

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

RECORD OF DECISION

FINAL ENVIRONMENTAL IMPACT STATEMENT

BACKCOUNTRY MANAGEMENT PLAN
GENERAL MANAGEMENT PLAN AMENDMENT

Denali National Park and Preserve
Alaska

Introduction

This record of decision documents the decision by the National Park Service (NPS) to adopt a Backcountry Management Plan for Denali National Park and Preserve and to amend the park's General Management Plan (GMP). The Backcountry Management 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 and GMP Amendment*. This backcountry plan also includes the park road corridor west of park headquarters during the winter season. It addresses management area zoning, access, wilderness management, commercial services, backcountry facilities, administrative and research uses, and boundary changes. The plan also serves 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 record of decision has been prepared by the National Park Service, pursuant to the National Environmental Policy Act of 1969 and 40 CFR 1505.2. This record of decision details the background of the project, the decision made (selected alternative), other alternatives considered, the basis for the decision, the environmentally preferable alternative, measures adopted to minimize environmental harm, and public involvement in the decision-making process.

Background

Backcountry management of Denali National Park and Preserve has been operating based on a *General Management Plan (GMP)* from 1986 and a *Backcountry Management Plan* from 1976. Although two 1997 GMP amendments updated planning for the park entrance area and road corridor and for south side development, the largest part of the park and preserve – the backcountry – still relies on the earlier planning documents for guidance. As a result, there has been little specific guidance for backcountry management

developed in response to provisions of the Alaska National Interest Lands Conservation Act (ANILCA), including special access requirements and the designation of wilderness. Changes in backcountry use in terms of aircraft overflights and airplane landings, snowmachine use, climbing and mountaineering, hiking and backpacking, and demands for commercial services have been far greater than anticipated by these 20-30 year-old documents, and additional changes are anticipated in the next 20 years. These changes could potentially have severe consequences for park resource values if unmanaged over time.

The purpose of this Backcountry Management Plan is to provide specific direction for backcountry management of Denali National Park and Preserve for the next 20 years. The plan describes 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.

Specific objectives include:

- 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;
- define these recreational opportunities 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 resource values.

Public Involvement

This record of decision follows an extensive public process that began with public scoping in 1999 (64 FR 49503, August 31, 1999). The National Park Service published a scoping newsletter with preliminary alternatives and conducted several public open houses and topic-specific workshops prior to publication of the *Draft Backcountry Management Plan, General Management Plan Amendment, and Environmental Impact Statement (Draft EIS)*, which was released for public comment on February 25, 2003 (68 FR 8782). The National Park Service held both a public workshop and a public hearing on the *Draft EIS* in six communities including Anchorage, Wasilla, Talkeetna/Trapper Creek, Cantwell, Healy, and Fairbanks, plus a single public meeting in Lake Minchumina. A total of 9,370 written and verbal comments were received. In response to

the substantive comments received on the draft, the National Park Service chose to make substantial changes to the alternatives, and published a *Revised Draft Backcountry Management Plan, General Management Plan Amendment, and Environmental Impact Statement (Revised Draft EIS)*. The *Revised Draft EIS* was released on April 26, 2005 for public comment (70 FR 21440). The National Park Service held additional public hearings in Anchorage, Talkeetna/Trapper Creek, Cantwell, Healy, and Fairbanks. A total of 15,198 written and verbal comments were submitted on the *Revised Draft EIS*. Substantive comments on the *Revised Draft EIS* resulted in modest adjustments to the preferred alternative for the *Final EIS* published on January 20, 2006 (71 FR 3290).

In addition, the National Park Service consulted with many federal, state, and tribal governments on the development of the Backcountry Management Plan, including the U.S. Fish and Wildlife Service, Bureau of Land Management, and Federal Aviation Administration. Five presentations were made at meetings of the Denali Subsistence Resources Commission between 2001 and 2005, with comments taken from each meeting. The State of Alaska participated extensively in developing both the *Draft EIS* and *Revised Draft EIS*, providing input during internal agency review and during the public comment period on both drafts, and meeting approximately ten times with National Park Service planners during the development of the *Revised Draft EIS*.

The majority of public comments favored alternatives that preserve wilderness resource values and restrict motorized access. On the *Revised Draft EIS*, 98% of individual comments supported the “People for Parks” alternative, which was presented and titled by a coalition of conservation organizations during the public comment period. The People for Parks alternative called for a set of actions that were most similar to alternative 3, although it also drew some actions from alternatives 2 and 4. Many of these comments rejected the approach to access management described in alternatives 4 and 5. A small minority of comments favored management approaches that emphasized continued freedom of access, particularly by airplane.

Decision

The National Park Service has decided to adopt the modified version of Alternative 4 presented in the *Final Environmental Impact Statement*. The overview of this decision is as follows:

This backcountry management plan will 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 will 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 will 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 will be managed for dispersed, self-reliant travel, and will include opportunities for extended expeditions in very remote locations.

Major actions of this alternative include:

- Subdivision of the “Natural” zone in the 1986 *General Management Plan* into a variety of management areas that are designed for different types of backcountry experiences:** The management areas are defined by indicators and standards for resource and social conditions, which establish a carrying capacity for the area and help to clarify expectations for visitors. These management areas include a few areas of relatively dense use and higher levels of impacts. These high use areas accommodate transportation into the backcountry and 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. The management areas are depicted on the attached maps from the *Final EIS*, and their purposes are described as follows:

Management Area	Purpose
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.
B	Provide opportunities for wilderness recreational activities suitable for day-users and overnight users that are remote and require self-reliance.
C	Provide opportunities for climbing and mountaineering experiences in a wilderness setting.
D	Provide opportunities for extended expeditions that are remote and require self-reliance, significant time commitment, and thorough advance planning.
Portal	Provide high-use airplane landing areas that provide access to remote parts of the park and preserve. Year-round or seasonal.
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.
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.
Backcountry Hiker	Provide day use trails into the backcountry in areas that are accessible to many visitors. Year-round or seasonal.
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.
OP1	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.
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.
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.

- **Management of visitor access through adaptive management:** Resource and social conditions will be monitored and access management tools will be applied to achieve the standards for each management area. This approach is consistent with the Visitor Experience and Resource Protection framework used by the National Park Service to address carrying capacity.
- **Establishment of wilderness management criteria, group size limits, restrictions on use of climbing tools, and a strategy for preventing social trail formation:** The entire park and preserve backcountry will be managed to preserve wilderness resource values and provide wilderness recreational opportunities.
- **Provision of limited commercial services in the backcountry** associated primarily with wilderness recreation and transportation to wilderness recreation, and scenic air tour landings.
- **Limited development of visitor facilities in the backcountry**, including a continuation of the “no formal trails” policy park wide (with minor, specific exceptions), no public use cabins or shelters in the backcountry, and five designated campsites in the southern Kantishna Hills.
- **Application of the minimum requirement/minimum tool process throughout the park and preserve backcountry**, research permit requirements for all National Park Service and external research, and development of a plan for NPS administrative and research use of aircraft in the wilderness, park additions, and preserve.
- **A land exchange** with the State of Alaska to align the park boundary with the Ruth, Tokositna, Chulitna, and Coffee Rivers.

Other Alternatives Considered

The three other action alternatives evaluated in the *Final EIS* each represented a different vision for the future of the park backcountry. The general vision of the no action alternative and each of the three other action alternatives considered is outlined below.

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 Road Corridor Development Concept Plan*, the 1997 *South Side Denali Development Concept Plan*, and the 1976 backcountry management plans with amendments. 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 previous plans.

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 would include 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 opportunities for 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 existing high activity areas at the Ruth Glacier and the 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.

Alternative 5

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 managed primarily 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.

Basis for the Decision

The National Park Service selected the modified alternative 4 because it best meets the plan purpose of providing this and 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.

Specific objectives of the plan include protecting and preserving Denali's natural and cultural resources and wilderness resource values. The environmental analysis presented

in the *Revised Draft EIS* and *Final EIS* shows that the wilderness resource values and natural sound resources are particularly sensitive to decisions made through this planning process. Soundscape impacts are largely caused by noise associated with aircraft overflights and airplane landings throughout the park and preserve and, to a lesser extent from snowmachine use primarily in the southern park additions. Adverse impacts to wilderness resource values arise from noise and other impacts associated with airplane and snowmachine access, the loss of opportunities for solitude along Mount McKinley's West Buttress, and to a lesser degree administrative actions in the backcountry such as trail construction, installation of research and other equipment, and the establishment of seasonal administrative camps.

The modified alternative 4 establishes upper limits on the amount of noise and other conditions that indicate adverse affects on the natural soundscape or wilderness resource values. The alternative does not reduce overall adverse impacts that are already occurring, but does prevent further deterioration and thereby avoids the potential for impairment of these park resources. Alternatives 2 and 3 would reduce these resource impacts, but alternative 2, in particular, would also reduce the range of possible visitor experiences (see below). Alternative 5 would result in increased impacts to many resources, including natural soundscapes and wilderness resource values.

The objectives of the plan also include providing for the public's freedom of use and enjoyment of the park backcountry, and for opportunities for wilderness recreational activities, including reasonable access. The important qualifier for the type of recreational opportunities to be provided is derived from ANILCA Section 202(3)(a), which articulates as a purpose for the Denali additions "to provide continued opportunities, including reasonable access, for mountain climbing, mountaineering, and other wilderness recreational activities." The objective is also consistent with management of the backcountry in the former Mount McKinley National Park, which ANILCA designated as wilderness.

Many of the actions that were common to all of the action alternatives, including the selected alternative, were derived from these objectives. Management areas emphasize dispersed use, with human impacts substantially unnoticeable. Commercial services are generally limited to those necessary and appropriate for facilitating visitors' understanding and enjoyment of the wilderness recreational purposes of the area. NPS administrative actions are subject to the minimum requirement/minimum tool process throughout the backcountry to protect wilderness resource values and, thereby, the wilderness recreational activities which depend upon them. Portal areas are designated to provide "reasonable access" to important access points at glacier landing areas.

The modified alternative 4 further supports these objectives, in particular the provision of reasonable access, through several measures. The designation of Corridor management areas allow higher levels of use along important linear access routes, such as rivers and some former mining routes in the Kantishna Hills. Access to the backcountry is managed primarily through adaptive management rather than primarily by the prescriptive measures proposed in alternatives 2 and 3. Commercial air taxis are allowed to land

throughout the park additions and preserve rather than just at designated Portals. Educational and/or commercially guided hiking activities are allowed throughout the park and preserve. The modified version of alternative 4 is particularly distinguished from alternative 2, which because of restrictions on airplane and motorboat access and guided activities would have provided little recreational opportunity for visitors who are not capable of independently mounting their own overland expeditions.

A further objective of the plan is to define a range of visitor opportunities within the context of a spectrum of opportunities on public lands in the Denali region. As described above, the statutory purposes of the park define Denali's niche on the spectrum as a park that provides opportunities for wilderness recreational activities. Noting that "wilderness" in ANILCA is defined the same as in the Wilderness Act [Section 102(13)], all of the action alternatives identify the characteristics of the unique Denali backcountry experience, including the absence of permanent human structures, privacy and isolation, self-sufficiency, and minimal shelter or assistance from the devices of modern civilization among others. The modified alternative 4 implements this general guidance by restricting backcountry facilities such as trails or campsites to areas of existing resource impacts, continuing and extending a "no formal trails" policy throughout the backcountry, and omitting the possibility of public use cabins or new administrative camps.

This plan found scenic air tours consistent with a purpose of the park additions and preserve found in ANILCA Section 202(3)(a), "to protect and interpret the entire mountain massif and the additional scenic mountain peaks and formations." Scenic air tours, including associated glacier landings, provide an unparalleled opportunity to interpret the Mount McKinley massif and its surrounding peaks and glaciers, and an equally unparalleled opportunity to inspire park visitors. However, they can also create some of the greatest adverse resource impacts in the backcountry, particularly affecting natural sound and wilderness resources. Hence, under all action alternatives, the National Park Service provided for scenic air tours within the range of opportunities in the Denali backcountry, though with constraints determined by management area standards to protect park resource values. In the selected alternative, the seasonal Ruth Glacier Special Use Area and surrounding areas are designated to allow for sufficiently high levels of aircraft traffic and airplane landing sites to accommodate existing levels of this activity. This level of resource impact is an exception to the framework of wilderness management presented in the plan, with adverse impacts allowed to accommodate an activity that fulfills this specific park purpose.

It is notable that ANILCA Section 202(3)(a) does not apply to the Denali Wilderness, which encompasses 99% of the area of the former Mount McKinley National Park. The direction for these lands is for them 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" (Wilderness Act of 1964). The interpretation of Mount McKinley and the Alaska Range is not an identified purpose

of the Denali Wilderness, nor is it a purpose given in the 1917 statute establishing Mount McKinley National Park. Because scenic air tour activity conflicts with purposes of the wilderness area, the National Park Service did not propose actions to provide for this activity in the Denali Wilderness under any of the action alternatives. The selected alternative establishes the highest level of protection for natural sound resources in this area.

The West Buttress Special Use Area is also an exception within the wilderness management framework. This Special Use Area provides for continued access to Mount McKinley, an international destination for climbers and mountaineers. The climbing season is short, expeditions are necessarily lengthy, and most climbers use the well-defined West Buttress route for relative ease and safety. The resulting crowding far exceeds conditions appropriate in the rest of Denali, but it is acceptable here as an exception associated with this unique park resource. In order to insure long-term resource protection and climber safety in this high use area, the plan limits the number of climbers on Mount McKinley to 1,500 during the main mountaineering season (April 1 – August 1), to be re-evaluated in 10 years.

ANILCA Section 1110(a) allows snowmachine use “for traditional activities” subject to reasonable regulation, but the term “traditional activities” is not defined for the park additions in either statute or regulation. Alternatives 2 and 3 proposed a definition for the term, but for the purposes of the plan the National Park Service determined that is not necessary to make a decision on this issue. The modified alternative 4 sets specific standards for resource and social conditions for the various management areas of the park. For the National Park Service, the highest priority for the backcountry is to ensure that the standards are met, which can be accomplished without defining the term “traditional activities.” If standards are not achieved or conditions are deteriorating in part or in whole because of snowmachine use, the National Park Service would take actions to manage visitor use, which could include a determination of which activities are traditional.

The modified alternative 4 and alternative 3 both provided for the greatest range of visitor opportunities, including opportunities both accessible and remote, assisted and non-assisted, and short and long-duration. Alternative 1 and alternative 5 provided insufficient protection for remote, wilderness-dependent activities, and the environmental impact analysis concluded that opportunities for those activities would decline over time if one of these alternatives was selected. Alternative 2 provided few opportunities for visitors who require services or assistance to experience the Denali backcountry, or who are unable to make a lengthy time commitment.

Environmentally Preferred Alternative

Both alternative 3 and alternative 4 were identified as environmentally preferred alternatives in the *Revised Draft EIS*. The modifications to alternative 4 in the *Final EIS* did not change this evaluation. The environmentally preferred alternative is “the alternative that will promote the national environmental policy as expressed in Section 101 of the National Environmental Policy Act. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources.” (Question 6, CEQ “Forty Most Asked Questions on CEQ NEPA Regulations”). Section 101 of NEPA states “...it is the continuing responsibility of the Federal Government to use all practicable means...to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may –

- fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.
- ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings.
- attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.
- preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.
- achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life’s amenities.
- enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.”

Based on these criteria, the National Park Service determined that alternatives 3 and 4 are the environmentally preferred alternatives, because they attained the widest range of beneficial uses of the environment and support a diversity and variety of individual choice without substantially degrading park resources. As documented in the *Final EIS* Chapter 4, Environmental Consequences, alternative 2 narrows the range of opportunity for using resources substantially while alternative 5 allows for major adverse impacts to park resources such as natural soundscapes and wilderness while decreasing the range of available wilderness recreational opportunities. Alternative 1 would result in major adverse impacts to many park resources and the impairment of wilderness and natural sound resources.

Measures to Minimize Harm

The Backcountry Management Plan largely contains measures to manage recreational visitor use that is occurring and increasing under existing regulations and commercial visitor services authorizations. The plan is thus largely concerned with minimizing harm from recreational use. Examples of specific measures include the aircraft overflights working group, group size limits, and commercial services allocations. The measures for

minimizing harm are integral to the actions of the plan and are fully explained within the selected alternative and the accompanying environmental impact analysis.

Central to the plan's strategy for minimizing harm is an adaptive management program for detecting changes in backcountry conditions and responding to those changes. The plan identifies key indicators for resource and social conditions. Indicators are not intended to measure every resource value in the backcountry of Denali, but represent measurable qualities that should "indicate" overall conditions. In addition, the plan sets standards for each indicator that represent thresholds for management action. It also provides an accompanying monitoring strategy for each indicator, so that conditions in the backcountry can be compared to standards over time. The indicators, standards, and monitoring strategies are described in Tables 2-1 to 2-9 of the *Final EIS*. If the standards are approached or exceeded, the NPS would employ a set of identified "Access Management Tools" described briefly in Table 2-11 to manage visitor use so that park resource values are protected. 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.

ANILCA Section 202(3)(a) and the 1917 legislation establishing Mount McKinley National Park provide that protection of wildlife and wildlife habitat are statutory purposes of the original park and the park additions respectively. Under the adaptive management framework, the modified version of alternative 4 includes a commitment to monitor the populations, distributions, and demographics of major wildlife species during plan implementation, and to take action to manage visitor use if that use is detrimental to wildlife resource values. Wildlife indicators will be identified, and monitoring these and other indicators and standards is a priority for successful plan implementation. However, if data or information is lacking, park managers will use the best professional judgment to take management actions to manage visitor use and protect park resource values, even if the agency cannot demonstrate conclusively that such damage would occur.

Non-Impairment Determination

The analysis presented in Chapter 4: Environmental Consequences of the *Final EIS* shows that no park resource values would be impaired as a result of implementing the modified version of alternative 4. Implementation of the alternative would potentially result in minor to moderate adverse impacts to ice-rich permafrost soils, vegetation, wildlife, and subsistence resources, and the actions in this alternative would not reduce the adverse cumulative impacts to the natural sound and wilderness resources that are already occurring in portions of the park and preserve because of aircraft, snowmachine, and other motorized uses. However, the actions would be sufficient to prevent impairment of the resources, and the alternative is therefore consistent with the National Park Service Organic Act.

Conclusion

A *Federal Register* notice announcing the availability of the *Final Backcountry Management Plan, General Management Plan Amendment, and Environmental Impact Statement* was published by the Environmental Protection Agency on January 20, 2006, commencing the required 30-day no action period (71 FR 3290).

The criteria and considerations presented in this Record of Decision support selection of the preferred alternative as modified in the *Final Backcountry Management Plan, General Management Plan Amendment, and Environmental Impact Statement*. The final plan is hereby approved.

Recommended: _____ **Effective Date:** _____
Superintendent
Denali National Park and Preserve

Approved: _____ **Effective Date:** _____
Director, Alaska Region
National Park Service