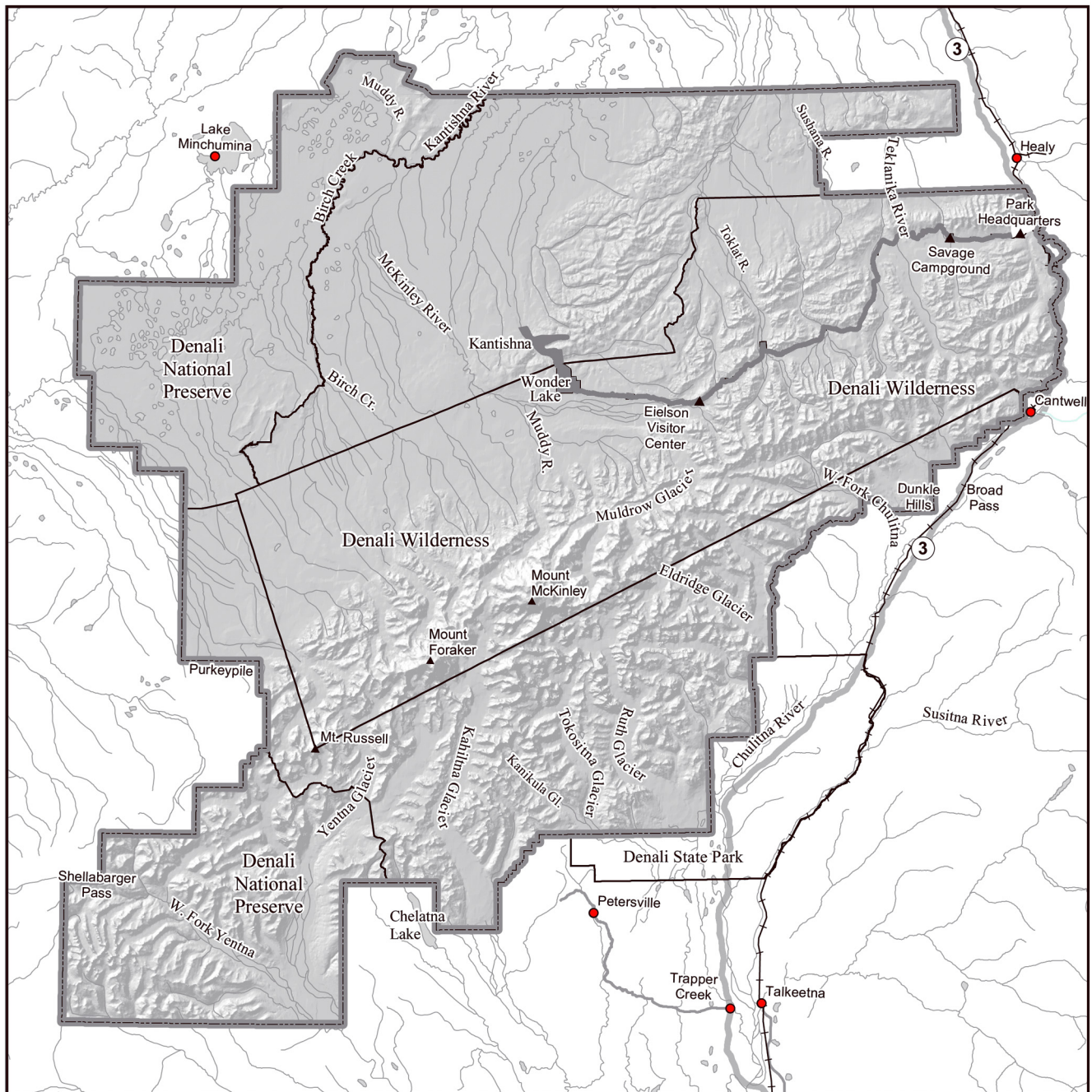
Congress designated the original Mount McKinley National Park and the larger Denali National Park and Preserve for specific purposes as described in law. The park was created by Congress because it had particular significance – qualities that make it a superlative example of the natural, cultural, and wilderness landscapes of the United States.

Park Purpose

The purpose of Denali National Park and Preserve has evolved from the time Congress established the original Mount McKinley National Park to the present and has increased in complexity because of the different mandates that apply to the Old Park (the original Mount McKinley National Park), the national park additions (added by ANILCA), the national preserve (also added by ANILCA), and the designated wilderness (covering most of the Old Park).

Mount McKinley National Park (Old Park)

In 1917 Congress established Mount McKinley National Park as a “game refuge” to “set apart as a public park for the benefit and enjoyment of the people ... for recreation purposes by the public and for the preservation of animals, birds, and fish and for the preservation of the natural curiosities and scenic beauties thereof ...” (39 Stat. 938).



- Legend**
- Study Area
 - Study Area
- Winter Season Only
 - Railroads



Map 1
Study Area
Backcountry Management Plan



Denali National Park and Preserve

In 1980 Congress passed the Alaska National Interest Lands Conservation Act (ANILCA, 16 USC §§ 3101-3233, Pub. L. 96-487), which enlarged and renamed the park Denali National Park and Preserve. Section 101 of ANILCA describes the broad purposes of the new conservation system units throughout Alaska, including enlarged national parks and preserves such as Denali. These are the following:

- Preserve lands and waters for the benefit, use, education, and inspiration of present and future generations.
- Preserve unrivaled scenic and geological values associated with natural landscapes.
- Maintain sound populations of, and habitat for, wildlife species.
- Preserve extensive, unaltered ecosystems in their natural state.
- Protect resources related to subsistence needs.
- Protect historic and archeological sites.
- Preserve wilderness resource values and related recreational opportunities such as hiking, canoeing, fishing, and sport hunting.
- Maintain opportunities for scientific research in undisturbed ecosystems.
- Provide the opportunity for rural residents engaged in a subsistence way of life to continue to do so.

Section 202 stated that the Denali National Park and Preserve additions are to be managed for the following additional specific purposes:

- To protect and interpret the entire mountain massif and the additional scenic mountain peaks and formations.
- To protect habitat for, and populations of fish and wildlife, including, but not limited to, brown/grizzly bears, moose, caribou, Dall sheep, wolves, swans, and other waterfowl.
- To provide continued opportunities, including reasonable access, for mountain climbing, mountaineering, and other wilderness recreational activities.

Denali Wilderness

Section 701 of ANILCA designated the “Denali Wilderness of approximately one million nine hundred thousand acres” under the Wilderness Act as depicted on a map referenced in Section 202 of ANILCA and including 99% of the former Mt. McKinley National Park. According to the Wilderness Act, these lands are to be “administered for the use

and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness.”

Denali National Preserve

Section 1313 of ANILCA addresses the purpose of national preserves created by the act.

A National Preserve in Alaska shall be administered and managed as a unit of the National Park System in the same manner as a national park except as otherwise provided in this Act and except that the taking of fish and wildlife for sport purposes and subsistence uses, and trapping shall be allowed in a national preserve under applicable State and Federal law and regulation.

Park Significance

Large Protected Area. Denali National Park and Preserve encompasses a vast six million acre area, about the size of the state of New Hampshire. Most of the two million acres of the original park has been in protected status since 1917. This large size enables a spectacular array of flora and fauna to live together in a healthy natural ecosystem and provides excellent opportunities to study subarctic ecosystems in settings largely undisturbed by humans. Because of these values, the United Nations Man and the Biosphere Program designated the park and preserve to be an International Biosphere Reserve.

Mountains and Glaciers. The park contains a major portion of the Alaska Range, one of the great mountain uplifts in North America. The Alaska Range is dominated by North America’s highest peak, Mount McKinley, with its summit at 20,320 feet above sea level. Towering 18,000 feet above the adjacent lowlands, the mountain’s dramatic vertical relief rivals any other mountain in the world, exceeding the vertical relief of Mount Everest measured from base to summit. A number of large glaciers originate in the park’s high mountains, including some of the largest in North America.

Wildlife and Habitat. The park was originally established in 1917 as a refuge for large mammals. Backcountry visitors and visitors traveling along the park road often observe Dall sheep, caribou, wolf, grizzly bear, moose, and fox. While populations fluctuate, nowhere else in America can such concentrations of these large species of wildlife be observed in as accessible a natural setting. The park is also significant for its diverse avian habitat that attracts birds from all over the world. The park’s rich and varied vegetation includes alpine tundra, shrub-scrub tundra, mixed spruce-birch and spruce-tamarack woodlands, taiga, wetlands, and extensive riparian and lowland forest areas. Denali has more than 10,000 mapped lakes. More than 753 species of flowering plants inhabit the slopes and valleys of the park.

Scenic Resources and Air Quality. Outstanding views of natural features, including mountains, glaciers, faults, and rivers dominate the park landscape. On a clear day, Mount McKinley can be seen from Anchorage, more than 130 air miles to the south. The

exceptional air quality in Alaska and the lack of city lights near the park provide the conditions for outstanding daytime views year-round and excellent night sky visibility in fall, winter, and spring. Denali National Park and Preserve is a designated Class I airshed under the Clean Air Act Amendments.

Cultural Resources. There are 257 known cultural resource sites within Denali's boundaries, including both prehistoric and historic sites. Because cultural resource inventories have been limited to date, this number likely represents a small fraction of the park's total sites. Known resources include archeological and historic sites associated with Athabascan Indian groups, early explorers, mining history, and the early days of the park. Major prehistoric sites in the park include the Teklanika Archeological District, a property listed on the National Register of Historic Places. Many historic structures are in the park headquarters area, which is listed on the National Register of Historic Places as a district, and on the boundaries of the Denali Wilderness (along the original park boundary). These are mainly patrol cabins and other structures dating back to early years of park management. Historic mining activity dates back to the early 1900s in the Kantishna Hills (which includes the national register-eligible Kantishna Historic District), the Stampede area, and the Dunkle Hills near Cantwell.

Mountaineering. Because it is the highest peak in North America, has a high northern latitude location, and is relatively accessible, Mount McKinley is considered one of the world's premier mountaineering destinations, drawing climbers from many countries. It is touted as one of the "seven summits of the world." Many other peaks in the park, including Mount Foraker, also offer outstanding expeditionary climbing opportunities.

Wilderness Recreation. Denali offers superlative opportunities for primitive wilderness recreation. Outstanding cross-country hiking, backcountry camping, and winter touring possibilities are available for those willing to approach the area in its natural condition. This huge park contains large areas with almost no trails and where evidence of human use is minimal to nonexistent. These conditions are in contrast to most wilderness areas in the contiguous 48 states where maintained trails, designated campsites, footbridges, and signs are standard. These conditions also contrast with much of Alaska, where similar opportunities abound, but are very difficult to reach. A large portion of Denali's backcountry is readily accessible to visitors who can reach the park by either highway or railroad from either Anchorage or Fairbanks – Alaska's two largest cities and major connection points for out-of-state visitors.

MANAGEMENT GOALS

General Vision

The National Park Service will preserve outstanding opportunities to view wildlife and mountain scenery, to experience wilderness, and to study wildlife, habitat, and ecosystem patterns and processes in the backcountry of Denali National Park and Preserve. Denali will retain its unique status as a park that offers an undeveloped Alaskan wilderness park experience distinct from the wilderness and park experience in the other states, while being more accessible than most national parks in Alaska because of the adjacent highway system and interior park road. In order to preserve the park's character and unique recreational opportunities, the National Park Service will seek to provide recreational opportunities in the Denali backcountry that are compatible with the unique resources and values for which the park was established. Other recreational activities can occur on adjacent lands that possess excellent wildland qualities but also have broader management mandates that are more appropriate for some uses.

Objectives

Specifically, actions described by this plan should

- protect and preserve the park's natural and cultural resources, including natural soundscapes and subsistence opportunities;
- protect and preserve the park's wilderness resource values, including its wilderness character and outstanding opportunities for solitude;
- provide for the public's freedom of use and enjoyment of the park's backcountry and wilderness in a manner that is consistent with park purposes and the protection of park resources and values;
- protect and provide opportunities for wilderness recreational activities in the backcountry, including reasonable access; these recreational opportunities should be defined within the context of a spectrum of recreational opportunities available on lands managed by public agencies in the Denali region (primarily state parks, other state lands, and federal Bureau of Land Management lands);
- ensure all National Park Service management practices and research activities in the backcountry are consistent with park purposes; and
- provide for the means to achieve public understanding and support of backcountry and wilderness values.

APPLICABLE LAWS, REGULATIONS, AND POLICIES

Management of Denali National Park and Preserve's backcountry must be consistent with the laws, regulations, policies, and plans of the federal government. The legal and policy framework that governs management of Denali is extensive; the following information summarizes the most important directives organized around categories of major actions. The directives are categorized as follows:

- Statute (law, legislation): These are the laws passed by Congress that provide the overriding direction for the management of national parklands and give the National Park Service its authority for management action. Citations may be found at <http://www4.law.cornell.edu/uscode/> or <http://uscode.house.gov/>.
- Regulation: Compiled in the Code of Federal Regulations (CFR), regulations are promulgated by the executive branch to interpret statutes. Citations may be found at <http://www.gpoaccess.gov/cfr/index.html>.
- Case Law: Disputes over the interpretation of law are resolved by administrative bodies, such as the Department of Interior's Office of Hearing and Appeals, and by the federal court system. Such interpretations then govern within the area of the court or administrative body's jurisdiction.
- Executive Orders: Executive Orders are instructions by the president to the federal agencies for carrying out their work. Citations may be found at <http://data2.itc.nps.gov/npspolicy/getEOs.cfm>.
- NPS Management Policies: Management Policies translate directives and guidance, including the Constitution, public laws, executive proclamations and orders, and regulations, into cohesive directions. They are published approximately every 10 years and apply servicewide. An electronic file of the current Management Policies is found at <http://data2.itc.nps.gov/npspolicy/index.cfm>.
- NPS Director's Orders: If and when it is necessary, Management Policies may be modified or supplemented by Director's Orders. These orders articulate new or revised policy on an interim basis between publication dates of NPS Management Policies. They also provide more detailed interpretation of Management Policies and outline requirements applicable to NPS functions and responsibilities. Full text files of the Director's Orders are found at <http://data2.itc.nps.gov/npspolicy/DOrders.cfm>.
- Park-specific Directives: Park-specific instructions, procedures, directives and other guidance supplemental to and in conformance with applicable NPS policies and regulations (such as hours of operation, the dates of seasonal openings, or procedures for implementing servicewide policies) may be set by superintendents within formal delegations of authority from regional directors. Denali's directives related to backcountry management are found primarily within park planning documents, particularly the 1986 *General Management Plan* and the 1976 *Backcountry Management Plan*, and within the annual *Superintendent's Compendium*. These documents can be found at <http://www.nps.gov/dena/pphtml/documents.html>

Authority for the General Management Plan Amendment and EIS Process

National Parks and Recreation Act of 1978 (NPSRA, 16 USC § 1 note, 92 Stat. 3467)

NPSRA requires the National Park Service to prepare and revise general management plans in a timely manner for each unit. A general management plan or amendments must include resource protection measures; general development locations, timing, and costs; carrying capacity analyses; and boundary modifications.

National Environmental Policy Act of 1969 (NEPA, 42 USC §§ 4321-4370d)

NEPA mandates that any federal project or any project that requires federal involvement be scrutinized for its impact on the natural and human environment and that reasonable alternatives for accomplishing the project purpose be considered. The purpose of NEPA is to help public officials make well-informed decisions that are based on an objective understanding of environmental consequences for any federal action with potentially major impacts. To ensure compliance with NEPA, a specified process for proposed projects must be followed. The steps in this process are:

1. Scoping
2. Draft Environmental Impact Statement (EIS)
3. Public Review of the Draft EIS
4. Final Environmental Impact Statement and Record of Decision

This document is a Final Environmental Impact Statement.

NPS Management Policies Chapter 2. This chapter specifies that the National Park Service will maintain an updated General Management Plan for each unit of the national park system and review, amend, or revise the plans every 10-15 years or sooner if conditions change rapidly. Important guidance for this plan includes mandates for management zoning, public involvement, cooperative regional planning, and the examination of alternative futures.

General Direction for Public Enjoyment and Resource Protection

The National Park Service Organic Act of 1916 (16 USC §§ 1-4, 39 Stat. 535)

The Organic Act establishes the National Park Service and directs the agency to

... promote and regulate the use of the Federal areas known as national parks, monuments, and reservations... by such means and measures as conform to the fundamental purpose of the said parks, monuments and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

Importantly for all planning processes in the park system, the Organic Act provides a fundamental standard for management – that park resources should remain “unimpaired” for the enjoyment of future generations.

Redwood National Park Expansion Act of 1978 (16 USC §§ 1-1a, 92 Statute 166)

The Redwoods Act amends the Organic Act and clarifies the importance Congress placed on protecting park resources such that:

The authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress.

NPS Management Policies Section 1.4. The NPS Management Policies use the terms “resources” and “values” to mean the full spectrum of attributes for which a park unit is established and managed, including the Organic Act’s fundamental purpose and any additional purposes as stated in a park unit’s establishing legislation. The impairment of park resources and values may not be allowed unless directly and specifically provided by statute. The primary responsibility of the National Park Service is to ensure that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities to enjoy them.

The evaluation of whether impacts of a proposed action would lead to impairment of park resources and values is included in the environmental consequences chapter of this document. Impairment is more likely when there are potential impacts to a resource or value whose conservation is

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified as a goal in the park’s general management plan or other relevant NPS planning documents.

NPS Management Policies Chapter 8. The NPS management policies address recreational activities in general and backcountry uses in particular in sections 8.1 and 8.2. To provide for enjoyment of the parks, the National Park Service will encourage visitor activities that

- are appropriate to the purpose for which the park was established; and
- are inspirational, educational, or healthful, and otherwise appropriate to the park environment; and
- will foster an understanding of, and appreciation for, park resources and values, or will promote enjoyment through a direct association with, interaction with, or relation to park resources; and
- can be sustained without causing unacceptable impacts to park resources or values.

Unless mandated by statute, the service will not allow visitors to conduct activities that

- would impair park resources or values;
- create an unsafe or unhealthful environment for other visitors or employees;
- are contrary to the purposes for which the park was established; or

- unreasonably interfere with
 - the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic, or commemorative locations in the park;
 - NPS interpretive, visitor service, administrative, or other activities;
 - NPS concessioner or contractor operations or services; or
 - other existing, appropriate park uses.

Case Law. *Wilkins v Department of the Interior*, 995 F.2d 850, 853 (8th Cir. 1993)

New Mexico State Game Commission v Udall, 410 F.2d 1197 (10th Cir. 1969)

These two cases demonstrate that the NPS need not wait for actual damage to occur before taking protective action to prevent degradation to wildlife and other natural resources. They were fundamental in the environmental assessment evaluating closure of the Old Park to snowmachine use (NPS 2000).

Mount McKinley National Park Backcountry Management Plan (NPS 1976). Increased visitation from increased access due to the opening of the George Parks Highway during the 1970s prompted Mount McKinley National Park to introduce use limits in 1974 and establish a quota system with the park’s 1976 *Backcountry Management Plan*. The plan outlined use limits for designated units in the backcountry and institutionalized the concepts of dispersed use and self-reliance. Implicit to the visitor experience in the backcountry of Mount McKinley National Park was the “overpowering feeling of wilderness” as articulated in later plans.

Management Areas

NPS Management Policies Section 2.3.1.3. Management policies specify that GMPs provide for management zoning to illustrate where there are differences in intended resource conditions, visitor experience, and management activity.

NPS Management Policies Section 8.2.1. Management policies also specify that to determine carrying capacity (as required by NPRA), “the decision-making process should be based on desired resource conditions and visitor experiences for the area; quality indicators and standards that define the desired resource conditions and visitor experiences; and other factors that will lead to logical conclusions and the protection of park resources and values.” Appendix H of the original *Draft EIS* provided detailed information about NPS visitor carrying capacity decision making, including the use of the Visitor Experience and Resource Protection process (NPS 2003d).

NPS Management Policies Section 4.9. The policy requires that the National Park Service will preserve, to the greatest extent possible, the natural soundscapes of parks. It requires the NPS to restore degraded soundscapes to the natural condition wherever possible, and to protect natural soundscapes from degradation due to noise (undesirable human-caused sound). The service is mandated to take action to prevent or minimize all noise that, through frequency, magnitude, or duration, adversely affects the natural soundscape or

other park resources or values, or that exceeds levels that have been identified as being acceptable to, or appropriate for, visitor uses at the sites being monitored.

Director's Order 47, Soundscape Preservation and Noise Management. This directive establishes that natural sounds are intrinsic elements of the environment, and states that the National Park Service considers natural sounds an inherent component of “the scenery and the natural and historic objects and the wild life ...” protected by the Organic Act. Park managers are directed to preserve natural soundscapes and to eliminate, mitigate, or minimize inappropriate noise sources through the NPS planning processes, such as general management plans and amendments. Park plans will address 1) the baseline natural ambient sound environment in qualitative and quantitative terms; 2) identify sound sources and sound levels consistent with park legislation and purposes; 3) identify the level, nature, and origin of internal and external noise sources; 4) articulate desired future soundscape conditions; and 5) recommend approaches or actions to achieve those conditions or otherwise mitigate noise impacts.

1986 General Management Plan. The General Management Plan for Denali National Park and Preserve zoned all of the park and preserve into one of four designations: Natural Zone, Historic Zone, Park Development Zone, and Special Use Zone. The 1997 *Entrance Area and Road Corridor Development Concept Plan (DCP)* further classified the Park Development Zone into several subzones. The Special Use Zone applied only to private inholdings within park boundaries, and has diminished in size as the NPS has purchased mining properties in the Kantishna Hills. This classification still applies to the remaining privately held properties throughout the park and preserve. The Historic Zone remains as specified in the GMP. The action alternatives of this backcountry management plan propose subdividing the Natural Zone into more specific classifications much as the *Entrance Area and Road Corridor DCP* subdivided the Park Development Zone.

Access

ANILCA Section 811 [16 USC § 3121(b)]. This section provides for continued access to public lands for subsistence use. Specifically, it states that “. . . rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on public lands” and “. . . the Secretary shall permit on the public lands appropriate use for subsistence purposes of snowmachines, motorboats and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulations.”

ANILCA Section 1110 [16 USC § 3170(a)]. This section provides for special access and access to inholdings. Of particular interest to this plan are the provisions for special access – including motorized access – across public lands that are not generally allowed in national parks or wilderness areas outside of Alaska. Subsection (a) reads in part:

Notwithstanding any other provision of this Act or other law, the Secretary shall permit ... the use of snowmachines (during periods of adequate snow cover, or frozen river conditions in the case of wild and scenic rivers), motorboats, airplanes, and non-motorized surface transportation methods for traditional activities (where such activities are permitted by this Act or other law) and for travel to and from villages and homesites. Such use shall be subject to reasonable regulations by the Secretary to protect the natural and other values of the conservation system units ... and shall not be prohibited unless, after notice and hearing in the vicinity of the affected unit or area, the Secretary finds such uses would be detrimental to the resource values of the unit or area.

Airplane Access

National Parks Overflights Act (16 USC § 1a-1 note, 100 Stat. 91). In 1987 the U.S. Congress enacted the National Parks Overflights Act, which called for the National Park Service to recommend to the Federal Aviation Administration (FAA) actions for the substantial restoration of natural sounds to Grand Canyon National Park. It also required the National Park Service to report to Congress on the nature of the overflight problem and its effects on park units. In 1995 the National Park Service presented the *Report on Effects of Aircraft Overflights on the National Park System* (NPS 1995b), which recommended that the National Park Service use the following methods when resolving airspace issues over national parks:

1. Work with the FAA and with air tour operators to develop voluntary agreements to reduce noise over parks.
2. Develop incentives to encourage air tour operators to replace equipment with quieter aircraft.
3. Develop flight-free zones and flight corridors over parks.
4. Create minimum altitude restrictions.
5. Encourage the FAA to require operators to conform to certain operational requirements such as using quieter aircraft.
6. Treat all commercial services provided to visitors in parks as concessions, which ensures services will conform to minimum standards, are not priced unreasonably, and are consistent with park values.
7. Develop noise budgets at landing areas, landing strips, and airports to allot responsibility for and control of noise among operators.
8. Limit times of operations and notify visitors of the best times to experience natural sounds.

43 CFR § 36.11. This regulation implements the “special access” provisions of ANILCA 1110(a) and provides that “Fixed-wing aircraft may be landed and operated on lands and waters within areas, except where such use is prohibited or otherwise restricted by the appropriate Federal agency, including closures or restrictions pursuant to the closures of paragraph (h) of this section.” This direction is an exception to the regulations at 36 CFR § 2.17 that generally prohibit aircraft landings in national parks except by special regulation. However, helicopter landings are prohibited unless a special use permit is issued for that purpose.

FAA Advisory Circular 91-36C, Visual Flight Rules, Flight Near Noise-Sensitive Areas. In addition to the 500-foot above-ground-level (AGL) guideline for surfaces around non-congested areas (FAA 2000a), this circular identifies 2,000 feet AGL as the minimum recommended altitude for overflights of noise sensitive areas, including units of the national park system. The suggested altitude minimums have been printed on the sectional aeronautical charts (scale 1:500,000) since the mid-1970s. The National Park Service recognizes that lower altitudes may be required at times because of weather conditions and emergencies (NPS 1986 GMP).

NPS Management Policies Section 8.4. The National Park Service will monitor the effects of aircraft overflights on park resources and values and visitor enjoyment. Because the National Park Service has no direct authority or jurisdiction over airspace above parks, it will actively seek the assistance of the Federal Aviation Administration and Department of Defense to resolve overflight concerns.

Snowmachine Access

36 CFR § 2.18. This regulation generally prohibits snowmachine use in national parks , except on routes and water surfaces designated by special regulations. In Alaska, however, two snowmachine access regulations provide for exceptions: 36 CFR 13.46(a) and 43 CFR 36.11(c). The rules in 36 CFR 2.18 continue to regulate snowmachine speed limits, noise, headlights and taillights, brakes, and minimum age necessary for operating a snowmachine. This section also adopts state regulations for snowmachines.

36 CFR § 13.46(a). This regulation states that snowmachines and other means of surface transportation traditionally employed by local rural residents engaged in subsistence uses are permitted in park areas, except at those times and in those areas restricted or closed by the superintendent.

43 CFR § 36.11(c). This regulation allows the use of snowmachines (during periods of adequate snow cover and frozen river conditions) for traditional activities (where such activities are permitted by ANILCA or other law) and for travel to and from villages and homesites and other valid occupancies, except where such use is prohibited or otherwise restricted.

36 CFR § 13.63(h). This special regulation addresses snowmachine operations specifically in Denali National Park and Preserve. It (a) defines a “traditional activity” in the former Mount McKinley National Park (Old Park) and (b) prohibits the use of snowmachines in the Old Park. Part (1) of subsection 13.63(h) defines the term “traditional activity” for the Old Park pursuant to ANILCA Section 1110(a) as follows:

A traditional activity is an activity that generally and lawfully occurred in the Old Park contemporaneously with the enactment of ANILCA, and was associated with the Old Park, or a discrete portion thereof, involving the consumptive use of one or more natural resources of the Old Park, such as hunting, trapping, fishing, berry picking or similar activities. Recreational use of snowmachines was not a traditional activity. If a traditional activity generally occurred only in a particular area of the Old Park, it would be

considered a traditional activity only in the area where it had previously occurred. In addition, a traditional activity must be a legally permissible activity in the Old Park. (36 CFR § 13.63 (h)(l))

State of Alaska Snowmachine Laws

The National Park Service enforces State of Alaska snowmachine laws on lands under NPS jurisdiction, including requirements for safety equipment, licensing, and registration.

Off-road Vehicle Access

Executive Order 11644, Use of Off-Road Vehicles on Public Lands. Section 3 of this Executive Order directed federal land management agencies to promulgate regulations on the designation of routes and areas for ORV use. This section requires that designation take place as a special park regulation and establishes criteria that the agency must consider when designating routes and areas. These considerations include soil, watershed, vegetation damage; wildlife harassment or wildlife habitat disturbance; and potential user conflicts. The Executive Order also states that ORV use in national park system areas is permitted only upon a determination that such use would not adversely affect the natural, aesthetic, or scenic values of the area. Both this order and the Wilderness Act prohibit the use of ORVs in designated wilderness. The National Park Service implemented this Executive Order's directive in 36 CFR § 4.10.

43 CFR § 36.11(g). In addition to the process outlined by Executive Order 11644, this regulation provides that permits could be issued for ORV access on existing ORV trails if not in designated wilderness and if a finding shows that such access would be compatible with purposes and values for which the area was established.

Boating and Water Use Activities

43 CFR § 36.11(d). This regulation allows motorboat use on all area waters , except where such uses are prohibited or otherwise restricted in accordance with the procedures of 43 CFR 36.11(h). However, the use of personal watercraft (PWC) is prohibited, except where such use is designated by regulations at 36 CFR § 3.24. No NPS areas in Alaska are designated for such use.

Non-Motorized Surface Transportation

43 CFR § 36.11(e). The regulation at 43 CFR § 36.11(e) allows non-motorized surface transportation, such as dog teams, horses, and other pack or saddle animals on federal lands in Alaska, except where such use is prohibited or otherwise restricted in accordance with the procedures of 43 CFR § 36.11(h). Pack animals that have traditionally been used for transportation in support of subsistence activities would be allowed under 36 CFR § 13.46(a).

Closures and Public Use Limits

36 CFR § 1.5. This regulation provides authority for the park superintendent to close or restrict all or some public use or activities in an area. The use of permit, registration, or reservation systems can be employed as a tool for accomplishing the public use limits. The superintendent must make a determination that such action is necessary “for the maintenance of public health and safety, protection of environmental or scenic values, protection of natural or cultural resources, aid to scientific research, implementation of management responsibilities, equitable allocation and use of facilities, or the avoidance of conflict among visitor use activities” and must explain why less restrictive measures would not suffice. The regulation at 36 CFR §13.30 provides guidance for restrictions and closures for specific activities identified in Part 13 for national park units in Alaska, and 43 CFR §36.11(h) provides guidance for restrictions and closures to special access under ANILCA 1110(a).

43 CFR § 36.11(h). This paragraph provides procedures for temporary or permanent closures to special access authorized under ANILCA 1110(a). The NPS “may close an area on a temporary or permanent basis to the use of aircraft, snowmachines, motorboats or non-motorized surface transportation only upon a finding by the agency that such use would be detrimental to the resource values of the area.” This paragraph also allows the agency to restrict or limit uses of an area under other statutory authority.

Wilderness Management

The Wilderness Act of 1964 (16 USC §§ 1131-1136, 78 Stat. 890).

The 1964 Wilderness Act established the National Wilderness Preservation System and identified the National Park Service as one of the four federal agencies responsible for protecting and preserving the nation's wilderness resource. The Wilderness Act defines wilderness as follows:

A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this chapter an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which

- (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable;
- (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation;
- (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and
- (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

The Wilderness Act prohibits construction of roads or structures and the use of motorized equipment and mechanical transport in designated wilderness areas, but provides for exceptions for certain administrative activities through a “minimum requirement” process.

Alaska National Interest Lands Conservation Act of 1980 (ANILCA, 16 USC §§ 3101-3233). ANILCA provides guidance about wilderness management at Denali.

- ANILCA Section 101 lists “preserve wilderness resource values” as a fundamental purpose of ANILCA.
- ANILCA Section 102(13), states that the term “wilderness” as used in ANILCA has the same definition as in the Wilderness Act.
- ANILCA Section 203(a) states that a fundamental purpose of the Denali park and preserve additions is to provide continued opportunities, including reasonable access, for wilderness recreational activities.
- ANILCA Section 1317 requires a wilderness suitability review and wilderness recommendations regarding the park additions and preserve lands added to Denali by ANILCA.

In addition, ANILCA provides some exceptions to national park and wilderness management practice that are detailed under the sections “Access,” described above, and “Facilities,” described below.

NPS Management Policies, Chapter 6. Section 6.3.1 establishes that suitable and proposed wilderness on NPS lands should be managed under wilderness policy.

For the purposes of applying NPS wilderness policies, the term 'wilderness' includes the categories of suitable, study, proposed, recommended and designated wilderness. NPS wilderness policies apply regardless of category. . . In addition to managing these classified areas for the preservation of their wilderness values, planning for these areas must ensure that the wilderness character is likewise preserved. . . The National Park Service will take no action that would diminish the wilderness suitability of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed. Until that time, management decisions pertaining to lands qualifying as wilderness will be made in expectation of eventual wilderness designation.

1986 General Management Plan. The 1986 GMP partially implemented the mandate of ANILCA Section 1317 by completing a wilderness suitability review of the Denali park additions and preserve. The review concluded that about 3.73 million acres of the park additions and preserve were suitable for wilderness designation, meaning that 99% of the entire park and preserve is either designated or suitable for designation as wilderness. The GMP concluded that “All lands determined suitable for wilderness designation will be managed under the terms of ANILCA to maintain the wilderness character and values of the lands until designation recommendations have been proposed and Congress has acted on these proposals.”

Denali National Park and Preserve Wilderness EIS (NPS 1988b). The park's wilderness EIS described the status of designated, suitable, NPS proposed and recommended wilderness. The National Park Service proposed recommending to Congress all of the park additions, except former mining districts in the Kantishna Hills and Dunkle Hills, and a few other areas along the south boundary and north of the Wolf Townships along the northeast boundary. None of the preserve areas was proposed for wilderness designation. This proposal was not forwarded by the secretary of interior to the president for a recommendation to Congress.

Map 3-1 in the *Revised Draft EIS* shows designated wilderness and areas determined suitable for wilderness designation at Denali.

Commercial Services

National Park Service Concessions Management Improvement Act of 1998 (Pub. L. 105-391, codified at scattered sections in the U.S. Code).

This act provides the requirements under which commercial visitor services are authorized in units of the national park system. Section 402(b) provides:

It is the policy of the Congress that development of public accommodations, facilities and services in units of the National Park System shall be limited to those accommodations, facilities and services that

- 1) are necessary and appropriate for public use and enjoyment of the unit of the national park system in which they are located; and
- 2) are consistent to the highest practicable degree with the preservation and conservation of the resources and values of the unit.

Wilderness Act (16 USC §§ 1131-1136, 78 Stat. 890). The Wilderness Act provides two pieces of guidance related to commercial activities in wilderness.

- Section 4(c): “Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise . . . within any wilderness area . . .”
- Section 6: “Commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the area.”

NPS Management Policies, Chapter 6. Management policies on wilderness clarify the Wilderness Act for management of commercial services on wilderness lands managed by the National Park Service. Section 6.4.4 directs the following:

Wilderness-oriented commercial services that contribute to public education and visitor enjoyment of wilderness values or provide opportunities for primitive and unconfined types of recreation may be authorized if they meet the “necessary and appropriate” tests of the National Park Service Concessions Management Improvement Act of 1998 and section 4(d)(6) of the Wilderness Act (16 U.S.C §§ 1133(d)(5)), and if they are consistent with the wilderness management objectives contained in the park's wilderness management plan, including the application of the minimum requirement concept.

NPS Management Policies, Chapter 10. These policies address commercial visitor services authorized either through concession contracts or commercial use authorizations. Section 10.2.2 specifies that commercial services planning will identify the appropriate role of commercial operations in helping parks to achieve desired visitor experiences. A decision to authorize a concession must be based on a determination that the facility or service

- is necessary and appropriate for public use and enjoyment and cannot be met outside of park boundaries;
- will be provided in a manner that furthers protection, conservation, and preservation of the environment; and
- will enhance visitor use and enjoyment of the park without causing unacceptable impacts to park resources or values.

Alaska National Interest Lands Conservation Act (ANILCA, 16 USC §§ 3101-3233). Section 1307(a) provides for persons who were adequately providing visitor services in areas incorporated into conservation system units as of January 1, 1979 to continue doing so, assuming such services are compatible with the purposes of the area and the service is adequately provided. Section 1307(b) provides preference for visitor service contracts to most affected Native Corporations and to local residents, except for sport fishing and hunting guiding activities.

Facilities

NPS Management Policies Chapter 9. The National Park Service will provide visitor and administrative facilities that are necessary, appropriate, and consistent with the conservation of park resources and values and will avoid the construction of buildings, roads, and other development that will cause unacceptable impacts on park resources and values. The policy provides parameters for constructing trails and backcountry campsites.

Wilderness Act (16 USC §§ 1131-1136, 78 Stat. 890). Structures and installations are generally not permitted in designated wilderness, although there are exceptions for cultural and historic resources and certain administrative purposes.

Alaska National Interest Lands Conservation Act (ANILCA, 16 USC §§ 3101-3233)

- Section 1306 provides for the establishment of visitor facilities and administrative sites within conservation system units if compatible with the purposes for which the unit is established, expanded or designated, or other provisions of the act. It also allows for construction of such facilities outside the boundaries of the unit, with a preference for locating such sites and facilities on Native lands in the vicinity.
- Section 1310 allows for the establishment of navigation facilities or facilities for weather, climate, and fisheries research and monitoring.
- Section 1315(d) authorizes the construction of new public use cabins in designated wilderness “if such cabins and shelters are necessary for the protection of public health and safety.”
- Section 1316 authorizes the continuation and new establishment of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment that

are directly and necessarily related to the taking of fish and wildlife where those activities are allowed. The secretary may deny such use if it is determined that the use would be detrimental to the purposes for which the conservation system unit was established, including the wilderness character of any wilderness area within a unit.

Denali South Side Development Concept Plan/EIS (NPS 1997a). This EIS evaluated the impacts of a proposed action and range of alternatives to phase in the development of visitor facilities and services on the south side of the Alaska Range. The final plan was a result of cooperative regional planning by the NPS, State of Alaska, Denali Borough, Matanuska-Susitna Borough, and two Native regional corporations (Ahtna, Inc., and Cook Inlet Region, Inc.). The plan included several backcountry facilities including:

- Five primitive fly-in campsites and up to two public-use cabins at Chelatna Lake.
- Four public-use cabins to be built on state land in the Tokositna area.
- Public access from the Dunkle Hills Road.
- A trail from a new visitor center on the Petersville Road to the park boundary.

The National Park Service is presently developing an implementation plan for portions of the *South Side Denali DCP* in conjunction with its partners, the State of Alaska and the Matanuska-Susitna Borough, but only the last of the items listed above will be addressed in this phase of implementation.

Denali Entrance Area and Road Corridor Development Concept Plan/EIS (NPS 1997b)

This plan addressed visitor use, resource protection, and related facility development in the “frontcountry” of Denali National Park and Preserve. The frontcountry includes all non-wilderness areas along the George Parks Highway, the Alaska Railroad, the entrance and headquarters areas, and the Denali Park Road corridor to the Kantishna airstrip. This plan included several backcountry facilities, including:

- Up to 10 walk-in campsites in the vicinity of Kantishna.
- Several hiking trails from the park road and the Parks Highway, including an upgraded Triple Lakes Trail and new trails on Thorofare Ridge from Eielson, Savage River, and between the Savage River Bridge and Savage Campground.

Americans with Disabilities Act (Pub. L. 101-336, 104 Stat. 327, codified at scattered sections in the U.S. Code).

The following language describes the relationship between ADA and the Wilderness Act:

Congress reaffirms that nothing in the Wilderness Act is to be construed as prohibiting the use of a wheelchair, and consistent with the Wilderness Act no agency is required to provide any form of special treatment or accommodation, or to construct any facilities or modify conditions of lands within a wilderness area to facilitate such use. The term wheelchair means a device designed solely for the use by a mobility-impaired person for locomotion that is suitable for use in an indoor pedestrian area. (Section 507c).

Wheelchairs that meet this definition are allowed in the backcountry of Denali National Park and Preserve.

Administrative and Scientific Activities

Wilderness Act (16 USC §§ 1131-1136, 78 Stat. 890). The Wilderness Act provided that administrative activities in wilderness must meet a “minimum requirement” test in order to be excepted from general prohibitions on temporary roads, use of motorized equipment and motorized or mechanized transportation, landing of aircraft, and structures or installations.

NPS Management Policies 8.4. Official NPS use of aircraft in and over parks will be limited to flights needed to support or carry out emergency operations or essential management activities where no practical alternative methods of access exist. National Park Service uses of aircraft will be planned and scheduled to minimize adverse impacts on park resources and values and visitor enjoyment.

Easements and Boundary Changes

National Parks and Recreation Act of 1978 (NPRA) (NPRA, 16 USC § 1 note, 92 Stat. 3467). The NPRA requires that general management plans for national parks consider boundary changes.

Alaska Native Claims Settlement Act, Section 17(b) [43 USC § 1616(b)]. Section 17(b) provides for the reservation of public access easements across Native corporation lands within or adjoining park and preserve lands. The purpose of these easements is to provide access from public lands and waters across the private lands to other public lands and waters. The National Park Service is responsible for managing these public access easements inside the park unit and for those assigned to the National Park Service outside of the park.

Alaska National Interest Lands Conservation Act (ANILCA, 16 USC §§ 3101-3233) Section 103(b) provides the Secretary of Interior the authority to make minor adjustments in the boundaries of areas added to or established by ANILCA with written notification to Congress. Section 1302(i)(1) authorizes the Secretary to acquire by donation or exchange lands contiguous to a conservation system unit.

PLANNING ISSUES CONSIDERED BUT NOT ADDRESSED

The following planning issues were identified during scoping, but are not addressed in this document. Many issues are not addressed because this plan is only a limited amendment of the 1986 *General Management Plan* and focuses on issues for which the guidance in the GMP is either lacking in detail or out of date.

Major Facility Development. The *Denali Entrance Area and Road Corridor (Front Country) Development Concept Plan* and the *Denali South Side Development Concept Plan* amended the park *General Management Plan* and provided for anticipated visitor facility needs on both the north and south sides of the park.

Denali North Access. Language contained in Senate Amendment 39, page CR H14289 for Fiscal Year 1996 directed the National Park Service to conduct a North Access Feasibility Study in cooperation with the State of Alaska and the tourism industry. This study was completed in April 1997. In transmitting this study to the Senate Committee on Energy and Natural Resources, the Department of Interior memorandum stated that:

The projected costs of either new road access or rail access into Denali would exceed the projected costs for the National Park Service's 10-year, visitor access development program for the entire State of Alaska. Thus, we believe this study must be considered in conjunction with the other National Park Service proposals for visitor facilities and access in Alaska—proposals developed with input from the State of Alaska, the visitor industry and the public.

This study is not to be interpreted in any way as implying that the National Park Service supports a northern route. Again, a new north access is contrary to the existing management plan for Denali National Park and Preserve (US Department of the Interior, 1997).

Congress has funded additional studies since the completion of the 1997 report. Funding was provided in fiscal year 2000 for a cooperative study with the State of Alaska to explore options for the location of campgrounds, trails, and other visitor facilities along the Stampede Road alignment, and that study was completed in August 2004. In 2002, the Denali Borough and the State of Alaska Department of Transportation and Public Facilities began a planning and reconnaissance study for a north Denali access route as directed by federal and state authorizations. Pending further decisions and actions on north access, the backcountry areas that might be affected by north access proposals will be managed as the rest of the park additions.

Wilderness Suitability and Wilderness Recommendations. ANILCA section 1317(a) required the National Park Service to conduct a wilderness suitability review, which was included in the 1986 *General Management Plan* for Denali National Park and Preserve. The review concluded that about 3.73 million additional acres of the non-designated lands in the park and preserve were suitable for wilderness designation. An area within the Kantishna Hills was determined to be unsuitable for wilderness because of persistent disturbance caused by past mining and the road system; however, most of these lands are now suitable because of changing conditions. For example, most mining properties have been purchased and many of these areas are being restored. A new suitability study would likely result in additional acreage identified as suitable in the Kantishna Hills, but that study is not included with this plan.

In 1988, the National Park Service forwarded an environmental impact statement for wilderness recommendations to the secretary of the interior. The preferred alternative identified 2.25 million acres of the 3.73 million suitable acres to be proposed for wilderness designation. The secretary of the interior did not forward the proposal to the president to send to Congress for approval. Because of the complexity of the process and the fact that wilderness designation requires congressional action, wilderness

recommendations are not addressed in this plan. However, as discussed in the plan the wilderness values of the suitable lands will continue to be protected.

Subsistence Management. Subsistence management for Denali National Park and Preserve is addressed in the 2000 *Subsistence Management Plan* (NPS 2000i) that was prepared in cooperation with the Denali Subsistence Resource Commission. The backcountry management plan, therefore, does not include recommendations for managing subsistence uses. Because of the importance of these uses and because of potential conflicts from other uses, however, subsistence is included as an impact topic.

Snowmachine Access in Old Park by Individuals with Disabilities. The National Park Service has determined that any snowmachine use would be detrimental to the resource values of the Old Park. As a result, areas of the park that are closed to snowmachine use (such as the Old Park) would not be open to snowmachine use by persons with disabilities. This decision treats all potential users equally in that snowmachine use is prohibited for everyone in the old park. The commercial dog sled companies that operate in the old park have expressed a willingness to take any interested individuals, including those with disabilities, into the Old Park.

Off-Road Vehicle (ORV) Use. The use of ORVs, except on established roads is generally prohibited in Denali (36 CFR § 4.10, 43 CFR § 36.11). ORV use can occur on state right-of-ways. ORVs have been authorized in the past and may be authorized in the future to access inholdings in the Kantishna Hills pursuant to a right-of-way permit. ORVs traditionally employed for subsistence purposes are regulated under 13 CFR § 13.46, and a separate plan and NEPA compliance will address resource protection alternatives pursuant to the July 2005 Cantwell Subsistence Traditionally Employed ORV Determination.

Natural and Cultural Resource Management. Priorities for studies and procedures for managing natural and cultural resources are not addressed in the backcountry management plan since they are included in the 1998 *Resource Management Plan*. That plan outlines management and study of air resources, aquatic resources, geological resources, terrestrial biota, wildland fire, cultural resources, and subsistence resources.

Minerals Management. This topic is included in the 1991 *Record of Decision on the Cumulative Impacts of Mining in Denali* and the 1998 *Resource Management Plan* so is not addressed in the backcountry management plan.

IMPACT TOPICS

Impact Topics Considered In This Document

Potential Effects on Soils and Water Resources. Methods and routes of access and the intensity and levels of use in various backcountry management areas could lead to impacts on soil and water. Of particular concern are potential damage to ice-rich permafrost soils from surface travel and potential localized degradation of water quality where visitors are concentrated on glaciers.

Potential Effects on Vegetation. The levels and intensity of backcountry uses (aircraft access, snowmachining, mountaineering, hiking, camping) could have adverse effects on vegetation and wetlands. Design of management areas, access corridors, group sizes, and means of transportation could all be factors in the extent of these impacts.

Potential Effects on Fish and Wildlife. Various backcountry uses and means of access could affect fish and wildlife habitat, wildlife behavior, and wildlife distribution. The design of management areas and the levels of use within them must consider the potential effects on wildlife behavior and the possible effects to wildlife populations and their habitat.

Potential Effects on Natural Soundscapes. Quiet and solitude were identified as key values of the park and preserve. Various uses of motorized equipment or changes in the level of any human activity may adversely affect natural soundscapes.

Potential Effects on Wilderness. The various forms of access and uses in the park and preserve could affect wilderness resource values. ANILCA designated 99% of the Old Park as the Denali Wilderness and almost all of the park additions and preserve have been determined suitable for wilderness designation.

Potential Effects on Subsistence. Changes in backcountry use have the potential to affect wildlife numbers and distribution for subsistence species. Increased access to preserve areas could create more competition for harvest from sport hunters. ANILCA and NPS policy require proposed actions within Alaska national parks to address potential effects on the area's legally permitted subsistence uses. A section 810 subsistence evaluation and finding is included as appendix C in the environmental impact statement.

Potential Effects on Cultural Resources. Increased access into backcountry management areas of the park by various user groups could disturb historical resources, such as historic backcountry patrol cabins. The design of management areas and use levels within them should consider the potential impacts on cultural resources.

Potential Effects on Recreational Opportunity and Visitor Safety. Prescriptions for access, management tools, guided activities and commercial services, and other plan components could affect visitor numbers, how visitors access the park, what kind of activities visitors participate in, the type of experience available, and visitor safety.

Potential Effects on Local and Regional Economy. The allocation of uses in and over management areas in the park and preserve could affect the regional and local economies of Southcentral and Interior Alaska, particularly the recreational and tourism sectors.

Potential Effects on Park Management and Operations. The actions described in most alternatives could affect park management and operations, requiring staff, equipment, and facilities to fulfill the responsibilities necessary for successful implementation.

Impact Topics Considered But Not Addressed

Effects on Air Quality. Exhaust emissions from internal combustion engines associated with motorboats, snowmachines, and airplanes could have adverse impacts on air quality. Denali is designated a Class I airshed under the Clean Air Act amendments and has exceptionally clean air. However, at projected levels of dispersed use, resource experts believed there would be no more than minor impacts to air quality under any alternative.

Effects on Soils from Hiking and Camping. Excessive concentration of hiking and camping on trails and campsites can lead to deterioration of surface soils, compaction of mineral soils, and severe erosion on slopes. Impacts to soils in Denali National Park and Preserve from hiking and camping would be detectable along established trails; however, in all management scenarios, trails constitute a small part of the park (< 1%) and are generally constructed by NPS to prevent worse erosion from social trail formation; therefore, overall impacts to soils from these activities would be negligible to minor.

Effects on Slope Stability, Hydrologic Regimes, and Drainage Patterns. Trail construction could affect slope stability, but there are not enough proposed trails to assume an impact of any significance. Bank erosion could occur from motorboat use but use is not expected to increase to a level that would cause anything more than a minor impact to bank stability on rivers in the park. Changes in hydrologic regime and drainage patterns would be negligible to minor for all alternatives. Trail construction in the Kantishna Hills would alter surface hydrology, including sheet flow of water; however, impacts would be minimal given the low level of expected trail development and the tendency for trails to develop on ridge-tops and areas of mineral soil.

Effects on Water Quality: The impact to water quality from motorized vehicle access and human waste was investigated as a separate topic. The impact to overall water quality was considered to be minor or negligible in all alternatives and was eliminated from general consideration. However, there were site specific concerns for fish habitat and drinking water quality that are addressed under the Wildlife section and Recreational Opportunity and Visitor Safety sections respectively.

Effects on Threatened and Endangered Species. The American peregrine falcon was the only threatened and endangered species in the park area, but this species was removed from the threatened and endangered species list on August 25, 1999 (64 FR 46542).

Effects on Cultural Landscapes. Of the four cultural landscapes identified at Denali, only two are within the scope of the plan: Kantishna and part of the Teklanika Archaeological District. Neither has been described so impacts are difficult to determine. While there are potential future impacts, the actions described in the plan are unlikely to have more than minor impacts on these two cultural landscapes.

Effects on Ethnographic Resources. There are known ethnographic resources in the park. However, there are not yet any traditional cultural properties identified. While there could be impacts identified in the future (e.g. high visitor use near burial sites, disruption of traditional fish camp sites, etc.), no more than minor impacts could be determined at this time.

Effects on Minority Populations and Low-Income Populations. Executive Order 12898 requires federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. The backcountry management plan would not result in significant direct or indirect adverse effects on any minority or low-income population or community.



Chapter 2: Alternatives

INTRODUCTION

This chapter contains a modified version of the preferred alternative from the *Revised Draft EIS*. This alternative incorporates the proposals from Actions Common to All Action Alternatives, some of which have also been modified. Table 2-14 at the end of the chapter provides a comparative summary of this alternative with the other alternatives presented in the *Revised Draft EIS*. The complete versions of the original preferred alternative (Alternative 4) and the other alternatives are found in the *Revised Draft EIS*.

The modified preferred alternative is described below using the same topic areas as the alternatives in the *Revised Draft EIS*.

- Management Areas
- Access
- Wilderness Management
- Commercial Services
- Backcountry Facilities
- Administrative and Scientific Activities
- Easements and Boundary Changes

Existing backcountry units and requirements for overnight camping permits, use limits, and food storage have been developed through previous planning efforts, including the 1976 *Backcountry Management Plan* and its subsequent modifications. These provisions would apply as described in appendix D of the *Revised Draft EIS*.

OVERVIEW OF THE PREFERRED ALTERNATIVE

This backcountry management plan would guide the National Park Service in providing opportunities for a variety of wilderness recreational activities and experiences while recognizing and protecting the premier wilderness resource values of the entire backcountry. Areas in the Dunkle Hills and around the Ruth and Tokositna Glaciers on the south side of the Alaska Range would be managed for those visitors who want to experience the wilderness resource values or other resource values of the Denali backcountry but require services or assistance, or who are unable to make a lengthy time commitment. Areas along the park road in the Old Park and the Kantishna Hills would provide accessible opportunities for short- or long-duration wilderness recreational activities with only limited options for guidance or assistance the farther one gets from the park road. The remainder of the backcountry would be managed for dispersed, self-reliant travel, and would include opportunities for extended expeditions in very remote locations.

MANAGEMENT AREAS

This alternative would subdivide the Natural zone identified in the 1986 *General Management Plan* into a variety of more specific management areas. Each of these new management areas reflects an overall management concept or vision and provides for a related set of opportunities in the backcountry. Each area is defined by a set of desired future resource and social conditions. Allocation of management areas is a prescriptive process that describes the desired condition rather than the existing condition.

For all areas, common management policies would apply to subsistence activities, fire management, cultural resources management, natural resources management, and reclamation as expressed in other plans. These plans include:

- *Subsistence Management Plan* (NPS 2000i, annual updates)
- *Fire Management Plan* (NPS 2004a)
- *Resource Management Plan* (NPS 1998)
- *Reclamation Plan* (NPS 2001c)

Map 2 shows how management areas would be applied under this alternative.

The backcountry includes privately-owned lands, some unpatented mining claims in the Kantishna Hills, lands conveyed to the State of Alaska, and certain segments of the State road and railroad right-of-way easements. The National Park Service recognizes these inholdings and respects the rights of the landowners. Inholdings are located primarily in the Kantishna area and the northwest part of the preserve, with a few on the south side of the Alaska Range such as the Mountain House in the Ruth Amphitheater and the Tokosha Mountain Lodge along the Tokositna River. These inholdings remain in the Special Use zone as described in the 1986 *General Management Plan*. The name for that management zone would be modified to Inholdings Special Use Area to distinguish it from the Ruth Glacier and West Buttress Special Use Areas described below. Those private lands designated Special Use in the 1986 *General Management Plan*, but which 1) have been acquired by the National Park Service, and 2) are within the geographic scope of the backcountry management plan, would be included within the new management areas described by this plan.

Management Area Descriptions

The management areas are defined to provide specific recreational opportunities and resource conditions that are appropriate given the purposes for which the national park unit was established. Most of the areas are designed to cover substantial areas of the park and preserve, but some – including the Backcountry Hiker, Corridor, Portal, and West Buttress Special Use areas – are intended to provide high use routes, trails, or landing areas to accommodate backcountry transportation and concentrated use directed at particular destinations. The former Mount McKinley National Park (the Old Park) has separately defined management areas to reflect its unique history, resource values, and legal status.

The management areas are defined in the following table. Each area has an indicated purpose, followed by descriptive terms for several qualities that define minimally acceptable conditions

for that management area. These qualities are indicators of the visitor experience and resource conditions in each management area. Although they do not capture the entire range of qualities that comprise the experience and resources of the area, they are intended to provide both a reasonable indication to visitors of what they should expect and guidance to managers about appropriate management actions and levels of use. The indicators chosen for the Denali backcountry include the following:

Resource Conditions

- Trail and campsite disturbance
- Evidence of modern human use
- Landscape modifications
- Litter and human waste
- Natural sound disturbance
- Wildlife population, demographics, and distribution

Social Conditions

- Encounters with other people
- Encounters with large groups
- Camping density
- Accessibility
- Management presence

Following the definitions in table 2-1 is a set of tables (tables 2-2 through 2-9) that provide a key for the indicators, defining them and their condition levels. These tables provide a narrative description for desired conditions, specific standards that provide a quantitative interpretation of those conditions, and both a monitoring strategy and a review process for each indicator.

Indicators are generally selected to represent those resources and conditions that are allowed to change until they approach the quantitative thresholds. However, the National Park Service would take action to manage visitor use under many other circumstances if that use would be detrimental to resource values of the park. For example, the National Park Service would act to avoid the introduction of exotic plant species to the park backcountry; to protect wildlife habitat particularly during critical times such as breeding, nesting, and denning; to protect subsistence resources and opportunities; and to avoid bear-human conflict.

Table 2-1: Management Area Descriptions

Management Area	Purpose	Resource Condition	Social Condition
A	Provide a diversity of opportunities for wilderness recreational activities that are relatively accessible to day-users and to those who have limited wilderness travel skills or equipment.	Trail & campsite disturbance: Medium Evidence of modern human use: Medium <i>Landscape modifications:</i> No Litter & human waste: Low Natural sound disturbance: High	Encounters with people: High <i>Encounters w/large groups:</i> Yes Camping density: Low Accessibility: Medium Administrative presence: Medium
B	Provide opportunities for wilderness recreational activities suitable for day-users and overnight users that are remote and require self-reliance.	Trail & campsite disturbance: Low Evidence of modern human use: Low <i>Landscape modifications:</i> No Litter & human waste: Low Natural sound disturbance: Medium	Encounters with people: Medium <i>Encounters w/large groups:</i> Yes Camping density: Low Accessibility: Low - Medium Administrative presence: Low
C	Provide opportunities for climbing and mountaineering experiences in a wilderness setting.	Trail & campsite disturbance: Medium Evidence of modern human use: Medium <i>Landscape modifications:</i> No Litter & human waste: Low Natural sound disturbance: Medium	Encounters with people: High <i>Encounters w/large groups:</i> Yes Camping density: Low Accessibility: Low – Very Low Administrative presence: Low
D	Provide opportunities for extended expeditions that are remote and require self-reliance, significant time commitment, and thorough advance planning.	Trail & campsite disturbance: Low Evidence of modern human use: Low <i>Landscape modifications:</i> No Litter & human waste: Low Natural sound disturbance: Low	Encounters with people: Low <i>Encounters w/large groups:</i> No Camping density: Low Accessibility: Low Administrative presence: Low
Portal	Provide high-use airplane landing areas that provide access to remote parts of the park and preserve. Year-round or seasonal. *Natural sound disturbance standard is same as for surrounding area, but no lower than Medium.	Trail & campsite disturbance: N/A Evidence of modern human use: Medium <i>Landscape modifications:</i> No Litter & human waste: Low Natural sound disturbance: Medium-High*	Encounters with people: N/A <i>Encounters w/large groups:</i> Yes Camping density: Medium Accessibility: Medium Administrative presence: Medium

Portal - Major Landing Area	Provide high-use airplane landing areas that are suitable for both day use and expedition drop-off and pick-up. Seasonal, May-September.	Trail & campsite disturbance: N/A Evidence of modern human use: High <i>Landscape modifications:</i> Yes Litter & human waste: Low Natural sound disturbance: Very High	Encounters with people: N/A <i>Encounters w/large groups:</i> Yes Camping density: High Accessibility: High Administrative presence: Medium-High
Corridor	Provide high-use travel routes via ground or water that provide access to remote parts of the park and preserve. Year-round or seasonal.	Trail & campsite disturbance: Medium Evidence of modern human use: High <i>Landscape modifications:</i> Yes Litter & human waste: Low Natural sound disturbance: High	Encounters with people: Very High <i>Encounters w/large groups:</i> Yes Camping density: Medium Accessibility: Low-High Administrative presence: Medium
Backcountry Hiker	Provide day use trails into the backcountry in areas that are accessible to many visitors. Year-round or seasonal. * No camping would be allowed on the trails.	Trail & campsite disturbance: N/A Evidence of modern human use: High <i>Landscape modifications:</i> Yes Litter & human waste: Low Natural sound disturbance: Medium	Encounters with people: Very High <i>Encounters w/large groups:</i> Yes Camping density: N/A* Accessibility: High Administrative presence: High
Ruth Glacier Special Use	Provide for high use of transportation services during the season when large numbers of day users are accessing the Ruth Amphitheater. Seasonal, May-September.	Trail & campsite disturbance: Medium Evidence of modern human use: Medium <i>Landscape modifications:</i> No Litter & human waste: Low Natural sound disturbance: Very High	Encounters with people: High <i>Encounters w/large groups:</i> Yes Camping density: Low Accessibility: Low – Very Low Administrative presence: Medium
Old Park	Provide opportunities for day use and overnight wilderness recreational activities that are remote and require self-reliance in an area that has limited opportunities for motorized access.	Trail & campsite disturbance: Medium Evidence of modern human use: Low <i>Landscape modifications:</i> No Litter & human waste: Low Natural sound disturbance: Low	Encounters with people: Medium <i>Encounters w/large groups:</i> Yes Camping density: Low Accessibility: Medium - High Administrative presence: Medium

Table 2-1: Management Area Descriptions, continued

Management Area	Purpose	Resource Condition	Social Condition
OP2	Provide opportunities for extended expeditions that are remote and require a high degree of self-reliance, significant time commitment, and thorough advance planning in an area that has limited opportunities for motorized access.	Trail & campsite disturbance: Low Evidence of modern human use: Low <i>Landscape modifications:</i> No Litter & human waste: Low Natural sound disturbance: Low	Encounters with people: Low <i>Encounters w/large groups:</i> No Camping density: Low Accessibility: Low Administrative presence: Low
West Buttress Special Use	Provide a seasonal route to the summit of Mount McKinley that can accommodate large numbers of climbers during the primary climbing season. Seasonal, late April to mid-July.	Trail & campsite disturbance: N/A Evidence of modern human use: High <i>Landscape modifications:</i> Yes Litter & human waste: Low Natural sound disturbance: Low	Encounters with people: N/A <i>Encounters w/large groups:</i> Yes Camping density: High Accessibility: Low – Very Low Administrative presence: High

Key to the Management Area Descriptors

The following tables present qualitative and, where possible, quantitative standards for each descriptor used in Table 2-1; a monitoring strategy; and a review process for each indicator to allow for changes if the indicators or standards are not functioning as intended or new information requires a reappraisal. Generally, if conditions approach the minimally acceptable standards, the National Park Service would take actions described in this plan to prevent the standard from being exceeded.

Where specific standards are provided, the National Park Service would expect those standards to be achieved for 95% of all measurements or samples obtained through monitoring over the course of a visitor season (e.g., May to September for summer activities, February to April for late winter activities).

Table 2-2: Trail and Campsite Disturbance

Descriptor	Description & Standard	Monitoring	Process for Evaluation
Medium	Visitors notice occasional social trails, campsites, or cut or broken vegetation.	Monitoring would occur at three levels. These include: <ol style="list-style-type: none"> 1) the use of an existing grid system of plots for monitoring changes in vegetation cover that are randomly distributed through the park and preserve, 2) a set of index sites where known social trail or campsite formation can be monitored, and 3) a random sample of additional locations selected each year. Variables to monitor would include bare ground, vegetation cover, soil compaction, physical damage to plants, and site characteristics, such as soil moisture and soil temperature.	The “Medium” descriptor is intended to match current conditions in the Old Park in areas accessible from the park road corridor. The first phase of the monitoring program would utilize existing data and new field observations to describe those conditions in more detail.
Low	Visitors notice few if any signs of social trails, campsites, or cut or broken vegetation.		
N/A	Identifies an alpine area that has very scarce or no vegetation or soil. Trails and campsites on snow are not monitored.		

Table 2-3: Evidence of Modern Human Use

Descriptor	Description & Standard	Monitoring	Process for Evaluation
High	Visitors have at most 5 encounters with modern equipment or landscape modifications each day of their trip.	Monitoring would be conducted at least once every five years by visitor survey, and would be supplemented by continuous observation of ranger patrols.	The first visitor survey after plan approval would contain questions to evaluate the usefulness of this indicator and investigate other alternatives for indicating the impact of modern civilization on the wilderness experience. Survey results could be used to modify this indicator, but the relative differences between categories (High, Medium, Low) would be retained.
Medium	Visitors have at most 3 encounters with modern equipment or landscape modifications each day of their trip.		
Low	Visitors have at most 1 encounter per trip with modern equipment or a landscape modification.		
Landscape Modifications			
Yes	There may be visible mitigations for visitor use such as constructed trail segments, route markers, signs, bridges, designated campsites, food storage facilities, sanitation facilities, fixed climbing lines, or others as described or proposed by this plan.		
No	There are no visible landscape mitigations for visitor use.		
<p>Notes: “Modern equipment” includes communication facilities, research equipment, chain saws, motorized or mechanized vehicles on the ground, and other similar devices. This definition does not include portable devices that a person could reasonably carry without assistance (e.g., cell phones, GPS units, fuel-burning stoves), subsistence equipment such as traps or firearms, or aircraft in flight.</p> <p>“Landscape modifications” specifically do not include historic or cultural resources such as historic cabins, gravesites, or other structures or artifacts. They also do not include permitted modifications for subsistence use such as cabins or trapline trails.</p> <p>An “encounter” refers to visual recognition. A single trail or route markers associated with a single route would count as only one encounter. Audio recognition of noise is covered under the Natural Sound Disturbance standards.</p>			

Table 2-4: Litter and Human Waste

Descriptor	Description & Standard	Monitoring	Process for Evaluation
Low	No more than 5% of visitors encounter human waste, toilet paper, or litter in the backcountry.	Monitoring would be conducted at least once every five years by survey of backcountry visitors. This information would be supplemented by the observations of park staff during backcountry patrols.	

Table 2-5: Natural Sound Disturbance

Descriptor	Description & Standard	Monitoring	Process for Evaluation
Very High	Natural sounds are often interrupted by motorized noise including loud noise. Motorized noise may be audible up to 50% of any hour, and there may be up to 50 motorized noise intrusions per day that exceed natural ambient sound. Motorized noise does not exceed 60dBA.	Sound monitoring would be conducted on a continuous basis using remote monitors. Long-term monitoring and attended monitoring would take place at locations of particular concern or where it has been determined that management action is necessary to meet standards. Other locations would be randomly sampled.	Indicators and standards would be used as benchmarks for five years while additional information is gathered through the initial stages of the monitoring program. After five years, the NPS would propose changes to either the indicators or standards through a public process. Relative differences between categories (Low, Medium, High, Very High) would be retained during the revision process.
High	Natural sounds are frequently interrupted by motorized noise, including some loud noise. Motorized noise may be audible up to 25% of any hour, and there may be as many as 25 motorized noise intrusions per day that exceed natural ambient sound. Motorized noise does not exceed 60dBA.		
Medium	Natural sounds predominate in this area, but there are infrequent motorized intrusions, a few of which may be loud. Motorized noise may be audible up to 15% of any hour, and there may be as many as 10 motorized noise intrusions per day that exceed natural ambient sound. Motorized noise does not exceed 40dBA.		
Low	Natural sounds predominate in this area and motorized noise intrusions are very rare and usually faint. Motorized noise may be audible up to 5% of any hour, and there is no more than 1 motorized intrusion each day that exceeds natural ambient sound. Motorized noise does not exceed 40dBA.		
<p>Notes: “Audible” means audibility to a person of normal hearing. Maximum sound levels assume the measurement device is more than 50 feet from the noise source. For comparison, 40dBA is the overall sound level inside a typical residential home. 70dBA is the sound level of a vacuum cleaner as perceived by the user.</p>			

Table 2-6: Encounters with People

Descriptor	Description & Standard	Monitoring	Process for Evaluation
Very High	Visitors commonly encounter other parties in these areas. They generally encounter 10 or fewer parties per day.	Monitoring would be conducted at least once every five years by survey of backcountry visitors and “displaced” (see below) backcountry visitors. This information would be supplemented by the observations of park staff during backcountry patrols.	The NPS would review encounter rate standards after each five-year survey to evaluate visitor satisfaction and the success of the standards in achieving management area goals. If professional judgment suggests that changes are necessary, the NPS would propose new indicators and/or standards through a public process. The relative differences between management areas would be retained.
High	Visitors commonly encounter other parties in these areas, although they still have many opportunities to be alone. They generally encounter 5 or fewer parties per day.		
Medium	Visitors occasionally encounter other parties in these areas, but are almost always alone. They generally encounter 2 or fewer parties per day.		
Low	Visitors are unlikely to encounter other parties in these areas during the course of their backcountry trip.		
N/A	There is no standard for encounter rate in this area. Visitors may always be within sight or sound of other visitors.		
Encounters with Large Groups			
Yes	1 or 2 of the parties encountered may have more than 6 people.		
No	No parties are encountered that are larger than 6 people.		
<p>Notes: An <i>encounter</i> is the unaided recognition by sight or sound of another park user, including other recreationalists or subsistence users. An encounter does not include aircraft in flight which are addressed under Natural Sound Disturbance. “Displaced” backcountry visitors are those who would visit the park backcountry, but do not because management limitations, crowding, or other factors make it an undesirable destination.</p>			

Table 2-7: Camping Density

Descriptor	Description & Standard	Monitoring	Process for Evaluation
High	During the season of peak visitation, there is little or no opportunity for visitors to camp out of sight and sound of others. At other times of year visitors may be able to camp out of sight and sound of others.	Monitoring would be conducted at least once every five years by survey of backcountry visitors. This information would be supplemented by observations of park staff during backcountry patrols.	As part of the monitoring process, NPS would evaluate the importance placed by park users on this indicator. The distinctions between categories could be adjusted through a public process within the context of all the indicators related to “social conditions” in the park backcountry.
Medium	During the season of peak visitation, visitors may have to camp within sight or sound of others, but often are able to avoid doing so. At other times of year visitors generally are able to camp out of sight and sound of others.		
Low	Visitors are always able to camp out of sight and sound of others.		

Notes: This category refers only to the opportunity to camp outside of sight or sound of other park visitors; however, visitors may still choose to camp where they can see or hear others. “Sight or sound” refers to unaided recognition of another campsite from the site where the visitor camps for the night.

Table 2-8: Accessibility

Descriptor	Description	Monitoring & Evaluation
High	These areas are suitable for casual use and do not require extensive time commitments, specialized backcountry travel skills, advance planning, or self-reliance.	This category is descriptive only. The actions that determine the rating are listed elsewhere in this plan. Since the status would not change without additional action, monitoring is unnecessary.
Medium	Visits to these areas require self-reliance, but may not require extensive time commitments, specialized backcountry travel skills, or extensive advance planning.	
Low	Visits to these areas require significant time commitment, some specialized backcountry travel skills, advance planning, and a high-degree of self-reliance.	
Very Low	Visits to these areas require significant time commitment, specialized backcountry travel skills, thorough advance planning, and a high degree of self-reliance.	

Notes: NPS management largely determines the degree of accessibility by providing facilities (such as trails) or services (transportation, guide services) that determine how easy or difficult it is to travel in an area of the park. Terrain also plays a role, primarily in the alpine mountaineering areas that require specialized equipment and knowledge. These are the only areas that achieve a “very low” rating, although the availability of guide services that can provide equipment and instruction can boost the rating to a “low.” Areas accessible to day visitors who decide to visit spontaneously without planning or preparation achieve a “high” rating.

Table 2-9: Administrative Presence

Descriptor	Description	Monitoring	Process for Evaluation
High	Rangers are frequently present, so visitors generally have some contact with them. Visitors may occasionally encounter staff or permitted researchers involved in inventory and monitoring projects and research in some areas.	Ranger patrols would record and report visitor contacts. Visitor surveys would assess the amount and quality of interactions between visitors and NPS rangers and researchers at least once every five years.	There are no specific quantitative indicators or standards proposed for this category.
Medium	Rangers may make routine visitor contacts, so visitors may be aware of administrative presence. Visitors may occasionally encounter staff or permitted researchers involved in inventory and monitoring projects and research in some areas.		
Low	Administrative presence is generally limited to emergency activities and occasional patrols, with research and resource monitoring projects in some areas.		
<p>Notes: This category only includes interactions with administrative and research personnel, which are not included with the encounter rate standards given above. Interactions with park aircraft, research equipment, snowmachines, or other equipment are included in the standards for Evidence of Modern Human Use and Natural Sound Disturbance.</p>			

Wildlife

Wildlife is one of Denali’s most important resources. Active monitoring of the populations, distributions, and demographics (e.g., age structure, gender ratios) of major wildlife species would occur throughout the duration of plan implementation. If statistically significant changes occur in any of the variables listed, and these changes could be correlated with changes in visitor use, the National Park Service would take actions described in this plan to manage the level and/or type of visitor use. Additional development of wildlife indicators and standards would occur during plan implementation. The National Park Service would consult with the Alaska Department of Fish and Game during the development of specific indicators, standards, and protocols for monitoring.

Management Area Designations

Management areas would be applied as depicted in Map 2. The percentage of the park and preserve allocated to each management area is as follows:

Table 2-10: Area of Park and Preserve by Management Area

Management Area	Acres	% Backcountry
A	358,256	6%
B	962,244	16%
C	312,469	5%
D	2,242,454	38%
OP1	1,408,886	24%
OP2	737,409	11%
TOTAL	6,028,202	100%
Special Use Areas	150,269	2.5%

Summer season Corridors would be designated as follows:

- Kantishna and Muddy Rivers (56 miles)
- the lower Tokositna River (4 miles)
- Skyline and Moose Creek former mining access routes in Kantishna (10 miles).

If demand is sufficient, the National Park Service could also designate the following winter season Corridor management areas:

- three Corridors from the southern park boundary to the Old Park boundary near West Fork Chulitna River, Bull River, and Cantwell Creek (12.5 miles)
- the lower Tokositna River (4 miles)
- the upper Tokositna River to the mouth of Wildhorse Creek (3 miles).

All Corridors are depicted on Map 3.

The Ruth Glacier Special Use Area would be designated to include areas of the Ruth and Tokositna Glaciers as shown on Map 2. Backcountry Hiker designations are described below under Backcountry Facilities.

Major Landing Areas and Portals would be designated as follows (see Map 4):

- Major Landing Areas – Kahiltna Base Camp and Ruth Amphitheater
- Portals – Pika Glacier, Coffee Glacier, Buckskin Glacier, Eldridge Glacier, and upper Tokositna Glacier.

The locations of Major Landing Areas and Portals could be adjusted to respond to changes in the glaciers; however, the number and approximate size of the Major Landing Areas and Portals would remain the same as these adjustments occur.

The West Buttress Special Use Area would be designated to include the entire West Buttress route on Mount McKinley, from the Old Park boundary at the Kahiltna Base Camp portal to the summit of the mountain. Existing backcountry trails (those that extend beyond the development zones and Backcountry Day Use Areas described in the 1997 *Entrance Area and Road Corridor DCP*) would be designated as Backcountry Hiker areas. These trails are described in the Visitor Use and Experience section of Chapter 3, Affected Environment.

ACCESS

General Guidance

Access to all parts of the Old Park, park additions and preserve would be managed to achieve management area standards using the tools identified below. Recreational access to the Old Park would continue to be managed to emphasize non-motorized access, but this area would be accessible by airplane and motorboat. The National Park Service would actively identify locations in the Old Park that have ecological, wildlife, or other resource values that are at substantial risk of harm from airplane landings or motorboat use, and locations where these modes of access would cause unacceptable impacts to visitor safety. The National Park Service would close or otherwise manage motorized access to these areas as appropriate to alleviate the resource and safety concerns. In the park additions and preserve, airplane and motorboat access, and snowmachine access for traditional activities, would continue. If Congress considers additional wilderness designations for Denali, the National Park Service would propose that accommodation be made as necessary for recreational snowmachine access along the winter season Corridor management areas.

The National Park Service is committed to providing visitors to the national park and preserve with reasonable access for wilderness recreational activities, traditional activities, and for other purposes as described in ANILCA and other laws summarized in chapter 1. The National Park Service would generally allow independent, cross-country travel by any legal means, and would encourage access to the park and preserve by means of facilities (e.g., trails and marked routes) and services (e.g., commercial air taxi and guide services) as described in the Backcountry Facilities and Commercial Services portions of this plan. If it becomes necessary to manage travel in any area to achieve desired future resource and social conditions for an area, to reduce visitor conflict, or to protect visitor safety, the National Park Service would use the least restrictive mechanism or “tool” necessary to accomplish the goal. The National Park Service need not wait for conditions to match or exceed standards before taking management action; an expectation that conditions would exceed standards is sufficient to mandate a response. Restrictions and closures would be accomplished consistent with the process outlined in 43 CFR 36.11 and/or other relevant regulations.

Table 2-11 lists the tools that may be used to manage access when necessary, arranged in rough order from the least restrictive to the most restrictive. The park superintendent is free to pick whichever tool is required as long as the “least restrictive” criterion is heeded. There is no implication that the tools must be tried in the listed order and a failure elicited before trying the next one.

Table 2-11: Access Management Tools

1) Education	The National Park Service would provide printed material, public presentations, targeted presentations to user groups, and Internet-based programs, with the goal of actively involving visitors in helping the park achieve the standards for all management areas.
2) Increased enforcement of existing regulations	The National Park Service would prioritize enforcement of existing regulations to assist in achieving standards for management areas. For example, enforcement of the snowmachine speed limit or the sound level limits on motorized equipment could assist in achieving standards for sound quality.
3) Voluntary restrictions	The National Park Service would ask visitors to restrict their use voluntarily. Examples of such measures could include: voluntary registration; use of low-impact equipment; avoidance of certain areas of the park or preserve; or avoidance of areas during particular seasons or times of day. Voluntary registration would not require a permit and could be accomplished by trailhead register, phone or radio call-in, or the Internet.
4) Required registration	The National Park Service would require visitors to register. Visitors would be issued a permit that provides information about park rules and conditions for use necessary to protect park resources. Permit conditions could include minimum impact travel and camping requirements and resource protection requirements; however, a registration process would not limit the number of visitors or the type or amount of access. Registration is a means to gather information about visitor use levels and to ensure visitors receive necessary resource protection and safety information.
5) Technology requirements or other requirements governing means of access	To achieve management area standards, the National Park Service would place requirements on the means of access. For example, the NPS could require individuals to use technology that meets specific noise specifications if those individuals are accessing the park by snowmachine, motorboat, or airplane.
6) Management of commercial activity	The National Park Service would adjust concession contracts and other commercial use permits to govern use levels or direct authorized commercial activity to locations, seasons, or times of day as necessary to achieve management area standards.
7) Regulate numbers of visitors	The National Park Service would establish quotas for visitor numbers in areas of the park additions and preserve when the volume of use is high enough that other mechanisms are unlikely to achieve standards. Visitors would be required to register and carry a permit, and the number of available permits would be limited. This is the mechanism presently used to manage overnight backcountry use in the Old Park and parts of the Kantishna Hills.
8) Temporal restrictions	The National Park Service would restrict access to particular times of day, days of the week, or other unit of time, or the duration of access could be limited.
9) Temporary and permanent closures	Using the appropriate authorities, the National Park Service would temporarily or permanently close areas of the park and preserve to all types of visitor use or to specific modes of access.
10) Management authorities of other agencies	The National Park Service would seek assistance from cooperating entities, such as the Federal Aviation Administration or State of Alaska, to apply regulatory or other measures to protect park resource values and achieve management area standards.

Registration and Permit Systems

The National Park Service would study and deploy the most efficient, cost-effective, and user-friendly system for park visitors to register or obtain permits to access the park backcountry where required. The goals would be to: 1) provide safety and resource protection information to visitors before they enter the backcountry; 2) track the amount and type of visitor use; 3) improve the existing system; and 4) if necessary, expand the system to serve new activities and/or areas. Some options that would be considered include:

- Same-day and advance permits or registration
- One-time, seasonal, and annual registration
- Staffed desks or automated kiosks in Anchorage, Fairbanks, Trapper Creek, Talkeetna, Cantwell, Healy, or other locations
- Permits and registration by phone, Internet, or mail, or through transportation services (e.g., air taxis, Visitor Transportation System (VTS) bus system).

The National Park Service would impose new registration requirements only in areas where use levels are sufficient enough that user conflicts and/or resource damage are occurring or would occur and when other methods for obtaining accurate information on visitor use and conveying essential visitor safety and resource protection information are unlikely to be successful. It is likely that overnight use and winter day use from the Kahiltna Glacier east would meet these criteria in the near future. The National Park Service would begin a system of voluntary registration for airplanes landing in the Old Park. To test the feasibility of advance backcountry registration, an experimental system for advance registration would be employed for dispersed camping and camping at designated campsites in the Kantishna Hills.

The number of available permits for climbers attempting to climb Mount McKinley would be restricted to 1,500 during the main mountaineering season (April 1- August 1). The limit of 1,500 would be reevaluated 10 years after approval of the backcountry management plan.

Aircraft Overflights Working Group

The National Park Service would establish an aircraft overflights working group, which would include scenic air tour operators, commercial airlines, general aviation organizations, and other concerned parties. This group would develop voluntary measures for assuring the safety of passengers, pilots, and mountaineers and for achieving desired future resource conditions at Denali.

Cross-Country Travel

Except as otherwise specified in the management area descriptions and the Backcountry Facilities section, backcountry access and travel in Denali would continue without designated routes or constructed trails to allow for freedom to explore and to minimize signs of human presence. To prevent vegetation damage and social trail formation, the National Park Service would take the following actions:

- 1) Apply the Access Management tools specified for the situations described in Table 2-12.
- 2) Establish a social trails working group consisting of NPS staff, guided hiking concessioners, Murie Science and Learning Center staff and associated non-profit partners, and commercial services that provide access to the backcountry (by shuttle bus and air taxi). This group would address specific problem areas through coordinated action.

- 3) Develop Leave-No-Trace guidelines that are specific for Denali National Park and Preserve in consultation with the internal working group, NPS resource managers, and the Murie Science and Learning Center.

Table 2-12: Decision Guide for Addressing Social Trail Formation

Situation	Strategy	Application of Access Management Tools
No social trail formation; terrain allows dispersal or travel on durable surfaces (e.g., gravel river beds).	Keep use dispersed.	Provide Leave-No-Trace education for backcountry users to encourage continued dispersal and travel on durable surfaces.
No social trail formation at existing use levels, but terrain does not allow for dispersal or travel on durable surfaces.	Maintain use at level such that social trail formation does not begin.	Provide Leave-No-Trace education for backcountry users; manage guided groups to limit use; monitor level of use to detect increases; and limit number of visitors if necessary.
Social trails are present and are either stable or deteriorating, but additional dispersal is possible.	Encourage additional dispersal to lower levels of use on the social trail.	Provide Leave-No-Trace education for backcountry users and encourage voluntary dispersal coordinated through a social trails working group (see #2 below).
Social trails are present but stable at existing levels of use; little opportunity for dispersal.	Concentrate use on social trail and limit use sufficiently to prevent deterioration.	Educate visitors or restrict them to social trail, and limit numbers of visitors if necessary.
Social trails are present and are deteriorating; additional dispersal is not possible because of terrain.	Lower use levels until condition stabilizes.	Limit numbers of visitors or use temporary closures to restrict use.
<i>In addition, the National Park Service may temporarily close some areas around social trails to allow rehabilitation even if conditions are stable.</i>		

WILDERNESS MANAGEMENT

General Guidance

The National Park Service would manage all backcountry areas of the national park to protect wilderness resource values and provide opportunities for wilderness recreational activities, consistent with the direction of law and policy, with particular attention to the following:

- ANILCA Section 101 lists “preserve wilderness resource values” as a fundamental purpose of ANILCA.
- ANILCA Section 102(13) states that the term “wilderness” as used in ANILCA has the same definition as in the Wilderness Act.
- ANILCA Section 202(3)(a) states that a fundamental purpose of the Denali park and preserve additions is to provide continued opportunities, including reasonable access, for wilderness recreational activities.

As described in chapter 1, the Wilderness Act identifies two key components of wilderness character as

- 1) generally appearing to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; and
- 2) having outstanding opportunities for solitude or a primitive and unconfined type of recreation.

The qualities of “affected primarily by the forces of nature” and the “imprint of man’s work substantially unnoticeable” would be interpreted for Denali by the following characteristics:

- Absence of permanent human structures, including buildings, roads, trails, dams, and communications facilities
- Perpetuation of natural ecological relationships and processes and the continued existence of native wildlife populations in largely natural condition

Providing “opportunities for solitude” would include managing for visitor experiences with the following characteristics:

- Freedom from the reminders of society
- Privacy and isolation
- Absence of distractions, such as large groups, mechanization, unnatural noise, signs, and other modern artifacts

Providing a “primitive and unconfined type of recreation” would include recreation with these characteristics:

- Self-sufficiency, absence of support facilities or motorized transportation
- Direct experience of weather, terrain, and wildlife with minimal shelter or assistance from devices of modern civilization
- Lack of restriction on movement; freedom to explore in the way that is desirable given conditions of weather, terrain, and personal ability; ability to be spontaneous; minimal formal regulatory requirements

The above are the wilderness resource values that the National Park Service would seek to preserve at Denali. The NPS recognizes that ANILCA and other laws provide for exceptions in national park and wilderness management for particular uses or activities. Primary examples include:

- ANILCA 811 allows the use for subsistence purposes of snowmachines, motorboats, and other means of surface transportation traditionally employed for such purposes.
- ANILCA 1110(a) allows use of snowmachines, motorboats, and airplanes for traditional activities.
- ANILCA 1315(d) allows for the construction of a limited number of public use cabins or shelters in designated wilderness if necessary for the protection of public health and safety.
- ANILCA 1316(a) allows the establishment and use of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to the activities of taking fish and wildlife where such activities are allowed.
- Section 4(a-b) of the Wilderness Act establishes that the act does not change the statutory authority for which a park was created, nor does it lower the standards of any other act of Congress which might pertain to or affect such area, including the Antiquities Act or Historical Sites Act allowing for the preservation of historic structures.
- Section 4(c) of the Wilderness Act allows land managers the discretion to use motorized vehicles, use motorized equipment or motorboats, land aircraft, use other forms of mechanical transport, or construct structures or installations as necessary to meet the minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area).

In implementing this plan, and with future management actions, the National Park Service would, with every decision, forego actions that might have no seeming physical impact, but which would detract from the idea of wilderness as a place set apart, a place where human uses, convenience, and expediency do not dominate.

Group Size

The National Park Service would establish a maximum group size of 12 for backcountry areas of Denali for both private and guided groups, including guides. In Management Areas OP2 and D, the maximum group size would be six for both private and guided groups, including guides. The park superintendent could make an exception to the group size limit if that would benefit visitor safety or park resources. This limit does not apply in designated Hiker areas (trails) identified in the 1997 *Entrance Area and Road Corridor DCP*, but does apply on any trail that crosses into a backcountry area within the scope of this plan. Commercial and non-commercial groups would be required to have a group leader who is trained in Leave-No-Trace principles for tundra environments generally and Denali National Park and Preserve in particular. In all cases, larger groups (more than four) would be encouraged to disperse or stay on durable surfaces such as gravel river beds.

Human Waste

Removal of human waste from the park would be required in the following areas:

- The West Buttress Route on Mount McKinley above the 14,000 foot camp
- Campsites within one-half mile of air taxi landing locations on glaciers unless pit latrines or other waste disposal facilities are provided.

In other glaciated locations, including the West Buttress of Mount McKinley below the 14,000-foot camp, climbers would be encouraged, but not required, to remove their waste. Additional requirements for removing waste from glaciated areas could be imposed in high use areas if waste handling technology and techniques improve to make more widespread removal practical. The

National Park Service would emphasize education about human waste removal during climber orientation, during patrols, in working with mountaineering organizations such as the American Alpine Club, and in distributed publications.

The current rules on human waste in the Denali backcountry would remain in force. As described in the 2005 Superintendent's Compendium, these rules are as follows:

- *Human body waste will be deposited in cat-holes when the ground is not frozen, dug at least 100 feet from any surface freshwater source.*
- *Toilet paper will be burned or removed as trash.*
- *Persons engaged in any travel (such as skiing, snowshoeing, aircraft landings) or activities (such as mountaineering, climbing, flightseeing, camping) in a glacier environment, such as Mount McKinley and other peaks and glaciers within the park and preserve, must dispose of all human wastes according to the following guidelines:*
 - *Use pit latrines where they are provided by the National Park Service, such as those typically located at the 7,000-foot and 14,000-foot base camps along the West Buttress route, the Ruth Glacier in the vicinity of the Mountain House landing area, and elsewhere as provided.*
 - *At locations without pit latrines, bag all human waste (feces) and carry it out or place it in a deep crevasse. On steeper technical routes outside of the West Buttress, the bag can be tossed away from the climbing route or shovel feces off and away from the route.*

Climbing Tools

Power drills for climbing activities would be prohibited throughout the park additions and preserve.

The following guidance for fixed and removable anchors would be implemented:

Removable and fixed anchors, as well as other climbing equipment, must be used wisely and be closely managed in order to prevent the degradation of wilderness resources and character. When anchors are necessary for climber safety, removable anchors are desired and highly recommended. Fixed anchors should not be placed merely for convenience.

Fixed anchors (such as webbing, bolts, pitons, chains) currently in place may remain. They may be replaced or removed by individual climbers during a climb or by the National Park Service during park operations. Safety remains a responsibility of the climber. The National Park Service would not, as a policy or practice, monitor fixed anchors to evaluate their condition. When a climber determines the need for anchor placement or replacement, this must be accomplished in compliance with regulated and permitted standards (for example, power drills may not be used). If unable to do so, the route should remain unclimbed. New, bolt-intensive climbing routes, such as sport climbs and "bolt ladders," are not appropriate and would not be allowed.

Placement of new anchors may be allowed when necessary to enable a safe rappel when no other means of descent is possible; to enable emergency retreat; during self-rescue situations; and on new routes when ascending a route to connect terrain that is otherwise protected by removable anchors (for example, one crack system or other natural feature to another). Permanent bottom to top fixed anchor routes would not be allowed throughout the Denali backcountry, with the exception of the headwall (15,300-16,200 feet) on the West Buttress route of Mount McKinley.

COMMERCIAL SERVICES

The NPS Management Policies 10.2.2 mandates commercial visitor services planning for national parks and preserves. Commercial services may be authorized as concession contracts or commercial use authorizations. A decision to authorize a concession is to be based on a determination that the service:

- is necessary and appropriate for public use and enjoyment of the park in which it is located and identified needs are not, nor can they be, met outside park boundaries,
- will be provided in a manner that furthers the protection, conservation, and preservation of the environment and park resources and values, and
- will enhance visitor use and enjoyment without causing unacceptable impacts to park resources or values.

For the purposes of commercial visitor services planning in the Denali backcountry, these criteria would apply to all commercial visitor service authorizations. To be consistent with the purposes of the park and preserve and the objectives of this plan, the criteria would be interpreted for Denali as follows:

- Commercial services are necessary and/or appropriate in the Denali backcountry if they meet the following criteria:
 - They depend on the unique character and environment of the Denali backcountry, and the same experience cannot be found on nearby public lands.
 - They are consistent with the purposes of the park and preserve as described in chapter 1.
 - They do one of the following:
 - They provide access to remote areas of the park and preserve where the time or equipment necessary for the independent traveler to reach those locations would otherwise be prohibitively lengthy or expensive.
 - They provide education and inspiration related to wilderness resources and values.
 - They assist visitors in exploring the backcountry in areas or by means that require specialized knowledge (e.g., mountaineering, dog mushing).
- Commercial services are provided in a manner that furthers protection, conservation, and preservation when they do all of the following:
 - They teach and follow Leave-No-Trace principles for the sub-arctic wilderness environment.
 - They provide education relevant to preservation of wilderness resources and values.
 - They offer substantial benefits to the protection of the wilderness resources and values of the area.
- Commercial services do not cause unacceptable impacts to park resources or values when they do all of the following:
 - Group size, number of groups, and travel modes are consistent with management area designations and avoid impacts on vegetation, wildlife usage, and cultural resources of the area.
 - Groups follow Leave-No-Trace principles for the sub-arctic wilderness environment.
 - The activities are consistent with management area standards for solitude, natural sounds, and other wilderness characteristics for each management area.

In the park additions and preserve, if a guided commercial activity or non-commercial educational program takes place in an area where the numbers of visitors are limited, the allowable number of parties or visitors participating in the guided activity would be no more than 50% of the total potential use of the area during any visitor season (summer/winter) in order to allow for non-guided uses. In the Old Park, the number of parties or visitors participating in the guided activity would be no more than 25% of the total potential use of the area during any visitor season (summer/winter) where such use is allowed. Among commercial and educational programs, the programs provided directly by the National Park Service and the Murie Science and Learning Center would have priority for available capacity.

To avoid adverse affects to resources, the National Park Service would be conservative in making available guided activities and similar educational programs. When establishing new programs, the NPS would evaluate the impact of the new use before offering the program in additional locations or adding more programs to the same area.

All new commercial services, and both new and existing operators, would be required to meet the criteria listed above. Activities or services not described in this section could be considered only in the southern additions designated as Management Area A.

Commercial Airplane Landings

- Air taxi landings could occur throughout the park additions and preserve. To be considered an “air taxi” landing, the majority of passengers on the flight must either be dropped off or picked up from a day trip or overnight stay and passengers do not remain with their airplane while on the ground.
- “Scenic air tour landings” are distinguished by passengers remaining with their airplane while on the ground. Scenic air tour landings would be allowed on glaciers in all areas designated as Management Area A. Scenic air tour landings could also occur at the designated Portals on the Eldridge and Pika Glaciers; however, these areas would remain secondary and less used in accordance with their management area designation. Scenic air tour landings in these two areas would not occur when other landing locations are available and scenic air tour landings would be discouraged when climbers or mountaineers are present. These areas would be prioritized for monitoring and additional actions would be taken if management area standards are approached or exceeded. Scenic air tour landings could occur at Kahiltna Base Camp throughout the year. In all locations, landings for scenic air tours would be restricted to the hours between 9am and 9pm.

Guided Hiking

- Guided day-hiking in the Wonder Lake area and along the McKinley Bar trail would continue as described in the 1997 *Entrance Area and Road Corridor DCP*.
- Additional guided day-hiking could be continued in the western portion of the Old Park between Toklat River and Wonder Lake with access from Kantishna, limited to the same number of groups as at present (determined by average of last five years).
- Guided day-hiking in the Old Park east of Toklat River would be available only on the following entrance area trails:
 - The Rock Creek Trail and Roadside Trail between the Denali Visitor Center and Park Headquarters
 - The Bike Trail and Jonesville Trails between the Nenana River Bridge and the Denali Visitor Center

- The Nenana River and Triple Lakes trails when planned construction or rehabilitation is complete (see 1997 *Entrance Area and Road Corridor DCP*)
- The Savage Alpine Trail between Savage Campground and Savage River, only for those commercial groups staying at Savage Campground.
- In the portion of the Kantishna Hills where designated campsites are available, overnight camping by guided groups would be restricted to these campsites.
- Guided day-hiking and overnight backpacking could be considered throughout the park additions and preserve.

Guided Sport Hunting

The entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass. The change would take place immediately as an amendment to the existing sport-hunting concession contracts. See Map 5.

Other Activities

The following guided activities could continue to be authorized if the criteria described at the beginning of this Commercial Services section are met:

- Guided mountaineering on Mount McKinley and other peaks throughout the glaciated portions of the Alaska Range, (including lowland approaches), in the Old Park, park additions, and preserve
- Dog mushing expeditions in the Old Park, park additions, and preserve
- Winter day- or multi-day trips by ski or snowshoe in the park additions and preserve.

In addition, dog team freight hauling services in the Old Park, park additions, and preserve could continue to be authorized.

BACKCOUNTRY FACILITIES

Communication Facilities

Communications facilities would be considered on a case-by-case basis following the minimum requirement/minimum tool process. New structures would be attached to existing structures wherever possible. For administrative purposes, the National Park Service would phase in the use of satellite phones or similar technology in the backcountry to avoid the need for new temporary or permanent communication facilities in backcountry areas.

Trails

The National Park Service would designate Backcountry Hiker areas and (if needed) construct or improve the following trails:

- Some existing social trails within units 41, 42, and 43 in Kantishna, formalizing a trail system in this area
- From Eielson Visitor Center to Gorge Creek
- A loop from the water tower above Wonder Lake Campground up to the bench west of Wonder Lake and return
- From the Mount Healy overlook down a spur ridge to create a loop to the Taiga Trail
- From the west end of Thorofare Bluffs down to the Thorofare River bar.

No other new summer or winter trails would be added besides those identified in the 1997 *Entrance Area and Road Corridor DCP* and the 1997 *South Side Denali DCP*. Elsewhere in the park and preserve, the National Park Service would maintain a “no formal trails” policy.

Park Road

During winter months, snow on one lane of the park road would continue to be packed from the Headquarters gate to Mile 7 to allow maintenance activities that prevent the buildup of ice on the road in this section. Snow would not be removed from the road until necessary to prepare the road for summer season use. This section of the park road would be designated a Backcountry Hiker area during winter months.

Campsites

Up to 5 designated camping areas of 1-3 sites each would be created in conjunction with the Corridor and Backcountry Hiker areas in units 41, 42, and 43 in the Kantishna Hills. These sites would be farther from the park road than the areas commonly used by day-hikers. Food storage and/or sanitation facilities could be placed in the designated campsites.

Shelters and Cabins

The National Park Service would add visitor facilities at Park Headquarters, such as restrooms, plug-ins, and a warming hut, to support winter use. Otherwise, there would be no new facilities besides those already in approved plans.

Information Facilities

The National Park Service, in cooperation with other land management agencies, would operate a visitor contact station in the Cantwell/Broad Pass area. This facility would provide information and registration/permitting for year-round use of the park and preserve’s backcountry, with a particular focus on serving the needs of winter recreational visitors on the south side of the Alaska Range.

ADMINISTRATIVE AND SCIENTIFIC ACTIVITIES

To establish greater accountability and minimize impact to wilderness resource values throughout the park and preserve, all NPS-authorized administrative and research activity throughout the entire park and preserve backcountry would be subject to the minimum requirement/minimum tool process. When the minimum requirement/minimum tool is used, the potential disruption of wilderness character and the physical resource would be considered and given more weight than economic efficiency and convenience. Appendix E provides a sample tool for determining the minimum requirement/minimum tool.

Information and Education

Consistent with the protection of the park and preserve's wilderness character, information about backcountry travel would generally be provided before visitors enter the backcountry. This would minimize or eliminate the need for signs or other markers in the backcountry itself. Trip planning and safety information would be available at park visitor centers, Alaska Public Lands Information Centers, and at visitor facilities in Denali State Park. This information would also be available through the Internet and print materials that could be distributed nationally and internationally.

The National Park Service and its educational partners would provide wilderness education to all park visitors to assist in their understanding of the wilderness resource values protected in the Denali backcountry. Education would focus on interpreting the wilderness resource values articulated in the Wilderness Management section of this plan. Wilderness education could involve non-personal means in park visitor centers and Alaska Public Lands Information Centers, and also remotely via the Internet and print materials. Wilderness education in the backcountry would be provided entirely through personal services by concession, non-profit, or NPS guides.

Day use and overnight educational programs offered by the National Park Service, the Murie Science and Learning Center, and accredited educational institutions and non-profit organizations operating under a cooperative agreement with the National Park Service could be offered throughout the Old Park, park additions, and preserve. All educational programs taking place in the backcountry would be required to meet the criteria identified under Commercial Services.

Aviation

Within three years, the National Park Service would complete a plan for administrative and research use of aircraft in the wilderness, park additions, and preserve, which includes goals and specific objectives for minimizing helicopter and airplane use; specifies a methodology for accounting for NPS administrative and research air traffic; and provides criteria for determining when the use of aircraft meets the minimum requirement/minimum tool test.

Research and Resource Management

All NPS and external research would require a research permit that would be granted only if the parameters of the project meet the management area standards in the location(s) where the project is proposed. Research and resource management activities of the Alaska Department of Fish and Game would require advance consultation under the Master Memorandum of Understanding between the Department of Fish and Game and the National Park Service.

Administrative Camps

The existing patrol structure and administrative camps on Mount McKinley would be retained. There would be no additional administrative camps in the backcountry.

EASEMENTS AND BOUNDARY CHANGES

Easements

The National Park Service would initiate collaborative action with concerned and affected parties in the Cantwell area to acquire an easement over private lands to gain public access to the existing 17(b) easement (EIN 7a C5, DI, L) that provides a route across Ahtna, Inc. land from Cantwell to the park boundary near Windy Creek. The existing easement is 25 feet wide and allows travel by foot, dogsleds, animals, snowmachines, two- and three-wheeled vehicles, and small all-terrain vehicles. See Map 6.

Land Exchanges

The National Park Service would seek a land exchange with the State of Alaska (similar to a previously proposed exchange of land) that would realign the park boundary with the Tokositna, Coffee, and Ruth Rivers (see Map 7). As a result of the exchange, approximately 3,229 acres of Denali State Park land would be transferred to Denali National Park and Preserve, and approximately 2,822 acres of Denali National Park and Preserve land would be transferred to Denali State Park. Land to be transferred to the State of Alaska surrounds approximately 137 acres of privately owned inholdings.

An additional adjustment would be proposed for the area immediately north of Dutch Creek to provide a boundary that is more identifiable in the field and out of the potential placer mining in that floodplain. Completion of the exchanges and determination of actual boundaries and acreage would depend on the outcome of negotiations with the State of Alaska.

IMPLEMENTATION

The backcountry management plan would be implemented through regulations, step-down plans, commercial service authorizations, construction projects, and other means. Implementation actions and requirements are listed in Table 2-13. Public involvement and environmental compliance would be completed as necessary for all actions.

The plan would be implemented using adaptive management. Since the park recognizes the need to make decisions on the best available information, it would continue to gather new information, learn from previous efforts, and adapt the plan as necessary. The National Park Service would gather information from visitor registration and surveys, as well as from the monitoring of soundscapes, wildlife, and other resources. Adaptation and change to the plan can be expected as monitoring continues, new scientific data and information is obtained, new tools and equipment are developed, and new opportunities and circumstances arise.

An important part of adaptive management is ongoing monitoring associated with the resource and social conditions described under the Management Areas section above. The National Park Service would monitor for the general condition of the area not the exceptions. When monitoring shows that standards are exceeded or that trends indicate a risk that standards would be exceeded, the National Park Service would act to manage access and use employing the tools listed Table 2-11.

Another tool used in adaptive management would be the annual backcountry operational management plan, which would be implemented through existing regulations, the Superintendent’s Compendium, or additional special regulations if necessary. This operational plan would provide specific guidance for the general actions authorized in the final backcountry management plan, and the guidance would be updated yearly to reflect current information and conditions. Topics addressed would include:

- Permit conditions
- Unit quotas
- Length-of-stay and other restrictions
- Closures
- Operation of registration and permit systems

Table 2-13: Implementation Actions

Backcountry Implementation Advisory Committee	Charter an advisory committee under the Federal Advisory Committee Act (FACA) to advise the NPS on plan implementation. Subcommittees would address specific issues including monitoring, aircraft overflights, and mitigation for hiking impacts as described in the plan.
Monitoring	Develop and implement a comprehensive monitoring plan for the indicators identified by the plan. The development of the monitoring plan would take place entirely or in part in conjunction with the development of the park’s Resource Stewardship Plan and the development of monitoring protocols for the Central Alaska Network’s Vital Signs Monitoring Plan.

Table 2-13: Implementation Actions, continued

<p>Regulations</p>	<p>Promulgate the following special regulations in 36 CFR 13.63:</p> <ul style="list-style-type: none"> • Establish group size limits of 6 and 12 where appropriate • Establish seasonal climbing limit on Mount McKinley • Require removal of human waste at certain locations in climbing and mountaineering areas • Prohibit use of power drills for mountaineering activities throughout the park additions and preserve <p>In addition, the NPS would document the need for management action and promulgate regulations if necessary for the following:</p> <ul style="list-style-type: none"> • Required registration for overnight use or winter day use in the southern park additions east of and including the Kahiltna Glacier • Closure of sensitive locations in the Old Park to motorized access
<p>Commercial Services</p>	<p>Issue prospectuses for commercial air taxi and scenic air tour glacier landing services that reflect plan provisions.</p> <p>Revise description for air taxi Incidental Business Permits (IBP) to reflect plan provisions, or use a Commercial Use Authorization when regulations are available.</p> <p>Issue prospectuses for commercial guided hiking in the Kantishna Hills that reflect plan provisions.</p> <p>Develop a commercial visitor service authorization for guided hiking on designated entrance area trails.</p> <p>Revise IBP area to produce individual maps for air taxi, guided day-hiking, guided overnight hiking, and guided mountaineering services per direction in the plan.</p> <p>Amend guided sport hunting operating plans to reflect approved areas.</p>
<p>Backcountry Operations</p>	<p>Obtain funding for additional patrol and visitor services staff to implement plan provisions.</p> <p>Develop backcountry operational plan and annual updates.</p> <p>Study and implement improvements to backcountry registration system, including advance registration procedure for overnight camping in the Kantishna Hills. Include a voluntary process for registering airplane landings in the Old Park.</p> <p>Identify and map winter corridors in the Dunkle Hills area.</p> <p>Purchase satellite phones and implement procedures for patrol use of phones.</p>
<p>Facility Development</p>	<p>Complete plan for Kantishna trail and backcountry campsite development. Obtain funding and construct.</p> <p>Plan and construct other trails identified in this plan.</p> <p>Add winter backcountry support facilities at Headquarters.</p> <p>Plan and construct Broad Pass visitor contact station. This item would require development of agency partnerships, specific definition of scope, and site selection prior to environmental compliance or other action.</p>
<p>Implementation Plans</p>	<p>Complete plan for NPS aviation management.</p> <p>Obtain easement for access to the Cantwell-Windy Creek 17(b) easement. As necessary, develop ancillary facilities such as trailhead and parking.</p>
<p>Land Exchange</p>	<p>Complete land exchange with the State of Alaska.</p>

ALTERNATIVES CONSIDERED BUT REJECTED

Access

- Limit the number of available permits for the West Buttress route, but do not restrict climbing on other routes. This option was considered but dismissed for safety reasons. There is a concern that if the West Buttress were at capacity, climbers who lack the necessary experience would be tempted to try a route beyond their ability. Also, the limit of 1,500 climbers per season was selected because that is the maximum number that mountaineering rangers believe they could manage with their existing program and facilities, based on several years of experience. The existing program and facilities presently serve all climbers on Mount McKinley, not just those on the West Buttress.
- Establish flight corridors or flight-free zones over the park. The National Park Service lacks the statutory authority to establish flight free zones or flight corridors. However, the backcountry management plan includes recognition that the National Park Service could work through the regulatory authorities of other agencies to manage access as needed to achieve management area standards if other mechanisms were inadequate.
- Employ snow coaches for winter access in the park additions instead of individual snowmachines. Snow coaches require well-groomed surfaces of heavily packed snow, and are typically used only on top of existing roadways. They are not suitable for cross-country travel in the park additions.
- Close the park additions to all snowmachine use. In ANILCA, Congress allowed for ongoing motorized access to the 1980 park additions for certain purposes as detailed in chapter 1. While there are unresolved differences in interpretation of the law, the National Park Service believes that there are valid legal purposes for using snowmachines in the park additions and preserve and that closing the park additions to all snowmachine use would be contrary to the intent of Congress.

Wilderness Management

- Require human waste removal requirement on the entire West Buttress. The National Park Service acknowledges that human waste is an issue along the entire West Buttress route. However, at 14,000 feet and below there are options for waste management (such as crevasse disposal and latrines) that make human waste removal less critical. The NPS mountaineering staff are concerned that the resources and logistics necessary for waste removal from the entire West Buttress would be substantial, would compete with other needs, and might be unachievable. For that reason, the plan specifies that waste removal below 14,000 feet would be encouraged but not required.

Commercial Services

- Provide for commercial airplane landings to support mountaineering activities on the north side of the Alaska Range. There is no need for airplane support for climbers on the north side of the Alaska Range, because the National Park Service already authorizes a concessioner to

deliver supplies to the base of Mount McKinley by dog team during winter months. Climbing parties hike or ski from the park road and retrieve their supplies before starting their climbs (see chapter 3, Visitor Use). This is a unique challenge and opportunity that is consistent with the wilderness values of the Old Park and also is consistent with historical mountaineering and exploration of the Old Park. Several climbing parties each year ascend Mount McKinley or other peaks from the north side.

Backcountry Facilities

- Extend existing hiking trail at Savage River north along the river to State land. This action was dismissed because it conflicts with the retained policy of not establishing formal trails in the backcountry in order to preserve the unique wilderness character and wilderness experience at Denali. Although exceptions have been made to provide visitor opportunities at major visitor nodes or to address resource damage, the suggested trail meets neither criterion.
- Construct public use cabins within the boundaries of the national park and preserve. ANILCA provides the option for constructing public use cabins within wilderness areas if necessary for public health and safety. During public scoping and public review of the original draft plan, no one identified public health and safety reasons for new public use cabins. Because construction of new structures otherwise conflicts with legal and policy mandates, they were not considered among the alternatives. The alternatives do explore the possibility of collaboration with the State of Alaska to construct public use cabins near, but outside of, park and preserve boundaries.

Table 2-14: Summary Table of Alternatives

OVERVIEW					
Topic	Alternative 1 (no-action)	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
Overview	<p>The National Park Service would continue the present management direction, guided by the 1986 <i>General Management Plan</i>, the 1997 <i>Entrance Area Road Corridor Development Concept Plan</i>, the 1997 <i>South Side Denali Development Concept Plan</i>, and the 1997 <i>Strategic Plan</i>, and backcountry management plans from 1976 and 1982. Recreational use and access patterns would continue to develop and the agency would respond as necessary on a case-by-case basis. No new services or facilities would be developed to meet increased levels of use in the backcountry, except for those identified in the Entrance Area or South Side plans.</p>	<p>This alternative would distinguish a unique Denali experience based on dispersed use in a wilderness landscape with few sights or sounds of people or mechanized civilization. There would be few services, facilities, or signs of management presence. This alternative would most clearly distinguish the backcountry experience in Denali from the surrounding public lands, providing a place primarily for visitors who are very self-reliant, and including many opportunities for extended expeditions in very remote locations. Backcountry users seeking other experiences would find those opportunities on neighboring lands.</p>	<p>This alternative would provide a variety of wilderness recreational activities by establishing areas to serve those visitors who want to experience the wilderness resource values of the Denali backcountry but require services, assistance, or short time-commitments. The areas would be the minimum necessary to provide these experiences based on present demand and would be focused along the park road in the Old Park and Kantishna and at the Ruth Glacier and Kahiltna Base Camp. The majority of the backcountry would be managed for dispersed, self-reliant travel and would include opportunities for extended expeditions in very remote locations.</p>	<p>This backcountry management plan would guide the National Park Service in providing opportunities for a variety of wilderness recreational activities and experiences while recognizing and protecting the premier wilderness resource values of the entire backcountry. Areas in the Dunde Hills and around the Ruth and Tokositna Glaciers on the south side of the Alaska Range would be managed for those visitors who want to experience the wilderness resource values or other resource values of the Denali backcountry but require services or assistance, lengthy time commitment. Areas along the park road in the Old Park and the Kantishna Hills would provide accessible opportunities for short- or long-duration wilderness recreational activities with only limited options for guidance or assistance the farther one gets from the park road. The remainder of the backcountry would be managed for dispersed, self-reliant travel, and would include opportunities for extended expeditions in very remote locations.</p>	<p>This alternative would create two distinct geographic areas that provide different kinds of visitor experiences in the Denali backcountry. The Old Park and the Denali additions north of the Alaska Range would be primarily managed for dispersed, self-reliant travel although no areas would be managed specifically to preserve opportunities for extended expeditions in remote locations. Areas along the park road and in Kantishna that presently receive a relatively high volume of use and large parts of the additions south of the Alaska Range would be managed for a greater intensity and variety of appropriate recreational activities and would have more visible management presence and opportunities for more services and facilities.</p>

MANAGEMENT AREAS																																																																																																																													
Topic	Alternative 1 (no-action)	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5																																																																																																																								
Management Areas	There would be no new management areas defined for the backcountry. The entire backcountry would continue to be designated as a "Natural Area", described by the 1986 <i>General Management Plan</i> .	<p>Alternatives 2, 3, 4, and 5 would designate new management areas throughout the entire backcountry to accommodate different intensities of use as allowed by indicators and standards. Indicator categories include trail and campsite disturbance, evidence of modern human use, landscape modifications, litter and human waste, natural sound disturbance, encounters with other people, encounters with large groups, camping density, accessibility, and management presence. The NPS preferred alternative also includes an indicator for wildlife population, demographics, and distribution. See Maps 2-1, 2-2, 2-3, and 2-5 in the Revised Draft EIS and Map 2 in this Final EIS.</p> <p>Proportion of Park & Preserve in Each Management Area</p> <table border="1"> <thead> <tr> <th>Mgmt Area</th> <th>Acres</th> <th>% back-country</th> </tr> </thead> <tbody> <tr><td>A</td><td>0</td><td>0%</td></tr> <tr><td>B</td><td>222,782</td><td>4%</td></tr> <tr><td>C</td><td>477,696</td><td>8%</td></tr> <tr><td>D</td><td>447,539</td><td>8%</td></tr> <tr><td>E</td><td>2,735,412</td><td>46%</td></tr> <tr><td>OP1</td><td>1,408,886</td><td>24%</td></tr> <tr><td>OP2</td><td>737,409</td><td>11%</td></tr> <tr><td>TOTAL</td><td>6,028,202</td><td>100%</td></tr> <tr><td>Special use area</td><td>0</td><td><1%</td></tr> </tbody> </table>	Mgmt Area	Acres	% back-country	A	0	0%	B	222,782	4%	C	477,696	8%	D	447,539	8%	E	2,735,412	46%	OP1	1,408,886	24%	OP2	737,409	11%	TOTAL	6,028,202	100%	Special use area	0	<1%	<p>Proportion of Park & Preserve in Each Management Area</p> <table border="1"> <thead> <tr> <th>Mgmt Area</th> <th>Acres</th> <th>% back-country</th> </tr> </thead> <tbody> <tr><td>A</td><td>257,183</td><td>4%</td></tr> <tr><td>B</td><td>519,164</td><td>9%</td></tr> <tr><td>C</td><td>370,147</td><td>6%</td></tr> <tr><td>D</td><td>1,809,987</td><td>13%</td></tr> <tr><td>E</td><td>925,425</td><td>33%</td></tr> <tr><td>OP1</td><td>1,408,886</td><td>24%</td></tr> <tr><td>OP2</td><td>737,409</td><td>11%</td></tr> <tr><td>TOTAL</td><td>6,028,202</td><td>100%</td></tr> <tr><td>Special use area</td><td>30,928</td><td><1%</td></tr> </tbody> </table>	Mgmt Area	Acres	% back-country	A	257,183	4%	B	519,164	9%	C	370,147	6%	D	1,809,987	13%	E	925,425	33%	OP1	1,408,886	24%	OP2	737,409	11%	TOTAL	6,028,202	100%	Special use area	30,928	<1%	<p>Proportion of Park & Preserve in Each Management Area</p> <table border="1"> <thead> <tr> <th>Mgmt Area</th> <th>Acres</th> <th>% back-country</th> </tr> </thead> <tbody> <tr><td>A</td><td>358,256</td><td>6%</td></tr> <tr><td>B</td><td>962,244</td><td>16%</td></tr> <tr><td>C</td><td>312,469</td><td>5%</td></tr> <tr><td>D</td><td>2,242,454</td><td>38%</td></tr> <tr><td>E</td><td>0</td><td>0%</td></tr> <tr><td>OP1</td><td>1,408,886</td><td>24%</td></tr> <tr><td>OP2</td><td>737,409</td><td>11%</td></tr> <tr><td>TOTAL</td><td>6,028,202</td><td>100%</td></tr> <tr><td>Special use area</td><td>150,269</td><td>2.5%</td></tr> </tbody> </table>	Mgmt Area	Acres	% back-country	A	358,256	6%	B	962,244	16%	C	312,469	5%	D	2,242,454	38%	E	0	0%	OP1	1,408,886	24%	OP2	737,409	11%	TOTAL	6,028,202	100%	Special use area	150,269	2.5%	<p>Proportion of Park & Preserve in Each Management Area</p> <table border="1"> <thead> <tr> <th>Mgmt Area</th> <th>Acres</th> <th>% back-country</th> </tr> </thead> <tbody> <tr><td>A</td><td>1,066,390</td><td>18%</td></tr> <tr><td>B</td><td>3,943,671</td><td>66%</td></tr> <tr><td>C</td><td>0</td><td>0%</td></tr> <tr><td>D</td><td>1,018,140</td><td>16%</td></tr> <tr><td>E</td><td>0</td><td>0%</td></tr> <tr><td>OP1</td><td>0</td><td>0%</td></tr> <tr><td>OP2</td><td>0</td><td>0%</td></tr> <tr><td>TOTAL</td><td>6,028,202</td><td>100%</td></tr> <tr><td>Special use area</td><td>161,695</td><td>3%</td></tr> </tbody> </table>	Mgmt Area	Acres	% back-country	A	1,066,390	18%	B	3,943,671	66%	C	0	0%	D	1,018,140	16%	E	0	0%	OP1	0	0%	OP2	0	0%	TOTAL	6,028,202	100%	Special use area	161,695	3%
	Mgmt Area	Acres	% back-country																																																																																																																										
A	0	0%																																																																																																																											
B	222,782	4%																																																																																																																											
C	477,696	8%																																																																																																																											
D	447,539	8%																																																																																																																											
E	2,735,412	46%																																																																																																																											
OP1	1,408,886	24%																																																																																																																											
OP2	737,409	11%																																																																																																																											
TOTAL	6,028,202	100%																																																																																																																											
Special use area	0	<1%																																																																																																																											
Mgmt Area	Acres	% back-country																																																																																																																											
A	257,183	4%																																																																																																																											
B	519,164	9%																																																																																																																											
C	370,147	6%																																																																																																																											
D	1,809,987	13%																																																																																																																											
E	925,425	33%																																																																																																																											
OP1	1,408,886	24%																																																																																																																											
OP2	737,409	11%																																																																																																																											
TOTAL	6,028,202	100%																																																																																																																											
Special use area	30,928	<1%																																																																																																																											
Mgmt Area	Acres	% back-country																																																																																																																											
A	358,256	6%																																																																																																																											
B	962,244	16%																																																																																																																											
C	312,469	5%																																																																																																																											
D	2,242,454	38%																																																																																																																											
E	0	0%																																																																																																																											
OP1	1,408,886	24%																																																																																																																											
OP2	737,409	11%																																																																																																																											
TOTAL	6,028,202	100%																																																																																																																											
Special use area	150,269	2.5%																																																																																																																											
Mgmt Area	Acres	% back-country																																																																																																																											
A	1,066,390	18%																																																																																																																											
B	3,943,671	66%																																																																																																																											
C	0	0%																																																																																																																											
D	1,018,140	16%																																																																																																																											
E	0	0%																																																																																																																											
OP1	0	0%																																																																																																																											
OP2	0	0%																																																																																																																											
TOTAL	6,028,202	100%																																																																																																																											
Special use area	161,695	3%																																																																																																																											
Corridors	No areas of the park and preserve would receive the Corridor designation.	<p>Year-round Corridor areas would be designated on the Kantishna and Muddy Rivers and the lower Tokositna River (61.5 miles).</p>	<p>Year-round Corridor areas would be designated on the Kantishna and Muddy Rivers (114 miles). Summer season Corridor management areas would be designated on Skyline, Moose Creek, and Eldorado mining access routes within Management Area A in Kantishna (14 miles). Winter season corridors to the Old Park boundary would be established in the Broad Pass/Dunkle Hills area and to the toes of the Ruth, Tokositna, and Kanikula glaciers from the Tokositna River (21 miles).</p>	<p>Summer season Corridors would be designated as follows:</p> <ul style="list-style-type: none"> Kantishna and Muddy Rivers (56 mi.) lower Tokositna River (4 mi.) Skyline and Moose Creek former mining access routes in Kantishna (10 mi.). <p>If demand is sufficient, the following winter season Corridor management areas could also be designated:</p> <ul style="list-style-type: none"> 3 Corridors from the southern park boundary to the Old Park boundary near West Fork Chulitna River, Bull River, and Cantwell Creek (12.5 mi.). lower Tokositna River (4 mi.) upper Tokositna River to the mouth of Wildhorse Creek (3 mi.). <p>See Map 3.</p>	<p>Year-round Corridor areas would be designated on the Kantishna and Muddy Rivers, the Tokositna River, and both the east and west forks of the Yentna River (114 miles). Summer season Corridor management areas would be designated on Skyline, Moose Creek, and Eldorado mining access routes within Management Area A in Kantishna (14 miles). Winter season corridors to the Old Park boundary would be established in the Broad Pass/Dunkle Hills area and to the toes of the Ruth, Tokositna, and Kanikula glaciers from the Tokositna River (21 miles). If demand is sufficient, the NPS would also establish a Corridor to Kantishna from the Sushana River (56 miles).</p>																																																																																																																								

<p>Special Use Areas</p>	<p>No new areas of the park and preserve would receive Special Use Area designation.</p>	<p>The West Buttress Special Use Area would be designated to include the entire West Buttress route on Mount McKinley from the Old Park boundary to the summit.</p> <p>The Ruth Glacier Special Use Area would be designated to include portions of the Ruth Amphitheater, Ruth Gorge, and West Fork Ruth Glacier.</p>	<p>The West Buttress Special Use Area would be designated to include the entire West Buttress route on Mount McKinley from the Old Park boundary to the summit.</p>
<p>Portals</p>	<p>No areas of the park and preserve would receive the Portal designation.</p>	<p>Portals would be designated on the Pika Glacier, Coffee Glacier, Buckskin Glacier, Eldridge Glacier, and upper Tokositna Glacier.</p> <p>Major Landing Areas would be designated at Kahiltma Base Camp, southwest fork Kahiltma Glacier, and Ruth Amphitheater.</p>	<p>Portals would be designated on the Pika Glacier, Coffee Glacier, Buckskin Glacier, Eldridge Glacier, and upper Tokositna Glacier.</p> <p>Major Landing Areas would be designated at Kahiltma Base Camp and Ruth Amphitheater.</p> <p>See Map 4.</p>

ACCESS					
Topic	Alternative 1 (no-action)	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
General Concept	<p>The National Park Service would continue to manage access in the national park and preserve using only existing guidance from management policies and general management plans. There would be no change in the management of motorized access into Denali by airplane, snowmachine, or motorboat. Airplanes could continue to land in the Old Park and the additions. Snowmachines could be used for traditional activities throughout the park additions and preserve, and no guidance would be provided on the definition of the term “traditional activities” for future regulation.</p>	<p>Recreational access to the park and preserve would be by foot from the park road, designated Portals within park boundaries, and airplane landing areas or roads outside of park boundaries.</p> <p>The National Park Service would promulgate a special regulation that 1) defines “traditional activities” for all areas of the park and preserve and for all modes of access as “traditional activities” were defined in 2000 for snowmachine access in the Old Park; 2) modifies current regulations that permit airplane and motorboat use and other forms of nonmotorized transportation for any purpose to follow the language of Section 1110(a) which specifically restricts these modes of access, as well as snowmachines, to only traditional activities; 3) allows airplane landings at designated Portals and the McKinley Park and Kantishna airstrips.</p>	<p>Access to the Old Park would be by foot from the park road and roads and airplane landing areas outside the Old Park boundary. Recreational access to the park additions and preserve would be by foot, by airplane to glaciers and existing landing areas, by motorboat, and by snowmachine along designated access corridors.</p> <p>The National Park Service would seek legislation to exempt the “Old Park” from ANILCA 1110(a), returning motorized access to the level legally allowed before 1980. Existing regulations would be modified to remove the general allowance for airplane landings and motorboat use for any purpose at Denali. The National Park Service would close the park additions and preserve to recreational snowmachine access through a rule-making that defines “traditional activities” for snowmachine access in these areas similar to the way that it is defined for the Old Park. It would allow for recreational snowmachine access along the winter season Corridor management areas.</p>	<p>Recreational access to the Old Park would continue to be managed to emphasize non-motorized access, but this area would be accessible by airplane and motorboat.</p> <p>The National Park Service would actively identify locations in the Old Park that have ecological, wildlife, or other resource values that are at substantial risk of harm from airplane landings or motorboat use, and locations where these modes of access would cause unacceptable impacts to visitor safety. The NPS would close or otherwise manage motorized access to these areas as appropriate to alleviate the resource and safety concerns.</p> <p>In the park additions and preserve, airplane and motorboat access, and snowmachine access for traditional activities, would continue.</p>	<p>Recreational access to the Old Park would continue to be managed to emphasize non-motorized access, but this area would be accessible by airplane and motorboat.</p> <p>In the park additions and preserve, airplane and motorboat access, and snowmachine access for traditional activities, would continue.</p>
Aircraft	<p>The National Park Service would not form an advisory group to address resource concerns arising from aircraft overflights.</p>	<p>The National Park Service would establish an Aircraft Overflights Working Group to develop voluntary measures for assuring visitor safety and achieving management area standards.</p>			

<p>Cross-Country Travel</p>	<p>The National Park Service would not form an internal working group for addressing resource impacts of hiking in the backcountry.</p>	<p>The National Park Service would establish a working group to address vegetation damage and social trail formation resulting from backcountry hiking. NPS would institute a decision guide for addressing specific types of trail formation impacts and the working group would develop Leave-No-Trace guidelines specific to Denali.</p>	<p>The National Park Service would propose that accommodation be made as necessary for recreational snowmachine access along the winter season Corridor management areas.</p>
<p>Access-Wilderness Proposal</p>	<p>If Congress considers additional wilderness designations for Denali, the National Park Service would not seek special accommodation for the continuation of snowmachine access for non-traditional activities.</p>	<p>If Congress considers additional wilderness designations for Denali, the National Park Service would not seek special accommodation for the continuation of snowmachine access for non-traditional activities.</p>	<p>If Congress considers additional wilderness designations for Denali, the National Park Service would propose that accommodation be made as necessary for recreational snowmachine access along the winter season Corridor management areas.</p>
<p>Registration</p>	<p>There would be no new registration requirements, nor would the NPS provide for advanced registration in the Kantishna Hills.</p>	<p>Registration would be required for</p> <ul style="list-style-type: none"> o day-hiking outside of Backcountry Hiker areas in the Old Park during summer months o day use in the southern park additions east of and including the Kahiltma Glacier during winter months o all overnight camping in the park and preserve. <p>To test the feasibility of advance backcountry registration, an experimental system for advance registration would be employed for dispersed camping and camping at designated campsites within the Corridor Management Areas and Management Area A within the Kantishna Hills.</p>	<p>The National Park Service would impose new registration requirements only in areas where use levels are sufficient that user conflicts and/or resource damage are occurring or would occur, and when other methods for obtaining accurate information on visitor use and conveying essential visitor safety and resource protection information are unlikely to be successful.</p> <p>The National Park Service would begin a system of voluntary registration for airplanes landing in the Old Park.</p> <p>To test the feasibility of advance backcountry registration, an experimental system for advance registration would be employed for dispersed camping and camping at designated campsites in the Kantishna Hills.</p>
<p>Climbing & Mountaineering</p>	<p>An unlimited number of climbers could continue to register to climb Mount McKinley in a season.</p>	<p>The number of available permits for climbers attempting Mount McKinley would be restricted to existing levels (1,300) for all routes during the main mountaineering season (April 1 - August 1).</p>	<p>The number of available permits for climbers attempting to climb Mount McKinley would be restricted to 1,500 during the main mountaineering season (April 1 - August 1). The limit of 1,500 would be reevaluated in 10 years after approval of the plan.</p> <p>There would be no annual limits established for the number of climbers attempting to climb Mount McKinley while the National Park Service gathers additional information.</p>

WILDERNESS MANAGEMENT					
Topic	Alternative 1 (no-action)	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
General Guidance	The National Park Service would continue to manage wilderness using only existing service-wide policy and park plans.	The National Park Service would manage all backcountry areas of the national park to protect wilderness resource values and provide opportunities for wilderness recreational activities, consistent with the direction of law and policy, and would clarify the meaning of Wilderness Act terms for Denali.			
Group Size	Decisions about group size would continue to be made on a case-by-case basis for guided and educational groups. There would be no group size limit for private parties.	A group size limit of 12 (including guides) would be established for all users and all backcountry areas.		A group size limit of 12 (including guides) would be established for all users and all backcountry areas. In Management Areas OP2 and D the maximum group size would be 6. The park superintendent could make an exception to the group size limit if there would be a benefit to visitor safety or park resources.	A group size limit of 12 (including guides) would be established for all users and all backcountry areas.
Human Waste	There would be no new requirement for carrying out human waste from the West Buttress route or around glacier landing areas.	Removal of human waste would be required in the following areas: <ul style="list-style-type: none"> the West Buttress route on Mount McKinley above the 14,000 foot camp campsites within 1/2 mile of air taxi landing locations on glaciers unless pit latrines or other waste disposal facilities are provided. 			
Climbing Tools	There would be no new prohibition on power drills as a climbing tool, nor a policy on fixed and removable anchors other than those provided for by national policy and regulation.	Power drills would be prohibited throughout the park additions and preserve. A policy on fixed and removable anchors would be implemented.			

COMMERCIAL SERVICES				
Topic	Alternative 1 (no-action)	Alternative 2	Alternative 3	
General Guidance	<p>Existing regulation and policy described in chapter 1 would guide commercial services decisions in the backcountry. The National Park Service would not clarify the interpretation of criteria for providing commercial services at Denali. There would be no guidance on the allocation of capacity in the backcountry between independent travelers, educational programs, and guided activities.</p>	<p>The National Park Service would clarify the definitions of commercial services criteria and apply to both concession contracts and commercial use authorizations.</p> <p>In the park additions and preserve, if a guided activity or educational program takes place in an area where the numbers of visitors are limited, the allowable number of parties or visitors participating in the guided or educational activity generally would be less than a majority of the total potential use of the area in order to allow for non-guided uses. In the Old Park, the number of parties or visitors participating in the guided or educational activity would generally be less than 25% of the total potential use of the area in all alternatives where such use is allowed.</p> <p>The National Park Service would prioritize available capacity for guided activities and educational programs in the following priority order:</p> <ol style="list-style-type: none"> 1. Ranger-led programs offered by the National Park Service 2. Educational programs of the Murie Science and Learning Center 3. Accredited educational programs and programs of non-profit educational organizations that operate in the park under a cooperative agreement 4. The programs of other entities, including other non-profit organizations, schools, and for-profit businesses. 	<p>The National Park Service would clarify the definitions of commercial services criteria and apply to both concession contracts and commercial use authorizations.</p> <p>In the park additions and preserve, if a guided commercial activity or non-commercial educational program takes place in an area where the numbers of visitors are limited, the allowable number of parties or visitors participating in the guided activity would be no more than 50% of the total potential use of the area in order to allow for non-guided uses. In the Old Park, the number of parties or visitors participating in the guided or educational activity would be no more than 25% of the total potential use of the area in all alternatives where such use is allowed.</p> <p>Programs provided directly by the NPS and Murie Science and Learning Center would have priority for available capacity.</p>	<p style="text-align: center;">Alternative 4 - Modified (NPS preferred)</p> <p>Same as alternatives 2 and 3.</p>
		<p>Activities or services not described in this Commercial Services section could be considered only in the southern additions designated as Management Area A.</p>	<p>Activities or services not described in this Commercial Services section could be considered only in areas designated as Management Area A.</p>	

COMMERCIAL SERVICES continued					
Topic	Alternative 1 (no-action)	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
Ongoing Activities			<p>In the park additions and preserve, excluding the Kantishna Hills between the Toklat and McKinley Rivers, additional commercial authorizations could be awarded to operators for the following activities:</p> <ul style="list-style-type: none"> • Air taxi operator, including big game transport, except on glaciers covered by existing concessions contracts • Guided mountaineering • Winter day- or multi-day trips by ski, snowshoe, or dog team. 	<p>The following guided activities could continue to be authorized:</p> <ul style="list-style-type: none"> • Guided mountaineering on Mount McKinley and other peaks throughout the glaciated portions of the Alaska Range, including lowland approaches, in the Old Park, park additions, and preserve • Dog mushing expeditions in the Old Park, park additions, and preserve • Winter day- or multi-day trips by ski or snowshoe in the park additions and preserve. <p>In addition, dog team freight hauling services in the Old Park, park additions, and preserve could continue to be authorized.</p>	<p>In the park additions and preserve additional commercial authorizations could be awarded to operators for the following activities:</p> <ul style="list-style-type: none"> • Air taxi operator, including big game transport, except on glaciers covered by existing concessions contracts • Guided mountaineering • Winter day- or multi-day trips by ski, snowshoe, or dog team.
Commercial Airplane Landings	<p>There would continue to be no limits on the number of commercial airplane landings nor additional limits on where landings can occur in the park additions and preserve.</p>	<p>Commercial air taxi landings would be allowed at all designated Portals for the purpose of dropping off or picking up backcountry visitors who remain in the park overnight. Scenic air tour landings would be allowed only at the Ruth Amphitheater and at Kahiltna Base Camp after July 1, but the number of landings would be limited to 2001 numbers: 1,900 in the Ruth Amphitheater and 200 at Kahiltna Base Camp. Landings would be restricted to the hours of 9am to 9pm.</p>	<p>Air taxi landings could occur throughout the park additions and preserve. Scenic air tour landings would be allowed only on glaciers within Management Area A. Landings would be restricted to the hours of 9am to 9pm.</p>	<p>Air taxi landings could occur throughout the park additions and preserve. Scenic air tour landings would be allowed on glaciers in all areas designated as Management Area A. Scenic air tour landings could also occur at designated landing areas on the Eldridge and Pika Glaciers, however these areas would remain secondary and less-used in accordance with their management area designation. In all locations, landings for scenic air tours would be restricted to the hours between 9am and 9pm. Scenic air tour landings could occur at Kahiltna Base Camp throughout the year.</p>	<p>Air taxi landings could occur throughout the park additions and preserve. Scenic air tour landings would be allowed on glaciers in all areas designated as Management Area A. There would be no prohibition on landing at Kahiltna Base Camp prior to July 1.</p>

<p>Guided hiking in the Old Park would stay at the existing levels. There would be no guided backpacking in the Kantishna Hills area. No guided hiking would be allowed on entrance area trails.</p>	<p>In the Old Park, there would be no guided day-hiking or overnight backpacking. Existing concession-operated guided hiking opportunities would be phased out at the time of contract reauthorizations.</p> <p>There would be no concession-operated guided day-hiking or overnight backpacking in the park additions and preserve north of the Toklat River. An exception is the Kantishna Hills units designated as Management Area B, where the same level of guided day-hiking activity with would be allowed as at present. Guided day-hiking and overnight backpacking could be authorized in areas of the park additions and preserve south of the Alaska Range.</p>	<p>Guided day-hiking could be offered throughout the park additions and preserve. Guided day-hiking could be offered in the Old Park with no more than the current number of guided groups each season and using a similar proportion of off-trail to on-trail (McKinley Bar Trail, Thorofare Ridge) hikes.</p> <p>Only educational programs could use the entrance area trails.</p> <p>Overnight backpacking could be offered in the park additions and preserve. In the portion of the Kantishna Hills designated as Management Area A, camping by guided groups would be restricted to the designated campsites and all day and overnight guided hiking would be restricted to the developed trails identified under “Backcountry Facilities,” below.</p>	<p>Guided day-hiking in the Wonder Lake area and along the McKinley Bar trail would continue as described in the 1997 <i>Entrance Area and Road Corridor DCP</i>.</p> <p>Additional guided day-hiking could be continued in the western portion of the Old Park between Toklat River and Wonder Lake with access from Kantishna, limited to the same number of groups as at present.</p> <p>Guided day-hiking in the Old Park east of Toklat River would be available only on the following entrance area trails: the Rock Creek Trail and Roadside Trail between the Denali Visitor Center and Park Headquarters, the Bike Trail and Jonesville Trails between the Nenana River Bridge and the Denali Visitor Center, the Nenana River and Triple Lakes trails when planned construction or rehabilitation is complete, and the Savage Alpine Trail between Savage Campground and Savage River, only for those commercial groups staying at Savage Campground.</p> <p>Guided day-hiking and overnight backpacking could be considered throughout the park additions and preserve.</p>	<p>When current concession contracts expire, the NPS would allow for two additional guide areas. A total of three guide areas would be evenly proportioned across the entire southwest preserve. One guide area would be added in the southern portion of the northwest preserve.</p>
<p>Guided day-hiking in the Wonder Lake area and along the McKinley Bar trail would continue as described in the 1997 <i>Entrance Area and Road Corridor DCP</i>.</p> <p>Additional guided day-hiking could be continued in the western portion of the Old Park between Toklat River and Wonder Lake with access from Kantishna, limited to the same number of groups as at present.</p> <p>Guided day-hiking in the Old Park east of Toklat River would be available only on the following entrance area trails: the Rock Creek Trail and Roadside Trail between the Denali Visitor Center and Park Headquarters, the Bike Trail and Jonesville Trails between the Nenana River Bridge and the Denali Visitor Center, the Nenana River and Triple Lakes trails when planned construction or rehabilitation is complete, and the Savage Alpine Trail between Savage Campground and Savage River, only for those commercial groups staying at Savage Campground.</p> <p>Guided day-hiking and overnight backpacking could be considered throughout the park additions and preserve.</p>	<p>Effective immediately, the entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass. See Map 5.</p>	<p>When current concession contracts expire, the entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass.</p>	<p>When current concession contracts expire, the entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass.</p>	<p>When current concession contracts expire, the entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass.</p>
<p>Guided day-hiking in the Wonder Lake area and along the McKinley Bar trail would continue as described in the 1997 <i>Entrance Area and Road Corridor DCP</i>.</p> <p>Additional guided day-hiking could be continued in the western portion of the Old Park between Toklat River and Wonder Lake with access from Kantishna, limited to the same number of groups as at present.</p> <p>Guided day-hiking in the Old Park east of Toklat River would be available only on the following entrance area trails: the Rock Creek Trail and Roadside Trail between the Denali Visitor Center and Park Headquarters, the Bike Trail and Jonesville Trails between the Nenana River Bridge and the Denali Visitor Center, the Nenana River and Triple Lakes trails when planned construction or rehabilitation is complete, and the Savage Alpine Trail between Savage Campground and Savage River, only for those commercial groups staying at Savage Campground.</p> <p>Guided day-hiking and overnight backpacking could be considered throughout the park additions and preserve.</p>	<p>Effective immediately, the entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass. See Map 5.</p>	<p>When current concession contracts expire, the entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass.</p>	<p>When current concession contracts expire, the NPS would allow for two additional guide areas. A total of three guide areas would be evenly proportioned across the entire southwest preserve. One guide area would be added in the southern portion of the northwest preserve.</p>	<p>When current concession contracts expire, the NPS would allow for two additional guide areas. A total of three guide areas would be evenly proportioned across the entire southwest preserve. One guide area would be added in the southern portion of the northwest preserve.</p>
<p>Guided day-hiking in the Wonder Lake area and along the McKinley Bar trail would continue as described in the 1997 <i>Entrance Area and Road Corridor DCP</i>.</p> <p>Additional guided day-hiking could be continued in the western portion of the Old Park between Toklat River and Wonder Lake with access from Kantishna, limited to the same number of groups as at present.</p> <p>Guided day-hiking in the Old Park east of Toklat River would be available only on the following entrance area trails: the Rock Creek Trail and Roadside Trail between the Denali Visitor Center and Park Headquarters, the Bike Trail and Jonesville Trails between the Nenana River Bridge and the Denali Visitor Center, the Nenana River and Triple Lakes trails when planned construction or rehabilitation is complete, and the Savage Alpine Trail between Savage Campground and Savage River, only for those commercial groups staying at Savage Campground.</p> <p>Guided day-hiking and overnight backpacking could be considered throughout the park additions and preserve.</p>	<p>Effective immediately, the entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass. See Map 5.</p>	<p>When current concession contracts expire, the entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass.</p>	<p>When current concession contracts expire, the NPS would allow for two additional guide areas. A total of three guide areas would be evenly proportioned across the entire southwest preserve. One guide area would be added in the southern portion of the northwest preserve.</p>	<p>When current concession contracts expire, the NPS would allow for two additional guide areas. A total of three guide areas would be evenly proportioned across the entire southwest preserve. One guide area would be added in the southern portion of the northwest preserve.</p>
<p>Guided day-hiking in the Wonder Lake area and along the McKinley Bar trail would continue as described in the 1997 <i>Entrance Area and Road Corridor DCP</i>.</p> <p>Additional guided day-hiking could be continued in the western portion of the Old Park between Toklat River and Wonder Lake with access from Kantishna, limited to the same number of groups as at present.</p> <p>Guided day-hiking in the Old Park east of Toklat River would be available only on the following entrance area trails: the Rock Creek Trail and Roadside Trail between the Denali Visitor Center and Park Headquarters, the Bike Trail and Jonesville Trails between the Nenana River Bridge and the Denali Visitor Center, the Nenana River and Triple Lakes trails when planned construction or rehabilitation is complete, and the Savage Alpine Trail between Savage Campground and Savage River, only for those commercial groups staying at Savage Campground.</p> <p>Guided day-hiking and overnight backpacking could be considered throughout the park additions and preserve.</p>	<p>Effective immediately, the entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass. See Map 5.</p>	<p>When current concession contracts expire, the entire southwest Preserve would be divided into two sport-hunting guide areas with the dividing line between areas along the West Fork of the Yentna and through Shellabarger Pass.</p>	<p>When current concession contracts expire, the NPS would allow for two additional guide areas. A total of three guide areas would be evenly proportioned across the entire southwest preserve. One guide area would be added in the southern portion of the northwest preserve.</p>	<p>When current concession contracts expire, the NPS would allow for two additional guide areas. A total of three guide areas would be evenly proportioned across the entire southwest preserve. One guide area would be added in the southern portion of the northwest preserve.</p>

Guided Hiking

Guided Sport Hunting

BACKCOUNTRY FACILITIES

Topic	Alternative 1 (no-action)	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
Trails	<p>No new trails would be constructed. The NPS would generally not constructing trails in the Old Park and the northern additions.</p>	<p>No new trails would be constructed. A “no formal trails” policy would be maintained for the entire backcountry.</p>	<p>The National Park Service would designate Backcountry Hiker areas and (if needed) improve some social trails presently used by guided hiking concessions within Management Area A in Kantishna. Elsewhere in the park and preserve, the National Park Service would maintain a “no formal trails” policy.</p>	<p>The National Park Service would designate Backcountry Hiker areas and (if needed) construct or improve the following trails:</p> <ul style="list-style-type: none"> • Some existing social trails within units 41, 42, and 43 in Kantishna, formalizing a trail system in this area • From Eielson Visitor Center to Gorge Creek • A loop from the water tower above Wonder Lake Campground up to the bench west of Wonder Lake and return • From the Mount Healy overlook down a spur ridge to create a loop to the Taiga Trail • From the west end of Thorofare Bluffs down to the Thorofare River bar <p>No other new summer or winter trails would be added besides those identified in the 1997 <i>Entrance Area and Road Corridor DCP</i> and the 1997 <i>South Side Denali DCP</i>. Elsewhere in the park and preserve, the National Park Service would maintain a “no formal trails” policy.</p>	<p>The National Park Service would designate Backcountry Hiker areas and (if necessary) construct or improve the following trails:</p> <ul style="list-style-type: none"> • some existing social trails within Management Area A in Kantishna; • from Eielson Visitor Center to Gorge Creek; • from the water tower above Wonder Lake Campground to the bench west of Wonder Lake from the west end of Thorofare Bluffs down to the Thorofare River bar • from the Mount Healy overlook down a spur ridge to create a loop to the Taiga Trail; • along Wildhorse Creek connecting to trails associated with the South Denali visitor facilities development. <p>The spring multi-use trail would be upgraded to make it usable in early winter low snow conditions and it would be extended from Mile 7 to Savage Campground.</p> <p>Additional trails could be constructed within Management Area A in the lowland areas surrounding the lower Kahiltna, Tokositna, and Ruth glaciers. In other areas designated Management Area A trails could be established only if necessary to prevent resource damage. Elsewhere in the park and preserve, the NPS would maintain a “no formal trails” policy.</p>

<p>Park Road</p>	<p>During winter months, snow on one lane of the park road would continue to be packed from the Headquarters gate to Mile 7 to allow maintenance activities that prevent the buildup of ice on the road in this section while still allowing it to be used for winter recreational activities such as skiing and dog mushing. Snow would not be removed from the road until necessary to prepare the road for summer season use.</p>	<p>The park road would remain unplowed west of park Headquarters until necessary for summer season use.</p>	<p>During winter months, snow on one lane of the park road would continue to be packed from the Headquarters gate to Mile 7 to allow maintenance activities that prevent the buildup of ice on the road in this section while still allowing it to be used for winter recreational activities such as skiing and dog mushing. Snow would not be removed from the road until necessary to prepare the road for summer season use.</p>	<p>The park road would be kept open to the Savage Campground area throughout the year, and that would become the base for winter activities in that part of the Old Park.</p>
<p>Campsites</p>	<p>There would be no designated campsites.</p>	<p>There would be no designated campsites.</p>	<p>Up to five designated campsites would be created in conjunction with the Corridor areas in the Kantishna Hills.</p>	<p>Up to five designated campsites could be developed in conjunction with the Corridor areas in the Kantishna Hills, and up to three sites in conjunction with the Corridor area in the Wildhorse Creek drainage.</p>
<p>Shelters & Cabins</p>	<p>There would be no new backcountry shelters or cabins.</p>	<p>There would be no new backcountry shelters or cabins.</p>	<p>The National Park Service would add visitor facilities at park headquarters such as restrooms, plug-ins, and a warming hut to support winter use.</p>	<p>The National Park Service would add visitor facilities at park headquarters such as restrooms, plug-ins, and a warming hut to support winter use. A plowed parking area and warming hut would be provided at Savage Campground. Up to 5 public use cabins would be constructed near the southern park boundary in cooperation with Alaska State Parks.</p>
<p>Info Facilities</p>	<p>There would be no new information facilities.</p>	<p>There would be no new information facilities.</p>	<p>The National Park Service, in cooperation with other land management agencies, would operate a visitor contact station in the Cantwell/Broad Pass area.</p>	<p>The National Park Service, in cooperation with other land management agencies, would operate a visitor contact station in the Cantwell/Broad Pass area.</p>

ADMINISTRATIVE AND SCIENTIFIC ACTIVITIES

Topic	Alternative 1 (no-action)	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
Information & Education	There would be no criteria established for offering educational programs in the backcountry.	In the Old Park, hikes and educational programs led by the National Park Service, Murie Science and Learning Center, and other educational partners would be phased out over two years except on entrance area trails, where existing levels of hikes and activities could continue. All of the park additions and preserve would be available for the educational programs of the National Park Service, Murie Science and Learning Center, accredited educational institutions, and non-profit organizations operating under a cooperative agreement with the NPS.	Day-use educational programs offered by the National Park Service, Murie Science and Learning Center, accredited educational institutions, and non-profit organizations operating under a cooperative agreement with the National Park Service could be offered throughout the Old Park, park additions, and preserve. Educational programs that include an overnight stay in the backcountry could be offered in the park additions and preserve. In the portion of the Kantishna Hills designated as Management Area A, camping by educational programs would be restricted to the designated campsites.	Day use and overnight educational programs offered by the National Park Service, the Murie Science and Learning Center, and accredited educational institutions and non-profit organizations operating under a cooperative agreement with the National Park Service could be offered throughout the Old Park (including entrance area trails), park additions, and preserve. All educational programs taking place in the park and preserve backcountry would be required to meet the criteria identified under Commercial Services.	Day-use and overnight educational programs by the National Park Service, Murie Science and Learning Center, accredited educational institutions, and non-profit organizations operating under a cooperative agreement with the National Park Service could be offered throughout the Old Park, park additions, and preserve. In the portion of the Kantishna Hills designated as Management Area A, overnight camping by educational programs would be restricted to the designated campsites.
Aviation	The NPS would not complete a plan for minimizing and accounting for administrative and research use of aircraft.	The National Park Service would complete a plan for administrative and research use of aircraft in the Wilderness, park additions, and preserve that includes goals and specific objectives for minimizing helicopter and airplane use, specifies a methodology for accounting for NPS administrative and research air traffic, and provides for criteria for determining when the use of aircraft meets the “minimum requirement” test.			
Research & Resource Management	There would be no establishment of management-area-specific criteria for determining appropriate kinds of research activity.	The National Park Service would establish management criteria for research and resource management projects taking place within the Denali backcountry.		All NPS and external research would require a research permit that would be granted only if the parameters of the project meet the management area standards in the location(s) where the project is proposed. Research and resource management activities of the Alaska Department of Fish and Game would require advance consultation under the Master Memorandum of Understanding between the Department of Fish and Game and the NPS.	The National Park Service would establish management-area-specific criteria for research and resource management projects taking place within the Denali backcountry.

EASEMENTS AND BOUNDARY CHANGES

Topic	Alternative 1 (no-action)	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
Easements	The National Park Service would not seek to establish public access the existing 17(b) easement between Cantwell and the park boundary at Windy Creek.	The National Park Service would initiate collaborative action with concerned and affected parties in the Cantwell area to acquire an easement over private lands to gain public access to the existing 17(b) easement (EIN 7a C5, D1, L) that provides a route across Ahtna, Inc. land from Cantwell to the park boundary near Windy Creek. See Map 6.			
Land Exchanges	The National Park Service would not seek to adjust park boundaries.	The National Park Service would seek a land exchange similar to a previously proposed exchange of land with the State of Alaska that would realign the park boundary with the Tokositna, Coffee, and Ruth Rivers (see Map 7). As a result of the exchange approximately 2,432 acres of Denali State Park land would be transferred to Denali National Park and Preserve and approximately 3,229 acres of national park and preserve land would be transferred to Denali State Park. Land to be transferred to the state surrounds approximately 137 acres of privately owned inholdings. An additional adjustment would be proposed for the area immediately north of Dutch Creek to provide a boundary that is more identifiable in the field and out of the potential placer mining in that floodplain. Completion of the exchanges and determination of actual boundaries and acreage would depend on the outcome of negotiations with the State of Alaska.			

Table 2-15: Summary Table of Environmental Consequences

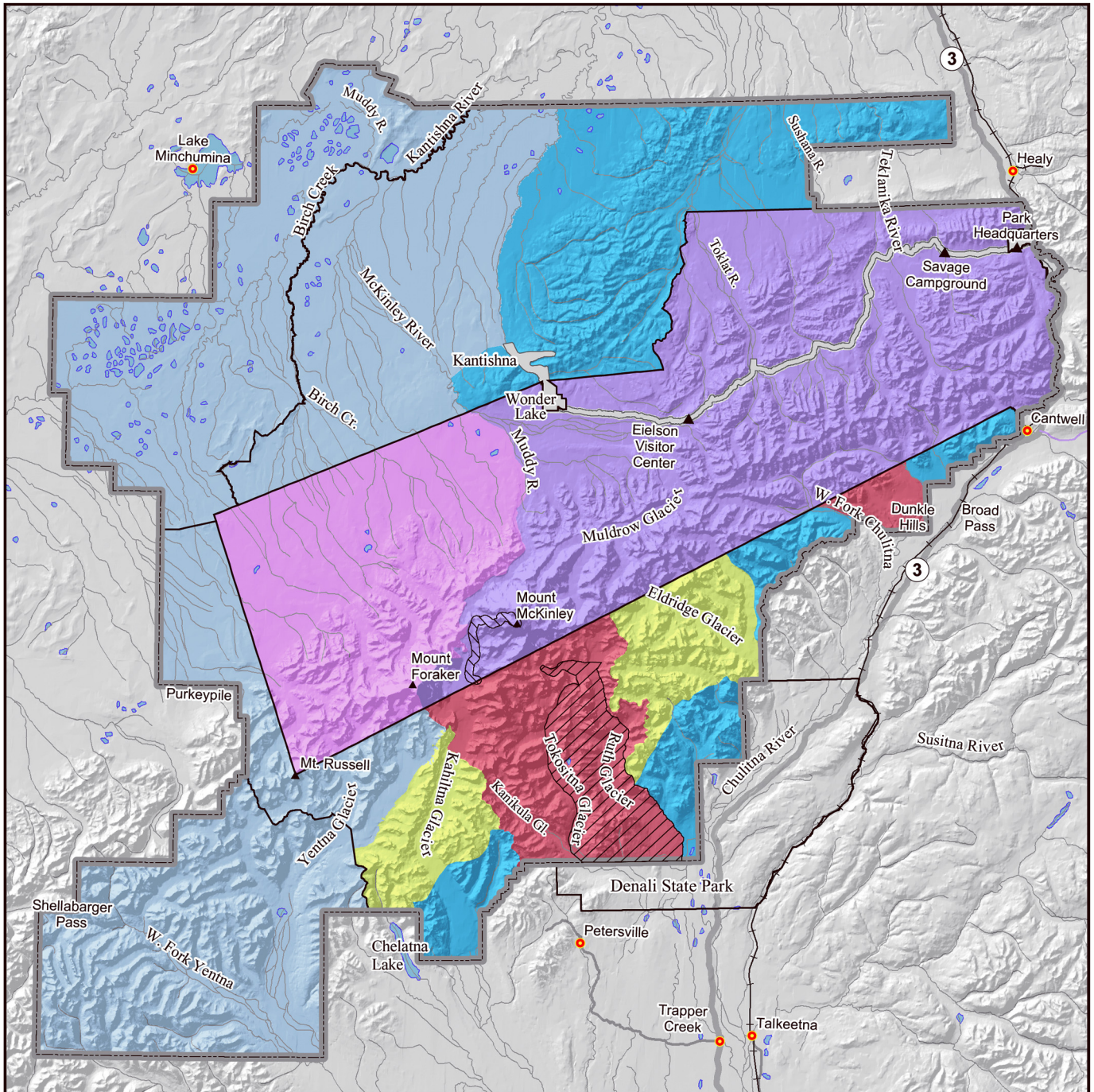
Topic	Alternative 1 No Action	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
Ice-Rich Permafrost Soils	Impacts to ice-rich permafrost soils under would be moderate because this alternative allows for substantial increases in use of snowmachines and dog sleds. Repeated passes of snowmachines and dog sleds over ice-rich permafrost soils would damage these soils. Impacts would be of medium intensity, long-term duration, and would affect an important park resource. The cumulative impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major.	Impacts to ice-rich permafrost soils would be negligible because use of snowmachines would be reduced and use of dog sleds would be managed to minimize negative impacts. There would be few repeated passes of snowmachines and dog sleds over ice-rich permafrost soils. Under this alternative, recreational and administrative activities would be reduced from current levels, and recreational users may be subject to additional conditions on use. The cumulative impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be moderate.	There would be negligible adverse impacts to ice-rich permafrost soils. Use of snowmachines and dog sleds would increase slightly above current levels, and repeated passes of snowmachines and dog sleds over ice-rich permafrost soils would damage these soils. However, use would be mitigated or restricted if standards outlined for Management Areas D, E, OP1, and OP2 are approached or exceeded. The cumulative adverse impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be moderate.	Impacts to ice-rich permafrost soils would be minor. Use of snowmachines and dog sleds would increase above current levels, and repeated passes of snowmachines and dog sleds over ice-rich permafrost soils would damage these soils. However, use would be mitigated or restricted if standards are approached or exceeded. There would be moderate adverse cumulative impacts of this alternative plus the aforementioned past, present, and reasonably foreseeable actions.	Moderate adverse impacts to ice-rich permafrost soils would occur. Use of snowmachines and dog sleds would increase above current levels, and repeated passes of snowmachines and dog sleds over ice-rich permafrost soils would damage these soils. A high-use corridor would be established in an area with abundant ice-rich permafrost soils. In other locations in the northern additions, use would be mitigated or restricted if standards outlined for Management Area B or D are approached or exceeded. The cumulative adverse impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major.
Vegetation	Major adverse impacts to vegetation would result from substantial increases in types and levels of use; without management area indicators, standards, and monitoring, the park would have no formal process to determine when impact levels become severe enough to warrant management action. More people recreating in the backcountry would create more impacts to vegetation because there would be more potential for physical trauma to sensitive plants and more potential for the introduction of exotic and invasive species. The cumulative adverse impact of this alternative plus past, present, and reasonably foreseeable actions would be major.	Impacts to vegetation would be negligible because very little vegetation would be lost, trampling would occur only in small areas, and the introduction of exotic species would be unlikely. Recreational and administrative activities would be reduced from current levels, and recreational users could be subject to additional conditions on use. Reducing use would reduce physical trauma to vegetation and would reduce the risk of exotic species spreading into and throughout the park. There would still be a moderate adverse cumulative impact to vegetation resources.	Impacts to vegetation would be minor because very little vegetation would be lost, trampling would occur only in small areas, and the potential for introduction of exotic species would exist but would not be high. Reductions in snowmachine use and management of guided hiking would have a beneficial effect on vegetation compared to the current condition. However, establishing higher use corridors and zoning the park to accommodate higher use levels in some areas would increase the potential for trampling of vegetation and introduction of exotic species. The cumulative impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be moderate.	Impacts to vegetation would be moderate because some vegetation would be lost, trampling would occur in various areas throughout roughly 6% of the park, and the potential for introduction of exotic species from airplane access and new trail construction is considerable. Increases in use would be expected to increase parkwide; however, use would be curtailed or mitigated if impacts to vegetation approach or exceed standards outlined in chapter 2. The cumulative adverse impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major.	Impacts to vegetation would be major because some vegetation would be lost, trampling would occur in various areas throughout roughly 18% percent of the park, and most importantly, the potential for introduction of exotic species from new trail construction and increased use levels is very high. Increases in both winter and summer recreational activities across the entire park and preserve would cause adverse impacts to vegetation. New trail construction would lead to loss of vegetation. The cumulative impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major.

Topic	Alternative 1 No Action	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
Wildlife	<p>Wildlife would be adversely affected in some areas of the park during summer from noise generated by aircraft operations and by human activities in the park such as hiking and camping. During winter, wildlife would be affected primarily by snowmachine use and to a much lesser extent by non-motorized activities. These impacts would not be uniformly distributed across the park but would affect wildlife in areas such as under flight corridors between Healy, Talkeetna, and Mount McKinley, at landing sites, and at access points and routes and areas heavily used by snowmachines on the south side. The overall level of adverse impact would therefore be moderate.</p>	<p>The impacts to wildlife populations and habitats would generally be negligible because of limits on numbers and types of backcountry uses. Minor adverse impacts are possible from some activities, but even then would be limited to short-term effects that would be very localized in scope.</p>	<p>There would be minor adverse impacts to wildlife populations and habitats because limits on numbers and types of backcountry uses would result in only low-intensity, non-permanent disturbances to wildlife.</p>	<p>There would be minor to moderate adverse impacts to wildlife populations and habitats because of the affects of increased snowmachine and motorboat use on various wildlife species.</p>	<p>There would generally be moderate adverse impacts to the populations and habitats of various wildlife species because of increased snowmachine and motorboat use. Although most impacts would be limited to short-term effects, there would be some persistent population-level effects in higher use areas such as Broad Pass, Dunkle Hills, Kantishna Hills, and lower elevations on the south side of the Alaska Range.</p>
Natural Soundscapes	<p>This alternative would result in major adverse impacts to the natural soundscape of Denali because of increases in high intensity, long-term motorized noise – primarily from airplanes and snowmachines – across large portions of the park and preserve. Assuming present trends continue the cumulative impact of this action combined with the impacts of previous actions could result in impairment of this important park resource that fulfills specific purposes specified by legislation.</p>	<p>This alternative would provide a major benefit to the natural sound resource at Denali by mitigating the adverse impacts caused by past actions, particularly by reducing existing snowmachine noise, the noise from scenic air tour landings other than at the Ruth Amphitheater and Kahiltna Base Camp, and the noise of scenic air tours over the Old Park and southern glaciers. However, there would still be minor cumulative adverse impacts to the natural soundscape of the park and preserve primarily because of low-intensity, long-term noise from air traffic over much of the eastern and southern park with higher concentrations around Kahiltna Base Camp and the Ruth Amphitheater.</p>	<p>This alternative would provide a moderate benefit to the natural sound resource at Denali by mitigating the adverse impacts caused by past actions, resulting in low to medium intensity, long-term reductions in noise levels over the Old Park and parts of the southern park additions. However, there would be additional temporary noise associated with construction and maintenance of trails in Kantishna along with increased backcountry monitoring. There would still be moderate adverse cumulative impacts to the natural soundscape of the park and preserve because of high intensity noise on Corridors, at Portals, and over the Ruth Glacier and medium intensity noise across much of the rest of the southern additions.</p>	<p>Alternative 4 would have negligible overall impacts on the natural sound environment of the Denali backcountry. Although the amount of motorized noise would substantially decline in the Old Park, this alternative would allow medium to high intensity, long-term increases in motorized noise in other locations. Some temporary noise would be added because of trail and campsite construction. There would still be major cumulative adverse impacts because of the high intensity airplane noise in the Ruth Amphitheater, over the southern glaciers, lowland areas between the Kahiltna and Ruth Glaciers, and in the Dunkle Hills area.</p>	<p>There would be moderate adverse impacts to the natural soundscape of the park and preserve under this alternative because of medium intensity, long-term increases in motorized noise over broad portions of the park and preserve, particularly the southern additions east of and including the Kahiltna Glacier during summer months and the Dunkle Hills/Broad Pass and Tokositna areas during late winter. There would continue to be major adverse cumulative impacts because of high intensity airplane and snowmachine access in the southern park additions and airplane overflights above the Old Park. The actions do not mitigate the increased motorized noise from previous actions, but do prevent impairment of the natural sound resource.</p>

Topic	Alternative 1 No Action	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
Wilderness	Major adverse impacts to wilderness resources of the Denali backcountry would occur because of long-term, high-intensity increases in motorized access in accessible regions. These would compromise wilderness qualities including privacy and isolation, and absence of evidence of modern human use. For some areas, such as portions of the southern glaciers between the Kahiltma and Eldridge Glaciers, the level of motorized noise and evidence of modern human use could reach a level during the summer visitor season that the area would no longer be suitable for wilderness designation. This condition would constitute impairment of a park resource that fulfills a specific purpose identified in legislation.	There would be a moderate benefit to the wilderness resource of the Denali backcountry because of long-term, substantial reductions in motorized access that translates into increased opportunity for solitude. The proposed standards for encounters with other parties, encounters with large groups, ability to camp out of sight and sound, and evidence of modern human use would protect wilderness resource values as visitation grows. A cumulative minor adverse impact to the wilderness resource of the Denali backcountry would occur, primarily because of ongoing absence of opportunities for solitude on the West Buttress route of Mount McKinley, and localized high levels of noise and motorized equipment at Kahiltma Base Camp, the Ruth Amphitheater landing area, and to a lesser degree at other Portals.	There would be a moderate benefit to the wilderness resource of the Denali backcountry, primarily because of long-term, substantial reductions in motorized access that translate into increased opportunity for solitude. The proposed standards for encounters with other parties, encounters with large groups, ability to camp out of sight and sound of others, and evidence of modern human use would protect wilderness resource values as visitation grows. There is a long-term but low-intensity loss of unconfined recreation opportunities because of new registration requirements and climbing limits on Mount McKinley. There would still be a moderate adverse cumulative impact primarily because of ongoing high levels of motorized noise and equipment associated with aircraft use during summer months and with some corridors in the southern additions during winter months.	There would be negligible new impacts to the wilderness resources of the Denali backcountry. Positive changes would occur in some locations, such as in the designated wilderness of the Old Park, but other areas that have wilderness qualities would likely lose some opportunities for solitude. The proposed standards for encounters with other parties, encounters with large groups, ability to camp out of sight and sound of others, and evidence of modern human use would protect wilderness resource values in much of the park as visitation grows. There would be minor adverse impacts from the construction of new trails and campsites and very limited restrictions on freedom of movement. However, there would still be major adverse cumulative impacts because of the ongoing absence of solitude on the West Buttress route of Mount McKinley during the primary climbing season and high levels of encounters, noise, and motorized transport in some areas.	There would be moderate adverse impacts to wilderness resources at Denali. Opportunities for solitude would remain stable in the Old Park but would decline in other locations in the southern park additions and potentially the northern park additions with increases of motorized access, support facilities such as trails, and numbers of visitors. The proposed standards for encounters with other parties, encounters with large groups, ability to camp out of sight and sound of others, and evidence of modern human use would allow higher levels of impacts than presently occur throughout the park additions and preserve. There is, however, no loss of opportunities for unconfined recreation since there would be no new registration requirements or quotas. The existing major cumulative impacts would worsen under this alternative.
Cultural Resources	There is the potential for minor to major adverse impacts on cultural resources because of unmanaged increases in the number of visitors in areas where cultural resources exist.	Impacts to cultural resources under this alternative would be negligible because actions are not proposed that would facilitate or encourage more people to visit areas where cultural resources exist.	Proposed actions could result in minor to major adverse impacts on cultural resources because of the expected increase in use in some areas where cultural sites are found, although determining specific impacts would require site-specific information.	Proposed actions could result in minor to major adverse impacts on cultural resources because of the likelihood of increased visitation to cultural resource sites in the backcountry, although determining specific impacts would require site-specific information.	Proposed actions could result in minor to major adverse impacts on cultural resources because of the likelihood of increased visitation to cultural resource sites in the backcountry, although determining specific impacts would require site-specific information.

Topic	Alternative 1 No Action	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
Subsistence	<p>There could be major adverse impacts to subsistence resources and opportunities because of the potential for high levels of widespread use of the park, particularly non-subsistence snowmachine use. Dramatic increases in park use would create unfavorable conditions for subsistence wildlife populations. These impacts on subsistence resources and opportunities in the park and preserve additions would persist beyond the life of this plan. The cumulative impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major.</p>	<p>The impacts to subsistence resources would be negligible because recreational and administrative activities would be reduced from current levels, and recreational users may be subject to additional conditions on use. The cumulative impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major.</p>	<p>There would be minor adverse impacts to subsistence resources and opportunities because of the potential for conflicts along the winter snowmachine corridors and the year-round river corridors, and the increased visitation in the Kantishna area. The cumulative impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major.</p>	<p>This alternative would have minor to moderate adverse impacts on subsistence resources and opportunities because it would result in increases in incompatible recreational activities, primarily on trails and corridors in the Cantwell, Kantishna, and Minchumina areas. These activities, including non-subsistence use of snowmachines, would create unfavorable conditions for subsistence wildlife populations and increase conflicts between recreational and subsistence users. The severity of the impact from this alternative would be mitigated by restricting high intensity uses to narrow trails and corridors. There would still be a cumulative major adverse impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions.</p>	<p>This alternative could have major impacts on subsistence resources and opportunities because of substantial increases in recreational activities – including non-subsistence snowmachine access – in both the Kantishna and Cantwell areas, which could create conflicts between recreational and subsistence users and unfavorable conditions for subsistence wildlife populations. The cumulative impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major.</p>
Socioeconomics	<p>Impacts to economic values of the park and preserve would be minor over the next several years but effects would likely increase over the next 20 years. There would be a moderate reduction in the current rural quality of life in communities near the park and preserve. Impacts to existence values would increase, while use values would tend to increase over the next several years with some reduction likely in the long term. Impacts to the value of Denali National Park and Preserve for ecosystem services would be minor initially and increase to moderate as higher levels of use occur at popular destinations. Overall impacts on social and economic values would be moderate.</p>	<p>Impacts to economic values of the park and preserve would be minor over the life of the plan. The existing rural quality of life in communities near the park and preserve could be expected to continue. Existence values would be protected and could increase eventually, as would use values for most activities. A moderate increase in the value of ecosystem services contributed by Denali National Park and Preserve could be expected throughout the life of the plan. Overall impacts on social and economic values from management actions would be minor.</p>	<p>Impacts to economic values of the park and preserve would be minor over the life of the plan. The existing rural quality of life in communities near the park and preserve could be expected to continue. Existence values would be protected and could increase eventually, as would use values for most activities. A moderate increase in the value of ecosystem services possibly contributed by Denali National Park and Preserve could be expected throughout the life of the plan. Overall impacts on social and economic values from the management actions would be minor.</p>	<p>There would be increases in economic activity. Minor impacts to the rural quality of life in communities near the park and preserve could be expected over the life span of the plan. Existence values would be protected and could increase eventually, as would use values for most activities. A moderate increase in the value of ecosystem services contributed by Denali National Park and Preserve could be expected throughout the life of the plan. Overall impacts on social and economic values from the management actions would be minor over the short term (next several years) and moderate over the life of the plan.</p>	<p>There would be increases in economic activity. Moderate impacts to the rural quality of life in communities near the park and preserve could be expected over the life of the plan. There would be a mix of minor positive and negative effects on existence values over the life of the plan, with a slight increase in the Old Park and a slight decrease in the park additions and preserve areas. Use values would tend to increase in the short term and decrease slightly over the next 20 years. A minor increase in the value of ecosystem services contributed by Denali National Park and Preserve could be expected throughout the life of the plan. Overall impacts on social and economic values from the management would be moderate over the life of the plan.</p>

Topic	Alternative 1 No Action	Alternative 2	Alternative 3	Alternative 4 - Modified (NPS preferred)	Alternative 5
Recreational Opportunity & Visitor Safety	<p>Although the amount of visitor use would increase under this alternative, the types of recreational opportunities would shrink, particularly for wilderness-dependent recreational activities sought by non-motorized users in accessible areas. This would cause major adverse impacts to recreational opportunities. There would be moderate adverse impacts to visitor safety from declining drinking water quality in some glaciated areas.</p>	<p>This alternative would have a moderate adverse impact on recreational opportunities at Denali. Although it would protect wilderness-dependent activities, it would exclude many opportunities for individuals who require assistance with access, facilities, and services over most of the park and preserve and constrain some opportunities even for those seeking wilderness-dependent activities. Those visitors seeking appropriate but not wilderness-dependent sightseeing activities would have limited options. There would be a moderate benefit to visitor safety because of education associated with new registration requirements.</p>	<p>This alternative would have a moderate beneficial impact on recreational opportunities at Denali because it would allow for a carefully managed set of appropriate backcountry activities to serve individuals who need more assistance with access, facilities, and services, while still protecting the recreational activities that are dependent upon Denali's wilderness resources and which the NPS is legislatively obligated to provide. There would be opportunity for wilderness-dependent activities to expand in accessible areas. Visitor safety would have a minor benefit from education associated with required registration for some common activities, while adverse impacts to drinking water quality would be minimized.</p>	<p>This alternative would have a minor beneficial impact on recreational opportunities at Denali because it would allow for a carefully managed set of appropriate backcountry activities to serve individuals who need more assistance with access, facilities, and services, while still protecting the recreational activities that are dependent upon Denali's wilderness resources and which the NPS is legislatively obligated to provide. However, there would be limited opportunities for some wilderness-dependent activities to expand in accessible areas. Visitor safety would be improved by education associated with required registration for some common activities, while adverse impacts to water quality would be minimized.</p>	<p>This alternative would have moderate adverse impacts on recreational opportunities because some wilderness-dependent opportunities would become difficult to find. In particular, non-motorized mountaineering and wilderness recreational activities in accessible areas of the park additions on the south side of the Alaska Range would become areas used more for visitors seeking motorized access opportunities. There would be no area of the backcountry that would preserve opportunities to encounter no other people, although some of these opportunities might incidentally remain over time. There would be minimal adverse impacts on visitor safety from declining drinking water quality.</p>
Park Management & Operations	<p>Without a comprehensive backcountry management plan, crisis management will take away from effective resource protection in other park programs. The no-action alternative would therefore result in major adverse impacts to park operations and management over the next 20 years and creates a situation where park management could not prevent impairment of park resource values.</p>	<p>Proactive management would negate the need for a reactive approach to management. Implementing actions under this alternative would cause moderate impacts to park operations and management in some areas during 5-10 years of plan implementation, but other actions reduce impacts and even provide beneficial effects that would occur throughout the life of the plan. Therefore, overall impacts to park management would still be minor.</p>	<p>Despite the fact that proactive management would negate the need for a reactive approach to management, major impacts to park operations and management would still occur in several important aspects of park operations during 5-10 years of plan implementation. The required staffing and funding are of a magnitude that would trigger the need for major secondary responses in support services such as administration, (particularly human resources), support facilities and equipment such as office space and vehicles, and facility maintenance activities. Without staffing and funding increases it would not be possible to prevent impairment of park resource values given increases in visitor use.</p>	<p>Implementing this alternative would require a substantial increase in staffing. In some cases, proactive management would negate the need for a reactive approach to management. Moderate to major impacts to park operations and management would be realized in many areas during the 5-10 years of plan implementation and throughout the life of the plan. The required staffing and funding would trigger the need for secondary responses in support services such as administration, particularly human resources, as well as facility maintenance activities. Without the staffing and funding increases described above, it would not be possible to prevent impairment of park resource values given the use increases called for by this alternative.</p>	<p>Implementing this alternative would require a substantial increase in staffing. In some cases, proactive management would negate the need for a reactive approach to management. Moderate to major impacts to park operations and management would be realized in many areas during the 5-10 years of plan implementation and throughout the life of the plan. The required staffing and funding would trigger the need for secondary responses in support services such as administration, particularly human resources, as well as facility maintenance activities. Without the staffing and funding increases described above, it would not be possible to prevent impairment of park resource values given the use increases called for by this alternative.</p>

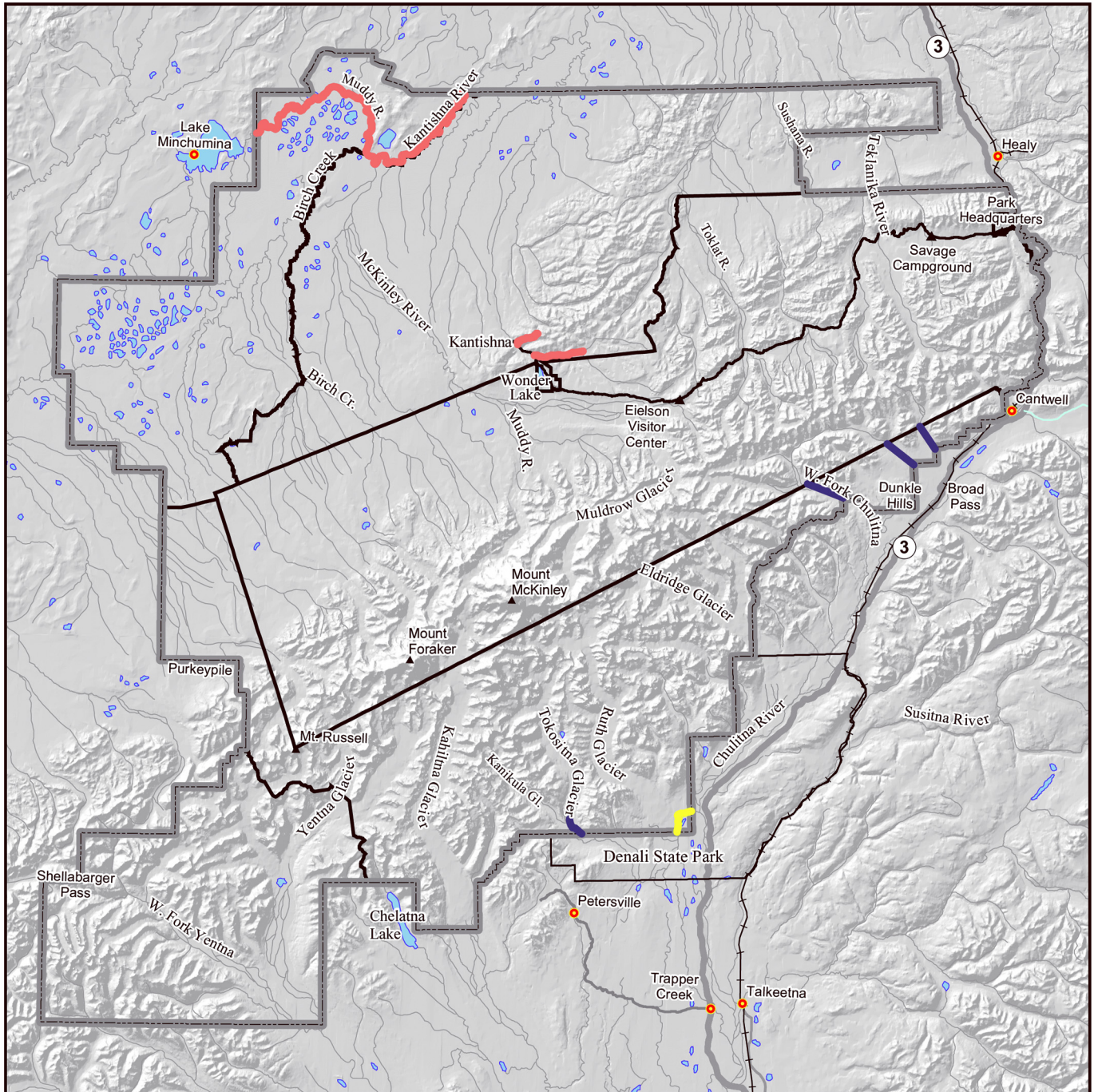


Management Areas

- A
- B
- C
- D
- OP1
- OP2
- Ruth Glacier Special Use Area
- West Buttress Special Use Area



Map 2
Alternative 4 - Modified (NPS Preferred)
Backcountry Management Plan

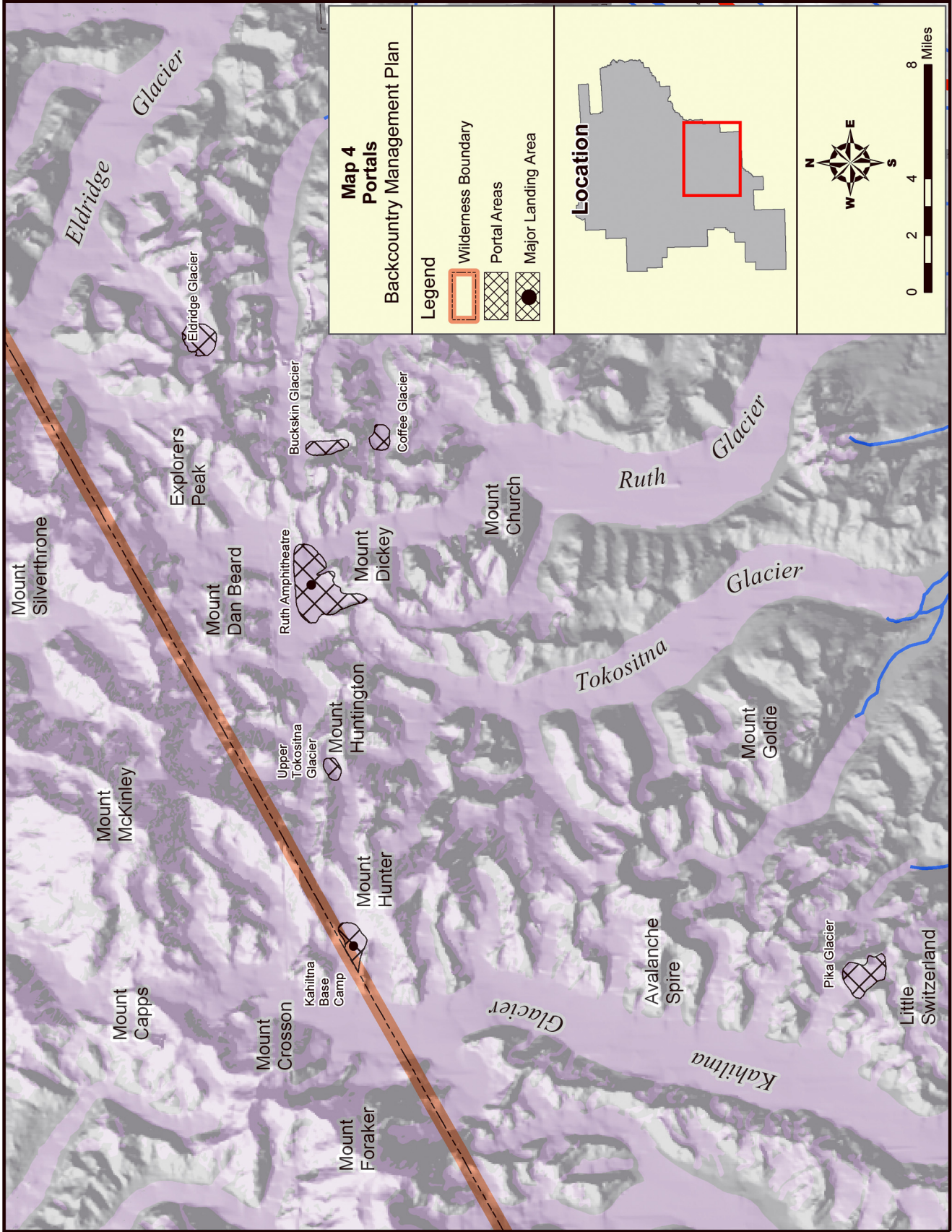


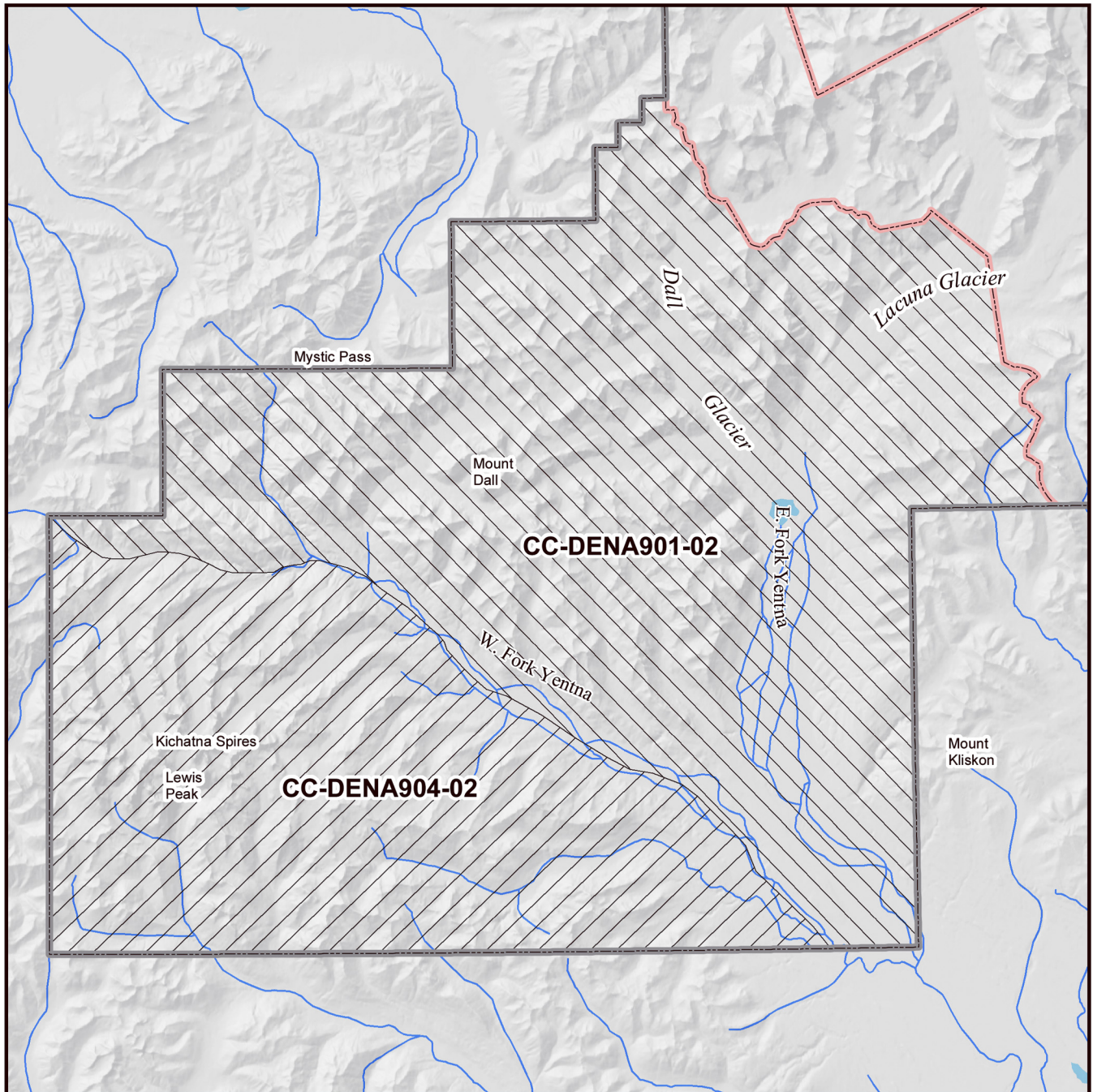
Corridors






- Summer
- Winter
- Year-Round

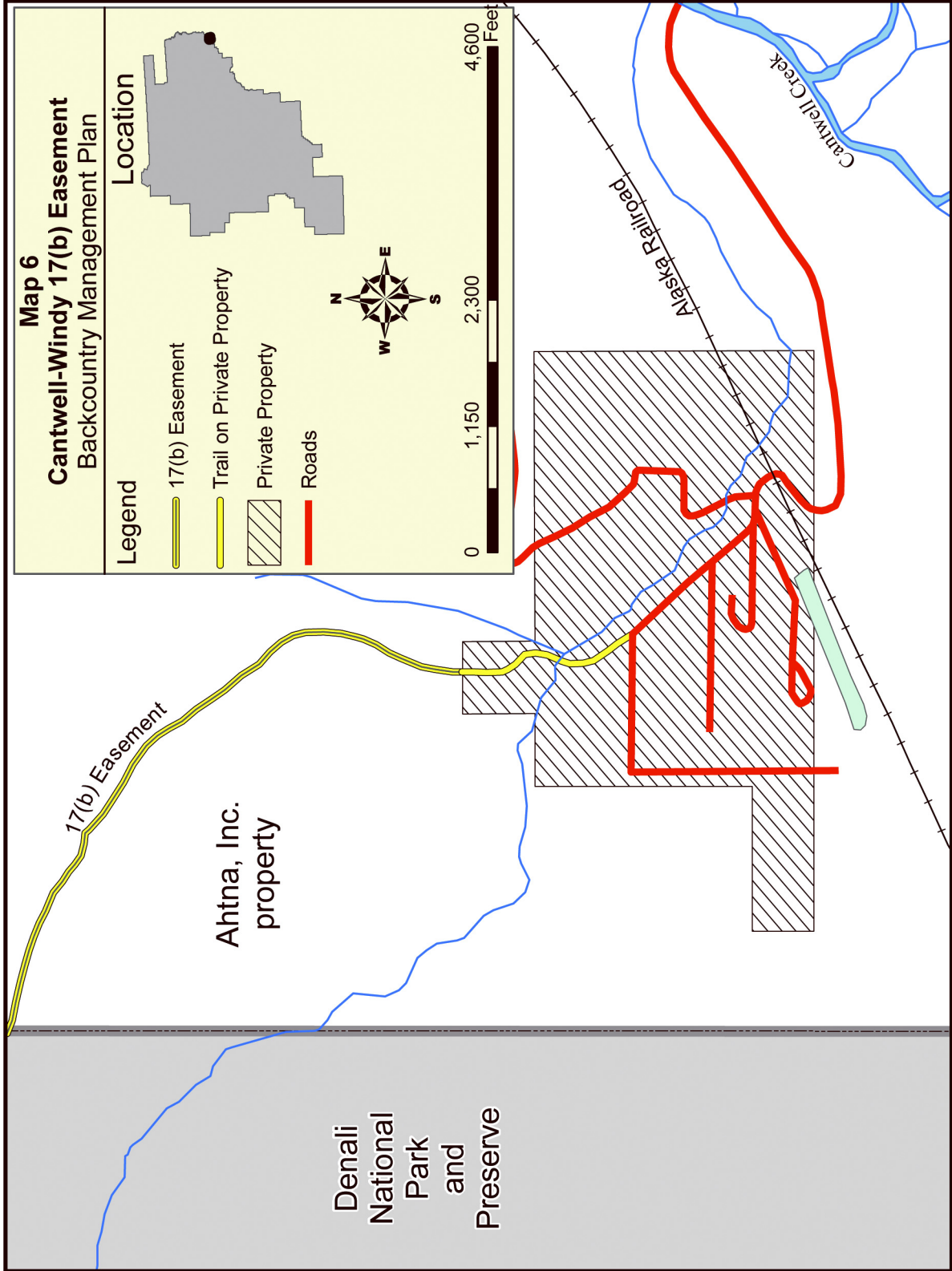


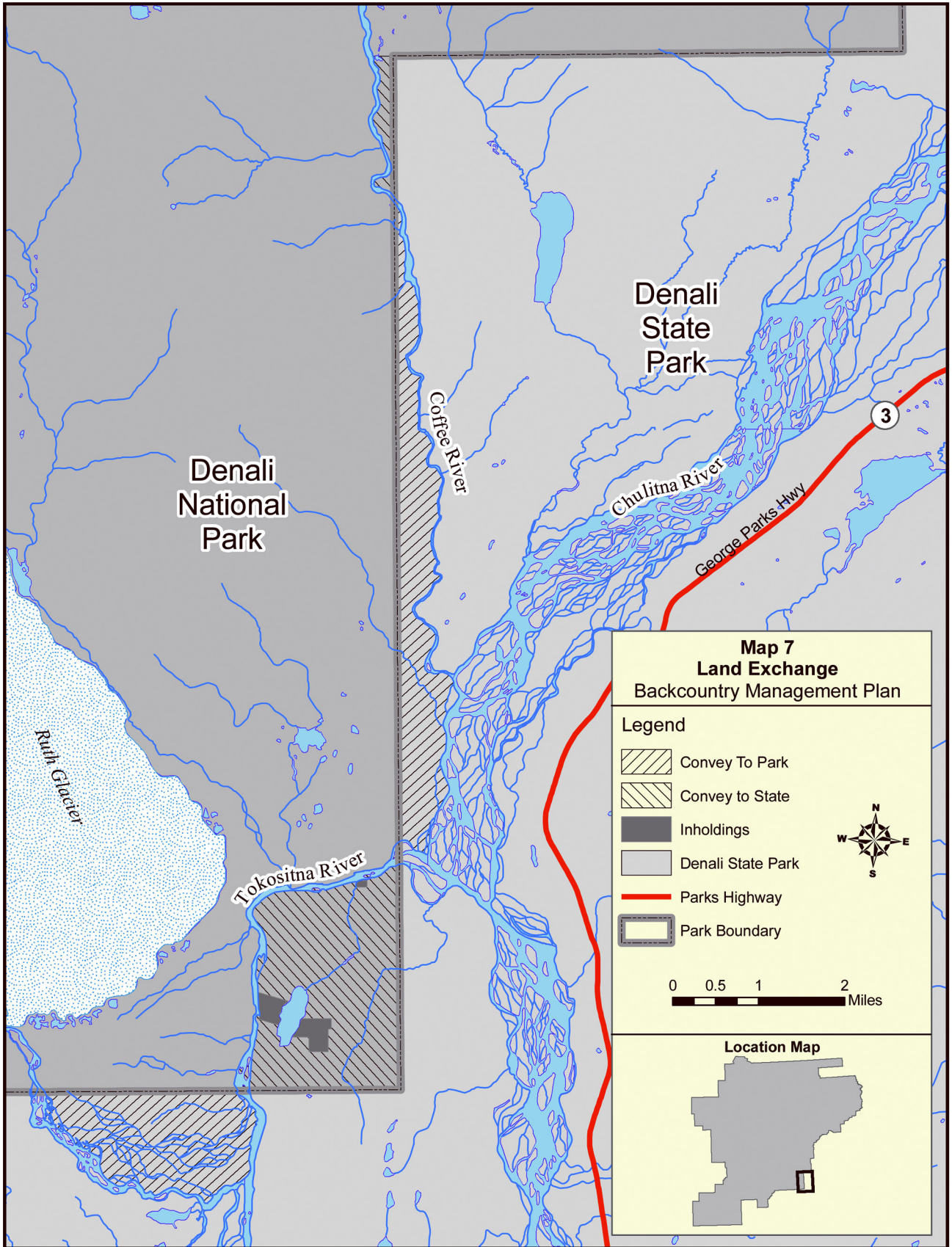
Map 3
Alternative 4 - Modified (NPS Preferred)
Backcountry Management Plan





<p>Legend</p> <p>Guide Areas</p> <p>PERMIT</p> <p> CC-DENA901-02</p> <p> CC-DENA904-02</p>	<p>Location</p> 	<p>Map 5</p> <p>Hunting Guide Areas</p> <p>Backcountry Management Plan</p>  
--	--	--







Chapter 3: Affected Environment

ERRATA

Chapter 3, Affected Environment, remains the same as it was presented in the *Revised Draft EIS* with the following minor changes. The changes are presented with insertions indicated by underlined text and deletions indicated by strikethrough.

p. 133

Natural Soundscapes

In addition to natural sounds, there are significant human-generated sounds such as aircraft and surface vehicles that are intrusions upon the natural soundscape. Because of the wilderness character of the Denali backcountry, many of the human-made sounds qualify as noise under the definition provided by Directors Order #47, which reads, “noise is generally defined as an unwanted or undesired sound, often unpleasant in quality, intensity or repetition.” Noise may often be the byproduct of desirable or legally authorized activities or machines, but it is still ~~requires~~ subject to management to protect park resources.

p. 141

Wilderness Suitability and Proposal

Section 1317(a) of ANILCA required the Secretary of Interior to conduct a wilderness suitability review for the park additions and preserve, which was included in the 1986 *General Management Plan*. The review concluded that approximately 3.73 million additional acres of the nondesignated lands in the park and preserve were suitable for wilderness designation. An area within the Kantishna Hills was determined to be unsuitable for designation as wilderness because of persistent disturbance caused by past mining activity, although since that determination all mining has ceased, many private inholdings have been acquired, and much of this land has been restored, so these lands now share similar values as the rest of the park additions. Various alternatives for additional wilderness designation were subsequently evaluated in an Environmental Impact Statement (NPS 1988) to assist in fulfilling ANILCA 1317(b), which required the President to recommend wilderness designations to Congress in accordance with the process outlined in sections 3(c) and 3(d) of the Wilderness Act. Of the 3.73 million acres of suitable lands, the preferred alternative proposed 2.25 million acres to be recommended for wilderness designation. However, the Secretary of the Interior did not forward the recommendation to the President, so the process prescribed by ANILCA 1317(b) and the Wilderness Act 3(c) and 3(d) was not completed. ~~Pending action by the Secretary of the Interior, President, and Congress, the wilderness values of the recommended lands will continue to be preserved under NPS policy.~~ (See Map 3-1).

p. 144-145
Subsistence

Subsistence community use profile studies were conducted for Cantwell, ~~and~~ Nikolai, ~~and~~ Telida in the early 1980s (Stratton and Georgette 1984; Stokes 1984), ~~and~~ Lake Minchumina in the mid-1970s (Bishop 1978). Cantwell's subsistence harvest assessment data was updated in a 2000 study, and Nikolai's harvest assessment was updated in 2003. Initial harvest assessment surveys were conducted for Telida in 2000 and Lake Minchumina in 2003.

p. 145-146
Subsistence

The National Park Service is engaged in a variety of subsistence-~~related~~ program activities beyond the ~~harvest-management~~ of fish and wildlife harvest. These include timber cutting and use, shelters and cabins, trapping and trapline management, eligibility and resident zones, access, acquisition of user data, and resolution of user conflicts and possible closures, and undertaking research on fish, wildlife, subsistence uses, and local traditional knowledge. As identified in Denali's 1986 General Management Plan subsistence section, the park has – in cooperation with the Denali Subsistence Resource Commission, Federal Regional Advisory Councils, State of Alaska, Local Advisory Committees, and the public – prepared a Subsistence Management Plan intended to address major topics related to subsistence management. Comments from other federal agencies and Native groups with park-related resource management concerns were solicited. After consultation and review, the Subsistence Management Plan was approved by the Park Superintendent and Denali Subsistence Resource Commission in 2000 (NPS 2000i).

p. 173
Climbing and Mountaineering

Besides Mount McKinley and Mount Foraker, attempted ascents on peaks within the Alaska Range and the boundaries of the park and preserve include: Mount Hunter (14,573 feet.), Mount Silverthrone (13,220 feet.), Mount Huntington (12,240 feet.), Mount Crosson (12,800 feet.), Peak 11,300', and Moose's Tooth (10,335 feet.) (NPS 2000d and f). Because registration is voluntary unless mountaineers are ascending Mount McKinley or Mount Foraker, or if their travel includes the Old Park, data are likely incomplete. However, table 3-11 ~~3-18~~ still shows a rapid increase in visitor use of Alaska Range destinations from 1997 through 2004.

p.178
Caches

Caches that support climbing and mountaineering activities are allowed in the park additions and preserve subject to the rules provided at 36 CFR 13.22. They are particularly important for expeditions attempting the northern climbing routes on Mount McKinley. The National Park Service authorizes a concessioner to deliver the

caches by dog team. Typically, freight hauling occurs during February and March, and the concessionaire remains in the park for between 7 and 44 days while shuttling freight from the Kantishna airstrip to the cache sites near McGonagall Pass. The weight of freight being transported averages about 4,000 pounds (Jones and Stokes 2000). Unattended property is generally prohibited in the Denali backcountry by 36 CFR 13.63(c).

p. 188
Off-Road Vehicles

The use of ORVs in the backcountry is prohibited throughout the national park and preserve consistent with existing regulations. The only exceptions are for specific permitted access to some inholdings in the Kantishna Hills to meet the requirement of ANILCA 1110(b) and subsistence access on constructed mining access routes in the Kantishna Hills. There is also access along the state right-of-way in the Dunkle Hills. In addition, NPS has determined that ORVs were traditionally employed for subsistence purposes in the Cantwell area under ANILCA 811(b) and is presently developing a management plan for this use.

p.197
Military Overflights

The Air Force's Susitna Military Operating Area (MOA) lies partly over the southern park and preserve. The "floor" is set at 10,000 feet above mean sea level (MSL) or 5,000 feet AGL, whichever is higher. Overflights can occur between 7 a.m. and 10 p.m. (Captain Gary L. Rolf, pers. comm.). ~~The military conducts an average of 3 flights per day (primarily by F-15s) in the Susitna MOA and an average of 8-12 flights per day (U.S. Department of Defense 1995).~~ The Final Environmental Impact Statement for Alaska Military Operations Areas (U.S. Air Force) predicted 3,600 hours per year of use in the Susitna MOA based on 15 sorties per day and 240 days per year. In a recent sample year, the military used the MOA for only 926 hours, much less than anticipated by the EIS (Colonel Jerry I. Siegel, pers. comm.)

p. 197
Backcountry Facilities

Relative to its size, Denali National Park and Preserve has very few facilities. There are ~~no~~ few maintained trails or designated campsites, ~~or~~ and no public use cabins in the backcountry. The majority of facilities in Denali National Park and Preserve are located near the park entrance and along the 92-mile park road (Map 3-2: Cities, Towns, and Boroughs), aside from a ranger station in Talkeetna. The park entrance is located at the intersection of the George Parks Highway and the park road. Many of the park facilities are designed to support the park's visitor transportation and tour bus system that operates during the peak visitor use season between May and September.



CHAPTER 4: ENVIRONMENTAL CONSEQUENCES

This chapter analyzes the probable impacts, by resource topic, for the modified preferred alternative described in chapter 2. Impact summaries from the other alternatives are found in Table 2-15 at the end of chapter 2. Complete impact analyses for other alternatives are found in the *Revised Draft EIS*. Because the modified preferred alternative is very similar to the preferred alternative in the *Revised Draft EIS*, the impacts of the proposed actions are also very similar. This chapter repeats the analysis for Alternative 4, the NPS preferred alternative from the *Revised Draft EIS*, and shows changes in that analysis for the modified preferred alternative with insertions indicated by underlined text and deletions indicated with strikethrough text.

The impact assessment evaluates the magnitude of impacts and how these impacts compare to current conditions. The cumulative impact assessment outlines overall impacts resulting from past, current, proposed, and reasonably foreseeable management actions. The impact assessment is intended to guide the decision-maker in choosing a management action that protects the environment based on an objective understanding of environmental consequences.

METHODOLOGY

Various methods were used for the impact analyses in this chapter. The principal method involved a review of published and unpublished literature regarding the effects of human activities on the resources discussed in the individual sections in this chapter. Literature sources presenting data collected from Alaska and other northern environments were given priority, and unpublished data collected in the park were reviewed and assessed for applicability. It is assumed that the results of impact studies in similar tundra and taiga environments in Alaska and Canada can be extrapolated reasonably to the Denali backcountry when specific data are lacking for Denali National Park and Preserve. In addition to literature review, the impact analyses were based on observations by park employees; discussions with residents, interest groups, and businesses at scoping meetings and in telephone conversations; site reconnaissance; and best professional judgment based on previous experience with similar projects and activities. Mitigation measures were assumed to be in place when analyzing the impacts of visitor activities and plan elements under the action alternatives.

In addition to identifying the impacts of actions proposed in the plan, this analysis examines the cumulative effect of plan actions when combined with the effects of past, present, and future actions that are outside the scope of the plan. The general methods used in the cumulative effects analysis are based on impact assessment principles outlined in the handbook produced by the Council on Environmental Quality (CEQ 1997: vii):

- address additive, countervailing, and synergistic effects;
- look beyond the life of the action;
- address the sustainability of resources, ecosystems, and human communities.

Impacts are described in as specific a manner as possible, bearing in mind the programmatic, general nature of the management plan.

NPS Management Policies affirm and clarify that the National Park Service may allow certain impacts in national park system units as long as “park resources and values” are left unimpaired. The Management Policies define park resources and values as:

- The park’s scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- Opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing any of them;
- The park’s role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- Any additional attributes encompassed by the specific values and purposes for which it was established (NPS Management Policies 2001 1.4.6).

At Denali, the National Park Service is particularly concerned with the set of these resources and values that are specifically identified in Sections 101 and 102 of ANILCA, the preservation of which is the reason for the designation of new conservation system units. In other sections, ANILCA refers to these as “resource values” and “natural and other values.” For the purposes of evaluating impacts and determining impairment for Denali, this plan equates these two ANILCA terms with the NPS Management Policy term “resources and values.”

The geographic scope of this assessment is the entire 6-million-acre area of Denali National Park and Preserve, plus adjacent lands used for subsistence, recreation, and tourism, including the associated communities along the Parks Highway, as well as those off the road system. The temporal scope extends at least 20 years into the future, the duration of the plan.

For each resource, the analysis includes a conclusion about the level of impact and about impairment. For natural and cultural resources, the conclusions are based on the following criteria. The impacts are discussed in terms of intensity, duration, and context.

Intensity

- Low: A change in a resource condition is perceptible, but it does not noticeably alter the resource's function in the park's ecosystem, cultural context, or visitor experience.
- Medium: A change in a resource condition is measurable/observable and an alteration to the resource's function in the park's ecosystem, cultural context, or visitor experience is detectable.
- High: A change in a resource condition is measurable/observable and an alteration to the resource's function in the park's ecosystem, cultural context, or visitor experience is clearly and consistently observable.

Duration

- Temporary: Impacts would last only a single visitor season or for the duration of discreet activity, such as construction of a trail (generally less than two years).
- Long term: Impacts would extend from several years up to the life of the plan.
- Permanent: Impacts are a permanent change in the resource that would last beyond the life of the plan even if the actions that caused the impacts were to cease.

Context

- Common: The affected resource is not identified in enabling legislation and is not rare either within or outside the park. The portion of the resource affected does not fill a unique role within the park or its region of the park.
- Important: The affected resource is identified by enabling legislation or is rare either within or outside the park. The portion of the resource affected does not fill a unique role within the park or its region of the park.
- Unique: The affected resource is identified by enabling legislation and the portion of the resource affected uniquely fills a role within the park or its region of the park.

Overall Conclusion

Conclusions about the overall impacts on the resource synthesize information about intensity, duration, and context, which are weighed against each other to produce a final assessment. While each conclusion reflects a judgment call about the relative importance of the various factors involved, the following descriptors provide a general guide for how those conclusions are reached.

- Negligible: Impacts are generally low intensity, temporary, and do not affect unique resources.
- Minor: Impacts tend to be low intensity or of short duration, although common resources may have more intense, longer-term impacts.

Moderate: Impacts can be of any intensity or duration, although common resources are affected by higher intensity, longer impacts while unique resources are affected by medium or low intensity, shorter-duration impacts.

Major: Impacts are generally medium or high intensity, long term, or permanent, and affect important or unique resources.

Impairment: A resource would no longer fulfill the specific purposes identified in the park's establishing legislation or its role in maintaining the natural integrity of the park.

For some topics, such as Socioeconomics, separate criteria are included in the Methodology section of the topic.

ASSUMPTIONS

Assessing the consequences of the modified preferred alternative requires making some assumptions about changes in human use patterns over time. Listed below are some of the assumptions that are referenced in the impact analysis for individual resources. Additional assumptions useful for the particular impact topic may appear in the Methodology section of the impact topic. For the impact analysis, the following time period references refer to specific "visitor seasons:"

SummerBeginning of May to the end of September
Early Winter...October and November
Mid Winter.....December through mid-February
Late WinterMid-February to the end of April

- 1) Summer visitation at Denali will resume its growth, although not at the 5% annual growth rate of the 1990s. The rate may be closer to the 2% growth seen in visitor arrivals to Alaska over the past several years (ADCED 2001). Much if not all of the growth will be among package tour travelers associated with cruise ships or other tour companies. Cruise ship arrivals in Alaska climbed 27% from 1999-2003 although this period showed a lull in visitation growth at Denali. The tourism industry clearly expects growth to return to Denali, since the number of rooms available for overnight accommodation in the Denali Borough grew 19% from 1999-2004, demonstrating continued industry interest in investment (statistic courtesy of Denali Borough).
- 2) Those package tour visitors interested in experiencing the Denali backcountry will generally rely on a guided service for access. This means that the demand for a variety of guided activities and commercial services will continue to grow, including the demand for activities and services that have not been offered at Denali in the past.

- 3) New visitor facilities will be constructed in South Denali consistent with the 1997 *South Side Denali Development Concept Plan*. As a result, some of the growth in visitation to the park backcountry will originate from the south side. Without management intervention, new south-side Denali destinations will develop on their own in locations relatively accessible by road, water, and air such as Windy Creek, Dunkle Hills, Tokositna River, the Chelatna Lake area, and glacier landing areas near Talkeetna.
- 4) Scenic air tour and air taxi services will be among the most popular of the activities sought by visitors. Although the number of passenger landings on glaciers was flat from 2001–2004, overall passenger growth from 1999–2004 was 38% and growth in landings 11% (2.1% growth in flights with landings, 6.6% annual growth in passenger volume), associated with the opening of new hotel rooms serving package tour travelers in the South Denali area (see Table 3-16).

While much of the scenic tour traffic will continue to originate from Talkeetna and the park entrance, scenic air tours from more distant locations such as Anchorage and Fairbanks will continue to increase, serving Alaska visitors who do not travel closer to Denali than these two cities. The growth in scenic air tour traffic will be mitigated somewhat by the increasing efficiency of the air tour operators, who will fill a higher percentage of seats on every flight and fly larger planes. For example, among concession flights that landed on glaciers between 1999 and 2004, the average passengers per flight increased from 3.6 to 4.5 (Table 3-16). However, even with an average 3.5% annual growth rate the amount of air traffic over the park could double by 2025.

- 5) The number of general aviation landings and overflights in the Denali area will remain small relative to the number of commercial scenic tours and air taxi traffic.
- 6) Overnight independent use of the Old Park backcountry will fluctuate within the same range as it has for the past 15 years (30,000–40,000 user nights), perhaps with some slight increase. Overnight use of accessible parts of the park additions, including mountaineering use on the glaciers and glaciated peaks, will continue to increase gradually. Day hiking will increase in areas where guided hiking opportunities are available (see Table 3-9).
- 7) Over the life of the plan, only minor growth will occur in overnight stays at accommodations in the Kantishna Hills, resulting both from minor expansions of existing businesses and from the construction of a hostel as described by the 1997 *Entrance Area and Road Corridor Development Concept Plan*.
- 8) Access to and use of public lands near or adjacent to Denali will continue to improve and grow. Limited numbers of new or improved transportation facilities will be responsible for some of the growth – such as planned improvements to the Petersville Road and the gradual expansion of the road system to serve newly developed settlement areas near the Parks Highway. However, much of the

increased access will occur because of continued technological improvements and increases in ownership of off-road vehicle transportation, including both snowmachines and wheeled or tracked all-terrain vehicles. New trail systems serving both motorized and non-motorized users may be constructed or improved on lands near the park boundary.

- 9) Winter visitation will increase. In part, this increase will occur as more Alaskans discover that Denali is open in the winter through such promotional activities as the annual Winterfest. Winter visitation also will increase along with the growth of snowmachine technology and ownership (see below). In part, the growth will occur as a larger number of out-of-state winter visitors seek winter recreational opportunities in Alaska – the number of off-season (October–April) visitors in state for reasons other than business grew from 114,000 to 142,400 between the winters of 1996–1997 and 2002–2003, an increase of 25% (ADCED 2003).
- 10) The power, speed, and range of the average snowmachine in Alaska and at Denali will continue to increase. The number of people using these snowmachines recreationally in Alaska will continue to increase. Most of the use in the Denali area will continue to be on the south side of the Alaska Range from late February through the end of April. The majority of use within park boundaries does not have characteristics that would meet the definition of “traditional activities” presently applied in the Old Park.
- 11) Adoption of low-impact technology for motorized forms of access – airplane, snowmachine, motorboat – will generally not occur without incentives or regulations.
- 12) Modes of access to the backcountry such as mountain bike, pack animal (horse, llama), or motorboat that have been only rarely used at Denali may become more popular over the lifetime of the plan.

BACKGROUND FOR ANALYSIS OF CUMULATIVE EFFECTS

Cumulative effects are defined as incremental impacts on the environment that result from adding the proposed action to other past, present, and reasonably foreseeable future actions, including those taken by both federal and nonfederal agencies, as well as actions undertaken by individuals. The next section outlines the actions considered in this analysis for the Denali Backcountry Plan. Cumulative impacts may result from singularly minor but collectively significant actions taking place over a period of time (CEQ Sec 1508.7).

This analysis evaluates the incremental contribution of impacts from the modified preferred alternative to the impacts of unrelated past and reasonably foreseeable future developments and activities in the Denali region. The analysis builds on and extends the information and analyses in the *General Management Plan EIS* (NPS 1986), the *South Side Final Development Concept Plan/EIS* (NPS 1997), the *Entrance Area and Road*

Corridor Development Concept Plan/EIS (“frontcountry” plan; NPS 1997a), the *Spruce Creek Access EA* (NPS 2002a) and the *Environmental Assessment for the Proposed Permanent Closure of the former Mount McKinley National Park to Snowmobile Use* (NPS 2000).

The period considered under cumulative effects stretches from 1972 – the first summer season when the George Parks Highway was open – to 2025, at the end of the life of the plan.

Management Areas

- The 1976 Backcountry Management Plan established backcountry units for the Old Park and quotas for overnight use in many of the units. In 1984, additional units were added to the system and quotas modified.

Access

- The 1986 General Management Plan for Denali established a cap of 10,512 round-trip vehicle trips on the Denali park road per summer season. A regulation implementing this cap went into effect in 2000.
- In 1995, the National Park Service began requiring registration 60 days in advance of the expedition start date for climbing either Mount McKinley or Mount Foraker.
- Technological improvements in snowmachines enabled a large but unquantified expansion of snowmachine use in Denali during the 1990s. Regulations implementing ANILCA section 1110(a) permit the use of snowmachines for traditional activities (where such activities are permitted by ANILCA or other law) but did not define traditional activities. Consequently, the expansion in use has been generally unmanaged. The growth in popularity of snowmachines is demonstrated by an increase in the number of registrations. Since registration in Alaska became a requirement in 2000, the number of registered machines has increased from 33,576 to 41,710, an increase of 7.5% per year. Statewide, 70% of machines are registered in the area between Anchorage and Fairbanks. (DMV 2004)
- In 2000, the National Park Service closed the former Mount McKinley National Park to snowmachine access.
- In 1995, the Department of the Air Force completed an EIS for the establishment of Military Operations Areas and Military Training Routes (MOAs and MTRs) in Alaska. This EIS included the Susitna MOA, which authorizes daily flights over a portion of the southwest Denali preserve and park additions south of the Alaska Range and east to the Tokositna area as depicted in Map 3-9 (U.S. Department of Defense 1995).

- Since 1980, new housing and commercial development has occurred in the Nenana Canyon north of the park entrance, the Yanert Valley east of the park boundary, in the eastern part of the Stampede Road corridor, around Cantwell, and along the Petersville Road. This development has resulted in minor expansion of local road networks or improvements of existing roads. The gradual development spreading out from the Parks Highway corridor is likely to continue, creating increased access to the eastern and southern boundaries of the national park, particularly the park additions.
- Concern for the safety of park visitors prompted the National Park Service to initiate a closure to the discharge of firearms in the Kantishna area in 2000. The restriction on the discharge of firearms applies on federal public lands within 1 mile of the Kantishna road right-of-way from the former Mount McKinley National Park boundary at mile 87.9 to the north end of the Kantishna airport. The firearm restriction is in effect from September 1 through September 15 each year. During the period of the firearms discharge restriction, subsistence harvests utilizing other methods and means of harvest may still take place according to federal subsistence management regulations.
- In 2005, the National Park Service determined that ORV's were traditionally employed for subsistence purposes in the Cantwell area under ANILCA 811(b) and the agency is presently developing a management plan for this use.

Commercial Services

- The National Park Service has awarded new concession contracts and allowed increased service levels for guided hiking and other activities associated with the expansion of private lodges in Kantishna. Additional activities are primarily in the Kantishna and Wonder Lake areas, but also include a road use authorization for the historic concession operator to travel into the Old Park for the purpose of interpretive hikes.
- Lodge owners or property owners in Kantishna have occasionally speculated that they might provide accommodations for winter visitors. Although there are no known plans, it remains a reasonably foreseeable action.
- During the 1990s, the number of glacier landings by air taxi operators significantly expanded, primarily in response to an increase in the number of park visitors interested in scenic tours rather than mountaineering. This rapid growth led to a conversion of the air taxi Incidental Business Permits to concession contracts in 1998 to limit the number of business enterprises able to offer this service.

- In 1998 and again in 2004, the NPS authorized three overnight guided dog-mushing concessions and one day-tour guided dog-mushing concession. Presently, only two of these concessions are active.
- In 1980, the NPS discontinued a permit for horse packing that had been issued originally in 1970. In the mid 1970s a dog-mushing concession was authorized to provide this freighting service; this service continues.
- Developing a winter tourism industry catering either to Alaskans in the major population centers of Anchorage, Fairbanks, and the Mat-Su Valley or to an out-of-state clientele is a possibility. This is a goal frequently expressed by the Healy-Denali Chamber of Commerce and some private business owners. The National Park Service and its partners have assisted in promoting winter visitation in the park entrance area by hosting an annual Winterfest that began in 2001. Further development of winter tourism could happen at many different scales and could involve both motorized and non-motorized recreation, including the potential for snowmachine rentals.

Facilities

- The National Park Service completed the *Entrance Area and Road Corridor Development Concept Plan* in 1997, which specified several new trails in the Old Park. Some of these trails have been constructed and the NPS intends to complete the remainder as funding allows.
- The National Park Service completed the *South Side Denali Development Concept Plan* in 1997, which specified new and improved road access and a visitor facility in the Peters Hills/Dutch Hills; new trails entering the park from the Peters Hills, Dunkle Hills, and Chelatna Lake area; and new campsites and six public use cabins in the Chelatna Lake and Peters Hills areas. A *South Denali Implementation Plan/Draft Environmental Impact Statement* is presently being finalized. This plan proposes a south Curry Ridge site for visitor facility development as an alternative to the Peters Hills area.
- In 2004 a “spring trail” was constructed from Park Headquarters to Mile 7 of the park road to allow for winter access from headquarters to tree line so that winter activities such as dog mushing and skiing can continue from Park Headquarters even if the road is plowed.
- Proposals have been advanced to clear an existing trail from Nenana to allow for winter access to Lake Minchumina. If the trail clearance occurs and services are provided at Minchumina, the community could become a much more popular jumping-off spot for winter trips into Denali.

Administration

- The National Park Service and its partners have greatly increased the amount of research, resource management, and monitoring activity taking place in the park since 1970. The first regular use of airplanes for research activity began in the early 1970s. In 1978, the first administrative airplane became available to the park, although it left in 1981. The summer of 1981 saw the first research use of helicopters, followed shortly afterwards by the stationing of a Firepro helicopter at Denali that has since been used for fire management and many other research and administrative projects. In the late 1980s, the park acquired two airplanes. The present aviation program expanded in 1991 with the annual contracting of a high-altitude Lama helicopter to support the mountaineering program on Mount McKinley and soon after with the increase in mountaineering patrols, which required additional contract aircraft to move rangers, volunteers, and temporary camps on and off the mountain.
- In the 1997 *Entrance Area and Road Corridor Development Concept Plan*, the National Park Service committed to establishing a center for research and education. The Murie Science and Learning Center program is now evolving, but presently includes field-based educational and research programs on trails as well as use of the backcountry. Future programs could include field research and other guided activities in the backcountry.
- The Bear-Human Conflict Management Plan of 1983 established methodologies for preventing conflicts between people and bears by prescribing appropriate methods of food storage and other behavior for people and by specifying protocols for addressing “problem” bears.

ICE-RICH PERMAFROST SOILS

The first part of this section provides an overview of the methodology used to evaluate impacts on ice-rich permafrost soils and water quality, including a literature review of the types of impacts that could result from actions proposed in the plan. The second part is an analysis of the impacts likely to occur under each alternative.

GENERAL IMPACTS BASED ON LITERATURE REVIEW

Analysis of impacts of recreational and administrative activities on ice-rich permafrost soils in Denali National Park and Preserve has relied primarily on a literature review of the types of impacts that can occur and on consultation with NPS subject matter experts and resource managers.

Ice-rich permafrost soils exist in the area between the Stampede mine, the Sushana River, and the Wyoming Hills. They also exist in the flat areas west of Kantishna and north of Purkeypile. Ice-rich permafrost soils could be affected in several ways by the actions proposed in the backcountry management plan and from the no-action alternative. Compaction of insulative surface cover, including vegetation and snow, over ice-rich permafrost soils can lead to premature warming of soils that can lead to ice degradation and thermokarsting. Melting of the ice in ice-rich permafrost soils can lead to a lowering of the ground level, creation of sag ponds and wetlands, thermokarst development, and associated changes in the vegetation regime.

Snowmachines may affect ice-rich permafrost soils indirectly by compacting snow, thereby altering snowmelt, increasing soil moisture, reducing the length of the growing season, and lowering soil temperatures beneath the trail and altering physical processes (Neumann and Merriam 1972; Pesant et al. 1985; Pesant 1987). Impacts on ice-rich permafrost soils from snowmachine use include temperature reductions in soil, which can change soil surface microstructure, which reduces the suitability of a site for seed germination and spring flower viability (Wanek and Schumacher 1975; Keddy et al. 1979). Soil compaction, because of snowmachine use, increases surface runoff, reduces infiltration, and impedes gas exchange between soil and air (Keddy et al. 1979). Compacted soils inhibit root growth and adversely affect soil organisms.

Dog-sled use may have a similar effect on ice-rich permafrost soils, by compaction of insulative layers (snow and soil), causing thermokarsting and ensuing changes in the vegetation regime. Impacts on soils from snowmachine use and dog-sled use would occur primarily in those areas that may become snow-free during certain periods in the winter or that have a thin snow cover that can be reduced further from snowmachine passes (Greller 1974). Areas of thin snow cover include mountain passes and exposed ridges. In addition, steep south-facing slopes tend to become snow-free sooner than other areas in the spring, and low snow years are common. Ice-rich permafrost soils that would normally be protected under snow may become exposed in areas with heavy snowmachine traffic.

IMPACTS OF THE MODIFIED PREFERRED ALTERNATIVE

The following analysis shows that there would be minor adverse impacts to ice-rich permafrost soils under this alternative. Impacts would be of low intensity, long-term duration, and would affect an important park resource. Use of snowmachines and dog sleds would increase above current levels, and repeated passes of snowmachines and dog sleds over ice-rich permafrost soils would damage these soils. However, use would be mitigated or restricted if standards outlined for Management Areas B, D, OP1, and OP2 are approached or exceeded.

Under this alternative, areas of the park that contain ice-rich permafrost soils would be zoned as Management Area B, D, OP1, or OP2. These management areas allow for very low to medium encounters, no landscape modifications, and low to medium trail and campsite disturbances (which include signs of social trails, campsites, or cut or broken vegetation). If standards in these categories are approached or exceeded, use would be curtailed or mitigated. Higher use levels would be accommodated along ~~147 linear miles of corridors in summer and 157 miles in winter. Since~~ 70 miles of summer Corridors and potentially 19.5 miles winter Corridors, but all of these higher use areas are ~~not~~ located where ice-rich permafrost soils are not abundant, so impacts to ice-rich permafrost soils would be minimal. ~~While the types of management areas assigned to areas of the park that contain ice-rich permafrost soils are similar to those in alternatives 2 and 3,~~ The application of these management areas allows for overall slightly higher levels of use in areas of the park that contain ice-rich permafrost soils than occurs at present. Unless otherwise stated, all impacts would occur throughout the life of the plan.

Snowmachine use would increase over current numbers. Thus, localized impacts on ice-rich permafrost soils from snowmachine use would increase where ice-rich permafrost soils are prevalent (between the Stampede mine, Sushana River, and Wyoming Hills; and also in the flat areas west of Kantishna and north of Purkeypile). Impacts would be confined to routes where riders make multiple passes .

While the adequate snow cover requirement (see Chapter 3: Affected Environment) is intended to prevent these types of effects, they could occur because of the wide variety of terrain and climatic conditions of the park additions and preserve and because the determination of adequate snow cover applies to relatively large areas.

Most mushing in the park starts from the Healy area or the park entrance area to Wonder Lake either via the park road or via the Stampede/Clearwater/Moose Creek route. Use is also common from the Stampede area up the Toklat River. Except for the park road, these mushing routes cover extensive areas of permafrost soils. Impacts to ice-rich permafrost soils from dog sleds are similar to those described for snowmachines. Mushers tend to use established trails rather than construct new ones, and multiple passes over ice-rich permafrost soils damage insulating layers of snow, vegetation, and soil. This increases potential for permafrost degradation and the associated natural resource concerns of changes in hydrology and vegetation regimes.

Levels of dog-sled use could increase above current numbers. The Kantishna and Stampede areas would be zoned as Management Area B, which allows for very little evidence of modern human use and medium levels of encounters (visitors may encounter up to two parties per day). If impacts to ice-rich permafrost soils approach or exceed standards, use would be curtailed or mitigated to reduce impacts. Levels of dog-sled use could increase slightly above current numbers but impacts would be minimal because the Kantishna and Stampede areas would be zoned as Management Areas D and OP1, which accommodate low signs of human presence, and low trail and campsite disturbance. If impacts to ice-rich permafrost soils approach or exceed standards, use would be curtailed or mitigated to reduce impacts.

Cumulative Effects

Both technological improvements and community growth have led to an expansion of snowmachine use in the Denali park additions, including the northeastern additions west of Healy where ice-rich permafrost soils are found. In addition, the potential of trail clearance to Lake Minchumina could result in increasing snowmachine use in the northwestern park additions and preserve. The NPS authorization of dog freight and guided dog mushing concessions originating from the Stampede Road and Lake Minchumina also provided additional activity in the same ice-rich permafrost areas.

These actions have resulted in a moderate adverse impact to ice-rich permafrost soils. Implementing the preferred alternative alone would have minor adverse impacts on ice-rich permafrost soils. Together with the activities previously described, there would still be only moderate adverse impacts to these physical resources, few of which are attributable to the actions under this alternative.

Conclusion

Impacts to ice-rich permafrost soils under the preferred alternative would be minor. Use of snowmachines and dog sleds would increase above current levels, and repeated passes of snowmachines and dog sleds over ice-rich permafrost soils would damage these soils. However, use would be mitigated or restricted if standards are approached or exceeded. There would be moderate adverse cumulative impacts of the final plan plus the aforementioned past, present, and reasonably foreseeable actions. The level of impacts to physical resources anticipated from this alternative would not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are essential to the natural integrity of the park.

VEGETATION

This section analyzes the probable impacts to vegetation from the potential actions identified in this plan. For this analysis, vegetation includes vascular and non-vascular flora of Denali National Park and Preserve. The first part of this section provides an overview of the methodology used to evaluate impacts on vegetation, including a literature review of the types of impacts that could result from actions proposed in the plan. The second part is an analysis of the impacts likely to occur ~~under each alternative~~.

GENERAL IMPACTS BASED ON LITERATURE REVIEW

Analysis of impacts of recreational and administrative activities on vegetation in Denali National Park and Preserve has relied primarily on a literature review of the types of impacts that can occur and on consultation with NPS subject matter experts and resource managers.

Loss of Vegetation

A variety of activities can contribute to loss of vegetation in the Denali backcountry. In severely impacted areas, the direct effects to vegetation from snowmachine use include the creation of trails where vegetation has been eliminated. Hiking and overnight camping activities can create informal trails that become established. These trails are typically devoid of vegetation and may gully and impound (in lowland areas).

Impacts to vegetation and wetlands in the Denali backcountry from facility construction can be assessed based on several decades of experience elsewhere in the park. The principal impact of visitor facilities on vegetation is the loss of vegetation because of facility construction.

Vegetation can also be lost due to human-caused fires. After examining the Yellowstone Fire Reports from 1931–2000, Warthin (2002) concluded that incidents of human-caused fire in Yellowstone National Park were higher near trails, roads, and campsites because human use is focused in these places. Fire history at Denali National Park indicates a similar trend (Dan Warthin, pers. comm.).

Trampling and Damage

The direct impacts to vegetation from snowmachine use include structural damage to plant tissues (compression, abrasion, stem breakage) (Neumann et al. 1974, Roland 2000). In ice-rich permafrost areas, trails can form impoundments, which can change plant community composition and promote erosion. Indirect impacts of snowmachine use include changes in the distribution of snow cover and in the thermal properties of the snow from compaction (Pesant et al. 1985). These changes in snow properties can prematurely expose shrubs normally covered by snow; decrease snow density, reducing the insulating value of the snow (Wanek and Schumacher 1975); and increase the

duration of snow cover on trails, thereby shortening the growing season for plants in those areas (Pesant et al. 1985).

The plant species most sensitive to these impacts are those species whose canopy extends above the snowline and/or that are common in thin snow areas. These species include willows (*Salix* spp.) and shrub birch (*Betula glandulosa*), mountain avens (*Dryas octopetala*), and blueberries (*Vaccinium* spp). Although no quantitative studies have been completed on the impacts of snowmachine use on vegetation in the Denali National Park area, visual assessments of effects have been made in the Bull River/Foggy Pass area and the Windy-Foggy-Easy Pass area (Roland 2000). Broken shrub stems, stripped bark (from abrasion), trail development, and late-melting snow were evident in high-use snowmachine areas. A Canadian study of the ecological effects of snowmachines found that, after a single pass in a stand of tree saplings, over 78% of the saplings were damaged, and woody stems up to 2.5 cm in diameter were susceptible to damage (Neumann and Merriam 1972).

Hiking and overnight camping activities can affect vegetation in several different ways. In some cases, trails can widen eventually (Lance et al. 1989), especially in moist meadows and bogs, and trail braiding will develop with increased traffic on wet or steep slopes. Shrub-dominated communities are slower to recover than grass-dominated communities (Cloe and Trull 1992). Lichens are particularly sensitive to trampling (Tietz 1996) and may not recover for several years in high-use trail areas in the alpine zone. In areas where camping is frequent, bare mineral surfaces can form from compaction and trampling (Monti and Mackintosh 1979).

Some effects of hiker and horse trampling on various types of vegetation have been described in a 5-year study conducted at Denali (Reid and Schreiner 1985). In alpine tundra areas, total plant cover was reduced by 25% with less than 40 hiker passes per season. Total plant cover in the boreal forest was reduced by 75% under that same treatment level. Cover reduction of vascular plants in the shrub tundra was intermediate between these two types, but the predominant ground cover of nonvascular lichens and mosses was more severely affected than any of the other types of vegetation examined in the study. The recover rate of the graminoid alpine tundra plants was more rapid than the woody vegetation in either the boreal forest or shrub tundra. Impacts from horse use were higher in all vegetation types and recover of trampled sites was slower.

Introduction of Exotic Species

Densmore, et al. (2001) inventoried exotic species in Denali National Park and Preserve and found that the park maintains the very fortunate position of not having a serious exotic species problem. Unlike most parks outside Alaska, Denali currently does not endure the financial burden associated with eradication efforts.

Pack animals and trails contribute to the introduction and spread of exotic species (Campbell and Gibson 2001, Hammit and Cole 1987, Benniger 1989). Examples of exotic species that could be introduced into Denali National Park and Preserve include *Hordeum* and *Chenopodium album*, or any other variety of agricultural weed that could

end up in pack animal forage. Dust effects promote the establishment of invasive plant species, such as dandelion (*Taraxacum officinale*) that compete well in areas experiencing continued disturbance. Exotic plants have been seen on floatplanes in Alaska (pers comm. Carl Roland 3/14/05). *Myriophyllum spicatum* is one example of an aquatic plant that has been introduced via airplane.

Denali National Park and Preserve's invasive species control plan consists primarily of monitoring invasive species along the park road corridor. Resource specialists react to problems as they arise. For example, volunteers pull dandelions along the road corridor, and park staff have eradicated *Crepis tectorum* from the sewage lagoon area in the park's frontcountry.

Many natural landscapes in western North America are covered in exotic plant species, and that trend is starting to occur in Alaska. Resource experts believe that Alaska is on the cusp of a situation where species are starting to creep into interior Alaska at unprecedented rates (pers comm. Carl Roland 3/15/05). As exotic plants become more widespread, the probability of exotics spreading into Denali National Park and Preserve increases. Exotics currently exist at low densities in source areas like Fairbanks, but as densities of exotics increase in source areas, the probability of exotics spreading into the park increases. There are many indications that species are becoming invasive. Resource experts are particularly concerned about white sweet clover (*melilotus spp.*), which has become established on river bars on the Nenana River and Teklanika River outside the park, and about bird vetch (*Vicia cracca*), which has invaded natural areas around Fairbanks and has appeared three times in the park (pers comm. Carl Roland 3/15/05).

IMPACTS OF THE MODIFIED PREFERRED ALTERNATIVE

The following analysis shows that impacts to vegetation under this alternative would be moderate because some vegetation would be lost, trampling would occur in various locations throughout roughly eleven percent of the park, and the potential for introduction of exotic species is considerable. This alternative would provide a variety of appropriate wilderness recreational activities and experiences by establishing areas to serve those visitors who want to experience the wilderness resource values of the Denali backcountry but require services, or assistance, or ~~short~~ who are unable to make lengthy time- commitments. The areas would be focused along the park road; ~~in~~ in the Old Park and Kantishna ~~near the park road~~; at the Ruth, Tokositna, and Kahiltna Glaciers; and in the Dunkle Hills/~~Broad Pass~~ area.

Under this alternative, ~~5549%~~ 5549% of the park (~~3,313,878.52,903,388~~ 3,313,878.52,903,388 acres) would be zoned as Management Area D or OP2. These management areas allow for low encounters, very little evidence of modern human use, no landscape modifications, and few, if any, trail and campsite disturbances (which include signs of social trails, campsites, or cut or broken vegetation). In addition, under this alternative, ~~2940%~~ 2940% of the park (~~1,738,8042,383,710~~ 1,738,8042,383,710 acres) would be zoned as Management Area OP1 or Management Area B. These management areas allow for very little evidence of modern human use, no landscape modifications, and few encounters (visitors will almost always be alone). If

standards in these categories are approached or exceeded, use would be curtailed or mitigated. Therefore, minimal adverse impacts to vegetation are likely to occur in a large portion of the park (~~8489~~% of the total park area falls within one of the aforementioned management areas).

Under this alternative, ~~116~~% of the park (~~668,314~~358,256 acres) would be designated as Management Area A, and ~~147.70~~ linear miles of summer corridors and ~~157.19.5~~ linear miles of winter corridors would be designated. The expectation in these areas would be to encounter up to five parties a day in Management Area A and up to ten parties a day along a corridor. These areas also allow for occasional trails, campsites, or cut or broken vegetation before use would be curtailed or the impacts mitigated. The remaining ~~four~~ five percent of the park would be zoned as Management Area C; this area would accommodate higher use levels, but this region of the park is largely un-vegetated.

Unless otherwise stated, all impacts would occur throughout the life of the plan.

Loss of Vegetation

The National Park Service would designate ~~hiker~~ Backcountry Hiker areas and (if needed) construct or improve the following:

- some of the existing social trails within Management Area A in Kantishna.
- the trail from Eielson Visitor Center to Gorge Creek
- the loop trail from the water tower above Wonder Lake Campground up to the bench west of Wonder Lake
- the Mount Healy trail extension
- the trail from the west end of Thorofare Bluffs down to the Thorofare River bar.
- ~~the area along Wildhorse Creek connecting to trails associated with the South Denali visitor facilities development.~~

Constructing trails in these areas would require removing vegetation.

Management area zoning would allow for increases in hiking and camping so some trampling and social trail formation would be expected around Kantishna ~~and~~ near access corridors ~~along the park road, and in the upper Tokositna drainage on the south side of the park.~~ In these areas, social trails are likely to form, resulting in lost vegetation along the trail. Also, established trails and corridors tend to create pressure for new trails, which ~~would~~ could result in additional losses to vegetation. ~~While these impacts would be noticeable in the Kantishna area and along the park road corridor,~~ The area of impact would be small on a parkwide scale.

Impacts would be mitigated by the requirement that all guided cross-country hikes would be subject to the group size limit of either 6 or 12 including guides and would be required to have a group leader who is trained in leave-no-trace principles for tundra environments generally and Denali National Park in particular. The strategy to prevent social trail formation (see chapter 2, Actions Common to All Action Alternatives) would help mitigate loss of vegetation by reducing the potential for social trail establishment.

Up to five designated ~~campsites~~ camping areas would be created in conjunction with the Corridor areas in the Kantishna Hills. Where trails and campsites are created, vegetation would be lost. Increased incidents of human-caused fire are likely to occur near trails and campsites, resulting in burned vegetation. Summer Corridor areas would receive high levels of use and social trails would form in these areas. Loss of vegetation would ~~occur~~ be very localized, primarily in the Kantishna area ~~and, along the park road corridor, and in the Wildhorse Creek drainage on the south side (impacts would occur at localized areas within about 163% of the total park area).~~

In the northern park additions, winter trails established by snowmachine or dog sled are slower to melt out than the surrounding area. Slower melt out reduces the length of the summer growing season along these trails. Over time, plants may not be able to be as viable in these areas.

Trampling

Under this alternative, access by snowmachine to the park additions and preserves would be allowed to continue and to grow. Designating corridors for winter use would focus snowmachine use ~~in the following places: from along the southern park boundary to the Old Park boundary near the West Fork Chulitna, Bull River, and Cantwell Creek to the Old Park boundary; to the toes of the Ruth, Tokositna, and Kanikula glaciers from the Tokositna River and along the Tokositna and Kanikula Rivers along the Yentna, Tokositna, and Kantishna/Muddy Rivers.~~ In a future wilderness proposal, accommodation would be made as necessary for recreational snowmachine access along 19.5 miles of winter season corridors ~~and throughout those areas designated as Management Area A (11% of the total park area and along 157 linear miles of corridors).~~ Trampling of vegetation from snowmachine use would increase as use increases. Vegetation in these high-use areas would be trampled and compacted by repeated passes of snowmachines. The peat lands along the southern boundary of the park would be especially susceptible because they are inherently susceptible to trampling and because use in these areas is expected to increase.

Heavily used routes can have long-term effects on vegetation due to crushing and elimination of vegetation, and, in the most severe cases, changes in vegetation community structure. While the adequate snow cover requirement (see Chapter 3: Affected Environment) is intended to prevent these types of impacts, they are still possible in some places because of the wide variety of terrain and climatic conditions of the park additions and preserve and because the determination of adequate snow cover applies to relatively large areas.

Registration would likely become required for overnight use east of and including the Kahiltna Glacier. The registration requirement, along with operating a public lands information center at Broad Pass, would allow park staff to better educate the visitor about low-impact techniques, thereby helping to mitigate adverse impacts to vegetation from hiking and winter uses such as snowmachine use and dog mushing. Registration would provide information that could be used to correlate visitation trends with impacts

to vegetation and help managers choose an appropriate access management tool if impacts exceed standards.

Damage to vegetation from mountain bike use would be minimal since very little off-trail riding would be expected to occur due to difficulty of riding off-trail. If standards in the trail disturbance category are approached or exceeded, use would be curtailed or mitigated.

Most mushing in the park starts from the Healy area or the park entrance area to Wonder Lake via the park road or the Stampede/Clearwater/Moose Creek route. Some mushing also occurs in the northwest preserve, in the Windy/Riley drainages, and from the Stampede area up the Toklat River. Impacts to vegetation from dog sleds would be similar to those described for snowmachines, except that the extent of the disturbance would be less because dog sleds glide over the surface more easily than heavier snowmachines and do not spin tracks. Stem breakage and abrasion are the most common impacts. Mushers tend to use established trails rather than construct new ones, so the impacts would be confined to a smaller total area. In addition, mushing typically is confined to valleys and passes, rather than high alpine areas, thus travel in windswept, snow-free areas is limited (Karen Fortier, pers. comm.). Consequently, alpine tundra is less affected by dog sleds than it would be by snowmachines.

Dog sleds would crush vegetation along the park road corridor and along the north boundary of the park, but the impact would be focused on a small area of the park. Use in areas such as Stampede and Kantishna that currently see the most use would not reach levels high enough to cause substantial impacts. Levels of dog-sled use would increase slightly above current numbers but impacts would be minimal because most of the Kantishna and Stampede areas would be zoned as Management Area B, which accommodates medium encounters, low signs of human presence, and low trail and campsite disturbance. If impacts to vegetation approach or exceed standards, use would be curtailed or mitigated.

Skiers generally use the park road and the Riley/Windy area. Levels of skier use would increase to slightly more than current numbers, but impacts would be minimal because much of the park would be zoned as Management Area B, D, OP1 or OP2, which accommodates low to medium encounters and low or medium trail and campsite disturbance. If impacts to vegetation approach or exceed standards, use would be curtailed or mitigated.

Operating a public lands information center at Broad Pass would provide an opportunity to educate winter recreationists about low-impact techniques, thereby helping to mitigate adverse impacts to vegetation from winter uses like snowmachine use and dog mushing.

Introduction of Exotic Species

Through management area zoning, this alternative would allow for increases in levels of use throughout the park additions and preserve. Increased use from pack animals, hikers, ~~and boats, and airplanes~~ would increase the potential for introduction of exotic species. ~~However, the park would have a formal process to determine when impacts from the introduction of exotic species via pack animals and other vectors become severe enough to warrant management action.~~ The most severe adverse impact to vegetation would result from the introduction of exotic plant species from airplane landings. Introduction of aquatic exotic species could become especially problematic in the northern addition where increases in motorboat use and floatplane landings could increase the spread of exotics. Exotics could also be carried in by airplanes landing on dry ridges or at non-glaciated landing areas in the Dunkle, Yentna, Tokositna, Stampede, and Kantishna areas.

Trail construction would also contribute to the potential for introduction of exotics because materials used in trail construction could contain exotic species. The National Park Service would designate ~~hiker~~ Backcountry Hiker areas and (if needed) construct or improve the following:

- some of the existing social trails within Management Area A in Kantishna.
- the trail from Eielson Visitor Center to Gorge Creek
- the area from the water tower above Wonder Lake Campground up to the bench west of Wonder Lake
- the Mount Healy trail extension
- the trail from the west end of Thorofare Bluffs down to the Thorofare River bar.
- ~~the area along Wildhorse Creek connecting to trails associated with the South Denali visitor facilities development.~~

Trails provide easier access so they typically attract greater numbers of people than off-trail areas. More trails equate to higher use and higher use creates a greater potential for the introduction of exotics. Trails are especially susceptible to colonization of exotics because exotics can more easily colonize disturbed areas that are free of vegetation. Trails that originate along the road corridor (at Eielson, Wonder Lake, and Kantishna) would connect a disturbed area (the park road corridor) to an undisturbed area, facilitating the spread of exotics into the backcountry. The introduction of exotic plant species could displace native vegetation, alter the composition of plant communities, and disrupt ecological functions.

~~Impacts from exotic species in a management scenario that uses a formal process, such as management area zoning and the use of indicators and standards that is proposed under, would be less than in a situation where no formal process exists and managers react to impacts on a case by case basis. A formal process to guide management decisions would allow managers to focus monitoring and mitigation efforts. Still, under this alternative, it could be difficult to monitor all areas that would be most susceptible to the spread of exotic species because there are many areas and some are very remote.~~

Cumulative Effects

The expansion of communities and local road networks near the park's eastern and southern boundaries combined with technology improvements have enhanced access by snowmachine and dog sled in winter, raising use levels and the associated potential for trampling vegetation. This trend is likely to continue in the future and will be supplemented by access improvements and increased visitation associated with South Side Denali plan implementation, and ~~possibly~~ some level of legal ORV use associated with subsistence use, all of which could increase the potential for introducing exotic species as well as increased trampling both summer and winter. Trail construction within the Old Park and additional planned trail construction associated with both the 1997 *South Side Denali* and the 1997 *Entrance Area and Road Corridor* plans has resulted (and will result) in the direct removal of vegetation. Timber harvest for subsistence also removes vegetation.

These actions will result in moderate adverse impacts to the vegetation resources of the park. Implementing this alternative would have moderate adverse impacts on vegetation. The cumulative adverse impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major.

Conclusion

Under this alternative, impacts to vegetation would be moderate because some vegetation would be lost, trampling would occur in various areas throughout roughly ~~11~~6% of the park, and the potential for introduction of exotic species from new trail construction and airplane access is considerable. Increases in use would be expected ~~to increase~~ parkwide; however, use would be curtailed or mitigated if impacts to vegetation approach or exceed standards outlined in chapter 2. The cumulative adverse impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major. The level of impacts to vegetation anticipated from this alternative would not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are essential to the natural integrity of the park.

WILDLIFE

The wildlife section presents a literature review of the types of impacts on wildlife that can result from the various visitor activities that could occur in the park and preserve, outlines the impacts thresholds used to determine the magnitude of effects on wildlife, and provides an analysis of the impacts likely to occur under ~~each~~ the modified preferred alternative.

GENERAL IMPACTS ON WILDLIFE

Analysis of impacts of recreational activities on wildlife in Denali National Park and Preserve has relied primarily on:

- studies and reports compiled for an environmental assessment of closure of the Old Park in Denali National Park and Preserve to snowmachine use
- a review of the effects of winter recreation on wildlife in Yellowstone National Park (Oliff et al. 1999)
- studies and reports cited in the draft environmental impact statement for the winter use plan for Yellowstone and Grand Teton National Parks
- studies and reports cited in *Effects of Recreation on Rocky Mountain Wildlife: A Review for Montana* (Joslin and Youmans, 1999)
- a book on wildlife and recreational use (Knight and Gutzwiller 1995)

In combination, these references provide an excellent summary of the available literature on effects of recreational activities on wildlife. The environmental consequences to wildlife of recreational activities outlined in the Denali Backcountry Management Plan would vary for different species and activities.

Specific research on the effects of backcountry recreational activities on wildlife in Denali National Park and Preserve includes a wolf study by Chapman (1977) and several analyses of the effects of visitor use along the road corridor. Research on the effects of the park road and vehicular traffic with its associated human activities includes several studies over the past 25 years: Tracy 1977, Dean and Tracy 1979, Singer and Beattie 1986, Dalle-Molle and Van Horn 1991, Taylor et al. 1997, and Burson et al. 2000.

Snowmachine Use and other Winter Activities

Several studies have been conducted that show the direct impact of repeated snowmachine use on wildlife behavior and levels of physiological stress (Aune 1981; Dorrance et al., 1975; Freddy et al., 1986; Moen et al., 1982; Neumann and Merriam, 1972; Rudd and Irwin, 1985; Simpson 1987; Tyler 1991; Voyageurs National Park 1996). These studies indicate that exposure of wildlife to snowmachine use can result in behavioral alteration, habitat avoidance, and increased energy expenditures. These changes could occur at critical times when animals are under extreme stress, especially during winter, when energy conservation is crucial. As winter progresses, animals can experience an energy deficit, as more energy is used to survive than is replenished. The

survival of individual animals depends on the severity of energy expenditures as well as the animal's energy stores.

Ungulates: Caribou, Dall Sheep, Moose

Creel et al. (2002) completed a study of the effects of snowmachine activity on elk and wolves, focusing on the occurrence of stress-related hormones (glucocorticoids [GCs]) in fecal samples in areas with differing levels of snowmachine use in Yellowstone, Voyageurs, and Isle Royale national parks. Chronically elevated GC levels have been associated with a variety of problems including reduced reproduction, ulcers, muscle wasting, and immune suppression. This study found significantly higher levels of GCs in elk in Yellowstone during the snowmachine season and when daily numbers of snowmachines increased. In summary, Creel et al. (2002: 812) reports that the data "...show that stress-hormone levels correlate with snowmobile usage on both short (daily) and long (annual) time scales." Although these increased GC levels indicate a clear physiological stress response to snowmachines, no perceptible impacts on population size have been recorded in these parks, which the authors suggest indicates that the elk and wolf populations are able to compensate for the current levels of snowmachine activity.

Observations by Alaska Department of Fish and Game biologists in the Talkeetna Mountains near Denali National Park and Preserve indicate that increasing recreational snowmachine use is beginning to alter moose use of preferred tree line willow habitats (Herman Griese, pers. comm.). Dog-sled use and snowshoeing can also increase negative interactions of human visitors with moose encountered on the trails.

Several sources cite the loss of habitat and the use of traditional migration routes as concerns associated with bighorn sheep (Constan 1975; Horejsi 1976; Reisenhoover et al. 1988; EPFW 1993). Various recreational activities are known to cause displacement from preferred habitats (Horejsi 1976; Hicks and Elder 1979) and fleeing when approached by people (MacArthur et al. 1982). Similar reactions by Dall sheep could be expected when confronted with other forms of human activity, such as the presence of snowmachines, snowshoers, skiers, and dog teams.

Compacted trails also change distribution patterns of animals by providing energy efficient travel ways that alter winter survival rates, predation rates, distribution patterns, availability of carrion for use by other species, and levels of human conflict (Meager et al. 1994). Compaction of snow in forage areas can also have other negative effects on wildlife foraging. It increases energy expenditures by ungulates, such as caribou, that must dig for vegetation in extremely stressful winter months (Fancy and White 1995).

Research at Denali also indicates that snow depth and winter travel conditions are important factors in winter survival for ungulates and the predators that depend on them (Adams and Dale 1998). Traveling through snow compacted by a snowmachine can cost caribou 2–4 times as much energy as traveling through uncrusted snow (Fancy and White 1985).

In certain situations, a snowmachine can be less disturbing than a cross-country skier. As referenced by Joslin and Youmans (1999), Parker et al. (1984:484) observed, “Flight distances decline from early to late winter as the animals become habituated and as body energy reserves are depleted. Greater flight distances occur in response to skiers or individuals on foot than to snowmachines, suggesting that the most detrimental disturbance to the wintering animal is that which is unanticipated.” Observations in locations other than well-used trails, where all types of use were equally unfamiliar to animals or not restricted to trails, such as the Denali situation, demonstrate equal or greater responses to snowmachines (Aune 1981). More importantly, the speed and range of snowmachines mean that they have the potential to disturb wildlife over a much larger geographic range than non-motorized travel.

The lack of an overt behavioral response does not necessarily indicate an absence of disturbance. According to Chabot (1991), elk heart rate data showed an increase in heart rates even when their behavior did not demonstrate a response.

Large Carnivores: Black Bear, Brown/Grizzly Bear, Wolf

Research indicates that additional stress from disturbance by increased human activity could have a detrimental effect on bears during critical times (Goodrich and Berger 1994; Watts and Jonkel 1989). Goodrich and Berger (1994) showed that some bears abandoned dens and cubs in response to disturbance.

A four-year study at Voyageurs National Park, Minnesota, found that snowmachines were adversely affecting wolves through displacement and disturbance (Voyageurs National Park 1996). Creel et al. (2002) completed a study of the effects of snowmachine activity on elk and wolves, focusing on the occurrence of stress-related hormones (glucocorticoids [GCs]) in fecal samples in areas with differing levels of snowmachine use in Yellowstone, Voyageurs, and Isle Royale national parks. Chronically elevated GC levels have been associated with a variety of problems including reduced reproduction, ulcers, muscle wasting, and immune suppression. In Voyageurs National Park, a 37% decrease in snowmachine use was accompanied by a 37% decrease in GC levels in wolves, indicating a strong relationship between these parameters. In summary, Creel et al. (2002: 812) reports that the data “...show that stress-hormone levels correlate with snowmobile usage on both short (daily) and long (annual) time scales.” Although these increased GC levels indicate a clear physiological stress response to snowmachines, no perceptible impacts on population size have been recorded in these parks, which the authors suggest indicates that the elk and wolf populations are able to compensate for the current levels of snowmachine activity.

Compacted trails also change distribution patterns of animals by providing energy efficient travel ways that alter winter survival rates, predation rates, distribution patterns, availability of carrion for use by other species, and levels of human conflict (Meager et al. 1994). Some activities, such as dog-sledding and snowshoeing, may change movement patterns of some wildlife species such as wolves that use the packed trails.

Joslin and Youmans (1996) referenced several studies to summarize how wolves use snowmachine trails:

Wolves often take advantage of easy travel on compacted snowmobile trails. Traveling on human-compact routes has both positive and negative impacts on wolves. Human activities that compact snow (e.g., snowmobiling, cross-country skiing, road-plowing) provide easy travel routes for wolves into areas that would otherwise be difficult to reach in deep snow (Paquet et al. 1996). Wolves have a lighter foot loading than most ungulates (Telfer and Kelsall 1984) and often travel on snow that will not support their prey (Peterson 1977, Paquet 1989). Wolves have difficulty moving in snow deeper than 50 cm (Pulliainen 1965) and normally avoid areas of consistently deep snow. The ease of travel along travel routes compacted by humans may increase the effects of predation on ungulates (O'Karma et al. 1995) as previously unexploited ungulate ranges are discovered by wolves.

Domestic dogs in backcountry areas can negatively affect wildlife by disturbance and disease transmission (Mech and Goyal, 1993; Sime 1999).

Small and Mid-sized Carnivores: Lynx, Coyote, Fox, Mustelids

Hornocker and Hash (1981) suggested that human access via snowmachine or all-terrain vehicles in winter or early spring could disturb wolverines, and in the Lolo National Forest, Montana, denning wolverines appear sensitive to the slightest human disturbance in the denning area (USDA Forest Service 1998). Copeland (1996) believes that technological advances in over-snow vehicles and increased interest in winter recreation has likely displaced wolverines from potential denning habitat and will continue to threaten a possibly limited resource. This could result in lower reproductive success and/or kit survival. In the Lolo National Forest, female wolverines in the area are presumed to have abandoned any potential denning areas that experience snowmachine use (USDA Forest Service 1998). Copeland (1996) also found that snowshoers caused den abandonment in a cirque basin.

Characteristics of snowmachine use, including dispersal over the landscape, operation at night when lynx are active, alteration of the mobility and distribution of snowshoe hares, and winter operations all point to this form of recreation as being potentially adverse to lynx (Olliff et al. 1999). Snowmachine use has affected red fox mobility (Schmid 1983). Dog-sledding and snowshoeing may change movement patterns of coyotes, and foxes that use the packed trails.

Lynx are specialized deep-snow predators, an adaptation that permits them to live year-round at high elevations, thereby minimizing competition during the physically stressful winter months. Snowmachine or cross-country ski trails allow lynx competitors to infiltrate high-elevation habitats during winter, thereby increasing competition for a limited food supply (Idaho Department of Fish and Game et al. 1995).

Compacted trails also change distribution patterns of animals by providing energy efficient travel ways that alter winter survival rates, predation rates, distribution patterns,

availability of carrion for use by other species, and levels of human conflict (Meagher et al. 1994).

Rodents, Lagomorphs, and Insectivores

Snowmachine use has affected snowshoe hare mobility (Schmid 1983). Neumann and Merriam (1972) found snowshoe hares reducing their use of habitat near snowmachine trails.

Small mammals inhabiting the subnivean environment are adversely affected by snowmachine use. Jarvinen and Schmid (1971) noted increased small mammal mortality beneath compacted snow. Some of the possible changes in snow conditions resulting from snow compaction include a decrease in subnivean air space, a change in temperature, and accumulation of toxic air under the snow (Jarvinen and Schmid 1971, Schmid 1971a and b). Multiple passes over the same track will have more impact than a single pass, and the larger the area of compaction, the greater the possible affect to subnivean fauna (Halfpenny and Ozanne 1989).

Fish and Aquatic Life

Snowmachine use could affect fish and other aquatic species through increased use, including at stream crossings, and the possibility of contaminants [fuel spills and unburned fuel deposited by two-stroke engines (EPA, 2001)]. Pollutants from snowmachine emissions, including highly persistent polycyclic aromatic hydrocarbons, can remain within the snow pack until they are released during snowmelt, causing elevated acidity levels in surrounding waterways, which could result in adverse effects on fish (Adams 1975) or higher death rates for aquatic insects. The severity of these occurrences would depend on the level of use near waterways.

Non-motorized forms of winter recreation, such as dog sledding, skijoring, cross-country skiing, and snowshoeing, would cause minimal levels of noise and physical disturbance to aquatic habitats under adequate snow and ice cover.

Hiking, Backpacking and Camping

Knight and Cole (1995b) reviewed literature on the effects to wildlife by humans on foot and found that most responses of wildlife are behavioral and of short duration.

Ungulates: Caribou, Dall Sheep, Moose

Studies of the effects of hikers on large mammals have included several studies on species of horned sheep (Dall sheep and relatives). MacArthur et al. (1982), in a study of the differences in response of mountain sheep in Alberta, found little reaction of sheep to hikers approaching from parked vehicles, but responses increased markedly when sheep were approached from above (from out of view). Papouchis et al. (2001) found that hikers in Canyonlands National Park elicited more severe responses from bighorn sheep (animals fled in 61% of encounters) than did either vehicles (17%) or mountain bikers (6%), and they speculated that part of the reason for the difference in response was that approaches by hikers were more unpredictable.

Large Carnivores: Black Bear, Brown/Grizzly Bear, Wolf

Grizzly bears are sensitive to human disturbance. However, they will readily habituate to ongoing and predictable human activity. Habituation can be both negative and positive. Habituation can be positive in that human activity will not displace bears from preferred foraging areas or disrupt crucial life processes. Habituation can be negative in areas where human activity is not closely regulated because habituation is usually accompanied by food conditioning. Habituated and food-conditioned bears are dangerous because they have come to associate humans with food (Joslin and Youmans 1999).

In several parks and other protected areas, backcountry units have been closed to hiking and other recreation to protect wolf dens and wolf pups from human disturbance and habituation (Chapman 1977, Fritts, et al. 2003, NPS 2002e, NPS 2003).

Birds

Some recent research has focused on the effects of hiking and recreational trails on bird populations, where effects of disturbance may be subtler, such as changes in diversity, nesting success, or distribution. In Colorado, recreational trails adversely affected both the numbers and breeding success of some bird species using habitats adjacent to trails, although it was not clear whether those effects were due primarily to the edge effect of the trail or to human disturbance (Miller et al. 1998). Visitor levels in Colorado were significantly higher (more than 1 million visits per year) than would be expected in Denali National Park and Preserve. In contrast, Miller and Hobbs (2000) found that nest predation was less near trails along a riparian area in Colorado (use averaged 16–22 people/hectare) but increased in adjacent habitats, apparently because of mammalian predators being displaced from areas near the trail. These studies suggest that the habitats likely to receive the greatest disturbance are those where hikers are concentrated, such as at trailheads, or where larger party sizes return frequently, such as with guided tours.

Steidl et al. (1993) found that human disturbance (such as camping at 400 m from nests) negatively affected nesting behaviors of golden eagles. Adults spent less time near their nests, fed their young less frequently, and fed themselves and their young up to 67% less food when observers were camped 400 m from nests than when observers were camped 800 m from nests. The potential impacts from the reduction in food alone could have substantial long-term effects on the golden eagle population (Steidl et al. 1993).

Aircraft

The primary disturbance to wildlife from aircraft (fixed-wing and helicopter) operations is noise. Noise generated by airplanes can be separated into two general components: (1) noise associated with take-offs, landings, and taxiing, where maximum noise levels are generated relatively close to the ground and on the airstrip, and (2) noise generated by airplanes flying over the park.

Ungulates: Caribou, Dall Sheep, Moose

Research on the effects of low-altitude military aircraft on caribou concluded that behavioral impacts generally were mild, but that female caribou reacted to the noise of jet aircraft overflights by lying less and moving more, and that these responses were most

prevalent in June when newborn calves were present (Murphy et al. 1993). Other research on northern mammals has focused on low-flying helicopters and the effects of low-level aerial surveys (Klein 1973, McCourt and Horstman 1974, Calef et al. 1976). These studies provide a framework for how different species are affected by aircraft noise and aircraft activity in general.

Although rare, collisions of aircraft with wildlife are possible either while landing or taking-off at airstrips and while in flight (Cleary et al. 2002). Some animals may be attracted to airstrips by forage availability (willows for moose) or insect-relief habitat (caribou) that places them in locations where aircraft strikes are possible during landings or take-offs.

Watercraft

Motorized boating on rivers can have localized impacts on some wildlife species. Knight and Cole (1995b) found that motorized boating tended to be more disturbing to wildlife than non-motorized boating because it presented not only a visual stimulus (movement), but caused noise as well, which increased disturbance to wildlife.

Birds

Motorized and non-motorized boating on lakes, ponds, and rivers can disturb nesting waterfowl and shorebirds that use those wetlands. Reactions of waterfowl to boating activities can range from swimming away from the disturbance to flying (Hockin et al. 1992, Madsen 1998). Bald eagles were sensitive to boating activities along narrow river corridors and to noisy boats, but responses varied seasonally (Anthony et al. 1995). Motorboat traffic can have negative impacts on loon nests and nesting success (Vermeer 1973).

Fish and Aquatic Life

Motorboat use may cause degradation of fish and wildlife habitats in heavily used areas by destroying vegetation, introducing invasive species, degrading soils, or adversely affecting water quality.

Sport Hunting and Fishing

Sport hunting and fishing (including guided hunting and fishing) result in mortalities (and occasionally injuries) for target animal and fish species. In addition, non-target wildlife may experience short-term behavioral disturbance or displacement from noise and human activity associated with guided hunts.

IMPACTS OF THE MODIFIED PREFERRED ALTERNATIVE

There would generally be minor to moderate adverse impacts to wildlife populations and habitats under this alternative, primarily because of the impacts of increased

snowmachine and motorboat use ~~on various wildlife species~~ and to a lesser extent from non-motorized recreational activities.

General Impacts: Wildlife

Under this alternative, snowmachine use would continue to increase and expand into more locations in the park additions and preserve. Use would expand in area (as 64% of the total park area would be open to snowmachine use) and in density. In addition to dispersed use, winter corridors ~~would~~ could be established ~~from the southern park boundary to the Old Park boundary near~~ along the West Fork Chulitna, Bull River, and Cantwell Creek up to the Old Park boundary and . ~~If demand is sufficient, this alternative also allows for the establishment of winter corridors to the toes of the Ruth, Tokositna, and Kanikula glaciers from the Tokositna River~~ up the Tokositna to the mouth of Wildhorse Creek. Winter corridors would result in areas of more concentrated snowmachine use and areas designated as Management Area A (~~11~~ 16% of the park and preserve) would allow for an encounter rate of up to five parties per day, including two parties of up to six people. Areas designated Management Area B (~~5~~ 16%) would allow an encounter rate of up to two parties per day, including parties of up to six people.

Several different impacts to wildlife populations and habitats could be expected from the increased numbers and density of snowmachine use. Encounters with wildlife in the backcountry would cause behavioral disturbance, increase stress levels, and temporarily displace wildlife from areas where snowmachines are regularly used. In some cases, wildlife mortality or injury to species would occur from wildlife-snowmachine collisions. Snowmachine trails would enhance or modify movements of wildlife by providing packed trails that make movements easier and that allow access to new areas. There would be short-term changes in wildlife populations and habitats at several distinct locations in the park and preserve over the next 20 years.

~~Under Alternative 4, scenic air tour landings would be allowed on all glaciers in areas designated as Management Area A, with no daily time restrictions. Noise standards would require overflights to diminish or disperse in some areas, such as over the Old Park. Disturbances would generally be noise-related and short-term (five minutes or less each time).~~

The types of impacts to wildlife that could occur from hiking and camping would include behavioral reactions of short duration and low intensity that would not have long-term impacts on wildlife populations. Areas designated as Management Area A (~~11~~ 16% of the park and preserve) would allow for encounter rates of up to five parties per day, with two parties of up to six people. A large part of this management area covers glaciated areas that have little wildlife, but the increased density of visitors in these lowland areas could result in increased wildlife disturbance, habituation, and food-conditioning. These impacts would occur only occasionally at localized areas throughout the life of the plan.

Wildlife populations, demography, and distribution would be monitored and management action taken if statistically significant changes in these variables could be correlated to

changes in visitor use. Assuming that monitoring is successful at detecting changes and management action is successful at managing visitor use, the degree of impact should be minimized. However, the reactive nature of this approach would still allow some of the adverse impacts to occur although they might later be reversed.

Ungulates: Caribou, Dall Sheep, Moose. Snowmachine use under this alternative would cause behavioral disturbance, increase stress levels, and temporarily displace ungulates, particularly moose and caribou, from areas where snowmachines are regularly used. In some cases, ungulate mortality or injury would occur from wildlife-snowmachine collisions. Because of existing regulations, wildlife populations would not be adversely affected by harvest from guided hunts. Encounters of ungulates with dog teams and skiers would cause short-term displacement, but the limited number of users and the typically short distance covered would limit this impact. There would be short-term changes in wildlife populations and habitats at several distinct locations in the park and preserve over the next 20 years.

Large Carnivores: Black Bear, Brown/Grizzly Bear, Wolf. Snowmachine use under this alternative would cause behavioral disturbance, increase stress levels, and temporarily displace large carnivores from areas where snowmachines are regularly used. In some cases, mortality or injury would occur from wildlife-snowmachine collisions. Snowmachine trails would enhance or modify movements of large carnivores, such as wolves, by providing packed trails that make movements easier and that allow access to new areas. Snowmachine use would displace denning bears and lead to den abandonment. Because of existing regulations, wildlife populations would not be adversely affected by harvest from guided hunts. There would be short-term changes in wildlife populations and habitats at several distinct locations in the park and preserve over the next 20 years.

Small and Mid-sized Carnivores: Lynx, Coyote, Fox, Mustelids. Snowmachine use under this alternative would cause behavioral disturbance, increase stress levels, and temporarily displace small and mid-sized carnivores from areas where snowmachines are regularly used. In some cases, mortality or injury would occur from wildlife-snowmachine collisions. Snowmachine trails would enhance or modify movements of some species, such as lynx and their competitors (coyotes and foxes), by providing packed trails that make movements easier and that allow access to new areas. There would be short-term changes in wildlife populations and habitats at several distinct locations in the park and preserve over the next 20 years.

Birds. Increased motorboat use could be expected and would increase disturbance and displacement of waterfowl, which could lead to increased nest abandonment and predation. There would be short-term changes in waterfowl populations and habitats at distinct locations in the park and preserve, but long-term impacts to certain species, such as swans, could occur in the designated corridors of the Tokositna, ~~Yentna~~ and Kantishna/Muddy Rivers.

Fish. Under this alternative, growth in snowmachine use in the areas of highest present use, such as near Broad Pass and on the upper Tokositna River, would be constrained or dispersed. This would minimize adverse impacts to fish and other aquatic species by reducing potential contaminant fuel spills and unburned fuel deposited by two-stroke engines. Snowmachine use in the proposed access corridors, such as near Broad Pass and the upper Tokositna River, would require additional monitoring to protect aquatic resources. Use in other areas would gradually increase over present use levels, but periodic monitoring of areas would alert managers to any changes in resource health.

Sport fishing in the park and preserve would not result in adverse impacts on fish populations. Dispersed use, restricted use areas, and fish regulations all decrease the relative magnitude of these effects in the park.

Cumulative Effects

Impacts to wildlife in the vicinity of Denali National Park and Preserve are expected to increase as additional development occurs along the Parks Highway corridor and private and commercial activities increase at the southern end of the park. Development on the south side is likely to continue in and adjacent to Denali State Park and in gateway communities such as Petersville, Trapper Creek, and Talkeetna. Continued residential growth, recreational use, and ~~sport~~ hunting from the Healy area west along the Stampede Trail could also result in moderate impacts to wildlife. Commercial rafting on the Nenana River and non-commercial boating on some park rivers and lakes would generate noise and cause temporary displacement of wildlife along the riparian zone, resulting in a minor impact.

Subsistence hunting and trapping, including the potential use of off-road vehicles for subsistence uses (along Cantwell and Windy Creeks) would result in minor adverse impacts on wildlife abundance because of short-term reductions in population of some species such as marten or moose in small areas. Motorized uses, including where permitted for access (Dunkle Hills, Kantishna Hills), can cause noise and visual stimuli that result in behavioral disturbance and temporary displacement of some wildlife species on a seasonal basis. These effects on wildlife species would continue at specific locations throughout the life of the plan.

These activities would result in loss of habitat, behavioral changes such as avoiding developed areas, human-generated noise, and other disturbances to wildlife in the vicinity of Denali National Park and Preserve. (Other disturbances could include introduction of parvovirus and other diseases to wildlife species in Denali from outside sources.)

The combination of impacts from other activities, including those outside the park that directly affect park wildlife, and the management provisions under this alternative, would result in moderate impacts overall, since there would be medium intensity, long-term changes in important wildlife resources. The types and levels of use proposed under this alternative would contribute a minor portion of the overall cumulative impacts to wildlife.

Conclusion

There would be minor to moderate adverse impacts to wildlife populations and habitats under this alternative because of the effects of increased snowmachine and motorboat use on various wildlife species. The level of impacts to wildlife anticipated from this alternative would not result in an impairment of park resources that fulfill specific purposes identified in the enabling legislation or that are essential to the natural integrity of the park.

NATURAL SOUNDSCAPES

As described in chapter 1, NPS Management Policies and Directors Order #47 establish that natural soundscapes are intrinsic elements of the park environment, and thus are part of the resources and values that the NPS is responsible for protecting, no less so than wildlife or other natural features of the parks. At Denali, the sounds of wolves howling, marmots whistling, white-crowned sparrows singing, water rushing through streambeds, wind in the aspen trees, and absolute stillness and quiet are among the natural sounds that are potentially impacted by actions proposed in the alternatives for this plan. Intrusions on the natural soundscape are sounds generated by human activity, much of which qualifies as “noise” under the definition provided by Directors Order #47 that reads, “noise is generally defined as an unwanted or undesired sound, often unpleasant in quality, intensity or repetition.” Noises that obscure natural sounds are of particular concern, primarily those generated by mechanical and motorized devices such as aircraft, snowmachines, motorboats, or chainsaws.

METHODOLOGY

Although the science of measuring noise impacts from motorized vehicles, aircraft, or other equipment is well developed, the research applies mostly to industrial and urban situations and is not particularly useful in evaluating impacts to national parks or other natural areas. Three relevant research approaches have been used:

- 1) Impacts on the natural sound environment, which can be determined by acoustics alone
- 2) Impacts on visitor enjoyment (e.g. Andersen 1993, Gramann 1999);
- 3) Impacts on wildlife (e.g. Fletcher 1978, Radle 1997).

This analysis addresses only the first of these topics, impacts to the natural sound environment itself. The other two topics are addressed in the Recreational Opportunity and the Wildlife sections of this chapter as appropriate.

The analysis explores the questions of intensity, duration, and context for this topic by answering three questions for each alternative:

- How much motorized noise disturbance is allowed? This information is specified by standards associated with management area designations.
- How do these desired future conditions compare to current conditions? Information about current conditions is incomplete, but sufficient data is available to at least indicate the relationship if not to draw firm conclusions.
- How much motorized noise disturbance is likely to occur? This information is derived from trends described in chapter 3 and the Assumptions listed at the beginning of this chapter, combined with the guidance from management area designations and other access management actions.

Natural sounds are a component of Denali's wilderness resource values, which are identified as resources in the park's enabling legislation. In some park locations, such as the Old Park, natural sounds are a unique resource; in other park locations natural sounds are at least an "important" resource in terms of the definitions provided at the beginning of the chapter. Natural sound disturbances do not represent permanent changes in park resources; however, if plan actions allow indefinitely recurring seasonal disturbances the affects would be considered long term.

Sound Monitoring Stations

As a resource for the analysis, Table 4-1 shows how existing data for several locations in Denali National Park and Preserve matches the desired future conditions of each management area. The data were collected through the placement of automated sound stations that measure sound levels and make 5-second digital recordings every 5 minutes (12 samples per hour). The numbers in the table are expressed as a percentage of the samples that exceed desired future conditions for natural sounds. Except for some of the Portal areas, each of these locations has at least two possible designations presented in the alternatives. While the data are illustrative, the sample sizes are generally small and most of the areas sampled are known to have among the highest levels of motorized access (such as established airplane landing areas at Kahiltna Base Camp and the Ruth Amphitheater).

Table 4-1: Percentage of Sample Hours, Days, or Events for which Measured Condition Exceeds Standard, by Location and Management Area

Desired Noise Condition Management Areas	Low			Medium			High			Very High		
	D, E, OP1, OP2			B, C			A, Portal, Corridor West Buttress SUA			Ruth Glacier SUA Portal – Major Landing Area		
Location/Sample Size	% time audible ¹	# motor noises ²	max sound level ³	% time audible ¹	# motor noises ²	max sound level ³	% time audible ¹	# motor noises ²	max sound level ³	% time audible ¹	# motor noises ²	max sound level ³
Kahitna Base Camp 5 days 5/02	40%	80%	31%	31%	80%	31%	24%	80%	2%	6%	0%	2%
Dunkle Hills 5 days 5/01	24%	40%	6%	16%	0%	6%	8%	0%	0%	0%	0%	0%
Dunkle Hills 5 days 2-3/02	38%	100%	3%	30%	60%	3%	21%	0%	0%	6%	0%	0%
Dunkle Hills 6 days 8/02	28%	83%	8%	16%	0%	8%	10%	0%	0%	2%	0%	0%
Pika Glacier 4 days 7/02	8%	100%	27%	3%	0%	27%	0%	0%	0%	0%	0%	0%
Pika Glacier 9 days 8/02	21%	100%	19%	14%	11%	19%	11%	11%	3%	3%	0%	3%
Ruth Amphitheater 9 days 5/02	45%	89%	33%	40%	89%	33%	34%	89%	4%	18%	0%	4%
Ruth Amphitheater 7 days 6/02	36%	86%	38%	31%	57%	38%	30%	57%	5%	23%	29%	5%
Ruth Amphitheater 7 days 7/02	43%	100%	34%	40%	100%	34%	38%	71%	4%	24%	57%	4%
Stampede Airstrip 13 days 9/02	9%	62%	11%	6%	0%	11%	3%	0%	4%	1%	0%	4%
Stampede Airstrip 31 days 10/02	4%	13%	6%	2%	0%	6%	1%	0%	0%	0%	0%	0%
Stampede Airstrip 20 days 11/02	8%	35%	3%	4%	0%	3%	2%	0%	0%	1%	0%	0%
Stampede Airstrip 15 days 4/03	3%	53%	10%	2%	0%	10%	1%	0%	0%	0%	0%	0%
Stampede Airstrip 31 days 5/03	3%	32%	9%	1%	0%	9%	0%	0%	0%	0%	0%	0%
Stampede Airstrip 29 days 6/03	2%	34%	18%	1%	0%	18%	0%	0%	3%	0%	0%	0%

¹The indicator is the percentage of each hour that a motorized noise is heard. Because the data collection method presently used records five seconds out of every five minutes, the indicator essentially refers to the percentage of 5-second samples during which a motorized noise is heard, with 12 such samples each hour. The number in this column refers to the percentage of hours when the standard for the management area would be exceeded.

²The indicator is the number of motorized noises heard during the course of a 24-hour day. The number in this column reflects the percentage of days when the standard for the management area would be exceeded.

³The indicator is the maximum measured sound level of a motorized event. The number in this column reflects the percentage of motorized events for which the sound level would exceed the standard for the management area.

For all locations except the Dunkle Hills area, all of the identifiable motorized noises were aircraft. For the Dunkle Hills in February–March, 37% of the identifiable noises were aircraft, 34% were snowmachines, and 29% were trains. In May, 94% of the noises were aircraft, 5% were snowmachines, and 1% was trains. In August, 66% of the noises were aircraft, 19% were vehicles, and 15% were trains.

Backcountry Ranger Observational Data

In addition to the information collected at automated sound stations, backcountry rangers made systematic observations of motorized noise intrusions during the summer seasons of 1999 and 2000 in the backcountry of the Old Park (Morgan and Van Horn 2001). Although not reported in the same format as this plan's indicators and standards, these observations provide some information by which to evaluate the application of standards in this part of the park and preserve, where no data is yet available from automated sound stations.

Data were collected from 6/12/99 to 9/5/99 and again from 5/28/2000 to 9/5/2000 within the Denali Wilderness, primarily from patrols from the park road corridor, and are thus primarily relevant to the eastern side of the Old Park. Rangers were instructed to listen for aircraft throughout as much of the patrol day as possible, including periods of time when they were around their camp. Each patrol recorded the overall time of the sample period that they (the rangers were usually in pairs) were actively listening for aircraft. While the sampling was opportunistic and statistically non-random, it did parallel the times and locations that park visitors travel through the backcountry.

Within the overall sample period, the observers recorded the start and stop times of audible aircraft noise. This period of time, which could include overlapping noise from several successive aircraft, was labeled an "overflight event." The observers recorded the number and type of aircraft for each overflight event. They also rated the intensity of the noise for each overflight event. The rating for each overflight event was based on the peak noise level that occurred during the event. Key statistics included the following:

- There was an average of 19.5 overflight events (25 aircraft) per patrol, an average of 9.1 overflight events (11.7 aircraft) per day, and an average of 1.4 events (1.8 aircraft) per hour.
- The average duration of overflight events per day of sampling was 32.1 minutes.
- An average sampling day lasted 6.6 hours.
- The average duration of overflight events per hour of sampling was 4.8 minutes.
- The average duration of a single overflight event was 3.4 minutes.

Maximums noted included:

- 8 overflights in an hour that lasted for nearly 30% of that hour
- 31 overflight events (51 separate aircraft) in a day
- Aircraft noise audible for 30% of the time during an afternoon hike

The patrol rangers rated sound level on a three-part scale as follows:

- 1 – Faint, barely audible, aircraft might be only heard and difficult to locate visually.
- 2 – Clearly audible above-normal background noise.
- 3 – Distracting for conversation, completely dominates soundscape drowning out even loud sounds of nature such as wind or sounds of water.

Table 4-2 summarizes the sound level observations of aircraft events.

Table 4-2: Number of Overflight Events by Intensity Rating.

Intensity Rating	Number of Events	Percentage of Total
1	660	43.4
2	695	45.7
3	160	10.5

Backcountry Visitor Survey

One further study provides data about the amount of noise heard in the Denali backcountry. *A Survey of Overnight Backcountry Visitors to Denali National Park and Preserve* conducted in 2000 asked questions of respondents about the number of aircraft encountered while hiking in the backcountry. Because the universe of survey respondents was limited to visitors who obtain a permit for overnight camping during summer months, the response primarily reflects conditions in the backcountry of the eastern side of the Old Park.

Out of 190 hiking parties surveyed, the average number of aircraft seen per day of the trip was 4.87. The average number of aircraft seen or heard per day as a percentage of hiking parties were as follows:

Table 4-3: Average Number Of Aircraft Seen Per Trip Day By Percent Of Hiking Parties	
Average Number of Aircraft Seen Per Trip Day	Percent of Hiking Parties*
10 or more	11.1%
6 to 9.99	21.7%
3 to 5.99	33.6%
1 to 2.99	22.1%
less than 1	11.5%
*Survey response included 190 hiking parties. The number indicated reflects the percent of the total that experienced the average number of aircraft per day in the left hand column.	

IMPACTS OF THE MODIFIED PREFERRED ALTERNATIVE

This alternative would have negligible overall impacts on the natural sound environment of the Denali backcountry. Standards that would require improvements in sound conditions in some areas, such as the Old Park, would be offset by increasing noise in other locations in the southern additions. There would ~~still~~ continue to be major cumulative adverse impacts because of the high intensity of airplane and snowmachine noise in large portions of the park additions.

In this alternative, there would be new soundscape standards established for management areas throughout the national park and preserve and a set of tools identified for managing access to achieve the standards. The proportion of the park and preserve that falls within each standard would be as follows:

Natural Sound Disturbance	% of park backcountry
Very High	32 <u>3</u> %
High	94 <u>9</u> %
Medium	921 <u>92</u> %
Low	7973 <u>79</u> %

In addition, there would be ~~year-round corridors designated on the Kantishna, Muddy, and east and west fork of the Yentna Rivers~~ summer season Corridors designated on the Kantishna, Muddy Rivers, and lower Tokositna Rivers. ~~While other corridor designation in the Dunkle Hills, and on two mining access routes in the Kantishna Hills.~~ There would also potentially be winter season Corridors designated in the Tokositna River and Dunkle Hills areas, and Tokositna valley areas. ~~While Corridors in the Dunkle Hills and Tokositna River areas would not differ in allowed natural sound disturbance from the surrounding area, these 109-70 miles of year summer round e Corridors and 3.5 miles of winter Corridor along Cantwell Creek would allow a High level of natural sound disturbance that could have border impacts on the surrounding management areas, where a lesser degree of disturbance would be expected.~~

As demonstrated by the table below, where standards can be compared to available data there would be a mixture of results. The amount of motorized noise in the Old Park should decline substantially, as should some localized areas such as the Ruth Amphitheater landing area. Access management tools would be applied to bring conditions into standard. However, the amount of motorized noise in areas such as the northern additions or localized areas like Kahiltna Base Camp could remain the same or even accommodate some additional noise.

Location	Natural Sound Disturbance Standard	Comparison of Existing Conditions to Standard
Eastern portion of Old Park	Low	Both the NPS patrol observations and the report from the 2000 backpacker survey demonstrate that the eastern portion of the Old Park receives considerably more airplane noise than the Low standard for natural sound disturbance would permit. The standard would allow only 1 motorized noise per day louder than natural ambient, while the average for one survey is 9.1 per day, for the other 4.9 per day. Some of these airplane noises may not reach the natural ambient threshold, but from the sound level rating system used by the ranger patrols, at least 56% of the motorized noise likely reaches that level. In addition, 10.5% may exceed the maximum sound level of 40 dBA.
Stampede Airstrip	Medium	Data from the airstrip at Stampede Mine show that the level of natural sound disturbance generally falls within the range of variation allowed by Medium standards. One exception was the maximum sound level, which for five out of six months exceeded the standard of 40 dBA in between 6% and 18% of motorized noise samples.
Dunkle Hills	High	Data from the Dunkle Hills during winter months demonstrate that the standard for a High level of natural sound disturbance is exceeded at times. Existing samples from the area show that about 21% of hours exceed the standard for time audible during late winter months, which allows motorized noise for 25% of any hour. During summer months, the percentage of hours exceeding the standard was only 8% to 10%.
Ruth Amphitheater landing area	Very High	Data from the Ruth Amphitheater show that the Very High standards for the Ruth Glacier Special Use Area are exceeded between 18% and 24% of measured hours for the percent time motorized noise is audible. Standards are also sometimes exceeded for the number of motorized noises louder than natural ambient heard during the course of the day, up to 57% of days during a July sample period. Conditions at the landing area are likely to be considerably noisier than the surrounding area, however.
Kahiltna Base Camp	Very High	The small data sample at Kahiltna Base Camp shows that the Very High standard is generally met.
Pika Glacier	<u>Medium</u> <u>High</u>	Measurements taken near the airplane landing area on the Pika Glacier—within the Portal area— show that all standards for a <u>High-Medium</u> level of natural sound disturbance were <u>met during a July sampling period; however, 11% of both sample hours (for percent time audible) and sample days (for number of motorized noises over natural ambient) exceeded standard in an August sampling period.</u> <u>Samples show that the 14% of hours exceed the standard for time audible, and 11% of days (one day of the nine sampled) had more than the standard for the number of motorized noises louder than natural ambient. In both July and August sample periods the maximum sound level of 40 dBA was frequently exceeded, 19% and 27% of noise events respectively.</u>

General aviation landings would continue to be allowed throughout the park additions and preserve consistent with existing regulations. This method of access is not expected to grow substantially over time, but this alternative would allow infrequent loud noise associated with take-offs and landings at lakes suitable for float plane landings and other scattered off-airport landing locations.

Scenic air tour landings would be restricted to glaciers in Management Area A ~~and to the Pika and Eldridge Glaciers when climbers and mountaineers are not present~~ and would be allowed to a lesser extent on the Pika and Eldridge Glaciers. Present use levels by ~~climbers and mountaineers on the Pika and Eldridge would allow an increase in scenic tour landings over current numbers. However, as climbing and mountaineering use grows, scenic tour use could be limited.~~ Between 1999 and 2004, only two scenic air tour landings took place outside the allowable area under this alternative, thus, there would be little immediate impact on existing airplane landings or the accompanying noise. Large numbers of scenic air tour overflights could continue to produce high intensity levels of noise between the Kanikula, ~~Buckskin,~~ and upper Ruth and Kahiltna glaciers in the southern additions, with a particular concentration of noise over the Ruth and Tokositna Glaciers. This noise would be the most distinctive part of the sound environment during the summer visitor season.

A limit of 1,500 per season on climbing Mount McKinley would indirectly restrict growth in air taxi access to Kahiltna Base Camp, ~~and although~~ growth in climber demand is unlikely to reach the limit within the life of the plan. The 1,500 limit would allow 22% more climbers than in 2002, when a small sample of days showed that noise standards were exceeded in this area. As a result, other access management tools are likely to be applied before restrictions on climber numbers would affect the amount of noise.

Snowmachine access would be managed through the application of access management tools to achieve natural sound disturbance standards set for each management area. Snowmachine noise would likely reach those standards on weekend days in late winter during the course of the plan in the Dunkle Hills/~~Broad Pass~~ area as well as the lowlands, lower glaciated areas, and foothills around the Ruth, Tokositna, and Kanikula Glaciers, all of which are designated for a High standard of natural sound disturbance. Noise would also increase during late winter weekdays over the duration of the plan as winter visitation in Alaska increases, although it would not be expected to reach the High standard.

Rivers that support existing use of motorboats (Kantishna, Muddy, and Tokositna, Yentna) are designated corridors under this alternative. Noise levels from motorboats are likely to remain below levels allowed under the standard for a High level of natural sound disturbance during the life of the plan. The highest level of noise would be experienced on the lower Tokositna River during the summer visitor season and on the Kantishna and Muddy Rivers during subsistence and ~~sport~~ general hunting seasons. The Yentna River may also have some motorboat use, but the use level is believed to be small and could be accommodated even within the Low natural sound disturbance standard applied to the southwest Preserve.

In this alternative, the Tokositna River also falls into the Ruth Glacier Special Use Area, which allows a Very High standard for natural sound disturbance. This river is likely to have growth in recreational motorboat traffic particularly accessing private visitor facilities along the lower section of the river. During the summer visitor season when

motorboat use occurs, motorboat noise would continue to have relatively little impact compared to airplane noise in this area.

Under this alternative, the park road would be maintained to mile 7 during winter months for administrative purposes only to remove ice from the park road, although a snow-covered surface would remain for winter recreation. This action would result in heavy road equipment traveling up four miles of the park road between October and March. Experimentation has proved that the required maintenance can generally be accomplished before 10am and is required only occasionally. Natural sound disturbance would be minimal and would likely fit within the range allowable for a Low standard of natural sound disturbance.

Several additional trails would be constructed in Kantishna along with designated campsites and single trails ~~that~~ would be constructed at Wonder Lake, Eielson Visitor Center, Healy Overlook, and ~~Wildhorse Creek~~ Thorofare Bluffs. Trail construction could include the use of motorized equipment such as power wheelbarrows or chainsaws as well as aerial delivery of material if the minimum tool requirement is met, all of which would create noise disturbances. The same might also be required for trail maintenance in future years. The noise disturbances would be localized in impact to the places near where construction or maintenance was occurring, and could temporarily exceed standards.

The National Park Service would apply the minimum requirement process to the entire backcountry and would develop methodologies for minimizing aircraft use for administrative and research purposes. These actions should improve natural soundscape conditions in the backcountry.

Cumulative Impacts

Denali National Park and Preserve has become a noisier place since the park expansion in 1980. Aircraft are primarily responsible for increased natural sound disturbance, particularly the expansion of scenic air tours since the late 1980s, which produce much of the existing motorized noise over the eastern portion of the Old Park, around Mount McKinley, and along the south side of the Alaska Range between the Kahiltna and Eldridge Glaciers. The National Park Service has contributed by authorizing concessionaire aircraft to land on glaciers, affecting primarily the area between the Kahiltna and Eldridge Glaciers, and through its own gradual expansion of airplane and helicopter use to support research and administrative activities, which has impacts park wide. Military use of the Susitna Military Operations Area, which has been occurring at present levels since 1995, also has a substantial adverse impact on the southwestern park and preserve extending east to the Ruth Glacier.

Snowmachine access plays a role during winter months, particularly in the Broad Pass/Dunkle Hills region and low-lying areas in and around the Tokositna River valley, which have become popular riding destinations from the Parks Highway as power and range have increased and ownership has become more common. The closure of the Old

Park to snowmachine access in 2000 restricted areas that were only lightly used and primarily served to inhibit future expansion of snowmachine access and accompanying noise to new areas.

If one or more lodges in Kantishna began operating in the winter and supported snowmachine access, this alternative would allow such access to occur. In the ~~southern~~ Kantishna Hills, there would be a ~~High-Medium~~ standard for motorized noise. Depending on the scale of service provided by the lodges, this threshold could be reached in some parts of the southern Kantishna Hills within the life of the plan. Much of the noise impact would occur during late winter months. ~~Adjacent areas would have a Low or Medium standard for natural sound disturbance, which would require dispersal of snowmachine access in these areas.~~

If a trail were cleared from Nenana to Lake Minchumina and services were offered to support snowmachine access, this alternative would allow only a Low standard of natural sound disturbance within the park and preserve. During late winter months, there would likely be some additional natural sound disturbance, although it would be limited by the standard.

Collectively, these actions have had (and would have) a major adverse impact on the natural soundscape of Denali because of high intensity, long-term motorized disturbances in the Old Park, around Mount McKinley, in the Dunkle Hills/Broad Pass area, and over the southern glaciers. The actions in this alternative provide a negligible impact to the overall natural sound environment, mitigating the impacts of some past actions, but allowing motorized noise to increase in other locations. Overall, there would continue to be a major adverse cumulative impact to the natural soundscape of the park and preserve from the actions in this alternative combined with other past and possible future actions, but this alternative contributes only a minor portion of those impacts.

Conclusion

This alternative would have negligible overall impacts on the natural sound environment of the Denali backcountry. Although the amount of motorized noise would substantially decline in the Old Park, these actions would allow medium to high intensity, long-term increases in motorized noise in other locations, including ~~the portions of the northern additions east of the Kantishna Hills,~~ the Dunkle Hills and Tokositna River areas during winter months at times that use is presently low, and over portions of the southern additions between the Kahiltna and Eldridge Glaciers during summer months. Some temporary noise would be added because of trail and campsite construction. There would still be major cumulative adverse impacts because of the high intensity airplane noise in the Ruth Amphitheater, over the southern glaciers, lowland areas between the Kahiltna and Ruth Glaciers, and in the Dunkle Hills/~~Broad Pass~~ area.

The level of impacts to the natural soundscape anticipated from this alternative would not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are essential to the natural integrity of the park.

WILDERNESS RESOURCES

The Alaska National Interest Lands Conservation Act designated most of the Old Park as the Denali Wilderness, to be managed under the provisions of the Wilderness Act. ANILCA also identified the protection of “wilderness resource values” and the provision of associated “wilderness recreational opportunities” to be important purposes of the park additions and preserves. In addition, a wilderness suitability review conducted as part of the 1986 General Management Plan concluded that 3.73 million acres of the park additions were also suitable for wilderness designation, and NPS Management Policies direct the NPS to “take no action that would diminish the wilderness suitability of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed.” The extent of impact to the wilderness resources of Denali, including both wilderness character and wilderness experience, is therefore a central concern of this analysis.

METHODOLOGY

Working from the definitions given in the Wilderness Act, the clarifications (including ANILCA provisions) under the Wilderness Management section of chapter 2, and the tradition of wilderness preservation at Denali described in chapter 3, the following “wilderness resource values” have been identified for Denali National Park and Preserve.

- Perpetuation of natural ecological relationships and processes and the continued existence of native wildlife populations in largely natural condition
- Absence of permanent human structures, including buildings, roads, trails, dams, and communications facilities
- Opportunities for solitude including:
 - Freedom from the reminders of society
 - Privacy and isolation
 - Absence of distractions such as large groups, mechanization, unnatural noise, signs, and other modern artifacts
- Opportunities for primitive and unconfined recreation, which have the following characteristics:
 - Self-sufficiency, absence of support facilities or motorized transportation
 - Direct experience of weather, terrain, and wildlife with minimal shelter or assistance from devices of modern civilization
 - Lack of restriction on movement; freedom to explore in the way that is desirable given conditions of weather, terrain, and personal ability; ability to be spontaneous
 - Minimal formal regulatory requirements

Impacts on wildlife, soundscapes, and other natural resources are addressed in the Wildlife, Vegetation, Soil and Water, and Natural Soundscapes sections. The analysis in this section will focus on wilderness character and wilderness experience, which are

integrally related because much of wilderness character can only be subjectively determined by the visitor's experience (for example, solitude or freedom of movement).

Impacts on wilderness character and experience are determined by comparing the desired future conditions described by management area standards to current conditions and to likely future conditions given predicted changes in use and varying management area designations among alternatives.

IMPACTS OF THE MODIFIED PREFERRED ALTERNATIVE

The actions in this alternative would have negligible new impacts on wilderness resources in the Denali backcountry, protecting and improving conditions in some areas while allowing the loss of some quality in others. There would still be major adverse cumulative impacts because of ongoing motorized access in parts of the southern additions and the absence of opportunities for solitude on the West Buttress route of Mount McKinley.

Absence of Permanent Structures

There would be new trails and limited designated campsite development in this alternative, bringing not only permanent facilities – potentially including food storage and sanitation facilities at up to five sites in the Kantishna area – but also the noise and human presence associated with trail construction and maintenance.

However, in the Kantishna Hills area the trails would generally either replace or improve existing social trails or old community and mining access trails. The actions would take place outside of areas determined suitable for wilderness designation.

Short sections of trail would be constructed within the Old Park at Wonder Lake, at Eielson Visitor Center, Thorofare Bluffs, and at the Healy Overlook, but they would replace existing obvious social trails and fall partly within the Backcountry Day Use area, outside the designated wilderness.

~~Most impacted would be the Wildhorse Creek area, where an area determined suitable for wilderness designation would have new trail construction in an area that presently has no signs of human structures or ongoing human presence. However, the trail would occupy only part of a single creek valley.~~

Opportunities for Solitude

This alternative establishes a variety of standards that would protect opportunities for solitude. Important among these are the following standards.

Standards for the number of encounters with other parties in this alternative provide a balance between areas that emphasize privacy and isolation and areas that allow more use while still protecting wilderness qualities, as the table below demonstrates.

Number of Encounters with Other Parties				
Descriptor	Low	Medium	High	Very High
Standard	3 0/week	2/day	5/day	10/day
% of Park & Preserve	44 49%	29 40%	15 11%	128-70 miles summer Corridors, 135-19.5 miles winter Corridors, <u>Backcountry Hiker</u> , <u>West Buttress SUA</u>
There is no standard for the number of encounters with other parties at 9 Portals and in the West Buttress Special Use Area.				

Standards for encounters with large groups limit impacts on vegetation, wildlife, and the solitude of other visitors, as well as mitigate the impacts of adding group educational and guided activities in areas where allowed.

Possible to Encounter Large Groups?			
Descriptor	No	Yes	
Standard	0 groups	1 group/ day	2 groups/ day
% of Park & Preserve	56 49%	29 40%	15 11%
“Large groups” are parties larger than 6 people.			

Standards for camping density assure that visitors throughout almost the entire backcountry would have the opportunity to camp out of sight and sound of other visitors.

Possible to Camp Out of Sight and Sound of Others?			
Descriptor	Low	Medium	High
Standard	Yes, always	Not always at peak season	No, during peak season
% of Park & Preserve	99%	128-70 miles summer Corridors, 135-19.5 miles winter Corridors, 5 Portals	3-2 Portals, West Buttress Special Use Area

Standards for the number of encounters with evidence of modern human use ensure that in most of the backcountry visitors would continue to encounter few or no signs of modern equipment, as demonstrated by the table below. Some exceptions occur in the West Buttress Special Use area, corridors, Portals, and backcountry hiker areas.

Number of Encounters with Evidence of Modern Human Use			
Descriptor	Low	Medium	High
Standard	1/backcountry trip	3/day	5/day
% of Park & Preserve	85 89%	15 11% + 5 Portals	3-2 Portals, BC Hiker Areas, West Buttress SUA, 128-70 miles summer Corridors, 135-19.5 miles winter Corridors

As visitation to the park increases, these standards protect wilderness character and experience by triggering management action to disperse or limit the density of visitors in locations where ~~problems arise~~ wilderness resource values are jeopardized. While Backcountry Hiker areas, Corridors, Portals, and the West Buttress Special Use area allow higher levels of visitor use and landscape impact than is typical of the Denali backcountry, collectively these represent a small area of the park and preserve.

Application of these standards primarily affects the park additions and preserve, since the Denali Wilderness was already managed to achieve similar standards. However, for the Old Park these standards do provide more definition for qualities such as evidence of modern human use, and they do distinguish the western portion of the Old Park (OP2) as an area that should protect current conditions of very low use density.

The amount of motorized equipment used for access and the attendant noise expected under this alternative is described in detail in the Natural Soundscapes section of this chapter. As documented in that section, ~~80~~73% of the park and preserve would be designated within a management area that allows Low levels of natural sound disturbance, ~~92~~91% in areas that allow Medium sound disturbance, and ~~96~~96% in areas that allow a High level of sound disturbance. In addition, there are ~~128~~70 miles of corridor in the summer and ~~135~~19.5 miles in winter along with five Portals that would allow a High level of sound disturbance, and ~~3~~2 Major Landing Areas plus 2.5% of the park and preserve in the seasonal Ruth Glacier Special Use Area that would allow a Very High level of natural sound disturbance. Overall, under this alternative there would be negligible impacts on the natural soundscape at Denali; although conditions over the designated wilderness of the Old Park should improve, they would likely worsen in other areas that have been determined suitable for wilderness designation, particularly those areas designated as Management Area A.

The park road would be maintained to mile 7 during winter months for ice removal only. This action would retain noise and signs of heavy equipment to a 4-mile stretch of road for approximately 6 months, but the impact can be mitigated to a degree by short hours of operation. Only a small portion of the park and preserve and no designated wilderness is affected except for cross-boundary noise.

There would be up to ~~135~~19.5 miles of corridors in winter, some of which could be marked with route markers. This action would provide more guidance and add more signs of management and human presence than is typical of the wilderness experience at Denali, but they would be used only if the minimum tool requirement is met and other, less intrusive measures (such as providing maps, guidance with natural land features) are ineffective.

Opportunities for Primitive and Unconfined Recreation

There would be a limit of 1,500 climbers per season on Mount McKinley. Within the 20-year life of the plan, demand would grow to an estimated 1,405-1,470 climbers per year.

Thus, the expectation is that the limit would not be reached and it would serve primarily to establish a ceiling on visitors if growth is faster than anticipated.

Mountaineers would be required to carry out human waste from the West Buttress above the 14,000-foot camp ~~feet~~ and from campsites within one-half mile of air taxi landing locations on glaciers. At present, this would require visiting the NPS ranger station at Talkeetna to obtain a Clean Mountain Can and to return it after use, although other options may be available within the life of the plan.

There would initially be no new registration requirements, but new requirements would be added if certain criteria were met. It is anticipated that these criteria would trigger new requirements on overnight and winter day-use activities from the Kahiltna Glacier east to Cantwell in the near future.

None of these actions would result in restrictions on freedom of movement once the visitor has entered the backcountry. The burden on visitors prior to entering the backcountry is expected to be light if the National Park Service is successful in making registration convenient and simple.

Cumulative Impacts

The establishment of unit quotas in the 1976 Backcountry Management Plan protected wilderness experience in the backcountry of the Old Park by limiting encounters, dispersing visitors and visitor impacts, and insuring that the great majority of visitors could camp out of sight and sound of others. The permit requirement for the Old Park does restrict freedom of movement since visitors must camp in the unit for which they have a permit on any given night. However, day users are not similarly restricted. The 60-day registration requirement for climbing Mount McKinley and Mount Foraker does not restrict freedom of movement once climbers enter the park.

The authorization of commercial air taxi landings for climbers on the Kahiltna glacier at the Denali Wilderness boundary, combined with improvements in climbing equipment and the popularization of the West Buttress as a mostly non-technical route to the summit of Mount McKinley, has led to large increases in the number of climbers in this area, from 124 in 1970 to a peak of 1,305 in 2001. Because each expedition takes 17 days on average and the primary climbing season is only 2-3 months long, a large amount of visitors concentrate on the West Buttress every year, during which time opportunities for solitude are not available.

The increase in snowmachine access particularly in accessible areas of the park additions in the Broad Pass/Dunkle Hills area and the Tokositna River valley has greatly increased the number of encounters with other parties, the evidence of modern human use, and natural sound disturbance, detracting from the wilderness qualities of these areas. Likewise, the expansion of scenic air tour access in response to changes in visitor demand has increased motorized noise across large areas of the Old Park wilderness and the glaciated area between the Kahiltna and Ruth glaciers. This alteration in wilderness

resources is long-term, occurring every season, and is consistently observable over large portions of the backcountry and therefore a high-intensity change to wilderness resources.

The National Park Service has constructed trails that extend into the Congressionally designated wilderness of the Old Park, and will construct additional trails as specified by the 1997 *Entrance Area and Road Corridor DCP*. These trails are permanent new structures in the wilderness area, but total fewer than 20 miles within the 1.9-million-acre Denali Wilderness, and therefore represent a low intensity change in wilderness character. The National Park Service has also established seasonal administrative camps at Kahiltna Base Camp and at the 14,000-foot level on Mount McKinley, and generally increased the amount of research and administrative activity in the backcountry, including the use of aircraft and other motorized equipment and some temporary and long-term installations of research equipment. This heightened administrative presence is observable to the visitor but generally is not a consistent change over any particular area of the park except for the administrative camps, and is therefore a medium intensity, long-term alteration in the wilderness resources of the park and preserve.

These past, present, and future actions have had a major adverse impact on the wilderness resources of the park and preserve, largely because of the long-term, high-intensity changes caused by airplane and snowmachine access over a large portion of the park and preserve and the loss of opportunities for solitude on the West Buttress of Mount McKinley during the primary climbing season. The actions in this alternative constrain these impacts from spreading and may offer limited improvement in some areas because of the imposition of management area standards. However, there would still be major adverse cumulative impacts. This alternative would be responsible only for only small, isolated adverse impacts such as the few additional structures (trails) and the maintenance of a short section of the park road during winter months.

Conclusion

Under this alternative, there would be negligible new impacts to the wilderness resources of the Denali backcountry. Positive changes would occur in some locations, such as in the designated wilderness of the Old Park, but other areas that have wilderness qualities would likely lose some opportunities for solitude. The proposed standards for encounters with other parties, encounters with large groups, ability to camp out of sight and sound of others, and evidence of modern human use would protect wilderness resource values in much of the park as visitation grows, but would generally still allow increases in visitor use across most of the western portion of the Old Park, park additions, and preserve. There are minor adverse impacts from the construction of new trails and campsites and very limited restrictions on freedom of movement. However, there would still be major adverse cumulative impacts because of the ongoing absence of solitude on the West Buttress route of Mount McKinley during the primary climbing season and high levels of encounters, noise, and motorized transport in ~~areas such as the Kantishna Hills, Dunkle Hills, and the area~~ between the Kanikula and Ruth Glaciers in the southern park additions.

The level of impacts to wilderness character and experience anticipated from this alternative would not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are essential to the natural integrity of the park.

SUBSISTENCE RESOURCES AND OPPORTUNITIES

The 1980 additions to Denali National Park and Preserve are open to subsistence uses in accordance with Section 202(3)(a) of ANILCA. Lands within the former Mount McKinley National Park are closed to subsistence activities. Congress found and declared in Title VIII, Subsistence Management and Use, Section 801(3), that the continuation of the opportunity for subsistence uses of resources on public and other lands in Alaska is threatened by the increasing population of Alaska, with resultant pressure on subsistence resources, by sudden decline in the populations of some wildlife species that are crucial subsistence resources, by increased accessibility of remote areas containing subsistence resources, and by the taking of fish and wildlife in a manner inconsistent with recognized principles of fish and wildlife management.

Furthermore, Congress declared it to be the policy in Section 802(1), that, consistent with sound management principles and the conservation of healthy populations of fish and wildlife, the utilization of the public lands in Alaska is to cause the least adverse impact possible on rural residents who depend upon subsistence uses of resources of such lands; consistent with management of fish and wildlife in accordance with recognized scientific principles and the purposes for each unit established, designated, or expanded by Title II; it is the purpose of Title VIII to provide the opportunity for rural residents engaged in a subsistence way of life to do so.

Guided by the enabling legislation and mandates for Denali National Park and Preserve, and policies and Congressional intent of ANILCA Title VIII, the following section presents an analysis of the impacts likely to occur under the preferred alternative.

METHODOLOGY

Methodology for assessing impacts to subsistence consisted of literature review and consultation with subject matter experts.

This analysis focuses on the three key subsistence areas of the park: the northwestern park and preserve region near Lake Minchumina; the southeastern park region near Cantwell; and the southern Kantishna Hills region near Kantishna. This analysis assumes that adverse impacts to subsistence resources and opportunities from subsistence users are negligible because subsistence use is very low, especially compared to recreational use of the park.

IMPACTS OF THE MODIFIED PREFERRED ALTERNATIVE

This alternative would have minor to moderate adverse impacts on subsistence resources and opportunities because it would result in increases in non-subsistence snowmachine use and generally higher levels of recreation use particularly along trails and corridors in

subsistence areas, both of which would create unfavorable conditions for subsistence wildlife populations and increase conflicts between recreational and subsistence users.

Under this alternative, access by snowmachine to the park and preserve additions would continue to grow. Designating corridors for winter use would focus use in the following places: from the southern park boundary to the Old Park boundary near the West Fork Chulitna, Cantwell Creek, and Bull River; ~~to the toes of the Ruth, Tokositna, and Kanikula glaciers from the Tokositna River; along the Yentna, Tokositna, and Kantishna/Muddy Rivers;~~ and along the lower and upper Tokositna River as far as the mouth of Wildhorse Creek. In a future wilderness proposal, accommodation would be made as necessary for recreational snowmachine access along these 19.5 miles of winter corridors ~~and throughout those areas designated as Management Area A (11% of the total park area and along 135 linear miles of winter corridors).~~ Winter corridors would result in areas of more concentrated snowmachine use and areas designated as Management Area A would allow for an encounter rate of up to five parties per day, including two parties more than to six people. However, the only places these high use areas would overlap with areas ~~Nearly all of the winter corridors overlap with areas~~ currently or traditionally used for subsistence activities would be along Cantwell Creek and Bull River, and the Corridors would be designated only if there is sufficient demand.

Except for the ~~Kantishna area and the Broad Pass area between Cantwell Creek and the West Fork of the Chulitna River (which are zoned as Management Area A),~~ all other corridors, all subsistence use areas would be zoned as Management Area B or D. These management areas allow for low to medium encounters with other people, very little evidence of modern human use, and low to medium disturbance of natural sounds. If standards in these categories are approached or exceeded, non-subsistence use would be curtailed or mitigated. If non-subsistence use is curtailed or mitigated, it could have less of an impact on subsistence resources and opportunities. The types of impacts that could be mitigated are described throughout this section.

Cantwell

The Cantwell subsistence area would be zoned as Management Area B, and there could be two winter season Corridors in the vicinity of Cantwell Creek and Bull River. Management Area B allows for medium encounters with other people, very little evidence of modern human use, and medium disturbance of natural sounds. The Corridors allow very high levels of encounters and high levels of natural sound disturbance and evidence of modern human use. If standards in these categories are approached or exceeded, non-subsistence use would be curtailed or mitigated. If non-subsistence use is curtailed or mitigated, it could have less of an impact on subsistence resources and opportunities. The types of impacts that could be mitigated are described throughout this section. ~~Under Alternative 4, the Broad Pass area between Cantwell Creek and the West Fork of the Chulitna River would be designated as Management Area A, allowing for high disturbance to natural sounds and an encounter rate of up to five parties per day, including two parties of six people. Increased recreational use in the Broad Pass~~

~~area could negatively affect subsistence hunters who rely on this area for subsistence purposes.~~

Several different impacts to subsistence wildlife populations and subsistence use activities could be expected as documented by the Denali Subsistence Resource Commission. For several years, subsistence users have expressed concerns about the impacts and conflicts of increasing recreational use and increasing non-subsistence snowmachine use on subsistence resources and subsistence activities. Members of Denali's Subsistence Resource Commission have specifically expressed concerns regarding the effects of increasing levels of snowmachine use in the Broad Pass/Cantwell area upon moose, furbearers, and ptarmigan populations and their distributions (Denali Subsistence Resource Commission Meeting Minutes, April 30, 2001; April 29, 1996; August 9, 1996; and June 28, 1993). The Denali Subsistence Resource Commission Meeting Minutes (June 1993) document high levels of non-subsistence related snowmachine use in the Cantwell area. It was noted that riders were primarily using drainages and basins, essentially saturating the area and displacing furbearers, causing local trappers to pull their traps prematurely in December of that year. This trend has persisted in subsequent years (pers comm. Hollis Twitchell 1/13/05). As the range of non-subsistence snowmachine use overlaps with subsistence use areas, the potential for conflict between these user groups increases.

Non-subsistence snowmachine users would interfere with subsistence traplines, displace furbearers, and create paths that encourage animals to travel farther from places where subsistence activities typically occur. ~~Trappers begin trapping as early as November 1. The trapping season closes by the end of February; however, increasing levels of non-subsistence snowmachine use in the Cantwell/Broad Pass area would continue to displace wildlife, and~~ Trappers would continue to pull their traps by December because it would be inefficient to set traps in an area in which furbearers have been displaced. This would constitute a loss of an opportunity for subsistence users in that area.

Increased use of the park, particularly non-subsistence snowmachine use, would likely displace moose and caribou from critical wintering areas on park lands in the Windy Creek, Bull River and Cantwell Creek drainages. Local moose populations and the Cantwell group of the Nelchina Caribou herd use areas within the former Mount McKinley National Park and the ANILCA park additions of Windy Creek, Cantwell Creek, and the Bull River drainages during winter. These areas provide important winter habitat for moose and caribou because snow depths associated with the pass area are less than in other areas.

Non-subsistence snowmachine use is often concentrated in these high-elevation basins where riders spend many hours at a time. These basins provide critical winter habitat for moose and caribou. Moose and caribou would continue to be displaced from these critical wintering areas as non-subsistence snowmachine use increases. This could significantly increase the stress and nutritional demands upon moose and caribou and result in some

moose or caribou mortality, depending on the environmental conditions and the body reserves of moose or caribou in a given year.

Non-subsistence snowmachine use originating in Cantwell begins when adequate snow cover is present, and during early winter, use is relatively low. As snow pack increases so does snowmachine use. In late winter when the days are lighter, warmer, and there is adequate snow cover, non-subsistence snowmachine use is highest. This corresponds with the time of the year when moose and caribou are at their lowest nutritional states. Non-subsistence snowmachine use would continue to induce stress on moose and caribou ~~in the Windy Creek,~~ particularly in the Bull River, and Cantwell drainages, especially in late winter when the animals are in a nutritional deficit. The magnitude of the impact would depend on snow depth. Die off would be greater as snow depth increases because displaced animals would have a more difficult time moving through the snow to forage and to get away from snowmachine use.

In addition, the State issues a limited number of permits for the Tier II hunt for the Nelchina Caribou herd, and local Cantwell residents must compete with residents statewide for the permits. Local residents rely on federal permits to hunt caribou in the Cantwell area. Under this alternative, non-subsistence snowmachine use would continue to increase and would either displace caribou from the Windy Creek, Bull River, and Cantwell Creek drainages or it would prevent caribou from going there altogether. If caribou do not travel onto these federal lands, subsistence hunters from Cantwell would not have an opportunity to hunt them. This opportunity would be lost for as long as the caribou remain on lands outside the national park.

Kantishna

Under this alternative, the Kantishna area would be designated as Management Area ~~AB~~, allowing for ~~high~~ medium disturbance to natural sounds and an encounter rate of up to ~~five~~ two parties per day, including ~~two parties of six people~~ one large party per day. ~~Up~~ A trail system would be formalized and ~~to~~ five designated campsites would be created in conjunction with the summer Corridor areas in the Kantishna Hills. ~~There could be up to~~ 10 encounters per day on the Corridors and trails. Increased recreational use in the Kantishna area, particularly on Corridors and trails, could negatively affect subsistence hunters who rely on this area for subsistence purposes. During the peak summer season there are approximately 300 overnight visitors to the Kantishna area. Increasing numbers of visitors on trails could necessitate an expansion of the firearms discharge closure to protect public safety in Kantishna. The decision to extend the closure would be evaluated in a separate public process. If the closure were extended, it would have adverse impacts on moose hunters in the Upper and Lower Moose Creek drainages, ~~Eldorado~~, and Skyline Drive area by severely restricting opportunities to hunt moose in those areas because they would not be permitted to use firearms.

Minchumina

~~Year-round recreational corridors would be designated in the northwest part of the park (Muddy/Kantishna Rivers).~~ A summer season Corridor would be designated along the Muddy and Kantishna Rivers, inviting-allowing more additional use along these corridors ~~these rivers~~ and potentially increasing user conflicts and the risk of theft and vandalism at subsistence cabins ~~along these corridors~~. Lake Minchumina area residents mentioned concerns about the impacts of increasing non-subsistence uses during public scoping (see also letter from Collins, 3/3/01).

There are at least five usable subsistence cabins along the Muddy and Kantishna Rivers and many others scattered throughout the preserve. This has been an issue of concern raised by the Subsistence Resource Commission because theft and vandalism have been reported on lands adjacent to the park (Hollis Twitchell, pers. comm. 1/13/05).

Cumulative Effects

The following actions increase the potential for adverse impacts to subsistence:

- In the last five years, non-subsistence snowmachine use has expanded dramatically in and adjacent to the southeastern areas of the park, particularly in the area near Cantwell and Broad Pass. Along with increasing popularity for snowmachining have come dramatic improvements in snowmachine technology. Because of the increased reliability, power and flotation ability of the newer snowmachines, snowmachine users have been accessing more distant areas and operating in significantly steeper and higher terrain than in past years.

Open habitat, mountain slopes, and reasonably good snow deposition in the Broad Pass area have attracted increasing numbers of snowmachine users from areas of the state accessible to the Parks Highway. Typically, non-subsistence snowmachine groups tend to travel in larger numbers and spend more time traveling in basins and drainages.

Increases in types and levels of recreation interfere with subsistence activities. Visitors, especially those who travel via motorized means, may disturb wildlife and interfere with subsistence users who are hunting or scouting for subsistence resources. As popular places become crowded, it is expected that recreational use will disperse into more remote or infrequently used places. Potential restrictions to subsistence may occur if visitors frequent areas used for subsistence. Visitors, especially those who travel via motorized means, may disturb wildlife and interfere with subsistence users who are hunting or scouting for subsistence resources.

- New housing and commercial development has occurred in the Nenana Canyon north of the park entrance, the Yanert Valley east of the park, in the eastern part of the Stampede Road corridor, around Cantwell, and along Petersville Road. This

development has resulted in minor expansion of local road networks or improvements of existing roads. This development is likely to continue, creating increased access to the eastern and southern boundaries of the park. Increases in types and levels of recreation can interfere with subsistence activities.

- While brushing a trail from Nenana to Minchumina for snowmachine use is opposed by locals in Minchumina and Telida, there is a reasonable chance that it would happen in the future. This trail would provide easier access to the northwestern part of the park. Increased access means higher use levels and greater potential for impacts to subsistence resources and opportunities.
- Continued growth in commercial developments in Kantishna would attract more visitors to that area, thereby increasing the potential for conflicts between subsistence and non-subsistence users, or increasing the potential for restrictions or conditions on subsistence use in the Kantishna area.
- Concern for the safety of park visitors prompted the National Park Service to initiate a closure to the discharge of firearms in the Kantishna area. This developed area has a large number of summer visitors using the facilities and surrounding area to engage in outdoor activities that could put them at risk of a firearm-related injury. The restriction on the discharge of firearms applies on federal public lands within one mile of the Kantishna road right-of-way from the former Mount McKinley National Park boundary at mile 87.9 to the north end of the Kantishna airport. The firearm discharge restriction is in effect during summer when the Kantishna lodges are in operation. During the closure period, subsistence harvests utilizing other methods and means of harvest may still take place according to federal subsistence management regulations.
- Restrictions and conditions associated with travel on the park road affect subsistence access. Subsistence users are required to obtain a permit, adhere to camping requirements and food storage requirements, and other conditions associated with backcountry use in the Old Park. Park road restrictions and backcountry requirements do not prevent subsistence access; however, subsistence users must be cognizant of and adhere to this additional requirement.

The combined combination of these impact of these actions would be major actions would cause a major adverse impact to subsistence resources and opportunities in Cantwell where conflicts between recreation and subsistence already exist and are predicted to increase, moderate adverse impacts in Kantishna where a high level of recreation and infrastructure exists, and minor adverse impacts in Minchumina where low levels of visitation are expected due to its remote location. Implementing this alternative alone would have minor to moderate adverse impacts on subsistence resources and opportunities. There would be a major cumulative adverse impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major.

Conclusion

This alternative would have minor to moderate adverse impacts on subsistence resources and opportunities because it would result in increases in non-subsistence snowmachine use, especially in the Cantwell area, and generally higher levels of recreation use in subsistence areas, incompatible activities, primarily on trails and corridors in the Cantwell, Kantishna, and Minchumina areas. These activities, including use of snowmachines, both of which would create unfavorable conditions for subsistence wildlife populations and increase conflicts between recreational and subsistence users. The severity of the impact from this alternative would be mitigated by restricting high intensity uses to narrow trails and corridors, and the impact would certainly be minor if increased use levels do not result in additional firearm closures in Kantishna or the Corridor designation does not increase use along the Muddy and Kantishna Rivers. There would still be a cumulative major adverse impact of this alternative plus the aforementioned past, present, and reasonably foreseeable actions would be major. The level of impacts to subsistence resources anticipated from this alternative would not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are essential to the integrity of the park.

CULTURAL RESOURCES

Cultural resources at Denali include archaeological resources, ethnographic resources, cultural landscapes, and historic structures. While there is some potential for impacts to any of these resources from plan actions, the archaeological resources and historic structures are most at risk while impacts to the other categories are anticipated to be negligible in all alternatives and were dismissed from further analysis (see chapter 1).

METHODOLOGY

The potential for increased pressure on cultural sites increases as the number of visitors increases. Impacts from visitor use can include modification, defacement, displacement, or removal of objects from cultural sites. Management actions to manage visitor use could also result in adverse impacts (for example, disturbing sites during trail construction). However, without site-specific information it is difficult to determine impacts. When specific actions are taken within any alternative further analysis will be required to comply with the requirements of Section 106 of the National Historic Preservation Act (NHPA) in accordance with the Advisory Council on Historic Preservation's regulations implementing Section 106 (36 CFR Part 800, "Protection of Historic Properties").

IMPACTS OF THE MODIFIED PREFERRED ALTERNATIVE

Actions proposed under this alternative would result in increased pressure on cultural resources because of the likelihood of increased visitation to cultural resource sites in the backcountry.

~~Snowmobile~~ There would be dispersed snowmachine use under Alternative 4 would allow dispersed use allowed throughout the park additions and preserve and on established winter corridors. ~~Snowmobile~~ Snowmachine use would continue to increase and cultural sites would be more prone to increased visitation throughout the winter months. Under this alternative, the Kantishna area would be designated as Management Area ~~AB~~, allowing for an encounter rate of up to ~~five~~ two parties per day, including ~~two~~ one party of more than six people. A portion of the Kantishna Hills, including the Stampede Mine (a site determined to be eligible for the National Register of Historic Places), would be designated Management Area B, allowing for an encounter rate of up to ~~two~~ two parties per day. This area would include the Stampede Mine site, which is one of very few antimony mines to have operated in the state. Cultural resources at this site are therefore unique, and any damage or loss would be significant. Several historic sites in the Kantishna Hills could experience an increase in visitation because of increased recreational use, although this risk could be mitigated by routing trails away from sensitive sites. ~~Year-round recreational corridors would be designated in the northwest part of the park (Muddy/Kantishna Rivers) and the southwest (Yentna and Tokositna Rivers).~~ Summer season recreational corridors would be designated along the

Muddy/Kantishna Rivers and the lower Tokositna River, inviting more use along these corridors and potentially increasing the pressure on cultural resources along these rivers. Potential adverse impacts are those described in the Methodology section.

Because the increased recreation use would facilitate or encourage more people to visit areas where cultural resources exist, the potential exists for increased pressure on those resources, particularly in the backcountry.

Cumulative Effects

Adverse impacts on cultural resources could be expected from land development in the Kantishna Hills and increases in regional recreational activities. As outlined in the analysis, the preferred alternative would result in increased pressure on cultural resources. This would not add to overall effects from other past, present, and reasonably foreseeable future actions.

Conclusion

Actions proposed under the preferred alternative could result in minor to major adverse impacts on cultural resources because of the likelihood of increased visitation to cultural resource sites in the backcountry, although determining specific impacts would require site-specific information. This would be the case throughout the life of the plan.

The level of impacts to cultural resources anticipated from this alternative would not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the integrity of the park.

SOCIOECONOMICS

The first part of this section provides a literature review of the types of impacts that can result from the various visitor and administrative activities that could occur in the park and preserve. The second part is an analysis of the impacts likely to occur under ~~each~~ the modified preferred alternative.

GENERAL IMPACTS BASED ON LITERATURE REVIEW

Impacts can be analyzed in terms of direct and indirect effects on social and economic values. Values of the social environment mainly include quality of life in the Denali region, which usually includes factors such as the ability to lead a rural lifestyle, availability of schools, libraries, and other basic community amenities, and personal safety (particularly a low incidence of crime). Economic values include direct and indirect economic benefits or losses to local communities, business and employment opportunities, ecosystem services, and less tangible values such as existence value. These values are defined and further explained in the following sections.

Economic Values of Denali National Park and Preserve

Visitor use in Denali National Park and Preserve represents one part of the economic value of the park. Businesses in gateway communities near the park benefit from visitors' requiring food, lodging, and other services. Studies conducted in Alaska provide an indication of the economic value of these services. For example, Fletcher et al. (2000) estimated that current residents with snowmachines spent about \$297 per machine for gas for tow vehicles and machines and \$286 per household for lodging, meals, snacks, and beverages in 1999. Non-residents were estimated to have spent about \$154 per day for tow vehicle and snowmachine rental, and \$149 per person per day for lodging, food, and beverages—assuming a 5-day trip—in 1999.

The large expanse of protected land in Denali National Park and Preserve also provides other types of direct and indirect economic benefits. Costanza et al. (1997) and others have recently attempted calculating the economic value of ecosystem services performed by natural systems. Economic values have been assigned to ecosystem services such as nutrient cycling, water supply, climate regulation, erosion control and sediment retention, and many others in addition to commonly recognized values such as recreation. While no specific economic values have been assigned to Denali National Park and Preserve, such a measurement may be possible in the future as its value as a natural, intact, functioning sub-arctic ecosystem is fully assessed and quantified.

Another economic value of Denali National Park and Preserve that has not yet been measured is its value in amenities to the local communities. In analyzing counties in the western U.S. that are close to wilderness areas, Lorah (2000) found that the presence of wilderness is correlated with income, employment, and population growth. According to Power (1995), natural landscapes “often may generate more new jobs and income by

providing the natural resource amenities—water and air quality, recreational opportunities, scenic beauty and the fish and wildlife—that make the...[area] an attractive place to live, work, and do business.” In addition, Fausold and Lilieholm (1996) found that real estate prices increase around open space.

Existence and Use Values of Denali National Park and Preserve and the Wilderness Recreational Experience

The existence value of a park or protected area is often phrased as “just knowing it is there.” Colt (2001) estimated the economic importance of Alaska’s ecosystems and concluded that “the ‘existence value’ of Alaska’s undisturbed lands and waters is likely to become increasingly important in the future, as world population, education, and income continue to grow and ecosystems in other places continue to be degraded.”

A number of contingent valuation studies have been conducted over the last 20 years. The purpose of such studies is to determine and compare the socioeconomic values of active and passive use. Active use involves having a wilderness recreational experience by going to the place and setting foot within the boundaries. Passive use involves knowing that such a potential experience exists even if one elects not to participate in wilderness recreational activities (or plans to do so sometime in the future). The results of some of these studies provide a basis for understanding the socioeconomic values affected by different types of wilderness experiences.

Contingent valuation studies have shown that the average household would be willing to invest in passive, non-use of wilderness areas (Gilbert, Glass and More 1991; Barrick and Beazley 1990; Pope and Jones 1990; Walsh, Loomis, and Gillman 1984; Diamond et al. 1993, Kahneman and Knetsch 1992; Vincent et al. 1995; Bjornstad and Kahn 1996). This research indicates that U.S. citizens not only value the existence of wilderness areas because of their importance as a national resource, but also because of the value in having them available in the event that those citizens would like to participate in wilderness recreational activities in the future. In many cases, the passive use value makes up a substantial proportion of the total value (combined use and non-use values) that is placed on wilderness areas.

Impact Thresholds

The following thresholds were used to determine the magnitude of effects on the socioeconomic environment.

Negligible: Little or no noticeable change in economic activity, employment and income levels, or population migration or immigration.

Minor: Local (limited to one community and vicinity) changes in economic activity, employment and income levels, or population migration or immigration.

Moderate: Regional (involves two or more communities in an area) changes in overall economic activity, employment and income levels, or population migration or immigration.

Major: Widespread (may involve a substantial region of the State, such as Interior Alaska) changes in overall economic activity, employment and income levels, or population migration or immigration.

IMPACTS OF THE MODIFIED PREFERRED ALTERNATIVE

Economic Impacts

Summer Season

Under this alternative scenic air tour and air taxi operators would have a variety of options for reducing aircraft noise, only one of which would be rerouting tours to avoid sensitive areas in the park and preserve. Air tour companies could expect continued increases in visitor demand and continued growth in business income throughout the life of the plan.

Management actions proposed as part of this alternative would allow for scenic tour airplane landings throughout much of the south additions between the Kahiltna and Eldridge Glaciers ~~(including the Eldridge and Pika Glaciers when climbers are not present)~~. Based on data from 1999 through 2004, only two scenic air tour landings took place outside of this area. Businesses providing scenic flights could therefore be expected to experience steady growth in income from this activity during the near future and throughout the 20-year life of the plan. The high quality of the scenic air tour experience would result in high demand for the activity throughout the life of the plan. Examples of benefits to scenic air tour operators include decreasing advertising costs as “word of mouth” becomes adequate to market the activity and the competitive advantages realized by providers of quality scenic air tours over Denali as compared to operators elsewhere in the region.

Economic benefits—specifically for business operators serving backcountry users—from other summer backcountry activities such as hiking, camping, and mountaineering, would continue under this alternative. Steady increases in business could be expected over the next 20 years commensurate with increased numbers of visitors. Visitor capacity determinations and management action to protect the overall quality of the wilderness experience would benefit visitors participating in all activities; therefore, continued growth would be likely. Providers of services to these users would benefit from steadily increasing business for the life of the plan. Economic benefits to area communities from these types of park uses would tend to increase eventually because of the quality of the experience and the increasing numbers of users. A higher level of benefit would be likely in Talkeetna, a primary staging area for mountaineering activities.

Winter Season

Snowmachine use in the park additions and preserve would increase moderately under this alternative, especially ~~in the Bull River Unit southwest of Cantwell~~ between the Bull River and West Fork Chulitna River and along the upper and lower Tokositna River.

There would be a steady increase in overall numbers passing through Denali area communities. Businesses serving these users (lodges, hotels, restaurants, gas stations, and retail businesses) in the Denali area, especially at popular destinations such as Cantwell and Trapper Creek, would benefit from increased income throughout the life of the plan.

The benefits to retail activity and profits, employment, and income from other winter uses, such as skiing and dog mushing, would steadily increase throughout the life of the plan. This plan includes provisions to protect the quality of these experiences for growing numbers of users in the entrance area and for operating a visitor contact center south of Cantwell that could help in encouraging and directing this type of use. Benefits would be attributable to the increasing numbers of winter visitors and the likelihood of visitors spending more time in the park area, both of which can be expected if the variety and quality of recreational opportunities increase.

Population and Housing Impacts

Summer Season

The overall increasing recreational use and associated employment over the next several years in which the plan would be in effect would likely lead to some level of seasonal influx of people to provide the needed retail services, such as lodging, restaurants, gas stations, and retail stores. Increases in the recreational use levels and local seasonal population would likely result in the need for additional community public support services and facilities over the next several years. These impacts would increase eventually and would be attributable to increasing backcountry visitor use, as well as growth in overall park visitation.

Winter Season

The steady increases in winter recreational uses in the park and preserve would result in similar increases in employment opportunities, income, and population in communities near the park throughout the life of the plan. There would be a continued steady increase in demand for emergency services, such as responses to incidents involving injuries and the need for search and rescue. This would affect emergency service providers in area communities for the next several years by requiring continued increases in their capacity.

Other Economic Values

While providing for expanded opportunities for wilderness recreation, this alternative also emphasizes protecting the wilderness character of Denali National Park and Preserve over the long term. There would be similar protection of other economic values such as the value of ecosystem services provided by the park. Ecosystem services values accrue from an undisturbed, expansive subarctic ecosystem, so the park and preserve would have higher value with the managed recreational types and use levels under this alternative that prevent or minimize human impacts on the landscape.

Based on the above descriptions of impacts to the area economy, population and housing, and other economic values, overall impacts to economic values of the park and preserve would be minor in the short term (next several years), but moderate over the life of the plan.

Quality of Life

Summer Season

Increasing numbers of recreational users in the backcountry of Denali over the next several years would likely result in corresponding increases in traffic, demands for parking, and the generally higher level of human activity in gateway communities. Long-term effects could include increased population levels from the influx of people from elsewhere in Alaska and the United States, employment of non-local residents, and development of new businesses by non-local residents. This could reduce the overall rural quality of life for some area residents.

Winter Season

Minor changes are likely to occur in the quality of life for permanent residents near the park. Increased use of snowmachines in the area and the presence of increasing numbers of visitors from other areas could result in increased noise levels for local residents and current users, as well as signs of greater human presence from snowmachine tracks. This would likely result in a minor reduction in the rural and wilderness quality of life currently experienced by area residents over the life of the plan. It would also result in a slight decrease in the overall quality of the remote lifestyle valued by owners of second homes and recreational properties.

Another impact of expanding winter use would be increasing traffic in local communities, especially along the George Parks Highway and the Petersville Road. Residents of Cantwell, for example, have reported safety concerns with the increasing traffic along the Parks Highway through their community.

Existence and Use Values

Actions proposed under this alternative would protect both existence values and the types of recreational use values sought by visitors who desire extended experiences in remote locations. This would correspond with a high level of resource protection because of visitor capacity limits in the park additions and preserve. Existence values could increase eventually if the pristine condition of the park became a more rare and highly valued commodity. Use values for wilderness recreation in a remote setting, including motorized uses such as snowmachine touring, would increase throughout the life of the plan.

Cumulative Impacts

The steady increase in recreational uses up to visitor capacity limits under this alternative would be a moderate contributor to increases in overall economic activity, development, and employment in the Denali region. As stated in the Assumptions section at the

beginning of the Environmental Consequences chapter, the NPS expects an average annual increase of about 2% in overall visitation, including backcountry use, to Denali National Park and Preserve in the reasonably foreseeable future. Regional recreational uses would continue to increase, possibly at a faster rate than park visitor use; and at popular destinations outside the park boundary, the increasing levels of use could be significant. This would result in increased economic activity and employment. Development would likely continue along the Petersville Road, in Trapper Creek and Talkeetna, in the Healy area and on private inholdings and Native allotments, resulting in an increased need for housing and public services, as well as a greater loss in the current rural to wilderness quality of life in these areas. As a result, with backcountry uses under this alternative a moderate contributor, there would be moderate cumulative impacts from increased tourism and economic activity, employment, and population levels in communities and private lands near Denali National Park and Preserve and along the George Parks Highway.

Conclusion

Because of steady increases in a wide variety of recreational uses throughout the park and preserve, this alternative would result in moderate increases in income for many existing businesses throughout the life of the plan. There would be increasing opportunities for new businesses to be initiated as a result of anticipated growth in recreational use levels in the park. These changes would also lead to increased employment opportunities and income levels, commensurate with the levels of increases of recreational use, for concessionaires and other recreation-oriented businesses near Denali National Park and Preserve. The increase in economic activity would result in minor increases in population and the need for additional housing and public services.

Minor impacts to the rural quality of life in communities near the park and preserve could be expected over the life span of the plan. Existence values would be protected and could increase eventually, as would use values for most activities. A moderate increase in the value of ecosystem services possibly contributed by Denali National Park and Preserve could be expected throughout the life of the plan. Overall impacts on social and economic values from the management actions under this alternative would be minor over the short term (next several years) and moderate over the life of the plan.

RECREATIONAL OPPORTUNITY & VISITOR SAFETY

The actions presented in ~~the alternatives~~ the modified preferred alternative could affect the type, amount, and diversity of recreational opportunities in the Denali backcountry and the Denali region, and could affect visitor safety. “Recreational opportunities” include all the potential types of recreation that visitors might engage in while within the boundaries of Denali National Park and Preserve, but do not include subsistence activities.

METHODOLOGY

Recreational Opportunity

Recreational opportunities are defined by examining the management prescriptions under each alternative, including the following:

- The type of experience provided for through the allocation of management areas and accompanying standards;
- The type of access that is possible;
- The extent of facilities and services provided.

The opportunities are considered in light of the park’s legislative purposes. For the entire park and preserve, the relevant purposes include “preserve wilderness resource values and related recreational opportunities such as hiking, canoeing, fishing, and sport hunting.” For the park additions and preserve, ANILCA 202(3)(a) specifies as a purpose to “provide continued opportunities, including reasonable access, for mountain climbing, mountaineering, and other wilderness recreational activities.” The Old Park is a legislatively designated wilderness area, so its recreational purposes include those indicated by the Wilderness Act as discussed in chapter 1.

A useful framework for examining recreational opportunities at Denali is provided by the authors of *Wilderness Management* (Hendee and Dawson, 2002). They characterize various activities in wilderness areas by the degree to which the activities are “wilderness dependent,” identifying three categories that apply to recreational activities. They are presented here in increasing order of wilderness dependence:

- 1) Recreational activities that take place outdoors but that do not require wilderness conditions (for example, naturalness and solitude), such as playing catch or a competitive track meet.
- 2) Recreational activities that are enhanced by a wilderness setting but do not require it, such as fishing or observing wildlife.
- 3) Recreational activities that depend on wilderness conditions, such as experiencing solitude and isolation, observing natural ecological processes, or challenging oneself with wilderness travel.

In the Denali backcountry, activities that do not require wilderness conditions include such activities as racing or high-marking with snowmachines, which would fall under the first category of wilderness dependence; that is, not dependent at all and not appropriate at Denali given the park's statutory guidance. Sightseeing for the purpose primarily of witnessing scenic vistas or wildlife falls in the second category, scenic air tours are an example. These activities are appropriate in Denali's backcountry because the wilderness setting enhances them, but they do not require wilderness. The third category comprises those activities that are most consistent with Denali's statutory guidance, and are the most wilderness-dependent, such as the challenge of mounting a mountaineering or backpacking expedition in an area that has no roads or facilities, or seeking the solitude of deep winter on a dog mushing expedition.

Visitor Safety

Visitor safety is also a concern for the recreational experience at Denali. Chapter 3 provides details of past successes the National Park Service has had in addressing visitor safety issues, although additional ones are possible as visitor use increases. For example, in some locations, particularly on glaciers where there are high levels of visitation, drinking water quality could be affected primarily through biological hazards associated with human waste, and unburned vehicle fuel. The severity and causes of recreation-related water pollution problems are poorly known, although health hazards due to fecal contamination have been identified as a potential concern (Temple et al. 1982; Herman and Williams 1987; Cole et al. 1987). Inadequate disposal of human waste has been implicated in the spread of water-borne intestinal parasites (*Giardia* spp.), even in watersheds that receive little recreational use (Suk et al. 1987).

Impact Thresholds

- Negligible:** There would be little or no change in recreational opportunities or visitor safety.
- Minor:** There would be a change in recreational opportunities or visitor safety, however it would affect relatively few visitors, or would not affect any wilderness-dependent recreational activities.
- Moderate:** There would be substantial changes in recreational opportunities or visitor safety, however these changes would not affect the majority of visitors in a wilderness-dependent user group.
- Major:** There would be substantial changes in wilderness-dependent recreational activities or visitor safety that would affect opportunities for the majority of one or more user groups.

Impairment: Unique opportunities for wilderness-dependent recreational activities would cease to be available at Denali. Uniqueness refers only to uniqueness within Denali National Park and Preserve, and is determined by such characteristics as the type of activity, landscape setting, and ease of access.

IMPACTS OF THE MODIFIED PREFERRED ALTERNATIVE

Recreational Opportunity

This alternative would have a minor beneficial impact on recreational opportunities at Denali because it would allow for growth in a carefully managed set of appropriate backcountry activities to serve individuals who need more assistance with access, facilities, and services, while still protecting the recreational activities that are dependent upon Denali's wilderness resources and which the NPS is legislatively obligated to provide. Visitor safety would be improved by education associated with required registration for some common activities.

The application of management areas and accompanying standards throughout the park and preserve would assure the continuation of a spectrum of recreational opportunity at Denali, with an emphasis on providing continued opportunities for growth in all kinds of appropriate recreational activities.

Approximately ~~116%~~ of the park and preserve plus areas ~~along the park road~~ would accommodate those visitors that need additional facilities or assistance with access to wilderness recreational activities. Some areas along the park road in the Old Park and Kantishna would also have opportunities for some assisted activities, but at a low level of use. About ~~2940%~~ would serve those visitors seeking an experience similar to what is presently available along in the Denali Wilderness in terms of the amount of crowding and signs of human presence, and 5% would provide for high-use mountaineering areas. ~~Another 49% would preserve an opportunity to have a remote experience at Denali. About 11% would seek to preserve the experience of visitors who do not wish to encounter any other people during their exploration.~~

In the busy, accessible area between the Kahiltna and Eldridge Glaciers, management area designations would protect 5% as high use but low noise, providing an area where the climbing and mountaineering experience could avoid conflicts with other uses, such as scenic air tour traffic. However, there would be many popular climbing areas in the Ruth Amphitheater, Kahiltna Glacier, and Tokositna Glacier that would continue to have multiple uses; opportunities for climbers to have an undisturbed experience would diminish.

The standards proposed in the plan may reduce some future opportunities for recreation involving some forms of access. For example, standards that limit social trail development would make it difficult for the National Park Service to allow significant backcountry access by bicycle or pack animal, because either would quickly damage

vegetation and lead to social trail development in most parts of the national park and preserve, excepting harder surfaces such as gravel river bars. The standard could lead to prohibiting those activities in the future if such damage were to become likely.

Summer recreational access in the Old Park would require travel by foot from the park road, roads outside of park boundaries, or personal (non-commercial) airplane. Summer access in the remainder of the park and preserve would be facilitated by ongoing opportunities to use motorboats and airplanes, including commercial air taxis, to reach remote areas at established landing areas, glaciers, or lakes. No area would preserve places that would require lengthy overland travel to reach.

Winter recreational access would be facilitated by ongoing opportunities to use ski-equipped airplanes park wide and commercial air taxis in the park additions and preserve to reach remote areas. There would be an ongoing opportunity to use snowmachines for traditional activities in the park additions and preserve. If in the future the term “traditional activities” were defined to exclude ~~recreational non-consumptive use~~ activities as for the Old Park, such as utilizing a snowmachine ~~recreational use for those activities~~ would be prohibited by existing NPS regulation. The level of motorized access could be limited in the future if necessary to achieve management area standards.

The management of motorized access in this alternative would ~~protect~~ allow some adverse impacts to wilderness-dependent opportunities on the Eldridge Glacier and in Little Switzerland ~~and the Rampart Mountains~~. To a lesser degree, some opportunities for non-motorized winter use would be protected in the accessible park additions on the south side of the Alaska Range where snow conditions are more reliable, but only in ~~limited areas east of Cantwell Creek~~ the Bull River.

This alternative would allow the development of more guided opportunities than are presently available at Denali and expansion of some existing activities, although the constraints on these activities would be more carefully defined than at present. Guided day hiking in the Old Park would ~~be restricted to existing levels and locations~~ generally be restricted to the levels and locations where it occurs now; however, more than 20 miles of entrance area trails (some still to be constructed) would be opened to guided hiking. Scenic air tour landings – an appropriate but not wilderness-dependent activity – would be restricted to glaciers in Management Area A and designated landing areas on the Eldridge and Pika Glaciers, and constrained by natural sound disturbance standards, which would allow some growth but limit some locations where landings presently occur. Guided sport hunting opportunities would be enhanced by extending the two current guide areas across the entire southwest preserve, thereby creating larger guide areas that have a more viable opportunity for regular hunts.

There would also be the opportunity to offer additional types of guided activities, but these would be restricted only to the ~~Kantishna Hills, Dunkle Hills,~~ and southern glaciers and lowland areas designated as Management Area A, about ~~11~~ 16% of the park and preserve backcountry. In addition to the guided activities, there would be additional

opportunities for new and expanded educational programs throughout the park and preserve.

The addition of a formalized trail system in the Kantishna Hills would add the opportunity for visitors to hike in a more traditional format, providing an option for those uncomfortable with cross-country travel. However, the opportunity would be largely limited to those who have the ability to stay overnight at the western end of the park in the backcountry, at a campground, in a private lodge, or in the hostel provided for in the 1997 *Entrance Area and Road Corridor Development Concept Plan*. Designated campsites in the Kantishna Hills would also offer a different experience than is presently available which would appeal to some visitors who prefer to reduce uncertainty and difficulty in selecting a backcountry campsite.

~~The Wildhorse Creek trail would provide an additional trail-hiking opportunity and access option on the south side of the park. The other trails provided for in this alternative largely address resource damage and add little opportunity for backcountry travel.~~

Gaining public access to the 17(b) easement between Cantwell and the park boundary at Windy Creek would benefit recreational opportunities by providing an additional point of access to the park that is road accessible.

Visitor Safety

Experience has demonstrated that the park's mountaineering program can safely accommodate the present number of climbers attempting to climb Mount McKinley. NPS mountaineering rangers believe that current levels of education and rescue services could safely accommodate up to 1,500 visitors.

It is likely that some overnight camping and winter day-use in the southern park additions would trigger registration requirements in the near future. These requirements would enable better visitor education, enhancing visitor safety through better knowledge of common backcountry hazards such as bears, rivers, glaciers, avalanches, and potentially hazardous conflicts with other visitors (e.g., people camping too close to landing areas on glaciers). These new requirements, if implemented, would apply to a substantial but unknown number of visitors who presently do not register. There are presently about 500 overnight mountaineering users per year on south side glaciers that voluntarily register.

Continued increases in climbers attempting Mount McKinley and neighboring peaks would lead to an increase in unconfined human waste and the potential for degrading water quality as ice melts on the Kahiltna, Pika, Ruth, and Eldridge Glaciers. Although most human waste deposition typically is on ice, snow, or rocky soils well away from surface or groundwater movement, the long-term impacts of this practice are unknown. Contamination of water resources could cause health problems for climbers and other visitors in areas drained by these glaciers.

In this management scenario, all of the park's popular climbing areas (West Buttress, Kahiltna Base Camp, and the Ruth Glacier) are zoned as Management Area A, C, Portals or Special Use Areas, which allow for higher levels of encounters with people and with evidence of modern human use. Evidence of human waste should still be low in these areas because NPS staff would continue to educate climbers about waste disposal, conduct regular patrols on the West Buttress, and encourage climbers to use Clean Mountain Cans to dispose of their human waste, which have been shown in the past to reduce waste problems on the West Buttress.

Under this alternative, limiting the number of climbers on Mount McKinley to 1,500 per season would allow use levels to increase by over 15%. Removal of human waste from the park would be required on the West Buttress Route on Mount McKinley ~~at and~~ above the 14,000-foot camp, and at campsites within one-half mile of air taxi landing locations on glaciers. If new registration requirements were imposed in the popular mountaineering areas, they would allow NPS staff to further educate visitors about proper disposal of human waste in other glaciated areas that receive considerable use. These actions would be expected to mitigate most of the potential negative impacts that increased use, and subsequently increased human waste, could have on drinking water quality and human health in these high use areas. Realistically, not all impacts would be mitigated, and impacts to water quality could persist for several years.

Cumulative Impacts

The National Park Service has generally allowed the growth of backcountry recreational activities and encouraged it by authorizing guided activities such as dog sled tours, scenic air tour landings and air taxi services, guided day hiking, and guided mountaineering. Some activities have been constrained to protect park resources by prohibiting snowmachine access to the Old Park in 2000 and imposing quotas on overnight backcountry use in 1976. However, these actions have served to preserve the diversity of recreational opportunity at Denali, particularly for wilderness-dependent activities. Meanwhile, increasing snowmachine access to the southern park additions and the expansion of aircraft overflights on the south side of the Alaska Range and the eastern portion of the Old Park associated with increasing scenic air tour traffic have had an adverse impact on wilderness-dependent activities.

The actions in this alternative would mitigate the adverse impacts of actions originating outside of NPS control and preserve the diversity of recreational opportunity in the face of further changes in recreation demand. Overall, the actions in this alternative combined with these other actions would have a minor beneficial impact on the recreational opportunities in the Denali backcountry. The actions proposed would be responsible for a substantial portion of the benefit, although the previous efforts to limit overnight use and restrict snowmachine access also play an important role.

Conclusion

This alternative would have a minor beneficial impact on recreational opportunities at Denali because it would allow for a carefully managed set of appropriate backcountry activities to serve individuals who need more assistance with access, facilities, and services, while still protecting the recreational activities that are dependent upon Denali's wilderness resources and which the NPS is legislatively obligated to provide. However, there would be limited opportunities for some wilderness-dependent activities to expand in accessible areas. Visitor safety would be improved by education associated with required registration for some common activities, while adverse impacts to water quality would be minimized.

The level of impacts to recreational opportunities anticipated from this alternative would not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are essential to the integrity of the park.

PARK OPERATIONS AND MANAGEMENT

This section addresses impacts to park operations and management, including needs for staffing, equipment, and facilities within all divisions of the National Park Service at Denali.

METHODOLOGY

Previous management actions in Denali National Park and Preserve and management actions in other units of the national park system (such as those from Rocky Mountain National Park, Zion National Park, Mount Rainier National Park, and Shenandoah National Park) were used to determine impacts to park management from each of the alternatives. For example, examination of operations of Denali's current backcountry quota system indicates the National Park Service can expect impacts of an expanded registration system to be similar to those that have occurred during the last 25 years that the current quota system has been in place.

IMPACTS OF THE MODIFIED PREFERRED ALTERNATIVE

The National Park Service would follow through with its commitment to conduct ecological monitoring and research to implement the plan. Additional park staff and funding will be needed to carry out the baseline studies, research, and subsequent monitoring that is an inherent requirement of the successful implementation of the adaptive management approach that is promoted by this plan. The complexity of monitoring to determine if desired resource conditions are being met is greater than simply regulating a carrying capacity limit such as the number of permits.

Approximately a 25% increase in research and monitoring staffing and funding would ~~need be needed~~ to implement the level of research and monitoring that is required by this alternative. The allowance for motorized access and higher levels of scenic air tour activity would increase the need for the research and monitoring information on natural soundscapes, wildlife disturbance, vegetation damage, and visitor capacity. Four new permanent positions and four new seasonal positions in these disciplines would be ~~needed to help meet the obligations in this alternative for adaptive management~~ required to implement plan provisions. Four new seasonal positions to assist in monitoring implementation would be required. Funding sufficient to conduct concurrent contracted research studies on soundscape, vegetation, wildlife, and sociological topics would be required given that the use levels and types of use allowed by this alternative would require more immediate information.

The continuation of recreational snowmachine, airplane, and motorboat use throughout the park and preserve additions as well as continued use of airplanes, motorboats, ~~stock~~ pack animals, and bicycles in the Old Park implies major new management responsibilities and operational impacts ~~that are not a consequence of either Alternatives~~

~~2 or 3.~~ A well-staffed and funded backcountry management operation along with a research and resource management program that is specifically assigned to address backcountry visitor use related issues would be necessary to implement the actions of this alternative and the resource protection strategies described in this plan.

Higher levels of use in the backcountry, particularly during the winter from snowmachine use, would require 400 flight hours of aerial patrols to enforce regulations and gather resource monitoring information. The infrastructure and staffing exist to absorb this increase with only minor impacts on park operations, but increased funding would be required to pay for flight time.

Three additional permanent positions and 12 additional seasonal positions distributed between visitor contact stations at Park Headquarters, Broad Pass, Talkeetna, and perhaps along the Petersville Road or at Trapper Creek would eventually be necessary to provide visitor information and registration services. An additional supervisory Park Ranger would be needed to oversee a backcountry district that would include four backcountry law-enforcement field Rangers. Two additional staff, one permanent, and one seasonal would be necessary to increase the winter patrol coverage capabilities of the park kennels operation. The establishment of this comprehensive program, which is essential to the accomplishment of the adaptive management strategy inherent in this plan, would be a major impact on park operations.

An important long-term beneficial impact on park operations is the plan's documentation and formalization of standards, limits, guidance, and policies for actions in the backcountry. Park administration and personnel change eventually, and the proposed plan would provide for continuity and consistency of management, decreasing variability and uncertainty about appropriate activities, including commercial activities, in the backcountry.

The addition of one permanent park planner or management assistant would be required to coordinate the implementation of proposals in this alternative such as working with air taxi and scenic air tour operators to reduce aircraft noise, accomplishing required updates to the plan, and carrying out the evaluation of information from required monitoring. The position would also lead the planning for any subsequent adaptive management actions that may be necessary. An additional 50% of a permanent position would be required to work with concessions management to develop provisions for future commercial use authorizations and monitor the increased level of commercial activity.

The National Park Service would maintain the same level of administrative presence on Mount McKinley and the overall impacts to park operations and management would be negligible over 5-10 years of plan implementation.

An additional seasonal trail crew on the north side of the park would be required to construct and maintain trails that are included within this plan. Given the current scale of the trails program, this would be a minor impact.

Maintenance of new facilities such as the new contact station in the Cantwell/Broad Pass area and structures to support winter use in the park headquarters area would require additional operating funds for contract services as well as the addition of one permanent and one seasonal employee.

The additional staff required to implement the plan would exceed ~~the existing~~ administrative capabilities and would therefore trigger additional expenses for office space, administrative staff, vehicles, and parking ~~of existing administrative and facility infrastructure~~ and create related impacts to other aspects of park operations, and as a result represent a major impact to park operations overall.

Cumulative Effects

Past, present, and reasonably foreseeable future actions, such as the private and commercial development in and near the park and regional increases in recreational uses will require additional time and effort from park management for the next 20 years. Impacts to park management would be major because these projects will have serious ramifications on the visitor experience and condition of the park. Existing staff are fully utilized with existing projects; therefore, new duties would require new staff. To work effectively on these and other projects, more funding would be necessary and/or existing staff would have to shift priorities.

Conclusion

Despite the fact that there would be increases in park staff and funding to manage increased use and additional facilities, and that proactive management would negate the need for a reactive (and thus, a more costly and effort-intensive) approach to management, major impacts to park operations and management would still occur in several important aspects of park operations during 5-10 years of plan implementation. These changes would be of a degree that cannot be absorbed within existing infrastructure. The required staffing and funding are of a magnitude that would trigger the need for major secondary responses in support services such as administration, (particularly human resources), support facilities and equipment such as office space and vehicles, and as well as facility maintenance activities. Overall, there would ~~still~~ be major impacts to park operations as a consequence of this alternative. Without the staffing and funding increases described above, it would not be possible to prevent impairment of park resource values given the use increases called for by this alternative.

SUSTAINABILITY

MODIFIED PREFERRED ALTERNATIVE

Relationship Between Short-Term Uses and Long-Term Productivity

The dispersed motorized access that would continue and grow in the Dunkle Hills/Broad Pass and lowland areas around the bases of the Kahiltna, Tokositna, and Ruth Glaciers could compromise the ability of the park to sustain wildlife resources, which could be displaced. Close to Cantwell, these wildlife resources are also subsistence resources. The same displacement could occur in other areas of the park and preserve, particularly ~~Kantishna~~, if snowmachine access became popular in the future. In addition, these areas could decline in their ability to provide wilderness recreational opportunities because of the high levels of motorized equipment and noise that would make it difficult for visitors to find solitude.

Irretrievable or Irreversible Commitments of Resources

There would be no irreversible or irretrievable commitments of resources made under this alternative.

Unavoidable Adverse Environmental Impacts

There would be unavoidable adverse environmental impacts to natural soundscape and wilderness resources in areas where motorized access would be common, such the southern glaciers between the Kanikula/upper Kahiltna and Ruth glaciers because of airplane access and the Corridors in the Broad Pass/Dunkle Hills and Tokositna River areas. There would also be damage to vegetation and ice-rich permafrost soils in ~~Corridors and other~~ areas where snowmachines commonly travel. All of these impacts would be mitigated by the standards provided by management areas.



CHAPTER 5: CONSULTATION AND COORDINATION

The National Park Service consulted and coordinated with numerous agencies, organizations, and interested persons in addressing the proposed Backcountry Management Plan and General Management Plan amendment for Denali National Park and Preserve. Individual members of the public and other interested agencies and organizations have had the opportunity to shape this plan from the definition of issues and concerns through the initial development of alternatives, *Draft EIS*, and *Revised Draft EIS*. The following is a brief overview of the extent of public and agency involvement.

Public Involvement

Public Scoping

The National Park Service held scoping meetings within the park and the regional office during fall 1998 and spring 1999. A Notice of Intent (NOI) to prepare an environmental impact statement was published in the *Federal Register* on August 31, 1999. After publishing the Notice of Intent, the National Park Service hosted public scoping meetings in Anchorage, Fairbanks, Talkeetna/Trapper Creek, and McKinley Village to define issues and impact topics to address in the plan. Approximately 150 people attended these meetings and an additional 65 written comments were received.

Newsletter

As a result of these scoping efforts, the NPS issued in January 2001 the Special Winter 2001 Edition of the *Denali Dispatch* (Volume 6, Issue #4) to about 2,000 addresses on the park mailing list. This document described the primary activities and a range of alternatives to be evaluated in the environmental impact statement. (Recipients included those receiving the *Draft Backcountry Management Plan and EIS*—see list at the end of this section).

Open Houses – Alternatives Development

The National Park Service held open house meetings in Anchorage, Fairbanks, Talkeetna/Trapper Creek, Cantwell, and Healy during the first two weeks of February 2001 to help fine-tune the alternatives and impact topics.

Open Houses – Draft Plan and EIS Review

Upon release of the *Draft Backcountry Management Plan and EIS* in February 2003, the National Park Service held a series of informational workshops in Anchorage, Wasilla, Talkeetna/Trapper Creek, Cantwell, Healy, and Fairbanks to explain the plan so members of the public would be better equipped to respond in public comment.

Public Comment on Draft Plan

The public comment period on the draft plan was open for 75 days from February 25 to May 7, 2003, and then extended at public request to May 30, 2003. In April, public hearings were held in Anchorage, Wasilla, Talkeetna/Trapper Creek, Cantwell, Healy,

and Fairbanks. The National Park Service received 9,370 comments. These comments are summarized and responses to substantive comments provided in Appendix A of the *Revised Draft EIS*. As a result of the comments, the National Park Service decided to revise the draft plan and solicit additional public comment before publishing a final plan.

Public Comment on Revised Draft Plan

A Notice of Availability for the *Revised Draft EIS* was published in the Federal Register on April 26, 2005, and public comment was accepted through July 15, 2005. National Park Service staff received 15,198 comments. See Chapter 6 for a summary and analysis of these comments and the NPS responses to substantive comments. Public hearings on the *Revised Draft EIS* were held during June, 2005, in Anchorage, Talkeetna/Trapper Creek, Cantwell, Healy, and Fairbanks.

Consultation With Federal Agencies

U.S. Fish and Wildlife Service

Section 7 of the Endangered Species Act, as amended, prohibits federal agencies such as the National Park Service from implementing any action that is likely to jeopardize the continued existence of a federally protected (i.e., endangered, threatened) species. Further, the act requires that the National Park Service consult with the U.S. Fish and Wildlife Service on any action it authorizes, funds, or executes that could potentially affect a protected species or its designated critical habitat.

To help meet its responsibilities under the act, the National Park Service has consulted with the U.S. Fish and Wildlife Service to identify those listed plant and animal species that may inhabit the backcountry area. On July 17, 2000, Superintendent Stephen P. Martin sent a letter to Ann Rappaport, Ecological Services and Endangered Species, requesting information on federally endangered or threatened plant and animal species in Denali National Park and Preserve for the backcountry management plan. On July 27, 2000, Arthur E. Davenport, Endangered Species Biologist, indicated in his letter that the U. S. Fish and Wildlife Service had no endangered or threatened plant and animal species occurring within the area of the proposed new backcountry management plan for the park. Copies of the correspondence were included in full in Appendix D of the original *Draft Backcountry Management Plan and EIS* (NPS 2003d).

In addition to this communication, National Park Service planning staff met with counterparts in the Alaska Region of the U.S. Fish and Wildlife Service on May 13, 2004, to discuss the draft plan.

Bureau of Land Management

The National Park Service held discussions with Bureau of Land Management staff, Glenallen Field Office, and submitted written comments regarding the East Alaska

Resource Management Plan (EARMP). The NPS comments sought coordination between the EARMP and the backcountry management plan on regional recreation opportunities, and particularly for combining efforts on the proposed visitor contact station in the Broad Pass/Cantwell area.

Denali Subsistence Resources Commission

Several presentations have been made to the Denali Subsistence Resources Commission, which has maintained an active interest in the plan because of potential conflicts between subsistence users and recreational users in the park additions and preserve. Presentations have occurred at the April and October meetings in 2001, February meeting in 2002, March meeting in 2004, and June meeting in 2005. The Commission passed formal motions regarding both the original *Draft EIS* and the *Revised Draft EIS*. The motions and commission discussion have consistently called for recognizing a subsistence priority over recreational uses in areas where subsistence use occurs, zoning the southern park additions between Cantwell and the Bull River to protect subsistence activities, and providing more guidance on the resolution of conflicts between subsistence and recreational use. The complete motions regarding the *Revised Draft EIS* and the NPS responses appear in the following chapter of this document, Chapter 6: Public Comments and Response.

Consultation with State and Local Governments

State Of Alaska

The planning team shared a draft copy of the affected environment section of the *Draft EIS* with the State of Alaska during winter 2000-2001 with a 60-day comment period. The Office of the Governor in Anchorage sent a comment letter to the park on April 20, 2001, along with an edited electronic version of the affected environment section. The planning team incorporated most of the state's suggestions. Suggested comments that were not incorporated into the draft plan were discussed with the Division of Governmental Coordination during fall 2001. The National Park Service provided the State of Alaska with a copy of the internal review draft backcountry management plan on January 18, 2002. The State provided verbal comments in a meeting on July 26, 2002.

During the comment period for the draft plan, the State submitted extensive comments that are published in appendix A of the *Revised Draft EIS* with responses. The National Park Service involved the State extensively in the process of crafting the revised draft plan, holding 10 meetings with representatives of the Office of the Governor, Department of Natural Resources, and Department of Fish and Game between December, 2003, and December, 2004. The State also participated in internal review of the revised draft plan during November 2004. The planning team met with the State during July and September 2005 to discuss the State's comments on the *Revised Draft EIS* and potential NPS responses to them, and the State was included in the internal review of the *Final EIS* during late November and early December 2005.

Alaska State Historic Preservation Office and the Western Office of the Advisory Council on Historic Preservation

The National Park Service has consulted with the Alaska State Historic Preservation Office and the Western Office of the Advisory Council on Historic Preservation since initiating this project. An advance copy of the document was provided for their review. A copy of the *Draft Backcountry Management Plan and EIS* was sent to both of these offices in order to initiate and plan for coordination survey, eligibility, effect, and mitigation of possible cultural resources in the proposed project areas early in the planning process. Copies of correspondence were included in Appendix D of the original *Draft Backcountry Management Plan* (NPS 2003d). All implementation actions that could affect historic properties as defined under the National Historic Preservation Act and the 1995 Nationwide Programmatic Agreement will be evaluated through consultation with the state historic preservation officer. These actions include, but are not limited to, proposed changes to historic buildings or districts and ground-disturbing activities.

Consultation with Native Tribal Governments

The National Park Service sent copies of the draft plan and letters requesting government-to-government consultation to six affected Native tribal governments. A meeting with the Nenana Native Council was held in summer of 2003 to discuss the backcountry management plan and other issues. These Native tribal governments were also provided with a copy of the *Revised Draft EIS* in April 2005.

Additional Consultation

In addition to the publicized public involvement opportunities and consultation with public agencies, the National Park Service has sought comments and responded to requests for meetings, discussion, or informational presentations with a wide variety of organizations throughout the process of preparing the original and revised draft of the plan. In winter and spring 2002, the National Park Service held collaborative planning workshops in Anchorage and Talkeetna to discuss alternatives and issues associated with climbing and mountaineering, snowmachine use, and airplane use. Park staff frequently met with snowmachine groups, air taxi operators, environmental groups, inholders, subsistence users, and members of the travel and tourism industry to provide updates and solicit ideas and information.

List of Agencies, Organizations, and Businesses to Whom Copies of the *Revised Draft Backcountry Management Plan/Environmental Impact Statement* Were Sent

ALASKA CONGRESSIONAL DELEGATION

Congressman Don Young
Senator Lisa Murkowski
Senator Ted Stevens

FEDERAL DEPARTMENTS, AGENCIES, AND OFFICES

Advisory Council on Historic Preservation
Alaska Public Lands Information Center, Anchorage
Alaska Public Lands Information Center, Fairbanks
Department of the Interior
 All Alaska National Parks
 Assistant to the Secretary for Alaska
 Bureau of Land Management
 National Park Service, Alaska Region
 National Park Service, Washington office
 U.S. Fish and Wildlife Service
Environmental Protection Agency
Federal Highway Administration

NATIVE ORGANIZATIONS AND CORPORATIONS

Ahtna Development Corporation
Alaska Village Initiatives
Cook Inlet Region, Inc.
Doyon, Limited
Subsistence Resource Commissions
Native Village of Cantwell
Native Village of Tanana
Nenana Native Council
Nikolai Edzeno' Village Council
Tanana Chiefs Conference

STATE OF ALASKA

Governor Frank Murkowski
Alaska Department of Fish and Game
Alaska Department of Natural Resources
Alaska Department of Transportation and Public Facilities
Alaska Railroad Corporation
Alaska State Historic Preservation Office

Alaska State Parks
State Representative David Guttenberg
State Senator Ralph Seekins
State Senator Gene Therriault

LOCAL GOVERNMENT AGENCIES

Anchorage Convention and Visitors Bureau
City of Anderson
City of Fairbanks
City of Talkeetna
Denali Borough
Fairbanks Chamber of Commerce
Fairbanks Convention and Visitors Bureau
Fairbanks North Star Borough
Greater Palmer Chamber of Commerce
Greater Fairbanks Chamber of Commerce
Healy Chamber of Commerce
Matanuska-Susitna Borough
Municipality of Anchorage
Talkeetna Chamber of Commerce
Talkeetna Community Council
Trapper Creek Community Council
Village of Nenana

ORGANIZATIONS

Access Fund
Alaska Airmens Association
Alaska Alpine Club
Alaska Aviation Safety Foundation
Alaska Center for the Environment
Alaska Conservation Alliance
Alaska Conservation Foundation
Alaska Environmental Lobby
Alaska Lands Act Coordinating Committee
Alaska Miners Association
Alaska Natural Heritage Program
Alaska Natural History Association
Alaska Outdoor Council
Alaska Professional Hunters Association
Alaska Public Interest Research Group
Alaska Quiet Rights Coalition
Alaska State Snowmobile Association
Alaska Tourism Industry Association
Alaska Wilderness Recreation & Tourism Association

Alaska Wildlife Alliance
Alaska Women of the Wilderness
American Alpine Club
American Alpine Institute
American Wilderness Alliance
Anchorage Audubon Society
Anchorage Snowmobile Club
Blue Ribbon Coalition
Commonwealth North
Denali Citizens Council
Denali Foundation
Denali Visitors Association
Earth First, Ltd.
Earth Justice Legal Defense Fund
Fairbanks Snow Travelers
Greenpeace USA
Lake Minchumina Advisory Committee
Mat-Su State Park Citizen's Advisory Board
McCarthy Area Council
Middle Nenana River Advisory Committee
Mountaineers Club of Alaska
National Audubon Society
National Outdoor Leadership School
National Parks and Conservation Association
National Wildlife Federation
Northern Alaska Environmental Center
Panguingue Creek Homeowners Association
Resource Development Council for Alaska, Inc.
Seaplane Pilots Association
Sierra Club, Alaska Chapter
Sierra Club, Alaska Field Office
Southeast Alaska Conservation Council
Susitna Valley Association
Talkeetna Environmental Center
Talkeetna Historical Society
The Conservation Fund
The Nature Conservancy of Alaska
The Wilderness Society
Trustees for Alaska
Wilderness Watch
Wildlife Federation of Alaska

BUSINESSES

The *Revised Draft EIS* was sent to over 200 businesses, which fall into one of the following categories:

- Accommodations
- Climbing services
- Dog sled tour and freighters
- Engineering and consulting firms
- Fishing services
- Flying services
- Hiking services
- Hunting services
- Inholders associations
- Leisure services
- Mining companies
- Mountaineering services
- Raft and kayak services
- Restaurants, local
- Ski tour services
- Transportation services, automobile
- Wilderness schools

EDUCATIONAL INSTITUTIONS

- Alaska Pacific University
- Denali Institute
- Fairbanks Noel Wein Library
- Loussac Public Library
- Prescott College
- Talkeetna Public Library
- Tri-Valley Community Library
- University of Alaska-Anchorage
- University of Alaska-Fairbanks

MEDIA

- Alaska Snowrider
- Airmen's Magazine
- All Public Radio and Television Stations
- Alaska Geographic
- Alaska Magazine
- Anchorage Daily News
- Denali Summer Times
- Fairbanks Daily News Miner
- The Frontiersman



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>	13
<i>Non-Form Comments</i>	469
<i>Form Letters</i>	14,691
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

Letter	Page #
Bergt, Steven	313
Brease, Barbara	315
Colianni, Ruth	317
Collins, Mike and Julie	319
Dean, Frederick	322
Haber, Gordon	335
Morgan, James	341
Paragi, Tom	342
Strassenburgh, John	345
Tejas, Vern	347
Turnbull, Kim	349
Zeithammer, Robert	353
Zerker, Keenan	355

Comments



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

July 15, 2005

Reply To
Attn Of: ETPA-088

Ref: 99-077-NPS

Paul Anderson, Superintendent
Denali National Park and Preserve
Post Office Box 9
Denali Park, AK 99755

Dear Mr. Anderson:

The U.S. Environmental Protection Agency (EPA) has reviewed the Revised Draft Environmental Impact Statement (RDEIS) for the **Denali National Park and Preserve Backcountry Management Plan** (CEQ#20050165), Denali Park, Alaska. The review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. This section of the Clean Air Act directs EPA to specifically review and comment in writing on the environmental impacts associated with all major federal actions. Our review considers not only the impact to the environment but also the adequacy of the NEPA document itself.

EPA commends the National Park Service (NPS) for revising the Management Plan in response to public comments on the original draft EIS published in February 2003. The primary change in the RDEIS is from a management approach based on zoning to one based on desired future social and resource conditions in discrete management areas.

The RDEIS proposes five action alternatives that fall along a spectrum. Under Alternative 1 (or no action), the NPS would continue current management as guided by the 1986 General Management and 1997 Backcountry Management plans, which would result in increased visitor use and motorized access with no new services to meet increased levels of use. As a result of this, there would be moderate to major impacts to various park resources, particularly natural soundscape and wilderness resources. Alternative 2 would limit recreation opportunities to those that depend on wilderness and non-motorized forms of access. This option would limit the range of recreational opportunities but would provide moderate to major benefits for wilderness and natural soundscape resources. Alternative 3 would provide for a diversity of wilderness recreational activities and limited motorized access, resulting in moderate benefits to the diversity of recreational opportunities and to both wilderness and natural soundscape resources. Minor impacts to wildlife, subsistence and vegetation resources would be anticipated.

Comments

Alternative 4, the preferred alternative, would provide for growth in a variety of recreational activities for visitors needing services, assistance, or short time-commitments while still providing some opportunities for wilderness-dependent activities. Actions in this alternative would result in moderate adverse impacts to permafrost soils, wildlife, vegetation and subsistence resources. Because this alternative provides little mitigation for past actions, there would likely be cumulative major adverse impacts to resources such as wilderness and natural soundscapes. In Alternative 5, the proposal is to allow substantial increases in use levels and motorized access parkwide, with particular concentrations to the south side of the Alaska Range. These actions would cause major impacts to vegetation, subsistence resources, and opportunities, and moderate to major impacts to wildlife, wilderness, and natural soundscapes. Without mitigation plans for past actions, alternative 5 would also result in adverse impacts to many park resources, wilderness and soundscapes in particular.

In our comments on the original draft EIS in 2003, EPA expressed concerns about the potential impact of snowmobile use on the environment in Denali National Park because of indications that snowmobile use in the park was likely to increase rapidly and because such use would have the greatest potential to cause significant environmental impacts to park resources compared with other proposed uses. EPA remains concerned that increased snowmobile usage will adversely affect wildlife, soils, vegetation, wetlands, water and air quality, and natural soundscapes. While EPA understands and supports the need to provide access for subsistence uses, we believe that snowmobile access to backcountry for recreational use may put natural resources that are important for Denali's intended uses at risk.

We are also concerned about risks and uncertainties associated with the proposed adaptive management approach. The standards and monitoring as described in the RDEIS may not be sufficient to protect important park resources. EPA recommends that the final EIS (FEIS) include more robust, quantitative standards that measure impacts to resources, a more complete description of the monitoring plan, and a description of how the monitoring information will be used to modify land management.

In addition, we are concerned about trail construction and development in the park because of potential impacts to vegetation, soils, and wildlife, as well as their ability to attract heavy use of the park, which may include off-road vehicles.

Based on these concerns and insufficient information available in the RDEIS, we have assigned a rating of EC-2 (Environmental Concerns, Insufficient Information) to the RDEIS. A summary of our comments will be published in the Federal Register. A copy of the EPA rating system used in conducting our review is enclosed for your reference.

We appreciate the opportunity to review the RDEIS. If you would like to discuss issues related to our review, please contact Mr. Theogene Mbabaliye at (206) 553-6322 or mbabaliye.theogene@epa.gov

Sincerely,

Response to Comments

Comments

Christine B. Reichgott, Manager
NEPA Review Unit

cc:
EPA Alaska Operations Office

Response to Comments

Comments

EPA Comments on the Revised Denali National Park and Preserve Backcountry Management Plan and Draft EIS

Adaptive Management approach

The NPS indicates that the proposed backcountry management plan would be implemented using adaptive management. EPA supports the use of this strategy when clear threshold values for descriptions and standards to guide future decisions are available. Ideally, the proposed plan would not only identify the thresholds, but also would discuss and identify management alternatives and mitigation that would be implemented should a threshold value be exceeded. Many of the proposed descriptions and standards for measuring the degree of impacts (i.e., low, medium, and high) are qualitative and therefore have the potential to be subjective. The RDEIS describes monitoring that relies primarily on surveys of backcountry visitors. Also, the descriptions and standards provided in the RDEIS are primarily related to impacts on the human park experience; appropriate descriptions and standards are needed for impacts to wildlife and other natural resources. EPA is concerned that significant impacts to backcountry natural resources could occur and remain undetected until damage is done. EPA recommends that the final EIS (FEIS) include more robust, quantitative standards that measure impacts to wildlife and other important natural resources. We also recommend that the FEIS include a description of the monitoring plan, how it will be funded, and how the monitoring information will be used to modify land management.

Snowmobile access and policies

EPA understands the challenges of managing areas for multiple uses. The challenge is further complicated when multiple laws and definitions apply. There appears to be some possible confusion or conflict in how the RDEIS describes definitions and policies related to regulations that affect snowmobile usage at Denali. For example, in response to comments, the RDEIS states that in the absence of a definition for “traditional activities”, there would be no immediate distinction among the activities for which snowmachines are used for access. However, the definition given in a 2000 Final Rule does define “traditional activities.” That rule states that no snowmachine use within the Old Park is authorized (section 1110(a) of 43 CFR 36.11(C)). Of importance to this proposed plan is the statement that, “NPS intends to define traditional activities and apply such definitions to other park areas, including the remainder of Denali National Park and Preserve, in subsequent processes, such as future rulemakings to implement backcountry management plans for some of the national parks in Alaska.” At that time, NPS further concluded that any snowmachine use in the Old Park would be detrimental to the resource values of the area, and that even only a few snowmachines would cause detriment to the special resource values of the Old Park, wilderness and wildlife values in particular. It would seem that these conclusions would also apply to the park additions and preserve, especially if some of these lands are to retain the features that would qualify them to be designated as wilderness areas in the future.

Easements and land exchanges

The RDEIS states that implementation of the proposed plan will require easements on private lands and a land exchange with the state of Alaska. EPA recommends the final EIS

Response to Comments

EPA-1

The final backcountry management plan (BCMP) adds additional monitoring requirements for major wildlife species. These requirements would trigger management action in response to statistically significant changes in wildlife populations, demographics, or distribution if those changes could be correlated to changes in visitor use or differences in management area regimes. Otherwise, the plan provides very robust quantifiable standards for changes in 10 indicator categories. Although characterized in Table 2-1 as high, medium, or low levels of impact, Tables 2-2 to 2-9 further explain these characterizations with specific standards. Indicators for trail and campsite disturbance, natural sound disturbance, and wildlife disturbance provide meaningful direction for monitoring the impacts of recreational use on key park natural resources. Visitor surveys for other indicators would be scientifically constructed and implemented and should provide valid information for monitoring impacts on wilderness resource values. Because this is a General Management Plan document, it focuses on general goal-setting and management strategy. It provides sufficient guidance from which to develop an implementation-level monitoring plan.

EPA-2

The Environmental Assessment for the 2000 regulation that prohibited snowmachine use in the Old Park was careful to distinguish the unique resources of the Old Park. The resources of the park additions and preserve are similar to but not identical to Old Park resources. The standards expressed in the BCMP provide appropriate protection for the resources of the 1980 additions while still allowing for special uses authorized by ANILCA. The National Park Service does not believe the level of use allowed for would preclude the designation of these areas as wilderness.

1

2

Comments

include information about the status of easement agreements and land acquisition, and show resulting alterations in park boundary locations

Tribal consultations

The RDEIS describes the process used to inform Native tribal governments and invite government-to-government consultation. However, we did not see any information that described the outcome of consultation nor how the RDEIS addressed any concerns that were raised. Information in the RDEIS indicates that throughout the park, there are many cultural sites with resources (archeological and historic) associated with native tribes. It is possible that the proposed management plan could have impacts on native cultures, their places, economy, and other resources. EPA recommends that the FEIS include information about the process that was used to consult with native tribal governments and outcome of such consultation.

Trail construction and improvement

The RDEIS states that park management promotes a “trail-less” philosophy at Denali. However, the RDEIS states that there are several unplanned social and constructed trails (p. 200). EPA understands that trails are constructed as needed to protect park resources. Since user-created trails generally follow corridors with more moderate, convenient terrain, proliferation and increased usage of trails could result in significant impacts to park resources, critical areas such as riparian zones and wetlands, and cultural sites. Trails typically attract greater numbers of people and off-road vehicles than off-trail areas. As described in the RDEIS, trails can have direct, indirect, and cumulative impacts on a variety of park resources. Trails have direct impacts on vegetation and soil due to trampling, compaction, and erosion. Depending on the species, heavily used trails can cause significant impacts on wildlife habitat, behavior, and nutrition. Various recreational activities using trails are also known to cause wildlife displacement. There is also evidence that trails and pack animals may serve as sources and vectors for the spread of invasive weeds. Where trails and camp sites occur, for example, vegetation could be lost or changed in structure. EPA recommends that impacts be avoided and minimized in NPS’s programs for trail planning, siting, management, and monitoring.

Response to Comments

EPA-3

Government-to-government consultation with Native tribal governments did not result in any substantive comments on the original or revised draft BCMPs. The Denali Subsistence Resources Commission, which has many Native members, did provide comments that influenced the modified preferred alternative. Please see the responses to the motions of the Denali Subsistence Resources Commission.

EPA-4

Construction of trails would include the planning, siting, management, and monitoring components recommended by EPA to minimize impacts. In all cases, the new trails would replace existing social trails where most of the adverse impacts stated in the comment have already occurred, so the constructed trails would mitigate some aspects of past overuse.

Comments

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM

FRANK H MURKOWSKI
GOVERNOR

550 W. 7th AVENUE, SUITE 1660
ANCHORAGE, ALASKA 99501
PH: (907) 265-7470 / FAX: (907) 265-3981
Saliv_Gibert@dnr.state.ak.us

July 14, 2005

Paul Anderson, Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali Park, Alaska 99755

Dear Mr. Anderson:

The State of Alaska reviewed the April 2005 Denali National Park and Preserve Revised Draft Backcountry Management Plan, General Management Plan Amendment, and Environmental Impact Statement. The following comments represent the consolidated views of the State's resource agencies.

GENERAL COMMENTS

The State commends the National Park Service for issuing a revised draft plan. The revised document offers far more clarity than the initial draft plan and gives readers a much better sense of what to expect from the various alternatives and how implementation will unfold. Even though we have remaining important concerns, we nonetheless recognize the numerous substantial revisions that more closely conform to the Alaska National Interest Lands Conservation Act (ANILCA) and implementing regulations. We note in particular the effort to develop standards and indicators that facilitate management transparency and improved public involvement. Some of these standards and indicators need refinement; but we support the overall effort to develop and evolve this methodology.

While the State does not normally take positions on specific alternatives and cannot endorse the Preferred Alternative in its entirety, this alternative as a whole is preferable to alternatives 2 and 3 in attempting to balance many competing uses in the Denali backcountry. We recommend against selection of Alternatives 2 or 3, which are far more restrictive than what Congress intended. Also, regardless of alternative, we continue to oppose the eminent or future extension of the restrictive "Old Park" definition of "traditional" to the ANILCA park and preserve additions. This definition would remove Section 1110(a) protections from a variety of long-standing uses and activities that pre-date designation.

WILDERNESS MANAGEMENT

The State strongly objects to any proposals that extend formal Wilderness Act management requirements to areas outside designated Wilderness. The State recognizes that protecting

Response to Comments

Comments

wilderness values is an important management objective of the plan. ANILCA includes recognition of wilderness values generally, and Section 202(3) explicitly includes wilderness recreational activities as a specific purpose of Denali Park and Preserve. Nonetheless, only the original, pre-ANILCA portion of the Park is congressionally designated Wilderness. Therefore, only the Old Park should be managed in accordance with the Wilderness Act, as amended by ANILCA.

Under Section 1317(c) of ANILCA, the wilderness suitability review undertaken after the passage of ANILCA shall not "be construed as affecting the administration of any unit of the National Park System or National Wildlife Refuges System in accordance with this Act or other applicable provisions of law unless and until Congress provides otherwise by taking action on any Presidential recommendation made pursuant to subsection (b) of this section." In the legislative history of ANILCA, Senate Energy Report 96-413 provides additional insight into this provision:

The Committee Amendment directs the Secretary of the Interior to conduct a wilderness review of those lands within National Parks, Monuments, and Wildlife Refuges not designated as Wilderness by this Act. This review shall be made pursuant to the Wilderness Act and completed within 5 years.

The Committee expects that the affected units will be managed and administered in accordance with the provisions of this Act and applicable law during the study period.

Therefore, Congress did not intend for the Service to manage these areas as designated Wilderness until Congress acts to designate.

The Denali Backcountry Plan states on page 21 that the Service will manage the park additions and preserve "to maintain the wilderness character and values of the land under other authorities until designation recommendations have been proposed and Congress has acted on these proposals." This intent appears to stem from the Service's national 2001 Management Policies regarding management of suitable and proposed wilderness. This policy states the "National Park Service will take no action that would diminish the wilderness suitability of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed. Until that time, management decisions pertaining to lands qualifying as wilderness will be made in expectation of eventual wilderness designation."¹ When these national policies were in draft form, the State commented by seeking greater recognition of the statutory ANILCA exceptions.² Given that more than half of the National Park System is located in Alaska, we further requested consideration of a separate policy for Alaska. Most of our comments were not addressed in the Final Policies, so discrepancies with ANILCA remain.

We also understand the National Park Service is revising the national policies. We again request the Service revisit these fundamental questions about the management of parklands outside designated wilderness in Alaska. In the meantime, for purposes of the Denali Backcountry Plan,

¹ 2001 NPS Management Policies Section 6.3.1 (cited on page 21 of the Backcountry Plan)

² State letter to Loren Fraser, National Park Service, Washington D.C. March 20, 2000

Response to Comments

SoA-1

The Department of Interior Solicitor provided the National Park Service with guidance regarding ANILCA 1317(c), which concluded that this clause neither required nor prohibited the NPS from managing lands outside of designated wilderness to maintain wilderness character and values. Quoting from letter by David Watts, Assistant Solicitor, to Vernon Wiggins, Co-chairman of the Alaska Land Use Council, on May 21, 1986:

"Accordingly, it is clear from the statute and its legislative history that the Department...is not required to manage these areas as wilderness areas prior to an Act by Congress designating them as such. This does not preclude, however, the Fish and Wildlife Service and National Park Service from managing them to maintain the wilderness character and values of the land under other Park and Refuge authorities until Congress has acted."

The quotes from the Senate Committee report do not reflect on this fundamental interpretation. The National Park Service believes that Denali's management history, public expectations, and ANILCA purposes, combined with management policies, all point to the conclusion that much of the park additions and preserve should be managed to maintain wilderness resource values and opportunities for wilderness recreation.

Comments

2 we request recognition that in cases where the national policies conflict with ANILCA, the statute prevails. We also seek satisfactory resolution of the following additional concerns.

3 **Minimum Requirement/Minimum Tool: Administrative Activities**
The common management proposal to implement the “*minimum requirement/minimum tool*” analysis throughout the “*entire park and preserve backcountry*” (page 58) is the foremost manifestation of our concern about wilderness management. This Wilderness Act process even extends to those lands that were not recommended for wilderness designation in 1988. As proposed, this process applies to all administrative and scientific activities, including management actions conducted by the State of Alaska. We do not object to the Service voluntarily applying this process to its own management activities. However, the State strongly objects to being required to follow this process outside designated wilderness as it could impact the State’s ability to fulfill its authorities and responsibilities, particularly for management of fish and wildlife. The latter state responsibilities are specifically acknowledged and protected in Section 1314 of ANILCA.

The relationship of the Alaska Department of Fish and Game (ADF&G) and the National Park Service is spelled out in the Master Memorandum of Understanding (MMOU). Service concerns with state management activities affecting fish and wildlife should be addressed within the context of this agreement, not through a separate, potentially burdensome, authorization process. As noted above, the State recognizes the presence of wilderness resources and values and is prepared to consider these and other park purposes through normal implementation of the MMOU. The MMOU calls for “notification” to the Service of state activities. In practice, ADF&G staff members are expected to contact the park *before* the activity takes place to insure opportunity for Service input.

4 Other state management activities (e.g. fire management) are similarly covered by various government-to-government agreements and processes, which provide sufficient opportunity for consultation to insure that park purposes and values are recognized without this additional requirement. Our concerns apply to academic and private researchers as well. For these entities, we request the Service address protection of all park resources and values through existing research permit requirements, thus relieving the Service from separately imposing the “minimum requirement/minimum tool” for wilderness values on non-Service entities.

5 **Minimum Requirement/Minimum Tool: Commercial Services**
We also object to applying the minimum requirement/minimum tool analysis to commercial service providers as proposed on page 56. Under the new Concessions law, those operating under commercial use authorizations as well as concession operations will undergo a rigorous process to be allowed to operate in any National Park Service administered area. As with non-Service administrative activities, we request that the Service use existing commercial service authorization mechanisms to address the resources and values identified in this plan.

Broader Recognition of Recreational Activities
The specific purposes of Denali Park and Preserve as listed in ANILCA Section 202(3) include “to provide continued opportunities, including reasonable access, for mountain climbing, mountaineering, and other wilderness recreational activities.” [Emphasis added.] Yet the

Response to Comments

SoA-2

The BCMP clarifies in Chapter 1 the proper hierarchy of statutes and policies.

SoA-3

The text of the preferred alternative has been revised to clarify that the minimum requirement instruction applies to administrative actions of the National Park Service. Management actions of the State of Alaska Department of Fish and Game within the boundaries of Denali National Park and Preserve should follow the intent and process of the Master Memorandum of Understanding, which includes timely consultation before management actions are scheduled so that both agencies can agree on methodologies that minimize adverse impacts to park resources and values.

SoA-4

The minimum requirement/minimum tool test is incorporated into the existing research permit process, so the State of Alaska’s concern is already addressed for present and future research permit applications from academic and private researchers.

SoA-5

The intent of this section of the BCMP was to explain how criteria implementing provisions of concessions law and NPS Management Policies were derived for Denali. The reference to minimum requirement has been removed from this section.

Comments

Backcountry Plan sometimes appears to focus primarily on protection of “wilderness values” to the apparent exclusion of other important purposes and uses such as wildlife viewing and recreation. We have identified several locations where this issue can be addressed:

6 **Page ii**, Purpose and Need, first sentence: We request revision to insure the plan does not inadvertently imply that protecting physical wilderness characteristics is more important than providing for the recreational activities listed in the purposes of the unit.

7 **Page 3**, last paragraph, second sentence: Consistent with the above comments, we request revision to recognize the important historical human uses of the unit.

8 **Page 57**, first bullet, third point: “They provide education relevant to preservation of wildlife, wilderness, and other resources and values.”

APPLICABLE LAWS, REGULATIONS AND POLICIES

In this portion of Chapter 1, we request recognition or clarification of the following additional applicable authorities:

9 **Page 19**, Off-Road Vehicle Access: Also note that 36 CFR Part 13.46 allows the use of snowmobiles, motorboats, dog teams, and other means of surface transportation traditionally employed by local rural residents for subsistence. Other means of surface transportation may include the use of off-road vehicles for subsistence.

10 **Page 20**, Closures and Public Use Limits, 36 CFR § 1.5: Revise to clarify that NPS regulations at 36 CFR Part 13.30 supercede the closure regulations at 36 CFR Part 1.5 for Alaskan park units.

11 **Pages 21-22**, Wilderness Management: Per our general comments, please clarify that when the national policies conflict with ANILCA, the statute prevails.

12 **Pages 22-23**, Guided Activities and Commercial Services. Recognize that ANILCA Section 1307 allows the continuation of existing visitor services and provides a preference for selecting visitor services, except guided sport fishing and hunting.

13 **Page 23**, Facilities. Also note that ANILCA Sections 1306 and 1310 allow administrative sites and facilities for administrative, navigation, or research purposes.

14 **Page 25**, Easement and Boundary Changes. Also note ANILCA Sections 103(b) and 1302 (including the 1302 amendment), address easement and boundary changes for most conservation system units in Alaska, including units managed by the National Park Service.

OTHER PAGE SPECIFIC COMMENTS

Page 27, Off-Road Vehicle Use. We disagree with the assertion that off-road vehicles (ORVs) are not authorized for subsistence purposes under Section 811 of ANILCA because they were not traditionally employed for subsistence purposes. Under Service

Response to Comments

SoA-6

The plan objectives have been clarified to include “protect and provide opportunities for wilderness recreational activities in the backcountry, including reasonable access.”

SoA-7

The Purpose and Need section of the Revised Draft plan contains many references to the important human uses of the unit. See, for example, p.7 and p.8 under Park Purpose, p.10 under Park Significance, and p.11 under Objectives, all of which are reiterated in the *Final EIS*. The statement on p.3 adequately reflects the point that NPS wanted to make regarding one of the key guiding principles for development of the *Revised Draft EIS*.

SoA-8

The language in this section is intended to provide the minimum condition necessary to meet the criteria specified in policy. While the National Park Service agrees that commercially guided activities should also seek to provide education about the broad array of park resources and values, the justification for having the activity in the backcountry is dependent upon education related specifically to wilderness resource values in keeping with the emphasis of the plan.

SoA-9

Language was added to chapter 1 as requested.

SoA-10

The NPS does not agree with this assertion. A memorandum from Deputy Regional Solicitor Dennis J. Hopewell on October 18, 2002, supported the NPS interpretation that 36 CFR 13.30 closure regulations apply only where specifically referenced in Part 13. The text in this section is consistent with that interpretation.

SoA-11

The general discussion of the hierarchy of statutes, regulation, and policy on pp.11-12 of the *Revised Draft EIS*, which is reiterated in the *Final EIS*, provides clarification for the public on this point.

Comments

15 regulations at 36 CFR 13.46, such subsistence use of ORVs is allowed unless closed through the regulatory process detailed in 13.46(a) through 13.46(c). Denali National Park and Preserve is currently evaluating eligible subsistence users traditional use of off-road vehicles in Cantwell and within the park in the Cantwell area. A finding that ORVs were traditionally employed is pending. It is therefore inaccurate for the Service to state that off-road vehicles are not authorized in the park or preserve.

16 **Page 42, Table 2-1: Management Area Descriptions, Backcountry Hiker Management Area.** Based on inquiries, we understand that the “No camping” provision in this proposal is intended to prevent people from camping directly on specified trails, rather than a nondescript area closure within the vicinity of the trails. In order for this provision to be meaningful to the public and enforceable by the Service, both the trail locations and portions affected need to be specifically defined. We do not support any closures that are not properly identified.

17 **Page 46, Table 2-5: Natural Sound Disturbance.** The text within the table and the notes that accompany this table fail to address the issue of noise generated from legal access methods provided through law and regulation. This text leads the reader to assume that motorized noise is automatically inappropriate within Denali backcountry, a conclusion that would not be consistent with ANILCA’s protections of motorized access. We request explanation in the table or “Notes” to recognize that legal motorized access and its associated sounds are not inherently inconsistent with management of the Denali backcountry. We also request inclusion of some descriptive narrative that better conveys a recognizable sound intensity represented by various decibel levels. For example, it would be helpful to associate decibel level ranges with the “three-part scale” referenced on page 137. In addition, the presentation would be more neutral if the Service replaced the term “noise” with “sound.”

18 **Page 47, Table 2-6: Encounters with People.** We recognize the Service’s efforts to better define encounter rates, and we appreciate Service recognition that the standards may need to be refined after 5 years. In the meantime we question whether the quantified encounter rates reasonably reflect the accompanying qualitative descriptions. In Corridors rated “Very High,” for example, encountering 10 or fewer parties a day does not seem to match up with “*may always be in sight and sound of other parties.*” At the other end of the spectrum in the “Very Low” encounter rate category, it seems unwise to state that “*Visitors can expect no other parties in these areas....*” A more realistic statement might be: “*Visitors are unlikely to encounter parties in these areas....*” Our concerns about encounter rates were first articulated in our letter of April 12, 2004. These standards are not yet adequate to support regulatory closures or restrictions under Section 1110(a).

Page 50, Access, General Guidance. We are aware that the Service has compiled a substantial amount of information for this plan related to historical activities and access. Based on our understanding of the methodology, we are concerned that the data may be limited in scope and incomplete. The State has long held that a documented understanding of pre-ANILCA public use is essential to properly identify and manage access for “traditional activities” under Section 1110(a) and “means of surface transportation traditionally employed” under Section 811. When the original GMPs were completed by the Service and subsequently approved by the Alaska Land Use Council, it was understood by all state and federal participants that the Service did not

Response to Comments

SoA-12

Language was added to chapter 1 as requested.

SoA-13

Language was added to chapter 1 as requested.

SoA-14

Language was added to chapter 1 as requested.

SoA-15

At the time the *Revised Draft EIS* was written, the text was correct. A new finding that concluded ORVs were traditionally employed in parts of the park additions near Cantwell has since been published. Information in chapter 1 has been updated accordingly.

SoA-16

Management area designations reference specific trails identified in chapter 3, which include both a width and a length. The management area designation applies only to the trail surface itself.

SoA-17

It is important to recognize that allowed uses can and do cause adverse impacts to park resources. Much as hiking can cause trampling and erosion to plants and soils, the use of motorized equipment for access to traditional activities causes noise impacts to the natural sound environment. It is important for the BCMP to acknowledge these adverse impacts and seek to minimize them while allowing for legal use of the area. Congress recognized this fact by providing for reasonable regulation to “protect the natural and other values of conservation system units,” and went further to provide for closure to special access if it would be detrimental to the resource values of the unit (ANILCA Section 1110(a)).

SoA-18

Clarifications have been made in Table 2-6 to address these concerns.

Comments

have a sufficient knowledge base to include the access plan required by Section 1301(b)(4). Therefore, National Park Service Regional Director Boyd Evison made a commitment to conduct comprehensive studies of pre-ANILCA access and activities in cooperation with the State. The ADF&G, with cooperation from the Service, completed a successful study of pre-ANILCA activities for the Wrangell-St. Elias National Park and Preserve. We request an opportunity to review the objectives and methodology of the current data gathering effort. The Backcountry Plan is essentially designed to conclude the required Section 1301(b)(4) element of the original GMP, and therefore must be based on complete and accurate information.

19 **Page 50, Access, General Guidance, second paragraph.** We recommend separating the excellent “tools” discussion from the general access section. While all of the tools have some possible application to access, a number of them also apply to other subjects (e.g. human waste disposal) unrelated to access.

20 **Pages 51-52, Registration and Permit Systems.** We request clarification that mandatory registration and public use permit requirements can only be implemented through regulation. We do not support mandatory registration if the sole purpose is to gather public use data – especially in the park additions – when less burdensome methods are available through commercial use providers, survey cards, and/or periodic sampling studies. We support use of less restrictive measures to meet identified standards before implementing registration or permit systems.

21 **Page 54, Group Size.** We request the plan clarify that rulemaking pursuant to ANILCA Section 1110(a) is necessary to implement group size limits for non-commercial activities.

22 **Pages 59-60, Adaptive Management.** To explain the implementation of “ongoing monitoring” and adaptive management, we recommend the Service develop a step-down comprehensive monitoring plan to supplement tables 2-2 through 2-9 in Chapter 2. The monitoring plan should be made available for public review. In the meantime, we request the final backcountry plan outline the general purpose and content of the monitoring plan, including:

- a statement of objectives for both overall and site specific monitoring,
- what characteristics the Service intends to monitor,
- sampling strategies, techniques or procedures for data analysis, and
- criteria used to develop conclusions.

23 **Page 60, Adaptive Management, second paragraph, fourth bullet.** We recommend this bullet be revised so that there is no misunderstanding that a process is required to implement such closures. Any closures under the annual backcountry operational management plan must also undergo the closure procedures under 43 CFR Part 36.11 for ANILCA Section 1110(a) access, 36 CFR Part 13.46 for subsistence access, and 36 CFR Part 13.30 for other activities.

Pages 61-62 and page 66, Access under Alternatives 2 and 3. We strongly object to extending application of the Old Denali Park definition of “traditional activities” (36 CFR Part 13.63(h)) to any ANILCA designated unit or addition. We also object to any efforts to legislatively exempt the “Old Park” from the access provisions of ANILCA Section 1110(a) – as proposed under Alternative 3. See also first comment for page 50.

Response to Comments

SoA-19

The National Park Service agrees that many of the access management tools could be used to address topics that are not directly access-related. However, listing the tools was not necessary in order for the National Park Service to employ any of the authorities or methods described. The list is important in this context only as an articulation of the NPS access management strategy for the Denali backcountry, which is a central point of concern for the plan. Separating the “tools” discussion would require some changes in the list and dilute the desired emphasis on access. Listing the tools in this section in no way compromises the ability of the National Park Service to use the tools appropriately in other contexts.

SoA-20

The modified preferred alternative includes an Implementation section that identifies required regulations, including regulations for any new registration or permit requirements.

SoA-21

Table 2-13 has been added to address implementation requirements, including the identification of necessary regulatory changes.

SoA-22

A Monitoring Plan that includes the elements listed will be an important component of plan implementation. The National Park Service is committed to involving the public in development of the monitoring plan. It is one item identified specifically for consideration by the Backcountry Implementation Citizens Advisory Committee, which will serve as the chartered Federal Advisory Committee Act (FACA) group to advise the National Park Service on various aspects of the plan implementation.

SoA-23

Appropriate regulations and procedures for closures are thoroughly addressed in chapter 1. Text in the adaptive management section indicates regulation could be required for implementing portions of the backcountry operational management plan.

Comments

24 **Pages 72 and 76, Access, Alternatives 4 and 5.** Unlike Alternatives 2 and 3, there is no language stating that “access will be managed using the tools identified under Actions Common to All Action Alternatives.” Since the tools are listed as common to all alternatives, we assume this omission is an oversight in the text that can easily be clarified in the final plan. We also request clarification that any future access closures proposed in response to the changes in desired future conditions will be implemented through separate rulemaking.

Page 72, Access, second paragraph. We do not see a sufficient need for broadly applied registration requirements for overnight use in the park additions and winter day use east of the Kahiltna Glacier. Compliance would be burdensome and other, less restrictive methods are available for data gathering.

25 **Pages 80-81, Shelters and cabins.** In the section Alternatives Considered But Rejected, we take issue with several aspects of this discussion. First, the majority of the planning area is outside designated wilderness; thus the reference to “within wilderness areas” is misleading at best, and furthers our concern that the park is attempting to manage the entire backcountry the same as designated wilderness. Second, contrary to the text, ANILCA Section 1303(3) does provide for the construction of cabins for public use on all parklands, regardless of their status as designated wilderness, even though we recognize the park is not required to do so. Furthermore, the purpose is not limited to public safety. Third, the discussion does not recognize the State’s original request in our previous comments for consideration of such public use cabins.

26 **Page 82, Summary Table of Alternatives.** The text describing the size of the areas in Alternatives 3 and 4 have been noted incorrectly. Alternative 3 should read “...the areas would be the minimum necessary to provide these experiences based on present demand...” and Alternative 4 should read “The areas would be of sufficient size to accommodate anticipated growth in the next 20 years....”

Page 105, Map of proposed land exchange. The State conceptually supports consideration of the proposed land exchange involving the boundary between the state and parklands in the vicinity of the Tokositna and Coffee rivers. It is not a high priority for the State in light of other exchange activity elsewhere in the state; therefore we would need substantial Service assistance to facilitate the public involvement and other statutory requirements associated with implementing any land exchange.

27 **Chapter 3**
Pages 121-132, Wildlife. Section 1314 of ANILCA confirms that the State of Alaska retains authority to manage fish and wildlife on public lands. Clarification of this role and a commitment to cooperate in related matters is addressed in the Master Memorandum of Understanding between the Service and ADF&G. We request that the respective roles of the Service and State, and a Service commitment to cooperation, be fully recognized in the text. We also recommend the Service provide a copy of the Master Memorandum of Understanding as an appendix in the final plan.

Response to Comments

SoA-24

The suggested clarification was made in the modified preferred alternative.

SoA-25

The State is correct that ANILCA Section 1303(3) provides the authority for the construction of new cabins if “the use is necessary to reasonably accommodate subsistence uses or is otherwise authorized by law.” Section 1315(d) limits that authority, however, in designated wilderness to cabins “necessary for the protection of the public health and safety.” As stated on page 441 of the *Revised Draft EIS*, public scoping did not identify this as an issue needing resolution in the plan. With regard to the 1980 ANILCA park and preserve additions, the National Park Service would be conservative about new cabin construction due to the purposes for the additions stated in Titles I and II of ANILCA, that include, among others: to preserve wilderness resource values and to provide opportunities for wilderness recreation activities. The National Park Service has evaluated over 99% of the 1980 additions as being suitable for wilderness designation and has the responsibility to preserve the congressional option to so designate. To help provide for wilderness recreation activities, the National Park Service agreed to partner with the State to construct six cabins along the southern border of Denali National Park, and would further encourage the State and other entities to take advantage of any similar perceived need adjacent to other parklands.

SoA-26

This typographic error was corrected in the tables in the *Final EIS*.

SoA-27

The Master Memorandum of Understanding clarifies the roles of the State of Alaska and NPS in fish and wildlife management. The Master Memorandum was included in the 1986 *General Management Plan (GMP)*, which remains current for topics not addressed in this limited GMP amendment.

Comments

28
Page 133, Natural Soundscapes, paragraph 5. Consistent with our comments on page 46, we are concerned by reference to the statement in Director’s Order #47 that “noise is generally defined as an unwanted or undesired sound, often unpleasant in quality, intensity or repetition.” We recognize that maintaining natural sound is an important goal for many visitors, but some human caused sound is necessary to conduct legally allowed activities. To address this concern, we request the next sentence in this paragraph be revised as follows: “Noise may often be the byproduct of desirable or legally authorized activities or machines, but it still subject to management to protect park resources.”

Page 140, Backcountry Visitor Use, second paragraph. The State opposes extension of the backcountry unit and quota system outside the Old Park. The basis for the original system does not fit with the realities of backcountry use in the ANILCA additions and the access protections under Sections 811 and 1110(a).

Page 141, Wilderness Suitability and Proposal. Consistent with our general comments above about wilderness, we disagree that lands suitable for wilderness designation must be managed “as wilderness” under the 2001 NPS Management Policies.

29
Pages 143-146, Subsistence. This is a well-written and informative section and responds to most of our recommendations on the previous draft plan in 2003. However, we note several minor errors in the text. First, we recommend the Service amend the final sentence on page 144 to show that Telida was also among the communities covered in the Stokes 1984 publication. The ADF&G, Division of Subsistence also conducted research in other Parks Highway communities, both north and south of the park. We recommend citing the following study, which described subsistence activities in Lake Minchumina as of the mid-1970s in what was then the proposed north addition to the park:

Bishop, Richard H., 1978. Subsistence Resource Use in the Proposed North Addition to Mt. McKinley National Park. Anthropology and Historic Preservation, Cooperative Park Studies Unit, Occasional Paper No. 17. University of Alaska Fairbanks.

Page 168, Backpacking, second paragraph. We continue to object to the annual compendium requirement that all users carry bear proof containers in most backcountry units in the Old Park, especially if no perishable food is being carried and the campers are well away from the park road or bear concentration areas. Not all areas of the Old Park have the same use patterns or bear concentration areas found in selected popular hiking areas adjacent to the park road. Instead, we recommend that food storage be addressed in the same manner as other park backcountry areas by keeping the focus on prohibiting animal attractants and enforcing existing state law (5 AAC 92.230 Feeding of Game), in combination with an education program and the continued availability of containers for loan from the park. This issue has been discussed outside the context of the backcountry management plan so we recommend some recognition that revised guidance may be developed separately in the future.

30
Page 178, Sport Hunting. This section incorrectly implies that all hunting on the preserve regulated by the State’s Board of Game is “sport” hunting. In fact, the state hunting regulations provide for general hunting (including subsistence) through resident and non-resident seasons.

Response to Comments

SoA-28

This change was made on the chapter 3 Errata sheet. See also SOA-17.

SoA-29

These changes were made on the chapter 3 Errata sheet and on the Bibliography Errata sheet.

SoA-30

ANILCA Section 1313 specifically provides for the “taking of fish and wildlife for sport purposes and subsistence uses” within National Preserves. Non-subsistence fishing and hunting is regulated in the preserves under the State of Alaska’s general hunting regulations. As a result, whenever the plan refers to the ANILCA-authorized activity it refers to “sport hunting” or “sport fishing,” but whenever the reference is to the State’s regulation it refers to “general hunting.”

Comments

Further, rural and non-Alaska residents currently can hunt on preserve lands. We recommend use of the term "general hunting" when not specifically referring to subsistence.

Page 188, Snowmachines, first paragraph. We request clarification that, depending on the final alternative selected, the Service may not need to define "traditional activities" at this time. We also continue to request the document reflect Congressional intent to protect Alaskan activities occurring at the time of passage of ANILCA, recognizing that reasonable regulatory processes are available to protect park resources without unnecessary limitations on the types of activities.

Page 188, Off-Road Vehicles (ORVs). See comment regarding page 27. Under NPS regulations at 36 CFR 13.46, ORV use that was traditionally employed for subsistence purposes is allowed unless closed by regulation.

Page 205, Backcountry Management During Winter, first paragraph. The State maintains a longstanding objection to requiring camping permits in the winter and in remote areas where overcrowding, competition, or resource protection are not significant issues and when the minor benefits of permits are outweighed by the burdens imposed on the user. Congress intended that permits be avoided whenever possible. We request the Service delete this requirement during periods and in locations where visitor use is not impacting resources.

Chapter 4

Page 216, Assumptions, #10. We question the relevance of the statement that the majority of [snowmachine] use within park boundaries does not have characteristics that would meet the definition of "traditional activities" presently applied in the Old Park and therefore request its deletion. In light of the different conditions and historical use patterns between the "Old Park" and the ANILCA additions, this statement is presented without appropriate context and implies that these differences are automatically problematic.

Page 232, Trampling and Damage. We recommend the Service include more information from the study conducted by Ms. Kathryn Tietz regarding impacts of trampling on summer and winter vegetation in interior Alaska taiga ecosystems. Of all the studies cited in the text, this study has the greatest relevance to Denali National Park and Preserve ecosystems.

Page 258, Ungulates, second paragraph. The statements in the second paragraph attributed to Mr. Griese are incomplete regarding ADF&G's information on impacts to moose willow habitat in the Talkeetna Mountains. Further information from ADF&G reveals such information is anecdotal.

Page 274, Alternative 4 and **Page 277**, Alternative 5. Based on the cited examples, it appears overly simplistic to attribute minor to moderate adverse impacts to wildlife populations and habitats under Alternatives 4 and 5 strictly to increased snowmachine and motorboat use. Since Alternatives 4 and 5 increase overall recreation in the park, both motorized and non-motorized, we request a more comprehensive statement such as: "*there would generally be minor to moderate adverse impacts to wildlife populations and habitats under Alternative 4 because of impacts from increased recreation use, both motorized and non-motorized.*"

Response to Comments

SoA-31

See response above. Clarifications as to the status of ORV use for subsistence use at Denali were made on the chapter 3 Errata sheet.

SoA-32

This statement was necessary in order to analyze the impacts of defining "traditional activities" as presented in Alternatives 2 and 3, which would define the term with the same language used for the Old Park. The implications of the statement only apply to the impact analysis for those two alternatives.

SoA-33

For winter trampling, the study by Kathryn Tietz (Tietz 1996) is important because it was conducted in Alaska. However, the usefulness of the study is limited because no measurements of the vegetation that was actually subjected to snowmachine traffic were taken prior to applying the use. The assessment that there was no damage was based on an extrapolation from surrounding vegetation. No measurements were taken to see if the compacted snow observed in the experimental treatment trails remained on the vegetation longer than the snow that was adjacent to the trail. Also, no soil temperature data were collected. The results of this work are not sufficient to say conclusively that the impacts observed in other areas would not also occur in Alaska.

For summer trampling, the National Park Service has conducted research at Denali that is the most relevant to the ecosystems in the park. This research is cited in the Vegetation section of Chapter 4: Environmental Consequences.

SoA-34

The information attributed to Herman Griese is appropriately cited as personal communication, not as a scientific study. These observations from a professional biologist are only one source of many that describe potential impacts on wildlife from snowmachine use.

SoA-35

The concluding analysis for wildlife impacts for the modified preferred alternative in the *Final EIS*, which closely follows Alternative 4, was modified to make it clear that non-motorized recreational activities have some effect on wildlife as well. However, most of the serious concerns cited in the text are related to motorized access.

Comments

36

Page 281, Natural Soundscapes. Consistent with previous comments, we request this section also recognize that much of the “noise” generated within the park is from legally authorized access methods under the provisions of ANILCA.

Pages 309-331, Wilderness Resources. See general comments above about wilderness management. In particular we reiterate our concern that the document appears to be using national policies to “trump” the statutory provisions of ANILCA.

37

Pages 332-355, Subsistence Resources and Opportunities. The Methodology section on page 332 states that, “This analysis assumes that adverse impacts to subsistence resources and opportunities from subsistence uses are negligible because subsistence use is very low, especially compared to recreational use of the park.” However, the next 20+ pages detail an array of “major adverse effects,” “moderate adverse effects,” and “adverse effects” that are projected for each of the five alternatives. Similarly, Table 2-11 (page 95) summarizing the projected environmental consequences of each planning alternative, states that the Preferred Alternative “would create unfavorable conditions for subsistence wildlife populations and increase conflicts between recreational and subsistence users.” The cumulative impacts of all alternatives on subsistence are projected to be “major.” Based on the detailed and candid assessment presented concerning the potential adverse effects to subsistence for each alternative, we respectfully disagree that the potential for adverse effects is “negligible.” We request the final plan address this discrepancy.

38

In addition, we recommend the plan be explicit in explaining how the Service will mitigate or avoid adverse effects and cumulative effects on subsistence. For example, Cantwell residents need to know how the Service will address continuing increases in recreational use in areas they have used and continue to use for hunting and trapping in the park additions.

39

Page 348, continuing paragraph about Kantishna. We strongly object to the suggestion that the Service may expand the current firearm closure period in the Kantishna area. The State opposes restrictions on valid subsistence uses that favor expanding seasonal visitor uses. As stated in our comments on the original Kantishna firearm restrictions (January 2000 letter to then Superintendent Steve Martin), the Service must “*guard against management decisions which treat legally-authorized subsistence uses secondarily to non-consumptive uses.*” Although only a small number of qualified local rural residents currently subsistence hunt in the Kantishna area, the area is open for subsistence uses and could be used more frequently in the future. Qualified local rural residents should not continue to see their opportunities to legally conduct subsistence activities in the park additions and preserve reduced in favor of further accommodating recreational users. Extending the firearm closure period would be another incremental step toward effectively eliminating subsistence uses altogether in portions of the park additions in order to accommodate seasonal visitors and recreational users. The State recognizes public safety issues in its hunting regulations that prohibit shooting across and from highways, etc. Any additional firearm restrictions that respond to public safety concerns must be substantiated and must be the minimum necessary.

Response to Comments

SoA-36

The text in this section introduces the topic for purposes of analysis and in no way implies that “noise” in the park is illegal. This topic has been explored elsewhere in the plan (see, for example, chapter 3 Errata sheet and SoA-17).

SoA-37

This statement reflected the impact only of subsistence uses on other subsistence uses. The text is still clear that major adverse cumulative affects to subsistence resources and opportunities have occurred and would still occur under the preferred alternative of the *Revised Draft EIS* and the modified preferred alternative of the *Final EIS*.

SoA-38

The modified preferred alternative contains two specific management area changes designed to mitigate impacts to subsistence use: reducing the intensity of visitor impacts in the Kantishna Hills and the southern park additions east of Bull River. The new standards for encounter rates, natural sound disturbance, and other indicators in these areas should trigger management action that would prevent further deterioration in subsistence resources and opportunities. In addition, the Broad Pass visitor contact station would be used to convey information to non-subsistence users about how and where to travel to avoid adversely affecting subsistence users in the Cantwell area, where the most severe impacts occur.

SoA-39

In the analysis of impacts from the modified preferred alternative, the text is clarified to indicate that an extension of the firearms closure would be a risk in allowing the level of visitor use and facility development identified in the modified preferred alternative, but not a certainty. Visitor safety remains an important NPS concern, and the presence of private land in the Kantishna area reduces the ability of the National Park Service to control visitor use levels in the road-accessible portions of Kantishna.

Comments

40

Page 397, Recreational Opportunity, first full paragraph, third sentence. We recommend the Service delete this sentence because not all “recreational use” would be prohibited and because Section 1110(a) is a minimum guarantee, not a limiting condition.

Page 401, Recreational Opportunity, first full paragraph, third sentence. Comment for page 397, above, applies to this page as well.

41

Chapter 5
Pages 420-425, Consultation and Coordination. We note that the plan and particularly this section, does not describe the hearing and participation requirements found in ANILCA Section 1301(d). This section of ANILCA allows various state and federal agencies, native corporations, and interested stakeholders to participate in development, preparation, and revision of conservation system unit plans. We recommend the Service include recognition of Section 1301(d) in the text of the final plan, including the commitment in the General Management Plan (page 155) that such consultation extends to subsequent step down plans.

Appendices

Pages 492-510, Appendix C: ANILCA Section 810(a) Summary of Evaluation and Findings: This analysis reiterates information presented elsewhere in the plan, and appropriately indicates how some potential impacts to subsistence could be avoided or mitigated. However, we recommend the authors review the information in the 810 analysis with the “Affected Environment” and “Environmental Consequences” sections to ensure that consistent information is being presented throughout the plan. See also our comments regarding pages 332-355.

42

Page 516-519, Appendix E. It appears the Service created the Minimum Requirement Procedure in the plan for use specifically in Denali National Park and Preserve. Consistent with our May 5, 2004 comments to the Arthur Carhart Center regarding the national, interagency “Minimum Requirement Decision Guide,” Denali’s proposed process does not reasonably recognize the obvious statutory exceptions to the Wilderness Act found in ANILCA. For example, question #4 on page 516 should specifically mention ANILCA as a source of special statutory guidance that may allow a specific activity that would not normally be allowed in designated Wilderness. Also, this question should more appropriately be placed as the first or second question in the Procedure prompts.

Page 543, Bibliography. “Haynes, Simeone, and Andersen” is the correct spelling of the authors’ names in this citation.

Thank you for the opportunity to review this revised draft. If you have any questions, please contact me.

Sincerely,

Sally Gibert
ANILCA Program Coordinator

Response to Comments

SoA-40

The sentence was edited in the analysis of the modified preferred alternative to indicate an exclusion of “non-consumptive” uses rather than “recreational activities.” These sentences are part of an analysis of impacts to recreational opportunities from Alternatives 4, 5, and the modified preferred alternative. This statement is an important qualifier to the previous sentence, which indicates that there would be ongoing opportunities to use snowmachines for access to traditional activities. The provisions of the modified preferred alternative do not necessarily protect recreational snowmachine access. If the term “traditional activities” were ever defined similar to the way it is defined in the Old Park, existing NPS regulations would in fact prohibit recreational use of snowmachines without a special regulation to protect such use.

SoA-41

Although Section 1301(d) of ANILCA was not specifically cited in chapter 5, the National Park Service exceeded all the requirements in this section. This plan does not amend p.155 (appendix A) of the GMP, which remains in effect.

SoA-42

The text in chapter 2 has been clarified to indicate that the minimum requirement tool presented in appendix E is an example of the type of tool that could be utilized by the National Park Service, not necessarily the worksheet that would always be used. The National Park Service expects the questionnaire to evolve over time and respond to particular needs in Alaska wilderness areas and Denali in particular.

Comments

Formal action on the Revised Draft Denali Backcountry Management Plan from the June 28, 2005 Denali Subsistence Resource Commission Meeting

Motion: by Vernon Carlson to make subsistence a priority over other backcountry uses in the backcountry plan. Percy Duyck seconded the motion, and it passed unanimously.

Justification: Rather than single out particular areas that are important to subsistence, subsistence should be made a priority throughout the ANILCA additions because subsistence use areas can change, and because this way no one's prime use area will be excluded.

Motion: by Ray Collins that the following points be recognized in the

Backcountry Management Plan:

1. Identify management zones that specifically recognize subsistence as a purpose/priority in those areas. These management zones should be applied to areas presently used, and adapted to should changes in subsistence use patterns occur in the future.
2. The plan should contain more specific guidance on the management of conflicts between subsistence and recreational use.

Jeralyn Hath seconded the motion, and it passed unanimously.

Motion: by Ray Collins requesting that the NPS hold a formal discussion on the management of conflicts between subsistence and recreational uses of park lands, and to draft guidelines to aid in decision making when those conflicts occur. Percy Duyck seconded the motion, and it passed unanimously.

Response to Comments

SRC-1

ANILCA Section 202(3)(a) specifies that subsistence uses by local residents "shall be permitted in the additions to the park where such uses are traditional," and Section 810 requires certain criteria to be met before a Federal agency takes an action that would "significantly restrict subsistence uses." However, there is no legal provision that would allow for subsistence to be prioritized above non-consumptive uses.

SRC-2

The modified preferred alternative does not prioritize subsistence use in any management area. However, to reduce future conflicts between subsistence and other uses the southern Kantishna Hills and the Broad Pass area east of the Bull River were designated Management Area B to keep recreational visitor impacts low and relatively dispersed compared to Management Area A. Keeping visitor intensity low should minimize the number of conflicts. When conflicts do occur, the National Park Service would utilize the tools described under the Access section of chapter 2. See also SoA-38.

Comments



DEPARTMENT OF THE AIR FORCE
PACIFIC AIR FORCES

MAY 30 2003
Superintendent's Office
JUN 28 2005
Denali National Park Service

Superintendent
Attn: Denali Backcountry Management Plan
P.O. Box 9
Denali Park, AK 99755

Colonel Jerry I. Siegel
Commander, 611 Air Operations Group
9480 Pease Avenue, Ste 102
Elmendorf AFB, AK 99506-2100

Dear Mr. Anderson,

As the airspace director for the Air Force in Alaska, we are sensitive to land management issues involving activity below the Alaskan military training airspace. The southern section of Denali National Park lies under a portion of Sustina Military Operations Area (MOA), classified by the FAA as Special Use Airspace.

First, let me congratulate you, your park planning staff and the regional Park Service staff for their continued close cooperative work, both with this project and the 11th Air Force Resource Protection Council (RPC). Particularly, we thank Mr. Tranel and Mr. Loeb for keeping our staff informed as this project has developed over the past 20+ months. We are writing to comment favorably to the draft Environmental Impact Statement (EIS). We want to make one suggestion. The draft makes reference in several places to forming a working group for achieving desired conditions in the park as affected by aircraft. You could delete the "military" reference in these locations for the following reason. The 1997 Alaska MOA EIS Record of Decision formed the RPC to address inter-agency issues such as this. That consultation process is established and working very well. In fact we think it is a national model. So to put it succinctly, we are already there. There is no need to invite additional military participation. Duplication would only serve to confuse resource managers.

1

Two corrections or clarifications need to be addressed. In Chapter 3, Transportation & Access section (page 230), Sustina MOA use is mentioned. We assume the data comes from the MOA EIS. In fact we have found that our use is much less than predicted. If you assume 1hr per sortie, the EIS predicted about 3,600 hrs per year (based on 15 sorties/day and 240 days/yr). Last year we used the MOA only 926 hours (75% less). The same paragraph lists the MOA as an "operating" area. It's actually spelled as an "operations" area.

Response to Comments

USAF-1

This information is included in the chapter 3 Errata sheet.

Comments

Thank you for the opportunity to comment. As you might expect, my staff and their families and friends take great delight in having such a treasure so close to Anchorage and Fairbanks. The park is a national asset in whose stewardship we take honor in being partly responsible.

Sincerely,



JERRY I. SIEGEL, Colonel, USAF

cc:
11 AF/CV
611 ASG/CC
NPS AK Region, Judith Gottlieb

Response to Comments

Comments

National Parks Conservation Association, The Wilderness Society
Alaska Center For The Environment, Alaska Quiet Rights Coalition,
Northern Alaska Environmental Center, Trustees For Alaska,
Natural Resources Defense Council, Denali Citizens Council

16 June 2005

Paul Anderson
Superintendent
Denali National Park & Preserve
P.O. Box 9
Denali Park, AK 99755

Dear Superintendent Anderson,

On behalf of the above named organizations, I submit the attached People For Parks Alternative to the Revised Draft Denali Backcountry Management Plan. Development of this plan started soon after many of us had read key chapters and felt that the range of alternatives offered by the Park Service did not reflect the conservation community's desires or our legal interpretation for how best to manage Denali National Park & Preserve.

We are providing the People For Parks Alternative as a better future for Denali and are asking grassroots park activists across the country to support it. We are providing this outline to you in advance of sharing it with park activists so you will have the detail in-hand when the comments begin to arrive.

You can expect additional, more detailed comments from us as the comment deadline approaches. The quality of these detailed comments and the extent of our ability to generate public comments on the Denali Plan would be significantly increased with a two-week extension on the comment deadline.

If you have questions about this People's Alternative, please don't hesitate to contact us.

Sincerely,

Joan Frankevich
Alaska Program Manager
National Parks Conservation Association

Response to Comments

Comments

People for Parks Alternative: A Better Future for Denali

Denali Backcountry Management Plan
June 2005

1 The *People for the Parks Alternative* uses a combination of the proposed alternatives as outlined in the chart below. The goal of the People's Alternative is to keep Denali National Park an intact and naturally functioning ecosystem for hundreds of years to come while giving backcountry users outstanding opportunities to observe wildlife while finding refuge from the bustle of the everyday world. Additionally, the People's Alternative emphasizes the following points.

- 2 • **Use the Precautionary Principle** – The National Park Service Organic Act directs parks to be managed so that the scenery, natural and historic objects and wildlife are left “*unimpaired for the enjoyment of future generations.*” This plan’s style of management based on “desired future conditions” may sometimes delay action until after damage occurs. In order to fulfill the congressional mandate of the Organic Act, this plan needs strengthening to give park managers the authority to act easily and decisively before park resources are impacted, not after.
- 3 • **Emphasis on a Quality Visitor Experience** – We support and endorse the plan’s emphasis on intangible values such as the ability to experience solitude in an untrammeled landscape where the sounds of nature predominate. These values are necessary to preserve Denali’s wilderness character for future generations of backcountry users. It is the Park Service’s responsibility to manage the park for these values.
- 4 • **Determine Funding and Details for Monitoring Program First** - Before adoption of this plan, it is imperative NPS has a detailed and fully funded monitoring program developed with public involvement. This plan also needs to detail how NPS will monitor and enforce the stipulations of this plan if little or no additional funding is made available.
- 5 • **Do Not Authorize Recreational Snowmobiling** - Alternatives 3, 4, and 5 allow recreational snowmobiling in the park additions and preserve. Recreational snowmobiling is illegal in Denali, damages park resources, and must not be authorized in this plan. To accomplish this the definition for traditional activities currently in use for the Old Park needs to be extended to the 1980 Park Additions and Preserve.
- 6 • **Complete the Wilderness Recommendation** - As required by the Alaska National Interest Lands Conservation Act (ANILCA) the Park Service conducted a wilderness review in 1988 and concluded that approximately 3.73 million additional acres were suitable to be designated as Wilderness. NPS must fulfill its ANILCA obligation to complete the process by having the President forward its recommendation to Congress. In the meantime, NPS can take no action to either diminish the wilderness suitability of the area or reduce the probability of a wilderness designation.

Response to Comments

PfP-1

The People for Parks alternative combines elements from several different alternatives and proposes one additional element (wilderness recommendations) that was considered by the National Park Service during scoping but rejected from inclusion within this plan. The People for Parks alternative cannot be considered a complete alternative, since it did not address many important topics including management area descriptions, indicators and standards, and general guidance for commercial services and wilderness management. For the purpose of response, the National Park Service has treated the alternative as a set of substantive comments on several key issues of concern.

PfP-2

The National Park Service agrees with the precautionary principle described here. Chapter 1 of the *Final EIS* clearly establishes the ability and responsibility of the National Park Service to take action before unacceptable harm to park resources occurs. The language of chapter 2 provides the tools the National Park Service would use. The National Park Service does not have to wait for conditions to match or exceed standards before taking management action. An expectation that conditions would exceed standards is sufficient to motivate a management response.

PfP-3

The National Park Service agrees with the importance of intangible values at Denali. These values are articulated in chapter 1, and the plan commits the agency to protecting them.

PfP-4

The BCMP is a GMP amendment that sets out broad parameters for how the park should be managed. It provides goals and some specific guidance about how those goals should be reached, and identifies the additional work and funding that would be necessary to achieve the plan goals. The role of this plan is to provide the basis for the National Park Service to develop an appropriate monitoring plan and to pursue funding and program development to implement it.

response continued next page

Comments

Category	Alternative	Explanation/Rationale
<u>General Concept</u>	2	Denali should continue to be managed as a wilderness park with non-motorized opportunities for wilderness experiences that are markedly different than surrounding public lands.
<u>Motorized Access</u>	2/3 modified	Apply the definition of <i>traditional activities</i> currently used in the Old Park to the entire Park & Preserve.
<u>Registration</u>	2	We support convenient registration for all backcountry day users in order to provide park managers with information for better management.
<u>Climbing Limits</u>	3	We agree that a modest increase of climbers over current levels to 1500 to be reevaluated in 10 years is a needed and reasonable limit.
<u>Commercial Airplane Landings</u>	3/4 modified	In order to support a range of mountaineering experiences that includes some climbing areas free from the noise and intrusion of scenic air tours we support the language in Alternative 4 modified as follows (<i>changes in italics</i>): Allow scenic air tour landings on glaciers in all areas designated as Management Area A, <i>except scenic tour landings would not be allowed on the Eldridge Glacier, Little Switzerland or the Ramparts. Scenic air tour landings would be restricted to 9 am to 9 pm.</i>
<u>Commercial Guided Hiking</u>	3/4 modified	We support the guided hiking options in Alternative 3 with the following modifications: <i>No guided backpacking should be allowed in the Kantishna Hills until there is a comprehensive plan for management of the Kantishna region.</i> Only educational programs should use the entrance area trails, with the exception of the trails listed in Alternative 4 which could be used for guided hiking.
<u>Guided Sport Hunting</u>	2	Retain the status quo.
<u>Other Commercial Activities</u>	2	Retain the status quo.

7

Response to Comments

PF-5

The modified preferred alternative does not specifically authorize recreational snowmachining and there is no change to the types of activities for which snowmachines may be used. ANILCA Section 1110(a) allows snowmachine use “for traditional activities” and ANILCA Section 811(b) allows appropriate use of snowmachines for subsistence purposes if traditionally employed. Both are specifically subject to reasonable regulation. Because the term “traditional activities” is not defined in statute or regulation, there is no means to determine whether existing snowmachine use is legal or illegal under present regulation. For the purposes of the modified preferred alternative, it is not necessary to make a decision on this issue. The modified preferred alternative sets specific standards for resource and social conditions for the various management areas of the park. For the National Park Service, the priority for backcountry management would be to ensure that the standards are met. If standards are not achieved or conditions are deteriorating in part or in whole because of snowmachine access, a logical first step for the National Park Service to address the issue might be to determine through a rule-making which park visitors are using snowmachines for traditional activities and which are not.

PF-6

As described in chapters 1 and 3 of the BCMP, the National Park Service completed a wilderness suitability review and prepared a proposal for the Secretary of Interior as directed by ANILCA Section 1317. Although the process specified by Section 1317 was not completed, there is no additional action that could be taken by the National Park Service at this time that would advance the process in the absence of congressional interest.

PF-7

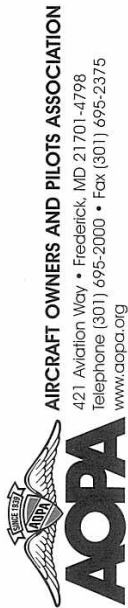
Under the modified preferred alternative, scenic air tour landings would not be allowed in the Ramparts. Although scenic air tour landings could occur on the Pika or Eldridge Glaciers, management area standards would not allow nearly the same number of landings as occur on the Ruth Glacier. Additionally, the text of the plan establishes clearly that these glaciers would be secondary landing areas to be used only when landing locations in Management Area A are unavailable, and landings would be discouraged whenever climbers and mountaineers are present. Scenic air tour landings would be restricted to 9am to 9pm.

Response to Comments

Comments

<u>Trails</u>	4	While we support the “no formal trails” policy for Denali’s backcountry we recognize that several unplanned social trails exist and that park resources are best protected by constructing trails as needed in the areas listed in Alternative 4. We assume EAs will be written and the public involved when any trail construction moves forward in the park.
<u>Park Road</u>	no choice	We support improved access for non-motorized winter sports such as cross-country skiing, ski-joring, and dog mushing. Any combination of alternatives 1-4 that achieves this goal and is amenable to local users is acceptable.
<u>Campsites</u>	2 modified	We recommend no campsites be designated in the Kantishna Hills as they are not needed at this time. If resource damage appears to be imminent, then NPS should look at options ranging from closing the site to hardening it and creating a designated campsite.
<u>Shelters and Cabins</u>	3	We support facilities at the park entrance that promote opportunities for non-motorized winter recreation.
<u>Information Facilities</u>	3 modified	We don’t support a new facility in the Cantwell/Broad Pass area unless there is a demonstrated need. We recommend changing “ <i>would operate</i> ” to “ <i>could operate</i> ”.
<u>Administrative Camps</u>	3	Retain the status quo.
<u>Information & Education</u>	3 modified	We support the educational opportunities outlined in Alternative 3 with the elimination of designated campsites in Kantishna. Designated campsites could be created when and if resource impacts show a demonstrated need.

Comments



July 13, 2005

Mr. Paul Anderson
Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali Park, AK 99755

RE: Denali National Park and Preserve Revised Draft Backcountry Management Plan

Dear Mr. Anderson:

The Aircraft Owners and Pilot's Association (AOPA), on behalf of over 405,000 general aviation pilots, including over 4,500 pilots in Alaska, supports continued general aviation access throughout Denali National Park and Preserve with a Back Country Management Plan that ensures future general aviation access consistent with existing regulations as highlighted in Alternative Five of the revised draft plan. AOPA contends that Alternative Five would provide the least impact on general aviation operations while preserving the natural sound resource throughout the park. However, AOPA is concerned with the Natural Sound Disturbance standards that have been established based solely on human observations and a few automated sound stations.

Access:

At over six million acres in size, aviation provides an essential means for the public to experience Denali, as well as ensuring the opportunity to access remote locations of the park. And while Denali National Park is nearly the size of the state of Maryland, it is served by a single 88-mile gravel road. Access by air is a critical component for visitors and the Park Service staff alike. We appreciate that the National Park Service (NPS) plans to continue to allow non-commercial general aviation landings in the Old Park. AOPA supports continued access for general aviation in all portions of the Old Park, park additions and preserve, to provide access to the backcountry.

Overflights:

AOPA supports and commends the NPS on its action to establish an overflights working group as proposed in all action alternatives. AOPA opposes limitations on general aviation aircraft overflights and re-affirms our willingness to participate in the overflights working group with a goal of developing voluntary guidelines to protect park resources, while preserving airspace access.

Response to Comments

Comments

Mr. Paul Anderson
Page 2
July 13, 2005

Soundscape:

AOPA is concerned with the proposed soundscape standards as a basis to limit access to either airspace or landing areas in Denali National Park. There is insufficient base line data available to evaluate the impact of the standards proposed in the plan. The limited data that has been collected indicates that Stampede, a relatively "quiet" region of the park, exceeds the proposed standards at least part of the time. At this time we are unable to establish whether this is the result of an overly restrictive sound standard, or placement of the sound monitoring equipment with respect to the airstrip.

While AOPA is sensitive to noise considerations, we need to see a scientifically valid plan for soundscape monitoring, and baseline data acquired over a full range of seasons to establish if the proposed standards are realistic. Though NPS proposes to revisit the standards after more baseline data has been collected, we believe it is premature to adopt them for use in operational management of the park.

Visitor Education:

Even while NPS works to establish soundscape standards for Denali National Park, it is important to manage visitor expectations concerning the role of aircraft as part of the nation's transportation system, and their role in management of the park itself.

Sources of air traffic include commercial jets at cruise altitude, and smaller general aviation aircraft traveling between Alaskan communities whose flight path just happens to over fly the park.

The limited road access in an area over six million acres in size requires the NPS itself to use aircraft and helicopters for law enforcement activities, game surveys, search and rescue and other management activities. While the NPS plans to evaluate its own administrative use of aircraft, it is difficult to see a scenario that reduces the reliance on aviation significantly. Yet the low-altitude nature of these operations are often what cause visitor complaints.

AOPA believes it is imperative to educate users as to the role aviation plays in the transportation system that supports Denali and allows the NPS to maintain the park with the lack of surface transportation that would otherwise be developed. A strong aviation education program combined with efforts to reduce motorized noise where possible should serve as a winning combination to continue to enjoy high quality visitor experience, and provide resource protection consistent with the goals of the park. The overflights working group should be used as a resource in assisting the development of visitor education on the important role aviation plays at Denali.

Response to Comments

AOPA-1

The National Park Service agrees that data from the Stampede area, as well as elsewhere in the park, are limited, and leads to the types of questions raised. Nonetheless, the agency is appropriately establishing provisional indicators and standards for natural sound disturbance. The application of indicators and standards through the Visitor Experience-Resource Protection (VERP) process is the recommended methodology for NPS managers to meet statutory requirements for addressing carrying capacity in GMP documents. The NPS VERP Handbook (NPS 1997b) provides guidance to managers on the entire process. The handbook specifically recommends establishing provisional indicators and standards in instances where additional information is needed to assure validity and monitoring feasibility. The National Park Service acknowledges that more information is needed to fully inform the discussion of standards for natural sound in the backcountry, but believes enough information exists to establish provisional indicators and standards while additional data are collected.

AOPA-2

The BCMP proposes a wilderness education program for all park visitors, and a discussion of the role of aviation in providing access to wilderness in Alaska could be a part of that program. The National Park Service highlights in its educational programs the importance of scientific research at Denali, which also brings to the fore the role of aviation in supporting research activities. However, the 2000 survey of overnight backpackers at Denali (Swanson et al. 2002) found that backpackers who arrived at the park with no knowledge of aircraft activity were more likely to report that overflights annoyed them and detracted from their experiences when informed about aircraft activity prior to their trip than when the presence of aircraft was not mentioned. It cannot be assumed that better information will mitigate impacts on experiences.

Comments

Mr. Paul Anderson
Page 3
July 13, 2005

Public Safety:

Given the lack of surface access in Denali, the NPS is encouraged to enhance existing and historical landing areas for visitor access and for use by park service personnel in management of the park. AOPA supports the concept of portals introduced in the plan, but would like to see them extend beyond the glacier landing areas to provide access in remote portions of the park, particularly in the west and north units far from the park road. It would be beneficial to chart these landing areas so that backcountry visitors may know their locations as possible points to enter or exit the backcountry, and in case of emergency or changes of plan which may require rescue and evacuation.

We note the Wrangell St. Elias National Park has made constructive use of backcountry airstrips and public use cabins that support low-impact use of the backcountry and promote public safety. In that park, a partnership has been developed with an aviation organization that donates labor to support the upkeep of the airstrips, helping keep park maintenance costs at a minimum. AOPA would support such a partnership in Denali.

AOPA appreciates the opportunity to provide comments and recommendations on the revised draft plan and encourage the NPS to take all appropriate measures to ensure general aviation access is maintained throughout Denali National Park and Preserve.

Sincerely,



Heidi J. Williams
Director
Air Traffic Services

Response to Comments

AOPA-3

Portal management areas were designed to be areas that have a substantially higher level of use than surrounding areas. Although there are many airplane landing areas in parts of the backcountry that are not designated as Portals, the BCMP prescriptions do not intend for those areas to develop into extremely busy landing locations as is true for the Portals on the glaciers. At present, use at these other landing areas is believed to be very low and even significant increases in use would not lead to a violation of management area standards in those areas. The National Park Service is presently inventorying landing areas and could consider charting them in the future.

3

Comments

July 15, 2005

Mr. Paul Anderson
Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali Park, AK 99755

RE: Denali National Park and Preserve Backcountry Management Plan

Dear Mr. Anderson:

The Alaska Airmen's Association, representing over 2,000 general aviation members in Alaska, applauds the efforts of the Park Service staff to produce an inclusive and comprehensive plan for Denali Back Country, and supports it with minor suggestions.

Access for general aviation is our most important issue. The backcountry in Denali has essentially no road access, and very few trails which provide surface access. Consequently, aviation is vital to be able to access the park. Not only do our members use aircraft to access remote regions of Denali, but the National Park Service uses aviation for a variety of management activities, ranging from search and rescue to wildlife studies. Based on our concerns regarding access, we support Alternative 5.

We support the adaptive management concept outlined in the plan, which employs a graduated series of management tools to protect park resources. However, we are concerned that the soundscape standards presented in the plan may set standards not based on good scientific data and may be too restrictive. We feel that a better sound monitoring program must be developed and several years of data collected before these standards are adopted.

Santa Monica Airport, with several sound monitors and many years of measuring has set a standard 80dBA and aircraft as small as some Cessna Citations are excluded. 40dBA for the majority of Denali Park does not appear to be scientifically appropriate. We are willing to participate in flyover testing to assess dBA at various altitudes with different aircraft.

The Airmen's Association supports an overflights working group, as a means to define voluntary measures to address issues concerning the park. Our association is willing to participate in this forum.

Response to Comments

AAA-1

See AOPA-1.

AAA-2

Santa Monica airport is located in one of the largest metropolitan areas in the United States, and the standards appropriate there may not be appropriate at Denali. A standard of 40 dBA was proposed for parts of the Denali backcountry based on its wilderness resources, suggested guidance in draft documents from the NPS Natural Sounds Program, and data from Denali that suggest the standard is achievable in many locations.

Comments

We believe the studies cited in the plan concerning the impact of aircraft noise on park visitors suggest that NPS needs to do a better job managing the visitor expectations. In order to manage a park of this size, in an almost completely roadless fashion, the use of aircraft and helicopters is essential. Consequently, park visitors need to be educated concerning the uses of aircraft they may see while traveling in the park. Explaining the role of aviation with regard to the lack of surface access is very important to visitors understanding this relationship, as the aircraft often generating complaints are those operating at low-level on park service missions.

3

Finally, the Airmen's Association would like to see the concept of portals expanded from the glacier areas to other remote areas in the park. Airstrips should be charted and maintained at appropriate levels to provide access for backcountry hikers and other visitors. We also would like to see public use cabins provided in association with backcountry airstrips both for recreational use and as a matter of public safety given the harsh climate and lack of infrastructure

4

Thank you for the opportunity to comment on this plan. We look forward to continue working with NPS as the plan is developed.

Sincerely,

Felix M. Maguire, Director
Chair Legislative Committee
Alaska Airmen's Association

Response to Comments

AAA-3

See AOPA-2.

AAA-4

See AOPA-3 regarding airstrips and SoA-25 concerning public use cabins.

Comments



Alaska Outdoor Council

PO Box 73902
Fairbanks, AK 99707-3902
(907) 455-4AOC (4262)
aoc@alaska.net
www.alaskaoutdoorcouncil.org

July 13, 2005

Mr. Paul Anderson
Superintendent
Denali NP and Preserve
PO Box 9
Denali Park, Alaska 99755

RE: Comments on the Revised Draft Backcountry Management Plan

General Comments

The Alaska Outdoor Council (AOC) represents over 10,000 Alaskans who fish, hunt, trap and recreate on public lands and waters in Alaska. AOC participated in the public process which resulted in the passage of Public Law 96-487, the Alaska National Lands Conservation Act (ANILCA).

One of the purposes of ANILCA is to "... preserve wilderness resource values and related recreational opportunities including but not limited to hiking, canoeing, fishing and sport hunting ..." (Title I, Sec.101 (b)).

ANILCA added vast acreages to Mt. McKinley National Park and re-designated the entire unit as Denali National Park and Preserve. The stated management purposes of the park additions and preserve lands include: "... to provide continued opportunities, including reasonable access, for mountain climbing, mountaineering, and other wilderness recreational activities" (Title II, Sec.202 (3)(a)). The same Section also specifies that subsistence uses by local rural residents shall be permitted in the additions to the park where such uses are traditional.

Many AOC members and other Alaskans vividly remember the intense political struggles to have included in the purposes of Denali National Park and Preserve accommodation of the activities cited above, which are so integral to Alaskan traditions, lifestyles, and values.

The AOC objects to and opposes the diminishment in the Revised Draft Back Country Management Plan of the opportunities specifically provided for in ANILCA. These opportunities are threatened by the NPS's reliance on orders of questionable relevance, such as those relating to "soundscape preservation", "wilderness management", and in the backcountry Draft, the "commercial services plan". Ignoring the legislative distinctions among pre-existing park lands, park additions, and preserve lands and their

Comments

stated management purposes threatens the hard-won accommodation of traditional Alaskan resource uses.

Painting all “back country” with minor variations of the same pristine preservation purposes brush betrays the formal recognition of the diverse values Congress finally provided. Congressional recognition must be respected and supported by the National Park Service.

Wilderness Designations and Management:

The AOC opposes the application of indicators or standards that would apply The Wilderness Act of 1964 prohibition of recreational activities on lands not designated Wilderness by Congress. Denali Park additions and Preserve are not managed under the Wilderness Act regulations. Restrictions on “traditional activities” proposed on additions to the pre-ANILCA Mt. McKinley NP in Alternatives 2 thru 5 are arbitrary and capricious actions.

Under the heading Need For Plan (page 5, Denali Revised Draft Backcountry Management Plan, 2005) the NPS writes “Visitation has grown dramatically for some backcountry activities-use is much more dense, creating concerns about damage to resource and generating conflicts among different user groups. For many locations and activities, the NPS has little information about the extent and character of use.” The Denali Revised Backcountry Management Plan (BMP) fails to provide the data necessary to substantiate their claims of resource damage or user conflicts on lands added to Denali National Park and Preserve. The numbers of backcountry overnight stays in Denali NP and P have oscillated between 26,029 in 1985 to 34,016 in 2004. (Page 164, table 3-9) The Denali BMP fails to state how many of these backcountry overnight stays occurred on 3.73 million acres of park addition and preserve lands, not designated as Wilderness.

Traditional Activities:

The Minimally Acceptable Resource and Social Conditions (page 39-49) proposed for lands added to the preexisting park, by ANILCA Section 202(3)(a), are far more restrictive than Congress ever intended. Adherence to qualitative and quantitative standards for Natural Sound Disturbance (Table 2-5) for Denali Park additions and Preserve would virtually eliminate motorized access for “traditional activities” such as subsistence and sport hunting and fishing, as well as recreational snowmobiling and boating. These “traditional activities” are clearly protected by law under Section 1110 of ANILCA.

Access:

The NPS has made their intentions clear regarding recreational motorized uses on Denali park additions and preserve lands, “If in the future the term “traditional activities” were defined to exclude recreational use, such recreational use would be prohibited by existing NPS regulation.” (Page 397) Natural sound disturbance

Response to Comments

AOC-1

The Wilderness Act does not “prohibit recreational activities” and the application of indicators and standards in the BCMP does not prohibit recreational opportunities. Indicators and standards provide guidance for acceptable levels of impact from visitor activities, and are the recommended tool for the National Park Service to address carrying capacity as provided for in the National Parks and Recreation Act of 1978. Indicators and standards do not by themselves restrict recreational activities either, although the National Park Service could take action in the future to manage activities in order to assure standards are met. While the park additions and preserve are not designated wilderness under the Wilderness Act, ANILCA does state that purposes for the park include “preserve wilderness resource values and related recreational opportunities” and “provide continued opportunities, including reasonable access, for mountain climbing, mountaineering, and other wilderness recreational opportunities.” The indicators and standards chosen for park additions and preserve are consistent with those statutory purposes. None of the alternatives in the plan propose specific restrictions on “traditional activities” in the park additions and preserve, although Alternatives 2 and 3 would define the term similar to the way it is defined for the Old Park.

AOC-2

See AT-1 and ISMA-1. While overnight use has fluctuated over time, it has been slowly trending upward. Chapter 3 of the *Revised Draft EIS* provides numbers that are available, including those for mountaineering registration on Mt. McKinley, voluntary registrations from other mountaineering destinations, and overnight registrations from other mountaineering use by airplane, snowmachine, and foot are among the most rapidly increasing forms of visitation at Denali, but only data from commercial airplane landings is available. The landings data show tremendous increases in visitation and are provided in the Visitor Use section of chapter 3. The National Park Service is responsible for managing visitor use to protect park resources in the park additions as well as the Denali Wilderness.

Comments

descriptors of sound for Denali park additions and preserve is nothing more than a veiled attempt to circumvent existing laws allowing traditional activities.

Commercial Services:

Sport hunting is one of the wilderness resource values and related recreational opportunities included in ANILCA Section 101. (Page 8) All Denali Preserve lands are open to non-subsistence hunters, when local resident subsistence harvest needs are being met.

Guided Sport Hunting concessions should be made available in the entire Denali Preserve.

4

Conclusion:

Thank you for the opportunity to comment on the Denali Revised Draft Backcountry Management Plan. The AOC believes management of backcountry recreational opportunities and the preservation of resource values in Denali National Park and Preserve can be achieved without unnecessarily restricting traditional activities. Alternatives 2 thru 5 are over restrictive regarding traditional activities on Denali Park additions and Preserve. AOC supports Alternative 1 as the only viable option for legally adhering to the congressional mandate of ANILCA; Section 101, Section 202(3)(a), Section 1301(b)(4), Section 1317(c), Section 1314, and Section 1110(a).

The AOC supports Alternative 1, until such time as the NPS revises their Denali Backcountry Management Plan to separate regulations pertaining to the pre-ANILCA portion of the Park, congressionally designated Wilderness, from park additions and the preserve created by ANILCA. A revised Denali Backcountry Management Plan should contain the necessary data to substantiate alleged recreational user conflicts and resource damage in Denali National Park additions and Preserve areas separate from the old Mt. McKinley NP.

Sincerely,

Rod Arno, Executive Director of the Alaska Outdoor Council

Cc. U.S. Senator Ted Stevens
U.S. Senator Lisa Murkowski
U.S. Representative Don Young
Alaska Governor Frank Murkowski

Response to Comments

AOC-3

The sound standards specifically allow for a level of motorized access for traditional activities based on data presented in the natural sound sections of chapters 3 and 4. However, the total amount of motorized noise is still limited to protect natural soundscapes and other resources and values. ANILCA 1110(a) subjects access for traditional activities to “reasonable regulations by the Secretary to protect the natural and other values of the conservation system units.” The National Park Service is committed to providing legal access with accompanying reasonable regulation.

AOC-4

See APHA-1.

Comments

LAW OFFICES
BIRCH, HORTON, BITTNER AND CHEROT
A PROFESSIONAL CORPORATION
1155 CONNECTICUT AVENUE, N.W. • SUITE 1200 • WASHINGTON, D.C. 20036 • TELEPHONE (202) 668-5800 • FACSIMILE (202) 669-1027

T. HORTON (1944 - 1998)
*W.B. ANDREWSKI
WILLIAM H. BITTNER
KATHRYN A. BLACK
KATHLEEN TORNER ERE
GREGORY S. FISHER
DOUGLAS S. FULLER*
DAVID G. GARDNER
DAVID KARE GROSS
MICHAEL J. HANSEN
WILLIAM P. HORN*
ROY S. JONES, JR.
DANIEL C. KENT
THOMAS F. KLINNER
STANLEY F. LEVINS
MICHAEL J. PARKER
TIMOTHY J. PELUMENOS
ELIZABETH H. ROSS**

OF COUNSEL:
JENNIFER C. ALEXANDER
SHELLEY D. BERNAL
KENNETH E. VASSAR

1127 WEST SEVENTH AVENUE
ANCHORAGE, ALASKA 99501-3399
FACSIMILE (907) 272-3880
* D.C. BAR
** D.C. AND ALASKA BAR
*** WYOMING BAR
† NOT YET ADMISSIONED
‡ ALL OTHERS ALASKA BAR

July 1, 2005



Mr. Paul Anderson
Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali Park, AK 99755

Dear Mr. Anderson:

The following comments on the Revised Draft Denali Backcountry Plan are submitted on behalf of the Alaska Professional Hunters Association (APHA).

Hunting Opportunities

APHA strongly supports opening the entire southwestern Preserve area to guided hunting and dividing the area into two guide units. This will effectively re-open an area closed for many years, assure two economically viable guide units, and expand recreation opportunities within the Preserve.

Additionally, we support those elements of Alternative 5 that would create new guided opportunities in the northern Preserve unit proximate to Lake Minchumina. We do not perceive any conflicts with subsistence users in the area. The text of the Plan notes that Lake Minchumina is primarily a non-Native community and that most subsistence taking in Denali is associated with Cantwell (see pages 143-146, 153). Similarly, the population of Teleda is declining and makes very limited demands on the wildlife resources of the Preserve. These facts provide support for expanding guided hunting opportunities in the northern Preserve area.

Access

We continue to oppose efforts to regulate ANILCA-guaranteed access on the basis of "social conditions", the "experiential values" of Wilderness backpackers, or the aesthetic sensibilities of some backcountry users. This is inconsistent with the law and greatly facilitates the ability of NPS, and other federal agencies, to impose restrictions with the law and greatly facilitates motorboat access. Nothing in the law gives this subset of users (i.e., backpacking wilderness enthusiasts) special status that allows their subjective perceptions to become the basis for restricting other less sensitive users of the public lands (see pages 168-169). Motorized access

Response to Comments

APHA-1

Unlike the southwest preserve, the northwest preserve has active subsistence users who are dependent upon the resources of the area and who feel that additional pressure on resources from guided sport hunting would be detrimental to their use. The National Park Service is choosing to be cautious in authorizing new guide areas in the northwest preserve until persuaded that the resources can withstand the additional use and that the commercial service would be necessary and appropriate.

APHA-2

See ISMA-2. Under the modified preferred alternative, the National Park Service would address airplane and motorboat access using the Access Management Tools in Table 2-11. These tools are employed whenever management area standards are approached or exceeded. Standards are defined to protect Denali's resources and values, which are identified in the purposes of the park identified in ANILCA. These purposes include "preserve wilderness resource values and related recreational opportunities" and provide opportunities and reasonable access for "wilderness recreational activities." Consideration of intangible resource values is essential for realizing the statutory purposes of the park and preserve. Restrictions and closures may not be necessary for achieving the standards identified in the plan, and the modified preferred alternative commits the National Park Service to using the "least restrictive mechanism or 'tool' to accomplish the goals of the plan.

Comments

BIRCH, HORTON, BITTNER AND CHEROT
A PROFESSIONAL CORPORATION

Mr. Paul Anderson
July 1, 2005
Page 2

Response to Comments

resirictions and closures must be based on demonstrable and detrimental impacts to physical, tangible resources. And then, the closures should be the smallest practicable in time and space to address the impacts.

To that end, we support the hierarchy of tools identified in the plan (page 50-51). Using actual closures as the tool of last resort is fully consistent with ANILCA. We note that section 1110(a) grew out of express promises made to APHA by then Alaska Lands Subcommittee Chairman Rep. John Seiberling that Congress would make special provisions to assure access via airplanes, motorboats, and snowmachines notwithstanding the traditional restrictions associated with Park or Wilderness status.¹ It is critical that the letter and spirit of the access guarantee enshrined in ANILCA be honored completely. At this point, the Plan – excepting the tools approach – fails to do that.

Thank you for the opportunity to comment on the Plan.

Sincerely,

BIRCH, HORTON, BITTNER
AND CHEROT



Gretchen L. Gaston

cc: Drue Pearce
Cam Toohy
The Honorable Ted Stevens
The Honorable Lisa Murkowski
The Honorable Don Young

¹ Hearings before the Subcommittee on General Oversight and Alaska Lands, No. 95-16, Part XII, August 20, 1977, page 179.

Comments

Paul Anderson, Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali Park, AK 99755

Dear Mr. Anderson:

The purpose of this letter from the Alaska Quiet Rights Coalition (AQRC) is to submit comments on the Revised Draft Backcountry Management Plan for Denali National Park and Preserve (Plan).

The Alaska Quiet Rights Coalition is a statewide, nonprofit organization which, like the National Park Service, regards the natural soundscape as a natural resource to be protected, like other resources, by the managers of public lands. Our advocacy for natural quiet in the backcountry is not just to eliminate sounds of motors, but to create opportunity for the quiet recreationist to experience the intangible values, such as peace, solitude and self sufficiency, that a natural soundscape affords. On lands managed by agencies with a multiuse mandate, AQRC calls for a fair balance of recreational opportunities for the motorized and nonmotorized recreationist, both summer and winter. We advocate for both road-accessible and backcountry opportunities for the quiet recreationist. AQRC is also concerned with the rights of cabin owners to have peace and quiet and for wildlife to be free from the noise of recreational machines in the backcountry.

AQRC applauds the efforts made in this Plan to articulate, in a straightforward manner, the unique wilderness and resource values of this Park and NPS's legal obligations under the Organic and Wilderness Acts and ANILCA to honor, protect and preserve such values. These values are both tangible, such as natural sounds, and intangible, such as wilderness values like solitude. The governing laws set a very high management standard: to manage parks so that the scenery, natural and historic objects and wildlife are left unimpaired for the enjoyment of future generations (Organic Act); or if Wilderness, the Act speaks of land which has outstanding opportunities for solitude or a primitive and unconfined type of recreation. The specific mandate of Section 203(a) of ANILCA requires management "to provide continued opportunities, including reasonable access, for wilderness recreational activities". (For the record, we note that though state government apparently fails to believe that NPS has the authority or obligation to protect intangible values, the Constitution of the State of Alaska recognizes that intangible values do in fact exist and are to be preserved and protected, as established by Section VIII which authorizes the legislature to acquire "areas of natural beauty".) AQRC also appreciates the emphasis this Plan places on the discussion and analysis of the natural soundscape as one of the Park resources to be protected.

We fully support a number of the premises and constraints adopted in the Plan. For example, we believe that this Plan successfully makes the case that the land contained in the Park and Preserve, for historical

Response to Comments

Comments

and legal reasons, is different from, and is to be managed differently than, the surrounding public lands where such values are not necessarily protected. We further note that about 3.7 million acres of the park additions and preserve have been deemed suitable, and of that amount, 2.25 million acres have been proposed to be recommended, for formal wilderness designation. Under NPS policy such lands are required to be managed in a manner which will not diminish their wilderness character or jeopardize their eligibility for formal designation. AQRC also finds very useful for our analysis, the framework for examining recreational opportunities in a wilderness park, set forth at pages 384-5, which categorizes recreational activities based on the degree to which the activities are "wilderness dependent". The Plan concludes that under this framework "Recreational activities that depend on wilderness conditions, such as experiencing solitude and isolation, observing natural ecological processes, or challenging oneself with wilderness travel" are most consistent with Denali's statutory guidance. It further concludes that snowmachine racing and highmarking fall into a different category, which is for activities which occur outdoors but do not need wilderness conditions.

The issue to be discussed in these comments is whether AQRC, after review of the Plan, finds that, the Preferred, or any other, alternative, provides a management framework which in the future will restore and maintain Denali National Park and Preserve as a wilderness park. AQRC does not believe that the Preferred Alternative provides management which satisfies both the legal and policy requirements of a wilderness park. In our opinion, the Preferred Alternative inappropriately attempts to accommodate activities which compromise the very wilderness values for which the Park was created and is required to be managed. For example, 11% of the lands are to be classified as Management Area A whose purpose is to "provide a diversity of opportunities for wilderness recreational activities that are relatively accessible to day users and to those who have limited wilderness travel skills or equipment". Is this the type of activity envisioned when Section 203(a) of ANILCA added the four million acres or appropriate in possible Wilderness or is this the type of activity which should be limited to the Frontcountry areas? In Management Area A, natural sounds can be "frequently disturbed" by motorized noise up to 25% of any hour and there may be up to 25 motorized noise intrusions per day that exceed natural ambient sound. The Preferred Alternative would permit snowmachining for "traditional activities", but the failure to define the term means snowmachining could occur anyplace at any time throughout the 4 million acres in the park additions and preserve. Indeed, 64% of the park additions and preserve would be open to snowmachining (p. 274) . which since the Old Park is closed, means that 64% of the park additions and preserve would be open to snowmachining. Moreover, in the event that Congress designated additional wilderness, the Preferred states that NPS would seek an exception (to the prohibition of any motors in Wilderness) to continue to permit recreational snowmachining in the designated Corridors.

AQRC supports the People for Parks Alternative which we believe provides the most protection of the wilderness and resource values of the Park.

Comments

We strongly support extending the existing definition for traditional activities currently in use for the Old Park to the 1980 Park Additions and Preserve. Section 1110(a) of ANILCA requires no more than to allow snowmachining for "traditional activities" and that activity is then further subject to reasonable regulations. As set forth in the analytic framework to determine wilderness dependent recreational activities, recreational snowmachining does not fall into the third category which the Plan indicates are the type of activities most consistent with Denali's statutory guidance. We contend that recreational snowmachining is, in fact, in conflict with wilderness values. The purpose of the "snowmachine corridors" set forth in alternatives 3, 4 and 5, is not to control or necessarily channel snowmachine traffic, but to inform snowmachiners and others using the corridors, or adjacent lands, of what to expect in terms of possible noise and presence of other parties. We see no way to preserve the wilderness values and resources of the Park, particularly its natural soundscape, except to prohibit recreational snowmachining in all areas of the Park. That traffic can be accommodated on the surrounding public lands which were not established with the same requirements to preserve wilderness values.

We strongly support the formation of an "Aircraft Overflights Working Group" and strongly recommend that group include representation of people, such as cabin owners, who are directly impacted by the noise of air tourism, though located outside of the Park boundaries. It has never been apparent to AQRc why those who built a cabin in the backcountry for the very purpose of experiencing living in the momentary experience, which is all facilitated by a public agency, of the flightseeing tourist. It well may be that voluntary measures will not work to preserve the Park values adversely affected by relentless overflights and in that case we recommend NPS seek legislation which would permit some limitations of overflights in order to protect the unique wilderness values of Denali. In turn, any limitations would help restore the opportunities for experiencing natural sounds by cabin owners now directly impacted by overhead flightseeing routes.

1
Whichever alternative is adopted, AQRc is very concerned about the ability of NPS to actually manage this plan. A Plan based on desired future conditions requires clear, quantifiable standards and conditions, a monitoring plan with specific timelines and an extensive monitoring and enforcement capability. Unless this can be guaranteed, this Plan should not be approved. The Final needs to address this concern explicitly and what NPS will do in the absence of adequate additional funding and staffing. There is no way to tell from the budget on page 520 whether the figures are adequate to support the additional monitoring staff and resources required since a cost analysis is not set forth. As a small, but essential, step, we suggest that the language in whatever alternative is selected be strengthened wherever possible by changing "shall" from "may" or "could", etc., in order to both inform the public as well as NPS staff as to the standard. We recommend, and strongly urge, that NPS set up a citizen's monitoring advisory committee to help develop a specific annual monitoring plan and priorities, provide oversight to the monitoring efforts and results and help gain

Response to Comments

AQRc-1

See NPCA-9 and NPCA-10.

Comments

public support for NPS's management efforts in Denali.

AQRC appreciates the emphasis this Plan places on the value of natural sound as an inherent natural resource of a national park-"they (natural sounds) are inherent components of the 'scenery and the natural and historic objects and wild life' protected by the Organic Act". The Plan further points out that due to the wilderness character of the Denali backcountry areas, human generated sounds which intrude on the natural soundscape, such as planes or snowmachines, are to be characterized as noise under NPS policy. We believe, however, that the standard set for "minimally acceptable resource conditions" for natural sound disturbance permits too much disturbance, reaches the level of impairment and fails to meet NPS's soundscape policy. For example, in Management Area A, the desired future condition is the standard of "High" which permits motorized noises to be audible up to 25% of any hour and up to 25 motorized noise intrusions (over natural ambient sounds) per day. The Plan does not consider this level of noise to be excessive; we disagree. We do not believe this amount of noise should be allowed in a wilderness park and recommend a standard of lower impacts throughout most of the management areas. While the Plan makes clear that most of the noise is caused by planes and thus out of NPS's jurisdiction to manage, NPS does have the option of prohibiting recreational snowmachining and limiting flightseeing landing (as advocated in the People's Alternative) in order to protect and restore the natural soundscape to the backcountry of this wilderness park. AQRC further takes issue with the Plan's conclusion on page 282 that "Natural sound disturbances do not represent permanent changes in park resources; however if plan actions allow indefinitely recurring seasonal disturbances the affects would be considered long term". This statement appears to address the sounds of a natural soundscape that are momentarily "masked" by the sounds of a machine, such as a plane, but why could not that noisy interval qualify as a permanent change? At what point does a long term impact become permanent? Does permanent mean forever or simply lasting beyond the life of the plan? Must an impact be permanent before it is considered to be an impairment? Is it not an impairment of the natural soundscape if for most of the life of the plan the natural sounds in X place no longer include certain animal or bird sounds due to displacement by recreational motors? The conclusion appears to say that if the soundscape at some point during the life of the plan can be restored, there can be no impairment. Under that "moving" standard, you could permit unlimited motorized recreational traffic in the Park additions and Preserve for years without finding impairment of the resource or having to take action since in the last year of the plan, you could prohibit snowmachining and restore the natural soundscape. We believe the Plan needs clearer standards throughout.

In summary, Denali National Park and Preserve is a backcountry wilderness park, mandated to be managed differently from surrounding state and federal public lands and obligated by law and NPS policy to protect the Park's tangible natural resources as well as its intangible values. To manage this park NPS must adopt strict and clear standards

Response to Comments

AQRC-2

See NPCA-16.

AQRC-3

The referenced text on p.282 in the *Revised Draft EIS* refers to definitions presented on p.212-214, which includes a definition for impairment. "Impairment" occurs whenever "a resource would no longer fulfill the specific purposes identified in the park's establishing legislation or its role in maintaining the natural integrity of the park." Both conditions are potentially true for the natural sound resource, and the National Park Service concluded that Alternative 1, the no-action alternative, would result in impairment of this resource. The conclusions regarding impacts to natural sounds in both the *Revised Draft EIS* and the *Final EIS* in no way assert that because natural sound could be restored at any time, then impairment could not occur. In fact, the analysis assumes that in locations where there is high demand for motorized access, noise levels would increase to the limits defined by standards. However, the NPS believes that this amount of noise would not impair the natural sound resource under the modified preferred alternative, although major adverse impacts would occur.

Comments

and indicators to accurately measure the impact of activities on the resources to be protect and then have the capacity and commitment to monitor the standards in such a way that NPS can and will have the political will to, through adaptive management, change direction in order to protect impacted Park resources. As written, however, this Plan erodes the very values it purports to protect by attempting to accommodate activities, such as recreational snowmachining, which have no place in a wilderness park.

Thank you for this opportunity to comment.

Sincerely yours,

Trisha Herminghaus, President

Alaska Quiet Rights Coalition

PO Box 202582

Anchorage, AK 99520

Response to Comments



THE AMERICAN ALPINE CLUB

LLOYD F. ATHEARN
DEPUTY DIRECTOR

July 15, 2005

Paul R. Anderson, Superintendent
Denali National Park and Preserve
PO Box 9
Denali Park AK 99755

Dear Superintendent Anderson:

On behalf of The American Alpine Club, I would like to respond formally to the revised draft Backcountry Management Plan for Denali National Park and Preserve that was released in late April. The BMP will have a tremendous impact on AAC members and other climbers worldwide who desire to climb the highest peak in North America, as well as the other significant peaks in the park. The AAC has shared its thoughts and suggestions during the scoping phase, at a January 2002 mountaineering workshop in Anchorage, and during the June 2003 comment phase on the original draft BMP. The AAC is encouraged to see the refinement of many concepts contained in the revised draft BMP, but also is concerned that significant flaws exist in the document we hope can be resolved before the final plan is adopted.

IMPACT ON AAC MEMBERS

The American Alpine Club, founded in 1902, is the premiere national organization representing the interests and concerns of American mountaineers and rock climbers. Since our inception we have worked to promote climbing knowledge, conserve mountain environments and serve the American climbing community. Beyond our work domestically, the AAC is the official representative of American climbers in the UIAA (Union Internationale des Associations d'Alpinisme), the International Mountaineering and Climbing Federation, an international representative body for climbers worldwide.

The AAC's current membership numbers about 7,000 individuals throughout the US and abroad, including more than 160 in Alaska. We also represent more than 40 climbing-related businesses that have joined our corporate membership program. Our members are frequent visitors to wilderness areas and National Parks, with members climbing an average of 74 days per year according to a membership survey conducted in 2000. That study showed that 33% of our members who live outside of the state have climbed in Alaska, while another 32% plan to do so within the next couple of years. (Denali National Park and Preserve likely was the primary destination due to its international reputation among climbers and great wealth of climbing objectives.)

MANAGEMENT GOALS

The AAC concurs with the general vision articulated on pages 10-11, which focuses on preserving the natural and cultural resources contained in the Old Park, park additions and preserve areas, as well as managing recreational opportunities that are "compatible with the unique resources and values for which the park was established." However, after thoroughly reviewing the document, we question whether the revised Backcountry Management Plan's preferred alternative will allow that vision to be realized, since it authorizes activities that are neither related to, nor compatible with the resources and values for which the park was established. Further, it appears that the revised BMP spends more effort accommodating popular, but questionably appropriate recreational activities than it does rectifying degradation to intended activities and preventing further resource degradation. The environmental analysis itself acknowledges that the

Comments

Revised Draft Denali Backcountry Management Plan
Comments of the American Alpine Club
Page 2

preferred alternative will provide "little overall mitigation for past actions" and will still allow "cumulative major adverse impacts" to wilderness resources and natural soundscapes."

For example, snowmachines and aircraft are clearly authorized under ANILCA to provide access for "traditional" and "subsistence" activities, as well as those purposes specifically mentioned in ANILCA like mountaineering and other "wilderness recreational activities." It is unclear, however, whether either activity is allowed for purely recreational purposes. (The draft BMP alludes to this in the response to State of Alaska comments near the top of page 440 when it cites that the Senate Report "guarantees access subject to reasonable regulations by the Secretary...for traditional or customary activities, such as subsistence and sport hunting, fishing, berry-picking, and travel between villages," but asks the State to provide examples from the legislative history showing that Congress intended "traditional activities" to include sightseeing, wildlife viewing and picnicking.) The BMP must, but currently does not, distinguish between the *method* of access and the *purpose* necessitating the access. We do not believe they are one and the same. This is an important distinction because both activities have grown significantly in recent years, and both contribute to significantly degraded wilderness character of the park: additions for the intended purpose of mountaineering and climbing. The preferred alternative neither rectifies past damage to natural soundscapes experienced by climbers, nor provides sufficient protection against further degradation. Thus, it is hard to see how the preferred alternative will achieve the general vision articulated in this section.

Beyond this overall concern about whether the preferred alternative will achieve the ambitious and appropriate general vision, the AAC is concerned very specifically that the "Objectives" listed on page 11 are incomplete because they do not properly acknowledge the need to protect and preserve the primitive, wilderness-dependent recreational opportunities established in the Wilderness Act and the specific purposes outlined in ANILCA for the park additions and preserves. The second bullet in this section should note the need to protect "opportunities for a primitive and unconfined type of recreation," which comes directly from the Wilderness Act's definition of wilderness. The BMP cannot claim that opportunities for wilderness "solitude" must be protected without simultaneously protecting opportunities for "primitive recreation" since both are found in the same sentence of the Wilderness Act. Further, ANILCA Section 202(3)(a) specifically lists as one of three principal management purposes for the park additions and preserve: "to provide continued opportunities, including reasonable access, for mountain climbing, mountaineering and other wilderness recreational activities." It is not appropriate to excerpt two components from the Wilderness Act and ANILCA—"wilderness character" and "opportunities for solitude"—without acknowledging that both documents also establish a third component: wilderness-dependent recreational activities, specifically climbing and mountaineering.

On a related point, the paragraph on the top of page 385 describing the methodology for determining appropriate recreational opportunities is not complete. The paragraph provides a clear description of the multi-tiered approach to determining which activities are dependent upon and appropriate for conditions established in the park's authorizing legislation. While examples are given for activities that do not depend upon and actually degrade wilderness conditions (snowmachine racing and high-marking) and activities that, while not wilderness dependent are enhanced by wilderness (scenic air tours), the paragraph provides no examples of the highest tier of wilderness dependency—those activities that actually depend upon wilderness conditions. The obvious example that should be included, but was not, is mountaineering on the natural features found only in the wilderness portions of the park. These features, including the high point in North America, simply cannot be replicated any place else in the world.

MANAGEMENT AREA DESCRIPTIONS

The AAC is pleased with the way planners have developed new management area designations for the revised draft BMP. We are particularly encouraged by development of management area "C" that provides for the unique needs and experiences of climbing and mountaineering expeditions in the southern park additions. One must recall that these additions to the park were made by ANILCA with a specific three-fold intent, one of which was to "provide continued opportunities, including reasonable access, for mountain climbing, mountaineering and other wilderness recreational activities." The initial draft BMP did not adequately reflect the unique status climbing was given by ANILCA in these areas, and establishment of a

Response to Comments

AAC-1

The National Park Service agrees that the *Revised Draft EIS* does not always specifically distinguish between the "method" and "purpose" of access. Usually it is very difficult to separate the two. For example, if a person is hiking in the Denali backcountry, is hiking the "purpose" in and of itself, or is it the means of transportation for wildlife and scenic viewing, wilderness experience, or ecological learning? Valid purposes for accessing the park and preserve are those specified in legislation for the national park and the National Park Service. Valid means of access are those that are consistent with resource protection and statutory and regulatory guidance. The modified preferred alternative for the most part relies on existing statutory and regulatory guidance for modes of access, which is outlined in chapter 1, without recommending specific new constraints. However, the modified preferred alternative also sets thresholds that define visitor experience goals and resource conditions the National Park Service seeks to protect in accordance with statutory purposes. If valid means of access do not threaten to exceed these thresholds, further action to manage the means of access would not be necessary.

AAC-2

The National Park Service agrees that providing wilderness recreational opportunities, including reasonable access, should be a stated objective of the plan and has amended the text of chapter 1 accordingly.

AAC-3

The National Park Service agrees with this criticism and has amended the page in question to provide some examples of wilderness-dependent activities.

Comments

Revised Draft Denali Backcountry Management Plan
Comments of the American Alpine Club
Page 3

management zone dedicated to these experiences helps identify how adequately the Park Service is protecting these intended activities from degradation in each of the action alternatives.

The “C”-zone descriptions generally provide good minimal acceptable resource and social conditions one would expect to find in these remote areas. Wilderness climbing like that found in Denali National Park is an activity that relies on intact natural environments. In contrast to many other park visitors, climbers do not expect that nature should be modified significantly to provide for comfort or convenience. Any modifications made by climbers (e.g. fixed anchor placements, construction of snow walls around tents, etc.) are minimal in scope, necessary for visitor safety and generally are not permanent. However, climbing has unique social factors that must be respected. For example, natural topography and hazards often necessitate that climbers camp within sight and sound of each other in basecamps or higher camps/bivy areas. Proximity to others is infinitely less significant to climbers than the safety of any camping area. Similarly, due to the wide open spaces above timberline and on rock faces, it is often possible to see and be seen by other climbers without interfering in their climbing experiences.

The seasonal West Buttress Corridor does a good job of setting up appropriate minimal acceptable resource and social conditions for this highly traveled climbing route. This zoning overlay has existed in other prior plans, but was focused largely on the maximum encounter level allowed. We fully support the move away from focusing solely on encounters with other climbers toward an approach that seeks to establish a broader range of natural resource and social conditions appropriate for a climbing route that has seen 87% of all climbing use on Mount McKinley over the last five seasons, and 92% in 2004.

The one issue where we have significant objections with the management area descriptions provided for zones “C” and the West Buttress Corridor involves the minimally acceptable conditions for natural sound disturbance. In both instances we believe the conditions listed are too high for these zones given the activities appropriate for them and the conditions allowed in other adjacent zones. For example, it does not logically follow that disturbance of natural sounds will be higher in zone “C,” which is tailored to people making long-term use of these backcountry areas for primitive, wilderness-dependent recreation, than is allowed in zone “B,” which is geared towards people making day trips or remote, self-reliant overnight trips. Nevertheless, zone “C” allows “high” disruption of natural sounds (up to 25% of each hour and 25 times per day), while zone “B” allows “medium” degradation of natural sounds (up to 15% of any hour and 10 times per day). Logic would dictate that degradation of natural soundscapes would be less in the zone focused on longer term, wilderness-dependent recreational pursuits since an absence of human-generated noise is more integral to the wilderness character of the lands being visited and the activities in which visitors are engaging.

The West Buttress Corridor provides a particularly perplexing example of this natural sounds standard. The principal landing site providing access to the West Buttress Corridor is located outside of the corridor itself in a “Portal-Major Landing Area” zone. This zoning designation allows for “very high” disturbance of natural sounds, which should provide allowance for noise associated with frequent air taxi takeoffs and landings. Once in the corridor itself, however, there are no landing areas and no need to have a high standard to cover aircraft takeoffs and landings—especially since natural features and the conventional takeoff and approach patterns shield the West Buttress Corridor from much of the aircraft noise at the landing site. Nevertheless, the minimally acceptable resource conditions allow for a “high” level of natural sound disturbance. This is curious given that the area over which the corridor designation is laid allows for significantly lower levels of soundscape degradation—in most alternatives the “OP1” zone calls for “low” natural sound disturbance, while the “B” zone in Alternative 5 calls for “medium” natural sound disturbance. It would be almost physically impossible given the configuration of the corridor to fly through the corridor without passing over the adjacent zones that have significantly lower levels of tolerance for disturbing natural sounds.

We have noted in the past that climbers tend to be viewed as an added “attraction” by scenic flight passengers. Recent studies have shown that scenic flight passengers tend to feel sighting climbers adds to the enjoyment of their trips. However, this added benefit for scenic flight passengers comes at the direct

4

5

Response to Comments

AAC-4

The preferred alternative of the *Revised Draft EIS* and the modified preferred alternative of the *Final EIS* both provide for the same natural sound conditions in Management Areas B and C. Both allow a “medium” level of natural sound disturbance that allows audible motorized noise up to 15% of any hour and a maximum of 10 motorized noise intrusions per day that exceed natural ambient sound.

AAC-5

The National Park Service agrees with this criticism and has amended the natural sound disturbance indicator on the West Buttress route to correspond with that of the surrounding area.

Comments

Revised Draft Denali Backcountry Management Plan
Comments of the American Alpine Club
Page 4

expense of degraded conditions and experiences for mountaineers on the ground. The National Park Service would not allow scenic flights to degrade natural conditions for wildlife just so passengers could obtain better views of these attractive animals. It is therefore unclear why it is acceptable to degrade the natural conditions enjoyed by human visitors in this particular corridor. The higher levels of natural sound disturbance allowed in the West Buttress Corridor almost seems to invite intentional aircraft overflights of the climbing route since the only activities occurring within the corridor itself that contribute to higher levels of sound disturbance are helicopter flights, which are related principally to exceptional rescue events and infrequent administrative flights over the course of the climbing season.

BACKCOUNTRY REGISTRATION

The AAC is generally supportive of registering backcountry visitors so the Park Service can obtain accurate statistics about visitor use patterns. Accurate statistics should allow for more informed decision making regarding visitor management. The lack of accurate information, however, continues to plague the revised draft BMP despite our noting the flaws in your data in the previous draft BMP. For example, Table 3-11 on page 174 (inaccurately referred to in the narrative on page 173 as Table 3-18) and the accompanying narrative on page 173 purport to show a "rapid increase in visitor use of Alaska Range destinations", other than Mount McKinley. NPS climbing summaries from past decades, while not fully comprehensive either due to their voluntary nature, refute this assertion.

These older summaries prepared by the NPS indicate that climbing use has been highly erratic, not consistently increasing, on virtually all of the peaks listed in Table 3-11. For example, more than 11 times the number of climbers attempted Mount Silverthorne in 1978 (24) and 1988 (25) than the recent eight-year average listed (2). Attempts on Mount Foraker exceeded the recent eight-year average (30) on 3 of 5 years in the first half of the 1980s. While climbing use on peaks other than McKinley has increased over the years, Table 3-11 appears to illustrate how incomplete user data viewed in isolation can provide inaccurate visitor use trends and result in potentially unneeded backcountry regulations.

Alternative 3 and 4 propose generally similar backcountry registration proposals affecting climbers in the southern park additions east of the Kahiltna Glacier during winter and for overnight trips. The difference is that Alternative 3 would immediately require registration affecting all overnight visitors throughout the park and preserve, as well as winter day-use visitors east of the Kahiltna Glacier. The preferred alternative, however, would impose the registration requirement only when user conflicts and/or resource degradation was noted. Alternative 4 also would lessen the scope of lands potentially affected by registration such that registration would apply principally to climbing and mountaineering in the areas east of the Kahiltna. activities that pose little threat to natural resources, wildlife or soundscape degradation. In fact, the principal impact of climbing comes from human waste, an impact that is directly addressed by enhanced pack-out requirements. Glaringly absent from your proposed registration requirements is the preferred alternative is any mention of requiring registration for recreational day-use snowmachine activities. This is a significant flaw because of the tremendous potential for harm to the physical resource, wildlife and natural soundscapes, as well as the potential for user group conflicts posed by largely unregulated snowmachine use in Alternative 4's zone "A" areas.

Our support for any backcountry registration system is predicated on several factors:

- Backcountry registration will be free.
- There will be no advance registration period like the 60-day requirement for climbing Mounts McKinley and Foraker.
- The park will utilize on-line registration, self-registration, or phone-in registration to the greatest extent possible so that registration is quick and easy for the backcountry visitor.

Climbers are highly dependent on weather and route conditions in determining the viability of a given route or peak attempt. Some routes are not reliably in condition, and climbers wishing to attempt them must be able to respond immediately when conditions are favorable. Advance registration requirements and

Response to Comments

AAC-6

The National Park Service agrees that data are incomplete for mountaineering use in the Alaska Range. Regardless of what happened in earlier time periods, the noticeable rise in use over the past few years in areas other than Mount McKinley has been accompanied by observations of resource impacts, such as large amounts of exposed human waste on the Pika Glacier. While the National Park Service also wishes to avoid unnecessary regulation, we agree that it could be important to obtain accurate visitor use data through registration in areas where resource impacts are occurring if other methods for obtaining this information would be ineffective.

AAC-7

The BCMP does commit the National Park Service to establishing convenient mechanisms for backcountry registration where it is required. The 60-day advance registration requirement and mountaineering fees for Mount McKinley and Mount Foraker are driven by conditions specific to those peaks, and are not anticipated to serve as a model for any additional registration requirements in mountaineering areas. However, decisions about fees or advance registration are implementation-level decisions that are not considered in this plan, but these concerns would be taken into account if new registration requirements were proposed during implementation.

Comments

Revised Draft Denali Backcountry Management Plan
Comments of the American Alpine Club
Page 5

registration delays can have a profound impact on climber safety and success by making climbers wait to attempt routes that may be in condition for only a very brief period of time.

COMMERCIAL SERVICES

It is important to recognize that National Parks, by regulation (36 CFR 5.3), are set aside as commercial free zones. Commercial activities, with few exceptions, must be specifically authorized by park management and must meet certain minimum conditions. As the revised draft BMP notes on page 56, NPS management policies require that the Park Service determine that: 1) the proposed commercial service is "necessary and appropriate" and cannot be achieved outside of the park boundaries, 2) that the provision of the commercial service will be provided "in a manner that furthers the protection, conservation, and preservation of the environment and park resources and values," and 3) the proposed commercial service will "enhance visitor use and enjoyment without causing unacceptable impacts to park resources or values."

The BMP on page 57 indicates that in park additions and preserve areas where the numbers of visitors are limited, guided or educational use would be limited to less than a majority of total potential use of the area. In the Old Park, guided and educational use would generally be less than 25% of the total potential use. While the BMP does not address this issue directly, AAC analysis of past NPS mountaineering reports finds that actual historic guided climbing use of Mount McKinley has averaged 29% of total climber use over 21 years dating back to 1978. (The number of commercial guides and clients is not reported in every year.)

Nevertheless, in no instance during this period did total commercial use exceed 25% of the proposed 1,500 climber cap proposed for Mount McKinley. The AAC views guided climbing use as a legitimate method of making this experience available to those who, for various reasons, are not able to arrange an independent expedition. We support this commercial use limit, but are concerned about the inclusion of the phrase "generally be less than" since it seems to provide a malleable cap that could be open to abuse in the future.

A significant concern exists in the area of commercial service provision for scenic flight glacier landings and the potential for commercial snowmachine access. The BMP does not articulate when and how a determination was made that scenic flight glacier landings meet the requirements set forth in NPS management policies for an allowed commercial activity. The methodology articulated on page 385 of the BMP notes that scenic air tours "are appropriate in Denali's backcountry because the wilderness setting enhances them, but they do not require wilderness." This seems to conflict with the standard required to authorize a commercial service in the park, which requires that the activity *cannot* be achieved outside of the park. The activity also seems to conflict with the requirements that the commercial use not cause "unacceptable impacts to park resources or values" since the rapid growth in scenic flight glacier landings has been principally responsible for the degradation of natural sounds—especially in areas adjacent to major landing areas. Finally, the BMP seems to leave open the opportunity for other commercial activities not specifically listed in the BMP within management zone "A." One could read into this that commercial snowmachine trips could be authorized in these areas of the park additions. Clarification on these points in the final BMP will be important to ensure that commercial activities are limited to those activities that are truly appropriate and do not conflict with park resources and values.

CLIMBING-SPECIFIC REGULATIONS

The AAC is pleased with the climbing-specific regulations contained in the revised draft BMP. Over the past four years an open exchange of information has occurred between the AAC, park planners and park managers, such that the plan contains pragmatic, well-reasoned and defensible approaches to managing climbing use in Denali National Park and Preserve. There is little we would seek to change in the following areas:

1. Mount McKinley Seasonal Capacity

As we noted in the 2003 draft BMP, the AAC believes that the number of people climbing Mount McKinley has flattened substantially and that it is unlikely that demand will exceed the 1,500 climber seasonal limit proposed in the plan. Even in the current season where a devalued U.S. Dollar increased the number of foreign climbers on the mountain, use increased only slightly above the previous all-time high of 1,305 climbers set in 2001 (Chart 1). The seasonal average for climbers on Mount McKinley has not changed

Response to Comments

AAC-8

The phrase was changed in the modified preferred alternative to remove the malleability of the allocation between guided and non-guided uses.

AAC-9

The two standards do not conflict. Although scenic air tours do not require wilderness, they do require access to the mountains and glaciers of the Alaska Range and Mount McKinley, which cannot be achieved outside of the park. The point of scenic air tours – particularly the authorized commercial landings – is to provide visitor experience and interpretation about these park resources that are specifically identified in legislation. The standards articulated in the plan are designed to prevent unacceptable impacts to park resources and values while still allowing a level of visitor use, including necessary and appropriate commercial services. Management Area A does allow new types of commercial services, but any such new service would still have to be "necessary and appropriate" and meet the other criteria described in the Commercial Services portion of this plan.

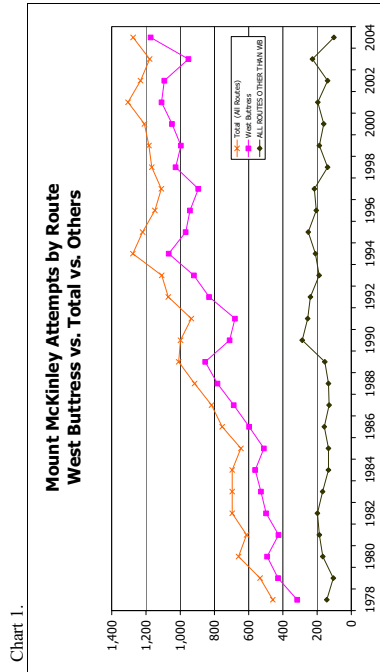
8

9

Comments

Revised Draft Denali Backcountry Management Plan
 Comments of the American Alpine Club
 Page 6

significantly over the past 15 years—1,268 for the past five years, 1,216 for the past decade and 1,185 for the past 15 years. Use has been relatively flat over this period, and we do not expect this use to change based on overall demographic and visitor use trends affecting the broader outdoor industry.



Beyond this overall flat trend in climbing use on Mount McKinley, the other important trend is a growing concentration of climbers on the well-managed West Buttress route. This means that any increase in climbing use would be assumed to be taking place on a route that can accommodate the use and that is heavily patrolled by the NPS climbing rangers.

2. Management of Fixed Climbing Anchors

The AAC supports the prohibition on the use of power drills throughout the park additions and preserve, an action that is in keeping with the wilderness character of these lands and one that will prevent widespread proliferation of fixed anchors. The proposed policy for fixed and removable anchors will ensure that these climbing tools—which are historic and necessary wilderness climbing tools—remain available to climbers for use in appropriate situations, but also will work to limit any excessive or inappropriate use. The policy proposed on pages 55-56 has been used successfully for several years at Rocky Mountain National Park, and it resembles the approach being proposed as a national policy for use by the four federal land management agencies in their wilderness areas.

3. Human Waste Management

The AAC was an early supporter of efforts to remove, as much as is practical, human waste generated by climbers in these high alpine zones where biodegradation is not possible. The AAC provided grant funding to develop the initial prototype “Clean Mountain Can” canisters, and provided a second grant to provide an adequate supply for initial field testing. Beyond merely providing funding, the AAC provided staff assistance to help test the canisters and then heavily promoted their use in Club publications and broader climbing industry magazines. In light of the recent epidemiological study regarding gastroenteritis outbreaks among climbers on the West Buttress route¹, we believe effective management and removal of human waste is of paramount importance to protecting the natural resource, as well as the health of climbers in the park and preserve.

Initially, the CMCs were designed to remedy human waste problems at the 17,000-foot camp where on-site disposal poses the greatest problems. We support the requirement that canisters will be required at and

¹ J.B. McLaughlin, B.D. Gessner, A.M. Bailey, “Gastroenteritis Outbreak Among Mountaineers Climbing the West Buttress Route on Denali—Denali National Park, Alaska, June 2002,” *Wilderness and Environmental Medicine*, 16, p. 92-96, 2005.

Comments

Revised Draft Denali Backcountry Management Plan
Comments of the American Alpine Club
Page 7

above the 14,000-foot camp on the West Buttress route, as well as within 0.5 miles of glacier landing sites in other parts of the park. The AAC also believes that use of CMCs and removal of waste is feasible in areas on the West Buttress below the 14,000-foot camp where sleds are used, and we very much support the Park Service facilitating this environmentally beneficial practice. Nevertheless, we wish to emphasize that the current configuration of the CMCs makes them too big and bulky for use on more technical climbing routes. We do not want to see this protocol required in such areas where their use could pose a safety hazard to climbers.

10
The revised BMP is confusing regarding the overlap between the new human waste removal policy and the current policy (2004 Superintendent's Compendium), which the BMP notes would remain in place. Specifically, will CMCs be used exclusively at Kahiltna Base Camp since it is a campsite within 0.5 miles of a glacier landing site, or does the NPS intend to use the customary latrine as is noted in the current policy? This potential conflict needs to be clarified in the final BMP.

4. West Buttress Corridor

The AAC fully supports establishment of the seasonal West Buttress Corridor as a means of allowing the current high level of primitive recreational use occurring on the route. We do not believe that existing use on the West Buttress route violates any Congressional intent regarding wilderness solitude, but this special corridor sets appropriate expectations for the social conditions experienced on the route. As we have pointed out in prior communication, unique natural factors associated with travel in glaciated alpine terrain, such as crevasses and avalanche run-out zones, dictate that climbers travel and camp in established areas that concentrate use more than would occur in other areas of the park and preserve. The BMP must acknowledge and respect this unique aspect of mountaineering.

NATURAL SOUNDSCAPE PROTECTION AND RESTORATION

NPS Director's Order #47 clearly states that natural soundscapes are intrinsic elements in the park environment and are to be protected no less than wildlife or other natural resources. The NPS is directed to protect, maintain and restore the natural soundscape resource "to the fullest extent possible" to a condition "unimpaired by inappropriate or excessive noise sources." The directive mandates that soundscapes be protected if they are not currently impaired, and in the case of impaired soundscapes, they are to be restored "to the level consistent with park purposes, taking into consideration other applicable laws."

11
The revised draft BMP documents that aircraft in flight and during takeoff currently are degrading the natural soundscape for backcountry visitors in the park and preserve. The EIS portion of the revised draft BMP indicates that most sound sampling data would violate all but the most tolerant proposed standard most of the time in many of the sampling locations—particularly those in the high alpine zones where lack of vegetation prevents attenuation of these unnatural sounds. Thus, the question for the BMP's forward-looking policy must be how to restore the degraded soundscape, not how additional degradation can occur through new and expanded uses causing soundscape degradation, such as allowing recreational snowmobile activity throughout a wide swath of the southern park additions. It is particularly disturbing to see that the draft BMP proposes allowing this significant soundscape degradation to continue for five years of further study before commencing any enforcement action. The Park Service is required to manage these wilderness-suitable lands to protect their wilderness character, but the draft BMP notes on page 312 that unchecked aircraft and snowmachine noise would impair the wilderness resource and possibly make these park additions unsuitable for wilderness designation. Clearly, waiting a further five years before taking action is wholly unacceptable and would lead to significant further degradation of natural soundscapes and wilderness character.

Given the mandate in Director's Order #47 to restore degraded soundscapes, it is shocking that the Park Service would put forward a plan that allows some backcountry areas to have degraded soundscapes up to half of any hour in the day and up to 50 motorized noise intrusions a day. This could translate into more than two motorized noise intrusions every hour throughout a 24-hour period, or more than four intrusions every hour if use occurs primarily within a 12-hour period. Even more shocking is the fact that Table 4-1 on page 283 indicates that this absurdly high standard would have been violated in the Ruth Amphitheater

Response to Comments

AAC-10

The modified preferred alternative clarifies that if a pit latrine is provided at a landing area then CMCs are not required.

AAC-11

Successful implementation of the Visitor Experience-Resource Protection planning model – of which indicators and standards are a part – requires the use of accurate information. The National Park Service recognizes that more information is needed before full implementation could occur, and believes that 5 years is sufficient time to gather data to share with the public. Although environmental analysis concluded that the natural sound resource would be impaired within the 20-year life of the plan if no action is taken, the National Park Service does not believe that would be the case within 5 years, particularly given other proactive measures in the plan such as addressing overflights through the Aircraft Overflights Working Group and limiting the geographic area available to scenic air tour landings.

Comments

Revised Draft Denali Backcountry Management Plan
Comments of the American Alpine Club
Page 8

more than 57% of the days based on sound sampling performed for seven days during July 2002. One expects degradation of soundscapes at this level at an urban airport, not well inside the boundary of one of the largest wilderness parks in the United States.

The AAC is aware that some may minimize the impact of degraded soundscapes to park visitors. Skeptics may say that the noise is only transitory and leaves no permanent impact on the landscape. However, for a climber or backcountry skier who invests a significant amount of time and resources to experience the Denali backcountry, the temporary disruption is all they will experience. The soundscape degradation will occur during their entire visit, and in some places like the Ruth Amphitheater, it will last for more than half the hours they are visiting the park. These factors effectively make the intrusion permanent. The skeptic's argument is analogous to saying that trampling of summer wildflowers is only temporary since it only occurs during a brief window when visitation occurs. This brief window of plant activity, however, is the only period during the whole year when the wildflower is not dormant. Since Director's Order #47 makes natural soundscapes equivalent in importance to natural and wildlife resources, we find it hard to believe the NPS would put forward a plan that allows half of the wildlife in the park to be harmed or half the vegetation to be trampled. Given the park's own policies, soundscape degradation of this magnitude cannot continue and restoration must begin immediately.

The revised draft BMP dances around the root cause of this soundscape degradation—tremendous growth in scenic flight traffic. The BMP is conspicuous in the omission of data reporting the number of overflights that do not land in the park. One suspects, however, that they exceed the number of flights that include glacier landings. Even when looking at the flights that do land on glaciers, which must be reported to the NPS, one finds wholly incomplete data showing long-term trends. Tables that are included indicate that the vast majority of flights and the most significant area of growth over the past six years are attributable to scenic flights, not air taxi landings. As table 3-16 notes, scenic flights that land on glaciers represented 67% of all aircraft that landed on glaciers in the park between 1999 and 2004. Further analysis of Table 3-16 shows that between 1999 and 2004, total air taxi flights declined by 7% despite carrying 17% more air taxi passengers into the Denali backcountry. Meanwhile, total scenic flights that land on glaciers increased by 20% and transported 47% more passengers. (As a means of comparison, climbing use on Mount McKinley—which the BMP felt needed to be capped to prevent excessive growth—increased only 8% during the same period.) Given the recent significant increases in primarily scenic flights driven by the influx of cruise ship passengers, one suspects that scenic flight glacier landings have increased at a significantly more dramatic rate than climbing use on Mount McKinley. Clearly, degradation of natural soundscapes has occurred primarily through increased scenic flights, a factor that is not addressed adequately in the draft BMP and must be rectified in the final BMP.

Though aircraft currently pose the greatest degradation to existing soundscapes, the potential for incursions by snowmachines is also quite concerning. As the draft BMP notes, snowmachines are already entering the southern park additions, and the concern is that more powerful snowmachines will allow riders to expand the area of the park that is subject to snowmachine noise and pollution. The fact that snowmachines have proceeded past the icefall, through the Ruth Gorge and into the Don Sheldon Amphitheater raises serious concerns that snowmachines will soon be a major new source of soundscape degradation in many areas that historically have been used solely by climbers if they are not tightly controlled. Given the broad area designated as zone "A" in the preferred alternative in which purely recreational snowmachine use will be allowed, only terrain and technological limitations will forestall climber/snowmachine conflicts at the Kahiltna Base Camp, the Ruth Gorge and Amphitheater, and many other popular climbing destinations in the southern park additions.

Soundscape preservation may be an esthetic concern to most wilderness and backcountry visitors, but to climbers it is also a significant safety issue. Climbers rely on voice commands to communicate with their partners. Sometimes partners may be more than 165 feet apart—often vertically—where communication is difficult even with only the background noise of wind, rockfall, and avalanches. The duration and intensity of soundscape intrusions can create hazardous situations in which a climber cannot communicate with his/her partner. When coupled with the fact that most scenic flights fly over the Ruth Glacier, the Kahiltna

AAC-12

Response to Comments

Any soundscape degradation, whether it is considered transitory or permanent, is of concern to the National Park Service. However, as long as the resource is not impaired the National Park Service can allow some degradation to accommodate visitor use. Although standards in the Ruth Glacier Special Use Area do allow natural sound disturbance up to 50% of any hour, this area comprises a small fraction of the area of the park and preserve for a 5-month season. Because the modified preferred alternative calls for restoration of the natural soundscape over the Denali Wilderness, allows very high levels of natural sound disturbance over only a small portion of the park additions, and limits the disturbance even in that area, the National Park Service concluded that impairment would not occur. As a result, the actions of the modified preferred alternative are within the National Park Service's legal and policy authorities. This conclusion would hold whether the described impacts are characterized as "temporary" or "permanent." The one place where the characterization of "permanent" could conceivably make a difference is in the evaluative tool used to determine an impact level of negligible, minor, moderate, or major. The cumulative adverse impact to natural soundscape is already determined to be "major."

AAC-13

The National Park Service agrees that the growth of scenic air tours are a primary reason for the degradation of natural soundscapes at Denali and that they have increased at a much faster rate than climbing and mountaineering activity in the Alaska Range. The data cited by the comment appears in chapter 3: Affected Environment of the *Revised Draft EIS* and supports these assertions. No additional data are available concerning scenic air tours that fly over but do not land at Denali, so the National Park Service cannot make specific conclusions on this subject. Nonetheless, the cumulative impacts analysis does appropriately highlight the role of scenic air tours in increasing motorized noise at the park, concluding the following:

Denali National Park and Preserve has become a noisier place since the park expansion in 1980. Aircraft are primarily responsible for increased natural sound disturbance, particularly the expansion of scenic air tours since the late 1980s, which produce much of the existing motorized noise over the eastern portion of the Old Park, around Mount McKinley, and along the south side of the Alaska Range between the Kahiltna and Eldridge Glaciers.

response continued next page

12

13

14

Comments

Revised Draft Denali Backcountry Management Plan
Comments of the American Alpine Club
Page 9

Glacier, the West Buttress, and the summit of Mount McKinley—all terrain used principally by mountaineers—the soundscape impacts on climbers exceed those for other park visitors. These safety concerns related to soundscape degradation are not discussed in the revised draft despite being raised by the AAC two years ago. They need to be addressed in the final BMP.

The AAC believes Alternative 3 strikes the best balance between soundscape preservation and recreational access. Alternative 3 will allow air taxis to land throughout the park additions and preserve, which will continue access to current climbing areas and the potential to provide access to future climbing areas. The prohibition on scenic flight landings between 9 p.m. and 9 a.m. will lessen the most intrusive noise impacts for backcountry visitors camped at or near landing areas during half the day when people are generally sleeping. The prohibition on landing at the Kahiltna Base Camp prior to July 1 of each year will minimize conflicts between climbers and sightseers. As the BMP notes on page 373, these combined restrictions would have affected only 10% of scenic flight landings. Given the fact that even the most tolerant soundscape standards will require shifting use out of the Ruth Amphitheater, these restrictions will ensure scenic flight landings do not overrun other climber destinations in the southern park additions as already occurred in the Ruth Gorge and Amphitheater. Prohibitions on recreational snowmachine use will virtually guarantee that there are no future user conflicts between climbers and snowmachine operators in historic climbing terrain.

Unfortunately, there is little in Alternative 4 that will restrict future growth in soundscape degradation through aircraft and snowmachine use. The BMP notes on page 376 that “Businesses providing scenic flights could therefore be expected to experience steady growth in income from this activity during the near future and throughout the 20-year life of the plan.” If soundscape standards in one major landing area are exceeded, tour operators need only scout a new location within the “A” zone. The only exception is the restriction on landing scenic flights at the Eldridge and Pika Glacier landing areas when climbers are present. Otherwise, scenic flight operators could pioneer glacier landing areas within the expanded Ruth Glacier Special Use Area and the “A” zone limited only by topography and conditions of the glaciers. Similarly, allowing recreational snowmachine access throughout the “A” zones will mean potential user conflicts wherever technology and terrain allow visitors to travel. The effect will be to give motorized users preference to these remote backcountry areas over climbing and other wilderness-dependent uses that were a reason for protection of these areas in the first place.

VISITOR USE AND EXPERIENCE

Aircraft access to the park and preserve is a double-edged sword. Due to the great distances, harsh terrain and length of time needed to approach climbing objectives by foot, aircraft are the principal means of access to the Alaska Range. However, scenic flights and glacier landings have grown dramatically over the years to the point that they now dominate all air travel over the park. Because aircraft noise currently is the greatest contributor to degraded soundscapes, the AAC believes the NPS must refocus management regulations contained in the BMP on the purposes for which Denali National Park and Preserve was established. If soundscape protection standards necessitate limits on use, preference should be given to uses that were listed by Congress as reasons for establishment of the park or its additions and preserve areas rather than uses that were not specifically intended and may not even be appropriate.

Facilitating mountaineering access was the catalyst for pioneering flights into the Mount McKinley area, first with a landing in 1932 on the Muldrow Glacier, then with the establishment of commercial flights from Talkeetna to the Kahiltna Glacier in 1954. Ferrying mountaineers was the mainstay of flight services for many years, but they eventually discovered that there were far more tourists desirous of a 90-minute scenic flight over the Alaska Range than there were climbers wanting to embark on multi-day climbing expeditions. The explosive growth in scenic flights over the last few years has been fueled in large measure by the package tour and cruise ship industry that brings in ever larger numbers of visitors to the park. As the draft BMP notes, new hotels in adjacent communities built to serve the package tour business portend even greater numbers of tourists who will seek to experience Denali National Park and Preserve largely by scenic flights.

Response to Comments

Since the cumulative impacts analysis concludes that major adverse impacts have occurred to natural soundscapes and that aircraft, particularly scenic air tours, are primarily responsible, the National Park Service believes this point was adequately addressed in the *Revised Draft EIS* and *Final EIS*.

AAC-14

Safety has been added as a topic of concern for the Aircraft Overflights Working Group, which can include both safety for aircraft and passengers as well as safety for mountaineers on the ground. The National Park Service does not have any reports of aircraft noise drowning out belay commands, and so was unable to address this concern in any greater detail.

AAC-15

The plan establishes limits for soundscape degradation through the expressed standards, and identifies the tools the National Park Service would use to enforce those limits. Additional growth in air tour business could come at least in part through heightened efficiency of passenger seating and use of the areas available. For instance, the move to larger planes and more complete use of seating on each flight allowed the concessioners to collectively increase passenger volume by about 1,300 people, about 11%, from 2000 to 2004, while actually decreasing the number of glacier landings from 3,117 to 2,880. The National Park Service remains concerned about the volume of airplanes continuing to rise over time and spreading to presently unused portions of the range. In 2005, the number of landings reached 3,223 and record numbers of landings were reported on both the Pika and Eldridge glaciers. However, given the carrying capacity restrictions in the modified preferred alternative, the National Park Service anticipates the scenic air tour business will have a strong incentive to continue finding efficiencies and finding ways to decrease impacts (for example, use of quiet technology) in order to allow for continued business growth.

Comments

Revised Draft Denali Backcountry Management Plan
Comments of the American Alpine Club
Page 10

The AAC is aware of the limited powers the NPS has to manage scenic flights that do not actually land in the park. We support your efforts to provide scenic flight operators with management designations of the park and encourage them to route flights over the appropriately designated zones. We also support the establishment of an overflight advisory committee, but request that at least one mountaineering organization be a part of that committee. Climbers are probably the most significantly affected visitor group in the park from overflights and glacier landings, since the routes generally chosen fly over the most dramatic climbing terrain and the summit of McKinley, and the landings occur almost exclusively in landing sites adjacent to major climbing base camp areas. Though not specifically listed in the draft BMP, the AAC would like to see greater emphasis placed on achieving the soundscape goal of Director's Order #47 to "reduce the noise level consistent with the best technology available." Scenic flight operators should be encouraged through incentives to adopt the best technology available for their planes, and use of best available technology should be required of concessionaires who are allowed to land in the park. This would not lessen the number of overflights that visitors see, but it would lessen the degradation of soundscapes.

Though both air axis and scenic flights degrade the natural soundscape, the AAC believes there is a major distinction between the two. The former is a means of access for people who endeavor to experience the mountain environment in its purest form. ANILCA specifically listed mountaineering and wilderness recreation as purposes for the park addition and preserve areas, and it allowed for "reasonable access" to these areas, which we interpret as aircraft access. As the revised draft BMP notes, the average climber on Mount McKinley stays 17 days, so flights in and out are small intrusions on the natural soundscape relative to the length of time these visitors will spend in the backcountry. In contrast, the average scenic flight passenger spends 90 minutes flying over the park—two hours if a glacier landing is involved—and essentially all of the time is spent in the plane. Assuming a total of three hours is required to fly in and fly out a McKinley climber, that person damages the natural soundscape for a less than 1% of the climber's visit, while the scenic flight passenger damages the natural soundscape for almost 75% of his visit.

PREFERRED ALTERNATIVE

After considerable review, the AAC rejects the Park Service's endorsement of Alternative 4 as the preferred alternative. As your own analysis notes, Alternative 4 will not address past degradation of wilderness character and natural soundscapes, and it provides little protection against future degradation of these and other natural resource conditions. We believe it is untenable for the Park Service to endorse an alternative that it acknowledges will not meet the goals and objectives set forth for the management plan.

The AAC believes Alternative 3 provides the best protection of the natural resources, social conditions and settings in which intended, wilderness-dependent recreational activities can occur over the 10-20-year anticipated lifespan of this Backcountry Management Plan. Listed below are some of the reasons the AAC believes Alternative 3 is far superior to Alternative 4 in meeting the goals and objectives established in the BMP.

- Alternative 4 allows recreational snowmachine access throughout all areas contained in management zone "A," and designated access corridors. This would allow snowmachines to gain access to most of the established climbing and mountaineering areas noted in Map 2-6, which would provide further degradation to wilderness conditions required for climbing. In contrast, Alternative 4 only allows snowmachine use for "traditional" and "subsistence" purposes.
- Alternative 3 protects a more balanced allocation of management area zones providing a broader array of recreational uses appropriate for the purposes set forth in Denali National Park and Preserve's authorizing legislation. Specifically, Alternative 3 protects 33% of the park addition/preserve lands for extended expeditions where other parties and signs of civilization are generally not encountered, while Alternative 4 protects no lands with this as a goal. Similarly, Alternative 3 zones roughly 50% more lands for primitive climbing and mountaineering experiences—one of three reasons Congress protected these lands initially—than does Alternative 4.
- The areas protected in zone "C" under Alternative 4 do not in any way correlate to areas possessing current, historic or potential significant climbing destinations; the designation appears

Response to Comments

Comments

Revised Draft Denali Backcountry Management Plan
Comments of the American Alpine Club
Page 11

to be placed over those areas that are not viewed as desirable for scenic flight purposes. Of the nine "popular climbing and mountaineering areas" listed on Map 3-4, only three (Little Switzerland/Pika Glacier, Rampart Mountains, and Eldridge Glacier) appear to be contained by zone "C" designation in Alternative 4. In contrast, Alternative 3 appears to add the Moose's Tooth (Buckskin Glacier area), Mount Hunter, and the Kahilna Base Camp to those areas protected by this zone, though it appears the Rampart Mountains would drop out into the less protective zone "B." Though Alternative 3 is preferable to Alternative 4, even here it does little to protect the popular climbing areas between the Ruth Special Use Area and the wilderness boundary that should be protected for their wilderness climbing characteristics.

- The seasonal Ruth Glacier Special Use Area, which accommodates intensive use by scenic flight trips, is significantly expanded in Alternative 4. In contrast, the area in Alternative 3 is more closely matched with areas currently used by flight services.
- Alternative 3 provides reasonable restrictions on the hours scenic flights may fly and contains safeguards that lessen the impact of scenic flight glacier landings on those areas used primarily by wilderness-dependent mountaineers. A seasonal restriction would reserve the Kahilna Base Camp glacier landing strip for air taxi access through the end of the customary climbing season, and would prohibit landings between the hours of 9 p.m. and 9 a.m.—not an academic concern given the near constant light during the tourist and climbing seasons.

In short, Alternative 3 focuses regulations so that they provide reasonable future growth for activities that are consistent with the park's intended purposes as expressed by Congress, but would seek to restrain inconsistent activities that are proving to be detrimental to park resources and values.

CONCLUSION

The AAC is conflicted by the revised draft Backcountry Management Plan. The overall vision is laudable, but simply cannot be achieved based on the timid management actions proposed by the BMP.

Mountaineering, a congressionally intended activity that was specifically listed as a reason for designating the park additions and preserve areas, is the only activity requiring advance permitting. Despite flattening of use over the last half-decade, climber levels on Mount McKinley will be capped, and registration is likely to be expanded to other areas to monitor climbing use. Mountaineering causes effectively no impact on the physical park resource beyond the disposal of human waste, which the BMP intends to lessen through a detailed pack-out program. Attention is placed on the tools allowed for climbing and the social impacts climbers have on each other, though neither has an appreciable impact on other park visitors or natural resources.

Meanwhile, the BMP is largely silent regarding the rapidly growing threat posed by scenic flights and snowmachines, both of which are growing rapidly and cause significant degradation of natural soundscapes, harassment of wildlife and, in the case of snowmachines, cause significant impacts to soils, plants and water sources. Little analysis is included about the rapid growth of both activities, and the few tables that contain such information is not analyzed in much detail. Neither use was specifically intended by Congress for either the "Old Park" or the park additions and preserve areas, and there is some question about whether these activities can be allowed legally. Yet, the revised draft BMP's preferred alternative will set aside almost three-times as much area in the park additions and preserve areas to accommodate these non-conforming uses as is set aside to accommodate wilderness-dependent climbing.

The AAC is troubled that the preferred alternative will not achieve the overarching themes contained in the BMP's goals and visions, does little to rectify past degradation of natural soundscapes and wilderness character, and provides scant protection against further degradation to physical and social resources and values of Denali National Park. We believe the preferred alternative will impair the resource, and recommend that the final Backcountry Management plan adopt Alternative 3 as a more reasoned, effective means of ensuring the park's viability for the next 10-20 years.

Comments

Revised Draft Denali Backcountry Management Plan
Comments of the American Alpine Club
Page 12

Please do not hesitate to contact me should you have any questions or concerns regarding the points raised in this letter.

Regards,



LLOYD F. ATHEARN
DEPUTY DIRECTOR

Response to Comments

Comments

Response to Comments

Comments and support materials also sent via regular mail.

July 5, 2005

Superintendent Paul Anderson
Denali National Park
PO. Box 9
Denali Park, AK 99755-0009

RE: Comments on Revised Draft Backcountry Management Plan for Denali National Park and Preserve

Dear Superintendent Anderson:

On behalf of Bluewater Network -- a division of Friends of the Earth, and the countless concerned citizens we represent I respectfully submit the following comments on the Park Service's (NPS) revised draft backcountry management plan (RDEIS) for Denali National Park and Preserve.

Bluewater Network appreciates the time and effort that went into the plan. We fully support the NPS desire to bring its backcountry management into compliance with recent legislative mandates, visitor patterns, and new recreational technologies. The RDEIS is a step in the right direction. Bluewater Network supports the "People for the Parks Alternative: A Better Future for Denali" because it best protects park resources while permitting appropriate recreation activities and visitor services. We urge the NPS to adopt this alternative.

Issues that Need More Attention

Previous Comments

First, we ask that all comments Bluewater Network has submitted on previous versions of this backcountry management plan be included in the RDEIS official record. A copy of those comments is enclosed.

In addition, we provide the following information to provide a proper context as well as counter some incorrect information so that the NPS may better judge its current alternatives against the "Better Future" alternative. Specifically we draw the NPS attention to the following: the Organic Act compliance of its preferred alternative, Alaska's interpretation of federal law such as ANICLA and the Wilderness Act, the non-traditional use of off-road vehicles such as ATV and snowmobiles, and climate change.

Organic Act Compliance

Bluewater Network is concerned that the RDEIS does not comply with the legislative mandates contained within the Organic Act and its amendments. The Organic Act

Comments

1 requires the NPS to leave park resources and wild life under its care “unimpaired” for the enjoyment of present and future generations. Unfortunately, the preferred alternative does not meet this requirement. In fact, the NPS admits on page 25 of the RDEIS that unless the agency receives staffing and funding increases – which are unlikely occurrences -- “it would not be possible to prevent impairment of park resources values given increases in visitor use.” To wit, Denali’s 2004 budget was down \$262,000 from the previous year. Despite the decreased budget, 2004 visitation was actually up roughly 20 percent from last year, placing increased demand upon already tight NPS resources. We fear that adopting alternative four is an unwarranted leap of faith by the Park Service and will only make matters worse, ultimately leading to the impairment of park resources, wild life, and values.

ORV and Snowmobile Use

2 On page 27 of the RDEIS the NPS states that off-road vehicle (ORV) operation and snowmobile access in the old park was considered but is not addressed in this plan. If we understand the NPS correctly, this means that plans and regulations addressing these uses will not be promulgated for the old park. We support these decisions. However, we urge the NPS to address ORV and snowmobile operation on park lands outside the old park. Specifically, we ask the NPS to follow New York State’s lead which is finalizing policy to eliminate the recreational use of thriллерcraft such as all terrain vehicles (ATV) on state lands. Specifically, the state’s draft ATV policy states that New York will not “encourage ATV use on [state] lands.” However, the state recognizes that ATV can be used as “means” to access other activities such as hunting, fishing, camping, hiking, etc. In other words, the recreational use of ATV will be prohibited. The state is adopting this new plan in order to address the “critical” and “impending impacts of public ATV access.”

Alaska Interpretation of ANICLA

Next, the NPS is giving too much weight to Alaska’s May 30, 2003 comments on the 2003 Draft Backcountry Management Plan. First, the state’s interpretation of the Alaska National Interest Conservation Lands Act (ANICLA) is seriously flawed. In particular, Alaska asserts that ANICLA section 1110(a) requires that NPS to show damage to “real” resources before it can restrict access. Moreover, the state implies that those resources do not include immeasurable, intangible aesthetic values and experiences such as soundscapes. However, ANICLA does not place any limits on the NPS’ ability to define the resources and experiences it is required to protect. Rather it states the Secretary can prohibit an activity if it damages “the resource values of the unit or area.” If Congress had meant to limit protection to what the state defines as “real” resources it would have explicitly stated such in the law. It did not. Rather, Congress requires the NPS to protect the area’s “resources values” which clearly includes the protection of non-tangible and more esoteric resources.

Along with a questionable reading of federal law, the state asserts that federal regulations require a factual determination of impact “on tangible, measurable resources of the unit as part of the rulemaking process.” The state appears to have made this requirement up out of whole cloth, for 43 CFR Part 36.11(h) merely restates the ANICLA requirement

Response to Comments

BN-1

See NPCA-9.

BN-2

Statute and regulation already appear to provide the necessary emphasis on utilitarian usage of off-road vehicles and snowmachines. Generally, ORVs are only permitted in the Denali backcountry where traditionally employed for subsistence purposes. Some owners of land within park boundaries are also permitted to use ORVs by Section 1110(b) of ANILCA for access to their land. The use of snowmachines is allowed “for traditional activities” and “for subsistence purposes.” See the discussion in chapter 1, Applicable Laws, Regulations, and Policies. Also, see NPCA-18 and TWS-16.

Comments

Response to Comments

BN-3

The impacts of climate change are outside the scope of the backcountry management plan, which is only a limited General Management Plan amendment that primarily addresses visitor use in the park backcountry.

that closures be based on impacts to “resource values” and makes no mention of limiting determinations to tangible or measurable resources.

Third, in statements such as “ANICLA mandated access and use may not be subjectively curtailed by noise concerns” the state seems to argue that the NPS has no leeway to interpret its ANICLA mandates. Putting aside the fact that the state’s analysis appears to allow the NPS to limit access based on “non-subjective” noise analysis, the courts have consistently held that federal agencies such as the NPS are free to reasonably interpret their legislative mandates. This is exactly what the 2001 management policies do when they require the agency to protect soundscapes and other intangible resources. Finally, if the state believes so strongly that the 2001 policies violate ANICLA they could have easily challenged them in court. They didn’t, seriously calling into question the reality of their position.

Climate Change

We also urge the NPS to begin addressing climate change and its impact upon park resources. The RDEIS is an excellent opportunity to begin the process of preventing and mitigating changes that will result from rising global temperatures. Over the past 100 years, emissions of greenhouse gas pollution have led to increased global temperatures of more than 1°F, an unprecedented event in the last 1,000 years. Scientists worldwide predict that the pace of global climate change will accelerate over the next century and impact ecosystems with increasingly dramatic results. Average global temperature increase is projected to result in reduced water availability, increased catastrophic wildfires and storms, and habitat impacts that could wipe out entire species and ecosystems. Scientists predict a rise in sea level of up to 2.89 feet as a result of projected global temperature increases. Coupled with increasingly severe storm events, a sea level rise of this magnitude will reshape coastlines and submerge low-elevation islands entirely in both the U.S. and abroad. These global climate change impacts will occur so rapidly that many plant and wildlife species will not survive.

The Arctic in general and Denali National Park in particular will not be immune to these impacts. For example, the park’s diverse ecosystem could be altered, with warmer temperatures causing the melting permafrost, severe storms, drought, and exotic species spread. The National Park Service should encourage further study of global warming impacts and incorporate a plan for mitigation measures from such impacts in the park.

Conclusion

National Parks such as Denali are a great gift. Our grandparents put aside their short-term interests and invested in protecting these areas so that we may enjoy them today. At a minimum we owe it to our grandchildren to do the same. Selfish, short term, profit motivated interest should not guide the Park Service’s backcountry management plan. Rather, a long term vision, based upon the common good must be the guiding philosophy for all park management decisions. The RDEIS must also preserve as many options as possible for those future generations. In this light we urge the NPS adopt People for the

3

Comments

Parks Alternative: A Better Future for Denali. It best protects park resources and values, while insuring appropriate and adequate public enjoyment.

Sincerely,

Sean Smith
Public Lands Director
Sean Smith
Bluewater Network
a division of Friends of the Earth
311 California St. #510
San Francisco, CA 94044
(w) 415-544-0790 x. 19
(f) 415-544-0796
www.bluewaternet.org

Response to Comments

Comments



Northern Alaska Environmental Center
830 COLLEGE ROAD, FAIRBANKS, ALASKA 99701-1535
PHONE: (907) 452-5021 FAX: (907) 452-3100
<http://www.northern.org> ♦ info@northern.org



PO Box 78 Denali Park, Alaska 99755
907-685-5956 www.denalicitizens.org

July 15, 2005

Paul Anderson
Superintendent, Denali National Park and Preserve
PO Box 9
Denali Park, Ak 99755

Dear Superintendent Anderson,

On behalf of Denali Citizens Council (DCC) and the Northern Alaska Environmental Center (NAEC), thank you for the opportunity to comment on the Revised Draft Backcountry Management Plan for Denali National Park and Preserve. We appreciate the assistance we've received from you and your entire planning staff over the course of this plan. We intend, with these comments, to provide you with substantive suggestions (numbered serially and in bold type) for how to create a final plan that better protects and preserves the unique resources and values of Denali's almost 6 million acres of backcountry, nearly 4 million acres of which are suitable for Wilderness designation and 2 million acres of which are statutory Wilderness.

The 300+ members of Denali Citizens Council and the 1,000+ members of the Northern Alaska Environmental Center favor maintaining Denali's natural integrity and wilderness character. Our founders actively supported increasing the size of Denali National Park and Preserve through the Alaska National Interest Lands Conservation Act (ANILCA) of 1980. We continue to support the purpose for adding these 4 million acres - maintenance of an intact ecosystem including the entire Denali mountain massif, and provision opportunities for wilderness recreational activities. In addition, ANILCA specifies that the northern additions were made for ecosystem protection and protection of subsistence lifestyles. With this intent in mind, we are grateful that backcountry management guidelines for the northern additions emphasize resource protection and wilderness character in the RDEIS.

We recognize the importance of selecting a backcountry management strategy that accurately carries out the intent of legislation and park policy for Denali. We also recognize the importance of maintaining the "National Park difference" when managing Denali's backcountry. National Park Service's enabling legislation, the Organic Act, set down this "difference." It provided for the highest degree of resource protection on Park Service lands, and required that use of these lands must be consistent with protection of resource values. Other public lands do not carry this preservation mandate to such a high degree, and focus instead on multiple use and accommodation of a wide range of consumptive use and the attendant negative ecological impacts.

Comments

Response to Comments

The Park Service's commitment to preservation of wilderness resources such as natural sound, intact ecosystem function, and the opportunity for solitude and primitive and unconfined types of recreation is essential to the continued health of one of our park system's most internationally recognized achievements. To this end, DCC and NAEAC have invested a large amount of time and energy engaging the public and discussing appropriate management measures with our Board, members, and community.

With that in mind, we are concerned that the Park Service has undertaken the creation of a Backcountry Management Plan that does not focus enough on monitoring the health of the Park and Preserve.

Because of the unique wilderness resources and values of the Denali backcountry, the Backcountry Management Plan should focus on analyzing the health of the ecosystem, mitigating impacts that are presently occurring, and preventing future impacts. In this regard, both the design of the plan and the actions common to all alternatives are incomplete. Problems include:

- Creation of management zones in the backcountry that will impair wilderness resources and damage the Denali ecosystem
- An inadequate Wilderness Management Plan
- Inadequate mitigation of existing impacts to the Denali ecosystem
- Incomplete description of how NPS and the public will monitor and enforce the standards in the RDEIS.

NPS obligation to avoid impairment

Denali National Park and Preserve is one of the largest and longest protected intact ecosystems in the world. We, as you, are dedicated to retaining the protections forever. Your obligation begins in the Organic Act, which directs NPS to "conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them *unimpaired for the enjoyment of future generations.*" (16 U.S.C. §1) This obligation not only requires you to mitigate resource impairments as they are found, but to anticipate and avoid them. This preservation mandate is further enforced by the Redwood Act amendments to the Organic Act, which state

The authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided for by Congress.
(16 U.S.C.: §1-1a)

The Wilderness Act

Much of Denali National Park is wilderness. This condition is well described in the Wilderness Act of 1964 as one in which geography and wildlife exist in a natural condition, where there are opportunities for solitude in a place relatively unaffected by modern technology, and where the intrusion of mechanized activity is absent. The 2 million acre core park is already designated statutory Wilderness. Most of Denali's additions are suitable for Wilderness designation and must be managed for Wilderness suitability. We commend the NPS planners for listing opportunities for solitude, wilderness recreation, and natural soundscape as resource values in the RDEIS, and for providing indicators and standards with which to track these values. See our comments on the Wilderness Plan below.

Significance of ANILCA

The Alaska National Interest Lands Conservation Act added 4 million acres to then Mt. McKinley National Park in 1980. ANILCA instructed the parks to prepare management plans for all the parks,

Comments

leading to this very plan, instructed all parks to review their lands for recommendation as statutory Wilderness, and provided some exceptions to then existing park management for certain activities on park lands. The two main exceptions were:

- Subsistence activities, including hunting and trapping, would be permissible on conservation system units established by ANILCA, if they were well established on those lands prior to 1980.
- Special access by snowmachines, airplanes and motorboats to reach inholdings and for traditional activities was permitted, subject to regulations to protect park resources.

Much is made of these exceptions to normal park management in the BCMP, but, as explained below, ANILCA's access provisions were created for special situations that existed prior to 1980, where there were pre-existing rural communities on lands incorporated into conservation system units, communities who relied on motorized transport between villages and for the consumptive activities consistent with living a rural life. Other than providing for reasonable, regulated access for existing traditional activities or to existing inholdings, nothing in ANILCA intends to expand the nature or scope of allowable activities within Alaska's national parks.

Relationship of this Plan to prior Denali Planning Documents

We are aware that the Final Backcountry Plan will be an amendment to the General Management Plan of 1986, prepared pursuant to ANILCA. The GMP laid out policy guidelines and facility planning for the future of Denali National Park and Preserve. The GMP recognized the many trends that would affect policy and planning for Denali over the next 20 years, including:

- Growth of large scale tourism in the Denali area, and the need to cap vehicle use on the park road.
- Desirability of developing an alternative visitor center on the South side of the mountain.
- Need for continuous resource management and monitoring.
- NPS intent to purchase the surface estate of mining claims in the park.
- NPS intent to perform and complete a Wilderness Suitability Review.

With the passage of nearly 20 years, the planning objectives of the GMP remain only partially realized. Motorized use by snowmachines in parts of the southern additions has become established, use of aircraft for scenic overflights and airplanes for access both in Kantishna and at several landing areas in the mountainering area south of the park has increased dramatically. The growth of hotel accommodations in areas just outside the entrance to Denali has placed a great deal of pressure on park resources.

The Entrance Area and Road Corridor Plan, completed in 1997, planned for facilities development at the entrance area of the park to accommodate some of this demand and laid down stipulations for the park's road corridor to cap vehicle numbers there. Its companion document, this Backcountry Management Plan, will complete the planning guidance for the entire park and will amend the GMP, along with the South Denali Implementation Plan, still in draft form. These four documents will, as a whole, provide guidance for managing Denali into the next decade or two.

As such, it is important that these documents present a consistent message that prioritizes protection of the resource as a necessary precursor for a quality visitor experience.

To this end, we have three suggestions.

1. Clarify the difference in vision between management for the Park Frontcountry and the Backcountry.

The Final Entrance Area and Road Corridor Plan, under General Vision (p. 14), states

Response to Comments

DCC-1

The National Park Service agrees that the backcountry experience is distinct from the frontcountry experience at Denali, and believes the General Vision expressed in the plan is consistent with NPS intent, as are the management actions. However, while the National Park Service intends for the frontcountry to be the location where visitor facilities and services such as food and restrooms are provided, the intent is not to restrict the entire backcountry only to those visitors who are capable of launching extended, independent backcountry expeditions. There are experiences to be had in the Denali backcountry that are appropriate for those visitors who want to learn about park resources that are not accessible from the road, or for those who want to learn how to travel in a wilderness setting, or for those who want to push themselves a little past their comfort level to experience wilderness on its own terms. These visitors may not wish or be able to spend as much time in the backcountry, or they may need the assistance of a guide. The backcountry should be accessible to these visitors.

Comments

The general vision for the frontcountry of Denali National Park and Preserve is for an area that, 15-20 years from now, still offers the nation's premier opportunities to observe large wildlife species and the highest peak in North America in a primitive, natural setting. The frontcountry area services and facilities would allow as many visitors as possible to view and experience these resources without degrading the resources or the premier visitor experience. (FEIS, p. 14)(emphasis added)

The Revised Backcountry Management Plan, under General Vision, states

The National Park Service will preserve outstanding opportunities to view wildlife and mountain scenery, to experience wilderness, and to study wildlife, habitat and ecosystem patterns and processes in the backcountry of Denali National Park and Preserve. Denali will retain its unique status as a park that offers an undeveloped Alaskan wilderness park experience distinct from the wilderness and park experience in the other states, while being more accessible than most national parks in Alaska because of the adjacent highway system and interior park road. In order to preserve the park's character and unique recreational opportunities, the National Park Service will seek to provide recreational opportunities in the Denali Park backcountry that are compatible with the unique resources and values for which the park was established. Other recreational activities can occur on adjacent public lands that possess excellent wildland qualities but also have broader management mandates that are more appropriate for some uses.. (RDEIS, p. 10) (emphasis added)

The final plan should emphasize that the backcountry experience is different from the frontcountry experience. For a more directed, comfortable and low time commitment Park experience, the frontcountry would be the appropriate location for a visitor. For experiences that may require more effort and time, and less convenience or assistance, the backcountry would be the preferred choice. It is unnecessary to provide convenient, quick and easy experiences in the backcountry and the two areas of the park should complement one another to provide the full range of opportunities.

2. Clarify the meaning and applicability of management zones in prior plans to promote internal consistency with the RDEIS.
In the GMP, the following terms are used to refer to zones or classifications of park lands. Are they being replaced by different terms in the RDEIS for Backcountry Management?
Natural Area, Park Development Zone, Special Use Zone, Outstanding Natural Feature Subzone
In the Entrance Area and Road Corridor EIS, the following terms are used to describe areas adjacent to the park road that verge on the backcountry. Do they still exist for the Revised Backcountry Plan? *Backcountry Day Use Zone, Development Zone D-1 and D-2, Motorized Sightseeing Zones 1, 2 and 3, Hiker.*

3. Recognize that caps and limits to access and types of activities will be necessary to preserve Denali's wilderness backcountry, rather than assuming that South Denali development will absorb the extra demand, as stated in the GMP.

The General Management Plan (1986), at page 15, states that

...visitors who cannot be accommodated on the north side of the park can be accommodated on the south side once the proposal for south-side development is implemented. In fact, development of the south side of Denali as an alternative visitor destination is expected to provide additional recreational opportunities for

Response to Comments

DCC-2

Additional language has been added to chapter 1 to clarify the relationship among management zones between the 1986 *General Management Plan* and subsequent amendments, including this one.

DCC-3

The plan recognizes that caps on visitor use may be necessary to preserve wilderness resource values and other park resources. Establishing limits on the number of visitors is one of the tools for managing access to achieve the standards in the plan. However, the goal of the plan is not to limit visitation, but to protect park resources and a range of visitor opportunities. Caps on visitor use would be established only if necessary to protect park resources.

2

3

Comments

visitors to Denali, resulting in a leveling off of demand for transportation services and accommodations in the northern part of the park.

This language is outdated, in view of rising demand and the need to protect this park into the distant future, when world population and demand will continue to rise. It is no longer easy to predict that south side development will absorb ALL the extra demand to visit Denali National Park and Preserve. NPS needs to take the opportunity provided by this Plan to assert a well known truth, that is, *to protect the resource and the visitor experience, caps on some types and levels of use are appropriate and necessary to protect resources.*

General Vision – Preferred Alternative 4

In an overview of Alternative 4, the preferred alternative, the RDEIS states that this plan would *provide opportunities for a variety of wilderness recreational activities and experiences by establishing areas to serve those visitors who want to experience the wilderness resource values of the Denali backcountry but require services, assistance or short time commitments. However, the areas would be of sufficient size to accommodate anticipated growth in the next 20 years and would be focused along the park road in the Old Park and Kantishna; at the Ruth, Tokositna and Kahiltna Glaciers; and in the Dunkle Hills/Broad Pass area. The remainder of the backcountry would be managed for dispersed, self-reliant travel, and would include opportunities for extended expeditions in very remote locations.* (RDEIS, p. 70)

Denali Citizens Council disagrees with the selection of Alternative 4 as the preferred alternative, for several reasons:

- 4 • NPS is not obliged to provide easy access to a “backcountry experience” through use of corridors and crowded portals. As stated above, these more convenient, assisted experiences should, where at all possible, be confined to the frontcountry.
- 5 • Management Area A designations for the identified areas (Kantishna, the Ruth, Tokositna and Kahiltna Glaciers and Dunkle Hills area) would, in our opinion, allow impacts that would impair suitability for Wilderness suitability in areas that you have agreed to manage for Wilderness suitability. There are no hard and fast rules out there that state unequivocally where the line is crossed to impairment, but Management Area A permits *High* encounter rates and natural sound disturbance, and *Medium* levels of Trail disturbance and evidence of modern human use. Taken as a whole, these standards seem too likely to impair wilderness character.
- The presence of high use corridors and air access portals in the Management Area A designations further impairs Wilderness suitability by setting the upward limit for its indicator at *Very High* encounter rates and *High* evidence of modern human use. Granted some of the corridors are in Kantishna, where much of the area is not deemed suitable for Wilderness designations. Simply because there are already over 200 overnight guests in Kantishna, however, does not justify the further encouragement of backcountry use, guided backpacking, and designated campsites. \

4. **Our suggestion: Apply the Vision expressed in the Overview for Alternative 2 in the RDEIS, p. 61 to the Final Plan, as follows:**

This alternative would distinguish a unique Denali experience based on dispersed use in a wilderness landscape with few sights or sounds of people or mechanized civilization. There would be few services, facilities or signs of management presence. This alternative would most clearly distinguish the backcountry experience in Denali

Response to Comments

DCC-4

Corridor and Portal management areas are necessary to provide access to where travel options are limited. They are not in themselves necessary to provide “easy access” or “convenient, assisted experiences.” They are necessary to allow for access in some locations where airplane landing areas are limited or where travel corridors are confined, as on rivers. Visitors can use the Corridors or Portals for access before dispersing into surrounding areas for backcountry experiences that may in fact be quite arduous and lengthy.

DCC-5

Although Management Area A, Corridors, and Portals do allow for higher levels of use than in other portions of the park, it is difficult to conclude that they would impair wilderness resource values. There are many designated wilderness areas in the Lower 48 that receive this much use. Although Alaskan parks, and Denali in particular, should be held to a high standard for reasons articulated in chapter 1, it seems reasonable that some parts of the park and preserve could allow for higher levels of use that might be more typical of wilderness areas in more crowded parts of the country. Refer to the definition of impairment in the general Methodology section of Chapter 4: Environmental Consequences.

Comments

Response to Comments

from the surrounding public lands, providing a place primarily for visitors who are very self-reliant, and would include many opportunities for extended expeditions in very remote locations. Backcountry users seeking other experiences would find those opportunities on neighboring lands.

This is arguably the only Vision that will protect and preserve the Denali Park Backcountry through many generations into the future. This Vision makes a *high quality wilderness recreation experience* more likely for our great grandchildren.

Wilderness Management

Denali National Park and Preserve was founded and expanded in part to preserve unaltered ecosystems in their natural state and to preserve wilderness values.¹ The Park and Preserve additions were specifically added to provide continued wilderness recreation activities.² ANILCA also adopted the definition of wilderness from the Wilderness Act.³ This definition states

A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this chapter an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which

- (1) generally appears to have been affected primarily by forces of nature, with the imprint of man's work substantially unnoticeable;*
- (2) has outstanding recreation opportunities for solitude or a primitive and unconfined type of recreation;*
- (3) has at least five thousand acres of land or is of sufficient size to make practicable its preservation and use in an unimpaired condition; and*
- (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historic value.⁴*

As noted in your Wilderness Suitability Review, about 3.73 million acres of the Park and Preserve additions were found suitable for wilderness designation.⁵ Although NPS ultimately recommended wilderness designation for 2.25 million acres, the Secretary of the Interior and President never forwarded the request to Congress. Despite this fact, and although new activities are proposed in the Backcountry Management Plan that could degrade wilderness resources, the RDEIS proposes to present a legitimate Wilderness Management Plan.

To meet this statutory obligation, NPS must forward Wilderness recommendations, manage suitable Wilderness as de facto Wilderness, provide a valid Wilderness Management Plan, and mitigate ongoing activities that either impair wilderness resources or preclude future designations.

- (1) Wilderness Designation and Recommendation

¹ 16 U.S.C. §§ 3101-3223 (See § 101)

² *Id.* (See § 202)

³ *Id.* (See § 102)

⁴ 16 U.S.C. §§ 1131-1136.

⁵ NPS, Denali General Mgt. Plan/Land Protection Plan/Wilderness Suitability Review (1986).

Comments

6
As stated above, the Secretary of Interior has failed to complete the Wilderness Designation process. During this time, there have been changes to the resources of the Park and Preserve additions. For example, in the twenty years since the Suitability Review, there have been reclaimed areas in the Kantishna Hills that would likely be identified as suitable for designation. There has also been a large increase in snowmachine use and other unacceptable impacts to the Park Preserve and Additions. Despite the fact that no action has been taken on this ANILCA mandate, NPS puts Wilderness Suitability and Wilderness Recommendations under the “Planning Issues Considered but Not Addressed” section of the document.⁶

(2) Management of Lands Suitable for Wilderness Designation

As discussed above, the Park Service has made a formal finding that 3.73 million acres of the Park and Preserve are “suitable” for wilderness designation. Both the General Management Plan and Park Service regulations require that these lands be managed as statutory wilderness until the formal designation process is complete. As stated in the RDEIS, Chapter 6, Section 6.3.1 of Park Service Management Policies describes this obligation in detail:

For the purpose of applying NPS wilderness policies, the term ‘wilderness’ includes the categories of suitable, study, proposed, recommended and designated wilderness. NPS wilderness policies apply regardless of category . . . In addition to managing these classified areas for the preservation of their wilderness values, planning for these areas must ensure that the wilderness character is likewise preserved. . . . The National Park Service will take no action that would diminish the wilderness suitability of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed. Until that time, management decisions pertaining to lands qualifying as wilderness will be made in expectation of eventual wilderness designation.⁷

The Denali General Management Plan, to which the Backcountry Plan is an amendment, similarly concludes that

[a]ll lands determined suitable for wilderness designation will be managed under the terms of ANILCA to maintain the wilderness character and values of the lands until designation recommendations have been proposed and Congress has acted on these proposals.⁸

7
Despite these mandates, however, the Park Service states that it will only manage the 2.25 million acres of recommended wilderness for wilderness values.⁹ This statement impermissibly lessens the management responsibility for the 1.48 million acres of remaining suitable wilderness that was not recommended. The Park Service must recognize that all lands suitable for wilderness must be managed as wilderness.¹⁰

Similarly, you are obligated to manage the areas in the Kantishna Hills that are now suitable for wilderness as de facto wilderness. As stated in a 2002 Park Service guidance memorandum: “wilderness review is an on-going affirmative NPS obligation.”

⁶ RDEIS, pg. 26.

⁷ RDEIS, pg. 21.

⁸ Id.

⁹ RDEIS, pg. 26.

Response to Comments

DCC-6

See PTP-6.

DCC-7

This plan specifies that the National Park Service would manage the backcountry of Denali to protect wilderness resource values throughout the park and preserve because of legal direction from ANILCA, Denali’s specific management history and philosophy, public interest, and NPS Management Policies. NPS Management Policies specify that the agency “will take no action that would diminish the wilderness suitability of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed.” The statements in chapters 1 and 3 that referred to “recommended” wilderness have been removed in the modified preferred alternative.

Comments

(3) Wilderness Management Plan

Although the Backcountry Management Plan is proffered as a substitute for a Wilderness Management Plan, the preferred alternative under the Backcountry Management Plan allows heightened impacts to wilderness, authorizes illegal activities incompatible with wilderness, ignores the Park Service's failure to finish the Wilderness Recommendation process, and does not adequately evaluate and mitigate park wide and site specific impacts to the backcountry.

An adequate wilderness management plan must focus on the wilderness as a whole and provide for mitigation of impacts, monitoring of resources and strict enforcement. However, the RDEIS gives only a half hearted effort at producing a full fledged Wilderness Plan. The Wilderness Plan as included in the RDEIS is not a discreet plan but instead a hodge-podge of page references.

In appendix B, p. 489, you list the requirements for a full fledged Wilderness Plan. However, you admit that

This plan does not, however, follow the outline recommended in Appendix D of Reference Manual 41 for constructing Wilderness Management Plans since its primary purpose is to serve as a General Management Plan amendment and several wilderness plan components are addressed in other park planning documents.

Our suggestions are as follows:

- 8 5. **Compile a separate, free-standing or appended Wilderness Management Plan organized according to the outline shown in Appendix B of the RDEIS. Combine within this plan the bits and pieces that appear throughout the Backcountry Plan and other planning documents, that describe the Wilderness Act, legislative history, and your commitment to preserving wilderness resource values. Changes and additions are suggested below.**
- 9 6. **Under "A. Goals and Objectives of the Plan," we applaud your inclusion of wilderness character and opportunities for solitude as core values and agree that they are measurable and can be tracked using visitor surveys and monitoring activities. The Goal Statement should reassert NPS resolve to forward Wilderness recommendations to Congress in a timely fashion for Denali's additions. We support the NPS recognition that Denali's northern additions have high wilderness values and relatively little impairment at present and urge you to insert language in the Wilderness Plan that supports non-degradation of the high resource values in this area.**
- 10 7. **Under "Goals and Objectives," please include language that Denali's additions, 3.75 million acres of which have been deemed suitable for Wilderness designation, will be managed in a way to retain their Wilderness suitability.**
- 11 8. **Under "B. Establish Desired Future Conditions," we argue that not all of the Management Areas to which you refer here could be applied to areas suitable for Wilderness designations, since they will allow encounter rates, evidence of modern use, trail and campsite disturbance and natural sound disturbance to reach a level that impairs Wilderness suitability. These areas are as follows: Management Area A,**

Response to Comments

DCC-8

The outline for a Wilderness Management Plan provided in NPS Reference Manual 41 provides recommended content only. Because almost all of the Denali backcountry falls under the provisions of NPS Management Policies that require a Wilderness Management Plan, and because so many elements of the GMP amendment and the Wilderness Management Plan would overlap, the sensible and efficient approach is to combine the two. The organization of the document adds coherency as compared to the recommended organization in Reference Manual 41.

DCC-9

See PTP-6.

DCC-10

One of the plan's objectives is to "protect and preserve the park's wilderness resource values, including its wilderness character and outstanding opportunities for solitude." It is elsewhere clarified that wilderness resource values are found throughout the backcountry, particularly in the Denali Wilderness and on lands deemed suitable for wilderness designation.

DCC-11

See above, DCC-5.

Comments

Portals, Corridors, Management Area C, and the mountaineering special use areas. A Wilderness Management Plan cannot set desired future conditions that would violate the principles of Wilderness Management. In other words, the Backcountry Management Areas described in the RDEIS cannot be applied in their entirety to the management structure of a Wilderness Management Plan.

9. Under “C. Establish Monitoring Indicators & D. Establish Standards for

Indicators,” the indicators and standards that allow high levels of natural sound disturbance, high encounter rates and medium trail and campsite disturbance are again inappropriate to use for managing Wilderness and suitable wilderness, and thus should not be included in a Wilderness Plan.

10. Under, “Establish Visitor Use Levels,” the Wilderness Plan should commit to a reasonable monitoring strategy that has the intention of developing quotas for each Backcountry Unit that exists within areas suitable for Wilderness designation. This would include monitoring by at least two backcountry rangers plus a valid interview strategy to gather information from visitors and yearly analysis of data for at least the first five years of the plan.

11. Hiking group size. We support the establishment of a maximum group size of 12, as a general concept. However, the Wilderness Plan and the entire Backcountry Management Plan, should qualify this number by stating, “it may be necessary in some areas to limit group size to prevent resource damage and preserve a wilderness experience.” This would be especially true in the more mountainous areas of the park that are not ice or snow bound, such as the headwaters of the Tektanika, Sanctuary, Savage, Thorofare, Clearwater and Muddy Rivers, and all areas in OP-2.

Access Management – Snowmachines

One of the purposes of this plan will be to provide access management advice to the National Park Service. We agree that access is one of the most contentious aspects of the RDEIS, since access management covers mechanized activities in the park and additions, including snowmachine access, aircraft overflights, and aircraft landings for scenic and other purposes.

While we recognize that ANILCA granted access to snowmachines for traditional activities into the additions of Denali National Park and Preserve, this access is not unfettered. We urge NPS to get a handle on de facto recreational snowmachining by promulgating a rulemaking to define traditional activities for snowmachine use in the park additions. Below you will find the legal basis for our recommendation, based on the definition of traditional activities, and also on the resource impacts that are sure to occur from snowmachining.

(1) Traditional Activities

The preferred alternative permits recreational snowmachine use in the Park and Preserve under three alternatives, including the Park Service’s preferred alternative. The Park Service justifies this by failing to enforce ANILCA’s § 1110(a) which allows special snowmachine access “for traditional activities . . . and for travel to and from villages and homesites.”¹¹ Under several alternatives, including the preferred alternative, the RDEIS ignores ANILCA’s mandate and fails to distinguish between recreational

¹¹ 16 U.S.C. § 3170(a)

Response to Comments

DCC-12

See above, DCC-3

DCC-13

The modified preferred alternative establishes a maximum group size of six in Management Areas OP-2 and D. The Access tools provide additional flexibility to limit group size if necessary.

Comments

snowmachining, which includes racing, touring, and highmarking, and snowmachining for truly “traditional activities.” Congress provided for several examples of traditional activities for which it meant to grant access in § 1110(a): “subsistence and sport hunting, fishing, berry-picking, and travel between villages,” provided that the activity was generally occurring in the area before its designation in ANILCA.¹²

The Park Service has previously provided a definition for traditional activities, but has only applied the definition to the 2 million acres that makes up the Old Park. Tracking Congress’ intent, this definition states that a “traditional activity” is one that:

“generally and lawfully occurred in the Old Park contemporaneously with the enactment of ANILCA, and that was associated with the Old Park, or a discrete portion thereof, involving the consumptive use of one or more natural resources of the Old Park such as hunting, trapping, fishing, berry picking or similar activities. Recreational use of snowmachines was not a traditional activity. If a traditional activity generally occurred only in a particular area of the Old Park, it would be considered a traditional activity only in the area where it had previously occurred. In addition, a traditional activity must be a legally permissible activity in the Old Park.”¹³

This definition, which is based upon the Park Service’s statutory mandate to allow special access as an exception to the general prohibition, is reasonable and was adopted after a lengthy public process in which there was overwhelming support for protecting the unique character of Denali from the emerging non-traditional use of recreational snowmachines.

The RDEIS alternatives are formulated under the incorrect assumption that the Park Service has the latitude to interpret “traditional activities” in a manner that is inconsistent with the enabling legislation. While Alternatives 2 and 3 would correctly apply the Old Park definition to the ANILCA Park and Preserve additions, Alternatives 1, 4, and 5 allow recreational snowmachining by providing no additional guidance on what qualifies as a “traditional activity.”¹⁴ In the preferred alternative (Alt. 4), the Park Service simply states that snowmachining would be allowed for traditional activities. Placing their proverbial head in the sand, the Park Service pretends that by not defining traditional activities, they will not have to address the increasing illegal recreational snowmachine intrusions into Denali National Park and Preserve.

Despite this, the RDEIS states that “[t]he preferred alternative contains no explicit authorization for recreational snowmachine access.”¹⁵ This is ostensibly because the Backcountry Management Plan allows snowmachining only for undefined “traditional activities.” As any Denali area resident can tell you (and as many stated during the public hearings), there are often crowds of snowmachiners recreationally riding on Park and Preserve lands. This use, which is apparently not ‘explicitly’ authorized, is even implicitly encouraged through Park Service press releases letting the public know that the Park and Preserve additions are open for snowmachining.¹⁶

The Park Service must define “traditional activities” for the entire Park and Preserve. ANILCA does not apply only to certain sections of the Park. Defining a statutory mandate for one area of the Park and

¹² S. Rep. No. 96-413, at 247-248 (1980), reprinted in 1980 U.S.C.A.N. 5191-92.

¹³ 36 C.F.R. 13.63(b)

¹⁴ Alternative 3, however, still illegally allows snowmachining in management areas designated as “corridors.”

¹⁵ RDEIS Executive Summary, pg. 4.

¹⁶ See, e.g., Denali National Park and Preserve News Release dated December 11, 2003 (“Snowmobiling for Traditional Activities Currently Available in Some Portions of Denali National Park and Preserve”).

Response to Comments

DCC-14

Two alternatives of the *Revised Draft EIS* plan contained a proposed definition for “traditional activities.” The National Park Service considered public comment favoring adoption of those or similar alternatives as well as the two alternatives that did not include a definition, and chose an alternative that did not include a definition for the preferred alternative. The National Park Service believes that a definition is not required at this time in order to achieve the goals and standards described in the plan, but retains the discretion to define “traditional activities” for the park additions and preserve in the future if it becomes necessary to do so.

Comments

Preserve and then using the lack of a definition for another area to implicitly allow an activity expressly banned by the operative definition is disingenuous at best, and constitutes an arbitrary and capricious decision that is not in accordance with ANILCA. Indeed, the folly of not defining the term was recognized during the promulgation of the final rule banning recreational snowmachines from the Old Park. There the Park Service stated that

*NPS intends to define traditional activities and apply such definitions to other park areas, including the remainder of Denali National Park and Preserve, in subsequent processes, such as future rulemakings to implement backcountry management plans for some of the national parks in Alaska.*¹⁷

The Park Service has proffered no reason why this promise and statutory mandate is only met in two of the non-preferred alternatives.

Even if the Park Service were to justify snowmachining as a “traditional activity” by finding some level of recreational snowmachine use in the Park and Preserve additions prior to the adoption of ANILCA, the Park Service would have to limit snowmachine use to that level and to that area of the Park and Preserve where it occurred. The Park Service, having provided no examples of pre-ANILCA snowmachine use for legitimate “traditional activities” in the Park and Preserve additions can therefore permit no use even if recreational snowmachining was defined as a “traditional activity.” It is unclear how a “large but unquantified expansion of snowmachine use in Denali during the 1990s”¹⁸ can be justified as a “traditional activity” occurring at the time of adoption of ANILCA.

The Park Service has abdicated both its responsibility to manage the Park and Preserve additions under ANILCA’s special access guarantee and its responsibility to undertake and present to the public a detailed analysis of the impacts of activities likely to occur under the Plan. The disingenuous lack of a “traditional activities” definition is a de facto illegal authorization of recreational snowmachining. As promised in 2000, a legally adequate definition of “traditional activities” is required under the Backcountry Management Plan.

(2) Impairment

Regardless of what constitutes a “traditional activity,” it is quite clear that recreational snowmachining causes unacceptable impacts to the ANILCA additions to the Park and Preserve. While the RDEIS provides only a general picture of potential impacts from the alternatives, the description of snowmachine impacts make quite clear that recreational snowmachine use is both incompatible with the purpose of the Park and Preserve and causes unacceptable impacts that rise to the level of illegally impairing Park and Preserve ecological and wilderness resources. .

A brief review of the RDEIS description of the general impacts of snowmachining is quite stark. Impacts occur to nearly all resource categories analyzed, including:

- Impacts to wildlife, including behavioral alteration, habitat avoidance (including denning displacement), and increased energy expenditure at critical times when animals are under extreme stress (such as winter, when energy conservation is critical).¹⁹

¹⁷ 65 Fed Reg 37867 (June 19, 2000).
¹⁸ RDEIS, pg. 217.
¹⁹ RDEIS, pg. 257.

Response to Comments

DCC-15

Chapter 4: Environmental Consequences provides in general terms an accurate picture of the type of use likely to take place under the alternatives of the plan, given the limitations of available data, including the type of snowmachine use (see the Assumptions section and discussion under most of the impact topics). See PIP-5 for a discussion of the “traditional activities” definition. There is no requirement for the National Park Service to define “traditional activities” at this time or in this plan.

DCC-16

The use of snowmachines for traditional activities and for subsistence purposes is provided for by statute. The use of snowmachines specifically for recreational purposes is not provided for in the plan. The management area standards and adaptive management framework in the modified preferred alternative would provide the tools necessary to assure that legal use of snowmachines would not impair park resources.

Comments

- Compaction of snow over ice-rich permafrost soils thereby altering snowmelt, increasing soil moisture, reducing the length of the growing season, and lowering soil temperatures beneath the trail and altering physical processes. This includes reducing the suitability of a site for seed germination and spring flower viability as well as increasing surface runoff, reducing infiltration, increasing surface runoff, impeding gas exchange between soil and air, inhibiting root growth, and adversely affecting soil organisms.²⁰
- Direct loss of vegetation through the creation of trails, structural damage to plant tissues, and increased erosion. This leads to change in plant community composition. Indirect effects include changes in the thermal properties of snow from compaction which causes both a reduction in the insulating property of the snow and the lengthening of the duration of snow cover, which, in turn, shortens the growing season for plants.²¹
- Excessive degradation of soundscape through the displacement of ambient natural sound by motorized intrusion.²²
- Degradation of wilderness character through increased encounters with other parties, evidence of modern human use (including the creation of informal trails), and lack of solitude.²³
- Impacts to subsistence resources through interference with traplines, displacement of furbearers, and creation of paths that encourage animals to travel farther from places where subsistence activities generally occur.²⁴
- Impacts to cultural resources as snowmachine use increases and cultural sites are more prone to increased visitation.²⁵

17
Beyond the resource categories examined by the Park Service, there are other unacceptable impacts from snowmachining. These include emission of airborne toxins including nitrogen oxides, carbon monoxide, ozone, particulate matter, aldehydes, 1,3 butadiene, benzenes, and extremely persistent polycyclic aromatic hydrocarbons (PAH). Several of these compounds are listed as “known” or “probable” human carcinogens by EPA. All are believed to cause deleterious health effects in humans and animals well short of fatal doses.²⁶ Toxic raw fuel and air emissions accumulate in the snowpack along rivers, streams and lakes. 80% of the pollutants in the snowpack have been found to be released during the first 20% of snowmelt, and this acid pulse is a major cause of death for aquatic insects and amphibians.²⁷

18
The Park Service reviews and proposes no real studies on the impacts to the Park’s ecological processes and wilderness resources. For example, “[n]o quantitative studies have been completed on the impacts of snowmachine use on vegetation in the Denali National Park area . . .”²⁸ However, “[v]isual assessments in the Bull River/Foggy Pass area and the Windy-Foggy-Easy Pass area have indicated that broken shrub stems, stripped bark (from abrasion), trail development, and late-melting snow were evident in high-use snowmachine areas.”²⁹ Specific impacts on vegetation, wildlife, air, water, and soil beyond these visual assessments are not evaluated or provided in the RDEIS. Without such an analysis and a finding of no impairment, the Park Service simply cannot permit recreational snowmachining on Park and Preserve additions.

²⁰ RDEIS, pg. 221.

²¹ RDEIS, pg. 232.

²² RDEIS, pg. 286.

²³ RDEIS, pg. 311.

²⁴ RDEIS, pg. 333.

²⁵ RDEIS, pg. 359.

²⁶ Environmental Protection Agency. 1993. Motor Vehicle-Related Air Toxics Study.

²⁷ Rawlins, C.L. 1993. *Sky’s Witness: A Year in the Wind River Range*. Henry Holt and Company, New York.

²⁸ RDEIS, pg. 232.

²⁹ *Id.*

Response to Comments

DCC-17

The standards contained in the modified preferred alternative are anticipated to accommodate only relatively low levels of snowmachine use in the park additions and preserve. While it is the goal of the National Park Service to reduce anthropogenic emissions wherever feasible within park boundaries, expected ambient concentrations of emissions from projected levels of dispersed snowmachine activity are likely to be below National Ambient Air Quality Standards, and therefore were not addressed in the BCMP. The accumulation of toxic airborne contaminants in the environment from localized as well as international sources is also of concern to the agency. However, there is insufficient data to presume that deleterious levels of contaminants would be released into the ecosystem from anticipated levels of snowmachine use. The National Park Service retains its ability to utilize the tools identified in the Access section of this plan to protect park resources from air pollutants or toxic releases if clear problems were identified.

DCC-18

The National Park Service provided all of the relevant information related to snowmachine impacts to vegetation, wildlife, water, and soil for which definitive information was available and for which NPS resource experts felt the data could support conclusions regarding adverse impacts. The National Park Service does not authorize recreational snowmachining in this plan. Snowmachines access remains allowed “for traditional activities,” travel to and from villages and homesites, and subsistence use as authorized by law. Additional monitoring for vegetation damage would occur as part of plan implementation as described in Table 2-2.

Comments

These problems with both the Park Service's management of Denali and the lack of information provided on the impacts of snowmachining were made quite clear in official comments on the first EIS by the United States Environmental Protection Agency. EPA stated:

*We have focused our review on the potential impact of snowmobile use on the environment at Denali National Park because we believe that snow machine use, among all proposed uses under the Backcountry Management Plan, has the greatest potential to cause significant environmental impacts . . .*³⁰

EPA further admonished the Park Service for the generality of their discussion of snowmachine impacts and suggested that the Park Service

*does not tie these impacts to locations of concern in the Park additions where the most valuable or sensitive resources might be. Thus, the impacts remain largely undefined. The uncertainty raises concerns because this EIS will, for the first time at Denali National Park, result in the establishment of guidelines permitting widespread snowmobile use without a full understanding of the risk to environmental resources within the Park Addition.*³¹

This reservation on the part of EPA is particularly valid for the Bull River-Dunkle Hills area, marked Management Area A in the RDEIS and shot through with three high use corridors. This area is known to have been caribou calving grounds as recently as 1996 and caribou spend time in the Cantwell area during the winter. This general area is known to be valuable moose habitat as well. The preferred alternative and the entire Revised Backcountry Plan in general avoid discussing how impacts to park wildlife will be monitored and mitigated in the higher use areas, Management Area A and Corridors). The area is, in addition, important for subsistence users. The Denali Subsistence Resource Commission has gone on record as concerned regarding user conflicts with recreational snowmachining

We concur with the EPA, whose comments have not been addressed in the revised DEIS. The Park Service must examine both the park wide and site specific impacts of snowmachining. These will confirm what should realistically be the Park Service's default assumption that snowmachines are now or will in the future impair a variety of Park and Preserve resources.

It is also unclear how the Park Service reconciles the de facto authorization of widespread snowmachine use with the findings of the Final Rule on the closure of the Old Park to recreational snowmachining. There the Park Service stated quite clearly that "*any snowmachine use in the Old Park would be detrimental to the resource values of the area.*"³²

Citing the same impacts as presented in this RDEIS, the Park Service concluded that the degradation of wildlife, vegetation, soils, and air and water quality coupled with conflicts between snowmachine use and other recreation and subsistence users, led to a need to ban snowmachine use.³³ A complete reversal in this RDEIS is arbitrary and capricious.

³⁰ RDEIS, pg. 470.

³¹ RDEIS, pg. 471.

³² 65 Fed Reg 37867 (June 19, 2000).

³³ NPS, "Statement of Findings, Permanent Closure," June 2000.

Response to Comments

DCC-19

The modified preferred alternative includes specific direction for monitoring impacts of visitor activity on park wildlife. The management actions described under the Access section of the modified preferred alternative provide management options if monitoring demonstrates a need for action. In addition, the modified preferred alternative has provisions for restricting access if necessary to protect park resources, including wildlife habitat during critical times. For example, if, in the future, caribou crossed into the Dunkle Hills to calve, the National Park Service could temporarily close the Dunkle Hills to all snowmachine access during the calving period, which would provide a reasonable remedy without having to take the more drastic action of closing the entire area to snowmachine access for traditional activities.

DCC-20

The modified preferred alternative is a GMP amendment that addresses management of snowmachine use very broadly. No site-specific proposals were made for snowmachine use or management, so no site-specific impact analysis is necessary or possible. If during implementation there are site-specific measures taken – for example, implementing winter season Corridor management areas that could be used by snowmachines – then site-specific analysis would be appropriate.

Comments

(3) Recreational Opportunities on Surrounding Lands

Finally, the Park Service fails in following their own directive to “define the recreational opportunities of the Denali backcountry and wilderness in the context of a spectrum of recreational opportunities available on public lands in the Denali region.”³⁴ Analysis of snowmobile use on 34.3 million acres of federal and state lands in Southcentral Alaska shows that over 95% of those lands (32.8 million acres) are currently open for snowmachine use.³⁵ It is unclear how the Park Service reconciles the need for increased recreational snowmachine access in the one area managed for “preservation of wilderness character and . . . protecting the park’s intact natural ecosystem”³⁶ which is surrounded by lands managed for multiple use.

Our suggestions regarding snowmachine access are as follows:

- 12. Promulgate a rule to limit snowmachine access in Denali’s additions by defining traditional activities. This will involve a public process and an open investigation of the intent of ANILCA. It is our firm belief that traditional activities does not include recreation. It is the best course of action.**

13. Remove all Corridors from the Final Plan. Most of these were designed with a high encounter rate and high tolerance for natural sound disturbance. In reality, they appear to have been designed to confine snowmachines to high use corridors. However, it is unclear how such corridors can be effectively enforced. Even if recreational snowmachining were authorized somehow, these corridors allow use levels that will impair Denali’s unique resource values and the Wilderness suitability of the lands upon which they are located.

- 14. Remove the Management A category from the Bull River area in the preferred alternative and replace with Management Area B.**

15. Snowmachining, for traditional activities or not, is unsafe on glaciers and should not be allowed there. A high use corridor on the Kamikula Glacier authorized in the preferred alternative should be eliminated from the Final Plan.

Access Management – Airplanes

The use of airplanes as access to wilderness recreation outside the road system for purposes is an established tradition in Alaska and also occurs in Denali Park on various airstrips south of the McKinley massif, for purposes of climbing.

Although Denali Citizens Council supports this concept in general, we oppose general aviation landings in the core Wilderness Park. This is an activity not generally allowed in designated Wilderness and it should not be allowed in Denali.

³⁴ RDEIS, pg. 11.

³⁵ Alaska Department of Natural Resources, 1996.

³⁶ RDEIS, pg. 3.

Response to Comments

DCC-21

Corridors are designated for different reasons. On the Tokositna and Kantishna/Muddy Rivers, boat traffic is the primary means of access to the surrounding areas. Although use on the ground in these areas is very dispersed, there is a much higher likelihood of encountering people and watercraft – including motorized watercraft – on the rivers. In Kantishna, the Moose Creek and Skyline routes were formerly constructed to provide mining access. They remain an important means of access for foot traffic and some motor vehicle access by both subsistence users and private inholders during summer months. Again, there is a much higher likelihood of encountering other visitors, motorized equipment, and noise along these routes than in the surrounding area; these are access routes used by visitors before dispersing further into the backcountry. The Corridors in the Dunkle Hills area likewise provide access to the Old Park boundary and lands of the park additions that surround the Corridors. It is intended that these Corridors would be used by nonmotorized users seeking access to the Old Park as well as by subsistence users or others who use snowmachines for traditional activities. These winter-season Corridors would be mapped for users, GPS waypoints would be established, and, if necessary, route markers could be installed. If monitoring reveals that the Corridors are not being used appropriately then additional actions could be taken. The analysis presented in chapter 4 does not conclude that these few Corridors would impair wilderness resource values of the park additions. The National Park Service believes that limits on the levels of use would maintain the suitability of the area for wilderness designation, and the commenter provides no substantiation or standards for concluding otherwise in either case.

DCC-22

In the modified preferred alternative, Management Area A was not removed entirely from the Bull River area, but it was reduced in size to minimize the chance of conflict between subsistence users and other park users. The Bull River rather than Cantwell Creek is now the eastern boundary of this portion of Management Area A.

21

22

23

Comments

24

Our suggestions are as follows:

16. We urge NPS to begin the process of closing the Wilderness Core Park to airplane landings, except for emergencies, by closing Wonder Lake to airplane landings.
17. In the ANILCA additions, we do not oppose general aviation or air taxi access, but this access must be limited so as to be in compliance with the *Low* Natural Sound disturbance indicator. We support a system of voluntary reporting for general aviation landings in Denali's additions, and we support mandatory registration for all commercial air taxi landings in the additions and for all backpackers who are delivered to the backcountry in planes. We are open to the concept that during implementation of this plan, NPS may decide to close certain areas of the park additions to general aviation or air taxi landings if conflicts with subsistence use or other user conflicts dictate it.
18. We support mandatory registration for day and overnight hikers in all regions of the park, by whatever mode of access they enter the park. Registration can be done at their point of entry into the park with a few survey questions. This will be necessary to support the VERP process of monitoring indicators and standards for the Management areas.
19. We oppose scenic air tour landings in any of Denali's ANILCA additions. We reluctantly accept scenic air tour landings as an established use on certain glaciers south of Denali, as indicated in Management Area A on the Alternative 3 Map. We agree that air taxi landings to support climbing are a legitimate access, however scenic air tour landings do not constitute what is meant by "wilderness recreation" and therefore are not a legitimate form use of the backcountry of a wilderness park. We urge the NPS to use education, negotiation and collaboration to work with scenic air tour providers to reduce natural sound impairment from all air access activities in the climbing areas of Denali. We oppose scenic air tour landings at the Ramparts, Eldridge Glacier and Little Switzerland. Elsewhere their numbers should be limited and air taxi access given priority if mitigation is necessary.

25

20. We support continuation of the Aircraft Overflights Working Group for maintaining a collaborative atmosphere and helping to develop voluntary measures and agreements for achieving desired conditions.
21. We support the cap of 1500 climbing permits for Mt. McKinley per year. Since this cap has not been reached, the Final Plan should state that it is not a goal, just a cap, and that numbers can be limited to a lower level if resource impairment dictates. If increased climbing results in increased air taxi access, some scenic landings may have to be reduced or eliminated.

Access – Off road and other vehicles

Recently, a limited finding that ORVs were traditionally employed for subsistence activities in Denali on three drainages was made and awaits implementation through an extended NEPA process. Such use of ATVs is allowed by ANILCA, as long as it does not impair resources. ORVs may be permitted pursuant to Section 1110 (b) of ANILCA for access to inholdings, along designated mining routes. Otherwise the use of ORVs is now and has been continuously illegal on park lands because of inevitable vegetation and soils damage they cause. We support the closure of Denali National Park and Preserve to

15

Response to Comments

DCC-23

In the preferred alternative of the *Revised Draft EIS*, Corridors were proposed only to the toes of the Kanikula, Tokositna, and Ruth Glaciers. In the modified preferred alternative, all three of these are eliminated or scaled back, with one optional Corridor extending up the Tokositna and Kanikula Rivers only to the mouth of Wildhorse Creek. The National Park Service agrees that riding snowmachines on glaciers is unsafe and park staff recommend against doing so. However, many backcountry activities carry some inherent risk and that is not a sufficient reason to prohibit them. Climbing Mount McKinley is a clear example of an activity that results in injuries every year and fatalities most years, yet is actually supported by an extensive NPS patrol and search-and-rescue presence.

DCC-24

Regulations implementing ANILCA 1110(a) opened the Old Park to airplane landings although it had previously been closed. The National Park Service recognizes that some parts of the Old Park may be particularly sensitive to airplane landings because of ecological, wildlife, or other resource values or there may be significant visitor safety concerns. The modified preferred alternative has added language indicating that the National Park Service would inventory and evaluate these areas in the Old Park and take action necessary to protect them.

DCC-25

Section 202(3)(a) of ANILCA designates the park additions in part "to protect and interpret the entire mountain massif, and additional scenic mountain peaks and formations." Scenic air tour landings provide the opportunity for the general public to understand the scale of the Alaska Range and the glacier and mountain environment, in a way that is impossible from distant viewing locations. Although opportunities for this activity must be balanced with other uses and purposes, providing some level of opportunity is consistent with the statutory purposes of the park additions. The modified preferred alternative would limit locations for scenic air tour landings and establish natural sound disturbance and other standards that would insure an appropriate balance.

Comments

ORVs except under special conditions and in areas specifically authorized under ANILCA. We also support prohibition of helicopter landings and use of jet skis in Denali National Park and Preserve.

Management Areas – General concerns about Adaptive Management

We applaud the crafters of this RDEIS for their effort to describe various management areas for the backcountry of Denali National Park and Preserve in terms of measurable indicators and standards. This effort represents an attempt to establish desired future conditions for various areas in Denali as a way to protect wilderness character and prevent impairment. Such plans, however, depend upon several elements in order to be successful:

- Adequate **indicators and standards** that cover a range or possible impacts to both the resources themselves and to visitor enjoyment and experience (the VERP Process), and that set conditions that support backcountry values.
- A well funded system of **monitoring**, including park staff who will analyze visitor comments and rangers who will personally monitor the backcountry.
- A well funded **enforcement** plan that provides specific actions that will be taken to reduce or avoid impairment of resources. These actions need not await actual impairment but can be applied if the likelihood of impairment exists.
- A scenario for how the park will be managed in the absence of funding for monitoring and enforcement of plan stipulations.

We feel that the Adaptive Management Plan described in the RDEIS fails to pass the above tests for adequacy. A few reasons are given below:

- Indicators are often quite general and qualitative and developing a valid assessment tool to measure them may be difficult. Example, using terms such as *occasional* or *few* social trails when describing Trail and Campsite Disturbance.
- There are no indicators or standards to describe the impacts of activities allowed under this plan upon wildlife. This is an important consideration, as protection of wildlife is a key value for all planning at Denali.
- Monitoring will be analyzed too infrequently. For encounters, camping density and evidence of modern use, analysis is only every five years by visitor survey.
- There is no evidence that the NPS will be able to afford the infrastructure necessary for monitoring. Several backcountry technicians will be required for the sound monitoring program alone, and also for monitoring the backcountry for the above indicators and standards by rangers. With ongoing budget cuts to NPS, despite strong capital appropriations, manning this monitoring program will not be easy. This problem is especially noteworthy in view of the large jump in cost between Alternative 2 and Alternatives 3 and 4. The more the need for monitoring, the more an absence of funding will hurt the monitoring and enforcement piece of the plan.

Our suggestions are as follows:

22. Add indicators and standards for wildlife health to the final plan, or tie the final plan to resource management activities that will be specifically targeted to measuring impacts of backcountry activities, especially in key areas like the Bull River and Kantishna areas.
23. Reconsider those Indicators and Standards that permit *High* and *Very High* levels of natural sound disturbance, backcountry encounters, camping density, evidence of modern human use, and camping density. These types of standards may be more appropriate, if appropriate at all, for the frontcountry, and may detract from Wilderness suitability for those areas where they are applied.

Response to Comments

DCC-26

The only indicators that are not quantified or quantifiable are those for accessibility and administrative presence. Under “Process for Evaluation” in Table 2-2, there is an indication that the “medium” descriptor for trail and campsite disturbance is intended to match current conditions in the Old Park near the road corridor. Data exist that would be used to establish an objective measure of the degree of trail and campsite disturbance for “medium” and “low” standards, and more information would be gathered during the initial stage of implementation.

DCC-27

The modified preferred alternative contains a commitment to monitor the relationship between visitor use and wildlife population, demographics, and distribution, from which specific indicators and standards would be developed.

DCC-28

In general, the National Park Service believes that the standards described for “medium” or “low” levels of disturbance are most appropriate for areas of the park additions and preserve that are suitable for wilderness designation. There are other purposes for the park unit as well, and some of those are best served by allowing a higher level of use in carefully defined and managed areas. Much as the National Park Service allows a very high number of climbers on the West Buttress route on Mount McKinley – which is in designated wilderness – it makes sense to allow a level of airplane use to accommodate non-mountaineering visitors who wish to experience the mountains and glaciers, or to allow higher levels of use at access points or on designated trails. These carefully defined areas do not compromise the suitability of an area for wilderness designation, but are recognized as exceptions within the normal framework of wilderness management. For all these areas, the higher standards would be approached only during certain seasons, and the landscape would retain the characteristics of wilderness: undeveloped, without permanent improvements or human habitation, preservation of natural condition, generally appearing to be affected primarily by the forces of nature with man’s imprint substantially unnoticeable, and having outstanding opportunities for solitude or primitive and unconfined type of recreation.

Comments

24. Affirm in the final plan that NPS will be monitoring the Backcountry Units in the additions to obtain information on establishment of quotas for overnight use, beginning with those units adjacent to the Kantishna Area additions.
25. Specify in the Final EIS how monitoring activities will take place, how many staff are required, frequency of monitoring and method of analysis. (Example: Perform survey analysis yearly for the first five years. Provide at least two full time field rangers for backcountry patrol and monitoring on the north side and two on the southside (in mountaineering areas at that season, in the backcountry otherwise).
26. Specify in the Final Plan how NPS will protect the park if monitoring and enforcement efforts are not funded. How will NPS prioritize scarce resources? Will the NPS adjust the boundaries or standards for Management Areas? What other techniques may be used?

Management Areas – General Concerns about Monitoring and Mitigation

One of our specific concerns regarding the adaptive management scheme outline for the RDEIS is that there is little in the plan about the specifics of the mitigation and monitoring and enforcement programs. In addition, NPS has a great deal of discretion in the use of tools to enforce those future conditions. We are left in the dark as to how exactly NPS will avoid impairment using the standards and tools listed in the RDEIS. The plan allows that NPS has at least ten identified tools to manage the park, including education, enforcement of existing regulations, voluntary restrictions, registration, commercial management, caps on visitor numbers, temporal restrictions, and closures. Some of the tools would require NEPA compliance and promulgation of new regulations. Some, we are told, will be more useful than others in a specific situation. The only commitment NPS has made is to start with the least restrictive tool appropriate to a particular problem.

We would like to see a more thorough plan for monitoring and mitigation in the Final EIS.

The best discussion of mitigation and monitoring is found in the CEQ's "Forty Most Asked Questions Concerning CEQ's NEPA Regulations."³⁷ Question 34c discusses what provisions should be in the ROD and states that

Lead agencies 'shall include appropriate conditions [including mitigation measures and monitoring and enforcement programs] in grants, permits or other approvals' and shall 'condition funding of actions on mitigation.' Section 1505.3. Any such measures that are adopted must be explained and committed in the ROD. The reasonable alternative mitigation measures and monitoring programs should have been addressed in the draft and final EIS. The discussion of mitigation and monitoring in a Record of Decision must be more detailed than a general statement that mitigation is being required, but not so detailed as to duplicate discussion of mitigation in the EIS. The Record of Decision should contain a concise summary identification of the mitigation measures which the agency has committed itself to adopt. The Record of Decision must also state whether all practicable mitigation measures have been adopted and if not, why not. Section 1505.2(c). The Record of Decision must identify the mitigation measures and monitoring and enforcement programs that have been selected and plainly indicate that they are adopted as part of the agency's decision. If the proposed action is the issuance of a permit or other approval, the specific details of the mitigation measures shall then be included as appropriate conditions in whatever grants, permits, funding or other

Response to Comments

DCC-29

The general monitoring strategy for the various indicators is described in the tables that articulate each standard. More specific protocols would be developed as part of implementation, and details on frequency of monitoring and methods of analysis are best developed in conjunction with that process. The number of staff needed is estimated in the Park Operations and Management section of Chapter 4: Environmental Consequences. See also the response to PFP-4.

DCC-30

The National Park Service is responsible for preventing harm to park resources. If inadequate funding compromises the park's ability to know whether harm is occurring, the agency would act proactively to manage visitor use to assure that resources are not impaired. As articulated in chapter 1, the National Park Service need not wait for actual damage to occur before taking protective action to prevent degradation to wildlife and other natural resources. As indicated in the response to PFP-4, one aspect of the plan would be to provide a basis for seeking necessary funding to implement the actions called for by the plan.

DCC-31

See PFP-4.

³⁷ 46 Fed Reg 18026 (March 23, 1981), as amended, 51 Fed Reg 15618 (April 25, 1986).

Comments

approvals are being made by the federal agency, Section 1505.3(a), (b). If the proposal is to be carried out by the federal agency itself, the Record of Decision should delineate the mitigation and monitoring measures in sufficient detail to constitute an enforceable commitment, or incorporate by reference the portions of the EIS that do so.

The responsibility to discuss mitigation measures is found largely in the regulations, detailing an appropriate range of alternatives. The alternatives must include "appropriate mitigations measures not already included in the proposed actions or alternatives" (40 CFR 1502.14 (f)) and the discussion of environmental alternatives must include "means to mitigate adverse environmental impacts" (40 CFR 1502.16(h)). Mitigation measures must "cover the range of the impacts of the proposal" and "must be considered even for impacts that by themselves would not be considered 'significant'" ("Forty Most Asked Questions Concerning CEQ's NEPA Regulations" Question 19a). These mitigation measures "must be developed where it is feasible to do so." (Id., emphasis added). The CEQ's Question 19b highlights the importance of the agency discussing mitigation in detail. It states that

[b]ecause the EIS is the most comprehensive environmental document, it is an ideal vehicle in which to lay out not only the full range of environmental impacts but also the full spectrum of appropriate mitigation. However, to ensure that environmental effects of a proposed action are fairly assessed, the probability of the mitigation measures being implemented must also be discussed. Thus the EIS and the Record of Decision should indicate the likelihood that such measures will be adopted or enforced by the responsible agencies. Sections 1502.16(h), 1505.2. If there is a history of nonenforcement or opposition to such measures, the EIS and Record of Decision should acknowledge such opposition or nonenforcement. If the necessary mitigation measures will not be ready for a long period of time, this fact, of course, should also be recognized."

Final adoption of a concrete mitigation and monitoring plan should be part of the EIS process and should be discussed in the Final EIS so that a finalized plan can be adopted with the Record of Decision. 40 CFR 1505.2(c) discusses the Record of Decision (filed at the conclusion of the EIS decision process) and states that the agency shall

[s]tate whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and if not, why they were not. A monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation.

The Park Service therefore cannot defer the development of monitoring methodologies, but must have a plan ready for implementation with the signing of the ROD.

Management Areas – Specific Concerns

OP – 1 This classification covers a large part of the Old Park Wilderness and provides for known higher uses that occur adjacent to the park road. It tolerates **Medium** encounters and **Medium** Trail and Campsite disturbance. In general these are acceptable standards. However, when hikers and backpackers get further away from the park road, the expectation should move to lower encounter rates and evidence of trails and campsites.

OP – 2 Consistent with the type of experience one would expect in the western Old Park, where access is limited by distance from the park road and by high rivers in the summer. To retain the experience here, we have advocated elsewhere for a closure of the Old Park to general aviation landings

Response to Comments

DCC-32

The National Park Service did not identify mitigation measures under any of the alternatives. The NPS considers the plan's indicators and standards, associated monitoring strategies, and access management tools as alternative actions, not mitigation measures. As a result, the quoted statements from the "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulation" do not apply. The Code of Federal Regulations citations referenced by the commenter also do not apply as they pertain to mitigation, and to monitoring that is specifically related to mitigation, but do not apply to monitoring in general.

Comments

- A Tolerates **High** encounter rate and natural sound disturbance along with **Medium** indicators for trail and campsite disturbance, accessibility and administrative presence. This designation is more appropriate for the frontcountry.
- B Acceptable indicators and standards. Suitable for areas with moderately easy access from transportation systems
- C Allows climbing to occur at levels higher than recommended for other types of backcountry recreation, but may be acceptable in view of the choices preferred by climbers. **High** encounter rate is disturbing, but may be acceptable to most climbers. Presence on glaciers has less impact to wildlife.
- D Supports low indicators and standards in all areas, and describes a wilderness backcountry experience.

33

- E Reserved for very remote sections of the park. **Very Low** encounter rate standard may help to control airplane landings in areas where permitted. We are concerned that the preferred alternative fails to highlight the excellent wilderness qualities of the northern and western park additions by leaving Management Area E entirely out of the alternative.

Corridors Are inappropriate for wilderness backcountry recreations. Allow **High** natural sound disturbance, **Very High** encounter rate. Their impacts will “bleed out” into surrounding lands.

Portal Tolerates **Medium** to **Very High** sound disturbance and Medium to high camping density. These exemplify what happens when air access is highly developed and must be avoided in the northern additions and all areas of the backcountry whose future as Wilderness areas is still a possibility.

Backcountry Hiker This area represents the insertion of the frontcountry into the backcountry, when a trail is built beginning in the road corridor or a developed area defined as frontcountry and extends into the backcountry. **Very High** encounters with people violates management intent of OP 1 lands through which it travels. We favor a no trails policy, unless they are necessary to avoid impacts.

Mountaineering Special Use Areas These are places where **High** and **Very High** encounter rates and soundscape disturbance can occur. May be acceptable to fly in recreationists and climbers but are not appropriate for NPS backcountry. We may be forced to accept these because of a motivated user group that tolerates the noise.

Our suggestions on Management Areas are as follows:

34

27. Reduce the amount of Management Area A to a minimum, perhaps leaving only a small area in the climbers region on the south side of Denali. Make the Kantishna Area Management Area B, and the Dunkle Hills Area B. This designation will allow Medium encounters and sound disturbance, which will tend to cap damaging uses earlier.

28. Eliminate high use corridors, which encourage derogation of park resources.

19

Response to Comments

DCC-33

The modified preferred alternative uses a Management Area D that is a hybrid of Management Areas D and E from the *Revised Draft EIS*, and applies it to much of the northern and western portions of the park additions and preserve. While acknowledging that chance encounters may occur in this area, the general expectation would be that visitors would not encounter other parties.

DCC-34

In response to a broad range of interests in public comment including subsistence users, lodge owners, mountaineers, public interest groups, and others, several management area designations were changed in the modified preferred alternative. The Kantishna Hills were designated as Management Area B, Management Area A in the Dunkle Hills/Broad Pass area was restricted to the west side of the Bull River, and the Coffee and Buckskin Glacier watersheds were switched to Management Area C and B.

Comments

29. Reduce the standard for encounters with people in Backcountry Hiker area to from *Very High to High*, except at the park entrance.

30. Reduce scenic air tour landings at Portals to be consistent with the Alternative 3 map.

31. Designate areas that are more than approx. 10 miles from the park road as OP -2, to set a higher wilderness recreation standard for them. This would make the Toklat-Stony flats and the crest of the Alaska Range east of Anderson Pass OP -2.

Soundscapes Plan

We applaud NPS efforts to support the preservation of natural sounds in Denali's backcountry by including the health of the natural soundscape among the indicators and standards for this plan. Although the natural soundscape as a resource is relatively new in the park system, it has been well studied at Denali for a number of years now. This RDEIS purports to serve as a Soundscape Preservation and Noise Management Plan as required by NPS Directors Order 47.

We are concerned that the Revised Denali Backcountry Management Plan Preferred Alternative will not carry forth the intent of Director's Order #47 for Soundscape Preservation. The order advocates, "to the fullest extent practicable, the protection, maintenance, or restoration of the natural soundscape resource in a condition unimpaired by inappropriate or excessive noise sources." In addition, DO-47 identifies "the obligation to protect or restore the natural soundscape to the level consistent with park purposes, taking into account other applicable laws." Finally DO-47 states that, "where the soundscape is found to be degraded, the objective is to facilitate and promote progress toward the restoration of the natural soundscape." We argue that certain Management Areas and designations in the Preferred Alternative will allow levels of natural sound disturbance that will impair the natural soundscape. Although these designations may, in some cases, represent actual conditions that are difficult to mitigate (for example, air traffic in the Ruth Amphitheater over several months of the year), in other cases (Corridors), the Preferred Alternative will permit new impairment to occur in the future, in violation of the intent of DO-47.

With regard to specific indicators of impairment, we argue that High and Very High Natural Sound Disturbance, which is a potential standard for Management Area A, Ruth Amphitheater Special Use Area, West Buttress Special Use Area, Corridors and Portals, go against the spirit of DO-47. Although we recognize that there is established seasonal use by aircraft of climbing areas on the south slope of Denali, and that this user group may tolerate the additional soundscape disturbance associated with air access, the acceptance by NPS of increases in this impairment, or even the current level of impairment, is against established policy. See our suggestions under Management Areas, above.

We encourage NPS not to apply management designations that have a high probability of impairing the natural soundscape. It is acceptable, in fact required under DO-47, to give areas with impaired natural soundscape a management designation that requires mitigation. The effort that such mitigation will trigger, such as consultation with user groups, education and even closures, may take time, but it is effort well taken. If limits on air access to protect the soundscape are required, we suggest that access for climbing has greater historic legitimacy than access for scenic air tours, although even access for climbing may need to be limited.

We argue, finally, that allowing repeated impairment of the natural soundscape in an area will also reduce or eliminate its suitability for Wilderness designation, something NPS has pledged not to do.

Response to Comments

DCC-35

The Backcountry Hiker areas include all existing and planned trails that cross the wilderness boundary in the Old Park as well as those trails to be constructed in the Kantishna Hills. While some of the trails are not likely to exceed the "high" standard for encounters with people, others such as the Savage River trail would likely exceed it regularly. Because trails are only used in limited areas where overuse creates specific resource concerns and because the National Park Service wishes to encourage visitors to remain on the trails where they are provided, the National Park Service concluded that the "very high" standard would be appropriate for Backcountry Hiker areas. However, this standard remains a limit, not a goal, so on most trails visitors would likely encounter many fewer people than allowed by the standard.

DCC-36

The designation of OP-1 for areas of the Old Park distant from the park road but east of the Muddy River is consistent with the encounter rate standard now used to define overnight backcountry quotas in these areas. To change the management area designation to OP-2 would require reducing the overnight backcountry quotas and reducing the level of use that presently could occur. The National Park Service believes these areas are more similar to the rest of OP1 rather than OP2 in terms of the type of backcountry expeditions that could occur, and the agency sees little justification for reducing presently allowed use levels.

DCC-37

The analysis presented in Chapter 4: Environmental Consequences demonstrates that the standards proposed in the various management areas would not lead to resource impairment. The standards themselves do not indicate when impairment would occur; they only describe the greatest level of visitor impact that would be allowed. Although these standards represent the most impacts that could occur, they represent a limit – not a goal. The National Park Service would work through the Aircraft Overflights Working Group and other mechanisms to pursue the objective of Director's Order #47 to minimize natural sound disturbance and thereby protect, maintain, and restore the natural soundscape resource.

35

36

37

38

39

Comments

Monitoring and Enforcement problems

Although the Plan gives a reasonably complete analysis of the ambient soundscape in Denali on pp 132-138, it does little to describe how it will manage soundscape impairment except by setting desired soundscape conditions for each Management Area, and then stating that one of the tools in the toolkit can and will be used to manage damage soundscape.

The Plan does not state how NPS will mitigate existing damaged soundscapes, although data in the RDEIS indicate that a Medium level of sound disturbance had been experienced by 11 % of park visitors in 2002. However, since NPS has no authority to regulate overflights and other sources of airborne sound disturbance, we acknowledge the understandable difficulty to describe what actions other than consultation and collaboration will be taken.

Cumulative Impacts

DCC and NAEC argue that cumulative impacts from increased snowmachine activity and widespread scenic air tour landings as proposed in alternative 4 make this alternative in violation of the statutory obligation to anticipate and avoid impairment. While NPS may argue that impacts to soundscape are impermanent and seasonal and therefore do not rise to the level of impairment, we disagree. In addition, damage to vegetation, wilderness character and wildlife are inevitable with high encounter rate management designations that include snowmachines. It is the NPS obligation to anticipate and avoid impairment and the preferred alternative does not accomplish this goal. Accepting impairments in parts of the park because “overall” there is minimal impact is inappropriate. Impacts should be mitigated as they occur, and, ideally, prevented.

Commercial Services

The Final Backcountry Plan will serve also as a Commercial Services Plan, and on pp. 56 and 57 describes the criteria for allowing commercial uses in Denali National Park and Preserve. We support the allocation between guided hiking-educational programs and independent users in the backcountry of the park, as quoted on page 57.

We are more guarded in our support of the NPS method of prioritization of various guided activities in the park. We agree that Ranger led programs should take precedence in prioritizing available capacity for guided activities. After that the hierarchy becomes more difficult: Murie science and Learning Center Education programs, followed by accredited education and other programs of non profit educational organizations under a cooperative agreement, and finally programs of other entities, including non profits, schools and for profit businesses. It may be difficult to allocate among various commercial organizations, as it will be difficult to show how great the education component is in each one. We acknowledge that this is difficult and urge you to collaborate with various providers to establish a mutual agreement for prioritizing commercial services.

Our suggestions:

32. **Commercial airplane landings: We support the language of Alternative 3.**
33. **Guided Hiking: We support the language of Alternative 3 with the following changes- do not form designated campsites in the Kantishna Area, and remove Management Area A designation, replacing it with Management Area B. We guardedly support making the Rock Creek, Roadside, Jonesville, Nenana River and Triple Lakes trails available for**

21

Response to Comments

DCC-38

Director’s Order #47 does not appear to have a requirement to “give areas with impaired natural soundscapes a management designation that requires mitigation.” If the resource were impaired, the National Park Service would have a legal obligation under the Organic Act to remedy the situation. The management actions suggested are within the options available to the National Park Service under the modified preferred alternative to assure natural sound disturbance standards are achieved.

DCC-39

The National Park Service agrees that soundscape degradation contributes to a loss of wilderness character and suitability. Natural sound disturbance was included as a factor in the environmental impact analysis for Wilderness Resources. However, the National Park Service concluded impairment would not occur for either for the natural sound or wilderness resources under the modified preferred alternative.

DCC-40

The comment neither disputes the impairment definition provided in the General Methodology section of Chapter 4: Environmental Consequences, nor provides an alternative. Without further information, the National Park Service believes its impairment finding is correct.

DCC-41

The National Park Service agrees with this critique of the hierarchy proposed in the *Revised Draft EIS*. The language has been altered to remove the four-part hierarchy; however, the plan does still make clear that in places where capacity is limited, NPS programs and Murie Science and Learning Center programs would receive first priority. This prioritization is implemented in the eastern portion of the Old Park backcountry, where no off-trail commercial day-hiking services are offered because of an expectation that MSLC programs and NPS Discovery Hikes will utilize available capacity in the near future. Because both of these programs are internally directed by the National Park Service, the agency retains the option to limit these activities in the future if there is a feeling that a commercial guided hiking opportunity would better serve the interests of the public and the park.

Comments

Response to Comments

guided hiking as long as some room is left for independent hikers. Otherwise we favor use of entrance area trails by educational programs only.

34. Sport Hunting: We support the language of Alternative 3 or 4, whichever is preferred by affected parties.

35. Other Commercial Activities: We support the language of Alternative 3. Commercial air taxi services should be subject to consistent monitoring through reporting requirements for the air taxi and for backcountry users transported. The principle would be to manage air access to the additions for wilderness recreational opportunities only, not for scenic landings and to limit their number to correspond to the Low or Very Low encounter rate required by the Management Areas.

Backcountry Facilities

36. Trails: We support the no trails policy articulated in Alternative 2, but we must accept the fact that sometimes social trail formation makes trail building necessary to avoid impairment to resources. Trails should not be built in the backcountry for convenience, but only to avoid impairment.

37. Campsites: We support Alternative 2, no designated campsites in the park backcountry. We support the preparation of a DCP for Kantishna, in which the purpose of Kantishna can be more thoroughly explored and a thorough vision and development concept plan for the area developed.

38. Information facilities: Alternative 2. Authorizing a contact station in the Cantwell/Broad Pass Area is premature. Such development will not require authorization from this plan, if it becomes desirable.

39. Shelters and cabins: We could support rest rooms, plug ins and a warming hut at headquarters if needed to support use, but this facility is not needed right now. The new Murie Center is currently serving as a winter contact station and should continue to do so until the need for another facility becomes apparent.

40: Park Road: Alternative 3.

41. Educational Programs: Alternative 3, with allocations to protect independent users as on page 57 in the RDEIS.

42. Administrative Camps: Alternative 3, retain the 14, 000 foot camp on Mt. McKinley.

Easements and Boundary Changes

43. We support an NPS effort to free the stranded access to Denali Park through private land in Cantwell, if it is what the local people want. We are not certain of how much support this proposal has.

44. We support the land exchange on the Tokositna Coffee and Ruth Rivers to realign the boundary to conform to the river and to free up 137 acres of inholdings.

Comments

In conclusion the Northern Alaska Environmental Center and Denali Citizens Council thank you for your attention to our comments and look forward to continuing our long standing collaboration on the important issues facing Denali National Park and Preserve. These comments reflect a strong attachment to the Vision in Alternative 2 of the RDEIS, with specific comments on individual aspects of the plan that incorporate aspects of Alternative 3 as well. Maps are attached at the end of these comments that provide a more graphic representation of our concerns and suggestions.

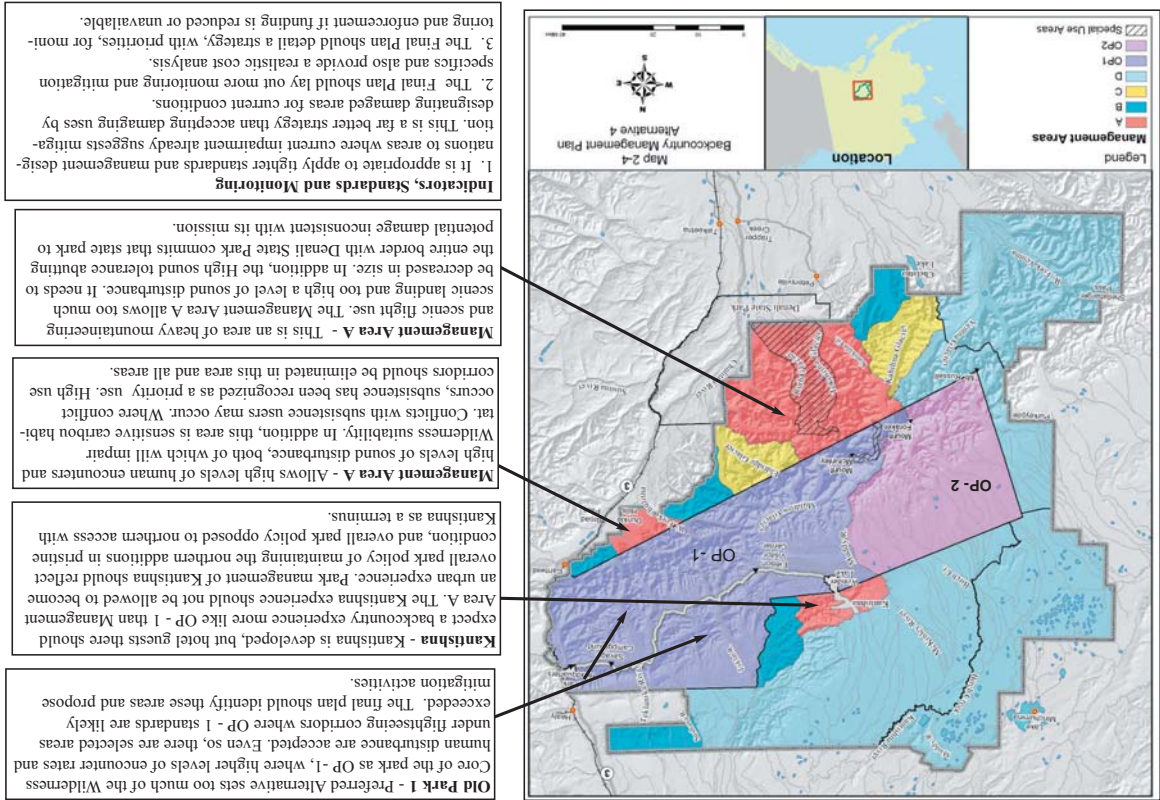
We urge you to be proactive in avoiding impacts and to recognize that you are under no obligation to provide opportunities in the backcountry that will degrade the wilderness recreational experience for future generations. If you have any questions regarding specific comments, feel free to contact us.

Sincerely,

Nancy Bale, President DCC
PO Box 78
Denali Park, Alaska 99755
907-277-3825
nancy@denalicitizens.org

David van den Berg, Executive Director NAEC
830 College Road
Fairbanks, Alaska 99701
907-452-5021
david@northern.org

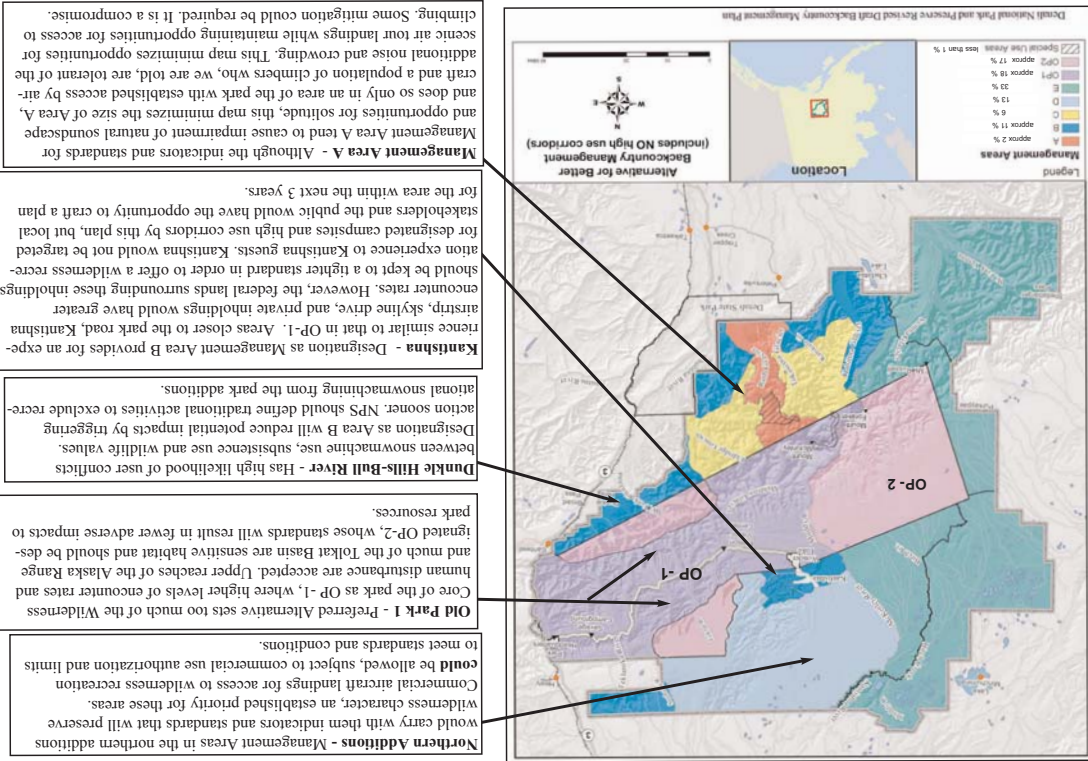
Response to Comments



This alternative contains Management Areas and Corridors that will result in a loss of Wilderness suitability for lands in Denali's ANILCA additions. Standards for higher levels of visitor encounters and noise are too often accepted in this Alternative. The growth of de facto recreational snowmachining is accepted.

NPS Preferred Alternative 4

This map carries forward the vision of Alternative 2, to protect a unique backcountry experience. Visitors with a short time frame or who require assistance would more likely complete their visit in the frontcountry of the park. This map is predicated upon adequate funds for monitoring and enforcement and upon active protection for park wildlife and physical resources.



LAW OFFICES
BIRCH, HORTON, BITTNER AND CHEROT
A PROFESSIONAL CORPORATION
1155 CONNECTICUT AVENUE, N.W. • SUITE 1200 • WASHINGTON, D.C. 20036 • TELEPHONE (202) 659-5800 • FACSIMILE (202) 659-1027

OF COUNSEL
DANIEL C. KENT
THOMAS F. KUMMER
JENNIFER C. ALEXANDER
SHELEY D. BERNAL
KENNETH E. VASSAR
OF COUNSEL
DANIEL C. KENT
THOMAS F. KUMMER
JENNIFER C. ALEXANDER
SHELEY D. BERNAL
KENNETH E. VASSAR
1127 WEST SEVENTH AVENUE
ANCHORAGE, ALASKA 99501-3399
FACSIMILE (907) 278-3880
• D.C. BAR
• D.C. AND ALASKA BAR
• NEW YORK BAR
• ALL OTHERS ALASKA BAR

July 11, 2005

Mr. Paul Anderson
Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali Park, AK 99755

RE: Comments on Draft Backcountry Management Plan

Dear Mr. Anderson:

The International Snowmobile Manufacturers Association ("ISMA") has reviewed the Denali National Park and Preserve Revised Draft Backcountry Management Plan ("Proposal"). While ISMA commends the National Park Service's ("NPS") efforts to establish a plan to manage recreational uses within Denali National Park and Preserve ("Park"), ISMA is deeply concerned with several aspects of the Proposal. The clear intention to manage the Denali Addition lands as a Wilderness Area is contrary to law and sets the stage for unnecessary and improper limitations or prohibitions on motorized access, especially snowmachines, to these lands. ISMA submits the following comments regarding these concerns.

Access

- 1. ANILCA

As you know, management of and access to all conservation system units ("CSUs") in Alaska are governed by the Alaska National Interest Land Conservation Act ("ANILCA"), Pub.L. 96-487. Specifically, section 1110(a) of ANILCA guarantees the use of snowmachines (when there is adequate snow cover) to access CSUs for "traditional activities." § 1110(a). Such access is subject only to "reasonable regulations by the Secretary to protect the natural and other values of the conservation system units . . . and shall not be prohibited unless, after notice and hearing in the vicinity of the affected unit or area, the Secretary finds that such use would be detrimental to the resource values of the unit or area. *Id.* (emphasis added).

Among the reasons NPS identifies for developing a new backcountry management plan is that the former backcountry planning document predated ANILCA and did not apply to the lands added to the Park and Preserve by ANILCA. *Proposal at 5.* NPS further recognizes that

Comments

BIRCH, HORTON, BITTNER AND CHEROT
A PROFESSIONAL CORPORATION

Mr. Paul Anderson
July 11, 2005
Page 2 of 5

ANILCA "created legal mandates for special access that have never been addressed in backcountry planning." *Id.* However, in describing the other reasons for establishing the Proposal (i.e., increased visitation, new uses, and resource protection based on increased visitation and use), it quickly becomes clear that the latter reasons improperly swallow the first.

For instance, NPS indicates that, in addition to applying ANILCA to backcountry management, the Proposal also is needed to address increased visitation for backcountry use, including snowmachine use, and anticipated increases in other activities. *Id. at 6.* Specifically, the Proposal states that while snowmachines "can be an important means to access remote backcountry areas; [] conflicts with other users, especially non-motorized winter recreationists and subsistence users, are increasing, and concerns have been raised about the effects of snowmachine use on wildlife, vegetation, water quality, air quality, and natural soundscapes, and other park resources." *Id. at 7.* Additionally, NPS states that the Proposal is needed to ensure that certain resources values, such as "wildlife, vegetation, natural ecological relationships, natural sounds, and wilderness resource values" are not compromised. *Id.*

1 First, NPS fails to quantify either the conflict among users or the alleged impacts on the identified resources or "values." Despite the fact that each alternative would severely curtail ANILCA's access guarantee for snowmachines, the Proposal is essentially void of any studies, data, or information to establish the need for such use restrictions. Such a change in longstanding management policy without sufficient explanation and substantiation is arbitrary and capricious agency action.

2 Second, while ISMA supports NPS's efforts to manage backcountry activities to protect "resources" related to subsistence needs and to preserve "resources" such as lands, waters, wildlife populations and wildlife habitat, as directed under ANILCA, ISMA objects to any implication that Congress directed NPS to manage the Denali Addition land to preserve subjective amenity "values" such as "natural sounds" or unspecified "wilderness resource values." See *Id. at 8, 212.* Similarly, ISMA objects to NPS's use of "social conditions" as an indicator to gauge the visitor experience and resource conditions in the Park. *Id. at 40.* ANILCA does not authorize NPS to manage section 1110(c) access for social (non-resource) purposes.

3 Notably, none of the Denali Addition lands have been designated as Wilderness by Congress. In fact, ANILCA clearly provides the Addition lands are not to be managed as Wilderness areas until Congress specifically designates them as part of the Wilderness System. § 1317(c). Nonetheless, the Proposal provides that all backcountry areas would be managed as if it were a designated Wilderness area (i.e., managed to leave "the imprint of man's work substantially unnoticeable" and to provide "opportunities for solitude or a primitive and unconfined type of recreation"). *Proposal at 53-56.* NPS must clarify that the Denali Addition lands are not to be managed as Wilderness and that aesthetic and social values that may be

Response to Comments

ISMA-1

The Denali Subsistence Resource Commission has identified conflicts between recreational snowmachine users and subsistence users on many occasions, and the minutes of several specific meetings are referenced in the Subsistence Resources and Opportunities analysis of Chapter 4: Environmental Consequences (e.g., page 346 of the *Revised Draft EIS*). Some plan actions, particularly the management area designations in the Broad Pass area, were developed to respond to this documented conflict. Conflicts with other non-motorized recreational users were identified anecdotally during plan scoping and verified by public comment on the *Draft EIS*. However, although conflicts with these users remains an identified concern under the project's purpose and need, no proposals in the modified preferred alternative were developed specifically to alleviate this conflict. Instead, the management framework developed is intended primarily to safeguard the park's resources and values. Contrary to the assertion of the letter that the plan is "void" of studies that establish a need for management, several sections of chapter 4: Environmental Consequences clearly describe and document the potential adverse impacts of snowmachine use, including sections on ice-rich permafrost soils, vegetation, wildlife, and natural sounds. Finally, the modified preferred alternative does not propose any immediate restrictions on snowmachine use, but sets up an adaptive management framework for monitoring visitor use impacts and responding appropriately.

ISMA-2

The National Parks and Recreation Act of 1978 directs the National Park Service to consider carrying capacity as part of a general management plan or amendment. The National Park Service recommends establishing carrying capacity through the Visitor Experience and Resource Protection (VERP) process, which calls for defining desired future conditions that are expressed through indicators and objective standards that can reasonably be measured over time. These indicators and standards should be chosen to gauge as accurately as possible changes in the resources of the park unit. ANILCA specified that a purpose of the act was to "preserve wilderness resource values and related recreational opportunities" on the public lands designated under the act (ANILCA Sec. 101(b)), and specifically for the Denali additions to provide "continued opportunities, including reasonable access, for mountain climbing, mountaineering and other wilderness recreational activities" (ANILCA Sec. 202(3)(a)). ANILCA furthermore states that the term "wilderness" is defined the same as in the Wilderness Act (ANILCA Sec. 102(13)). Since the Wilderness Act defines "wilderness" partly through

response continued next page

Comments

BIRCH, HOKTON, BITTNER AND CHEROT
A PROFESSIONAL CORPORATION

Mr. Paul Anderson
July 11, 2005
Page 3 of 5

determinative in management of Wilderness areas do not carry similar force and effect in the Denali Addition lands.

In sum, this issue does not boil down to the usual philosophical debate between preservation of resources versus use of and access to resources. Here, NPS is trying to extend its discretion to limit use and access of resources beyond that authorized by law based on purported impacts to subjective aesthetic values including some non-users' enjoyment in "just knowing the Park is there." Such subjective perceptions certainly were not intended to constitute a "resource value" under Section 1110(a) of ANILCA. Rather, ANILCA expressly provides that snowmachine access is guaranteed and "shall not be prohibited unless . . . the Secretary finds that such use would be detrimental to the resource values of the unit or area." ANILCA simply does not identify aesthetic or social values as a "resource value," for purposes of Section 1110(a). Therefore, transmitting the aesthetic and social values of some users into tangible "resources" flatly violates Section 1110(a).

2. "Traditional Activities"

Another potential tool that could be extrapolated from the Proposal to undermine ANILCA's access guarantee is the agency's definition of "traditional activity." Section 1110(a) guarantees the use of snowmachines (when there is adequate snow cover) to access CSU's for "traditional activities." § 1110(a). Since ANILCA's enactment in 1980, "traditional activities" have been generally understood to include fishing, hunting, sightseeing, camping, picnicking, photography, etc. This range of bona fide traditional activities occurred throughout the Denali Addition lands before ANILCA and has continued during the intervening 24 years. Moreover, this range of activities is recognized as "traditional" on millions of acres of other NPS lands in Alaska as well as wildlife Refuges, Monuments, and Wilderness areas managed by the U.S. Fish and Wildlife Service and the U.S. Forest Service.

When these activities were permissible in the Park, individuals were afforded by law the right to use snowmachines, airplanes, and motorboats to access the Park in order to engage in these "traditional activities." Unfortunately, the former Clinton Administration upset this longstanding practice by redefining "traditional activities" in the pre-ANILCA lands to exclude camping, sightseeing, photography, picnicking, and other similar activities in order to force through the 2000 snowmachine closure for the 1.9 million acres of "Old Park."

Now the NPS is proposing to extend this ill-conceived and incorrect definition of "traditional activity" to the Denali Addition lands. *Proposal at 61, 187.* As stated in the Proposal, the effect of applying this definition "would be to close the park and preserve to recreational snowmachine use", with few exceptions. *Plan at 66.* Thus, the only conceivable reason to continue to apply the irrational definition of "traditional activities" is to press another attack on Section 1110(a)'s access guarantee. ISMA strongly encourages the agency to revise

Response to Comments

"social conditions" – e.g. opportunities for solitude – it is appropriate that the Denali BCMP would include indicators and standards for these conditions.

In addition, it is important in implementing the VERP process to choose indicators to "indicate" the condition of multiple resources. For example, the number of encounters with people in the backcountry not only helps to indicate the degree of wilderness solitude to be expected in an area, but is also correlated with use density, which in turn affects many other variables, such as the likelihood of seeing wildlife and potential impacts to vegetation.

Natural sound is not an "amenity" value but a physical, measurable resource that has implications for wilderness resource values, biological values, and visitor experience.

ANILCA does not have a section 1110(c).

ISMA-3

The BCMP does not commit the National Park Service to manage the Denali park additions "as wilderness." However, it does place an emphasis on protecting "wilderness resource values" and "wilderness recreational activities" as prescribed by ANILCA. ANILCA Section 1317(c) does not preclude the NPS from doing so (see SOA-1).

ISMA-4

Based on the extensive public scoping process conducted for this plan and analysis of ANILCA legislative history, the NPS disagrees that "traditional activities" have been "generally understood" to include the activities listed. In fact, disagreement over the definition of "traditional activities" – and thus the extent of snowmachine access protected by ANILCA 1110(a) law and regulation – remains one of the major unresolved issues of ANILCA. Contrary to the assertion in the letter, the U.S. Fish and Wildlife Service has not defined "traditional activities" on any of its lands in Alaska, and the National Park Service has in regulation only the definition for the former Mount McKinley National Park, which includes only consumptive activities that are part of a traditional Alaskan lifestyle, not sightseeing, picnicking, photography, or other purely recreational activities. The 1979 Senate Report on ANILCA also did not refer to sightseeing and photography and explained that the Energy Committee understood that section 1110(a) provided Special Access for "...sport hunting, fishing, berry-picking and travel between villages" (p. 247-248).

Comments

BIRCH, HORTON, BITTNER AND CHEROT
A PROFESSIONAL CORPORATION

Mr. Paul Anderson
July 11, 2005
Page 4 of 5

this definition in order to encompass the actual, longstanding meaning of “traditional” activities, which includes activities such as sightseeing and picnicking that have been occurring in the Park for decades.

To ensure that ANILCA’s access guarantee is properly applied and an appropriate level of access by snowmachine is maintained, ISMA supports and encourages NPS to stand by its proposal to apply a hierarchy of tools beginning with the least restrictive means to reasonably regulate guaranteed access. *Proposal at 50-51*. Additionally, as an overarching measure, ISMA recommends that NPS also update its Management Policies to reflect a similar hierarchical structure as well as a management approach that more appropriately implements NPS’s Organic Act mandates.

Current NPS Management Policies referred to throughout the Proposal are contrary to applicable law and, therefore, NPS should not base its backcountry management plan on these flawed policies. For instance, ANILCA expressly provides that the Denali Addition lands are not to be managed as Wilderness areas until Congress specifically designates them as part of the Wilderness System. § 1317(c). However, in the Proposal, NPS improperly relies on NPS Management Policies that “direct the NPS to ‘take no action that would diminish the wilderness suitability of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed.’” *Proposal at 309*. As a result, the Proposal provides that all backcountry areas would be managed as if it were a designated Wilderness area. *Proposal at 52-56, 309*. NPS relies primarily on a document entitled “Wilderness Management” to examine the recreational opportunities at Denali (Old Park and Additions). *Proposal at 384*. NPS should revise the Management Policies to rectify this and other inconsistencies between the applicable laws and NPS Management Policies. We note that under federal administrative law agency policies cannot be used to trump statutes.

Alternatives

ISMA agrees with NPS’s efforts to provide a revised backcountry management plan for Denali National Park and, therefore, does not support Alternative 1, the no action alternative. ISMA also does not support Alternatives 2-4 because they essentially require the majority of Denali’s backcountry to be managed as a Wilderness area, which it is not. Even the preferred alternative, Alternative 4, which boasts “opportunities for a variety of wilderness recreational activities and experiences” (*Proposal at 70*), eviscerates ANILCA’s access guarantee by limiting snowmachine access in the Addition lands to a crabbed definition of “traditional activities.” As indicated above, when explaining the use of “traditional activities”, the Proposal states that the effect of applying this definition “would be to close the park and preserve to recreational snowmachine use”, with few exceptions. *Proposal at 66*. Clearly, Alternative 4 would have a similar effect.

G:\1012382\GLG0909.DOC

Response to Comments

ISMA-5

The preferred alternative of the *Revised Draft EIS* and the modified preferred alternative of the *Final EIS* do not propose to extend the Old Park definition of “traditional activities” to the Denali additions.

ISMA-6

Updating NPS Management Policies is beyond the scope of the backcountry management plan.

ISMA-7

The National Park Service disagrees that NPS Management Policies are contrary to law and therefore not applicable to the management of Denali. As described above, the decision to manage the Denali backcountry to protect wilderness values and wilderness recreational activities – using the Wilderness Act definition of “wilderness” – comes primarily from ANILCA itself. This direction is supported by overwhelming public interest as reflected in scoping comments and comments on both the original and revised draft plans. It is also influenced by the history and tradition of this particular park unit, as articulated in the Wilderness section of Chapter 3: Affected Environment. Finally, the direction is supported by and consistent with NPS Management Policies, but they are not the only or even the most important reason for the management actions in the Final BCMP. See also SOA-1.

Comments

Response to Comments

BIRCH, HORTON, BITTNER AND CHEROT
A PROFESSIONAL CORPORATION

Mr. Paul Anderson
July 11, 2005
Page 5 of 5

Out of the five alternatives, ISMA believes Alternative 5 provides the most appropriate measures to manage backcountry recreational activities. Alternative 5 essentially splits the Park and the Addition lands to provide one large area of highly dispersed, self-reliant travel and another large segment to provide continued opportunities for greater intensity and high volume use. Alternative 5 also provides the greatest socio-economic benefits to the communities surrounding Denali National Park and Preserve.

However, even Alternative 5 proposes to apply the inappropriate definition of "tradition activities" as applied for use in the Old Park. ISMA strongly opposes NPS's application of this definition as contrary to ANILCA § 1111(a).

Conclusion

Thank you for the opportunity to review and provide comments on the Revised Draft Backcountry Management Plan. ISMA is persuaded that if NPS revises its Management Policies and appropriately applies the hierarchy of management tools identified in the Proposal the 5.6 million acres of the Park may be managed to accommodate ANILCA's access guarantee and provide opportunities for visitors to engage in various backcountry activities, while also conserving the Park resources.

Sincerely,

BIRCH, HORTON, BITTNER
AND CHEROT



William P. Horn

cc: Druce Pearce
Cam Toohy
The Honorable Ted Stevens
The Honorable Lisa Murkowski
The Honorable Don Young

G:\012382\GLG0909.DOC

Comments

Response to Comments

National Parks Conservation Association
750 W. 2nd Ave. #205 Anchorage, AK 99501

15 July 2005

Paul Anderson
Superintendent
Denali National Park
P.O. Box 9
Denali Park, AK 99755

Dear Superintendent Anderson,

Denali National Park and Preserve is one of the premier wilderness national parks in America. Established in 1917, the original Mt. McKinley National Park encompassed about two million acres and, in 1980 with the passage of the Alaska National Interest Lands Conservation Act, it was expanded to six million acres and renamed Denali National Park & Preserve. It is unsurpassed by any other park in the system for supporting fully functional ecosystems while providing the opportunity for hundreds of thousands of visitors every year to experience Alaska's wildlife and wilderness.

The National Parks Conservation Association (NPCA) has reviewed the Denali National Park & Preserve Revised Draft Backcountry Management Plan Environmental Impact Statement (Revised Draft) and offers the following comments. NPCA is America's only private nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the U.S. National Park System. Founded in 1919, NPCA has more than 300,000 members of which 1,000 reside in Alaska.

Consistent with the first draft, the Revised Draft's goal is to "provide future generations with a variety of opportunities to experience the park backcountry while protecting park wildlife and other natural resources, wilderness values, and subsistence uses," (page 1) and that this amendment to the Park's General Management Plan "does not change the fundamental purposes of the park as established in law and policy. Throughout the history of the park, management decisions have been oriented to the preservation of the intangible values of wilderness." (Page 3)

In reading the Purpose and Need (Chapter One of the Denali Backcountry Revised Draft Management Plan), there is no doubt that the Park Service is fully aware of its legal obligation to protect and perpetuate wilderness and other park resources, and that the Park Service is committed to selecting a management regime that does not impair park

Comments

values or negatively impact park resources, including wilderness, solitude, and soundscape. The Purpose and Need section has been improved from the original draft by recognizing and emphasizing the importance of intangible values such as the ability to experience solitude in an untrammeled landscape where the sounds of nature predominate. We are further pleased to see that the revisions recognize that this plan “will seek to provide recreational opportunities in the Denali Backcountry that are compatible with the unique resources and values for which the park was established” (page 11). And that “Other recreational activities can occur on adjacent public lands that possess excellent wildland qualities but also have broader management mandates that are more appropriate for some uses” (page 11).

Denali is different than other public lands in the region. Denali was established and expanded by ANILCA with authorizing language that clearly states that the purpose of national parks in Alaska includes “preserve unrivaled scenic and geological values,” “maintain sound populations, and habitat for, wildlife species,” “preserve extensive, unaltered ecosystems,” “protect resources related to subsistence needs,” and “preserve wilderness resource values and related recreational opportunities such as hiking, canoeing, fishing, and sport hunting.” The Revised Draft is specific in its recognition that protecting wildlife, soundscape, wilderness, and subsistence values are the primary guiding principles at Denali for this and future management plans. The revised draft includes important language about NPS management policies and reminds us that “the impairment of park resources and values may not be allowed unless directly and specifically provided by statute.” (page 14) What is unclear is why the Park Service, in clear contradiction to the direction provided in ANILCA, prefers an alternative that causes some degree of impact or possibly impairment, for almost all proposed management actions.

For while the Park Service has demonstrated an understanding of its obligation to manage the park so as to not impair the park’s resources and to support a wide range of park values, including soundscape, solitude and wilderness, there is a disconnect between recognized need to protect the park’s resources and the plan’s proposed preferred alternative (Alternative 4). NPCA recognizes the very same need to not impair park resources and to support a wide spectrum of park values and, as such, we helped develop and support the People for Parks Alternative. The People for Parks Alternative provides a better future for Denali by blending parts of the preferred alternative with parts of alternatives #2 and #3, both of which, we feel, are more environmentally preferred and provide a higher level of protection for park values and resources.

Summary Position

In support of the need to provide maximum protection for the parks resources, NPCA urges the Park Service to:

Response to Comments

1. **Adoption of the People for Parks Alternative** - By selecting parts of alternatives #2, #3, and #4, this improves the plan's management direction for both resource protection and visitor experience and does a better job of providing for a better future for Denali.
2. **Use the Precautionary Principle** – The National Park Service Organic Act directs parks to be managed so that the scenery, natural and historic objects and wildlife are left “*unimpaired for the enjoyment of future generations.*” This plan's style of management based on “desired future conditions” may sometimes delay action until after damage occurs. In order to fulfill the congressional mandate of the Organic Act, this plan needs strengthening to give park managers the authority to act easily and decisively before park resources are impacted, not after.
3. **Emphasis on a Quality Visitor Experience** – We support and endorse the plan's emphasis on intangible values such as the ability to experience solitude in an untrammelled landscape where the sounds of nature predominate. These values are necessary to preserve Denali's wilderness character for future generations of backcountry users. It is the Park Service's responsibility to manage the park for these values.
4. **Determine Funding and Details for Monitoring Program First** - Before implementing this plan, it is imperative NPS has a detailed and fully funded monitoring program developed with public involvement. This plan also needs to detail how NPS will monitor and enforce the stipulations of this plan if little or no additional funding is made available. We assume much of this needed monitoring information will be in the Record of Decision and we look forward to working with NPS on this critically important part of this process.
5. **Adopt the Old Park regulation for Traditional Activities** – Only two of the alternatives define traditional activities and one of those does so in a manner that still provides for recreational snowmobiling. NPCA continues to be perplexed about how NPS can implement ANILCA Section 1110(a) in the park's 1980 additions without defining traditional activities. The de facto result is allowing recreational snowmobiling, which NPCA strongly feels was not what Congress intended when they passed ANILCA. Recreational snowmobiling is illegal in Denali, damages park resources, and must not be authorized in this plan. To accomplish this the definition for traditional activities currently in use for the Old Park needs to be extended to the 1980 Park Additions and Preserve.
6. **Protect Denali's Soundscape From Impairment** - We are extremely concerned with the high levels of noise allowed in Management Area A, Portals, Corridors, West Buttress Special Use Area, Major Landing Areas, and the Ruth Glacier Special Use Area. We feel the standards of audible motorized noise of 25%-50% of any hour are way beyond reasonable impacts for backcountry areas of a wilderness park. In fact, we believe levels of 50% easily exceed the threshold to be considered impairment. We request both the standards for High and Very High either be completely removed or lowered considerably in the final plan.

- 7. Complete the Wilderness Recommendation** - As required by the Alaska National Interest Lands Conservation Act (ANILCA) the Park Service conducted a wilderness review in 1988 and concluded that approximately 3.73 million additional acres were suitable to be designated as Wilderness. NPS must fulfill its ANILCA obligation to complete the process by having the President forward its recommendation to Congress. In the meantime, NPS can take no action to either diminish the wilderness suitability of the area or reduce the probability of a wilderness designation.

Specific Comments On Revised Draft Plan

The premise of this plan, whose proper implementation is potentially impacted by the real world of 21st Century public land politics, does contain a certain logic. The Park Service identifies Desired Future Conditions for park resources (including values such as solitude and sound), sets standards and indicators that will tell us when those Desired Future Conditions are being exceeded, establishes a monitoring program to tell us when and if Desired Future Conditions are being negatively impacted by human activity, provides for a “toolbox” of actions should those Desired Future Conditions be impacted, and allows for changes in those Desired Future Conditions when new information is made available. This process should work well in the abstract. However, the reality of its application causes us great concern.

Park Service Must Retain Its Discretion to Prevent Impairment - Against this proposed management strategy, one must remember the Organic Act and the fundamental principles established for not only Denali, but all national parks. Pursuant to its Organic Act, the Park Service must manage Denali National Park and Preserve so as to “conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them *unimpaired for the enjoyment of future generations.*” (emphasis added). This preservation mandate is further enforced by the Redwood Act amendments to the Organic Act, which state “The authorization of activities shall be construed and the protection, management, and *administration of these areas shall be conducted in light of the high public value and integrity of the National Park System* and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided for by Congress.”

Nothing in the Alaska Lands Act diminishes these clear directives. In implementing this Desired Future Conditions management approach, the Park Service must recognize that while it may have the discretion to choose the most appropriate tool or mechanism to achieve its desired future resource and social conditions for a particular area, it must adhere to its Congressionally mandated duty to manage the park in a way that ensures its scenery, natural and historic objects, and wildlife will be preserved and left *unimpaired*

Comments

for the enjoyment of future generations. In other words, park managers must act to *prevent* impairment of park resources.

With this reminder of how parks are to be managed, we feel this proposed approach, if not properly implemented with full funding, will lead to impairment of park resources by providing too much flexibility to political influences that would question identified impacts with a desire for “more study” and would weaken or postpone management actions necessary to protect impacted resources. Critical to this whole management approach is timely identification of real, possible, probable, or potential changes or impacts to Desired Future Conditions so that clear and decisive management action can be taken in a timely manner so as to protect park resources. Park Superintendents must be given the authority to take action when they see or anticipate a problem.

Allowing the Superintendent to take action based on what he/she sees or anticipates as impacts to Desired Future Conditions is critical to the success of this management approach. The plan must be clear that both the authority to monitor and the authority to take action lies with the Superintendent. The plan must be clear that if a Superintendent anticipates that an action could or will cause impairment, they are empowered to act BEFORE damage occurs to control or restrict a harmful recreational activity. Anticipating and preventing damage to park resources is more important than reacting to an impact once it starts to occur. The Superintendent must be able to take action as he/she sees fit to respond to actions that are impacting park resources or that COULD impair park resources. Should there be any question of the impact level, the plan must also provide the Superintendent with the direction to err on the side of caution.

Unlike much of the world, Denali National Park and Preserve sustains a vast functioning ecosystem. That ecosystem functions because of 89 years of strict protective measures taken by the National Park Service. Ecosystems can be significantly modified by human actions, often to the detriment of that ecosystem’s sustainability. The cost of rebuilding or rehabilitating an impacted ecosystem is oftentimes staggering. At Denali, we have done it right the first time, so far. Aldo Leopold said that the first rule of tinkering is not to throw away all the pieces. Since we have the pieces at Denali to sustain and perpetuate that functioning ecosystem, then Superintendent must be given the authority to err on the side of conservation. If he/she later finds that a rule, regulation, or emergency order was too strict, it can be loosened. If is virtually impossible to take an action that is too permissive, and damaging to the resource, and tighten it up. Caution is the key word and the plan must be explicit in its direction to embrace the precautionary principle.

React Decisively to Resource Threats – In Actions Common to all alternatives, general guidance for Access does not give the superintendent the necessary authority to react to real or potential threats to park resources. Direction is given on page 50 that the Park Service “would use the least restrictive mechanism or ‘tool’ necessary to accomplish the goal” and “The park superintendent is free to pick whichever tool is required so long as the ‘least restrictive’ criterion is heeded.” Forcing a park manager to use the least restrictive tool would seem to prevent that manager from exercising the precautionary

Response to Comments

NPCA-1

Case law is cited in Chapter 1: Purpose and Need, which demonstrates that the National Park Service has legal authority to act before actual damage occurs to park resources. Text in the “general guidance” of the Access section in the modified preferred alternative has been clarified to indicate the responsibility of the National Park Service to act before standards are exceeded.

NPCA-2

The guidance in the Access section of the modified preferred alternative is clear that the superintendent is not obligated to pick the least restrictive management tool, but the least restrictive management tool that would work to accomplish the goal. Specifically the text reads, “If it becomes necessary to manage travel in any area to achieve desired future resource and social conditions for an area, to reduce visitor conflict, or to protect visitor safety, the National Park Service would use the least restrictive mechanism or ‘tool’ necessary to accomplish the goal.” This language provides the National Park Service great flexibility in managing access to insure that desired future conditions are achieved.

Comments

principle and prevent him/her from taking action using the mechanism or 'tool' that would clearly and without a doubt stop resource damage. That tool may not always be the least restrictive. Least restrictive implies a decision that should work, not one that will definitely work. Preventing resource damage should be the primary function of this plan, yet constricting the range of mechanisms or 'tools' a superintendent can use to that which is the least restrictive handicaps a park manager that wants to exercise caution.

3 Furthermore, that section says that "restrictions and closure would be accomplished consistent with the process outlined in 43 CFR 36.11..." It must be made clear that 36.11 only applies to Title XI/traditional activity closures. At the persistent insistence of the state, the public is being trained to believe that all access in parks for any purpose fits under a traditional activity definition and therefore is under Title XI rules. The access guaranteed under Title XI is not for all access, otherwise why would Congress have made a special exemption? This persistent confusion is another example of the need to define traditional activities so the public will know what is covered by Title XI and what is covered by "other relevant regulations."

4 Improving the Monitoring Program - As the Superintendent monitors the Desired Future Conditions, there must be clear standards and indicators for when those conditions are met or exceeded. Key to monitoring these standards and identifying any changes in the indicators is a solid understanding and documentation of existing conditions and, better yet, conditions as they were when ANILCA passed. The discussion of standards and monitoring in the Actions Common section reference "existing data." A summary of existing data should be in this plan. We find it difficult to determine if we can endorse or support the standards established in the plan without any data showing how these proposed standards relate to what is actually happening on the ground right now or, better yet, during the time since ANILCA passed. There very much needs to be baseline data against which to measure the efficacy of these proposed standards. We are concerned that the extent of existing baseline data is not sufficient to support a monitoring program that can withstand scrutiny from those that will oppose any restrictions or closures. Besides soundscape, are there other areas where existing conditions already exceed the standards?

5 The methodology for measuring change over time for those standards that include encounters with people or human disturbance relies on a visitor survey conducted every five years. Where did five years come from? That seems too long a time period. There can be significant shifts in recreational visitation, with resulting potential impacts to park resources, in only one year (12.3% increase from 2003 to 2004), what could happen if there was this much increase in each of five years without any monitoring by NPS? Backcountry camping has changed as much as 25% (1993 to 1994) in one year, though shifts in the 10%/year range are more common. Still, if we increased 10%/year over 5 years, NPS would be looking at a 50% increase.

As the visitor survey seems to be the primary tool by which you are basing your monitoring plan, we suggest that all survey data collection be done on an annual basis for

Response to Comments

NPCA-3

The National Park Service agrees that the process for closures or restrictions in 43 CFR 36.11 only applies to the "special access" provisions of ANILCA 1110(a). The modified preferred alternative accurately states, "Restrictions and closures would be accomplished consistent with the process outlined in 43 CFR 36.11 and/or other relevant regulations."

NPCA-4

All available data is presented or referenced in the plan in chapters 3 and 4. Although the data has many gaps, the National Park Service believes it provides sufficient information to set provisional indicators and standards. The application of indicators and standards through the Visitor Experience-Resource Protection (VERP) process is the recommended methodology for NPS managers to meet statutory requirements for addressing carrying capacity in General Management Plan documents. The NPS VERP Handbook (NPS 1997b) provides guidance to managers on the entire process. The Handbook specifically recommends establishing provisional indicators and standards in instances where additional information is needed to assure validity and monitoring feasibility. It is essential to have good data in order to provide a realistic picture of what the standards imply for management. However, this "baseline" is mostly important for determining the realism of a standard, because ultimately standard setting is a subjective process based on what is desired for the future, not on current conditions.

NPCA-5

The monitoring language related to visitor surveys has been adjusted to indicate that such surveys would take place "at least once every five years." The detailed monitoring program to be developed during implementation would establish the optimal time periods for repeating surveys.

Comments

at least the first five years after which adjustments can be made for a longer time period if it can be shown a longer time period will to impact the quality of data needed track changes to the backcountry conditions that make Denali such a desirable place to visit.

6 For changes in physical conditions to trails and campsites you only cite "field observations" to describe how these will be monitored. The plan needs to include much more information about these "field observations," such as who is making these observations? How often are they made? Weekly? Monthly? Seasonally? What form will this data be collected so that it can withstand the scrutiny it undoubtedly will receive when it is used by park managers to seek restrictions or closures based on resource damage? There must be a rigorous data collection plan so that all data is uniformly observed, cataloged, and evaluated so it CAN withstand such scrutiny.

The Achilles Heal to this whole plan is the monitoring program. In times of limited funds, NPCA is very concerned that funding for the monitoring necessary to properly implement this plan simply will not be available, leaving wilderness, wildlife, solitude, natural quiet and other park resources at risk. Key among these impacts are those from recreational snowmobiling, an activity that the NPS preferred alternative says can occur in the four million acres added to the park in 1980.

7 NPCA asks that the National Park Service not implement this plan until a monitoring program is fully developed in partnership with the public, including formation of a Citizens Advisory Committee, and fully funded in the operating budget of the park. Major details of and a specific implementation timeline for the monitoring program should be included in the Final EIS and the Record of Decision (ROD), as discussed in Council on Environmental Quality's (CEQ) "Forty Most Asked Questions Concerning CEQ's NEPA Regulations. Question 34c states, in part, that "the discussion of mitigation and monitoring in a Record of Decision must be more detailed than a general statement that mitigation is being required." Detail, which is lacking in the Revised Draft, must be included in Final EIS and the ROD.

8 When NPS selects a final preferred alternative and details its specific impacts, NPS must also include a mitigation plan that specifically addresses those impacts. We look forward to reviewing this mitigation plan in the FEIS.

9 The Record of Decision must also discuss the necessary funding for the monitoring plan. What is the cost of the monitoring program? The cost analysis on page 520 appears overly generalized to be of much use. Nonetheless, it is clear that Alternatives 2 and 3 are significantly more cost effective than Alternatives 4 and 5. This makes sense since the higher number alternatives rely more on goal setting and standards than prescriptive management. In recent years Denali has had a declining budget and as a result has cut a number of staff positions. Nevertheless, successful implementation of this plan relies heavily on monitoring and enforcement – two items requiring a great deal of money and staff. Based on the numbers presented in the cost analysis it appears a more prescriptive approach to backcountry management is better not only to protect park resources, but also more cost effective.

Response to Comments

NPCA-6

See TWS-8 and PFP-4.

NPCA-7

See the discussion under PFP-4 and NPCA-10. See discussion of mitigation and monitoring at DCC-32. Mitigation will be discussed in the Record of Decision as required by CEQ regulations.

NPCA-8

The National Park Service did not identify mitigation measures under any of the alternatives. The BCMP is largely a management strategy to respond to existing and expanding uses in the Denali backcountry. As a result, the NPS considers the plan's indicators and standards, associated monitoring strategies, access management tools, and most other provisions as alternative actions, not mitigation measures, although they are in a sense "mitigating" the impacts of existing use. The Record of Decision will address mitigation as required by regulation.

NPCA-9

Adequate funding is necessary to implement the plan, and the National Park Service intends to use the finalized BCMP as a tool to articulate needs for funding for monitoring and management. The National Park Service would also take advantage of existing funded efforts such as the Central Alaska Network's Vital Signs Monitoring Program and the mandated Resource Stewardship Plan to accomplish many of the indicated actions. However, if funding were not available for adequate monitoring and enforcement, the National Park Service would act proactively to prevent harm to park resources by managing visitor use through rule-making or other more prescriptive means.

Comments

As the monitoring plan moves ahead several key funding questions still loom. Will there be new funding made available to implement the monitoring program? If no new funds are made available, how does the Park Service propose to monitor its Desired Future Conditions with existing staff that is already overloaded with work? What existing park functions will stop to provide for the necessary funding for the monitoring program? These questions must be answered in the Record of Decision.

NPCA suggests formation of a Citizens Advisory Committee to assist NPS with developing and implementing the monitoring program. This is going to be especially important during the development stage of the monitoring plan. This entire plan hinges on monitoring for changes. It cannot be emphasized enough that monitoring data needs to be annually collected, collection protocols consistently applied, and the results rigorously tested to ensure that it can withstand the pressure that will come when NPS uses the data to propose closures and restrictions.

Define Traditional Activities – ANILCA section 1110 (a) provides for access by snowmobile, airplane, motorboat, and other non-motorized methods for traditional activities, and for travel to and from villages and homesteads. In making the regulatory determination that snowmobiles are not allowed in the Old Park, NPS rightly defined traditional activities to be those actions necessary to perpetuate a rural lifestyle, actions such as sport hunting, fishing, managing a trapline, and berry picking. NPCA appreciates the addition of alternatives (#2 and #3) in the revised draft that recognize the need to define traditional activities for the park and preserve the same as for the Old Park. This definition is key to future management of the park especially regarding snowmobiles. The RDEIS specifically recognizes that this definition should be applied to the new park additions in its discussion of Alternative #2 where the draft plan clearly states that the Park Service would define traditional activities “for all areas of the park and preserve and for all modes of access using the present definition employed for snowmachine access in the Old Park (36CFR 13.63(h)).”

This Old Park definition clearly recognizes that Congress did not anticipate recreational snowmobile use when it acknowledged snowmobile use for traditional activities. The legislative intent is clear that a traditional activity was to support the continuation of a rural lifestyle and that recreational use was NOT to be considered a traditional activity. And in support of this Congressional intent, the National Park Service, clearly recognizes in its Old Park definition that recreation was not a traditional activity envisioned by Congress when it passed ANILCA.

It is unclear why the National Park Service is not applying the Old Park definition of traditional activities to the park additions and the preserve. It is unclear how the National Park Service can make recommendations in this plan to permit snowmobile access to the park in its preferred alternative without this basic definition. The ONLY way that snowmobiles can be allowed in Denali is for traditional activities. Recreational snowmobiling, including high-marking, powder-surfing, and glacier exploration, are not

Response to Comments

NPCA-10

The National Park Service encourages public involvement in the development of the monitoring program. In the Implementation section of the modified preferred alternative, the formation of a chartered FACA (Federal Advisory Committee Act) committee would advise the National Park Service on all aspects of plan implementation, with subcommittees addressing topics of particular concern such as overflights (Aircraft Overflights Working Group), hiking impacts, and monitoring.

NPCA-11

See PTP-5.

10

11

Comments

the kinds of activities Congress envisioned when they provided for access to perpetuate the traditional rural lifestyle. Yet the Revised Draft preferred alternative addresses the need to define traditional activities by dismissing it. Without a traditional activities definition, the Park Service has NO BASIS for determining what kind of snowmobile access can be allowed in the park additions and preserve.

We support adopting the definition of traditional activities currently in use in the Old Park for the entire Park & Preserve. We are disappointed the preferred alternative does not define traditional activities and strongly urge you to include this in the final decision.

State of Alaska misguidedly on Title XI implementation - In their comments on the Plan's first draft in 2003, the State of Alaska frequently states that basic park management techniques (such as zoning, permits, or use limits) constitute a closure and are illegal under ANILCA. We strenuously challenge this assertion and find no language in ANILCA to back their claim. While the Park Service has a duty to allow the use of snowmobiles, motorboats, airplanes and other means of non-motorized surface transportation for access to traditional activities according to ANILCA Section 1110(a), such use is neither unlimited nor absolute. First of all, this provision is a narrow exemption that only applies to special access for the continuation of "traditional activities". It is not a general statement for all proposed park activities for all purposes that overrides nationwide NPS regulations and prohibitions as the State implies. Secondly, the use of these transportation methods are subject to "reasonable regulations...to protect the natural and other values" of parks (ANILCA 1110(a)). Finally, the Secretary may prohibit the use of these certain modes of transportation if it is "detrimental to the resource values of the unit or area" (ANILCA 1110(a)). Other than providing for reasonable, regulated access for existing traditional activities, nothing in ANILCA Section 1110(a) or elsewhere purports to expand the nature or scope of allowable activities within Alaska's national parks.

No Recreational Snowmobiling – NPCA is opposed to recreational snowmachining in national parks. What NPS proposes in the preferred alternative does not fall under the special access provisions of ANILCA 1110(a) and is clearly illegal. While the Revised draft plan states "the preferred alternative contains no explicit authorization for recreational snowmachine access" (p. 2), this is simply not true. In the preferred alternative NPS proposes two types of snowmobiling, both of which include recreation and both of which NPCA opposes for the following reasons.

1. Snowmachine Corridors – "Access for Wilderness Recreation"
The Park Service is proposing snowmachine corridors under the guise they are necessary "to provide continued opportunities, including reasonable access, for mountain climbing, mountaineering and other wilderness recreational activities" in accordance with ANILCA section 202(3)(a). However, this reasoning is disingenuous at best. It is simply an excuse to allow illegal recreational riding. In reality the corridors are not providing access by snowmobile to something. If the corridors led to an ice-climbing route inaccessible by plane, and visitors used a

Response to Comments

NPCA-12

Corridors are designated to provide high-use travel routes into the backcountry from which visitors would disperse. The winter Corridors in the Dunkle Hills/Broad Pass and Tokositna areas provide access for all park users, not just those utilizing snowmachines for traditional activities. It is hoped that they would in part be used by non-motorized winter visitors who wish to access the Denali Wilderness on the south side of the Alaska Range, where snow conditions are often better than on the north side. This plan is intended to be valid for 20 years; the National Park Service is not only planning for present demand, but also to accommodate and guide future demand. Recognizing that present needs may not require these winter-season Corridors, the text of the modified preferred alternative was adjusted to indicate that the winter season Corridors on the south side of the Alaska Range would be implemented only "if demand is sufficient."

Comments

snowmobile as transportation to go climbing, it would make sense. However this is not the case. No one requires or has requested such access. The snowmobile corridors are not providing transportation to a recreational activity. The snowmobiling is the activity. Therefore in essence, this provision authorizes recreational snowmachine use.

2. Access for "Undefined" Traditional Activities

NPCA honors the narrow exemption ANILCA section 1110(a) makes to allow snowmobile use for access to traditional activities, such as subsistence and sport hunting, fishing, berry picking, and travel between villages. However, by not clarifying a definition for traditional activities for the park additions and preserve, NPS is making a de facto decision to allow all types of snowmobiling, including for recreation. This is clearly in violation of the intent outlined in ANILCA and the Congressional record for access for traditional activities.

Soundscape Must Be Protected – One of the greatest assets of our national parks is they provide a refuge to escape the sights and sounds of the workaday world, a place where the sounds of nature, not man, predominate. Hearing the chatter of a squirrel, the call of a thrush, or the babbling of a brook does much to reconnect our harried selves to the natural world and renew our spirits. The intrinsic value of natural soundscape is of great importance a large wilderness park such as Denali. The direction of Directors Order 47, the Organic Act, and NPS Management Policies all make clear the obligation to protect Denali's natural soundscape. One of our greatest concerns with this plan is the impact allowed to the natural soundscape of Denali's backcountry.

NPCA staff Joan Frankovich recalls a 5-day backpacking trip she took in Denali's Old Park in 1984. On the last day, looking up into the sky, she saw a contrail from a jet and realized that with the exception of her two companions, she had been completely out of sight and sound of the manmade world. What a rare and magnificent experience Denali provided. To read the backcountry observational data (pages 136-137) and learn that such an experience has practically disappeared in 20 years and may no longer be available for future generations is truly distressing. One of Denali's greatest assets is it provides an accessible wilderness experience to a wide variety of backcountry users. It is the duty of this plan to preserve such experiences, especially in the designated Wilderness (Old Park). NPCA regrets the loss of the voluntary flight restrictions around the Wilderness core of the park as outlined in the preliminary alternatives presented in the

Denali Dispatch in 2001. We support this plan's proposal to form an Aircraft Overflights Working Group and request at least two environmental seats comprise this group. We strongly urge NPS and this Working Group to create voluntary flight corridors to protect and improve the soundscape of the Old Park. Additionally, we request Wonder Lake be closed to private airplane landings due to its outstanding scenic setting, nesting loons, and other resource values.

13

14

Response to Comments

NPCA-13

The composition of the Aircraft Overflights Working Group would include balanced representation from all parties that have an interest in aircraft activities over Denali. However, the exact number and composition of the working group would be determined during plan implementation. Likewise, while voluntary flight corridors could be a method used to achieve desired natural sound conditions, the modified preferred alternative concerns itself only with setting the goals and identifying the tools that could be used to achieve the goals. Specific prescriptions are deferred to implementation, and voluntary flight corridors remain only one tool of many that could be utilized.

NPCA-14

See DCC-24.

Comments

In order to support a range of mountaineering experiences on the park's southside that includes some climbing areas free from the noise and intrusion of scenic air tours we support allowing scenic air tour landings on glaciers in all areas designated as

Management Area A of our revised Management Area map. Should that map not be adopted as the final, we would strongly suggest the following change to the existing preferred alternative - *scenic air tours should be exempted from the Eldridge Glacier, Little Switzerland, Pika Glacier, and the Ramparts. Additionally, in order to provide some quieter time for backcountry users, as well as cabins and homes in the flight paths, scenic air tours should be allowed to operate from 9am to 9pm or less.*

15

We are concerned with the extraordinary growth in glacier landings on the south side of the park. In just ten recent years, from 1991 to 2001, the number of scenic landings on the Ruth Glacier increased more than 800%, from 220 to 1800. In 2002 aircraft were audible in more than 50% (maximum 80%) of the sound monitoring samples collected every five minutes between 8 a.m. and 8 p.m. on good weather days in the Ruth Glacier area. While flightseeing provides a spectacular park experience, it should not be so sacred to be exempt from reasonable limits and regulations. Occasionally park buses fill and a visitor must wait a day to travel the park road. This principle should apply to air visitors as well. Also, the visitor who is in the air one day is more than likely to be a visitor on the ground the next. When on the ground this same visitor will likely appreciate the ability to hear the natural sounds of Denali more than the sounds of aircraft.

We commend the Park Service for the depth with which they discuss and include important intangible resources such as soundscape into the Revised Draft. However, we are concerned with the standards set for allowed noise intrusions, especially in snowmobiles in corridors, airplane overflights in the Old Park, and landings in Portals and Major Landing Areas. We find the standards for both the High (up to 25% noise intrusions in any hour) and Very High (up to 50%) categories for Natural Sound Disturbance to be unacceptable. Based on seminars, conferences, and conversations with NPS that NPCA staff have had over the years, we understand that appropriate noise levels for backcountry areas are considered to be in the 5% - 15% range. Noise levels of 25% seem quite high for the recommended Wilderness portions of the Denali backcountry, with 50% completely unwarranted. To be in the backcountry and be unable to hear the sounds of nature half the time seems to us to have easily reached the level of impairment. We question the statements made in the section on Environmental Consequences for Natural Soundscape (pages 281-308). All action alternatives state they would "not result in impairment of park resources". Interestingly, the No Action

Alternative concludes that soundscape impacts "could" result in impairment. We ask what criteria did you use to determine what does and does not constitute impairment? What is the threshold level for when a major impact reaches impairment? We request both the standards for High and Very High either be completely removed or lowered considerably in the final plan.

17

OHV use needs to be clarified - The Revised Draft considered, but did not address ORV use in Denali by recognizing that ORV uses can only occur on state rights-of-way, under

Response to Comments

NPCA-15

See PTP-7.

NPCA-16

The National Park Service agrees that standards for natural sound disturbance in areas protected for their wilderness resource values should be set at a medium level (as described in the modified preferred alternative) or below. However, some level of natural sound disturbance is necessary to provide for other statutory park purposes, such as providing access for wilderness recreational activities or for scenic viewing and interpretation of Mount McKinley and surrounding mountain peaks and formations. The amount of natural sound disturbance allowed within Management Area A and the Ruth Glacier Special Use Area is presently necessary in order to accomplish these park purposes, but the direction of the modified preferred alternative is to keep the size of these areas to a minimum and direct increases in backcountry visitation that is not wilderness-related to these areas.

NPCA-17

The definition of impairment for resource values and the definitions for minor, moderate, and major impacts are all contained within the introduction to Chapter 4: Environmental Consequences. The definition for impairment reads, "A resource would no longer fulfill the specific purposes identified in the park's establishing legislation or its role in maintaining the natural integrity of the park." NPS believes that major adverse impacts can occur without impairment, as is the case with natural sound disturbance under the modified preferred alternative. Although some small areas of the park additions do have major adverse impacts, the protection of the rest of the park additions and preserve, along with conditions that are anticipated to improve within the designated wilderness of the Old Park, lead to a conclusion that impairment would not occur. See the analysis for Natural Soundscape in chapter 4.

Comments

an 1110(b) access permit to inholdings in Kantishma, and that the GMP does not authorize ORV use under ANILCA Section 811 because they were not traditionally employed for subsistence purposes. However, we are aware of the on-going effort to review subsistence ORV use in and around Cantwell. The Final BCMP needs to recognize that there is a process for changing the GMP's no-subsistence use position through a separate "Finding" process, such as the effort in the Cantwell Area. That recognition in the Final BCMP needs to clearly state that any change to the ORV prohibition will only come about through a determination that shows such use is well established over a long period of time, is multi-generational, and that historically documented community-wide subsistence ORV use occurred on the trail(s) in question prior to the enactment of ANILCA. If a determination is issued, the subsequent subsistence ORV use is subject to reasonable regulation necessary to prevent waste or damage to fish, wildlife, terrain, and other Park resources or values and in such a manner as to prevent the harassment, hazing, or herding of wildlife. Subsistence ORV use should be managed under a permit system and only allowed on designated trails. Until a final determination is made in the Cantwell Area, the Revised Draft is clear that subsistence ORV use is not allowed in the park.

18

NPS Must Acknowledge its Wilderness Management Responsibilities - Denali National Park & Preserve is in fact a wilderness park and its purposes under the Alaska National Interest Lands Conservation Act (ANILCA) of 1980 are to preserve those wilderness values. In 1986, as required by ANILCA section 1317 (a), the National Park Service conducted a wilderness suitability review of the 4 million acre New Park. The final environmental impact statement concluded that approximately 3.73 of the 4 million additional acres were suitable for wilderness designation. At that time NPS forwarded a wilderness recommendation of 2.25 million acres to the Secretary of the Interior but the Secretary did not send it to the President as required by ANILCA. There has been no formal action since continuing NPS' failure to comply with statutory and regulatory mandates with respect to wilderness.

The Revised Draft identifies the purpose of the BCMP as the place to address issues for which the guidance in the 1986 General Management Plan is out of date (page 21). The Revised Draft acknowledges that the wilderness suitability review included in the 1986 GMP is now out of date since a new suitability study would likely result in additional acreage identified as suitable in the Kantishma Hills (page 26).

19

Yet despite this admission and a clear legal mandate, NPS refuses to address wilderness suitability in the preferred alternative "because of the complexity of the process and the fact that wilderness designation requires congressional action" (page 26). The NPS process for reviewing and recommending wilderness is clearly outlined and within the purview of the National Park Service and Department of the Interior. Only actual designation requires congressional action. In addition, the Revised Draft provides no explanation as to when it will fulfill its obligations to complete the assessment and recommendation process. NPS must take immediate and effective action to bring the National Park System into compliance with its wilderness assessment, recommendation,

Response to Comments

NPCA-18

Subsistence use is outside the scope of the Backcountry Management Plan. Since ORV use under Section 811 is entirely related to subsistence use, it was not considered within the framework of the BCMP. Text changes to chapter 1 and chapter 2 in the *Final EIS* make factual corrections to statements regarding ORVs in light of the recent finding regarding traditionally employed ORV use in the Cantwell area.

NPCA-19

See PTP-6.

Comments

and planning mandates. NPS must complete the unfinished business of ANILCA section 1317 to effectively complete the backcountry planning process.

Wilderness Needs a Wilderness Plan - NPS Management Policies state that all parks with wilderness resources must have wilderness plans or equivalent documents. And Wilderness Plans and Backcountry Plans are not equivalent documents. In order for a backcountry plan to be an "equivalent document" it must contain the area specific objectives and prescriptions needed to maintain wilderness qualities and attributes. The Revised Draft encompasses both wilderness and non-wilderness resources and as such is not focused adequately on protecting the area's unique wilderness qualities.

The Wilderness Act is different than the NPS Organic Act and as such dictates a different management regime. The need for a differing regime calls for a specific wilderness management plan. Wilderness resources are distinct from other NPS backcountry resources and to maintain the unique qualities that qualify them as wilderness or potential wilderness they need to be managed as distinct areas within the NPS. Management by Desired Future Conditions sets up a situation where wilderness resources are managed only when something bad looks to or has actually occurred. This management by reaction works against wilderness preservation goals because management direction can easily be shaped by a succession of minor decisions. The cumulative results of such decisions may be undesirable and hard to reverse in wilderness.

As a result, the National Park Service must manage all suitable 3.73 million acres of backcountry in Denali National Park as wilderness to protect wilderness character, consistent with the direction of NPS Management Policies (section 6.3.1), that includes categories of suitable, study, proposed, recommended, and designated wilderness within the scope of its wilderness resource management policy (NPS 2001). Wilderness character includes the natural and scenic condition of the land, natural numbers and interactions of wildlife and the integrity of ecological processes. At its core, wilderness character is more than a physical condition. ANILCA section 101 specifically identifies "preserve wilderness resource values" as a fundamental purpose of the Act.

Despite these mandates, however, the Park Service states that it will only manage the 2.25 million acres of recommended wilderness for wilderness values (page 26). This statement impermissibly lessens the management responsibility for the 1.48 million acres of remaining suitable wilderness that was not recommended. The Park Service must recognize that all lands suitable for wilderness must be managed as wilderness.

Adjusting Management Areas for Better Park Protection - Application of the standards and indicators for Desired Future Conditions is in management areas proposed for the entire park and preserve. NPCA has reviewed the draft management area assignments and, like the People for Parks Alternative, find that none of the existing maps accurately reflects how we would like to see these management areas applied on the ground. Using Alternative #3 as the closest to our thinking, we are submitting an alternative management area designation map for NPS consideration (copy attached). The primary

Response to Comments

NPCA -20

NPS Management Policies clearly indicate that Wilderness Management Plans should include all wilderness resources, including on lands that have been determined suitable or have been recommended for wilderness designation. Since almost the entire backcountry falls into one of these categories, and since statutory and policy direction places an emphasis on protecting "wilderness resource values" and "wilderness recreational opportunities," it is reasonable to incorporate the Wilderness Management Plan requirements into the BCMP. This plan does "contain the area specific objectives and prescriptions needed to maintain wilderness qualities and attributes" and has a significant focus on protecting the area's unique wilderness qualities. The objectives are contained within the Management Area descriptions and the prescriptions needed to maintain these wilderness qualities and attributes are spelled out in the remainder of the plan's actions.

NPCA -21

Management through the VERP process is not reactive if it is appropriately implemented. Monitoring is intended to reveal trends in resource conditions, and if the trends indicate that standards would be exceeded in the future, the National Park Service can and should take proactive management steps to manage use and assure that the standards are met. The modified preferred alternative does commit the National Park Service to manage all categories of wilderness within the framework of its wilderness management plan.

Comments

differences being a change in the area around Kantishna from A to B and changes in parts of the Old Park from OP1 to OP2.

While Kantishna does support a number of backcountry lodges, there is no need to sacrifice the visitor experience in that area by allowing high levels of contact. It is an area that lends itself to spreading out use and the goal should be to provide Kantishna visitors with at least a medium encounter rate with minimal trail disturbance and evidence of modern human use. Ensuring this level of visitor experience will be greatly enhanced with the completion of the Kantishna Master Plan. No significant changes to Kantishna Area management should occur until that plan is completed. As such, a change from A to B is suggested.

A medium encounter rate with people and evidence of modern human use is appropriate for the Old Park east of the Muddy River and within seven miles of the park road. But beyond the seven-mile mark, which we think is about the extent of even the most aggressive day-hikers, the Old Park east of the Muddy should be managed as OP2 for very low encounter rates and low evidence of modern human use.

Impact Analysis Needs Improving - The environmental consequences analysis of not only the preferred alternative, but of all the alternatives, seems to be built upon anticipated changes to the current conditions of both park resources and the visitor experience by the proposed actions. Those changes are described in the plan from negligible to major in the summary table of Environmental Consequences (page 93). Yet some of the current conditions, as is the case with soundscape, are already at a level that certainly impact the park and could be classified as impairment. How can a plan be developed that measures the impact of a range of alternatives when the baseline against which those alternatives are measured is already showing distress? NPCA is concerned that the impact descriptions in the Revised Draft do not take into account impacts that are already occurring. Any course of action proposed by the Park Service to mitigate these impacts must include not only the anticipated future changes but also the changes that have already impacted park resources and values. This lack of recognition of the impact of the existing conditions in the park needs to be remedied in the Final Plan and a true description of impacts to park resources, which includes those changes that have already taken place, must be included.

Backcountry Facilities

We support the use of communication facilities to support park management, although we highly endorse the use of satellite phones to limit structures in the park. Providing a cell tower network for commercial communications however, is unacceptable to NPCA.

Easements and Boundary Changes

NPCA supports the need to secure a 17(b) easement near Windy Creek and the proposed boundary adjustment with the State of Alaska.

Response to Comments

NPCA -22

See DCC-34 and DCC-36.

NPCA -23

The summary table necessarily leaves out some information. The complete analysis in Chapter 4: Environmental Consequences clearly describes existing levels of impact and reaches conclusions about cumulative consequences to park resources from past, present, and future actions unrelated to the actions in the BCMP. The results of plan actions are then evaluated to determine their impacts as well as the overall cumulative affects of the plan actions plus the other past, present, and future actions. See also TWS-9.

Comments

People for Parks Alternative Blends A Better Future For Denali – In reviewing the actions specific to the four alternatives presented in the Revised Draft, NPCA and others felt that a blending of alternatives #2, #3, and #4 provided the best management direction for the future of Denali. Those specific actions, transmitted to the National Park Service in previous correspondence, are again listed here with a bit more explanation.

Category	Alternative	Explanation/Rationale
General Concept	2	Denali should continue to be managed as a wilderness park with non-motorized opportunities for wilderness experiences that are markedly different than surrounding public lands. This has been consistently commented on in this letter and our proposal for using alternative #2 language is consistent with our comments. The park superintendent should not be held to the least restrictive tool when a slightly more restrictive tool would better guarantee no damage to park resources.
Motorized Access	2/3 modified	As described previously in this letter, apply the definition of <i>traditional activities</i> currently used in the Old Park to the entire Park & Preserve.
Registration	2	We support convenient registration for all backcountry day users in order to provide park managers with information for better management. Any study of a registration program should only need to look at how best to implement a system, not whether it is needed. The heavy emphasis in this plan on Desired Future Conditions is contingent upon the Park Service having up-to-date data on park users. We fail to see how the Park Service could even consider not requiring registrations to provide such sorely needed data while at the same time endorsing a management regime that is data dependent.
Climbing Limits	3	We agree that a modest increase of climbers over current levels to 1500 to be reevaluated in 10 years is a needed and reasonable limit.
Commercial Airplane Landings	3	In order to support a range of mountaineering experiences that includes some climbing areas free from the noise and intrusion of scenic air tours we support allowing scenic air tour landings on glaciers in all areas designated as Management Area A of our revised Management Area map. Should that map not be adopted as the final, we would strongly suggest the following change to the existing preferred alternative, <i>except scenic tour landings would not be allowed on the Elbridge Glacier, Little Switzerland or the Ramparts. Scenic air tour landings</i>

24

25

Response to Comments

NPCA-24

The National Park Service agrees that data on visitor use are important for successful plan implementation. The process of registering visitors involves a commitment of resources that may not always be cost-effective given use levels or availability of other indicative data. The modified preferred alternative establishes criteria for imposing new registration requirements, imposing requirements only

- 1) in areas where use levels are sufficient enough that user conflicts and/or resource damage are occurring or would occur and
- 2) when other methods for obtaining accurate information on visitor use and conveying essential visitor safety and resource protection information are unlikely to succeed.

NPCA-25

See PTP-7.

Comments

Response to Comments

Commercial Guided Hiking	3/4 modified	<p>would be restricted to 9 am to 9 pm.</p> <p>We support the guided hiking options in Alternative 3 with the following modifications: <i>No guided backpacking should be allowed in the Kantishna Hills until there is a comprehensive plan for management of the Kantishna region.</i> Only educational programs should use the entrance area trails, with the exception of the trails listed in Alternative 4 which could be used for guided hiking.</p>
Guided Sport Hunting	2	Retain the status quo.
Other Commercial Activities	2	Retain the status quo.
Trails	4	While we support the “no formal trails” policy for Denali’s backcountry we recognize that several unplanned social trails exist and that park resources are best protected by constructing trails as needed in the areas listed in Alternative 4. We assume EAs will be written and the public involved when any trail construction moves forward in the park.
Park Road	no choice	We support improved access for non-motorized winter sports such as cross-country skiing, ski-joring, and dog mushing. Any combination of alternatives 1-4 that achieves this goal and is amenable to local users is acceptable.
Campsites	2 modified	We recommend no campsites be designated in the Kantishna Hills as they are not needed at this time. If resource damage appears to be imminent, then NPS should look at options ranging from closing the site to hardening it and creating a designated campsite.
Shelters and Cabins	3	We support facilities at the park entrance that promote opportunities for non-motorized winter recreation.
Information Facilities	3 modified	We don’t support a new facility in the Cantwell/Broad Pass area unless there is a demonstrated need. We recommend changing “would operate” to “could operate”.
Administrative Camps	3	Retain the status quo.
Information & Education	3 modified	We support the educational opportunities outlined in Alternative 3 with the elimination of designated campsites in Kantishna. Designated campsites could be created when and if resource impacts show a demonstrated need.

Denali National Park is the crown jewel of Alaska’s national park system. The Revised Draft Backcountry Management Plan has the opportunity to perpetuate Denali’s uniqueness by protecting its wildlife, natural sound, solitude, and wilderness character IF

Comments

the proper alternative is ultimately chosen. That alternative needs to provide the park superintendent with the management authority to take action to prevent resource impacts and reduce threats that could lead to impairment without the threat of meddling by those with a political agenda. That alternative needs to recognize that extending the Old Park definition of traditional activities to the new park additions would serve to protect many of the park's resources that we feel are at risk. That alternative needs to provide for appropriate visitor use and a high quality visitor experience without changing the park's wilderness character. We trust the Park Service will provide the public with a revision of their current preferred alternative and that the park will be better for it.

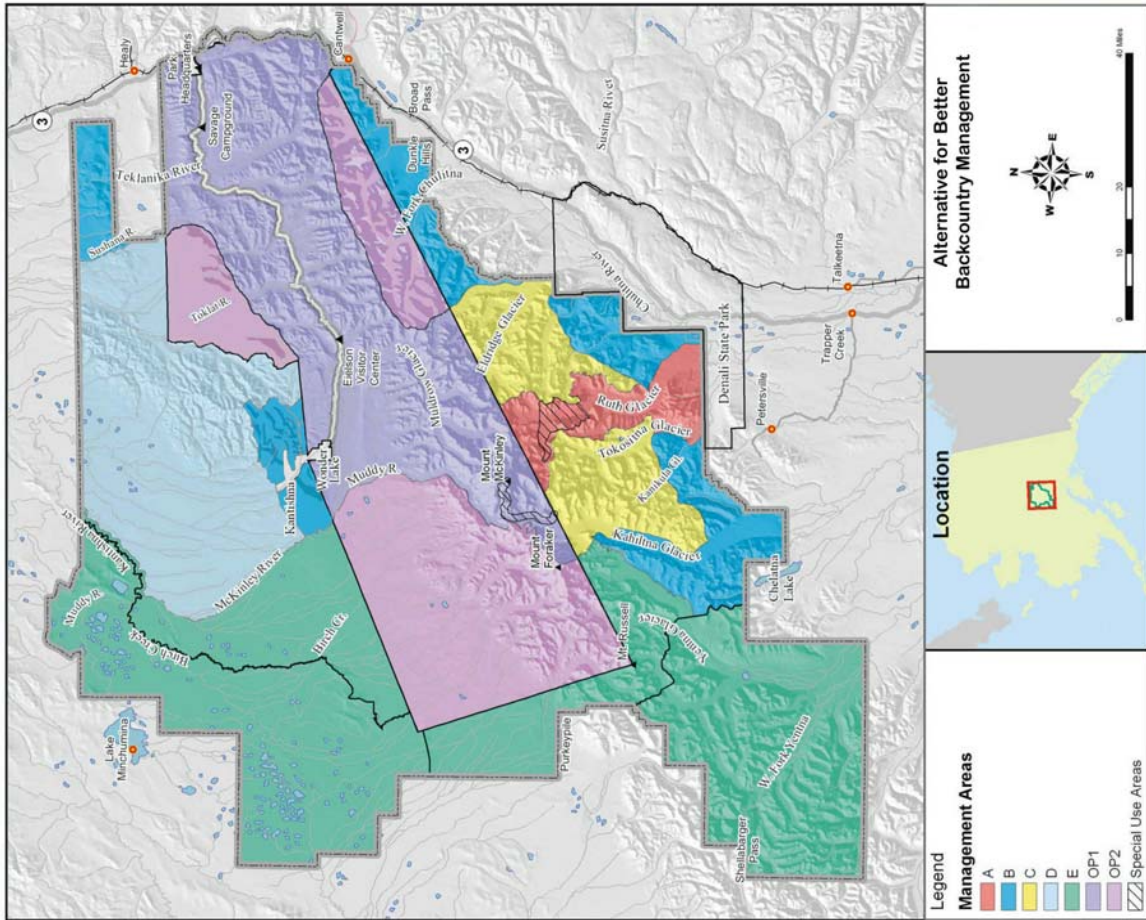
Sincerely,

Jim Stratton
Alaska Regional Director

Response to Comments

Response to Comments

Comments



Denali National Park and Preserve Revised Draft Backcountry Management Plan

Comments

Response to Comments

The Wilderness Society* Alaska Center for the Environment Natural Resource Defense Council *Alaska Chapter of the Sierra Club

July 15, 2005

Paul Anderson, Superintendent
Denali National Park & Preserve
P.O. Box 9
Denali Park, AK 99755

Thank you for the opportunity to provide comments on the Revised Draft Environmental Impact Statement (RDEIS) for Denali National Park & Preserve Backcountry Management Plan (BCMP) prepared by the National Park Service (NPS) and released for public review April 25, 2005. The comments below are presented on behalf of The Wilderness Society, Natural Resource Defense Council, Alaska Center for the Environment and Alaska Chapter of the Sierra Club. These comments supplement the comments previously submitted by our respective organizations on March 15, 2001; July 18, 2002; May 30, 2003 and June 16, 2005. In addition, we incorporate by reference here the comments submitted by the National Parks Conservation Association July 15, 2005.

While we applaud the Park Service for revising the original draft plan, we are disappointed in the Park Service's failure to adequately address our concerns with the February 2003 DEIS and we are deeply troubled by the agency's proposed changes to the underlying management framework and accompanying preferred alternative. We fail to understand how the Park Service can claim an alternative that allows recreational snowmachining in a significant portion of the Park, reduces wilderness suitability and by the agency's own admission allows increased impacts to wildlife, vegetation, natural soundscapes, subsistence and cultural resources meets its legal and policy mandates much less the criteria as the "environmentally preferred alternative" for one of the nation's premier Parks.

The Park Service clearly details in the RDEIS the agency's duty under governing law, regulation and policy to assure that national park resources are protected in an unimpaired state for the benefit and enjoyment of this and future generations. Unfortunately the Park Service then selectively applies them. We respectfully request NPS adopt the *People for the Parks Alternative* as the only alternative that meets the Park Service's law and policy mandates. The *People for the Parks Alternative* provides a better future for Denali National Park and Preserve, a future that supports fully functional ecosystems while providing a range of opportunities for hundreds of thousands of visitors every year to experience Alaska's wildlife and wilderness.

I. SUMMARY OF KEY CONCERNS AND RECOMMENDATIONS

The NPS mission was clearly elucidated by Congress and has been reaffirmed over the years. NPS has an *affirmative* responsibility to implement management actions that ensure full compliance, or go well beyond simple compliance, with law, regulation and policy now and in the future. NPS has an affirmative responsibility to *prevent* impairment of park resources including but not limited to solitude and natural soundscapes. Upon review of the above referenced RDEIS we have found significant failings in the alternatives and the subsequent environmental effects analysis. We are concerned these failings place the extraordinary resources of Denali at risk. We respectfully request NPS adopt the *People for the Parks Alternative* as the only alternative that meets the Park Service's law and policy mandates.

Specifically:

- In describing the current situation, the RDEIS details the Park Service's failure to effectively manage park resource values. By proposing an even less prescriptive management framework than in the 1986 General Management Plan or in the February 2003 DEIS, the NPS fails to fulfill its affirmative management responsibility.
- The desired future conditions framework is designed with so much flexibility it is unclear what if any standards will be mitigated and where. At a minimum, the FEIS must detail a monitoring and

Comments

Response to Comments

- enforcement plan and allow opportunities for public comment. The BCMP can not be implemented until this plan is completed and fully funded.
- The Environmental Consequences Analysis is fundamentally flawed and inadequate under NEPA. NPS measures the impacts of the action alternatives against the illegal activity in the existing conditions as portrayed in the no-action alternative. Furthermore, NPS arbitrarily applies impact levels and impairment findings. NPS must complete a new analysis in the FEIS.
- The preferred alternative violates the Wilderness Act, the National Park Service Organic Act, ANILCA and National Park Service policies by allowing recreational snowmobiling in the 1980 park and preserve additions (New Park).
- NPS recognizes it's legal mandate to protect equally the range of resource values including intrinsic values (solitude, natural soundscape) but the NPS non-impairment findings for motorized recreational uses in the New Park are arbitrary and capricious under the Administrative Procedures Act.
- Contrary to NPS assertions, the preferred alternative does not satisfy NEPA Sec. 101 criteria and therefore can not be the "environmentally preferred alternative", as defined in 40 CFR 1505.2(b).
- Contrary to NPS assertions, a traditional activities definition is necessary prior to NPS adoption of any of the action alternatives.
- NPS fails to adequately address the significant adverse impacts of overflights on Park resources and values. The RDEIS can not assume environmental benefits from "voluntary" guidelines yet to be developed or agreed upon by the interested parties.
- The RDEIS interim soundscape plan fails to meet the agency's statutory and regulatory mandates by arbitrarily allowing significant impacts to the natural soundscape. The Park Service must develop a stronger Soundscape Preservation and Noise Management Plan prior to adopting a preferred alternative that does not allow high and very high noise disturbance thresholds.
- The preferred alternative fails to fulfill NPS statutory and regulatory mandates for designated and suitable wilderness. The Park Service must complete a Wilderness Management Plan prior to adopting a preferred alternative and complete the ANILCA 1317 wilderness review process.

We are encouraged by the Park Service's continued commitment to safeguard the 2 million acre Wilderness core of Denali, the former Mount McKinley National Park (Old Park). The designated Wilderness of Denali has been free of snowmobiles since it was established in 1917 and the NPS June 2000 regulation (65 FR 37863) solidified this long-standing prohibition. **We also applaud** the Park Service's continued strong position on off road vehicles, personal watercraft and airboats (RDEIS p.188 and p.458).

The future of Denali National Park and Preserve is at a crossroads. The choice before the Park Service is simple: to uphold protections of Denali from the adverse impacts of motorized recreation or to allow degradation of this national treasure. The ultimate choice will have a profound and far-reaching impact on all of Alaska's national parks.

II. THE LEGAL AND POLICY FRAMEWORK FOR THE PREEMINENT PARK NPS RESPONSIBILITY: PROTECTION OF RESOURCES

Denali National Park must comply with the Organic Act, the Redwood Act, the Wilderness Act, NPS regulations, NPS Management Policies and Executive Orders 11644 and 11989. The level of motorized access and motorized recreation proposed for the New Park in the RDEIS preferred alternative violates these existing laws and regulations. The purpose of the National Park System is clear: to protect park resources and ensure that visitor use does not cause impairment.

Specific impacts and findings will be discussed in sections III- VII.

A. Highest Standard: The Organic Act of 1916

The National Parks are intended to preserve the nation's treasures in perpetuity. This can only be accomplished by preserving and maintaining each park's special features and the ability of citizens to enjoy those features. When it created the National Park Service in 1916, Congress gave the agency a clear mission:

Comments

Response to Comments

...to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. (16 U.S.C. §1 et seq)

Congress reaffirmed and further clarified the Park Service mission in the 1978 Redwood Act, stating: *...the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park system and shall not be exercised in derogation of the values and purposes for which these various areas have been established....*

The fundamental purpose of parks also includes “enjoyment” of park resources. This enjoyment is meant broadly to include people who visit parks as well as those who derive benefit from simply knowing that our national parks exist. The courts have time and again interpreted the Organic Act as holding conservation of park resources preeminent over enjoyment of them; visitor use must not cause impairment of park resources and values.

Congress provided the National Park Service with the discretion to manage national parks, but limited that discretion by the requirements of the Organic Act that park resources and values be left “unimpaired” for future generations. This duty to avoid impairment establishes the primary responsibility of the National Park Service. “The impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by legislation or by the proclamation establishing the park.” (NPS Management Policies at 1.4.4). The Park Service has an affirmative duty to prevent degradation of park resources and values. “NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values.” (NPS Management Policies at 1.4.3).

Impairment is an impact which affects a resource or value that is “necessary to fulfill specific purposes” identified in formation of the park or “key to the natural and cultural integrity of the park or to opportunities for enjoyment of the park”. (NPS Management Policies at 1.4.5). The “park resources and values” that fall under the impairment standard include scenery, wildlife, natural soundscapes and smell, and all natural process and features. Also not to be impaired is “the park’s role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system.” (NPS Management Policies at 1.4.6).

B. NPS Regulations Are Protective and Presumptive Against Snowmobiles

Snowmobiles are generally prohibited in national parks except when “their use is consistent with the park’s natural, cultural, scenic and aesthetic values, safety considerations, park management objectives, and will not disturb wildlife or damage park resources.” (36 CFR 2.18(c))

Furthermore, even where such use may be consistent with Park Service regulations, the Park Service determined that, given the inevitable adverse impacts of these machines, if “equally desirable [snowmobiling] opportunities exist on adjacent lands,” then “snowmobile use is more appropriate on the adjacent lands which do not have the specific preservation mandate of the National Park Service.” (44 Fed. Reg. 47,413 (1979)).

There are millions of acres of other nearby public lands available for recreational snowmobiling outside of designated Wilderness and National Parks. In fact, the allocation of winter recreational opportunities in the region unfairly and disproportionately favors motorized recreationists over those seeking a quiet recreational experience, and could result in unacceptable environmental harm. For example, the Alaska Department of Natural Resources studied snowmobile access in an area covering 34.3 million acres of federal and state lands in Southcentral Alaska and concluded that about 32.8 million acres—over 95% of the total area—are open to snowmobile use. This study specifically excluded Denali National Park. These lands are generally accessible by highway to major population centers in the state, including Anchorage.

Comments

Response to Comments

TWS-1

See NPCA-18.

The RDEIS acknowledges that quality recreation snowmobile terrain is available outside the Park yet the RDEIS fails to explain why millions of acres of accessible terrain is not enough to satisfy this interest. Furthermore the RDEIS fails to reconcile this decision with the direction in 44 Fed. Reg. 47,413 (1979).

C. NPS Regulations Are Protective and Presumptive Against All Terrain Vehicles (ATVs)

The National Park Service generally considers ORV use to be incompatible with purposes and values in Denali National Park and Preserve. The RDEIS clearly articulates NPS policy. "The use of ORVs is generally prohibited throughout the national park and preserve consistent with existing regulations (36 CFR 4.10, 43 CFR 36.11, EO 11644, and 1986 *General Management Plan*). ORV use can occur on state right of ways and has been authorized in the past. ORVs are not authorized for subsistence purposes under ANILCA 811 because they were not traditionally employed for subsistence purposes" (RDEIS p.459).

The RDEIS did not further address ORV use in Denali. However, we are aware of the on-going effort to review subsistence ORV use in and around Cantwell. The FEIS needs to recognize that there is a process for changing the GMP's no-subsistence use position through a separate "Finding" process, such as the effort in the Cantwell Area. That recognition in the FEIS needs to clearly state that any change to the ORV prohibition will only come about through a determination that shows such use is well established over a long period of time, is multi-generational, and that historically documented community-wide subsistence ORV use occurred on the trail(s) in question prior to the enactment of ANILCA. If a determination is issued, the subsequent subsistence ORV use is subject to reasonable regulation necessary to prevent waste or damage to fish, wildlife, terrain, and other Park resources or values and in such a manner as to prevent the harassment, hazing, or herding of wildlife. Subsistence ORV use should be managed under a permit system and only allowed on designated trails. Until a final determination is made in the Cantwell Area, the RDEIS is clear that subsistence ORV use is not allowed in the park.

D. Executive Orders 11644 and 11989 Prohibit Adverse Snowmobile and ATV Impacts

In the 1970s, with off-road vehicles causing increasing damage to public lands across the nation, Presidents Nixon and Carter signed Executive Orders 11644 and 11989 (respectively). The first required that the Park Service:

ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of these lands..

Executive Order 11644, issued in 1972, directs agency officials to specify, through regulation, the areas and trails on public lands on which ORV use will be permitted. Those areas where ORV use is permitted will be based on, among other things, "the protection of the resources of the public lands," Id at §3(a), and shall "be located to minimize harassment of wildlife or significant disruption of wildlife habitats." Id at §3 (a) (2). Within national parks, such trails shall only be designated "if the respective agency head determines that off-road vehicle use in such locations will not adversely affect their natural, aesthetic, or scenic values." Id at §4. The EO also requires agencies to establish a mechanism to monitor ORV use and impacts and to respond appropriately to such information. Id at §8.

In 1977, EO 11644 was amended by EO 11989. The second order directed that when the Park Service determines:

that the use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands [it shall] immediately close such areas or trails to the type of off-road vehicle causing such effects... (EO 11989 42 Fed. Reg 26959(1977) reprinted in 42 U.S.C. §4321).

E. Recreation vs. Transportation in Parks: A Critical Distinction Upheld by Courts

NPS policy on use of motorized equipment requires that "Where such use is necessary and appropriate, the least impacting equipment, vehicles, and transportation systems should be used..." (NPS Management Policies at 8.2.3). As a transportation system for the parks, snowmobiles clearly fail to meet policy standards. And as a form of recreation, the law is as clear: damaging forms of recreation have no place in national parks.

Comments

Response to Comments

TWS-2

There is an important distinction between the preferred alternative in the *Revised Draft EIS* and the preferred alternative in the original draft. In the original draft plan, the National Park Service proposed a special regulation to open portions of the park additions and preserve to recreational snowmachine use. In the *Revised Draft EIS* and *Final EIS*, the National Park Service proposes no such authorization. Snowmachine use that occurs is assumed to be only for “traditional activities,” village-to-village travel, and subsistence purposes, although a very limited provision is included to provide for recreational snowmachine access on winter season corridors if wilderness designation occurs in the future. The use of snowcoaches for winter recreation access was considered and dismissed as an alternative in the *Revised Draft EIS*, p. 79. Air taxis would continue to provide winter access in the park additions and preserve in the modified preferred alternative.

The District Court of Utah recently clarified that the Park Service is not in the business to provide recreational opportunities if those recreational pursuits contravene NPS policy and the Organic Act. Protection of the resource comes first and all visitor access must be in harmony with preservation. (Southern Utah Wilderness Alliance v. Dabney, (1998 WL 703956 (D. Utah)). At issue was the “right” of four-wheeled drive enthusiasts to recreate in sensitive riparian areas in Canyonlands National Park. The Court based its decision to deny continued access on the Organic Act.

The relevant provision of the Organic Act provides that the Park Service is to “regulate the use of” national parks by means that conform to their “fundamental purpose”; namely: “to conserve the scenery and natural historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations”. (Organic Act (16 U.S.C. §1a-1).

The Court went on to clarify the oft-cited Organic Act notion of “visitor enjoyment”; user groups attempt to broaden the concept of “visitor enjoyment” to denote a right to recreate in or access the parks in any way seen fit. The Court disagreed. “[V]isitor enjoyment” as used in the statute refers to visitor enjoyment of park scenery, wildlife, and natural and historic objects that are to be preserved. As used in this sense, visitor enjoyment does not refer to visitor enjoyment of outdoor recreational activities. Opportunities for outdoor recreation are provided on lands managed by the Bureau of Land Management and the Forest Service....[G]iven...the availability of less-invasive forms of access, permanent impairment...in order to permit the continued use [of four wheel drive vehicles in Salt Creek Canyon] cannot be reconciled with the Organic Act’s overarching goal of resource protection.” (Southern Utah Wilderness Alliance v. Dabney (1998 WL 703956 (D. Utah)).

Even if NPS continues to try to rationalize that snowmachines are merely a form of “access to wilderness recreation”, the agency never analyzed alternative winter transportation options i.e. snowcoaches and/or airplanes. Without that analysis NPS violates management policy 1.4, which requires NPS to determine the most reasonable alternative.

F. NPS Policy Requires Highest Protection and Restoration of National Parks

NPS Management Policies of 2001 cover all of the impact areas addressed in the RDEIS. The “General Management Concepts” of the policies build upon the overarching policy that “preserving park resources and values unimpaired is the core, or primary, responsibility of NPS managers.” (NPS Policies at 4.1). To fulfill this primary responsibility, it is necessary that “[i]n cases of doubt as to the impacts of activities on park natural resources, the Service will decide in favor of protecting the natural resources.” (NPS Policies at 4.1). Moreover, NPS is directed to go beyond protection to restore natural systems. “The Service will seek to return human-disturbed areas to the natural conditions and processes characteristic of the ecological zone in which the damaged resources are situated.” (NPS Policies at 4.1.5). This restoration may be accomplished through means such as “restoration of natural soundscapes”. (NPS Policies at 4.1.5).

III. New RDEIS Management Framework a Risk to Park Resources

Pursuant to its Organic Act, the Park Service must manage Denali National Park and Preserve so as to “conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them *unimpaired for the enjoyment of future generations*.” 16 U.S.C. §1 (emphasis added). This preservation mandate is further enforced by the Redwood Act amendments to the Organic Act. This mandate is consistent with Section 202(3)(a) of the Alaska National Interest Lands Conservation Act (ANILCA). Section 203 of ANILCA expressly directs the Park Service to manage new and redesignated units of the park system in accordance with the Organic Act.

The Park Service must recognize that while it may have the discretion to choose the most appropriate tool or mechanism to achieve its desired future resource and social conditions for a particular area, it must adhere to its Congressionally mandated duty to manage the park in a way that ensures its scenery, natural and historic objects, and wildlife will be preserved and left *unimpaired* for the enjoyment of future generations. Park managers must act to *prevent* impairment of park resources.

Comments

While the concept of designing management plans based on “desired future conditions” allows the Park Service access to a broad array of tools to prevent impairment of park resources, the use of these tools is necessarily dependent on comprehensive monitoring and enforcement. Without the proper funding for such monitoring and enforcement, the Park Service will be ill-equipped to prevent impairment to park resources or to even assess the levels of impairment. In an era where the Park Service is struggling to secure funding for even basic operational expenses, it does not seem wise to tie the success of an entire management plan to such drastic funding increases.

The Environmental Protection Agency raised significant concerns with the management approach in the February 2003 DEIS which was even more prescriptive than the framework in this RDEIS. “Once the precedent for broader snowmachine use is established, it may be difficult to eliminate or even curtail it later, even if environmental impacts prove significant or conflicts between subsistence use and recreational use become more common....We are concerned with the approach because under the proposed plan, protection of environmental resources in the Park additions from snowmobiles would rely heavily on enforcement and monitoring (RDEIS, p. 472).

We feel this proposed approach, if not properly implemented with full funding, will lead to impairment of park resources by providing too much flexibility to political influences that would question identified impacts with a desire for “more study,” and would weaken or postpone management actions necessary to protect impacted resources. Critical to this whole management approach is timely identification of real or probable changes or impacts to Desired Future Conditions with enough support so that clear and decisive management action can be taken in a timely manner so as to protect park resources. Park Superintendents must be given the authority to take action when they see or anticipate a problem.

Allowing the Superintendent to take action based on what he/she sees or anticipates as impacts to Desired Future Conditions is critical to the success of this management approach. The plan must be clear that both the authority to monitor and the authority to take action lies with the Superintendent. The plan must be clear that if a Superintendent anticipates that an action could or will cause impairment, they are empowered to act **BEFORE** damage occurs to control or restrict a harmful recreational activity. Anticipating and preventing damage to park resources is more important than reacting to impairment once it starts to occur. The Superintendent must be able to take action as he/she sees fit to respond to actions that are impairing park resources or that **COULD** impair park resources. Should there be any question of the impact level, the plan must also provide the Superintendent with the direction to err on the side of caution.

Unlike much of the world, Denali National Park and Preserve sustains a vast functioning ecosystem. That ecosystem functions because of 89 years of strict protective measures taken by the National Park Service. Ecosystems can be significantly modified by human actions, often to the detriment of that ecosystem's sustainability. The cost of rebuilding or rehabilitating an impacted ecosystem is oftentimes staggering. At Denali we have done it right the first time, so far. Aldo Leopold said that the first rule of tinkering is not to throw away all the pieces. We have the pieces at Denali and to sustain and perpetuate that functioning ecosystem, the Superintendent must be given the authority to err on the side of the conservative. If he/she later finds that a rule, regulation, or emergency order was too strict, it can be loosened. It is virtually impossible to take an action that is too permissive, and damaging to the resource, and tighten it up. Caution is the key word and the plan must be explicit in its direction to embrace the precautionary principle.

One only has to look at the complete failure of this management approach in Yellowstone National Park to understand why this is not a solution for Denali. In the 1990's the level of recreational snowmachine use spiraled out of control. The Park Service crashed through it's target maximum threshold in the second year of a ten year winter use management plan but the Park Service lacked the political will to effectively implement the necessary tools to prevent impairment. At the end of the day, despite good intentions, the management framework failed dramatically to protect Park Resources and Park employees.

A. Monitoring Plan Must Be in Place Prior to Signing the Record of Decision

The Achilles Heel to this whole plan is the monitoring program. In times of limited funds, we are very concerned that funding for the monitoring necessary to properly implement this plan simply will not be available, leaving wilderness, wildlife, solitude, natural quiet and other park resources at risk. Key among

Response to Comments

TWS-3

See NPCA-1 and PFP-4.

Comments

these impacts are those from recreational snowmobiling, an activity that the NPS preferred alternative says can occur in the four million acres added to the park in 1980.

4

We ask that the Park Service not implement this plan until a monitoring program is fully developed in partnership with the public, including formation of a Citizens Advisory Committee, and fully funded in the operating budget of the park. Major details of and a specific implementation timeline for the monitoring program should be included in the FEIS and the Record of Decision (ROD), as discussed in Council on Environmental Quality's (CEQ) "Forty Most Asked Questions Concerning CEQ's NEPA Regulations. Question 34c states, in part, that "the discussion of mitigation and monitoring in a Record of Decision must be more detailed than a general statement that mitigation is being required." Detail, which is lacking in the RDEIS, must be included in FEIS and the ROD.

5

The FEIS and ROD must also discuss the necessary funding for the monitoring plan. Will there be new funding made available to implement the monitoring program? If no new funds are made available, how does the Park Service propose to monitor its Desired Future Conditions with existing staff that is already overloaded with work? We endorse the idea of an Advisory Committee to assist with developing and implementing the monitoring program.

6

As the Superintendent monitors the Desired Future Conditions, there must be clear standards and indicators for when these conditions are met or exceeded. Key to monitoring these standards and identifying any changes in the indicators is a solid understanding and documentation of existing conditions and, better yet, conditions as they were when ANILCA passed. The discussion of standards and monitoring in the Actions Common section do reference "existing data." That data should be in this plan. We find it impossible to determine if we can endorse or support the standards established in the plan without any data showing how these proposed standards relate to what is actually happening on the ground right now or, better yet, during the time since ANILCA passed. There very much needs to be baseline data against which to measure the efficacy of these proposed standards. We are concerned that the extent of existing baseline data is not sufficient to support a monitoring program that can withstand scrutiny from those that will oppose any restrictions or closures. Are existing conditions already exceeding the standards?

7

The methodology for measuring change over time for those standards that include encounters with people or human disturbance relies on a visitor survey conducted every five years. Where did five years come from? That seems too long a time period. There can be significant shifts in recreational visitation, with resulting potential impacts to park resources, in only one year (12.3% increase from 2003 to 2004), what could happen if there was this much increase in each of five years without any monitoring by NPS? Backcountry camping has changed as much as 25% (1993 to 1994) in one year, though shifts in the 10%/year range are more common. Still, if we increased 10%/year over 5 years, NPS would be looking at a 50% increase.

As the visitor survey seems to be the primary tool by which you are basing your monitoring plan, we suggest that all survey data collection be done on an annual basis for at least the first five years after which adjustments can be made for a longer time period if it can be shown a longer time period will to impact the quality of data needed track changes to the backcountry conditions that make Denali such a desirable place to visit.

8

For changes in physical conditions to trails and campsites you only cite "field observations" to describe how these will be monitored. The plan needs to include much more information about these "field observations," such as who is making these observations? How often are they made? Weekly? Monthly? Seasonally? What form will this data be collected so that it can withstand the scrutiny it undoubtedly will receive when it is used by park managers to seek restrictions or closures based on resource impairment? There must be a rigorous data collection plan so that all data is uniformly observed, cataloged, and evaluated so it CAN withstand such scrutiny.

B. RDEIS Soundscape Plan Illustrates Failure of Management Framework

The RDEIS acknowledges that natural sounds are "inherent components of the scenery and the natural and historic objects and wild life" protected by the NPS Organic Act, and the Park Service must "protect and

Response to Comments

TWS-4

See PFP-4, DCC-32, and NPCA-8.

TWS-5

See NPCA-9.

TWS-6

Clear indicators and standards are presented in Tables 2-1 to 2-9 and associated text. Data that the National Park Service presently has is presented in the plan, either in Chapter 3: Affected Environment or Chapter 4: Environmental Consequences (for example, see the "Natural Sounds" sections of both chapters and the Visitor Use section of chapter 3). The National Park Service recognizes that it would be desirable to have more extensive data that describe current conditions. However, as articulated in the answer to AOPA-1 the National Park Service can and should develop provisional standards in the absence of complete data. The desired conditions described provide for a high level of resource protection.

TWS-7

See NPCA-5.

TWS-8

The Monitoring section of Table 2-2 provides a three-tiered approach to monitoring trail and campsite disturbance impacts, including specific variables, a system for determining locations to be monitored, and a monitoring frequency. Additional detail would be developed during implementation, and would rely on rigorous scientific methodology. Much of the monitoring of these impacts would be accomplished in conjunction with existing vegetation monitoring that takes place as part of the Central Alaska Network's Vital Signs program, and would require little added expense. See also PFP-4.

Comments

restore natural soundscapes as it would any natural resource of the parks” (RDEIS p.133). Despite this recognition that the National Park Service is obligated pursuant to the Organic Act to protect and preserve natural soundscapes as a park resource, the RDEIS fails to meet this mandate by arbitrarily allowing significant impacts to natural soundscapes.

An inherent flaw in the soundscape plan, and one present throughout the Environmental Consequences Analysis, is the use of the no-action alternative as a baseline for measuring the impacts of the action alternatives. Such comparisons result in unacceptably high impacts. While the RDEIS recognizes these cumulative impacts to the natural soundscape, they are summarily and arbitrarily dismissed in each action alternative.

This arbitrary approval of significant impacts is perhaps best illustrated by the establishment of “high” and “very high” threshold levels in the action alternatives. Such thresholds permit substantial impacts to the natural soundscape and are a violation of the Park Service’s nonimpairment mandate under the Organic Act. Additionally, the RDEIS recognizes that the established threshold levels, as applied under the various action alternatives, will often be exceeded at the very outset of implementation.

The RDEIS fails to address what actions, if any, will be undertaken to prevent the impacts associated by these threshold violations, or when such actions will be initiated. This is exacerbated by the lack of a detailed monitoring and enforcement plan. These threshold violations, as well as the lack of adequate mitigation to address the accompanying impacts, violate the Organic Act.

The RDEIS soundscape plan fails to meet the agency’s statutory and regulatory mandates. The Park Service must develop a stronger Soundscape Preservation and Noise Management Plan prior to adopting a preferred alternative that prevents impacts to park resources.

C. NPS Must Complete a Wilderness Management Plan

Wilderness Plans and Backcountry Plans are not equivalent documents. NPS Management Policies state that all parks with wilderness resources must have wilderness plans or equivalent documents. In order for a backcountry plan to be an “equivalent document” it must contain the area specific objectives and prescriptions needed to maintain wilderness qualities and attributes. The RDEIS encompasses both wilderness and non-wilderness resources and as such is not focused adequately on protecting the area’s unique wilderness qualities.

The Wilderness Act is different than the NPS Organic Act and as such dictates a different management regime. Wilderness resources are distinct from other NPS backcountry resources and to maintain their unique qualities that qualify them as wilderness or potential wilderness they need to be managed as distinct areas within the NPS. Further, “as wilderness is a composite resource with interrelated parts, its management must be focused on the whole, comprehensively not on its component parts. For wilderness, therefore, one should not develop separate management plans for vegetation, wildlife or recreation [or fire]. Rather, one plan must deal address comprehensively with the interrelationships between these and all other component parts of the wilderness resource [Hendee and Dawson 2002, p. 193].

Wilderness management is a struggle to maintain the qualities and attributes of an area that led to its being identified as having wilderness potential, or to its designation as Wilderness. These conditions are, as stated in the Wilderness Act. A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are *untrammeled by man*, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its *primeval character and influence, without permanent improvements or human habitation*, which is protected and managed so as to preserve its natural conditions and which (1) *generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable*; (2) *has outstanding opportunities for solitude or a primitive and unconfined type of recreation*; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value. 16 U.S.C. § 1113 (e)(emphasis added).

Response to Comments

TWS-9

This comment inaccurately characterizes the National Park Service environmental impact analysis. For natural soundscapes, as for other resources, each analysis identifies the impacts that have occurred or are likely to occur outside of the scope of plan actions, identifies the impacts that would be caused by the actions proposed in the plan, and then identifies the cumulative effects of the actions in the plan plus the other past, present, and future actions. The no-action alternative is provided for comparative purpose, but in no way serves as a “baseline” for evaluating impacts. The National Park Service does, however, indicate when the actions in the plan change from current conditions, and indicate when current conditions are adversely affected under existing use. Thus, in the preferred alternative it is correct to assert that the natural soundscape of the park has a major cumulative adverse impact from motorized access (primarily airplanes, most of which never enter NPS’s regulatory jurisdiction), while at the same time concluding that the actions in the preferred alternative would result in negligible additional adverse impacts to the existing cumulative impacts. The final conclusion states that there are ongoing major adverse cumulative impacts, which this action does not correct.

The establishment of “high” and “very high” standards for natural sound disturbance is not arbitrary, but calculated to allow higher levels of motorized access in some areas of the park and preserve while minimizing the geographic extent of highly impacted areas. This focuses high levels of disturbance in just two particular areas to serve explicit park purposes (see NPCA-16). As a result, the National Park Service believes that the non-impairment standard articulated in the introduction to Chapter 4: Environmental Consequences is met. The high level of protection afforded the natural soundscape over 94% of the park and preserve and the limits placed on soundscape degradation over the remaining 6% of the park and preserve seem adequate to claim that the natural sound resource would continue to “fulfill the specific purposes identified in the park’s establishing legislation” and “its role in maintaining the natural integrity of the park.”

TWS-10

The preferred alternative of the *Revised Draft EIS* and the modified preferred alternative in the *Final EIS* clearly express the tools that the National Park Service has available to respond if thresholds (standards) are approached. As described above, the National Park Service is fully able to take proactive action to respond to changes in visitor use if it believes the standards would be exceeded in the future; the agency does not have to wait

response continued next page

Comments

Management by reaction works against wilderness preservation goals because management direction can easily be shaped by a succession of minor decisions. The cumulative results of such decisions may be undesirable and hard to reverse in wilderness. Unplanned management can be recognized by a shifting of focus from problem to problem, inconsistent, conflicting actions, and a loss of overall direction towards wilderness preservation goals. [Hendee and Dawson 2002, p. 210.]

IV. SNOWMOBILES IMPAIR PARK RESOURCE AND VALUES SNOWMOBILES VIOLATE NPS GUIDING LAW, REGULATION, AND POLICY

A. NPS Issues June 2000 Finding that Snowmobiles Impact Resource Values in the Old Park
For over two years, the Park Service analyzed the published literature related to snowmobile impacts and applied those studies to examine the impacts on the resource values of the Old Park should snowmobile use be allowed there. In June 2000, the Park Service published a "Statement of Finding, Permanent Closure" that analyzed and discussed a number of key issues, including:

- the detrimental effects that snowmobiles would have on wildlife, vegetation, soils, and air and water quality of the Old Park;
- the degradation of the pristine air and water quality within the Old Park that would be caused by snowmobile use there;
- the conflicts that snowmobile use in the Old Park would create with historically-occurring recreational uses and resource values;
- the interference snowmobiles can present to subsistence opportunities on nearby state and federal lands.

In the June 2000 "Statement of Finding, Permanent Closure" the Park Service found that snowmobiles in the Old Park would cause wildlife to abandon Old Park habitat, alter historic predator-prey relationships, and directly harm individual animals through intentional harassment by snowmobile riders. The Park Service also found that snowmobiles would diminish the Old Park's pristine air and water quality, help create permanent trails, and damage vegetation. Finally, the Park Service found that snowmobiles would degrade the experience of visitors to the Old Park year-round by leaving visible trails across the tundra and shattering the natural soundscape over large geographical areas.

These studies represented the culmination of three years of public involvement and Park Service study. In the end, over 300 Alaskans testified at public meetings, and over 7,400 people submitted public comments on the proposed regulatory closure of Old Denali.

B. NPS Acknowledges that New Park Resource Values are the Same as Old Park Resource Values
The RDEIS acknowledges that the values of the lands determined suitable for wilderness designation in the New Park are the same as the values in the Old Park. The level of proposed motorized recreation and motorized access in the preferred alternative far surpasses the level of motorized activity considered detrimental in the NPS. "Statement of Finding, Permanent Closure." June 2000. Furthermore, under Section 1110(a) of ANILCA, as well as other laws, NPS has a responsibility to ensure that any new activity or change in existing activities does not have a detrimental effect on resource values. Section 1110(a) provides for closure by the Secretary of the Interior if use "would be detrimental to the resource values of the unit or area." Thus, in meeting its responsibilities, NPS need not wait for actual physical damage to occur before taking protective action to prevent degradation to wildlife and other natural resources. In light of these facts, the RDEIS fails to adequately justify a non-impairment finding.

C. The Park Service Should Not Change Existing Law to Authorize Snowmachine Use in Denali
There are currently only four ways that the Park Service may potentially authorize snowmachine use in national parks: 1) on specific routes that have been designated by special regulation (36 C.F.R. §2.18); 2) for the continuation of certain traditional activities, subject to reasonable regulation (16 U.S.C. §3170(a), 43 C.F.R. §36.11); 3) for subsistence, where appropriate and subject to reasonable regulation (16 U.S.C. §3121, 36 C.F.R. §13.46); and for access to an inholding, following application for and issuance of a right-of-way permit (16 U.S.C. §3170(b) and 43 C.F.R. §36.10).

Response to Comments

for damage to occur. A detailed monitoring plan is an implementation level step, and the guidance given for monitoring is sufficient for a general management plan document.

TWS-11

See NPCA-20.

TWS-12

Although the wilderness resource values of the park and preserve addition lands are the same as those of the designated wilderness of the Old Park, the National Park Service believes there is a distinction between the two when determining detriment. As pointed out in the 2000 *Environmental Assessment for Permanent Closure of the Former Mount McKinley National Park to Snowmachine Use*, the Old Park was closed to snowmachine use prior to ANILCA. Thus, there was no existing pattern of use in the Old Park. That EA also provided evidence that the Old Park was inadvertently included within the special access provisions of ANILCA, and that the inclusion had not been intended by Congress. By contrast, Congress clearly did intend that some level of snowmachine use continue in the park additions, including that permitted by ANILCA section 811(b) for subsistence purposes and by 1110(a) for traditional activities and travel to and from villages and homesites. So while the wilderness resource values are the same for the Denali Wilderness and the park and preserve additions, the standard for detriment is different.

The analysis in this *Final EIS* demonstrates that snowmachine use would not cause impairment under the modified preferred alternative.

Comments

13

Before the Park Service may authorize snowmachine corridors or designated routes, the agency would be required to promulgate special regulations setting out such routes. 36 C.F.R. §2.18. This would only be possible if the Park Service concluded that snowmachine use was consistent with the park's natural, cultural, scenic, and aesthetic values, safety considerations, park management objectives, and that it would not disturb wildlife or damage park resources. Id. at §2.18(c). We do not support such regulatory designations in the Denali Additions.

Before the Park Service may authorize dispersed snowmachine use for recreational purposes, the Park Service would need to promulgate new regulatory authority. To do so would represent a relaxation of the mandates in 36 C.F.R. §2.18, which we feel would be inappropriate. While such a relaxation may perhaps be authorized under 36 C.F.R. 1.2(c), we feel that this course would be ill-advised due to the detrimental impacts that dispersed snowmachine use would have on a number of resources of the Park.

In addition, for NPS to guarantee recreational snowmachine use on a par with the guaranteed use of snowmachines for traditional activities under Section 1110(a), a change to ANILCA would be required. We do not support any such changes. We recommend against adoption any of these types of regulatory or statutory changes to allow snowmachine use in Denali to occur, or taking any actions in the Plan that would require their adoption.

14

D. NPS Must Adopt the Old Park "Traditional Activities" Definition for the New Park

The Park Service recognizes throughout the RDIES that snowmachine use -- including purely recreational use -- has grown in the New Park in ways that were not foreseen or planned for by the agency. All of this expanded snowmachine use -- both current and prospective -- appears to be illegal: it is not occurring on routes designated by special regulations pursuant to 36 C.F.R. §2.18, and it is not for subsistence or for a traditional activity for which Congress meant to preserve access. The "no action" alternative is consistently held up as an example of what NOT to do, because of its reactionary posture and the resulting environmental impacts.

The Park Service repeatedly shuns the "hands-off" approach taken in the past as exemplified by the "no action" alternative, yet it refuses to proactively define "traditional activities" for the New Park and limit the uses occurring there accordingly. The NPS should not allow the existing pattern of laissez-faire management to continue. . .

It should be noted that in adopting a definition for the New Park, the Park Service may not include purely recreational pursuits among those traditional activities for which Congress preserved access in Section 1110(a). Purely recreational activities were simply not meant to be included in "traditional activities" in Section 1110(a). While it may have made sense to apply a definition to the New Park in a process separate from the Old Park due to their unique management histories, it is only the *application* that should be different -- the definition should stay the same. Congress in Section 1110(a) meant to preserve access for a limited universe of activities -- not including recreation. In our thorough review of the legislative history we have found no evidence to the contrary, and in the multiple rounds of federal court litigation, those urging such an expanded definition have pointed to none. Surely, in all of the legislative history, Congress would have said so if that was what it intended. But it did not.

Those advocating for including recreational snowmachining in the definition of "traditional activities" are attempting to create an exception that would overwhelm the rule. Section 1110(a) is titled "special access," and that is just what it provides -- special access that accommodates the unique rural Alaska lifestyle in which individuals use federal lands for utilitarian, consumptive activities. Section 1110(a) represents the balance in ANILCA between, on the one hand, preservation and protection of conservation lands and, on the other hand, preservation and protection of access to such lands for traditional activities. Inclusion of recreational snowmachining in the definition of "traditional activities" would upset this delicate balance and be contrary to the intent of ANILCA.

This need to prohibit expanding illegal recreational snowmachine use is based not only on NPS regulations but also on the mandates of the NPS Organic Act and its implementing regulations. Snowmachines have been widely acknowledged to have significant impacts on wildlife, air and water quality, vegetation and

Response to Comments

TWS-13

Neither the preferred alternative of the *Revised Draft EIS* nor the modified preferred alternative of the *Final EIS* authorize recreational snowmachining in the park additions or preserve. See TWS-2, PFP-5, TWS-16.

Snowmachine use that occurs legally in Denali is either for traditional activities or travel to and from villages and homesites (ANILCA 1110(a), 43 CFR § 36.11(c)) or for subsistence purposes (ANILCA 811(b), 36 CFR § 13.46(a)). The "Corridors" that could be designated under the modified preferred alternative are not intended as snowmachine routes under 36 CFR §2.18. These are management area designations that allow higher levels of use than the surrounding area, but they provide no additional authorization for snowmachine access. The modified preferred alternative does suggest that in the event of future wilderness designation these winter season Corridors could provide routes for recreational snowmachine access.

TWS-14

See PFP-5.

Comments

soils, wetlands, and Wilderness values and users. See NPS, "Statement of Finding: Permanent Closure of the Former Mt. McKinley National Park," June 2000; NPS, "Environmental Assessment for Proposed Permanent Closure," Nov. 1999.

The Park Service analyzed and documented these impacts in the Environmental Assessment and Statement of Finding for the permanent closure of the Old Park to snowmachine use. In those documents, the Park Service found that the use of snowmachines in the Old Park would have a detrimental impact on the myriad resource values found there. The agency found that Section 1110(a) of ANILCA, as well as other laws, imposed a responsibility "to ensure that any new activity or change in existing activities does not have a detrimental effect on resource values." NPS EA at 27. The Park Service also found that it must close an area if a use "would be detrimental to the resource values" of an area, and that "in meeting its responsibilities, NPS need not wait for actual physical damage to occur before taking protective action to prevent degradation to wildlife and other natural resources." *Id.*

In the RDEIS the Park Service acknowledges that "the values of lands determined suitable for wilderness designation in the park additions are the same as the Old Park. Thus the Park Service's allowance of snowmachines in the vast majority of the additions that were identified as suitable for Wilderness designation is contrary to law, since it will cause detrimental impacts to resource values. The Park Service must prevent these snowmachine impacts to resource values before they occur. If they are allowed to occur, they will constitute an impairment of the resource values of the affected Park and Preserve.

In the RDEIS the Park Service acknowledges these widespread and serious impacts from snowmachine use, yet it authorizes snowmachining and thereby does not prevent the impacts. The Park Service must maintain the scenery and natural environment of Denali National Park and Preserve unimpaired for the enjoyment of future generations, and cannot allow any permanent damage to park resources. 16 U.S.C. § 1. The direct, indirect, and cumulative impacts from expanded snowmachine use rise to the level of impairment.

E. ANILCA 202(3) Provides for Reasonable not Unlimited or Unregulated access

When applying the purposes expressed in Section 202 of ANILCA, we urge the Park Service to give effect to each word and to view the provisions in context with the other laws and provisions that remain applicable to Denali – the NPS Organic Act, the Wilderness Act, NPS regulations and executive orders, and NPS Management Policies. Only by doing so can the Park Service fully implement the will of Congress to protect this wild and undeveloped Park.

In applying the legislative mandates applicable to Denali National Park and Preserve expressed in Section 202(3), the Park Service should view access provisions in context with the other purposes for which the Park was set aside. For instance, when considering the direction to provide "reasonable access" for "wilderness recreational activities," we urge the Park Service to view this in conjunction with its mandate to maintain the habitat for and populations of fish and wildlife. Park Service studies have clearly established that snowmachine use damages wildlife habitat by altering vegetative cover, as well as harming wildlife populations by changing distribution patterns due to harassment and creation of artificial travel corridors. When considering any potential mode of access for a wilderness recreation activity, the Park Service must test them against these equally-important Congressional mandates.

Congress provided for "reasonable access" for wilderness recreational activities. This shows an intent by Congress to limit the universe of potentially-permissible modes of access. For instance, any mode of access that would degrade Park values, impact fish and wildlife habitat or populations, or that would impact solitude or scenic beauty would necessarily be unreasonable. When considering any means of access for any "wilderness recreational" activity, the Park Service should first evaluate whether that means of access is indeed "reasonable" given the purposes for which the area was set aside, keeping in mind that what may be reasonable in some areas of the country is not reasonable in designated or suitable Wilderness.

The Park Service should be aware that it does not need to permit every possible mode of access in an attempt to provide "reasonable access" for "wilderness recreational activities." The provision for "reasonable access" is in the general "purposes" discussion for Denali National Park and Preserve, and does not trump the specific provisions of the Wilderness Act that apply to the designated Wilderness (and,

Response to Comments

TWS-15

See above, TWS-12.

TWS-16

The National Park Service agrees that "reasonable access" for wilderness recreational activities does not mean unregulated access, nor does it mean every mode of access must be allowed. The modified preferred alternative does not claim that snowmachines use is allowed in the park additions and preserve to provide such "reasonable access"; snowmachine use is allowed only for traditional activities, subsistence activities, and village-to-village travel (see TWS-13). The plan does suggest that in the event of wilderness designation, the designated winter season Corridors could be used to provide recreational access by snowmachine along the Tokositna River and to the Old Park boundary in the Dunkle Hills area. The National Park Service believes that this type of limited access by snowmachine could be considered reasonable for that portion of the park additions, even if the area were designated wilderness.

15

16

Comments

by application of the NPS 2001 Management Policies, all suitable Wilderness) of Denali National Park and Preserve. The Wilderness Act prohibits the introduction of new motorized uses into designated Wilderness. Nothing in ANILCA changes that regime for Denali, where according to the 1986 General Management Plan, the use of snowmachines is "neither traditional nor necessary for wilderness recreational activities." We urge you to reaffirm this position, and to apply it by prohibiting the use of snowmachines in designated Wilderness and suitable Wilderness lands in Denali National Park and Preserve -- even for any alleged "wilderness recreational activity."

We urge the Park Service to apply the "reasonable access" and "wilderness recreational opportunities" provisions in the enabling legislation for Denali National Park and Preserve conservatively, by viewing them in context with the purposes for which the Park was set aside and with other federal-land conservation laws. In declaring the purposes of Denali, Congress simply did not mean to mandate any and all means of access, for any and all outdoor activity. On the contrary, Congress meant to allow people to continue to enjoy this Wilderness park in its wild and pristine state.

V. AIRPLANE LANDINGS and AIRCRAFT OVERFLIGHTS

Growing demand for flightseeing tours has dramatically increased air traffic over our nation's National Parks. By some estimates, Denali is second only to the Grand Canyon now as the Park with the most congested airspace. In just ten recent years, from 1991 to 2001, the number of scenic landings on the Ruth Glacier increased more than 800%, from 220 to 1800. In 2002 aircraft were audible in more than 50% (maximum 80%) of the sound monitoring samples collected every five minutes between 8 a.m. and 8 p.m. on good weather days in the Ruth Glacier area. Denali Wilderness Program Manager Joe Van Horn was quoted in a 2003 Ned Rozell column in the Daily News as saying: "I think it's probably the most common negative report we get back, other than mosquitoes and rain. I've been here for 23 years and I think the increase in aircraft-related noise is the single biggest change in the park's wilderness character that I've noticed."

The swelling use has increased conflicts with hikers, climbers and local property owners. Natural quiet and the opportunity to hear and enjoy natural sounds are rapidly disappearing on nearly all of Alaska's accessible public lands. Denali is so far no exception, but it ought to be. The Park Service should do whatever it takes to establish meaningful overflight regulations and limits on scenic tour landings. To achieve desired future resource conditions, NPS must adequately address both flight patterns and levels of use.

A. National Park Overflight Act Provides a Valuable Framework

The 1987 National Park Overflight Act provides a valuable framework for restoring natural sounds, reducing wildlife harassment and minimizing visitor conflicts. The Act calls for development of Air Tour Management Plans and recommends a litany of methods for resolving airspace issues. These tools, as well as the guiding principles for their use spelled out in the Act, should provide the foundation for Park Service management direction in Denali.

B. RDEIS Provides Inadequate Direction to Reduce Adverse Impacts from Overflights

While the RDEIS recognizes there has been an enormous increase in air tour and transport services throughout Denali National Park and Preserve, the RDEIS fails to outline sufficient steps to reduce the adverse impacts from overflights. The preferred alternative recommends establishing a voluntary Aircraft Overflights Working Group but fails to outline the specifics of how an undefined voluntary working group can help the agency meet its management objectives. In fact the RDEIS does not even mention or include the proposed Flightseeing and Air Taxi Route maps included in the NPS Winter 2001 Edition of the Denali Dispatch.

C. NPS Must Develop Overflight Agreements Prior to Completing the BCMP

NPS must develop interim operating agreements between NPS, FAA and air tour operators prior to completion of the Backcountry Management Plan. Where possible NPS must include incentives and restrictions in air taxi concession permits. Without these agreements in place, it is impossible for NPS to accurately assess the environmental consequences of each alternative.

17

18

Response to Comments

TWS-17

As a GMP amendment, this planning document focuses on setting goals for the backcountry of Denali, and identifies tools that can be used to meet these goals. During the planning process it was recognized that it was premature to specify particular routes for flightseeing or air taxi use when there was no broader shared understanding of what goals were to be accomplished and when the National Park Service had no authority to regulate airspace. Once the modified preferred alternative goes into effect, the Aircraft Overflights Working Group would address specific methods by which the goals could be accomplished.

TWS-18

There is no requirement or need for the National Park Service to enter into an agreement with FAA over management of air tours prior to completion of the BCMP. Air taxi and scenic tour operators who land in the park do so under a concession contract. A prospectus for a new contract consistent with the terms of the plan would be issued following the Record of Decision. For overflights that do not land, the National Park Service intends for the Aircraft Overflights Working Group to consider a variety of means for achieving desired conditions for the soundscape of the park, including some of the ones mentioned in the comment. Regulation might not be necessary to achieve these goals, but remains an option within the Access Management Tools. The National Park Service believes that the actions proposed in the plan would achieve the goals specified, and therefore believes the environmental analysis accurately reflects the impacts of the alternatives.

Comments

Response to Comments

TWS-19

The description on p. 211 of the *Revised Draft EIS* inaccurately characterizes the methodology by which the environmental analysis was conducted. Please see TWS-9 above for a more accurate depiction. Impacts of plan actions are not assessed in comparison to the no-action or any other alternatives. Impacts are simply described and their magnitude assessed, along with the cumulative impacts of the plan actions and all past, present, or reasonably foreseeable future actions that are outside the scope of the plan.

TWS-20

Because there is no statute or regulation that defines the term “traditional activities” in the park additions and preserve, it is unclear whether snowmachining for recreational purposes is legal under 43 CFR § 36.11(c). While that uncertainty remains, the National Park Service has no mechanism for enforcing other regulatory prohibitions on snowmachine access. Please see also the discussion under PFP-5.

Identified in the NPS 1995 *Report on Effects of Aircraft Overflights on the National Park System* as important tools to minimize adverse impacts, the following actions should be included in the operating agreements:

- Flight-free zones and flight corridors
- Minimum altitude restrictions over wildlife, visitors (climbers and hikers) and communities
- Natural sound should prevail in the park for the majority of the time
- Helicopters for flightseeing or recreational access should not be allowed

If the FAA can not develop regulations to minimize the adverse impacts of overflights then the Park Service and the public must turn to Congress to ask for Alaska to be included in the National Park Overflight Act.

D. Airplane Landings in New Park

Denali National Park's backcountry zoning and mass transit system serve as role models for the country. These affirmative management tools have enabled the Park Service to achieve desired future conditions while allowing visitor access and enjoyment. Carrying capacities must also be applied to airplane landings in the New Park.

- Mandatory registration should be required for general aviation landings
- Scenic flightseeing trips and glacier landings numbers should be capped.
- Alternative 3 map best reflects the appropriate level of scenic air tour landings
- Scenic air tour glacier landings should not be allowed in Eldridge, Little Switzerland or Ramparts
- Helicopter landings should continue to be prohibited

VI. IMPACTS ANALYSIS IS FLAWED AND INADEQUATE UNDER NEPA

The methodology for determining the environmental consequences for the proposed actions is detailed in the RDEIS on p.211. The impacts are assessed in relation to the baseline conditions existing before any actions are taken under the backcountry plan; in this case, pre-existing conditions are those described in the no action alternative. The baseline conditions described in the no action alternative are misleading and can not serve as the foundation for an adequate NEPA analysis. If the Park Service continues to insist that the agency simply could not monitor and enforce legal levels of use in the no action alternative as a foundation for it's impact analysis then that simply further demonstrates the problems with RDEIS' proposed management regime that is solely dependent on an undefined monitoring program. Failure to manage is not the foundation of an impacts analysis.

In addition, the Park Service arbitrarily applies impact levels and non impairment findings. There is often no direct correlation between the cited research and the associated impact findings. There is often inadequate information and as a result subjective impact findings. There are even direct contradictions within the same impact analysis on particular resources. We urge the Park Service to complete a new analysis in the FEIS. When an adequate impacts analysis is completed, we feel confident that the Park Service will find the preferred alternative causes unnecessary impairment to park resources and subsequently choose a new preferred alternative.

A. Current Illegal Snowmobile Use is Not a Valid Baseline Condition from Which to Measure Consequences

“Recreational snowmachine use is now widespread in the southern park additions and growing rapidly (RDEIS p. 6).”

Recreational snowmobile use is not legal in Denali National Park and Preserve. The regulation, 36 CFR 2.18(c) generally prohibits snowmobiles in national parks except when “their use is consistent with the park's natural, cultural, scenic and aesthetic values, safety considerations, park management objectives, and will not disturb wildlife or damage park resources.” In the event a national park does promulgate a rule to allow recreational snowmobiles, 36 CFR 2.18 (c) limits snowmobiles to designated routes or waterways. 36 CFR 2.18(c) applies to all units of the National Park Service and closes all areas to snowmobile use

19

20

Comments

unless specifically opened by regulation. There has never been a rule promulgated to open Denali National Park to recreational snowmobiles much less dispersed snowmobile use under this authority. The designated Wilderness of Denali has been free of snowmobiles since it was established in 1917 and the NPS June 2000 regulation (65 FR 37863) solidified this long-standing prohibition. Winter access to the New Park for snowmobiles is only allowed for subsistence and traditional activities. Until NPS promulgates a rule to define traditional activities for the New Park or promulgates a rule under 36 CFR 2.18, recreational snowmobile use is not legal in Denali.

The no action alternative should reflect the 1986 *General Management Plan* direction whereby the Park Service has an affirmative management responsibility to prohibit non-traditional recreational snowmobile use in the New Park. References in the RDEIS consistently misrepresent the existing management direction and therefore application of impact levels and subsequent impairment findings is fundamentally flawed. For example:

21

- The RDEIS asserts opening all 4 million acres of the New Park to snowmobiling in the preferred alternative will provide a benefit to wilderness by lowering the impact level. How can increasing access for snowmobiling only cause negligible impacts to wilderness but in comparison causes major adverse impacts to wilderness in the no action alternative where recreational snowmobile use is not even allowed (RDEIS p.322)? Even if NPS were to argue the existing snowmobile access in the no action alternative is legal certainly the impact level assessment should be similar in the NPS preferred where the agency allows both dispersed use and concentrated corridor use.

22

- Similarly, the RDEIS measures soundscape impacts against the existing conditions in the no action alternative. This is contrary to Director Order #41 under which soundscape impacts must be measured against natural ambient sounds- not sounds generated by illegal recreational snowmobile use. The RDEIS claims there will be benefits in the preferred alternative to the natural soundscape even though the preferred alternative allows recreational snowmobile in all 4 million acres of the New Park. How can the park Service claim there are major adverse impacts to the natural soundscape (RDEIS p.286) in the no action alternative but only negligible impacts in the preferred alternative where there is a larger amount of motorized use being allowed? Again even if NPS were to argue the existing snowmobile access in the no action alternative is legal certainly the impact level assessment should be similar and not prejudiced by NPS desired outcome.

23

B. Arbitrary application of impacts levels and impairment findings

Throughout the Environmental Consequences section NPS cites existing research that documents significant impacts to resource values fundamental to the purposes of the Park’s enabling legislation and the Wilderness Act. Yet NPS consistently dismisses the same science when determining impact levels and impairment findings. For example:

- Studies indicate that exposure of wildlife to snowmobile use can result in behavioral alteration, habitat avoidance and increased energy expenditures at a time when the animals are under extreme stress. The survival of individual animals depends on the severity of energy expenditures (RDEIS p.275). Yet in the preferred alternative where all 4 million acres of the New Park are open to snowmobile use, NPS determines overall impacts to wildlife will be minor to moderate (RDEIS p.274). The adverse impacts to wildlife are not moderate or temporary when increased energy expenditures decrease chances of survival.
- Studies indicate that one mere passing of a snowmobile can permanently damage to vegetation 78% of the time (RDEIS p.232). NPS further cites visual assessments of adverse impacts to vegetation already occurring in Denali including broken shrubs, stripped bark and trail development. How does the preferred alternative allowing snowmobile use in 4 of the 6 million acres of the park only constitute moderate impact level to only 11% of the Park?

Even when the RDEIS does allow impacts to reach the highest impact level (major) in the preferred alternative the action, the Park Service fails to find impairment to the resources that fulfill the purposes identified in the enabling legislation of the Park. These direct, indirect, and cumulative impacts are affecting the very resources and values for which the Park was established. For example:

Response to Comments

TWS-21

The preferred alternative of the *Revised Draft EIS* and the modified preferred alternative of the *Final EIS* do not include a change that would open the park additions and preserve to recreational snowmachining. Snowmachine use for undefined traditional activities would continue as in the no-action alternative. However, the modified preferred alternative does contain provisions that would keep impacts to natural sound, vegetation, and wilderness resource values from snowmachine use for traditional or subsistence activities (or any other access mode) to acceptable levels. Defining those limits and creating a management plan for addressing resource harm are the reason that the preferred alternative had many fewer impacts than the no-action alternative, in which no such management plan is in place.

TWS-22

The impact analysis of the *Revised Draft EIS* does not measure soundscape impacts against “existing conditions in the no action alternative.” It identifies impacts of the actions in each alternative, and the cumulative effects. The adverse impacts are much greater in the no-action alternative for the reasons cited above in TWS-21. See also TWS-9.

TWS-23

The adverse impacts associated with snowmachine use in the park are of great concern to the National Park Service, as documented in the *Revised Draft EIS* and *Final EIS*. However, the environmental analysis appropriately uses the research information available to reach conclusions about the likely impacts. Although snowmachines could be used for traditional activities throughout the park additions, they are not likely to be used everywhere. For example, a significant portion of the acreage is composed of inaccessible glaciers and mountains. In non-glaciated areas there are many places that snowmachines are unlikely to access, and even fewer where they are likely to be used intensively (such as the Tokositna valley and the Dunkle Hills/Broad Pass area). Management area standards for trail disturbance and wildlife would provide a mechanism for taking management action in these areas if thresholds are approached or exceeded, further minimizing potential impacts. The assumptions for analysis of the preferred alternative in the *Revised Draft EIS* and the modified preferred alternative in the *Final EIS* do not include high levels of snowmachine use throughout the park and preserve, nor unmanaged use where substantial snowmachine use does occur, so adverse impacts should be within the range indicated.

Comments

24

- In the enabling legislation of the Park, Congress identified habitat for fish and wildlife as a purpose for the establishment of Denali. The preferred alternative is found to cause major cumulative impacts to vegetation and wetlands, which constitute the most productive fish and wildlife habitat in the Park, yet it is not found to cause impairment to park resources that fulfill specific purposes identified in the enabling legislation (RDEIS p.95).
- Wilderness resource values are also identified in the Park's enabling legislation as purposes for its establishment. The RDEIS allows major adverse cumulative impacts to wilderness resources and values that will preclude future wilderness designation yet the RDEIS does not find this to impair the wilderness purposes of Denali (RDEIS p. 95).
- The preferred alternative is found to cause major cumulative impacts to subsistence but no impairment (RDEIS p.95).

There are often inconsistencies in the impact analysis. The Park Service regularly asserts there are only minor or moderate impacts to a particular resource value but a few sentences later also acknowledges major cumulative impacts to the same resource value. This is true in the case of vegetation, subsistence, wilderness and soundscape resource values. The Park Service acknowledges the major cumulative impacts will have "serious ramifications on the visitor experience and condition of the park", yet the agency still argues the preferred alternative will not cause impairment because the agency will add new staff to help manage the resource (RDEIS p. 412).

NPS application of impact levels is arbitrary and capricious. It is unclear how the Park Service has come to the conclusion that major cumulative impacts to these resources and values do not constitute impairment to the purposes and values for which the Park was established. The Park Service can not abdicate it's legal responsibilities in this plan simply because the agency has failed to manage the current situation. At a minimum there must be a detailed monitoring, enforcement and funding plan in place before the Park Service can predetermine the agency's ability to manage the preferred alternative for environmental consequences.

C. EPA Finds NPS Impact Analysis Inadequate

The United States Environmental Protection Agency states in the RDEIS on p.472

We have focused our review on the potential impact of snowmobile use on the environment at Denali National Park because we believe that snow machine use, among all proposed uses under the Backcountry Management Plan, has the greatest potential to cause significant environmental impacts . . .

EPA further admonished the Park Service for the generality of their discussion of snowmachine impacts and suggested that the Park Service

does not tie these impacts to locations of concern in the Park additions where the most valuable or sensitive resources might be. Thus, the impacts remain largely undefined. The uncertainty raises concerns because this EIS will, for the first time at Denali National Park, result in the establishment of guidelines permitting widespread snowmobile use without a full understanding of the risk to environmental resources within the Park Addition

We concur with the EPA, whose comments have not been addressed in the RDEIS. The impacts of snowmobiles are significant but are not discussed except generally and there is incomplete or unavailable information. This violates 40 CFR 1502.16, and 40 CFR 1502.22. The agency is required to assess the specific impacts of snowmobiling, or if unable because it is impossible to obtain this information or it costs too much, explain that the information is lacking, its relevance to the analysis, and a summary of existing relevant information. The Park Service must examine both the park wide and site specific impacts of

Response to Comments

TWS-24

The application of impact levels is not arbitrary. The levels are spelled out clearly at the end of the General Methodology section of Chapter 4: Environmental Consequences. Although major adverse impacts to park resources are not desirable, they are allowable under NPS Management Policies as long as impairment of those resources does not occur. The definition of impairment is also clearly specified and is distinct from the definition of "major" impacts. While it is a valid criticism of the preferred alternative that it insufficiently remedies the major adverse cumulative impacts to some park resources that have already occurred, the agency is nonetheless acting within its legal responsibilities. The actions in the modified preferred alternative would not generally add substantially to adverse impacts already sustained; instead, the modified preferred alternative would largely prevent park resources from becoming impaired in the face of rising visitor use of the backcountry. See also TWS-9 and NPCA-23.

TWS-25

See PTP-6.

snowmobile. These will confirm what should realistically be the Park Service's default assumption that snowmobiles are impairing a variety of Park and Preserve resources.

VII. WILDERNESS SUITABLE LANDS IN THE NEW PARK

The National Park Service must manage all backcountry areas of the national park to protect wilderness character, consistent with the direction of NPS Management Policies (section 6.3.1), that includes categories of suitable, study, proposed, recommended, and designated wilderness within the scope of its wilderness resource management policy (NPS 2001). Wilderness character includes the natural and scenic condition of the land, natural numbers and interactions of wildlife and the integrity of ecological processes. At its core, wilderness character is more than a physical condition. ANILCA section 101 specifically identifies "preserve wilderness resource values" as a fundamental purpose of the Act.

A. NPS Fails to Fulfill Statutory and Regulatory Mandates for Suitable Wilderness

NPS has long acknowledged and admitted its abysmal failure to comply with statutory and regulatory mandates with respect to wilderness. The Alaska Region is no exception. A 1993 NPS Wilderness Task Force made the stunning admissions that the NPS response to field advisory recommendations for wilderness suitability has been "ineffective at best and past agency leadership has not met its responsibilities in wilderness management." Following these stark observations, in August 2000 the NPS Acting Associate Director of Park Operations and Education distributed an internal NPS study detailing park-by-park a litany of NPS' continued legal violations with regard to wilderness. The report cites NPS' failure to act on the wilderness qualified lands in Alaska Parks as a major deficiency and directs the Regional Director to complete inventories and formulate recommendations to submit to the Secretary of the Interior and the President.

Two years later, a 2002 NPS guidance memorandum acknowledged the scope of NPS' continued disregard of its wilderness responsibilities: "[I]t has become increasingly apparent that knowledge and details of the wilderness review process have been lost since few of these reviews have been conducted by the National Park Service over the past two decades." The same memorandum admitted NPS' obligation: "Because of past lapses, expansion of the National Park System, and changed circumstances, wilderness review is an on-going affirmative NPS obligation."

Denali National Park & Preserve is in fact a wilderness park and its purposes under the Alaska National Interest Lands Conservation Act (ANILCA) of 1980 are to preserve those wilderness values (RDEIS p.53 and p.438). In 1988, as required by ANILCA section 1317 (a), the National Park Service conducted a wilderness suitability review of the 4 million acre New Park. The final environmental impact statement concluded that approximately 3.73 of the 4 million additional acres were suitable for wilderness designation. At that time NPS forwarded a wilderness recommendation of 2.25 million acres to the Secretary of the Interior but the Secretary did not send it to the President as required by ANILCA. There has been no formal action since continuing NPS' failure to comply with statutory and regulatory mandates with respect to wilderness.

B. RDEIS Dismisses Responsibility to Complete Wilderness Recommendation

The RDEIS identifies the purpose of the BCMP as the place to address issues for which the guidance in the 1986 *General Management Plan* is out of date (DBCMP at p.21). The DEIS acknowledges that the wilderness suitability review included in the 1986 GMP is now out of date since a new suitability study would likely result in additional acreage identified as suitable in the Kantishna Hills (RDEIS at p.26).

Yet despite this admission and a clear legal mandate, NPS refuses to address wilderness suitability in the preferred alternative "because of the complexity of the process and the fact that wilderness designation requires congressional action" (RDEIS at p.26). The NPS process for reviewing and recommending wilderness is clearly outlined and within the purview of the National Park Service and Department of the Interior. Only actual designation requires congressional action. In addition, the RDEIS provides no explanation as to when it will fulfill its obligations to complete the assessment and recommendation process. NPS must take immediate and effective action to bring the National Park System into compliance with its wilderness assessment, recommendation, and planning mandates. APA, 5 U.S.C. § 706. NPS must

Comments

complete the unfinished business of ANILCA section 1317 to effectively complete the backcountry planning process.

C. NPS Fails To Preserve Wilderness Character: Snowmobiles Impair Wilderness Values
NPS must manage inventoried wilderness according to the Wilderness Act, the National Park Service Organic Act, ANILCA, Executive Orders, Mount McKinley National Park enabling legislation and National Park Service policies. NPS can take no action to either diminish the wilderness suitability of the area or reduce the probability of a wilderness designation until the legislative process by Congress has been completed. While we are pleased NPS acknowledges the agency's responsibility to preserve the wilderness character of the 3.73 million acres of suitable wilderness, we believe science and public opinion support our conclusion that the preferred alternative impairs wilderness values and therefore violate NPS law and policy.

In the preferred alternative, NPS claims the proposed actions will not lead to impairment of the park's wilderness character because the limits embodied in the expressed, desired conditions for management areas will still meet the intent of ANILCA and the Wilderness Act. Yet the Park Service recognizes the intangible values of wilderness and the agency's responsibility to forego actions that would detract from the idea of wilderness as a place where human convenience and expediency do not dominate. The preferred alternative allows snowmobile use in 100% of the New Park. This level of motorized use does not meet the intent of the Wilderness Act.

The Wilderness Act applies stringent standards. Wilderness "shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, [and] the preservation of their wilderness character." 16 U.S.C. § 1131(a). The Wilderness Act prohibits specific human imprints in wilderness lands, including motorized vehicles, roads, structures, and commercial enterprise. 16 U.S.C. § 1133(c). The natural, scenic condition of the land, natural numbers and interactions of wildlife, integrity of ecological processes and opportunities for solitude are all essential characteristics of wilderness. At its core, wilderness character, like personal character, is much more than a physical condition.

Furthermore, the RDEIS acknowledges that the values of the lands determined suitable for wilderness designation in the New Park are the same as the values in the Old Park. The NPS, "Statement of Finding, Permanent Closure," June 2000 found that snowmobile use would result in several impacts to Wilderness resource values.

VIII. CONCLUSION

The future of Denali National Park and Preserve is at a crossroads. The choice before the Park Service is simple: to uphold protections of Denali from the adverse impacts of motorized recreation or to allow degradation of this national treasure. The ultimate choice will have a profound and far-reaching impact on all of Alaska's national parks.

Again, we appreciate the opportunity to provide input. We look forward to working with you throughout the process, and look forward to completion and implementation of a Denali Backcountry Plan that will protect and enhance the values of this great national park for present and future generations.

Sincerely,

Eleanor Huffines
Alaska Regional Director
The Wilderness Society

Charles Clusen
Director Alaska Projects
Natural Resource Defense Council

Eric Uhde
Public Lands Advocate
Alaska Center for the Environment

Paul Foreman
Chair
Alaska Chapter of the Sierra Club

TWS-26

Response to Comments

The park additions are not designated wilderness under the Wilderness Act. However, as has been noted in the Wilderness section of Chapter 3: Affected Environment and other responses in this chapter, the preservation of wilderness resource values and related recreational opportunities is fundamental to the management of the Denali backcountry. Congress intended to allow some motorized use within the ANILCA conservation system units, even within some areas designated as wilderness. The BCMP for Denali defines the maximum amount of impacts acceptable from such motorized use by establishing standards for various indicators that represent facets of wilderness character, among other park resource values. The National Park Service believes that the modified preferred alternative appropriately defines these standards given the various statutory mandates applicable to the Denali additions, including the Wilderness Act and ANILCA.

Comments

505

Denali National Park
Talkeetna Ranger Station
July 15, 2005

RECEIVED

JUL 15 2005

JUL 15 2005

Mr. Paul Anderson
Superintendent
Denali National Park and Preserve
P.O. box 9
Denali Park, AK 99755

Denali National Park
Talkeetna Ranger Station

RECEIVED

RE: Comments on Draft Backcountry Management Plan

Dear Mr. Anderson:

The undersigned members of the Talkeetna air tour industry appreciate the opportunity to comment on the National Park Service's ("NPS") April 2005 Denali National Park and Preserve Revised Draft Backcountry Management Plan General Plan Amendment Environmental Impact Statement ("Draft Plan"). We represent a group of members in our industry who are dedicated to maintaining the environmental integrity of Park, enhancing the quality of visitor experiences, and ensuring visitor safety.

While we commend the NPS's planning efforts, we do not support any of the action alternatives outlined in the Draft Plan. We are deeply concerned that the proposals illegally elevate and promote the interests of a distinct user group (those seeking "natural soundscapes") over the interests of the large majority of park visitors. Because the Draft Plan is contrary to law and sound public policy, we strongly encourage the NPS to prepare a new plan that is consistent with applicable law rather than merely the subjective interests of a distinct user group, and one that will result in actual improvements in the environmental integrity of the Park, visitor safety, and the quality of all visitors' experiences.

Airplane Access

One of the primary reasons NPS developed the Draft Plan was to address issues associated with future growth in the Park. However, NPS has neither established what, if any, adverse impacts could occur as a result of airplane access nor the actual level of use that would trigger the necessity for use restrictions. Therefore, to the extent a final backcountry management plan would impose any use or access restrictions or limitations, we strongly encourage NPS not to implement such restrictions or limitations unless and until significant increases in visitor use is documented and proven necessary to comply with applicable law.

Because NPS has provided no problem with respect to airplane access and landings, we generally oppose each of the action alternatives in the Draft Plan. We feel these proposals are not based on actual use, resource conditions, visitor preferences, or any other legal or factual basis. Rather, these proposals appear to center around NPS's intent to manage the entire Park (Old Park, Additions, and Preserve) as a designated Wilderness Area, although only the Old Park has been designated as such. Moreover,

AT-1

Response to Comments

The BCMP establishes the adverse impacts from unmanaged increases in airplane noise in Chapter 4: Environmental Consequences in the Natural Soundscapes, Wilderness Resources, and Recreational Opportunity sections. User conflict issues arising because of aircraft impacts on park visitors on the ground were documented in the 2000 survey of overnight backcountry visitors (RDBCMP p.168-169, Swanson et al. 2002), the extensive public scoping process for the plan, comment letters on the original draft plan, and visitor comments received over many years outside of the planning process.

The adaptive management approach employed in the modified preferred alternative would not depend on a level of use to trigger access restrictions, but a level of noise or other impacts. The level of use could continue to increase indefinitely as long as the resource and social standards expressed in the plan are achieved.

Comments

2

ANILCA specifically prohibits NPS from managing Park Additions as Wilderness until Congress specifically designates them as part of the Wilderness System. § 1317. As operators of air tour services that have been providing quality visitor services and safe access into the Park for thousands of visitors each year, we strongly urge the NPS to reconsider its fundamental management objectives proposed in the Draft Plan and develop a new plan that is consistent with the Park's purposes and achieves an appropriate balance between preserving the wilderness character of the Old Park without eliminating the only means of access to most areas of the Park Additions.

More specifically, we strongly object to the designation of a limited number of "Major Landing Areas" and "Portals", as well as the distinction made between the two. Historically, air taxis and scenic air tours have flown visitors into the Park landing on various areas of glaciers throughout the Park Additions known for their scenic attraction or quality climbing opportunities. Landing was not restricted based upon the activity in which visitors intended to participate once in the Park. However, the Draft Plan ignores historical use and limits scenic air tours landings to "major landing areas", which include the Kahiltina Base Camp, southwest fork Kahiltina Glacier, and Ruth Amphitheater, and air taxi landings to "portals", which include areas on the Pika Glacier, Coffee Glacier, Buckskin Glacier, Eldridge Glacier, and upper Tokositma Glacier. NPS provides no legal or factual basis for imposing these landing restrictions.

3

Section 1110(a) of ANILCA guarantees the use of motorized vehicles, including airplanes, to access conservation system units for "traditional activities." § 1110(a) Special access is subject to "reasonable regulations by the Secretary to protect the natural and other values of the conservation system units . . . and shall not be prohibited unless, after notice and hearing . . . the Secretary finds that such use would be detrimental to the resource values of the unit or area." § 1110(a). The Draft Plan provides no data or indications that regulations imposing airplane access restrictions are necessary to protect the Park resources. Rather, NPS merely suggests that restrictions are necessary because the sound from airplanes interferes with some users' aesthetic values such as opportunity for "solitude" and to hear "natural soundscapes." These purely aesthetic conditions, however, are not protected resources and should not be given preference over NPS's fundamental duty to provide opportunities for public use and enjoyment (Organic Act) or restrict access under § 1110(a) of ANILCA. Further, we are concerned that NPS's proposal to monitor the Park's soundscape following the implementation of the backcountry plan could lead to regulation and limitation of flight routes in addition to landing areas.

4

Moreover, there is no rational basis for regulating the majority of Park areas to achieve "natural soundscapes" when these areas are only accessible by airplane. In fact, NPS recognizes that "[a]irplanes provide the principal means of access to most of the

¹ "Traditional activities" have generally been understood to include fishing, hunting, sightseeing, camping, picnicking, flying, photography, etc. These traditional activities have occurred in the Park prior to ANILCA and have continued since ANILCA's enactment in 1980.

2

Response to Comments

AT-2

See SoA-1.

AT-3

ANILCA Section 1110(a) provides for special access to conservation system units for traditional activities and travel to and from villages and homesites. The authorization of air taxi and scenic air tour landings in the park and preserve is a consideration of commercial services in the park, which are governed by the National Park Service Concessions Management Improvement Act of 1998 (Pub. L. 105-391). The standards for regulation and management are very different between the two. The Concessions act requires that the National Park Service determine that commercial services "are necessary and appropriate for visitor use" and "are consistent to the highest practicable degree with the preservation and conservation of the resources and values of the unit." The criteria for making these determinations are further defined in the general Commercial Services section of chapter 2 in the *Revised Draft* and *Final EIS*.

AT-4

The NPS disagrees that "there is no rational basis for regulating the majority of Park areas to achieve 'natural soundscapes' when these areas are only accessible by airplane." The BCMP clearly articulates the resources and values relevant to the park backcountry, including wilderness resource values and natural soundscapes, all of which are supported by law and policy. We agree that some level of disturbance to these resources is necessary and acceptable to provide for access and visitor enjoyment of the park. However, at some point the impact rises to the level of resource impairment, much in the same way that too many cross-country hikers damage vegetation so that the visitor activity must be managed. The proposals put forth in the plan would prevent impairment and allow for a reasonable amount of visitor access while tolerating a certain amount of resource degradation.

Comments

park and preserve. The more remote southern side and much of the northern and western portions of the Additions can only be reached by air or long, difficult overland travel.” Thus, if airplane access were eliminated, there would be no one on the ground to enjoy the “solitude.” Without any actual or real risk of resource impairment, there simply is no basis to limit airplane landings.

5 Additionally, limiting the landing areas and/or the number of landings at each area, particularly as proposed in Alternative 2, could compromise visitor safety and the quality of visitor experiences. While we do not object to NPS’s efforts to monitor landings, we strongly disagree with these numbers being used to determine future allocations. As you know, glacial conditions in the Park are dynamic. Climate and other natural forces constantly work to alter the landscape and conditions within the Park. That being the case, glacier conditions constantly must be monitored to ensure it will provide a safe landing area. Moreover, should natural conditions prevent any of the very few landing areas to become unfit for landing, operators have no option to land on a different area of designated glaciers, rather all traffic will be diverted to the few remaining landing areas located in other areas of the Park. This could result in overcrowding and overall decrease in the quality of visitor experience. Any management plan should provide for such contingencies and ensure an appropriate number of landing areas.

6 We also oppose limiting the number of landings because to do so would reduce our overall revenue and result in increased costs to passengers, which could make air access unaffordable for many visitors seeking to flightsee or climb. Accordingly, we encourage NPS to consider more dispersed use by allowing additional landing areas, which not only would provide visitors with a wider range of viewing opportunities, but would allow for the changing glacial and weather conditions, avoid any risk of overuse on any particular landing area, and improve the quality of visitor experiences.

7 We also disagree with the Draft Plan to the extent it imposes landing restrictions solely on commercial use. In our view, this unfairly discriminates against commercial users, while placing zero limitations or regulations upon private users. NPS should manage the Park on a fair and consistent basis. Moreover, Section 1110(a)’s guarantee of access makes no distinction between commercial and non-commercial access.

We generally support the Draft Plan’s proposal to create an Aircraft Overflights Working Group to develop voluntary measures for achieving desired future resource conditions at Denali. However, we recommend that the NPS limit group members to NPS representatives, commercial airplane operators, and other non-commercial and military operators, as appropriate, as well as a responsible representative of Park users seeking to obtain areas of “solitude” and “natural quiet” within the Park.

Comments on Alternatives 2 and 3

While we generally do not support any of the action alternatives, we find Alternatives 2 and 3 especially problematic. These alternatives essentially eliminate most reasonable and desired access to the Park and either limit access to the few visitors who

Response to Comments

AT-5

The modified preferred alternative provides a variety of potential landing areas for air taxis and scenic air tours. In fact, only two scenic air tour landings have ever been reported outside of the areas that would continue to be open for such landings. Weather or other natural causes may always make some or all landing areas unavailable for landing, and as a result, the National Park Service has never been able to guarantee concessioners that any particular landing area would be available when passengers have booked a flight. The National Park Service shares concerns about the effects on visitor experience and safety from overcrowding at landing areas, and the management area standards are intended to define an acceptable carrying capacity for all backcountry areas of the park, including glacier landings areas. Application of the access management tools in Table 2-11 – if conditions approach the standards – should prevent overcrowding. The National Park Service believes the plan provides an appropriate, although limited, opportunity for glacier landings.

AT-6

In the modified preferred alternative, the National Park Service does not seek to impose any immediate limits on the number of scenic air tour landings and expects at least as many scenic air tour passengers landing on the glaciers after plan implementation as at present. Since business is presently growing it appears that affordability is not an issue at current levels of service. The National Park Service agrees about the risk of overuse and the need for quality visitor experiences, and believes there are limits to the number of landings that should occur at the Ruth or Kahiltna Glaciers for reasons of safety, visitor experience, and resource protection. These limits are defined by way of the desired future resource and social conditions. The National Park Service is also obligated to provide quality experiences for other user groups, and scenic air tour traffic at large volume has detrimental effects both for park resource values and on the quality of experience of many mountaineering and climbing visitors.

AT-7

Commercial use is governed by different parameters than private use in national parks. Commercial uses must be specifically identified as “necessary and appropriate” under concessions management law and meet other criteria in the 1998 National Park Service Concessions Management Improvement Act.

Comments

are capable of self-reliant travel, or restrict visitors requiring services to access the Park to only those areas located along the Park road. As you know, most of the Park is accessible only by airplane. Accordingly, limiting access by air violates the fundamental use and enjoyment mandate provided under the NPS Organic Act, as well as the special access guarantee provided under Section 1110(a) of the Alaska National Interest Land Conservation Act.

8 Specifically, NPS simply cannot eviscerate ANILCA's well-established access guarantee by unilaterally narrowing the definition of "traditional activities" to exclude recreational use, which will all but officially close most of the Park to visitor use and enjoyment. Clearly, such actions are contrary to the letter and spirit of ANILCA § 1110(a). For similar reasons, NPS also should not seek legislation to exempt the Old Park from the critical access guarantee provided under § 1110(a).

Even the extremely limited air access allowed under these two alternatives is bogged down in additional restrictions, which further eliminate access to many user groups. For instance, each alternative would limit airplane landings in the Old Park to McKinley and Kantishna airstrips. Moreover, landings in the Park Additions could occur only if the airplane is dropping off or picking up passengers staying in the Park overnight (in other words, climbers). Since most visitors do not stay overnight in the Park, such landing restrictions arbitrarily eliminate these visitors' ability to enjoy the Park from the ground. Such unreasonable discrimination among user groups is simply not warranted and does nothing to protect the Park's resources. In fact, by not allowing the majority of visitors to land in the Park and spend time enjoying the natural wonders from the ground, NPS effectively will increase the amount of air traffic since the time that would have been spent on the ground, will instead be spent flying over these areas.

In sum, Alternatives 2 and 3 appear to be an overt attempt to close the Park to the majority of visitors and manage the Park according to the desired subjective and "social" conditions of a small contingent of Park visitors. We strongly oppose this management approach and encourage NPS to not consider either Alternative 2 or 3 as a viable management alternative.

Comments on Alternative 4 - Preferred Alternative

9 Although Alternative 4 seemingly provides more airplane access than Alternatives 2 and 3, it remains an unreasonable management alternative. First, while we generally support expanding (as compared to Alternatives 2 and 3) the areas accessible by airplane to include the Tokositna and Kahitna Glaciers and the Dunkle Hill/Broad Pass area, it arbitrarily would prohibit scenic air tour landings on the Pika² and Eldridge Glaciers "when climbers are present, with contract provisions to achieve desired future resource conditions." Historically, both climbers and tourists have used the Pika and

² Map 2-6 mistakenly locates Pika Glacier as the area between Mount Church and Tokositna Glacier; however, Pika Glacier actually is located to the east of the Kahitna Glacier and west of the Tokositna Glacier.

Response to Comments

AT-8

Alternatives 2 and 3 were not selected as the National Park Service preferred alternative in the *Revised Draft* or *Final EIS*. In those alternatives, the actions related to access for traditional activities were requested by the vast majority of comments on the original *Draft EIS* and therefore needed to be considered within the NEPA process. The specific proposals were not contrary to law, but either acknowledged that new law would be required for implementation or proposed an interpretation of law and regulation that is reasonable. The effect of these actions on visitor use and enjoyment was considered in Chapter 4: Environmental Consequences in the section on Recreational Opportunity and Visitor Safety.

AT-9

The preferred alternative has been modified to remove the prohibition against landing when climbers are present on the Pika and Eldridge Glaciers. However, the *Revised Draft EIS* provided several reasons why such a partial separation of user groups would be desirable and within NPS authority. ANILCA 202(3)(a) indicates that providing opportunities and access for "mountain climbing, mountaineering, and other wilderness recreational activities" is a fundamental purpose of the Denali additions. Comments by climbing organizations such as the American Alpine Club and experienced mountaineers during scoping, workshops, and comments on both the original and revised draft BCMPs indicate that scenic air tours can and do interfere with climbing and mountaineering activities. It is a responsibility of the National Park Service to protect this statutorily recognized experience, and managing commercial scenic air tour landings along with other visitor activities is essential to accomplish this.

Comments

Eldridge Glaciers. It is our experience that general demand for scenic air tours is almost six times that of climbing opportunities.³ Yet, NPS provides no basis for suddenly prohibiting landings for scenic tours simply because climbers are present. Certainly airplanes do not interfere with climbing or mountaineering activities. In fact, airplane access is the only means by which climbers and mountaineers may access these areas.

Moreover, NPS does not explain the basis for requiring contract provisions to achieve some undefined "future resource conditions." We strongly recommend that NPS clarify this vague language. At a minimum, NPS must define the future resource condition and indicate how the extent to which contract provisions may be used to achieve such conditions.

Additionally, if climbers are present on the Pika or Eldridge, most landing traffic will be funneled to the Ruth Glacier under this alternative. Rather than allow for a system of dispersed use with de minimus impacts, this alternative would concentrate landing activity to a single location, which could result in overcrowding and decrease the quality of visitor experience. Moreover, as explained above, landing conditions on glaciers are dynamic and there is no way to determine whether this spot on Ruth Glacier will continue to be an appropriate landing area in the future. Limiting landing areas also imposes unnecessary and severe financial risks on concessionaires and incidental business permit ("IBP") holders. For instance, if weather conditions do not allow us to land at Ruth Glacier, and we cannot land on Eldridge or Pika simply because climbers are present, we simply cannot provide the visitor service, resulting in a potential loss of thousands of dollars a day. We oppose this aspect of the Draft Plan and urge NPS to consider such economic consequences as part of its economic impact analysis. Accordingly, we recommend that the NPS eliminate this unnecessary prohibition and allow landings on Pika and Eldridge regardless of the presence of climbers and mountaineers.

Second, this alternative vaguely refers to managing airplane access areas to meet undefined "social conditions." We support sound management decisions based on facts and evidence supporting agency actions undertaken to protect "resources", but there simply is no legal or factual basis for managing the Park to accommodate subjective and undefined "social" conditions. See ANILCA § 1110(a).

Third, this alternative arbitrarily discriminates against certain user groups by restricting only scenic air tour landings, while imposing no restrictions on climber-related landings (overnight visitors) in the Park. From a resource perspective, this makes no sense, especially when day users generally impose less impact on resources than overnight users.

³ In 2004, air tour operators transported approximately 1709 climbers and 9,578 scenic passengers who landed in the Park.

Response to Comments

AT-10

Agencies can respond to potential resource impacts on public lands by dispersing use or by concentrating use to an area where impacts can be contained. Dispersal did not seem a viable option in the case of glacier landings because of the volume within the relatively narrow part of the Alaska Range that is readily accessible from Talkeetna. Attempts at dispersal would likely result in major impacts to natural soundscape and wilderness resource values that presently occur at the Ruth spreading to a number of other locations.

The National Park Service acknowledges that glaciers are dynamic, and the modified preferred alternative contains a provision that the locations of Major Landing Areas and Portals can be adjusted over time to respond to changing conditions.

Records from the past 20 years show rapid growth in the number of scenic landings on glaciers on the south side of Denali National Park. Because the vast majority of these scenic landings in the past have not involved the Eldridge or Pika Glaciers, the National Park Service disagrees that any provision in the preferred alternative of the *Revised Draft EIS*, especially as modified for the *Final EIS*, presents any "severe financial risks on concessioners and incidental business permit...holders."

AT-11

Resource and social conditions are defined in the Management Area sections, where indicators for both natural and social conditions are described and specific standards established. The commercial use of airplanes in national parks is governed by the National Park Service Concessions Management Improvement Act of 1998 (Pub. L. 105-39).

AT-12

The National Park Service disagrees that any provision in the plan discriminates against certain user groups. The plan establishes limits on the number of climbers and mountaineers rather than on the number of air taxi landings, but these limits would indirectly restrict the number of air taxi landings. For Mount McKinley – by far the most popular climbing destination – there would be a firm cap of 1,500 climbers per season, which is much more stringent than any of the limitations proposed for scenic air tour landings. In other locations the number of climbers and mountaineers would eventually be limited by the standards identified under Management Areas.

Comments

Comments on Alternative 5:


We find this alternative less objectionable than the other alternatives to the extent that it appears to provide more airplane access; however, we do not support this management proposal as a whole. Under this alternative, NPS would not impose the arbitrary landing restrictions on the Pika or Eldridge Glaciers. However, NPS would subject scenic air tour landings to contract provisions it considers necessary to achieve undefined future resource and "social" conditions. As explained in our comments on Alternative 4, NPS must define the desired conditions and clarify the type of contract provisions it intends to require to achieve those conditions. Moreover, there is no legal or factual basis to management: the Park to achieve any set of "social" conditions. Management decisions should be based on resource protection and public use, and enjoyment as mandated by the NPS Organic Act. NPS's ability to regulate the Park for aesthetic values is limited and certainly cannot trump its statutorily mandated duty to provide access (ANILCA § 1110(a)) or opportunities for public use and enjoyment (Organic Act).

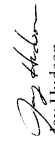
As with Alternative 4, we strongly oppose the distinctions made between air taxi landings and scenic air tour landings. Such distinction is discriminatory in nature and imposes unfair restrictions on visitors (mostly non-climbers) who seek to view the Park, but not sleep there.

Conclusion

Thank you for the opportunity to comment on this very important Draft Plan. We are hopeful that NPS will seriously consider our concerns and develop a Plan that is consistent with law, protects the Park, and affords all visitors an opportunity to experience all areas of the Park. The air tour industry stands ready to assist NPS in developing a Plan that accomplishes these significant tasks.

Sincerely,


Suzanne Rust
K2 Aviation


Jay Hudson
Hudson Air Service


Phil Roderick
Talaketna Air Taxi


Doug Greeting
Aviation


Fly Denali, Inc.

Comments



Superintendent Paul Anderson
Denali National Park & Preserve
PO Box 9
Denali National Park, AK 99755

July 14, 2005

Re: Comments on Revised Draft Backcountry Management Plan

Greetings Superintendent Anderson,

Thank you for the opportunity to comment on the Revised Draft of the Backcountry Management Plan. Alaska Wildland Adventures looks forward to our 30th year of bringing appreciative visitors to Denali National Park and Preserve. As you know, Alaska Wildland Adventures spent 10 years as partner and manager of Denali Backcountry Lodge. While we deeply miss having a presence in Kantishna, we remain committed to working to preserve the wilderness characteristic of Denali National Park and Preserve. Our trips continue to utilize Kantishna and we have strong relationships with both Kantishna Roadhouse and North Face Lodge. We also respect and appreciate the opportunity offered by the National Park Service to provide our "two cents" on the Revised Draft.

Response to Comments

Comments

Most of our guests are visitors from the Lower 48 that live in urban areas where intact eco-systems were eliminated long ago. For many, their visit to Denali National Park and Preserve is the first time they have ever experienced being surrounded by a landscape that is practically unaltered by man. For this reason, we believe that protecting Denali's natural ecology should be the number one priority of the Backcountry Management Plan.

Alaska Wildland Adventures believes strongly that Denali National Park and Preserve should be managed solely as a wilderness area that provides only non-motorized opportunities for visitors. For this reason, we prefer that the Old Park definition of "traditional activities" to be applied to the remaining Park and Preserve. Most lands surrounding Denali National Park borders provide ample access to snow machines. We do not believe that recreational snow machining fits the wilderness character of which the National Park Service strives to maintain for Denali National Park. We also do not interpret ANILCA to allow for snow machining under special access provisions and do not view recreational snow machining as a "traditional activity".

1

Alternative Four discusses the option of offering guided hiking in the entrance area, specifically the Rock Creek, Roadside, Jonesville, Nenana River, and Triple Lakes Trails. We support this idea, as it concentrates use in the front-country. We would however only continue to support this alternative if these trails were managed under the same limits as Kantishna: specifically, 10 guests and one guide per trail per day. This

Response to Comments

AWA-1

The modified preferred alternative retains the options for commercial guided hiking on selected entrance area trails that can be used for both interpretive opportunities as well as for connecting destinations (for example, Nenana Canyon and the park Visitor Center; the Visitor Center and Park Headquarters/Sled Dog Kennel). No group size limits have been determined for entrance area trails, however. The high construction design standard of these trails would allow more people in each group than would be true hiking off of developed trails in Kantishna, which is the comparison offered by the comment. Many trails, including the popular Horseshoe Lake and Mount Healy Overlook Trails, would not allow commercial guided groups and would be available for non-guided visitors. Also, the trails are in the frontcountry, not the backcountry, and the expectations should be different. Where trails do cross into the backcountry, such as the Triple Lakes trail, backcountry group size limits would apply once the trail crosses into the backcountry management area.

Comments

will keep large groups from overusing these trails and impacting the non-guided visitor experience.

2
Alternative Five addresses guided day hiking and backpacking throughout the Old Park. We do not support this alternative as written, and we specifically do not support the Park concessionaire as being the designated provider of these activities. The expertise of the concessionaire is in handling large group tourism. Guiding hikes demands an entirely different skill set. We also would like to see guided backpacking taken out of this alternative and solely allow for day-hiking. We would only support Alternative Five if guided day-hiking in the Old Park was done in conjunction with the Murie Science and Learning Center (MSLC) and under the same trail limits as enforced in the Kantishna Area. We believe that if all guided hiking in the Old Park were managed under a central entity, such as the MSLC, a higher and more consistent level of service would be provided to park visitors. It would not be necessary for the MSLC to provide all the guides, however. We can envision a process whereby companies demonstrating experience in the Park can have trained and authorized guides to lead hikes on a limited basis. Limits, fees, and standards would be maintained by the MSLC.

3
Pursuant to our comments on past and current Denali management plans, we also believe that leaders of groups with camping permits at Savage River Campground should be able to hike with their trip participants in the areas surrounding Savage River Campground as well as join their groups on hikes accessed by the VTS.

Response to Comments

AWA-2

In the modified preferred alternative, a guided day-hiking service would continue to be offered in the western portion of the Old Park with access from Kantishna. Although this service would be offered as a commercial visitor service, there is no necessity or intent that it be included in the concession contract held by the Doyon/Aramark Joint Venture. The National Park Service would choose the most appropriate of several commercial visitor service authorizations to use for this service, and in the near term, the service is likely to be offered using similar contracts to those for guided hiking presently held by the Kantishna Lodges. The Murie Science and Learning Center could also offer educational programs throughout the Old Park, and those could include partnerships with other entities.

AWA-3

Provision is made in the modified preferred alternative to allow commercial groups staying at Savage Campground group sites under an Incidental Business Permit to guide groups on the Savage Alpine Trail between Savage Campground and Savage River. This opportunity is consistent with the interest of NPS to provide some reasonable opportunities in the frontcountry that would allow commercial groups to hike with their guides and that would also encourage walking between destinations. Because this trail would primarily be in the designated wilderness area, group size restrictions would apply. Because this trail is almost entirely on tundra and the presence of large numbers of groups would have a much higher impact than in forested areas, the National Park Service does not intend to open this trail to commercial groups other than those staying overnight at the Savage Campground. Opportunities for guided hikes elsewhere in the Old Park would have to be arranged through the Murie Science and Learning Center or a concessioner that has a permit for guided hiking.

Comments

While we totally support the maintenance of a “no formal trails” policy, we do support formalizing trails around the Wonder Lake area for those campers who stay at the Wonder Lake Campground as well as a trail from Eielson Visitor Center to Gorge Creek. Trails in these areas exist informally, and designating trails to concentrate use will help to minimize damage to the vegetation. Alternative Four discusses restricting day-hiking to developed trails identified under “Backcountry Facilities”. We do not support the idea of restricting guided hiking to the developed trails as identified under “Backcountry Facilities”. For some areas, restricting guided hiking to trails may be appropriate, but for many areas we do not believe it is necessary. Restrictions should be developed on a case-by-case basis. Simply to restrict all guided hiking to developed trails is unnecessarily restrictive. And as noted above, we only support guided hiking in conjunction with the Murie Science and Learning Center.

Again, thank you for the opportunity to share our comments and concerns on the Denali Backcountry Management Plan. Good luck with your massive endeavor. If I can provide any more information, please call upon me.

Best Regards,

Kirk Hoessle, President
Alaska Wildland Adventures
PO Box 389
Girdwood, AK 99587
(907) 783-2928 or (800) 334-8730

Response to Comments

AWA-4

The provision referred to only applied in certain units of the Kantishna Hills, not parkwide. However, the provision was removed in the modified preferred alternative.

Comments

July 12, 2005

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

Steven Bergt
2607 W. 32nd Avenue
Anchorage, AK 99517-1828

Dear Superintendent Anderson:

Thank you for taking the time to read the following comments regarding the "Revised Backcountry Plan" for Denali National Park and Preserve. First, I would like to emphasize the word "Preserve". It is imperative that the most essential purpose of the Backcountry Plan is to preserve what OUR original intention of setting aside this crown jewel of wilderness intended to do. We are responsible for protecting the wilderness values of the park and to preserve the ability to experience solitude in a quiet and untrammeled environment. Yourself and those responsible for upholding the mission of preserving wilderness values surely must know that Denali National Park and Preserve is a unique and special place. It should be managed as a wilderness park with non-motorized opportunities for wilderness experiences. Again, the protection of natural ecological processes and wildlife should be the number one priority for the Backcountry Management Plan.

I have had the great privilege to be able to experience Denali National Park and Preserve since 1972. I was 12 years old when a family friend allowed me the opportunity to go with her and spend my first week in the Park. During this visit I experienced a completely new awareness of wilderness and the importance of preserving this intact ecosystem. Thirty three years later I still spend at least two weeks every summer in the park hiking and exploring it's natural beauty and wildness. I have spent my entire life in Alaska and have seen many of our wildest places become tarnished by motorized vehicles. I urge you to not allow recreational snowmachining in Denali National Park and Preserve. Recreational snowmachining is not a traditional activity under ANILCA's special access provisions. The old Park Definition of traditional activities should be applied to the remaining Park and Preserve.

It is imperative that the Backcountry Plan should stipulate that the National Park Service finalize the Wilderness recommendations and designation process. The ANILCA mandated this process, and it should be completed for the Park additions. In the meantime, the Backcountry Plan should not set indicators and standards at levels that will degrade areas suitable for Wilderness designation.

During recent visits to the Park my fellow companions and I have experienced increased air traffic noise. We have all commented on this ever increasing noise that spoils the natural sounds and solitude. A natural soundscape is a key wilderness resource. The backcountry plan should identify those areas of the Park where current noise levels exceed standards and provide specific mitigations for these problem areas. In order to protect the soundscape of the Park is important that the National Park Service limit scenic tour landings and work with aircraft operators to protect Denali's natural sounds from the incessant noise of overflights.

Having spent many days hiking the backcountry in Alaska there is no other place like Denali National Park and Preserve where an individual can experience trailless hiking. I urge the National Park Service to continue the policy of no formal trails in the backcountry. Only under

Response to Comments

Bergt-1

See PTP-5.

Bergt-2

See PTP-6.

Bergt-3

Table 4-1 in Chapter 4: Environmental Consequences provides a comparison of noise conditions to standards in places where measurements have been conducted. Although the National Park Service does not have the level of information necessary for firm conclusions about problem areas, the Access Management Tools in Table 2-11 of the modified preferred alternative would be the general methods by which the National Park Service would resolve problems in the future.

Comments

heavy use conditions should trails be constructed to avoid impairment to the natural vegetation and soils and that all trails should undergo NEPA public process.

The Backcountry Plan should change the preferred "Alternative 4" to "Alternative 2" which does the most to protect the Park resources. Specifically, "Alternative 4" which will result in the highest impairment to the Park, allows levels of use and impact associated with Management Areas designated as 'A', Corridors and Portals that will be highly incompatible with Wilderness suitability. The only reasonable alternative that supports "Preserving" the natural resources of the Park is "Alternative 2".

4

Finally, the Backcountry Plan should include stipulations that the National Park Service will strengthen the monitoring and enforcement of the elements of the plan. Data analysis should be conducted more frequently than the current five year period in order for there to be a more proactive process in protecting the Parks natural resources.

In closing, I want to thank the National Park Service for their effort in creating the draft plan. I appreciate the opportunity to be able to provide input regarding responsible management of our wild lands. I look forward to the continuing effort to protect Denali National Park and Preserve as a truly unique and wild place.

Sincerely,

Steven Bergt

Response to Comments

Bergt-4

See NPCA-5.

Comments

July 15, 2005

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

From: Barbara Brease
P.O. Box 549
Healy, AK 99743

Comments on the Revised Denali Backcountry Plan

I encourage you to support the **People for Parks** alternative as developed with the combined efforts of the Sierra Club, Denali Citizens' Council, Wilderness Society and others. The NPS Preferred alternative does not appear to give much consideration to the impacts the plan would have on wildlife, especially the northern boundary of the park. It seems risky to support any alternative that leaves the door open for unknown impacts over the next twenty years.

Motorized Access

My biggest concern with the NPS preferred alternative is that it authorizes continued and even expanded recreational snowmachining in the park additions and Preserve. I support the People for Parks Alternative to prohibit this use. Despite all the improved technology, snowmachines cause substantial harm to plants, animals, air quality and the wilderness experience of park visitors. Since recreational snowmachining is available on the surrounding public lands, as well as many areas in the state, it is reasonable to designate Denali backcountry as non-motorized as possible to protect the wilderness.

If snowmachine use is increased and expands into more locations in the park additions and preserve (under the NPS preferred alternative), potential impacts could be severe, especially in combination with the liberal hunting and trapping limits in those areas. With snowmachine access, park wolves, bears and other wildlife will be especially vulnerable.

Current bag limits in the park and preserve allow for the shooting of 10 wolves a day from Aug 30 to April 30 with a hunting license and unlimited wolf killing with a trapping license (which can also be done with shooting). Hunters and trappers will have increased access to wolf families that inhabit the park additions *as well as the old park*. Timely monitoring would be impossible since sealing records are not available until the following spring. (Killing one wolf is a severe impact). The Park and Preserve (especially the Northern boundary) are integral parts of the Park ecosystem. If anything, we need to increase protection in these areas

Snowmachine traffic could also displace many animals including denning bears and wolves. Packed trails could change movements of animals. We know human generated noise will affect the behavior of most wildlife. At this time we cannot quantify the impacts because we don't know them all. (Ex: is it ok to disturb one nesting pair of swans?). Those that want recreational access to public lands can go to the surrounding public lands.

I believe that you should apply the definition for traditional activities, to the 1980 Park Additions and Preserve in the plan. Applying this definition will prevent the authorization of recreational snowmachining in the park additions and preserve. I am sure that many will support the fact that recreational snowmachining is not a traditional activity.

Response to Comments

Brease-1

The potential for these cumulative impacts is identified in the Wildlife section of Chapter 4: Environmental Consequences for all alternatives of the *Revised Draft EIS*.

Comments

Response to Comments

- Brease-2
- In the modified preferred alternative, the hunting guide areas in the southwest preserve would be adjusted to encompass the entire area of the preserve. The existing distribution of guide areas does not follow a rational pattern that is simple for guides and clients to determine where to hunt (see Map 3-6 in the *Revised Draft EIS*). The guide areas are also too small to be viable as concessions, as evidenced by several years of no activity. The guides and professional hunting organizations have expressed desire in public comment on the original and revised draft plans for the entire southwest preserve to be available for guided hunting.
- Brease-3
- Although additional wildlife harvest would obviously result in an immediate change in an absolute numerical sense, State hunting regulations would be expected to prevent any population-level impact. The guided hunts would take place within an area where sport hunting already occurs, and might simply displace some of the impacts from the existing activity.
- Brease-4
- The modified preferred alternative calls for road plowing only when necessary to prepare the road for summer season use, and it does not include an extension of the existing Spring Trail west of its current terminus at mile 7 of the park road. As a result, no immediate action is believed necessary to protect wolf den sites in the Jenny Creek area.
- Brease-5
- Except for continuing the existing guided dog mushing and dog freighting commercial services, the modified preferred alternative has no specific provisions to encourage use of dog teams at Denali.

- 2
- Guided Sport Hunting**
The People for Parks Alternative recommend retaining the status quo regarding guided hunting. While I feel strongly that no guided sports hunting operations be conducted, I favor the status quo to the NPS preferred alternative. As a member of the Middle Nenana River Advisory Committee to the Alaska State Board of Game, I am not aware that the need to increase hunting opportunity in the Park and Preserve has been demonstrated, and certainly not something to be suggested to the Board of Game or Alaskan hunters.
- 3
- According to the EIS, wildlife populations would not be adversely affected by harvest from guided hunts. Any increase in mortality is certainly an “effect” on wildlife populations, and it seems an incorrect assumption, if the entire southwest preserve is opened for guiding. Guided hunting, in combination with increased motorized access, could have a very serious impact on wildlife populations.
- Park Road/Spring Trail**
I do not support the plowing of the park road from Park Headquarters to Mile 7, as stipulated by the NPS preferred alternative. Headquarters has always been a popular point to embark upon for wilderness opportunities in the winter. The road is wide enough for dog mushing and for skiers. March 1 is too early to start plowing the road since the road itself is a perfect route for mushers and skiers. What is the rush to clear overflow ice? That is a natural feature of the area and can be dealt with in late April.
- 4
- A spring trail to Mile 7 and a plowed road to Savage Campground may potentially impact the Margaret Wolf Family. A trail and plowing would increase access and use to a popular skiing/mushing area in the Jenny Creek drainage. The Margaret wolves use the area to den in the spring. Since den selection begins in February and March (when human winter activity is at it’s highest) dog teams and skiers should be discouraged from going up Jenny Creek in the winter and spring. If a trail is established and the park road plowed, I would encourage a closure in the Jenny Creek area.
- 5
- Encouraging dog teams to use the park requires caution. There is a possibility that this could introduce viruses (such as parvo) to the wolves. We know the park dogs are vaccinated, but vaccinations are not required of other dogs that enter the park.
- Al Lovaaas, former NPS Chief Wildlife Biologist for the Alaska Region, states in the 1989 George Wright Forum, “The first lesson of ecology is that all resources, all facets and features of an ecosystem are equivalently important and indispensable because they support one another. ANILCA mandates optimal functioning of entire ecological systems.” All of the backcountry lands are an integral part of the park’s wilderness.
- Barbara Brease

Comments

Greetings,
I am writing you in regards to the future of the wilderness values within the Backcountry of Denali National Park & Preserve.

I would like to voice my support for alternative 2 within the selection choices for the future of management policies here at Denali.

I am aware that the NPS has a preferred alternative (no. 4), that I feel does not do enough to preserve the wilderness values that Denali is recognized for on a worldwide scale. People come here from many reaches of the planet to be in a place where the footprint of man is as comparable to as natural a balance as possible. Denali is a place for people to discover a sense of exploration, and as the superintendent introduced the new film this summer..."a place to discover our own meanings of Denali". To funnel people to specific trails, have more signs of people, encountering large groups, and more people explaining the meanings of Denali certainly runs counter for that sense of personal discovery.

The people have fought time and again to retain the primitive and natural nature of Denali whether it was a road issue, a numbers issue, snowmachine issue, or now the backcountry issue. People want this park to remain different and unique. Denali has world renown for the values it preserves now. I, and many others on the planet will grieve to experience this loss of character...and what for, really. Maybe through dialogue, it is time to get the tourist industry (eco or not) to support these values as well.

I feel that none of the alternatives addresses the idea of encountering large groups within the Old Park 1 management area. Certainly within a half mile of the road corridor there will be large groups, but as one gets away from the road there should be some method explored of limiting group size to avoid encounters with large groups. This would also support the concept of no formal trails in the backcountry which many people come here to experience.

I also would like to see the definition of traditional activities (i.e. recreational snowmachining) be expanded to the Park and Preserve portions of Denali as well, to prevent the loss of our soundscape here at Denali.

When hiking near the Alaska Range even in the Old Park, one can see their watch by the flightseeing on the North side of the Range, it would be prudent to limit these numbers, as well as the size of the Portal areas on the South side of the Range. I also believe that to designate campsites out west will also increase use and demand for more activities, flights, transportation and trails in an area that currently does not need them.

Once again, I would like to express support for Alternative 2 within the choices for backcountry management.

Response to Comments

Colianni-1

The modified preferred alternative would limit some areas to a group size limit of 12 and others to a group size of 6. All of OP-1, including the backcountry areas accessible from the park road corridor, would have a group size limit of 12. This limit is a reduction in the day-hiking group size presently allowed for NPS Discovery Hikes (15 plus a ranger) and other guided activities in the Old Park. Many of these guided groups travel more than one-half mile from the park road.

Colianni-2

The backcountry campsites in the modified preferred alternative would be unlikely to generate additional demand for activities and transportation. The number of campsites would be relatively small in proportion to overall backcountry use, and the existing camper buses could be used for transportation. The sites would be very primitive, with no amenities except perhaps outhouses and food lockers. They would be located in conjunction with existing mining access routes such as the Moose Creek and Skyline trails, so new trail construction would be unnecessary to reach them. There might be new commercial services that utilize the sites, but those services could presently be authorized without this plan as a dispersed guided backpacking opportunity. This plan provides a clear direction as to where those commercial opportunities could take place.

1

2

Response to Comments

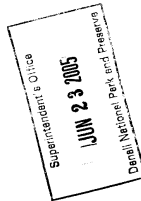
Comments

Respectfully Yours,
Ruth Colianni
P.O. Box 198
Denali Park, AK 99755

Comments



Miki & Julie Collins
ALASKAN FREELANCE WRITERS/PHOTOGRAPHERS
LAKE MINCHUMINA, ALASKA 99757



Paul Anderson, Superintendent
Denali National Park
PO Box 9
Denali Park Alaska 99755
June 20 2005

Thank-you for the opportunity to comment on your Revised Backcountry Management Plan. We were especially pleased the Park included impacts to subsistence users and resources in the revision.

Overall we still prefer Alternative 2 as the best way to preserve the Park for present and future uses, including subsistence, scientific, and true wilderness recreational activities. The Preferred Alternative, if anything, provides for more development than the Original Preferred Alternative. It is distressing to see the Preferred Alternative would cause major cumulative impacts on vegetation, minor to moderate adverse impacts on animals, areas where the soundscape would have major cumulative impacts, and moderate (foreseeably major) adverse impacts on subsistence. Alternates 1 and 5 are unacceptable due their impacts on the wilderness. If the Park resources are to "remain 'unimpaired' for...future generations" (p.13) Alternative 2 seems the best way to do this. It is discouraging to see that of the public comments you received, 93% favored the precursor of Alternative 2 (our preference) and only 1% favored the NPS preference (p.432).

Our specific concerns include:
The Muddy River draining Lake Minchumina is the single best wetland habitat in the Park. It should be protected as such and should NOT be a Corridor. While local summer traffic is sometimes significant, labeling it a Corridor invites substantial activity from outside this locality. The Executive Summary (p. 9) says a Corridor allows very high encounters with people, large groups of people, high evidence of modern use and high natural sound disturbance, all of which is painful to think about and would be difficult to deal with. In addition to concern for our subsistence activities and the solitude we value so much, this area is critical habitat for moose, bear, wolves, beaver, waterfowl, kingfishers, birds of prey and other animals that thrive here. Additionally it is a vitally important moose hunting area for local subsistence people. Labeling it a Corridor will invite outside hunters who have already badly damaged moose populations on the bigger rivers, as well as

Response to Comments

Collins-1

The modified preferred alternative revises the management area designations to show the Muddy/Kantishna River as a Corridor for the summer season only. This designation is appropriate because conditions on the river in terms of visitor presence and impact will be higher than the surrounding areas since the river is the primary transportation artery in this part of the park and preserve during the summer season. Designating the river as a Corridor does not mean that the National Park Service will encourage traffic to this location. It does mean that when the National Park Service monitors conditions along the river, a higher level of use is acceptable than in the surrounding areas. Visitors are responsible for operating boats responsibly, but the National Park Service can enforce rules more stringently if needed to address particular problems such as high speeds in areas with low forward visibility. Corridors have a "medium" standard for administrative presence, which calls for rangers to "make routine visitor contacts." Thus, it is a goal of the plan to establish a greater patrol presence on this Corridor, particularly during busy seasons.

Comments

Collins/2

tourists who will be disappointed that, despite its proximity to Denali, no views of the mountain are available due to the densely vegetated riverbanks, and wildlife sightings tend to be brief for the same reason. Due to very limited forward visibility on the river, increased traffic, especially the high-speed boats used by those traveling in from other areas, would be dangerous. Additionally, on p. 503 you confirm that this Corridor is also a winter route, an unfortunate deception as the winter ice is dangerous due to warm outflow from Lake Minchumina that melts the ice from below. Locals know to stay off this route in the winter. Due to changes in the Foraker River, we do not even know how much longer the Muddy "Corridor" will even be navigable by motorboat because of increased silting. Finally, labeling it a Corridor implies at least some Administrative presence (executive summary p. 9) but NPS probably does not have the fiscal capacity of keeping a ranger there (an important consideration during hunting season.)

We were happy to see NPS Preferred Alternative does not include commercially guided hunts in the northwest preserve. In addition to potentially impacting subsistence, the logistics of managing hunts in that area (particularly the Foraker/Herron drainage) would be severe. We also oppose scenic air tour landings in the north additions for the same reasons.

2 On p. 501 you report that the trapping season closes by the end of February, but this is not correct. Wolf, beaver, otter, and muskrat have later seasons. Also, in March and April we are restocking cabins, cutting firewood, doing general repairs and using the trails repeatedly. Current conflicts with guided tourists and the potential for conflicts with increased snowmachine traffic are concerns. The Preferred Alternative anticipates growth in snowmachine traffic which will adversely impact subsistence activities. We would like to see snowmachines restricted in sensitive areas and areas critical to subsistence. Any development in the Kantishna/Stampede area is likely to spill over and adversely affect us. We are particularly concerned about recreational snowmachine use impacting subsistence traplines as it has already done in so many other areas around the State.

3 We are concerned that the client limits on the local dog mushing concession are too high if they continue using our trapline to access the Old Park. The number is high enough to cause significant impact to subsistence resources. In the past, even with more limited clients, we have felt it necessary to put off other activities to "drag" the trail to make sure it, and the cabins, are in order for the next subsistence trapping season. While the cabins are not to be used for commercial purposes, they have occasionally been used in the past and this illicit use might increase if the size of the parties increases.

4 While some people want to see shelter cabins and tents in the Old Park, we feel it would be best to preserve the wilderness as it

Response to Comments

Collins-2

The incorrect statement was deleted in the places where it occurred.

Collins-3

Conflicts between recreational snowmachine use and subsistence use are documented in both the Subsistence Resources and Opportunities section of Chapter 4: Environmental Consequences and Appendix C: ANILCA 810(a) Summary of Evaluations and Findings. Some effects on subsistence resources and opportunities from non-subsistence snowmachine use are expected under the modified preferred alternative, but the management area designations in critical subsistence areas were selected to minimize conflicts (see SRC-2) and the National Park Service could use the access management tools in Table 2-11 to minimize the impacts.

Collins-4

The client limits are within the range allowed by management area designations. The issue raised is too specific to be addressed within the context of a general management plan document, but could be addressed separately through concessions management.

Comments

Collins/3

is, because most other recreational areas in the state are more open to such development whereas NPS has the power to preserve its wilderness untouched, if it chooses to do so.

One comment is unrelated to the Plan. On page 484 you reprint a letter from the State of Alaska, which quotes NPS reporting "no known use of airplanes by local rural subsistence users." This NPS statement is not correct. Aircraft have been used in this area by numerous historic old-timers such as Slim Carlson, Fabian Carey, Ray Tremblay, Val Blackburn, etc, as well as more recent users including John Burns, Jack Hayden, the Starrs and ourselves. Landings or airdrops for subsistence purposes have occurred on the McKinley, Slippery, Foraker and Birch Creeks; on Lonely Lake, Carlson Lake, Castle Rocks Lake, Livetrap Lake and many other locations, both winter and summer. We can help document this if NPS feels it is necessary to do so to establish a record of "customary & traditional."

In closing, we wish to acknowledge the thoughtful sympathy card you sent us last winter after our father died. It was so kind and really meant a lot to us. Thankyou, sincerely.

Good luck in working through all the conflicting advice and demands I am sure you'll receive regarding the BMP.



Julie Collins
Miki Collins

Response to Comments

Comments

F. C. Dean – dena_bc_plan_comment

1

15 July 2005
Comments on Revised Draft Backcountry Management Plan for Denali National Park and Preserve.

Frederick C. Dean
810 Ballaine Road, Fairbanks, AK 99709
Tel. (907) 479-6607

General Comments

1. My personal preference is [Alternative 3](#) > [Alternative 4](#) over the others.

Discussion – One can presently find wildland/wilderness experiences somewhat similar to those that are possible in Denali National Park and Preserve (DNPP) in other areas of the Alaska Range. However, as one goes either east or west of DNPP the situation changes considerably. The ecosystem becomes somewhat different, and certainly the assemblage of plants and animals is different. DNPP affords a nearly unique, if not actually unique, physiographic and ecological setting in combination with unusual opportunities for access. This combination can not be found elsewhere, even today. Less restrictive patterns of land use either exist currently or can be reasonably expected elsewhere throughout the Interior and in the Alaska Range. This leaves DNPP with a special responsibility, i.e. preserving the opportunity to find land in this ecosystem that is as nearly wilderness as possible, given its history and socio-political realities.

Philosophically, I would like to see conditions described under Alternative 2 continue. Realistically, I suspect that increasing pressures from all sorts of users will continue to increase as they have been doing for the past 50 years. On a long-term basis, that would make continuance of Alternative 2 conditions uncertain, a slow but steady degradation would be nearly assured.

2. The backcountry plan does not need to provide for all types of experiences for all people in all portions of the DNPP's backcountry.

Discussion - Any plan that is adopted needs to recognize that it is not "undemocratic" to provide some areas that offer wild land experience to anyone who is willing to go under their own power while simultaneously restricting (actively or through "friction") access to real wilderness to those qualified in terms of past experience and equipment. We, as a society, do not insist that everyone be admitted to all opportunities without fulfilling some requirements of adequate background. Persons seeking to develop wild land experience would be able to do so in many sections of DNPP without incurring unreasonable risk as a result of their inexperience. Beginners usually experience high levels of satisfaction in areas that provide wildness, but not real wilderness, since conditions are relative to their everyday or past experiences. Once they have gained enough experience to reduce the extra risks to their companions (and also potential societal costs resulting from emergencies attributable to inexperience) these individuals will undoubtedly move into areas that are either or both more difficult and more remote. This is as it should be. The result will be fewer people in trouble as well as less wilderness resource "consumption" and degradation.

3. I have serious concerns about over-reliance on visitor perceptions of their experience as a primary basis for setting standards and levels of maximum

Response to Comments

Dean-1

The National Park Service agrees that a reliance on visitor perceptions could allow a gradual decline in wilderness resource quality. Although visitor surveys would be used to monitor some resource impacts, the data that would be sought are objective and quantified, and meant to be compared to the standards articulated in the plan. As long as the standards are not adjusted over time, the use of visitor surveys should provide accurate data to assess the success of management in reaching the goals for each management area.

Comments

acceptable departure from undisturbed, natural conditions. The baseline should remain essentially fixed at extremely low levels of disturbance in areas intended to offer wild and wilderness experiences.

Discussion – As our country’s population grows and as the population is increasingly urbanized a larger and larger proportion of the visitors to DNPP will have a frame of reference that includes less and less wildness. Thus, in relative terms, there will be a trend toward the acceptance of conditions that include increasingly more and more disturbance.

A clear example of this phenomenon can be found easily in discussions of wildlife seen along the Park road.

It will be important to sample visitor reactions and make use of the information, but the underlying standards should not become increasingly tolerant in parallel with increasing scarcity of the wild land/wilderness resource.

4. All decisions relating to wild and wilderness country management should be as conservative as is possible in the sense of maintaining future options. This sort of resource is difficult if not impossible to rebuild and should not be jeopardized as a result of short-term convenience or the shortage of management resources.

5. Adaptive management is a powerful tool that should be used. It should not become a mechanism for shifting standards.

6. It is extremely important to insure the continuation into the future of conditions that will permit wildlife to return to habitat areas and features that have been used in the past but are not presently used, e.g. caribou calving in the Foggy Pass area, raptor eyes, movement corridors, etc.

7. I would urge a strong effort to return the Old Park to its freedom from motorized conveyances operating on the land and water surface.

8. I would recommend changing the phrase “Minimally Acceptable Resource Conditions” to “Maximum Acceptable Resource Conditions.” The implication of the former is the opposite of what is intended.

9. Reliance on voluntary cooperation, registration, etc. (a process mentioned several times in the Revised Plan) has not proven to be an effective mechanism for achieving desired outcomes. I suspect that this will be particularly true in a region well-known for the “independence” of its citizens.

More Specific Comments

a. The Revised Plan states that Alternative 4 (NPS Preferred) would require substantially more financial resources for its administration. This alone is a particularly strong argument against adoption of that Alternative. When considering how to handle what is basically a “one-time” resource in a period of tight (and shrinking?) agency budgets we should not rely on a plan that requires significant increases in financial investment to make it work properly. In fact, in such periods regardless of the chosen Alternative, the understanding should be that a shortage of management resources will automatically result in policies and procedures that will attempt to freeze conditions until management resources are adequate. (The shuttle does not fly with half a budget.)

b. In the description of Management Areas > Old Park > OPI: “...not accessible to motorized transportation besides from the existing road...” might be used to argue that motorized transport could be used in OPI if it started from the existing road. I would revise the wording unless your intent is to provide such a loophole; if that is the case I strongly disapprove.

Response to Comments

Dean-2

The modified preferred alternative adds a category for indicators related to wildlife population, distribution, and demographics. Although specific indicator and standard language would have to be developed during implementation, this change articulates the National Park Service intent to determine through monitoring whether changes in visitor use affect wildlife habitat usage. The agency could then use access management tools to prevent wildlife displacement from areas that have traditionally been used.

Dean-3

The column headings were changed to “Resource Condition” and “Social Condition” to eliminate the possibility of confusion.

Dean-4

Voluntary efforts may not always achieve a high success rate. However, in some instances 100% compliance is not necessary in order to achieve a management objective. If voluntary measures are not working sufficiently or the National Park Service does not believe they would work if tried, actions that are more restrictive are possible under the terms of the plan.

Dean-5

See NPCA-9.

Dean-6

The description of OP-1 was revised in response to other concerns. It now specifies that the management area “has limited opportunities for motorized access,” reflecting the fact that some motorboat and airplane access is allowed under regulation.

Comments

F. C. Dean - dena_bc_plan_comment

3

- c. Item "b" above may be especially relevant to snow machines; there have already been documented instances of the use of unauthorized snow machines in the vicinity of the East Fork Research Cabin. In at least one instance they appeared to have come south from the north boundary and then left along the road.
- d. Table 2-6 > Notes. The consideration of "displaced" visitors is extremely important! This is difficult to sample but critical. I am glad to see it explicitly mentioned.
- e. The visual impact of camping density does not seem to have been considered insofar as the experience of day hikers or people on the road is concerned. There is discussion of the choice of the camper regarding whether or not to locate his/her tent within sight of another tent. The other end of this interaction needs more consideration; the present "please do not camp within sight of the road," does not work. The problem of unnecessary consumption of wild country quality by tenters is especially severe given the bright colors of many tents.
- f. Shouldn't the use of power drills for climbing activities be prohibited in the Old Park as well as in the additions and the preserve?
- g. In developing Research Criteria and Guidelines I hope that the value of soundly planned and executed work will be recognized. The opportunity for study of the whole system at DNPP is nearly unique and should be recognized; the results are important for both management and for comparison with areas outside DNPP. I agree that research should be done carefully and as unobtrusively as possible. However, at times some intrusion should be accepted, especially if the impact is short-lived.
- h. The use of horses, probably most likely with guided trips, should be incorporated very carefully since these activities become a factor in the transport of invasive plants.
- i. It seems that a considerable body of published material on bears in Denali was not referenced. This is natural to the extent that the information may not have had direct applicability to specific topics in this report. However, some of the published material would appear to have been as, or more, relevant than material that was cited from work done well outside the region.
- j. The listings in the references are inconsistent in format and completeness. For anyone relatively unfamiliar with this material, especially the "grey literature", it would be difficult to make much of many citations as given.

Response to Comments

Dean-7

Visual impacts were not specifically utilized for indicators or as an impact topic in Chapter 4: Environmental Consequences. However, other indicators of use density (such as Encounters with Other People and Camping Density) would reflect the visual impact of camping, which is intended. For efficiency, individual indicators should stand in for as many variables as possible. The analysis of impacts to wilderness resources in chapter 4 should also provide adequate guidance for overall impacts, even though visual impacts are not specifically addressed.

Dean-8

The Wilderness Act already prohibits power drills within the Denali Wilderness, so there is no need for further action.

Dean-9

The National Park Service believes the *Final EIS* contains the most relevant information related to bears and the topics discussed in the plan. The commenter did not provide specific examples of the material he believes to have been omitted.

Comments

Response to Comments

DNPWC-1

See DCC-34.

503



DENALI NATIONAL PARK
WILDERNESS CENTERS, LTD.

Post Office Box 67
Denali National Park, AK 99755
Tel: 907-683-2290 • Fax: 907-683-1568
E-mail: info@campdenali.com

July 5, 2005

Mr. Paul Anderson
Superintendent
Denali National Park and Preserve
Post Office Box 9
Denali National Park, AK 99755

RE: Comments to the 2005 Revised Draft of the Denali Backcountry Management Plan

Dear Mr. Anderson:

We commend the framers of the Revised Draft of the Denali Backcountry Management Plan (DBCMP). The more measurable objectives of this plan should increase the Service's effectiveness in determining if, when, and what management tools need to be applied. Further, the Service's intention to utilize NPS/public sector working groups, if well facilitated, can increase buy-in of desired future conditions and build consensus around more innovative management tools than the agency may always be able to develop internally. Park administrators must make sure that monitoring protocols are both practical and fiscally achievable over the life of the plan. A twenty-year plan is only as good as the agency's ability to monitor its success and to implement appropriate management tools if necessary.

Management Areas

Kantishna Region

We endorse the "People for the Parks Alternative" for management plan areas. In particular, the Kantishna region of Denali National Park and Preserve should be managed as defined for Management Area B for the following reasons:

- Currently, the Kantishna region has a much lower level of human impact than other Service considers acceptable over the next twenty years. Backcountry users still experience resource and social conditions that resemble the minimally accepted standards for management.
- Except for the existence of a few mining trails, the backcountry is remote and requires self reliance.
- Although four visitor facilities could put as many as 150 park visitors into the backcountry each day, not all are backcountry users; some confine themselves to the road corridor, and some never even leave the lodges' premises. In reality, encounters with people in the backcountry are low.

An Unparalleled Setting • An Uncommon Experience

Comments

Response to Comments

- Visitors have at most three encounters with modern equipment or landscape modifications each day of their stay in the area, and most visitors have no more than one encounter.
- No human waste, toilet paper, or litter is encountered.
- Natural sounds predominate with motorized noise intrusions rare and usually faint. Because there is an airstrip and a commercial air service provider in the area, the Service seems to assume continued growth and soundscape deterioration over the next twenty years. To us, this is not an acceptable management direction and need not be the outcome if future concessions contracts are managed appropriately and the airstrip is maintained as a remote landing strip.
- This management plan's goals for the region have changed from past direction:
 - Planning documents in 1986 and 1997 speak to retaining use of this area to the levels that existed when each of those plans was developed. The 1986 General Management Plan stated that "any further development of commercial visitor facilities on private land in the Kantishna mining district will be considered incompatible with the planned purposes of the park...." (1986 GMP, page 17) The 1997 Entrance Area and Road Corridor Development Concept Plan (Front Country DCP/EIS) repeated that concept when the Service stated that it would "acquire development rights and/or property to retain the existing character and approximate level of commercial use at Kantishna." (1997 Front Country DCP/EIS, page 31)
 - The region's backcountry units, which were originally designed without limits, were subsequently limited to twelve each.
 - The National Park Service (NPS) continues to buy out patented mining claims in order to preclude additional commercial development.
 - Through this plan, NPS intends to restrict future commercial guided activities to 2004 levels.

In summary, this area, the geographic heart of Denali National Park and Preserve, is valued because of its remote character. The Service's preferred alternative will negatively impact the natural resource values of the region which, in turn, will negatively affect our business. We take exception to placing the Kantishna in a management area category that provides for any more natural sound disturbance, camping density, and encounters with people and large groups over the next twenty years than occurs today.

Access / Wilderness Management

Areas found suitable for future wilderness designation must be managed in such a way that they remain unimpaired for future consideration as designated wilderness. Only the access provisions in Alternative 2 can hope to achieve that mandate (NPS Management Policies, Chapter 6, Section 6.3.1):

- Define traditional activities for the park additions as for the "old park."
- Modify current regulations to restrict airplane and motorboat use only for traditional activities. (In addition, close Wonder Lake to summer airplane landings and use of motorboats, using management guidelines for "special resource and social conditions".)

Comments

- Allow airplane landings only at designated portals and the McKinley Park and Kantishna airstrips
- Register all day-hikers
- Restrict permits for climbing Mount McKinley to the existing level of 1300.
- No overland corridors

Commercial Services

Education

Education of national park visitors is one of the most powerful tools the Service can use to achieve its mission. The educational role of our national parks was emphasized by the late Yale historian and historical scholar of the national park system, Dr. Robin Winks, when he said that our national parks represent the world's greatest outdoor universities. Education is given little emphasis in this plan except as it relates to public understanding of "wilderness resource values" protected in the Denali backcountry. According to the plan, "education would focus on interpreting the wilderness resource values articulated in the Wilderness Management section of this plan." (page 38) We do not underestimate the importance of communicating the values of wilderness. In addition, though, for topics such as geology, glaciology, wildlife and plant ecology, and the history of man in northern environments, Denali is one of the world's most outstanding outdoor classrooms. Indeed, the park is being used as such by the NPS and certain of its non-profit and for-profit partners to educate park visitors about the natural and cultural resources of subarctic ecosystems. Education as a goal of backcountry management should be addressed with just as much thought and planning as recreation has been given.

Educational services vs. commercial activities that include education

The framers of the Revised Draft DBCMP characterize the NPS, educational non-profit organizations, and accredited institutions as having education as their primary purpose. On the other hand the framers presume that for-profit entities operating in the park cannot have education as a primary purpose. Although for-profits are generally thought to be established around a profit-making motive, they can be driven by other missions, including education. The following differentiations are used in the management plan:

- "Educational activities" vs. "commercial services" (page 2)
- "Educational programs" vs. "guided hiking activities" (page 2)
- "Educational group hiking" vs. "guided group hiking" (page 36)

Later in the plan, the following statement is made:

Although many concession-guided activities are also educational, these [following] programs are distinguished as having education as a primary purpose and being offered by the Marie Science and Learning Center (MSLC), non-profit organizations operating in the park under a cooperative agreement, accredited institutions or the National Park Service itself. (Revised Draft DBCMP, page 184)

We propose that our business does not fit the Revised Draft DBCMP definition of a commercial concession-guided activities provider that is "also educational" and do far more than meet the minimum educational criteria set for commercial services (page 56):

Response to Comments

Comments

1. Education drives our vision, our mission, goals, and action plans. It guides our marketing, staff training, and defines the ways in which we assist park visitors in their Denali experience. The following excerpt from our 2001 strategic plan reads:

<u>Vision</u>	An informed public will be responsible stewards of the natural world.
<u>Mission</u>	Providing active learning opportunities and fostering stewardship of the natural world through a tradition of excellence, community, and place
<u>Goal relating to guest experience</u>	To provide Denali National Park visitors the best in active learning experiences related to the natural and cultural heritage of the circumpolar north

2. Our business has long been recognized by the NPS as an educational entity. When we purchased Camp Denali, Regional Director, Brian Harry, wrote in 1976:

Camp Denali should be allowed to function in its present status as long as it remains an environmental education facility rather than an overnight accommodation destination point.

When our uses in the "old park" were granted, those field trips did not just have to have an educational component, their very purpose had to be education. In 1987, the Service granted Camp Denali an extension of its traditional educational program in the "old park" to guests at North Face lodge based on our intention to provide "the same or similar visitor services" under Section 1307 of the Alaska National Interest Lands Conservation Act. In the 1990s it was the education model of Camp Denali/North Face Lodge that spawned Superintendent Steve Martin's vision for the Murie Science and Learning Center (MSLC).

3. Our commitment to education is demonstrated through our philanthropic efforts. We provided seed money and in-kind support totaling nearly \$100,000 per year over five years to start the educational programs that are now offered through the MSLC. Today, Camp Denali and North Face Lodge guests, along with a 100% company match, contribute over \$24,000 per year toward the continued operation of the MSLC's education component. Over the past three years, an average of an additional \$50,000 per year has been contributed by these guests through the use of our mailing list for semi-annual appeals of the Alaska Natural History Association. Twenty thousand dollars per year of in-kind support assists the operation of a migration station that monitors songbirds and an accredited Alaska Field Course through the MSLC.

Our mission and actions supporting that mission demonstrate a singular commitment to education that sets Camp Denali/North Face Lodge apart from other commercial services operating in Denali National Park and Preserve. We view ourselves as a full-fledged, for-profit partner in education. In fact, for several years we have advocated that the Service include our educational program as part of our concession evaluation. We are not aware that the NPS has developed such a template.

Response to Comments

Comments

2 Using the Revised Draft of the DBCMP, we suggest that the Service consider designing a set of education-related criteria that define a fully integrated education partner to be included in our next concessions contract. Using those criteria, any such partner, along with the interpretive arm of the Service itself, would be evaluated annually to assure continued standing. The MSLC could provide training and certification for all the park's educators – whether a fully integrated education program provider or an entity that also provides educational services. Such a system could significantly enhance the quality of education in Denali National Park and Preserve and could become a model (as did public transportation) for the entire national park system.

3 Partnership vs. hierarchy
The plan states that when the Service must restrict group activities, priority is given to NPS discovery hikes, then to the MSLC, then to other non-profit entities, and last of all to for-profit (commercial) services. (page 57) A partnership is mutually beneficial, not hierarchical, because each entity brings to the achievement of a common mission what the other cannot accomplish alone. Formation of a working group to address social trail problem areas is a positive proposal. However, this process would be more productive if participants did not perceive that they were coming to the table with a “pecking order” in place.

4 Applicable laws, regulations, policies for guided activities and commercial services (page 22)
Section 1307 of the Alaska National Interest Lands Conservation Act (ANILCA) should be included as an applicable law. It guides the activities of “historic operators” and would have to be applied in the implementation of this management plan. For instance, available capacity for guided activities and educational programs should include historic operators. (Revised Draft BCDCP, page 57)

Relative to our historic operator status under ANILCA, an oblique reference to Camp Denali/North Face Lodge appeared in an addendum of the plan as a response to comments from Alaska Wildland Adventures:

While there is one operator who is entitled by law to offer guided hiking at the level offered in 1979, the extra increment added since 1979 by that concessioner would be subject to competition under NPS concessions law in the next contract period.
(Revised Draft DCMP, page 460)

Since our purchase of North Face Lodge in 1987, we have understood that all our “old park” activities were included under our historic operator status. Until reading through the addendum of this management plan, we were unaware that the Service viewed this differently. In our opinion, this is an issue that needs to be discussed and resolved between us and the NPS. We suggest that, given the timing of this management plan and its primary objectives, it is an inappropriate place for such a public notice.

Overflights / Commercial Airplane Landings

We understand the lack of control the Service has over park air space. We also know by experience how air traffic has grown from a novel sight in the backcountry to the point that it now disrupts the wilderness experience of park visitors. In our opinion, overflights in Alaska's

Response to Comments

DNPWC-2

The modified preferred alternative includes criteria for commercial services in the Denali backcountry that emphasize the importance of education as a prerequisite for commercial use. All NPS concessioners (other than transport services) would be expected to provide education about park resources and values as part of their operating plan. The National Park Service greatly appreciates the efforts of concessioners who go beyond the requirements and set a standard for others, but our goal is for all commercial service providers to be “fully integrated educational partners.”

DNPWC-3

See DCC-41.

DNPWC-4

Section 1307 of ANILCA is described in the chapter 1 of the *Final EIS*.

Comments

national parks should be managed to include flight corridors and flight-free zones. We encourage the Service to engage in vigorous efforts to protect Denali's soundscape through aviation working group consensus *and* through discussions with other agencies, such as the Federal Aviation Administration, as well as the Alaska delegation.

With respect to commercial airplane landings, we advocate that Alternative 2 guide the management of Denali National Park and Preserve over the next twenty years.

Guided Day Hiking

Level

The management tool described in the preferred alternative is not practical. The plan states that, "guided day-hiking could be offered in the old park with no more than the 2004 number of guided groups each season and using a similar proportion of off-trail to on-trail hikes." (page 72 and others) The occupancy of Camp Denali/North Face Lodge was not at capacity in 2004 as it was in the 1990s. Rather than selecting one year as a baseline, it is more reasonable to use the busiest business cycle over the past ten years. Additionally, because the MSLC is a new entity, use of the 2004 numbers would be premature.

The following solution could be considered. Apart from the NPS "Discovery Hike" program, this scenario utilizes the MSLC as the fee-based education program provider for the east end of the park and Camp Denali/North Face Lodge as the education program provider for the west end of the park:

NPS Discovery Hike Program	free ranger-led hikes throughout the park for individuals
Camp Denali/North Face Lodge	fee based; fixed at the level of use in busiest business cycle between 1994 and 2004; west end provider of educational programs for Camp Denali/North Face Lodge park visitors, including educational field trips/hikes with general use from west end to Toklat
MSLC	establish same level as Camp Denali/North Face Lodge uses; east end provider of fee-based, educational programs, including educational field trips/hikes with general use from east end to Toklat
Kantishna Roadhouse, Denali Backcountry Lodge	fixed at the level of use in busiest business cycle between 1994 and 2004; fee-based use of park additions and prescribed use of McKinley Bar Trail in old park for educational guided hiking
Other organized group entities requesting to do backcountry guided hiking	provided for by fee for service day use backcountry educational guided hiking programs of the MSLC – reservation required; based from the east end

Response to Comments

DNPWC-5

The modified preferred alternative indicates that the maximum number of guided groups in the Old Park backcountry (other than those on trails in the Wonder Lake area) would be determined by an average of the last five seasons (2001-2005) rather than a single year that might not represent usage or related impacts. A 5-season average provides a reasonable picture of the amount of use that is responsible for the resource and social impacts seen on the ground. The conclusion of this EIS is that the degree of impact from current levels of guided hiking in the Old Park is manageable, but no further impacts should occur. Since many of the resource impacts accumulate over time, an average of 5 years is a more appropriate methodology for determining a limit than the suggested tool of choosing the busiest year from the last 10 years. The 5-season average has been used to set limits on commercial airplane landings at the Kantishna and McKinley Park strips. The proposed restriction on the number of guided hikes applies only to commercially authorized groups; the MSLC would be addressed separately.

DNPWC-6

The National Park Service cannot select a particular commercial services provider in a planning document, but must follow the procedures outlined in regulation. The BCMP appropriately defines types, levels, and allocation of use in various areas of the backcountry as indicated by management area designation and present and projected future use levels. The BCMP provides guidance on what commercial guided day hiking could be considered necessary and appropriate, and the National Park Service intends to issue prospectuses for some of these services after the Record of Decision for the plan is signed. The MSLC is not a commercial visitor service and the scope of its activities is determined by its mission, not a geographic range within the park. However, its activities are also constrained by management area standards.

Comments

7
2. *On-trail vs. off-trail hiking*
Does this mean half of the groups on-trail and half off-trail or does the statement refer to the 2004 proportion of off-trail to on-trail groups? We presume it to mean the latter. The meaning should be more clearly articulated.

3. *What constitutes a trail*
Is a trail defined specifically as constructed and maintained? Does a trail include well-worn and generally utilized social trails? Two constructed, maintained trails are given as examples, but the discussion should more clearly indicate what is meant.

8
4. *Maximum of twelve participants including a guide*
We endorse this backcountry management tool and agree with the change from the original draft that provided for larger groups closer to the road. We would, however, advocate for a *seasonal average* of twelve participants including a guide for the following reasons:

- In our experience, a group of field trip participants may be made up of couples, so a maximum of twelve total may eliminate not just one, but two from a group.
- For many years we have hosted photography workshops, sometimes organized by other businesses that utilize a photographic educator. Airlines and lodging facilities will only provide price discounts for a minimum of fifteen participants. Their use of the park is either along the road corridor or to within about 150 feet of the road.

If an average of twelve participants including a guide is too difficult to manage, the Service could retain the current wording but allow for special situations to be negotiated in concessions contracts.

Backcountry Facilities

9
Campsites
We are against the proposal to establish up to five designated remote campsites in the Kantishna region of the park. The following considerations should be included in a larger discussion of the long term management of the Kantishna region before designated campsites are planned:

- proximity to private land and interruption of surrounding wilderness from established commercial facilities and private dwellings
- compatibility of day hikers, both independent and commercially guided, with backcountry campsite users
- compatibility of day hiking destinations with backcountry campsite locations
- necessity of restroom facilities and site accessibility for service park visitor "market" / "need" for this type of use, given the existence of the Wonder Lake Campground and backcountry units
- Visitor Transportation System schedule – campsites situated within reasonable distance from the road especially during the darker nights of August and September
- compatibility of backcountry campsites and users with subsistence hunters
- backcountry campsites in addition to or to replace backcountry permits for the affected units – discuss the total user impact for this region of the park at any one time

Response to Comments

DNPWC-7

The sections where the confusing references to trails appeared have been removed from the modified preferred alternative.

DNPWC-8

The group size limits were based on the best judgment of NPS resource managers, considering both physical and wilderness resources. It is important to note that the limit is a maximum, not a requirement, so a group of 5 couples and a guide would still be a viable party size. For the described photography workshop, as long as most of the party stayed within 150 feet of the park road, they would not be in the backcountry and the group size limits would not apply.

DNPWC-9

The text has been clarified to indicate that the backcountry campsites in Kantishna would be located "farther from the park road than the areas commonly used by day-hikers." Among the goals for the backcountry campsites is to pull the overnight backpackers out of the area used by the Kantishna lodges and day hikers, and provide a base for overnight backpackers to set up camp and explore other areas of the Kantishna. The National Park Service envisions that these sites would serve a portion of the overnight backcountry users already permitted in backcountry units 41-43, and the quotas governing the amount of dispersed overnight use would be adjusted to assure management area standards are achieved. In no case would management area standards be exceeded in this area, insuring that wilderness character would be protected.

The other concerns about restroom facilities, accessibility for service, VTS schedule, and subsistence conflicts are valid and important but are unlikely to provide insurmountable obstacles to implementation. The National Park Service intends to complete an implementation plan addressing both the formalization of the trail system in the Kantishna area as well as the siting and development of the designated campsites, and these issues would be addressed in that process.

Comments

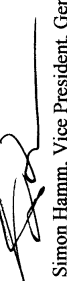
- educational program and/or commercial use vs. availability for individuals (Note: By mutual agreement, in 1975 Camp Denali gave up commercial overnight backcountry camping due to concerns about space availability for individual park users. If backcountry sites are available for commercial use, will this change in policy be managed to assure adequate individual visitor use?)
- prior park planning documents that sought to manage the center of the park as a low impact, small scale destination that did not diminish its wilderness character

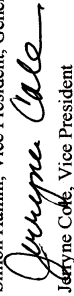
In the 1997 Front Country Plan, remote campsites were to be constructed based on visitor demand and resource protection needs. (Front Country DCP/EIS, 1997, page 31) In this present plan, construction of these sites is based on a different premise – that of providing a “different experience than is presently available which would appeal to some visitors who prefer to reduce uncertainty and difficulty in selecting a backcountry campsite.” (Revised Draft DCMF, page 399) In our view, the Wonder Lake Campground provides that kind of experience. The backcountry units in the Kantishna Hills, with their present limits, provide the next level of an encounter with wilderness, and resource impacts and have not yet suggested a need for designated campsites.

In closing, we appreciate the efforts of all who were involved in the careful redrafting of this management plan and thank the NPS for the opportunity to comment on its content. Our comments will hopefully assist the Service in producing a workable, final tool for the management of the backcountry of Denali National Park and Preserve. Please contact us with questions and/or clarification of our remarks.

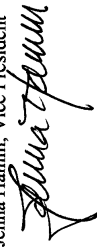
Respectfully,


Wallace Cole, President


Simon Hamm, Vice President, General Manager


Jerryne Cole, Vice President

Jenna Hamm, Vice President



Response to Comments

Comments



Denali National Park Concession Joint Venture

July 15, 2005

Mr. Paul Anderson, Superintendent
National Park Service
Denali Park & Preserve
P. O. Box 9
Denali Park, Alaska 99755

Dear Paul,

This serves as the Doyon/ARAMARK Denali National Park Concession Joint Venture's comments to the Denali National Park and Preserve Revised Draft Backcountry Management Plan (RDBMP) document issued April 2005.

The Doyon/ARAMARK Joint Venture supports Alternative 4, as stated in the RDBMP. We agree that this alternative provides the appropriate response to expand visitor experiences and opportunities within the Wilderness portions of the Park, as defined in the RDBMP, while maintaining the wilderness values this great Park was set aside to preserve.

However, the Doyon/ARAMARK Joint Venture is compelled to comment about language contained in the chapter 2, Actions Common page 57 under Commercial Services. While the Joint Venture supports that NPS Ranger led hikes have the first priority for providing guided activities and education services, that NPS strongly reconsider the remaining hierarchy as stated in priority order 2-4.

The Joint Venture recommends that language be incorporated allowing on a case by case basis an evaluation of the appropriate entity for providing these services, in cases where NPS cannot do so. For-profit businesses and specifically, the Doyon/ARAMARK Joint Venture may be better suited to provide these services than the MSLC and/or accredited educational organizations operating under a cooperating agreement for the following reasons:

- The Joint Venture has a demonstrated understanding of adhering to backcountry travel protocols that result in minimal impact to the wilderness resources as adopted and defined by NPS here at Denali. On the other hand, our staff has on numerous occasions observed other groups with certain concession permits not follow these protocols, e.g. hiking in a group single file vs. spread out laterally so as to not encourage social trails from developing. The many social trails that exist in the West District of the Park are a result of single file hiking.
- The Joint Venture has a demonstrated knowledge of managing people, their food and behavior that minimizes harmful interactions with wildlife. We have demonstrated this consistently with our tour product for the past 3 years associated with this contract and the previous 20 while operating as ARAMARK.

Response to Comments

DAJV-1

See DCC-41.

Comments

- Our Environmental Management System is certified to the ISO 14001 standard. Any guided activities the Joint Venture may undertake would expand the scope of our EMS to include these activities. As such, these activities would be subjected to re-occurring audits to ensure compliance with the standard. This ensures activities led by the Concessioner are benchmarked for environmental performance with measurable objectives and targets identified designed to achieve continual improvement in this area. The ISO 14001 standard requires this.
- The Concessioner and many of the staff the Joint Venture currently employs has a demonstrated competency in providing environmental education programs and guided hikes. It was the Concessioner who started the Denali Foundation in the late 1980's. It started with developing and implementing Denali Elderhostel programs in 1985. These programs led to the development of the Denali Foundation which has grown and diversified over the past 20 years. For many of these years, particularly the first 10 it was concession staff who taught the EH programs and led guided hikes and other activities associated with this program. The Concessioner has also provided environmental education programs for school groups prior to the current Denali and Discovery Day programs. Now, the Concessioner supports these programs with donated transportation services.

The Doyon/ARAMARK Joint Venture understands that the language as written on page 57 of the RDBMP needs to be enduring and ensure the appropriate entities are "protected." However, because in our opinion the Doyon/ARAMARK Joint Venture is unique in its competencies regarding environmental education and interpretation, so long as these competencies remain the Joint Venture should be considered equally with other entities for opportunities to provide guided activities and educational programs. This could be achieved if the last section of COMMERCIAL SERVICES, page 57 be re-written identifying a process whereas entities that might compete for these opportunities be allowed to do so and awarded based on actual ability and competency, rather than organizational type.

Thank you for considering these comments.

Sincerely,

Dominic Canale
District Manager
Doyon/ARAMARK Denali National Park Concession Joint Venture

Response to Comments

Comments

To:
Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali National Park, Alaska 99755

May 30, 2003

From:
Gordon Haber
P.O. Box 64
Denali National Park, Alaska 99755

Sent as a PDF file via e-mail

Re: [Comments on Denali Draft Backcountry Management Plan](#)

My primary concern about the Draft Backcountry Management Plan for Denali National Park and Preserve (February 2003) is that it poorly represents the world-class wildlife values of the area and potential impacts of the various management alternatives on these values.

It should be remembered that Denali National Park was created in 1917 primarily for its wildlife values, and that most of the boundary alterations over the decades – especially under the Alaska National Interest Lands Conservation Act of 1980 – were intended to provide greater protection for wildlife and wildlife habitat. It was specifically because of recognition that the “old park” north boundary area from Healy to the Kantishna Hills was so important to the integrity of core park wildlife systems but was inadequately protected that the entire “d-2” provision of the Alaska Native Land Claims Settlement Act began receiving major attention in the mid 1970s. This happened through the efforts of Ann Morton, via her husband Rogers Morton, then Secretary of the Interior, because of Ann’s trips to Denali for three successive winters and one fall, 1972-1975, to observe wolves. This provided her with a first-hand understanding of the north boundary area as wintering habitat for Denali caribou, moose, sheep, and wolves.

Thus it is surprising to find almost nothing in the Plan about the wildlife importance of this area and the need to ensure that it remains free of development and other incompatible encroachments – i.e., “Stampede Flats” (Healy to Kantishna Hills, from the Outer Range north to and including the Outer-Outer Range [next set of foothills, north of the Stampede Trail]). This becomes all the more important in view of recent state and federal initiatives toward road and/or railroad access to Wonder Lake through the area and the creeping westward expansion of residential subdivisions from Healy. The Plan should take the lead in calling attention to resulting problems for Denali’s wildlife.

Response to Comments

Haber-1

The area of the “wolf townships” is outside the park boundary, and therefore outside of the scope of this plan. However, the wolf townships have long been recognized for their ecological importance to Denali. The 1986 General Management Plan included a land protection plan in which this area was considered the highest priority for protection. For topics outside of the scope of the backcountry management plan, the 1986 GMP and the accompanying Land Protection Plan still apply.

Comments

2

The Plan should propose levels of wildlife habitat protection for this area comparable if not equal to what exist for the “road corridor” and other interior areas of Denali, because it is integral to protecting wildlife that seasonally shift or migrate from these areas. It should advocate resumed negotiations for a land trade, cooperative management, or other means to guarantee the same protection for the state-owned “wolf townships” that extend from Healy almost to the Sushana River (i.e., the lands designated an “Area of Ecological Concern” in ANILCA).

Denali and sometimes other caribou use Stampede Flats heavily by mid winter in most years, probably largely because the wind patterns of this area tend to prevent as much snow buildup and thus allow easier foraging vis-à-vis surrounding areas. Likewise, as snow depths reach threshold levels in the road corridor areas there are major temporary northward shifts of moose and sheep to the north side of the Outer Range and southern areas of Stampede Flats. And this ungulate activity draws major segments of the park wolf population for varying winter periods. Not uncommonly at least 5-6 of the dozen or so groups of wolves that reside primarily in other areas of the north-side park/preserve shift or migrate to Stampede Flats for increased winter hunting opportunities, related to this heightened ungulate (especially caribou) activity.

A substantial portion of this migratory activity originates from the Kantishna Hills and south and west of Wonder Lake. As caribou from the Wonder Lake area and west migrate northeastward across the Clearwater Fork-Stony Creek drainages into Stampede Flats, wolves soon begin following from these areas, sometimes making several trips back and forth and going as far east as the Savage River area and, in at least two cases since 1999, even to Jumbo Dome (northeast of Healy). At least two groups of wolves from the Muddy River-Wonder Lake-Moose Creek area undertake eastward migrations into Stampede Flats regularly, and several others do so sporadically. Last winter (2002-03) the latter included a group of 12 from the Muddy River-Foraker River area and nine from northwest of Kantishna (this group also seems to be expanding or shifting its territory somewhat eastward, into the southern Kantishna Hills). Most management concerns about Denali wolves focus on northward and eastward winter shifts and forays by the eastern road corridor groups – Toklat/East Fork and a succession of groups to the east (Savage-Headquarters-Sanctuary-Margaret). However it should be emphasized that the winter importance of Stampede Flats heavily influences wolves and other wildlife from areas much further to the west as well. Inadequate protection and continuing ecological erosion of this area imply serious ecological consequences for traditional wildlife patterns over much larger areas of the park/preserve.

The 80-100 wolves that reside primarily within the north-side park/preserve are of well-established ecological, scientific, and visitor-viewing importance. Yet, not only does the Plan

2

Haber-2

Response to Comments

The BCMP is primarily a plan for managing recreational use of the backcountry, not for managing wildlife. The impacts of plan actions on wolves and other wildlife species are considered in Chapter 4: Environmental Consequences, but specific actions related to wildlife management are outside the scope of this GMP amendment.

Comments

3

slight Denali wolves (and other wildlife) via its inattention to the importance of Stampede Flats, it also fails to address crucial needs with regard to the continuing vulnerability of these wolves, including the oldest family lineages, to hunting, trapping, dog-related, and other human impacts, inside the “old park” and 1980 park additions as well as outside. One suspects this is related to the selective, indeed pitifully inadequate, use of the large amount of wolf and wolf-ungulate research information that is available for Denali. Citations to a few bits and pieces of this research – published and unpublished – appear here and there haphazardly. Notably, not a single reference to *any* of my Denali wolf-ungulate research appears in the 464-page Plan, even though this research is current, has been ongoing for 38 years, and has produced more published and otherwise-reported results than any other source. This includes published challenges to some of the research the Plan *does* cite. This is not the place to try to plug such a gaping hole. Suffice it here for me to offer to meet with the Plan’s authors to whatever extent is necessary to ensure that the next draft adequately incorporates this and other research, including current radio-tracking data related to the importance of Stampede Flats and results pertinent to hunting, trapping, dog, and other human impacts.

G.H.

Response to Comments

Comments



537

July 15, 2005

Mr. Paul Anderson
Superintendent
Denali National Park
P.O. Box 9
Denali Park, AK 99755

Denali National Park
Talkeetna Ranger Station

JUL 15 2005

RECEIVED

Dear Paul,

Below, please find our company's comments that are intended to support or further emphasize issues outlined in the Talkeetna Air Tour Industry's comments or to address concerns that are specific to K2 Aviation.

K2 Aviation's Objective:

Work with National Park Service to maintain environmental integrity and enhance quality of visitor experience in Denali National Park. K2 Aviation does not support any of alternatives outlined in the Denali Backcountry Draft Plan.

Air Tour Overflights and Restrictions - Concerns

NPS is identifying areas for different levels of allowable sound disturbance. The "soundscape" will be monitored following the implementation of the Denali Backcountry plan and recommendations for change will be made at the end of a five-year period.

Our Concern:

We are concerned that this could lead to regulation of flight routes and limit accessibility in the future. Additionally, we question why NPS feels it necessary to designate quiet areas on the southside of Denali when it is only accessible by airplane. Moreover, how important is it to keep areas quiet if there is no one there to hear the noise?

Changing the environment by recording glacier landings:

When the Talkeetna air services were concessioned, NPS began to track landings and suggested that future quotas may be based on these numbers.

Response to Comments

K2-1

The Access section of the BCMP provides a variety of tools that could be used to manage airplane access in the future if necessary. The text under AT-4 addresses the question of managing areas for natural soundscapes even when airplanes are the only means of access. The modified preferred alternative does not propose to eliminate air taxi access anywhere in the park additions and preserve; a certain amount of noise is tolerated in all management areas in order to provide reasonable access to wilderness recreational activities.

Comments

Our Concern:

While we do not object to NPS's efforts to monitor landings, we are concerned that visitor safety may be compromised if landing records generated from such monitoring are used to establish future landing quotas. For instance, some operators may be tempted to increase their normal number of landings and perhaps even continue to land before and after the regular season, when glacier conditions are not safe for landing, in order to boost their numbers and increase their future landing allocation.

Limiting Scenic Landings

NPS has agreed to establish a work group to look for ways to decrease noise in certain areas. NPS representatives have been tracking glacier landings and have indicated that they will be capping them in the future.

Our Concern:

- We would like to see the composition of the work group defined and balanced with appropriate members.
- Glacier landings provide virtually the only access to the south side of a largely inaccessible park with minimal impact to the environment or users.
- Limiting the number of glacier landing passengers conflicts with NPS goals to reduce noise. It increases the volume of over flights because airplanes will fly more trips when they are not spending time parked on glaciers. Limiting the number of glacier landing passengers has no effect on noise.
- Limiting the number of glacier landing passengers will make glacier landings unaffordable for the flightseeing passenger and climber.
- Scenic landings provide the most access for the public into the southside of Denali. NPS has expressed concern that noise may affect climber's experience or those scenic landing passengers. We feel that it not right to favor climbers and their desire for solitude given that they access the park by airplane. As far as the scenic landings passenger's experience, there has been no data to date to indicate this is an issue.

Commercial Airplane Landings:

In the preferred alternative #4, National Park Service has restricted scenic air tour landings yet has imposed no restrictions on climber related landings in the park. The Piika and Eldridge Glaciers (which have a history of use by both climbers and tourists) are being restricted for scenic landings when mountaineers are present. Scenic landings are restricted

Response to Comments

K2-2

Although this suggestion appeared in the original draft of the BCMP, it did not appear in any alternative in the revised draft.

K2-3

The National Park Service does not propose limiting the number of glacier landings in the modified preferred alternative, although establishing limits remains an option for the future. The primary concern is to mitigate the noise from airplanes, along with minimizing the number of encounters on the ground with motorized/mechanized equipment. The number of glacier landings could continue to grow given quieter equipment; the number of passengers could continue to grow given more efficient seating and larger planes (see AAC-15). The National Park Service intends to work with the Aircraft Overflights Working Group to address noise from aircraft that do not land. The Working Group would represent all interests in aircraft overflights and would be constituted appropriately under the Federal Advisory Committee Act. Although it is true that the National Park Service does not have regulatory authority over the park's airspace, establishing geographic limits on landing areas can have a positive effect on portions of the natural soundscape in the Alaska Range; for example, large numbers of scenic air tours would not fly over areas such as the Eldridge Glacier unless they were going there to land.

Although the National Park Service is concerned about potential impacts to scenic air tour passengers' experience from high traffic volumes around glacier landing areas, this issue is not advanced as a driving concern for the alternatives proposed in the *Revised Draft EIS* or *Final EIS*. Thus, no data were provided that would reflect on the issue.

K2-4

See AT-12.

Denali National Park
Talkeetna Ranger Station
1/11/15 2005

RECEIVED

3

4

Comments

Response to Comments

K2-5

See AT-10.

to Management Area A. All the landing traffic would be funneled to the Ruth Glacier.

5

Our Concern:

The glaciers are dynamic. We do not know that the Ruth Glacier will continue to be the best place to land in future. Additionally, we object to restricting scenic landings at the Eldridge and Pika Glaciers when they have historical use for both scenic landings and climbers. Who is to say that the Eldridge may not be the best place to land scenics in the future?

Denali National Park Growth


One of the primary reasons for the Denali Backcountry Plan is to deal with future growth in the park. In the past five years, it is our understanding that DNP actually saw a decrease in numbers. We understand that the Denali Backcountry plan would only be implemented when numbers are increasing.

Our Concern:

I am concerned by implementation of any limits without NPS demonstrating an increase in numbers.

Thank you for your thoughtful consideration of our comments.

Sincerely,


Todd Rust

Stephanie Rust

Denali National Park
Fairbanks Ranger Station

JUL 15 2005

RECEIVED

Comments

543



Superintendent
Denali National Park
PO Box 9
Denali National Park, AK 99755

7/15/05

Re: BCMP Comment

Dear Sir,

My comment deals specifically with the issue of over-flight restrictions. I am not in favor of any change that would specify exact routes, exclude any sizeable area from over-flight, or otherwise limit flightseeing activities. My position is based on 12 years experience as a professional pilot in Denali, and includes the following points:

1. Safety and regulatory aspects of over-flight are already adequately addressed by FAA rules, common operating practice, and voluntary procedural compliance by local businesses. The mechanism already exists to implement and enforce any change that may be required for these reasons in the future.
2. Most flightseeing passengers are not "backpacker/outdoorsy" types. They are predominantly middle-aged (or older) vacationers who want to "see" the park--not "use" it. They have spent their whole lives paying for these parks. They should not be disenfranchised (or made to sit in a bus for hours).
3. The goal of environmental preservation is well-served by aviation. Aircraft don't trample tundra, harass wildlife, leave trash, etc. Aviation provides a clean way to provide public access to public assets.
4. The public is well-served by aircraft that are free to provide the best experience possible. Localized weather conditions that require flexible routing are a greater factor in Denali than they are over the Grand Canyon (or other controlled-flight areas). Constrained routes or procedures would only degrade the quality of the passengers' experience.

I do not favor an airborne free-for-all (which would be in nobody's best interest). I am aware of the controversy over aircraft noise. I feel that this issue, and others, is more properly addressed on a case-by-case, communicate, compromise, and comply basis, than by the best efforts of bureaucrats, looking far into the future, to determine any particular requirement. OF the available alternatives, I favor a NO CHANGE TO CURRENT POLICY course of action. I would be pleased to discuss this matter at any time.

Sincerely,

James D. Morgan

Response to Comments

Morgan-1

FAA regulations are intended to provide aircraft and passenger safety in the Denali airspace as well as everywhere else in the United States. However, FAA regulations do not generally address resource protection concerns in national parks or the experiences and safety of park visitors on the ground, particularly in the unusual conditions around glacier landing areas in the Alaska Range. Such concerns are appropriate topics for consideration within the Denali BCMP.

Morgan-2

The preferred alternative of the *Revised Draft EIS* and the modified preferred alternative of the *Final EIS* take into account the many park visitors who would like to experience the resources and values of the Denali backcountry but are not capable of backcountry travel without assistance. The modified preferred alternative provides opportunities for those visitors, including opportunities to use airplanes to land within park boundaries.

Morgan-3

Aircraft access is environmentally friendly in the ways cited by the commenter. However, aircraft are not without impacts to park resources. Particularly in an area renowned for its wilderness resource values, the noise and presence of aircraft have substantial impacts on park resources and visitor experience. These impacts are documented in Chapter 4: Environmental Consequences.

Morgan-4

The National Park Service agrees that the public should be provided with the best experience possible, with two qualifiers. First, the National Park Service is responsible for protecting park resources, and those resources are defined by statute. The National Park Service mandate is to provide the best visitor experience possible consistent with protection of resources. Second, the National Park Service often has multiple user groups, and providing the best experience for one may reduce the quality of the experience for others. This planning process should help the National Park Service provide the best possible experience for all user groups, in part by reducing these types of user conflicts. Aircraft routing is one possible tool that could be used to accomplish resource protection and to reduce user conflict, although it is certainly not the only tool. The modified preferred

response continued on next page

Comments

Paul R. Anderson, Superintendent
Denali National Park and Preserve
P. O. Box 9

Denali National Park, AK 99755
[DNA BC Plan Comments@nps.gov](mailto:DNA_BC_Plan_Comments@nps.gov)

Comments on Revised Draft EIS on Denali backcountry plan (26 June 2005)

Dear Mr. Anderson:

Thanks for the opportunity to comment on the 575 page Revised Draft EIS of April 2005. I first visited Denali National Park in 1985 when I established Alaska residency and have visited it many times since in both summer and winter. I previously provided comments on the draft backcountry EIS for Denali on 22 May 2003.

I applaud your strategy to define Alternatives 1-5 as sets of desired future conditions for backcountry management areas in the Old Park and the ANILCA expansions of the park and preserve. It may seem desirable to define indicators or "performance standards" by which to measure progress toward future conditions or the degree of resource degradation under specific regulations. However, the process of managing by performance standards, whether in industry or natural resources, essentially works by trial and error in the beginning. Error in the form of allowing structures in wilderness-quality lands or allowing physical damage to surface resources (e.g., trail erosion from overuse, snowmachine damage to alpine vegetation when snow cover is inadequate) greatly compromise wilderness character because they respectively require removal or time for recovery. If the goal of the NPS is to maintain a defacto wilderness character on the 2.25 million acres of lands proposed for Wilderness designation in 1988 (as stated on pp. 26-27), you should consider a more conservative "prescriptive standard" that provides the greatest margin of error in not degrading physical (ultimately aesthetic) conditions on NPS lands. Alternative 2 provides the closest match to such a prescriptive standard.

Another caution is that allowing greater access with a promise to evaluate performance standards will require more funding for administration and evaluation of effects of visitation, particularly when it allows motor vehicles (as compared to foot traffic) that could potentially damage vegetation, cause erosion, create noise, or disturb wildlife. The current administrations in state and federal government are pushing strongly for privatization of public services and user fees. Under this model, user fees will need to be assessed from motorized users to meet the increased need for backcountry rangers to monitor effects of motorized uses on the physical and biological environment and soundscape. The most fiscally conservative choice with respect to field staff needs and maintaining the greatest future options for wilderness designation and wildlife conservation is Alternative 2.

Regarding motorized access to ANILCA park and preserve lands for "traditional activities," I don't see how NPS can allow snowmachines for non-subsistence uses without heavy law enforcement to prevent abuse to living resources. The primary

Response to Comments

alternative specifies goals for various areas of the park, and sorts out which areas are managed for particular visitor opportunities. However, it leaves flexibility for the National Park Service to decide what tools to use for implementation. Addressing aircraft routing could only be accomplished by establishing voluntary agreements with aircraft operators or through collaboration with the Federal Aviation Administration.

Morgan-5

The National Park Service agrees that much progress can be made through communication on this issue. The Aircraft Overflights Working Group included in the modified preferred alternative would provide a forum for this type of interchange to occur.

Paragi-1

The modified preferred alternative specifically indicates that the National Park Service can take action prior to resource damage occurring. It is incumbent upon the National Park Service to act conservatively to prevent irreversible errors.

Comments

2 establishing intent of the Old Park (p. 7 and p. 9) was as a “game refuge” in which compatible public uses were allowed. Viewing of wildlife and scenery would be the

excuse used by people fully intending to race around highmarking. Snowmachines driven by irresponsible people have great potential for damaging vegetation, particularly in windblown areas, and disturbing big game to the point of fleeing (personal observations of highmarking further east in Alaska Range; illegal by Alaska Statutes if intentional). Denali Highway, Denali State Park, and the Stampede Trail provide huge areas of road-system public lands open for snowmachine access that offer views of Denali or other scenic vistas in the Old Park on clear days. A person has far greater wildlife viewing opportunities and much lesser chance of disturbing animals if they leave a snowmachine and continue on quietly by snowshoes or skis.

3 Setting comparative performance standards can become a slippery slope when decision makers lose perspective. Comparative standards tend to be relaxed over time as

conditions deteriorate elsewhere (“still relatively good here...”) because of increasing population density, environmental contamination, decline of a land ethic, and other reasons. Alaskan national parks are the closest proxy to ecological and aesthetic benchmarks that we have in the United States. The most knowledgeable people on historic conditions in Denali are people who have lived or worked in the area (such as retired wildlife researchers, climbing guides, etc., p. 178)—they are often better suited than transient agency staff to know what is at risk of being lost. Setting absolute standards on degradation of the land, living resources, or soundscape by simply saying “no” to continued or expanded uses is an option that needs to be considered (tool number 9, p. 51) for backcountry with wilderness priority (e.g., Management Areas E and OP2).

4 In defining boat access, NPS needs to clarify its policy on airboats, which to my

knowledge are not classified as watercraft by the State of Alaska. Shallow braided rivers that challenge access even by jetboats can be readily traveled by airboats because of their low draft and ability to travel overland in some terrain. The noise of airboats is highly disturbing to wildlife and many people and is not what I consider “reasonable access” to NPS lands because it disturbs virtually all other uses.

Allocation of backcountry uses is an economic consideration for local communities in the RDEIS (p. 28). A recent study on the Gallatin National Forest in Montana demonstrated that non-motorized uses had a greater economic benefit to local communities than motorized uses (McMillion 2005, cited below). Visitor demographics and spending statistics for both summer and winter would be required to make this type of comparison in the Denali region.

Finally, I concur with the State of Alaska comments that a 24-hour advance registration system be considered for backcountry camping permits (p. 480, first paragraph). Reservations could be released to someone else on standby if the person who registered in advance does not appear at the NPS registration facility by an appointed time. Advanced registration could be done by phone during business hours or by internet anytime, as Alaska State Parks and BLM currently do for backcountry cabin registrations.

Response to Comments

Paragi-2

The modified preferred alternative is not intended to allow incompatible forms of recreational activity to occur in Denali, including high-marking, racing, or any operation of equipment that harasses wildlife or damages vegetation. One of the management tools identified by the modified preferred alternative is “enforcement of existing regulations,” which would resolve the issues mentioned. Enforcement of snowmachine speed limits would effectively prevent high-marking or racing activity. There are also existing rules that prohibit vegetation damage and harassing wildlife. The modified preferred alternative calls for increases in patrol rangers to better enforce these existing regulations.

Paragi-3

By providing objective measures of resource and social conditions, the modified preferred alternative should provide insulation against slipping standards. Although provision is made to adjust indicators and standards based on new information gained during the early period of monitoring, ultimately visitor use should be adjusted, not the standards, in order to insure protection of park resources.

Paragi-4

Motorboats are generally allowed in Alaska national parks by 43 CFR 36.11(d). However, while the National Park Service has not issued a nationwide rule, regulations have tended to treat airboats as something other than a “motorboat.” Regulations for Big Cypress National Preserve at 36 CFR 7.86(a) define airboats as motorized vehicles along with swamp vehicles, air cushion vehicles, automobiles, and trucks, distinguished from motorboats that are driven by a propeller in water. Regulations for the Alaska National Wildlife Refuges at 50 CFR 36.2 define airboats as off-road vehicles, not as motorboats.

Comments

Tom Paragi
1271 Lowbush Lane
Fairbanks, AK 99709-6039

McMillon, Scott. 20 June 2005. Proposed restrictions on motorized use on the Gallatin wouldn't have much impact, study shows. Bozeman Daily Chronicle, Bozeman, Montana. (<http://bozemandailychronicle.com/articles/2005/06/20/news/01impact.txt>)

Response to Comments

Comments

P.O. Box 766
Talkeetna, AK 99676
June 24, 2005

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

Via e-mail: DENA_BC_Plan_Comment@nps.gov
Via fax: 907-683-9612

Re: Denali Draft Backcountry Management Plan Comments

Superintendent:

I have lived and recreated in the northern Susitna Valley for many years and am quite familiar with the south side of the National Park and Preserve ("Park") and adjoining lands.

I support Alternative 2, which I believe is the only alternative that adequately protects Park resources and wilderness values.

I am troubled, first of all, that your preferred alternative this time around is "4." Despite 93% of the comments on your previous draft urging adoption of Alternative B, your preferred Alternative 4 is at the same place on the protection of wilderness values versus development/access spectrum as your previous Alternative D. The question that jumps out in my mind is whether you are being responsive to the wishes of the public when you "prefer" Alternative 4.

An example of how Alternative 4 is inappropriate is Management Area A, on the south side between and on either side of the Ruth and Tokositna glaciers. The minimally acceptable resource or social conditions that this draft prefers under Alternative 4 are higher than I would deem appropriate. My understanding (per NPS statement at public meeting) is that Management Area A was chosen for this area to accommodate demand 20 years hence. If meeting future demand, which is uncertain and speculative, is the driver of the Management Area designations, then you have a formula for continued and progressive deterioration of Park wilderness values and resources. Since demand over the long term is unlimited, a policy to meet demand means that Park resources cannot avoid being indefinitely whittled away. Management decisions should be driven, first and foremost, by the protection of Park wilderness resources and values.

I don't think that the system you have devised for monitoring resource damage and enforcing restrictions will function effectively in practice. First, it appears that regulatory action will only be taken after resource damage occurs. That means that the damage is done, and all you can do, at best, is prevent further damage. It is important to develop a mechanism, in this Plan, for protecting the resource before the damage occurs.

I also question the practical feasibility of NPS monitoring and enforcement: to properly assess impacts and damage to Park resources and carry out enforcement actions to restrict or modify use in the impacted areas. NPS is facing seemingly unending budget

Response to Comments

Strasenburgh-1

The National Park Service agrees that the protection of park resources and values, including wilderness resource values, is of primary concern. The Overview of the modified preferred alternative was clarified to demonstrate that the National Park Service seeks to provide a variety of appropriate recreational opportunities in the park and preserve, but not necessarily to accommodate all possible future demand. However, the National Park Service does expect that the management area designations would allow for some growth in all categories of backcountry visitation.

Strasenburgh-2

See NPCA-1.

Strasenburgh-3

See PTP-4 and DCC-30.

Comments

reductions, and I don't see how the staff and funds will be available to do the job. In addition, my experience has been that the more an activity or use becomes entrenched, the more difficult it is to restrict. It appears to me, particularly with regard to snowmachine use, that the flood gates are being opened, and I don't see how they can be closed.

4
With regard to corridors depicted on Maps 2-10 and 2-11, I urge you to remove the corridor on the upper Tokositna River that extends from Park boundary to the Kanikula Glacier. I have traveled to the foot of the Kanikula Glacier by dogteam. The stretch of the Tokositna River upstream from the foot of the Tokositna Glacier is a very special area in terms of wildlife and wilderness values. There is a place near the foot of the Tokositna Glacier where the Tokositna River crosses the valley and provides a natural barrier. Many snowmachines turn around there. To get beyond that point usually requires crossing open water (a small riffle). This would be a logical place to prohibit snowmachines from traveling further up towards the Kanikula Glacier. In the past, if one persevered upstream past the riffle, one was rewarded by an abundance of wildlife sign and a sense of wilderness. Unfortunately, an increasing number of snowmachines are traveling to the upper reaches of the valley. As a consequence, I am unable to experience the Park's wildlife and wilderness. I do not go to the Kanikula Glacier to be offered a beer (which happened once), but to marvel at the grandeur of one of the most beautiful places I have ever been. The Tokositna valley upstream from Bunco Lake, not so many years ago, had that sense of wilderness. Now the snowmachines have overrun the place. I think it is important to the wildlife and to those who value quiet recreation be allowed a pristine experience with reasonable access from the south side. Choosing Alternative 2 or modifying one of the other Alternatives to prohibit snowmachines in this corridor would accomplish this.

The letter EPA wrote in comment to your previous draft did an excellent job of detailing the adverse impacts that snowmachines have on vegetation, wildlife, water/wetlands, and the natural soundscape. The letter states that snowmachine use "has the greatest potential to cause significant environmental impacts," and "snowmobile use is likely to grow rapidly at Denali National Park." This, coupled with the adverse impacts that snowmachines have on non-motorized users (e.g., noise, smelly exhaust, tracked up snowscape, trails ruined by paddle tracks), makes a compelling case for prohibiting snowmachine use, and I urge you to do just that in the entire Park and Preserve. I realize that this is a thorny issue and I have read your response to EPA concerns (page 435), but nonetheless I believe that you have to do considerably more than Alternative 4 to protect Park resources from snowmachine use.

Thank you for this opportunity to comment.

Sincerely,

John Strassenburgh

Response to Comments

Strassenburgh-4

The preferred alternative was modified to end the winter season Corridor on the Kanikula at the mouth of Wildhorse Creek. However, snowmachine access for traditional activities could occur beyond that point. Standards for Management Area A would apply in the area upstream and around the Corridor.

Comments

16/05
COMMENT TO BACKCOUNTRY PLAN

NO MATTER WHAT PLAN ULTIMATELY COMES TO PASS IT WILL BE WOEFULLY INADEQUATE IF IT DOES NOT ADDRESS THE INVASIVE LOUD AIR TRAFFIC NOISE OVER THE WEST BUTTRISS ROUTE. ONE PASS THROUGH FLIGHT'S IN TRANSIT DON'T INVADE OUR MINDS THE WAY CIRCULAR GRINDING CLIMBER SPOTTING FLIGHTSEEING DOES. MOST TRANSIT FLIGHTS CROSS THE RANGE LOW (11 TO 12000 FT) AND DON'T PRODUCE THE STRESS OF THE HIGH ALTITUDE TOURING FLIGHTS DO. THE PITCH CHANGES AT ALTITUDE MAKING THE NOISE MORE UNBEARABLE. WE ARE THE OBJECT OF THE VIEWING AND THEREFORE THE FOCUS OF THE MOST INTENSE EAR SPLITTING PROP BLAST. THIS IS ALL TAKING PLACE IN THE WILDERNESS... WHAT WILDERNESS? LOUD OBNOXIOUS MECHANICAL NOISE IS INCOMPATIBLE WITH THE VERY EXPERIENCE WE WANT TO PRESERVE.

Response to Comments

Tejas-1

The upper elevations of Mount McKinley are within the West Buttriss Special Use Area and OP-1 management areas in the modified preferred alternative, which is appropriate since this part of the mountain is also within the congressionally designated Denali Wilderness. Both of these management area designations allow only a "low" level of natural sound disturbance. Because Mount McKinley is a focus of visitor activity, an important park resource, and in designated wilderness, the National Park Service anticipates that addressing user conflicts and resource issues related to aircraft use around the mountain to be one of the most daunting tasks in implementing the BCMP, particularly since the National Park Service has no regulatory authority over airspace. However, the modified preferred alternative does provide clear guidance as to desired future conditions on Mount McKinley and provides tools sufficient to achieve those conditions. Some of these tools, i.e., involving the regulatory authority of other agencies such as the Federal Aviation Administration, would have more barriers to implementation than actions the National Park Service could take on its own.

Comments

~~THE~~ DENALI IS A BIG MOUNTAIN WITH AN EAST SIDE AND A NORTH SIDE THAT HAVE VERY LITTLE CLIMBING ACTIVITY. LET'S RELIEVE THE GROUND USERS OF THE PARK FROM THE TRANNY OF THE PLANES. THIS AIR SPACE NEEDS TO BE CONTROLLED BEFORE THE SITUATION BECOMES UNBEARABLE AND THE QUALITY OF OUR WILDERNESS EXPERIENCE IS TOTALLY RUINED.

THERE IS ONE OUTFIT THAT EMPLOYS TWIN ENGINE AIRCRAFT THAT DIVE BOMB THE UPPER MOUNTAIN ON A CLEAR DAY. THEY START EARLY (7:30AM) AND GO ALL DAY LONG (AK SUMMER DAY) SOMETIMES 2 OR 3 OVERHEAD AT ONCE. THIS IS A POOR EXPERIENCE. WE CAN DO BETTER. WE NEED TO MEASURE THE DB IMPACT AT 17,200FT. WE NEED TO HAVE AIRCRAFT CONVERTED TO ACCEPTABLE NOISE LEVELS. PLEASE HELP! VERN TEJAS

Response to Comments

Comments

Comments for: Denali National Park and Preserve Backcountry Management Plan

Denali National Park and Preserve Mission Statement

The National Park Service is dedicated to conserving unimpaired the natural and cultural resources, as well as the aesthetic and wilderness values of Denali National Park and Preserve, for the benefit, use, education and inspiration of present and future generations. The Service is also responsible for sustaining a subsistence and frontier lifestyle, and setting a conducive to scientific investigation provided they can be accommodated within the constraints of the mission at large".

The Backcountry Management Plan (BCMP) must take into account the Mission statement listed above, first and foremost, "... CONSERVING UNIMPAIRED the natural and cultural resources..." and "sustaining a subsistence and frontier lifestyle, and setting conducive to scientific investigation PROVIDED they can be accommodated WITHIN the constraints of the mission at large. Meaning that access, use, education, subsistence, frontier lifestyle and research needs to be within the constraints of, "conserving unimpaired", and "aesthetic and wilderness values". The current management and the proposed management plan do not fall within these constraints.

The BENEFIT of this park is that it has the opportunity to provide visitors with a wilderness experience free, or mostly free, from human and modern impacts. But to accomplish this opportunity the Park Service has to **reverse** many of the current trends and impacts.

Many people who come to visit Denali do not know what a wilderness experience truly entails. It is, and should be, far different from the comfort zone provided by most of their modern conveniences. Too many of the current trends appear to be all about modern technologies, luxuries, conveniences, visitor comfort and of course the mighty dollar and not about the quality of the wilderness experience. Each expansion, building, technology, modern amenity is taking away from the quality of the Wilderness and Frontier experience. The wilderness is not about luxuries, conveniences and the mighty dollar.

For visitors not experienced in the outdoors, wilderness or sub arctic, there should be a certain amount of unease, apprehensions, discomfort or even hardship. It should take some planning and effort to visit the wilderness and they should be provided with a full range of wilderness and frontier experiences without modern intrusions. The experience should not be handed to the visitor on a platter or be "canned". The park seems to be going in the direction of that "canned" experience. Don't get your feet wet, don't get off the bus and explore, don't smell the flowers or feel the tundra, just sit back in your seat on a loud diesel bus with dirty windows and see the wilderness pass you by, have everything "fed" to you in a program with as many people as can be crammed into one vehicle with as many vehicles as can be jammed together on one road. The wilderness experience should offer some sense of solitude, remoteness, unease, awe, risk, quiet, tension, beauty, calm, basic, inspirational and not modern, fast paced, technological, intrusive, or overused.

There must be a balance between the wilderness experience, personal comfort, and modern technologies. This has lost some of that wilderness experience and is continually losing more in each incremental change. Incremental changes end up being large major changes when all are added together in the end. There is too much noise, too many people, too much evidence that people have been here before, too many vehicles on the road, too many environmental ethics broken, not enough visitor education, too much building, not enough park service employees, too many disturbances on the wildlife and other resources.

I recommend that you use alternative #2 or the DCC recommendation for the new Backcountry Management Plan (BCMP). Preferred alternative #4 allows too many disturbances, too high of encounter rates, and too high levels of sound disturbances. All of these things are not compatible with Wilderness and the experiences that should be expected and not expected in the wilderness.

The Park and Preserve sections that do not have an official designation should be managed as Wilderness as the default designation requires. The BCMP alternative #4 is not compatible with that designation and therefore should not be chosen.

Old Park 1 in Preferred Alternative #4 should have more area designated as Old Park 2, sensitive areas of Toklat Basin and Upper reaches of the Alaska Range, where standards will result in fewer adverse impacts to the parks resources. Old Park 1 standards are too high of encounter rates and human disturbances for the Wilderness Core of the Park.

Kantishna is a unique issue with a connected but separate future and a separate DCF is recommended where these issues can be addressed. Again, the preferred alternative #4 allows for levels of noise and visitor encounter that are too high.

Management area A (Dunkle Hills) should be eliminated and replaced with Management area B. This area has sensitive caribou habitat, conflicts with subsistence users may occur and management 'A' conflicts with Wilderness values by allowing high levels of man encounters and high levels or sound disturbances.

Government of Alaska
JUL 15 2005
Denali National Park and Preserve

Response to Comments

Turnbull-1

See DCC-36.

Turnbull-2

See DCC-5 and DCC-22.

Comments

Management area A (Climbing Zone) is an unnecessarily large area and should be decreased in size to the size of the "special use area" and the special use area on alternative #4 should also be decreased in size to about 1/6th. Alternative #4 allows for too much scenic landing and too high of levels of sound disturbances.

³ap 2-10 and Map 2-11: All corridors and portals should be removed.

Recreational snow machines are not compatible with wilderness usage. And traditional subsistence use of snow machines needs to be defined and enforced. Snow machines increase the sound levels and impair on wilderness experience. They are not compatible with non-motorized users such as dog sledding, cross country skiing and snow shoeing. Snow machines impair park resources and cause negative impacts on wilderness, flora and fauna and the visitor experience. Recreational snow machining is available on the majority of non-National Park lands in Alaska. Do not allow recreational snow machining to gain a foothold in Denali National Park and Preserve. In the future, it may be the only place to travel undisturbed by loud mechanical vehicles. This also includes helicopters. They are not compatible at all with Wilderness and shouldn't be allowed to start landing in the park.

⁴ Budget: The current budget for the park continues to be cut. There is currently not enough in the budget to hire enough law enforcement and interpretive rangers as well as other staff. Alternative #4 has a large budget. Where are you going to get the funds? There is not enough money now to provide the quality services necessary. Is there money for adequate enforcement in the preferred alternative? Will enforcement of the standards only occur after impairment? We already know that the environment in this park is very fragile and that once impaired it will take years to recover. Prevention of such impairment is expected as preservation is in the core of mission statement.

⁵ Guided Hiking: All guided hiking within the park should be conducted by the park service and not pawned out to the concessionaire or any other private entity. Visitors to this park have very little contact opportunities with Park Service personnel if any at all and Park Service will have more control over the quality of the experience for the visitor than will any private entity. Our National Parks are becoming privatized to an alarming rate and then the focus becomes how much money can we make, how little can we pay our employees, and how hard can we work them, and not the quality of the experience. The Park Service uniform still stands for something much more than any private uniform – quality, knowledge, authority, and protection – that uniform is still looked up to but it is losing it's presence in Denali.

⁶ Discovery Hikes: Discovery hikes are very important and a great educational and experiential opportunity for visitors and should remain a Park Service run program. The disco hikes should remain at 30 participants in total for any given day, but the groups should be smaller to allow for a high quality experience and provide for low impact. There should be 10 people per hike, 3 hikes per day divided into three main sections of the park. One hike between the entrance to Sanctuary, one between Sanctuary to Polychrome, and Polychrome to Etelson, or something of that approximately. This would allow of one hike of each level each day. It would allow for a longer guided hike for those with less time available or who would like to do a hike on a second day visit without going so far into the park. The Front Country Hike could use some of the longer trails like Triple Lakes and Savage and also do some trail less hiking. The Toklat trek, to my knowledge, does not have high participation and maybe should be cancelled and allow that Ranger to lead another Disco Hike.

Denali National Park and Preserve is a unique and special place. It is the most visited Sub-Arctic National Park in the world. It should be managed as a wilderness park with non-motorized opportunities for wilderness experiences that are markedly different from those on surrounding public lands. Protection of natural ecological processes and wildlife should be the number one priority for the BCMP. People be able to expect to not have a high level of human encounters within the wilderness setting of Denali and not to have "combat wildlife sighting" such as at Tek Rest stop on July 10, 2005. Visitors where struggling to get a look at a bear walking down the gravel bar, there were so many people along the railing that they were 4 and 5 deep trying to get a look over the top of each other. There were 6 tour buses, 2 Kanishma buses and 2 VTS buses, there were possibly more than 500 people fighting to see that bear. That does not constitute a wilderness experience.

⁷ Overall vehicle traffic should be decreased but at a minimum bus spacing can be worked out better to avoid such concentration. VTS has it's concentration in the Mornings to allow hikers time to get off and hike and still catch another bus. TWT tours therefore should have their concentration in the afternoons when VTS has less buses on the road. This would even out the distribution of traffic and provide less human encounters for the morning passengers of Tour and VTS providing an increased quality in the experience. Allowing 20 morning TWT tours creates a poor wilderness experience for all the visitors at that time of day whether they are on a Tour bus, Kanishma bus or VTS bus. It degrades the experience for everybody. Also, decreasing VTS buses and increasing Tour buses is doing a disservice for the general public. The National Parks are for the general public, VTS is the public bus system and Tour is marketed for the high end traveler and not affordable to the average person on a family vacation and decreases the access to the park by the general public if the tour bus percentage is allowed to become higher than the VTS system.

⁸ipulate in the plan that you will apply the Old Park definition of traditional activities to the remaining park and preserve. -recreational snow machining is not a traditional activity under ANILCA's special access provisions.

Response to Comments

Turnbull-3

See DCC-4.

Turnbull-4

See DCC-30.

Turnbull-5

The National Park Service recognizes the high value of ranger-led hikes, including Discovery Hikes, and intends for them to continue. Consideration would be given to the concept of offering three Discovery Hikes per day during plan implementation. The modified preferred alternative prioritizes available capacity for organized educational programs or commercial group hiking in the backcountry to be utilized for NPS programs and programs of the Murie Science and Learning Center. However, it is not realistic for the National Park Service to meet all types of demand for guided backcountry activities. Some visitors seek a higher level of expertise or more in-depth learning experiences than can be provided by the NPS seasonal interpretive program. The National Park Service cannot easily accommodate logistically complicated multi-day programs. In terms of implementation priorities for the modified preferred alternative, additional seasonal interpretive staff is difficult to justify compared to monitoring and enforcement staff, given that other entities are able to deliver educational programs.

Turnbull-6

The National Park Service agrees that Discovery Hikes are important. However, this plan provides only general guidance on the type of interpretive programming that is needed and appropriate for the backcountry. The issues raised in this comment would be addressed through future interpretive planning and annual program decisions.

Turnbull-7

Issues related to park road and bus system management were addressed in the 1997 *Entrance Area and Road Corridor Development Concept Plan* and are outside the scope of this BCMP.

Comments

8 The plan should stipulate that NPS will finalize the Wilderness recommendation and designation process. The BCMP should not set indicators and standards at levels that will degrade areas suitable for Wilderness designation and should manage the Park and Preserve sections as Wilderness by default until this process is complete.

9 "Continue the policy of no formal trails in the backcountry. Trails should only be constructed to avoid impairment. All trails should derogo NEPA public process. Prevention of social trails should be of high importance even if that means closing an area to day and/or overnight use until re-vegetation occurs. Rotational closing of backcountry units from year to year to decrease impairment in areas showing impact. Reversing the conditions that have already occurred back to a pristine state. Working agreements and control of guided groups and independents from Kantishna. Education and enforcement of Leave No Trace ethics especially with groups. Be it Kantishna or Shuttle bus riders. In Leave No Trace Outdoor Skills and Ethics - Alaska Tundra by National Outdoor Leadership School, a book commonly found within the Park's bookstores, it states that "Remote or 'pristine' areas typically show little sign of human use". However, Denali although remote is far from "Pristine".

Denali is overused in certain areas and continues to show signs of wear and tear from human use through out the park. The booklet also states to "Travel in small groups, a group of 4-6 people strikes a balance between bear safety and environmental concerns, and if possible, during seasons or days of the week when use levels are low. The less often people use a remote campsite, (or trail), the better chance it has of retaining its pristine qualities. Most campsites, (and trails) can recover completely from a limited amount of use. However, a threshold is eventually reached where the regenerative power of the vegetation cannot keep pace with the amount of trampling and continued use will cause the site to deteriorate rapidly. Allow time for recovery. If they receive no further use, campsites and trails can revert back to their natural state. Even in Alaska the quantity of pristine lands, whether in 100 acre or 100 square mile parcels, is growing smaller everyday. Consequently it is essential that we challenge ourselves and others to preserve these remaining wild places".

10 Be proactive in the protection of natural soundscape, a key wilderness resource. The BCMP should identify those areas of the park where current noise levels exceed standards and provide specific mitigations for these problems. To protect the soundscape, it is important that the NPS limit scenic tour landings and work with aircraft operations to protect Denali's natural sounds from the incessant noise of over flights. Also limit the flyovers in the off season by researchers, especially low flyers that do impact the wildlife. Those wolves are no different than we are. I can work in a noisy environment and still accomplish my goals, but I will work much better without intrusions and excessive noise and so will those wolves. No researcher can convince me that the planes do not bother them, we all know better than that.

11 "The BCMP should change the preferred alternative #4, which will result in increased impairment to the park resources. Specifically, levels of use and the impacts associated with Management areas designated as 'A', Corridors and Portals are incompatible with wilderness suitability. Select an alternative that retains the spirit of Alternative 2, which does the most to protect park resources as outlined in your mission statement.

12 Strengthen the monitoring and enforcement elements of the plan. Data analysis should be conducted more frequently than every five years. Without frequent monitoring, the park cannot be proactive in protecting park resources. The BCMP must stipulate what the Park Service will do if there is inadequate funding for monitoring and enforcement.

The road corridor which currently is not designated backcountry should be managed more conservatively than the current front country designation. This area defaults to backcountry designation in the winter therefore people expect a backcountry experience 8-9 months out of the year. If the road corridor continues front country management it will impair the backcountry experience for both winter and summer visitors. For this road corridor is the primary access for all summer visitors. This is where most people get their backcountry experience from. There should be less tolerance of noise, human encounters, impact, vehicles, and even structures than there is currently. Reverse the current trends along the road corridor to improve on the current wilderness experience.

Restrictions and enforcement of the items that will reverse the impacts already made and continue the preservation of the wilderness and wildlife should take precedence. I often hear, from Park Service, things such as: "We can't tell them this" or "We can't make them do that" but that is just not so. Katmai National Park requires all of their visitors to go directly to Bear Etiquette before they can do anything else. They are not allowed to carry food with them in camp and are not allowed to "eat out with the bears". McNeil River has a permit system. "The permit program was developed after many years of excessive and uncontrolled public use of the area that often put people and bears in danger. The goal of the permit program is to provide the public with an opportunity to view and photograph bears while minimizing their impacts to bears and wildlife habitats. No one has ever been injured by a bear at McNeil River and since the permit program was initiated, no bears have been killed by visitors who felt threatened. To maintain this record, visitor activities at the sanctuary are closely managed and evaluated". Denali is heading directly in the path of a new release headline that may read something like: "First Human Death by Grizzly Bear in Denali's Entire History", if things do not begin to change. The park does not need to tempt fate by having picnic table areas accessible to bears or even allowing eating in the rest stops at all, or by not insisting at every visitor go through bear etiquette and leave no trace etiquette, especially those that drive the road without an employee to rectify their behavior. NPS must insist that all drivers in the park hold up the low impact standards set forth by the Keep the Wildlife Wild campaign. Every visitor should know and understand the Leave No Trace ethics.

Response to Comments

Turnbull-8

See PTP-6.

Turnbull-9

The no-formal-trails policy would be continued throughout the backcountry in the modified preferred alternative. Only a few specific trails would be constructed where vegetation damage is already occurring, including a formalized trail system in the Kantishna Hills. In other areas, the NPS would manage visitor use rather than constructing additional trails to mitigate damage from overuse. The primary tool to address areas that are overused for hiking and camping would be a working group composed of those entities that lead groups into the backcountry or provide access to individuals, as identified under the subsection Cross Country Travel in the Access section. This group would work with the National Park Service to coordinate responses to resource damage using the Decision Guide for Addressing Social Trail Formation (Table 2-12). Closures or additional limits on use are potential tools for addressing trampling damage, as described in this table.

Turnbull-10

Table 4-1 in Chapter 4: Environmental Consequences provides a comparison of noise conditions to standards in places where measurements have been conducted. The modified preferred alternative establishes that research flights would be subject to a number of tests to insure that they are the least disruptive possible. All NPS research flights in the backcountry would be subject to the minimum requirement/minimum tool processes. All research would require a research permit, and the proposed activities must be consistent with the management area standards of the area where the research would occur. These standards now include elements for wildlife population, demographics, and distribution.

Turnbull-11

See NPCA-5 and DCC-30.

Comments

Although access is a part of the mission statement, preservation and protection take top priority, for if you do not maintain the preservation, the true wilderness and the reason for this place will no longer remain and you will have failed in your mission. The process to failure has already begun. The National Park Service has an obligation to the people to set the standards to maintain this wilderness even if that means access is secondary so that there is still wilderness and wildlife left to be experienced for the future generations. If that means limiting access, so be it, it will mean that those who are able to visit Denali will have a once in a lifetime event instead of an overcrowded, noisy, highly impacted, canned, typical tourist experience. Do not give in to the mighty dollar controlled tourist organizations. Denali should remain accessible to the walk-in and the average person. Denali must remain unique, pristine and wild.

- Kim Turnbull *Kim Turnbull* 5 years Park Road Driver
- References P.O. Box 993 Denali Park, AK 99755
- National Outdoor Leadership School. Leave No Trace Outdoor Skills and Ethics - Alaska Tundra. 175 SHARON PARKER Sharon Parker 1 yr photo
- National Park Service <http://www.nps.gov/legacy/mission.html>
- McNeil River <http://www.wildlife.alaska.gov/mcneil/mr-whatns.cfm>
- Nicholas *Nicholas* *Trudisley Weaver* 1 year Park Rd driver
- Mary Ruth Arney* *May 6 Park Rd* 5 years Park Rd driver
- Barr Gray *Barry Gray* 6 years Park road driver
- Susan Adams *Susan Adams* 2 years Interpretation
- Mike D yas *Mike D yas* 15 yrs Denali U.S.
- Bob Tourtelot *Bob Tourtelot* *turtk1skensn.com* 24 yr Tut driver
- iv Frank* *Rita Frank* 2 yr driver
- marco Saeg* *Sharon Saeg* 5 yr cowboy driver
- Scott Johnson *Scott Johnson* 13 year park road driver
- Marsha Anderson *Marsha Anderson* 13 yr park road driver
- Thomas (Austin) McNeil *Thomas McNeil* 18 years Alaskan home stender
- Christina Valvo Hellner *ON Heller* 6 years Am mechanic / land owner
- Wade Hellner *Wade Hellner* visitor 7/14/05
- Scott Hubel* *Scott Hubel* visitor 7/14/05
- Leely Kinney* *Leely Kinney* visitor 7/14/05
- Conner M. Hunt* *Conner M. Hunt* visitor 7/14/05
- Joseph M. Mimitz* *Joseph M. Mimitz* visitor 7/14/05
- Engman Kemp - Colleen Kemp* *Engman Kemp - Colleen Kemp* visitor 7-14-05
- Erinne Parker* *Erinne Parker* visitor 7/14/05
- Zalder R. Schubert* *Zalder R. Schubert* *esthuanum@yahoo.com* 7/14/05
- Sue Kinney* *Sue Kinney* visitor 7/18/05
- Ellen Stevens* *Ellen Stevens* visitor 7/18/05

Response to Comments

Tumbull-12

During the summer months, the park road corridor (150 feet each side and associated material sites and development areas such as the campgrounds and Toklat Road Camp) is outside the scope of the BCMP and is governed under the provisions of the 1997 *Entrance Area and Road Corridor DCP*.

The National Park Service acknowledges that activities within the road corridor do have an impact on the adjacent backcountry. The Adaptive Management section of the modified preferred alternative indicates that monitoring would be done for the “general conditions of the area, not the exceptions.” This caveat exists to recognize that there are boundary effects that are unavoidable wherever a high use area is adjacent to a low use area, as, for example, the noise and encounters with other visitors near the park road. However, the National Park Service is committed to reducing these boundary effects, for example, by continuing to investigate quieter technology for buses operating on the park road and developing road character guidelines to maintain the rustic character of the road. It is hoped that these types of impacts would diminish over time.

Comments

June 23, 2005

To Whom It May Concern:

I have recently returned from an 8-day trip through the backcountry of Denali National Park (areas 12, 13, and 18, climbing Scott, Sunset, and Eielson peaks). The Denali NP backcountry is kept undeveloped and subject to extremely low camping-permit quotas in order to preserve it as true wilderness. Unfortunately, a crucial link in the chain of protection is missing - the protection against aircraft noise.

On a regular day, we would be woken up before 8 AM by aircraft overhead. "Great, it must be a clear day today. I hear airplanes!" is hardly a quote of a wilderness camper. After 8AM, on clear days, very noisy airplanes and helicopters flew overhead at least once an hour, all heading up the spine of the Alaskan Range towards Denali and back. Thus, on this "wilderness" trip, we have seen more airplanes than large mammals for which the park is famous. Only mosquitoes outnumbered planes on our ticklist of wildlife sightings.

The straw that broke my patience's back was an aerial attack straight out of a World War I movie: we were hiking down upper reaches of Thorofare River when a rickety plane dropped out of the sky and dove towards us, veering off at the last minute and repeating the routine several times. The plane was maybe 200 yards off the ground, less than a mile from us. Sure enough, it was chasing some poor grizzly bear for the pleasure of its clients. A truly shocking experience for someone who spent a sleepless night on the steps of the backcountry office trying to be first in line for the coveted backcountry permit...

My suggestion for solving this obvious problem is two-tiered, starting with the best suggestion, and following up with an acceptable compromise. Suggestion 1) Ban airplanes in National Park airspace. Canada does that, so why can't the US? Are our parks less valuable, or are our parks' animals and visitors somehow less susceptible to noise? This suggestion might end up with a few Alaskans and Arizonians out of a job, but I am sure they could find less protected and still-beautiful areas to fly wealthy visitors over.

This suggestion would also immediately solve the crowding problems on Denali's West Buttress Route. Faced with a 2-month arduous backpacking expedition to reach the summit, many of the current peak-baggers would surely choose to boost their self-esteem elsewhere, perhaps even recalling that North America is not a separate continent, so climbing Aconcagua suffices if you are just after the "highest" summits.

Suggestion 2) My suggestion 1) is clearly not tenable in freedom-loving Alaska, so I will start planning more trips to Canada instead of arguing for it further. One compromise that may be acceptable to most parties using Denali NP would be to limit fly-overs to only airspace within earshot of people who have flown in themselves, and hence cannot argue

Response to Comments

Zeithammer-1

The National Park Service does not have the regulatory authority to ban aircraft over the national park. The National Park Service believes some level of air access is appropriate in the Denali backcountry, and the modified preferred alternative defines that level in terms of indicators and standards.

Zeithammer-2

The management area designations in the modified preferred alternative are consistent with this recommendation. Areas to the south of the Alaska Range would allow the most natural sound disturbance, while areas over the Old Park would allow the least. This allocation was made for several reasons, including the greater need of airplane access for climbers and mountaineers to the glaciers on the south side of the Alaska Range and the greater level of airplane traffic necessary to accommodate that access. However, the management area allocation was also determined by the special management history and legal status of the Denali Wilderness. In general, the National Park Service does not agree that those who enter the park by means of airplane should forfeit all claims to enjoy natural soundscapes while visiting Denali. Visitors who hike into the backcountry from the park road also use motorized vehicles to enter the park, but are not expected to tolerate a diesel bus motor in their campsite. The noise associated with airplane access is sometimes necessary, but should always be the minimum possible for all park visitors.

Comments

against airplanes in principle. In particular, limit fly-overs to only the highest and most inaccessible parts of the park, forcing the planes to come in from the South or West, and only fly over western sections of units 23 and 22. No more flying along the crest of the range from Cantwell! Under this suggestion, climbers can get into Kahiltna glacier, sightseers can fly from Talkeetna to see the mountain, and all the backcountry users coming in from the Park Road in the North are spared of the constant wilderness-negating noise.

I hope that the National Park Service implements at least my suggestion 2) if not suggestion 1) as part of the new Backcountry Management Plan currently under consideration.

Thank you

Robert Zeithammer
5807 S Woodlawn Ave
Chicago, IL 60637

Response to Comments

Comments

"Keenan Zerkel" [REDACTED]
07/02/2005 08:27 PM PST
To: dena_bc_plan_comment@nps.gov
cc:
Subject: Comments on Denali Park Plan

Dear Denali Park Managers, 1

I am a lifelong Alaskan resident, very concerned about the future of the Park. I probably enjoy the park than most people. Specifically, I love the raw natural beauty of the area. However, I am also a pilot, and a snowmachine operator. I am concerned because I look at what has happened to access to PUBLIC lands in my state over the past twenty years which can be summarized by a single word...RESTRICTION. I concede that people need a natural, quiet, unspoiled place to hike, reflect, etc. I support maintaining some areas for that purpose. Yet those of us who enjoy snowmachining, flying, hunting, etc should not take a second seat in pursuit of our activities. I have tried to read and understand all the portions of the 5 alternatives (including the 1st "no-action"), but do not have the full picture. (In the future, I think the summary could have been written with more specific deal, but that's a different conversation.) In short, my request to you is that airplane and snowmachine access NOT BE RESTRICTED to the full extent possible.

Aircraft should not be restricted from landing on glaciers. Overflight of the park should not be viewed as spoiling the 'solitude'. Commercial air taxi operators should not be limited to only landing if the guests are spending one night. Snowmachining should continue to be allowed without being restricted to 'traditional' uses. My fear is that in the future, someone will redefine 'traditional use' so that none of us who have grown up with it will be allowed to continue. The current lands available to hunting should be retained. From what I understood in the document, the 4th alternative looks like it best accommodates what I have said above...although not completely. I simply ask you to consider that this is the year 2005 and people no longer treat natural resources like they did (ignorantly) 50 years ago. These days operators of motorized vehicles, and definitely all sportsmen (hunters, fisherman, etc) treat our vanishing wilderness with respect. As Jay Hammond says, "we are good stewards." There are several examples of parks across the nation

accomodating various interests for everyone. The park should implement a plan for access (via trails, motor vehicles, facilities, whatever) for people with limited access. It is not just for people who like to hike. In the end, we all have to give a little for the best interest of the park. I accept that the rules under which I enjoy the forms of access I use for the park will change, probably more restrictive, better defined and (hopefully) strictly enforced. Please respect our desire as good stewards to enjoy denali with airplanes and snowmachines in a responsible manner. Thank you for your time, and your efforts to protect this wonderful shared resource. Please let me know if there is any other information I can provide to help aid in your decisions. Sincerely,

Keenan Zerkel
12515 Rya Rd
Anchorage, Alaska
99516

2

Response to Comments

Zerkel-1

The National Park Service believes that restrictions are sometimes necessary to protect park resources and manage conflicts between users. However, the modified preferred alternative commits to using the least restrictive measures necessary to achieve the standards set for each management area.

Zerkel-2

With the *Entrance Area and Road Corridor DCP*, the *South Side Denali DCP*, and the BCMP, the National Park Service has outlined a comprehensive strategy for providing access and visitor services at Denali, including provisions for those visitors who are not necessarily interested in or able to hike or otherwise make cross country expeditions. The National Park Service believes that between these three plans, all visitors interested in gaining access to the park to learn about and experience park resources would have opportunities to do so. In the backcountry, opportunities for visitors of all abilities and interests include short trails, educational and commercial guided activities, and scenic air tour landings.

Appendices

Appendices A, B, and D-H are unchanged from the *Revised Draft EIS* and are incorporated here by reference. Additions and changes to the Bibliography are presented below as an Errata sheet. Appendix C: ANILCA Section 810(a) Summary of Evaluations and Findings is updated to reflect the modifications in the preferred alternative and is provided in its entirety.

BIBLIOGRAPHY

ERRATA

- Belnap, J. 1998. Environmental Auditing – Choosing Indicators of Natural Resource Condition: A Case Study in Arches National Park, UT. *Environmental Management*, Vol. 22, No. 4. pp. 635-642.
- Bishop, Richard H., 1978. Subsistence Resource Use in the Proposed North Addition to Mt. McKinley National Park. *Anthropology and Historic Preservation*, Cooperative Park Studies Unit, Occasional Paper No. 17. University of Alaska Fairbanks.
- Cole, D. et al. 1999. Workshop on Application of Visitor Carrying Capacity Frameworks to Management and Protection of Non-Renewable Resources. Sept. 14-15, 1999.
- Haynes, Terry L., William Simeone, and David B. Andersen. Denali National Park and Preserve: Ethnographic Overview and Assessment. Fairbanks, AK: Alaska Department of Fish and Game, Division of Subsistence, 2001.
- Mech, L. D. and S. M. Goyal. 1993. Canine parvovirus effect on wolf population change and pup survival. *J. Wildl. Dis.* 29(2):330-333.
- Reid, R. S. and Schreiner, E. S. Long-term experimental trampling on plant communities in Denali National Park, Alaska. 1985. Port Angeles, WA, Unpublished. Olympic National Park, Science and Technology Div.
- Siegel, Colonel Jerry I. Personal communication. Comment received on Revised Draft Backcountry Management Plan received June 28, 2005.

APPENDIX C: ANILCA SECTION 810(A) SUMMARY OF EVALUATIONS AND FINDINGS

I. Introduction

This evaluation and finding was prepared to comply with Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA). It evaluates the potential restrictions to subsistence activities that could result from implementation of the backcountry management plan for Denali National Park and Preserve. The *Revised Draft Backcountry Management Plan and Environmental Impact Statement* describes a range of alternatives for consideration.

II. The Evaluation Process

Section 810(a) of ANILCA states:

"In determining whether to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands . . . the head of the Federal agency . . . over such lands . . . shall evaluate the effect of such use, occupancy, or disposition on subsistence uses and needs, the availability of other lands for the purposes sought to be achieved, and other alternatives which would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes. No such withdrawal, reservation, lease, permit, or other use, occupancy or disposition of such lands which would significantly restrict subsistence uses shall be effected until the head of such Federal agency:

1. gives notice to the appropriate State agency and the appropriate local committees and regional councils established pursuant to Section 805;
2. gives notice of, and holds, a hearing in the vicinity of the area involved; and
3. determines that (A) such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands, (B) the proposed activity would involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other disposition, and (C) reasonable steps would be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions."

ANILCA created new units and additions to existing units of the national park system in Alaska. Denali National Park and Preserve additions were created by ANILCA Section 202(3)(a) for the purposes of:

"The park additions and preserve shall be managed for the following purposes, among others: To protect and interpret the entire mountain massif, and additional scenic mountain peaks and formations; and to protect habitat for, and populations of fish and wildlife, including but not limited to, brown/grizzly bears, moose, caribou, Dall sheep, wolves, swans and other waterfowl; and to provide continued opportunities including

reasonable access, for mountain climbing, mountaineering, and other wilderness recreational activities."

Subsistence is an allowed use in the ANILCA additions to Denali National Park and Preserve (Sec. 202(3)(a)). The potential for significant restriction must be evaluated for the proposed action's effect upon " . . . subsistence uses and needs, the availability of other lands for the purposes sought to be achieved and other alternatives which would reduce or eliminate the use." (Sec. 810(a))

III. Proposed Action on Federal Lands

The "Description of Alternatives" section of the *Revised Draft* and the *Final Backcountry Management Plan and Environmental Impact Statement* describes in detail the alternatives for consideration. Following is a brief summary of each.

Alternative 1: No Action

The National Park Service would continue the present management direction, guided by the 1986 *General Management Plan*, the 1997 *Entrance Area and Road Corridor Development Concept Plan*, the 1997 *South Side Denali Development Concept Plan*, the 1997 *Strategic Plan*, and backcountry management plans from 1976 and 1982.

Recreational use and access patterns would continue to develop, and the agency would respond as necessary on a case-by-case basis. No new services or facilities would be developed to meet increased levels of use in the backcountry, except for those identified in the entrance area or south side plans.

There would be no new management areas defined for the backcountry of Denali National Park and Preserve. The entire backcountry would continue to be defined as a "Natural Area" under the 1986 General Management Plan. The only distinctions between areas of the backcountry would be the legislative distinctions of the designated Wilderness in the former Mount McKinley National Park, the 1980 national park additions, and the national preserves. There would be no resource or social standards defined for any portion of the backcountry.

Alternative 2

This alternative would distinguish a unique Denali experience based on dispersed use in a wilderness landscape with few sights or sounds of people or mechanized civilization.

There would be few services, facilities, or signs of management presence. This alternative would most clearly distinguish the backcountry experience in Denali from the surrounding public lands, providing a place primarily for visitors who are very self-reliant, and including many opportunities for extended expeditions in very remote locations. Backcountry users seeking other experiences would find those opportunities on neighboring lands.

Alternative 3

This alternative would provide a variety of appropriate wilderness recreational activities by establishing areas to serve those visitors who want to experience the wilderness resource values of the Denali backcountry but require services, assistance, or short time-commitments. The areas would be the minimum necessary to provide these experiences based on present demand and would be focused along the park road, in Kantishna near the park road, and around the Ruth Glacier (along with existing mountaineering activity on the Kahiltna Glacier). The majority of the backcountry would be managed for dispersed, self-reliant travel and would include opportunities for extended expeditions in very remote locations. Growth in other uses would be accommodated on neighboring lands.

Alternative 4 – Modified (NPS Preferred)

This backcountry management plan would guide the National Park Service in providing opportunities for a variety of wilderness recreational activities and experiences while recognizing and protecting the premier wilderness resource values of the entire backcountry. Areas in the Dunkle Hills and around the Ruth and Tokositna Glaciers on the south side of the Alaska Range would be managed for those visitors who want to experience the wilderness resource values or other resource values of the Denali backcountry but require services or assistance, or who are unable to make a lengthy time commitment. Areas along the park road in the Old Park and the Kantishna Hills would provide accessible opportunities for short- or long-duration wilderness recreational activities with only limited options for guidance or assistance the farther one gets from the park road. The remainder of the backcountry would be managed for dispersed, self-reliant travel, and would include opportunities for extended expeditions in very remote locations.

Alternative 5

This alternative would create two distinct geographic areas that provide different kinds of visitor experiences in the Denali backcountry. The old Mount McKinley National Park and the Denali additions north of the Alaska Range would be primarily managed for dispersed, self-reliant travel although no areas would be managed specifically to preserve opportunities for extended expeditions in remote locations. Areas along the park road and in Kantishna that presently receive a relatively high volume of use and large parts of the additions south of the Alaska Range would be managed for a greater intensity and variety of appropriate recreational activities and would have more visible management presence and opportunities for more services and facilities.

IV. Affected Environment

Introduction

The backcountry of Denali National Park and Preserve includes the entire park except the development sub-zones delineated in the 1997 *Entrance Area and Road Corridor Development Concept Plan*. For some topics the backcountry management plan includes

uses even in the development sub-zones, but proposed actions are consistent with the *Entrance Area and Road Corridor Development Concept Plan* and the *South Side Denali Development Concept Plan*. The study area includes designated, proposed, potential, recommended, and suitable wilderness, but the plan does not make recommendations for federally-designated Wilderness.

Park Environment

Denali National Park and Preserve is located in the interior of Alaska and is dominated by an east to west line of towering, glaciated mountains known as the Alaska Range. The range rises abruptly from lowlands of 500 to 2,000 feet in elevation to the pinnacle of Mount McKinley, North America's highest mountain, at 20,320 feet. The range is perpetually snowclad above approximately 7,500 feet on the north and 6,000 feet on the south. Glaciers are numerous and tend to be larger and longer on the south side of the range than on the north.

Moisture from the Gulf of Alaska is blocked by the Alaska Range, causing a continental climate to the north of the range and more of a maritime climate to the south. Moisture-laden air from the south results in greater levels of precipitation on the southern flanks of the range. The average annual precipitation at park headquarters is 15 inches, while at some higher elevations in the park the total precipitation exceeds 80 inches and snowfall exceeds 400 inches. Normal snowpack throughout the region averages between 20 and 40 inches.

Vegetative cover in Denali is typical of interior Alaska taiga. Lowland floodplains are dominated by dense, deciduous or coniferous forest, or by a mixed forest of balsam poplar and white spruce. Upland forests tend to be more open with mixed or continuous stands of black spruce, white spruce, or aspen. Upland forests give way to shrub communities at elevations above approximately 2,400 feet. Glacial rivers flowing from the Alaska Range create broad floodplains that are sparsely vegetated. Tall shrub communities of willow and alder grow on moist slopes and along drainages, and low shrub communities of dwarf birch and willow grow at higher elevations or on dry slopes. Alpine tundra, composed of dryas and dwarf willow shrub, mat and cushion species, or grass and sedge mixes, grows on slopes and ridges to about 6,000 feet. More than 650 species of flowering plants inhabit the slopes and valleys of the park.

The original Mount McKinley National Park was established in 1917 primarily as a refuge for large mammals. In 1980, ANILCA enlarged the Old Park to more than 6 million acres and re-designated the area as Denali National Park and Preserve. The protected subarctic ecosystem of Denali provides habitat for 30 species of mammals, at least 152 species of breeding birds, 16 species of fish (twelve resident species and four anadromous Pacific salmon species), and 1 amphibian. The American peregrine falcon (*Falco peregrinus anatum*), the subspecies that nests in the Denali region, was formerly listed as an endangered species under the Endangered Species Act but was delisted as of August 25, 1999 (64 FR 46542). No federally designated threatened or endangered species are known to occur within Denali National Park and Preserve (see appendix E of the original draft plan, consultation letter from the U.S. Fish and Wildlife Service, NPS 2003d).

About 100 archeological sites are recorded within Denali National Park and Preserve. Archeological investigations conducted within and immediately adjacent to the park strongly suggest that sites dating from the Paleoarctic tradition (10,000 years before present) through the Protohistoric period (200 years before present) exist within the park. Excavations at the Dry Creek site, situated near the northeastern boundary of the park, have yielded one of Alaska's earliest dates, 11,000 years before present (BP). The Carlo Creek site, situated along the Nenana River on the eastern boundary of the park, is dated at approximately 8,000 BP. These sites may depict tool technologies and subsistence patterns representing the earliest peopling of North America by means of the Bering Land Bridge.

The Denali area was used historically by several Athabaskan Indian groups. The Ahtna people of Cantwell arrived from the east, the Tanana people came into the area from the north traveling up the Nenana and Toklat Rivers, and the Koyukon people who lived at Lake Minchumina ascended the McKinley, Foraker, and Herron Rivers. The Upper Kuskokwim people who still live in Nikolai and Telida approached the park from the west, and the Dena'ina people approached the park from the south. Subsistence activities included large mammal hunting, fishing, and small game trapping.

A more comprehensive description of existing conditions can be found in the affected environment section of the *Revised Draft Backcountry Management Plan and Environmental Impact Statement*.

V. Subsistence Uses and Needs Evaluation

Background Information

The 1980 additions to Denali National Park and Preserve are open to subsistence uses in accordance with Section 202(3)(a) of ANILCA. Lands within the former Mount McKinley National Park are closed to subsistence activities. Congress found and declared in Title VIII, Subsistence Management and Use, Section 801(3), that the continuation of the opportunity for subsistence uses of resources on public and other lands in Alaska is threatened by the increasing population of Alaska, with resultant pressure on subsistence

resources, by sudden decline in the populations of some wildlife species which are crucial subsistence resources, by increased accessibility of remote areas containing subsistence resources, and by the taking of fish and wildlife in a manner inconsistent with recognized principles of fish and wildlife management.

Furthermore, Congress declared it to be the policy in Section 802(1), that consistent with sound management principles and the conservation of healthy populations of fish and wildlife, the utilization of the public lands in Alaska is to cause the least adverse impact possible on rural residents who depend upon subsistence uses of resources of such lands; consistent with management of fish and wildlife in accordance with recognized scientific principles and the purposes for each unit established, designated, or expanded by Title II; it is the purpose of Title VIII to provide the opportunity for rural residents engaged in a subsistence way of life to do so.

Denali National Park and Preserve has a total of about 380 eligible local rural residents who qualify for subsistence use of park and preserve resources. Denali's subsistence users primarily reside in the communities of Cantwell, Minchumina, Nikolai, and Telida. Other local rural residents who do not live in these designated resident zone communities, but who have customarily and traditionally engaged in subsistence activities within the park, may continue to do so pursuant to a subsistence permit issued by the park superintendent. There are about 12 individuals from McKinley Village, Nenana, Healy, Tanana, and the community of Colorado south of Cantwell that have received subsistence use permits. Each year, between one and seven people engage in subsistence activities in the Kantishna area and about 50 households in Cantwell acquire moose permits.

Denali has two areas designated as National Preserves. Both federal subsistence and State of Alaska hunting and trapping are permitted in the national preserves. State harvests are regulated by State game laws passed by the Alaska Board of Game. Federal subsistence harvest is regulated by federal regulations passed by the Federal Subsistence Board.

ANILCA provides a preference for local rural residents over other consumptive users should a shortage of subsistence resources occur and allocation of harvest becomes necessary. This is particularly important for national preserves where state hunting and trapping is allowed. When the harvest must be limited, state hunting opportunities must be restricted first before any reduction in the harvest for federal subsistence users occurs.

Areas receiving the most extensive subsistence use activities are the northwestern park and preserve region near Lake Minchumina, and the southeastern park region near Cantwell, and the southern Kantishna Hills region near Kantishna. Cantwell area subsistence users primarily use park lands in the Windy Creek, lower Cantwell Creek, and Bull River drainages. In more recent years the Kantishna Hills region has seen increased utilization for subsistence resources. In the northwestern region, there is a long history of established traplines that extend throughout the ANILCA park and preserve additions up to the boundaries of the former Mt. McKinley National Park. Denali National Park and Preserve lands are responsible for only a portion of the estimated

community subsistence harvests reported by these communities since a significant portion of the areas used by these communities for subsistence are beyond the park and preserve boundaries

Overall, Denali's main subsistence species are moose, caribou, salmon, hare, rock and willow ptarmigan, spruce grouse, ducks and geese, and a few species of freshwater fish. Less frequently used large mammals include black bear, brown bear and Dall sheep. Fresh water fish include burbot, dolly varden, grayling, lake trout, northern pike, rainbow trout and whitefish. Important fur animals include marten, mink, red fox, wolf, lynx, weasel, wolverine, land otter, beaver, muskrat, and coyote.

The National Park Service recognizes that patterns of subsistence use vary from time to time and from place to place depending on the availability of wildlife and other renewable natural resources. A subsistence harvest in a given year may vary considerably from previous years because of such factors as weather, surface snow conditions for traveling, wildlife migration patterns, natural population cycles, and wildlife conservation practices of leaving a trapline fallow periodically.

Potential Impacts to Subsistence Users

Increases in types and levels of recreation have the potential to interfere with subsistence activities. As popular places become crowded, it is expected that recreational use will disperse into more remote or infrequently-used places. Potential restrictions to subsistence may occur if visitors frequent areas used for subsistence. Visitors, especially those who travel via motorized means, may disturb wildlife and interfere with subsistence users who are hunting or scouting for subsistence resources.

In the last five years, non-subsistence snowmachine use has expanded dramatically in and adjacent to the southeastern areas of the park, particularly in the area near Cantwell and Broad Pass. Along with increasing popularity for snowmobiling have come dramatic improvements in snowmachine technology. Because of the increased reliability, power and flotation ability of the newer snowmachines, snowmachiners have been accessing more distant areas and operating in significantly steeper and higher terrain than in past years.

Open habitat, mountain slopes, and reasonably good snow deposition in the Broad Pass area have attracted increasing numbers of snowmachiners from areas of the state accessible to the Parks Highway. Typically, non-subsistence snowmachine groups tend to travel in larger numbers and spend more time traveling in basins and drainages.

As the range of non-subsistence snowmachiners overlaps with subsistence use areas, the potential for conflict between these user groups increases. Snowmachine users can interfere with subsistence traplines, displace furbearers, and create paths that encourage animals to travel farther from places where subsistence activities typically occur. For several years, subsistence users have expressed concerns about the impacts and conflicts of increasing recreational use and increasing non-subsistence snowmachine use on

subsistence resources and subsistence activities. Members of Denali's Subsistence Resource Commission have specifically expressed concerns regarding the effects of increasing levels of snowmachine use in the Broad Pass/Cantwell area upon moose, furbearers, and ptarmigan populations and their distributions (Denali Subsistence Resource Commission Meeting Minutes, April 30, 2001; April 29, 1996; August 9, 1996; and June 28, 1993). Concerns about the impacts of increasing non-subsistence uses were also mentioned by Lake Minchumina area residents during public scoping (see also Letter from Collins, 3/3/01).

The Denali Subsistence Resource Commission Meeting Minutes (June 1993) document high levels of non-subsistence related snowmachine use in the Cantwell area. It was noted that riders were primarily using drainages and basins, essentially saturating the area and displacing furbearers, causing local trappers to pull their traps prematurely in December of that year.

In the Preserves, sport hunting can also interfere with subsistence as subsistence users would have to compete with sport hunters for game.

Evaluation Criteria

To determine the potential impacts of the alternatives on existing subsistence activities, three evaluation criteria were analyzed relative to existing subsistence resources:

1. The potential to reduce important subsistence fish and wildlife populations by (a) reductions in number, (b) redistribution of subsistence resources, or (c) habitat losses;
2. What effect the action might have on subsistence fisher or hunter access;
3. The potential for the action to increase fisher or hunter competition for subsistence resources.

1. The potential to reduce populations

(a) Reduction in Numbers:

Alternatives 1-3

Actions in these alternatives are not expected to reduce numbers of wildlife.

Alternative 4 - Modified (NPS Preferred Alternative)

Expanding the hunting guide area in the southwest preserve has the potential to reduce wildlife populations as animals in this area could be shot; however, geographic and temporal limitations would prevent a significant restriction to subsistence resources.

Alternative 5

Expanding the hunting guide area in the southwest and northwest preserves has the potential to reduce wildlife populations as animals in these areas could be shot; however,

geographic and temporal limitations would prevent a significant restriction to subsistence resources.

(b) Redistribution of Resources:

Alternative 1 (no action)

Continuing current management direction under alternative 1 would result in rapidly increasing recreational use in parts of Denali National Park and Preserve, including in important subsistence use areas. The main impact from non-subsistence activities, such as snowmachine use and motorboat use, would be redistribution of wildlife resources available to subsistence users and competition for resources. This impact could be expected to increase over time as visitor use increases. There are no provisions in current management plans to allocate between recreational and subsistence uses, so increased user conflicts could be expected at some locations.

Increases in recreational activities in subsistence use areas have the potential to redistribute wildlife populations. Use levels among a variety of activities are expected to increase, especially near access points and at destinations that are already popular. Visitors engaged in recreational activities have the potential to harass or frighten wildlife. In addition to the mere presence of people, human-generated noise, and noise from machines, such as airplanes and snowmachines, could cause wildlife to move away from visitors. As popular areas become crowded, visitor use is expected to disperse to other areas of the park, which could force wildlife to vacate those areas.

For example, wildlife may be displaced by snowmachines in the Broad Pass area south of Cantwell, along the Stampede corridor, in the southwest preserve, and in the Tokositna and Lower Ruth areas, and may expend valuable energy fleeing from them. Potential adverse impacts on wildlife most likely would occur during mid-to-late winter, when wildlife is likely to be in a nutritionally-stressed condition. Some dispersion is also possible in the northwest preserve as wildlife could be frightened by non-subsistence motorboat and snowmachine use. This scenario would be likely in alternative 1 where park staff would have little ability to educate visitors about wildlife before visitors go into the backcountry.

Subsistence users in the Cantwell area have expressed concern about increasing snowmachine use in the Broad Pass area, as noted above. Subsistence users in the northwest preserve and adjacent park additions have also expressed concerns about motorized use. Additional non-subsistence use involving snowmachines and motorboats in subsistence use areas, such as along Birch Creek, could result in displacement of furbearers and moose, cabin vandalism and unauthorized use, disturbed traps, and conflicts between recreational and subsistence users (letters from Miki and Julie Collins, 7/16/00, 7/24/00 and 3/3/01). Introducing new or expanded recreational uses into these areas increases the potential for conflict between consumptive and non-consumptive users. Subsistence trappers may be adversely affected during certain times of the year by displacement of furbearers, and subsistence hunters may be adversely affected during

winter hunting seasons by the temporary displacement of wildlife, particularly moose and caribou.

Because of concerns about the declining number of ptarmigan in Wildlife Management Unit 13, which encompasses the east side of the south additions and important subsistence use areas south of Cantwell, hunting bag limits have been reduced and the season shortened to close on March 31. One of the reasons for shortening the season from April 30 to March 31 was to avoid hunting and activity during the nesting period in April. Increased recreation, particularly snowmachine use, could have a negative effect by causing displacement of ptarmigan populations during their sensitive breeding and nesting period (Denali Subsistence Resource Commission Meeting Minutes, August 9, 1996 and June 28, 1993).

For several years, subsistence users have expressed concerns about the impacts and conflicts of increasing recreational use and increasing non-subsistence snowmachine use on subsistence resources and subsistence activities. Members of Denali's Subsistence Resource Commission have specifically expressed concerns regarding the effects of increasing levels of snowmachine use in the Broad Pass/Cantwell area upon moose, furbearers, and ptarmigan populations and their distributions (Denali Subsistence Resource Commission Meeting Minutes, April 30, 2001; April 29, 1996; August 9, 1996; and June 28, 1993). The Denali Subsistence Resource Commission Meeting Minutes (June 1993) document high levels of non-subsistence related snowmachine use in the Cantwell area. It was noted that riders were primarily using drainages and basins, essentially saturating the area and displacing furbearers, causing local trappers to pull their traps prematurely in December of that year. As the range of non-subsistence snowmachine use overlaps with subsistence use areas, the potential for conflict between these user groups increases.

Non-subsistence snowmachine users would interfere with subsistence traplines, displace furbearers, and create paths that encourage animals to travel farther from places where subsistence activities typically occur. Trappers would continue to pull their traps by December because it would be inefficient to set traps in an area in which furbearers have been displaced.

Increased use of the park, particularly non-subsistence snowmachine use, would likely displace moose and caribou from critical wintering areas on park lands in the Windy and Cantwell Creek drainages. Local moose populations and the Cantwell group of the Nelchina Caribou herd use areas within the former Mount McKinley National Park and the ANILCA park additions of Windy Creek, Cantwell Creek, and the Bull River drainages during winter. These areas along the Alaska Range in the vicinity of Windy Pass provide important winter habitat for moose and caribou because snow depths associated with the pass area are less than in other areas.

Non-subsistence snowmachine use is often concentrated in these high-elevation basins where riders spend many hours at a time. These basins provide critical winter habitat for moose and caribou. Moose and caribou would continue to be displaced from these critical

wintering areas as non-subsistence snowmachine use increases. This could significantly increase the stress and nutritional demands upon moose and caribou and result in some moose or caribou mortality, depending on the environmental conditions and the body reserves of moose or caribou in a given year.

Non-subsistence snowmachine use originating in Cantwell begins when adequate snowcover is present, and during early winter, use is relatively low. As snowpack increases so does snowmachine use. In late winter when the days are lighter, warmer, and there's lots of snow, non-subsistence snowmachine use is highest. This corresponds with the time of the year when moose and caribou are at their lowest nutritional states. Non-subsistence snowmachine use would continue to induce stress on moose and caribou in the Windy and Cantwell drainages, especially in late winter when the animals are in a nutritional deficit. The magnitude of the impact would depend on snow depth. Die off would be greater as snow depth increases because displaced animals would have a more difficult time moving through the snow to forage and to get away from snowmachine use.

Due to the potential for high levels of widespread recreation that could create unfavorable conditions for wildlife (i.e. presence and noise from visitors would scare wildlife), alternative 1 would have major impacts on distribution of subsistence resources.

Alternative 2

Redistribution of wildlife populations is not expected under alternative 2 because of the emphasis on protecting wildlife habitat and highly dispersed recreation. Snowmachine use in the park additions and preserve would be limited to traditional activities as defined for the Old Park, which would result in an immediate decrease in the non-subsistence snowmachine use mentioned under alternative 1. The impacts described under alternative 1 would therefore not occur. Subsistence opportunities would likely improve as compared to current conditions because visitor use, particularly non-subsistence snowmachine use, would be reduced, so wildlife would be less likely to be frightened and move elsewhere. Alternative 2 would have the least overall impacts to subsistence resources and opportunities.

Alternative 3

Alternative 3 provides for dispersed recreational uses, including some motorized access, in parts of the park additions and preserve that are used for subsistence. Because non-subsistence uses would be managed for low encounter rates and minimal impacts to natural resources in most of the park additions and preserve, only minimal redistribution of populations would occur.

Snowmachine use would be limited to subsistence and traditional activities as defined for the Old Park in the park and preserve additions, and to established winter corridors for recreational use. Therefore, there would be an immediate decrease in non-subsistence snowmachine use throughout the park and preserve, but the winter corridors would result in areas of more concentrated snowmachine use.

Establishing corridors would channel snowmachine use in the Broad Pass area; to the toes of the Ruth, Tokositna, and Kanikula glaciers from the Tokositna River; and along the Yentna, Tokositna, and Kantishna/Muddy Rivers (135 linear miles of winter corridors). Trapping occurred west of Cantwell Creek in the 1990's, but it does not generally occur there presently, so high use snowmachine corridors designated under this alternative in the Broad Pass area would not conflict with areas around Cantwell that are currently used for subsistence activities. Along most of the other corridors, these higher use areas overlap with areas currently or traditionally used for subsistence activities. Encounters with wildlife along these corridors could cause behavioral disturbance, increase stress levels, and temporarily displace wildlife.

Minor impacts that would result would be attributable to snowmachine use, airplane access, and other increasing recreational uses that could scare wildlife and cause them to relocate.

Alternative 4 - Modified (NPS Preferred Alternative)

Under this alternative, access by snowmachine to the park and preserve additions would continue to grow. If demand is sufficient, Corridors could be designated to provide winter access along Cantwell Creek, Bull River, West Fork Chulitna, and the Tokositna River. In a future wilderness proposal, accommodation would be made as necessary for recreational snowmachine access along these Corridors (19.5 miles). Winter corridors would result in areas of concentrated snowmachine use. Areas designated as Management Area A would also allow for an encounter rate of up to five parties per day, including two parties larger than six people. All but the Tokositna River corridor overlap with areas currently or traditionally used for subsistence activities. Other than the Corridors, subsistence use areas in Kantishna and the Broad Pass area would be designated Management Area B and areas in the northwestern portion of the park would be designated Management Area D, allowing only moderate or low levels of visitor impacts respectively. However, non-subsistence snowmachine use could still occur in these areas and use levels could grow, particularly in accessible areas such as Broad Pass during times when there is presently little use.

For several years, subsistence users have expressed concerns about the impacts and conflicts of increasing recreational use and increasing non-subsistence snowmachine use on subsistence resources and subsistence activities. Members of Denali's Subsistence Resource Commission have specifically expressed concerns regarding the effects of increasing levels of snowmachine use in the Broad Pass/Cantwell area upon moose, furbearers, and ptarmigan populations and their distributions (Denali Subsistence Resource Commission Meeting Minutes, April 30, 2001; April 29, 1996; August 9, 1996; and June 28, 1993). The Denali Subsistence Resource Commission Meeting Minutes (June 1993) document high levels of non-subsistence related snowmachine use in the Cantwell area. It was noted that riders were primarily using drainages and basins, essentially saturating the area and displacing furbearers, causing local trappers to pull their traps prematurely in December of that year. As the range of non-subsistence snowmachine use overlaps with subsistence use areas, the potential for conflict between these user groups increases.

Non-subsistence snowmachine users would interfere with subsistence traplines, displace furbearers, and create paths that encourage animals to travel farther from places where subsistence activities typically occur. Trappers would continue to pull their traps by December because it would be inefficient to set traps in an area in which furbearers have been displaced.

Increased use of the park, particularly non-subsistence snowmachine use, would likely displace moose and caribou from critical wintering areas on park lands in the Cantwell Creek drainage. Local moose populations and the Cantwell group of the Nelchina Caribou herd use areas within the former Mount McKinley National Park and the ANILCA park additions of Windy Creek, Cantwell Creek, and the Bull River drainages during winter. These areas along the Alaska Range in the vicinity of Windy Pass provide important winter habitat for moose and caribou because snow depths associated with the pass area are less than in other areas.

Wildlife may be displaced by snowmachines in the Broad Pass area south of Cantwell, along the Stampede corridor, in the southwest preserve, and in the Tokositna and Lower Ruth areas, and may expend valuable energy fleeing from them. Potential adverse impacts on wildlife most likely would occur during mid-to-late winter, when wildlife is likely to be in a nutritionally-stressed condition. Some dispersion is also possible in the northwest preserve as wildlife could be frightened by non-subsistence motorboat and snowmachine use.

Subsistence users in the northwest preserve and adjacent park additions have also expressed concerns about motorized use. Additional non-subsistence use involving snowmachines and motorboats in subsistence use areas, such as along Birch Creek, could result in displacement of furbearers and moose, cabin vandalism and unauthorized use, disturbed traps, and conflicts between recreational and subsistence users (letters from Miki and Julie Collins, 7/16/00, 7/24/00 and 3/3/01). Introducing new or expanded recreational uses into these areas increases the potential for conflict between consumptive and non-consumptive users. Subsistence trappers may be adversely affected during certain times of the year by displacement of furbearers, and subsistence hunters may be adversely affected during winter hunting seasons by the temporary displacement of wildlife, particularly moose and caribou.

Because of concerns about the declining number of ptarmigan in Wildlife Management Unit 13, which encompasses the east side of the south additions and important subsistence use areas south of Cantwell, hunting bag limits have been reduced and the season shortened to close on March 31. One of the reasons for shortening the season from April 30 to March 31 was to avoid hunting and activity during the nesting period in April. Increased recreation, particularly snowmachine use, could have a negative effect by causing displacement of ptarmigan populations during their sensitive breeding and nesting period (Denali Subsistence Resource Commission Meeting Minutes, August 9, 1996 and June 28, 1993).

Redistribution of wildlife could also occur as a result of expanding the hunting guide area in the southwest preserve. Human presence, aircraft used to access the area, and gunshots may frighten wildlife, causing animals to relocate.

Due to the potential for high levels of widespread recreation and increases in non-subsistence snowmachine use that could create unfavorable conditions for subsistence wildlife populations, this alternative would have minor to moderate impacts on subsistence resources and opportunities.

Alternative 5

There would be considerable potential for redistribution of resources under alternative 5 because of continued increases in non-subsistence activities in important subsistence use areas. Redistribution of wildlife populations would result from greater levels of motorized use, including snowmachine use, motorboats, and airplane landings.

Access by snowmachine to the park additions and preserves would continue and grow. Designating corridors for winter use would focus snowmachine use in the following places: from the southern park boundary to the Old Park boundary near the West Fork Chulitna, Bull River, and Cantwell Creek; to the toes of the Ruth, Tokositna, and Kanikula glaciers from the Tokositna River; to Kantishna from the Sushana River; along the Yentna, Tokositna, and Kantishna/Muddy Rivers. In a future wilderness proposal, accommodation would be made as necessary for recreational snowmachine access along corridors and throughout those areas designated as Management Area A (18% of the total park area plus 183 linear miles of corridors). Winter corridors would result in areas of more concentrated snowmachine use and areas designated as management area A would allow for an encounter rate of up to five parties per day, including two parties of larger than six people. Nearly all of the winter corridors overlap with areas currently or traditionally used for subsistence activities. Increases in snowmachine use would likely frighten animals and cause them to relocate. Potential adverse impacts on wildlife most likely would occur during mid-to-late winter, when wildlife is likely to be in a nutritionally-stressed condition.

Redistribution of wildlife could also occur as a result of expanding the hunting guide areas in the southwest and northwest preserves. Human presence, aircraft used to access the area, and gunshots may frighten wildlife, causing animals to relocate.

For several years, subsistence users have expressed concerns about the impacts and conflicts of increasing recreational use and increasing non-subsistence snowmachine use on subsistence resources and subsistence activities. Members of Denali's Subsistence Resource Commission have specifically expressed concerns regarding the effects of increasing levels of snowmachine use in the Broad Pass/Cantwell area upon moose, furbearers, and ptarmigan populations and their distributions (Denali Subsistence Resource Commission Meeting Minutes, April 30, 2001; April 29, 1996; August 9, 1996; and June 28, 1993). The Denali Subsistence Resource Commission Meeting Minutes (June 1993) document high levels of non-subsistence related snowmachine use in the Cantwell area. It was noted that riders were primarily using drainages and basins,

essentially saturating the area and displacing furbearers, causing local trappers to pull their traps prematurely in December of that year. As the range of non-subsistence snowmachine use overlaps with subsistence use areas, the potential for conflict between these user groups increases.

Non-subsistence snowmachine users would interfere with subsistence traplines, displace furbearers, and create paths that encourage animals to travel farther from places where subsistence activities typically occur. Trappers would continue to pull their traps by December because it would be inefficient to set traps in an area in which furbearers have been displaced.

Increased use of the park, particularly non-subsistence snowmachine use, would likely displace moose and caribou from critical wintering areas on park lands in the Windy and Cantwell Creek drainages. Local moose populations and the Cantwell group of the Nelchina Caribou herd use areas within the former Mount McKinley National Park and the ANILCA park additions of Windy Creek, Cantwell Creek, and the Bull River drainages during winter. These areas along the Alaska Range in the vicinity of Windy Pass provide important winter habitat for moose and caribou because snow depths associated with the pass area are less than in other areas.

Wildlife may be displaced by snowmachines in the Broad Pass area south of Cantwell, along the Stampede corridor, in the southwest preserve, and in the Tokositna and Lower Ruth areas, and may expend valuable energy fleeing from them. Potential adverse impacts on wildlife most likely would occur during mid-to-late winter, when wildlife is likely to be in a nutritionally-stressed condition. Some dispersion is also possible in the northwest preserve as wildlife could be frightened by non-subsistence motorboat and snowmachine use.

Subsistence users in the northwest preserve and adjacent park additions have also expressed concerns about motorized use. Additional non-subsistence use involving snowmachines and motorboats in subsistence use areas, such as along Birch Creek, could result in displacement of furbearers and moose, cabin vandalism and unauthorized use, disturbed traps, and conflicts between recreational and subsistence users (letters from Miki and Julie Collins, 7/16/00, 7/24/00 and 3/3/01). Introducing new or expanded recreational uses into these areas increases the potential for conflict between consumptive and non-consumptive users. Subsistence trappers may be adversely affected during certain times of the year by displacement of furbearers, and subsistence hunters may be adversely affected during winter hunting seasons by the temporary displacement of wildlife, particularly moose and caribou.

Because of concerns about the declining number of ptarmigan in Wildlife Management Unit 13, which encompasses the east side of the south additions and important subsistence use areas south of Cantwell, hunting bag limits have been reduced and the season shortened to close on March 31. One of the reasons for shortening the season from April 30 to March 31 was to avoid hunting and activity during the nesting period in April. Increased recreation, particularly snowmachine use, could have a negative effect by

causing displacement of ptarmigan populations during their sensitive breeding and nesting period (Denali Subsistence Resource Commission Meeting Minutes, August 9, 1996 and June 28, 1993).

Due to the potential for high levels of widespread recreation that could create unfavorable conditions for wildlife (i.e. presence and noise from visitors would scare wildlife), Alternative 5 would have major impacts on distribution of subsistence resources.

(c) Habitat Loss:

None of the alternatives would result in significant habitat loss. Alternative 5 would result in the greatest habitat loss. Proposed facilities in alternative 5 include some trails and campsites on the south side of the park additions and temporary facilities to support winter recreation. These facilities would result in only negligible or temporary habitat loss.

2. Restriction of Access:

Access for subsistence uses on the ANILCA park and preserve additions is granted pursuant to Sections 811(a)(b) and 1110(a). Section 811(b) of ANILCA states that "rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on the public lands." Section 1110(a) of ANILCA authorizes the use of snowmachines for traditional activities during periods of adequate snow cover.

None of the alternatives would restrict access for subsistence. The National Park Service would take action to manage visitor use under many circumstances if that use would be detrimental to subsistence resource values of the park. Proposed registration requirements would be designed to count and track the level of use and would not disrupt subsistence uses. Subsistence users would be registered automatically by meeting eligibility requirements.

3. Increase in Competition:

Alternative 1

Increasing use of the preserve areas could eventually result in additional hunting activity and competition for wildlife resources. For example, Lake Minchumina area subsistence users have expressed concerns that unrestricted hunting in the northwest preserve, especially along the Muddy River, would deplete moose populations and prevent subsistence hunters from obtaining meat (letter from Miki and Julie Collins, 7/24/00). Although there is less subsistence use in the southwest preserve, the same effect could occur in that area.

The park and preserve additions are open to both subsistence and non-subsistence fishing. Subsistence use of fisheries is generally infrequent except in the northwest preserve.

National Park Service regulations and provisions of the Alaska National Interest Lands Conservation Act mandate that if and when it is necessary to restrict the taking of fish, subsistence users are the priority consumptive users on federal public lands. They would be given preference on such lands over other consumptive uses (ANILCA, Section 802(2)). Continued implementation of the ANILCA provisions should mitigate any increased competition from resource users other than eligible subsistence users.

Increased non-subsistence use in the park and preserve additions, especially snowmachine use, leads to more frequent user conflicts (letter from Russ Wilson, 12/28/99; letter from Miki and Julie Collins, 7/24/00). Conflict is likely in areas where non-subsistence use is rapidly increasing, such as south of Cantwell. Higher levels of use have the potential to displace local wildlife resources farther from common access corridors and into the Old Park, where these resources would be out of reach of subsistence users. In other places, such as in the northwest preserve, increased non-subsistence use over time, particularly snowmachine and motorboat use, could result in less wildlife being locally available, so subsistence users would have to travel farther to locate and harvest subsistence resources. To prevent any restriction to subsistence resources due to increased recreational use in the park additions and preserve (especially along common access corridors), the National Park Service would take a reactionary approach that may result in emergency closures to recreation.

Increased use and access near subsistence traplines near Lake Minchumina encourage snowmachiners and other travelers from the Kantishna area and the road system to use subsistence trapline routes. Every year the trapline is open, additional users follow it into the park. Subsistence users find it necessary to patrol their cabins to make sure recreational users are not using them illegally, and this requires additional time away from subsistence activities. Additional trails made from recreational users can confuse the dog teams of the subsistence users. To avoid conflicts with recreational users, subsistence users have altered their trapping schedule by pulling sets early. Subsistence users have stated that rapid increases in numbers of people cause considerable concern about their way of life and connection to a pristine environment being threatened (letter from Collins, 6/2/00).

Alternatives 2 and 3

None of the proposals in alternatives 2 and 3 are expected to result in increased competition for subsistence resources. Non-subsistence snowmachine use in the Broad Pass area, for example, could be expected to decrease significantly in alternative 2, resulting in far fewer conflicts with subsistence uses.

Alternative 4 (NPS Preferred Alternative)

Increases in recreation and facilitated access would occur throughout the park; however, management zoning under this alternative protects subsistence resources by allowing for managed growth and lower levels of use in areas used for subsistence.

Minor competition would occur in the southwest preserve as the hunting guide area would be expanded.

Alternative 5

Alternative 5 includes provisions for managing recreational uses and allocating between recreational and subsistence uses. However, the zoning scheme under alternative 5 allows for higher levels of resource impacts (as compared to the other action alternatives) and provides for increased access throughout much of the park and preserve additions, including important subsistence use areas.

As in alternative 1, improved access to the preserve areas over time could result in additional hunting activity and competition for wildlife resources. Alternative 5 would also expand hunting guide areas in the southwest and northwest preserve; however, the areas would be limited geographically and use would be limited to only certain times of the year to prevent a significant restriction to subsistence resources. Alternative 5 differs from alternative 1 in that non-subsistence use would be managed using the tools described in Actions Common to All Action Alternatives to achieve the desired conditions for each management area. However, more hunting may occur in the southwest and northwest preserve since there would be an additional guiding company in each. The potential for increased competition would likely be about the same as under alternative 1. In light of additional access and activity proposed under this alternative, the National Park Service may have to take management action in order to prevent a significant restriction to subsistence resources throughout the life of the backcountry management plan (the next 20 years).

VI. Availability of Other Lands and Alternatives to the Proposed Action

The backcountry management plan and general management plan amendment includes all areas within the park additions and preserve that are open to subsistence uses. Therefore, there are no other lands that can be substituted in the proposed action.

VII. Alternatives Considered

The backcountry management plan includes a full range of alternatives with proposals for different levels of recreational use and access improvements. This range of alternatives includes some alternatives in which impacts on subsistence uses would be avoided (see Findings below).

VIII. Findings

This analysis concludes that the preferred alternative and proposed actions would not result in a significant restriction of subsistence uses. However the National Park Service would have to take reactionary measures, such as closing areas to recreation, in order to prevent a significant restriction of subsistence resources from alternative 1 (no action alternative) and alternative 5.



The park additions and preserve shall be managed...to provide continued opportunities, including reasonable access, for mountain climbing, mountaineering and other wilderness recreational activities.

- ANILCA Sec 202 (3)(A)