

National Park Service
U.S. Department of the Interior

Denali National Park and Preserve
Alaska



Finding of No Significant Impact

Climbing Allocation for Mount McKinley in Denali National Park

June 2012

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Superintendent, Denali National Park and Preserve Date

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FINDING OF NO SIGNIFICANT IMPACT

Climbing Allocation for Mount McKinley in Denali National Park

Denali National Park and Preserve, Alaska

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The National Park Service (NPS) prepared an environmental assessment (EA) to evaluate alternatives for climbing allocations on Mount McKinley in Denali National Park and Preserve.

The NPS has selected Alternative 3, Flexible Allocation (NPS preferred alternative), with modifications. Under this alternative, consistent with the limit on guided activities determined by the 2006 Backcountry Management Plan (BCMP), the NPS would make 25 percent of the permits (375) available for guided climbers on January 1, 16 months prior to the climbing season. However, approximately a year prior to the climbing season, additional unused permits would be made available for guided climbers. Independent climbers will be encouraged to register early to guarantee their climbing spot. It is the intention of the NPS to maintain a reasonable number of climbing permits for independent climbers throughout the climbing season.

Responses to public comments are found in Attachment A. An Errata section has been provided in Attachment B that provides clarifications, modifications or additional information to the EA.

ALTERNATIVES

Three alternatives were evaluated in the EA.

Actions Common to all Alternatives

- The limit of 1,500 climbers from April 1 to August 1 would remain in effect on Mount McKinley. This limit is established in the Code of Federal Regulations (36 CFR 13.910). This limit pertains to all climbers attempting to summit Mount McKinley on any route. This limit does not pertain to climbers on Mount Foraker or other peaks within the park.
- Guided climbers, guides, and guides in training would be counted towards the concessioner's allocation. One guide leading several different trips throughout the season would be counted on each trip towards the concessioner's allocation.
- NPS mountaineering patrol staff would not be counted against the 1,500 limit.
- Researchers would not be counted against the 1,500 limit unless they plan to summit the mountain which would require a climbing permit.
- Peak season is defined as May 15-June 15, which represents the typical period of highest use on the mountain. The NPS would not increase current commercial use levels during this period.

Alternative 1, No Action

Under the No Action Alternative, the NPS would retain the standards of the BCMP. This would limit guided climbing parties to no more than 25 percent (375) of the 1,500 available opportunities per season. If fully used, current contracts with guiding companies allow for approximately 50 percent (750) of climbing permits on Mount McKinley to be guided. These contracts were in place prior to the finalization of the BCMP, and for the remainder of these contracts (through December 31, 2013) concessioners will be allowed to provide guiding services consistent with the language in their contracts. However, any future contracts issued under the No Action Alternative would comply with the determinations of the BCMP.

Alternative 2, Fixed Allocation: Guarantee 25 percent (375) guided climbers and allows up to 50 percent (750) guided climbers.

Under Alternative 2, the NPS would utilize the 25 percent (375) cap on guided activities determined by the BCMP. However, the demand for guided climbs has increased considerably since the BCMP process was initiated. The NPS would like to continue to offer guided trips to the public and has determined this guiding activity to be necessary and appropriate. Alternative 2, therefore, allows guiding companies to obtain up to 50 percent (750) of the 1,500 annual climbing permits as long as the demand for a guided climbing experience is present. The 50 percent (750) would not be guaranteed as part of the commercial authorization and may be lowered to the guaranteed minimum of 25 percent (375) if the demand for the independent trips increases over the life of this plan.

Alternative 3, Flexible Allocation (NPS Preferred): Guarantee 25 percent (375) guided climbers and allow guided climbers to use some unused permits.

Under this alternative, the NPS would utilize the 25 percent (375) cap on guided activities determined by the BCMP. This alternative proposes to encourage independent climbers to register early to guarantee their climbing permit. After a certain date, any unused permits may be released for concessioners to use for additional guided climbers. The maximum number of permits available for guided climbers could exceed the limit (750 permits) in Alternative 2 if independent climbers do not claim them. Details and deadlines of this system will be available to the commercial and independent climbing communities through regular registration channels in the season prior to its implementation. It is the intention of the NPS to maintain a reasonable number of permits for independent climbers throughout the climbing season.

Environmentally Preferable Alternative

The No Action Alternative would allow fewer guided climbers on Mount McKinley which would support higher qualities of wilderness character; it is the environmentally preferred alternative.

PUBLIC INVOLVEMENT

The public comment period for this project originally occurred from September 13 – October 15. A two-week extension to October 31, 2011 was added at the request of the Alaska congressional delegation. The EA was posted on NPS's Planning Environment Public Comment (PEPC) website. A news release was sent to 40 media outlets, which included newspapers, wire services, radio, TV, and online publications. It was also sent to local, state, and federal agencies, Alaskan

military bases, and political officials. In addition, over 100 businesses and organizations received the news release.

The NPS received 288 pieces of correspondence on the Draft EA. Correspondence was received through the PEPC website, email, postal mail, and fax. There were 61 commenters who identified themselves as members of a climbing company or climbing organization. Correspondence was received from two government agencies/representatives. One comment was received from an environmental organization and one comment was received from a local business owner. The remaining 223 pieces of correspondence were from individuals. Public comments focused on public access for guided climbers, commercial use on Mt. McKinley, wilderness management, the registration process, and guides.

DECISION

The NPS decision is to select Alternative 3 (Flexible Allocation) along with mitigating measures.

Mitigation Measures

The following mitigation measures apply to the selected Alternative 3 (Flexible Allocation).

- Process would be monitored as described in the BCMP.
- To retain the current quality of the peak season visitor experience, there will be no increase for guided climbers start days during this time period.
- For commercial trips, the guide to climber ratio would be no less than one guide to four climbers. On the West Buttress the maximum number of guides will be limited to one guide for every two climbers. The Park Superintendent may allow for variation of this ratio on a case-by-case basis, the process for which will be detailed in the concession contract.
- The number of guided climbers allowed to start on any one day may be managed per concession contracts in an attempt to decrease congestion at portals. Inclement weather and poor flying conditions would be taken into account.
- Availability of permits for the independent climber would be monitored to ensure they would not be displaced by a guided climber.
- Any new registration procedures would be available the season prior to implementation through the same communication methods currently utilized by NPS.

Rationale for the Decision

The selected action (Alternative 3, Flexible Allocation) would satisfy the purpose and need of the project better than the other alternatives because the proposed alternative will provide for an equitable distribution of all available climbing permits to meet the demands from both independent and guided climbers.

The 2006 Backcountry Management Plan approved the West Buttress route of Mount McKinley (the most heavily used mountaineering area in the park) as a special use management area. A regulated seasonal limit of 1,500 climbers for Mount McKinley was also put in place to protect park resources and values. NPS determined in the BCMP that the activity of guided climbing is

necessary and appropriate since the activity depends on the unique character of Denali and cannot be found on nearby public lands, is consistent with park purposes, and assists visitors in exploring the backcountry by means that require specialized knowledge. In addition, the activities are provided in a manner that furthers the protection of park resources and values and enhances visitor use and enjoyment by allowing climbers the choice of whether to climb independently or accompany an experienced guide when attempting to summit Mount McKinley.

The Environmental Assessment for a Climbing Allocation for Mount McKinley contains an evaluation to determine the extent of commercial services necessary to realize the recreational and educational purposes of the Mount McKinley area of the Denali Wilderness. Given the extremely challenging nature of climbing on Mount McKinley, and realizing that certain visitors do not have the skills or experience to attempt the climb independently, the NPS has determined that the option to climb with a guide should be available. Without guided climbs and the technical assistance and expertise provide by a guide, many visitors would not experience a climb on Mount McKinley and miss the recreational and educational purposes of the Denali Wilderness. The NPS has considered impacts to the wilderness experience including visitor opportunities and solitude, and to wilderness area resources such as soundscape, both during scoping, during preparation of the EA, and from those ideas brought forward during the extensive public comments on the EA. Three alternatives were evaluated in the EA, and a modified action alternative is chosen that is in keeping with the beneficial history of guided climbing on Mount McKinley, and which would allow independent climbers advanced access to climbing permits, all while staying within the seasonal limit of 1,500 climbers. Therefore, the NPS finds that the action chosen represents the extent of commercial services necessary to realize the recreational and other wilderness purposes of the area. Within the 1,500 limit, this plan allows the NPS to adaptively manage allocations between guided and independent climbers to prevent artificially limiting climbing access if the drop in permit requests by independent climbers continues. Priority is still given to independent climbers while allowing for a minimum of 25 percent guided use.

Significance Criteria

The preferred alternative (Alternative 3) will not have a significant effect on the human environment. This conclusion is based on the following examination of the significance criteria as defined in 40 CFR Section 1508.27.

(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

Alternative 3 will have minor adverse impacts to park operations, wilderness, and soundscapes. Evaluations also included minor benefits to visitor opportunities and socioeconomics. There will be no impact to subsistence uses.

(2) The degree to which the proposed action affects public health or safety.

No changes are expected to public health and safety.

(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetland, wild and scenic rivers, or ecologically critical areas.

The environmental effects of Alternative 3 do not affect historic or cultural resources, farmlands, wetlands, rivers, or other critical areas.

(4) The degree to which effects on the quality of the human environment are likely to be highly controversial.

The effects on the quality of the human environment would not be controversial. The EA was distributed to over 200 agencies, organizations, and individuals for review. The NPS received 288 comments with various concerns with more commenter's supporting the preferred alternative over the other alternatives. Many commenters suggested changes to the registration dates and those changes have been accommodated. The environmental analysis concluded that alternative 3 would have no more than minor impacts.

(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The environmental effects of the selected alternative (Alternative 3) do not involve unique or unknown risks.

(6) The degree to which the action may establish a precedent of future actions with significant effects or represents a decision in principle about a future consideration.

This plan is necessary to prepare for the 2012 reissuance of prospectuses for guided mountaineering contracts in Denali. The contracts will be in effect for the subsequent 10 years. Commercial use limits defined by this FONSI will be included in both prospectus (business opportunity) documents and in the final contract language. All actions would be reassessed at the end of the contract term.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

The actions in Alternative 3 do not significantly contribute to cumulative impacts of any of the impact topics evaluated. These impact topics included park operations, wilderness, soundscapes, visitor opportunities, and socioeconomics.

(8) Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The selected alternative has no potential to affect historic properties.

(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

The selected alternative would not adversely affect an endangered or threatened species or its habitat.

(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

The selected alternative (Alternative 3) would not violate any Federal, State, or local law.

FINDINGS

“The levels of adverse impacts to park resources anticipated from the selected alternative will not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the natural or cultural integrity of the park.”

“The selected alternative complies with the NPS Organic Act and ANILCA. There will be no restriction of subsistence activities as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 810(a) Summary Evaluation and Findings.”

“The National Park Service has determined that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement is not needed and will not be prepared for this project.”

ATTACHMENT A
NPS RESPONSES TO PUBLIC COMMENTS
for the
Environmental Assessment
For Climbing Allocation for Mount McKinley in Denali National Park
Denali National Park and Preserve

The NPS has read and considered all comments received. Responses to substantive comments are provided below. A substantive comment is defined as one which leads the NPS to: (1) modify an alternative, including the proposed action; (2) develop and evaluate an alternative not previously given serious consideration; (3) supplement, improve, or modify the environmental analysis; (4) make factual corrections (5) explain why comments do not warrant further agency response (CEQ NEPA Regulations 1503.4). The NPS responded to some non-substantive comments to provide clarification on topics of interest to commenters.

Access

Summary Issue Statement: The NPS received many comments that stated access to public lands for guided climbers should be equal to the access given to independent climbers.

Response: All climbers have a similar right to access public land. However, Mount McKinley is within a congressionally designated Wilderness and is subject to management under the Wilderness Act. The Act states that commercial services may be performed in wilderness “to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.”

Commercial Use

Summary Issue Statement: The NPS received a range of comments regarding the percentage of commercial use that should be allowed on Mount McKinley. Several comments requested that the NPS minimize the amount of commercial activity on the mountain and not modify the 25 percent commercial limit approved in the BCMP. The majority of comments requested that the NPS increase the percentage of commercial use allowed on Mount McKinley above 25 percent.

Response: The preferred alternative does not eliminate the 25% commercial use allocation set in the Backcountry Management Plan. Rather, it reaffirms a necessary level of commercial use on Mount McKinley with the flexibility to address visitor demand within the regulated climbing limit of 1,500 climbers per season. The preferred alternative allows for the flexibility of a higher percentage of guided climbers on Mount McKinley for the next ten-year commercial contract period.

Summary Issue Statement: The NPS received comments that requested increases to commercial use be limited to the West Buttress route of Mount McKinley.

Response: Currently, mountain guide concessioners are limited to the number of climbers they can guide on the West Buttress route during the climbing season. Allowing for additional use of this popular route during the peak season may add to a sense of crowding and increase safety concerns. The NPS will modify future contracts to allow for more commercial use during the shoulder periods on either side of the peak season as long as demand is present and the 1,500 limit is not exceeded.

Summary Issue Statement: Several comments were received that expressed concern that all of the alternatives would result in decreased revenue for mountain guide concessioners.

Response: The preferred alternative would potentially allow for more guided climbers on Mount McKinley when compared to prior years. This would potentially result in increased revenues.

Summary Issue Statement: The NPS received comments that suggested concessioners should receive a higher allocation of the available capacity since guided expeditions provide greater safety for the visitor and promote greater resource protection.

Response: Data to support this suggestion is not found in recent statistics. Since 2004, the West Buttress route of Mount McKinley has been attempted by 8,830 climbers representing 4,979 independent and 3,851 guided climbers. Of the seventeen climbers who lost their lives during this time period, 9 were independent climbers and 8 were guided climbers

Summary Issue Statement: Several comments requested that the NPS eliminate the current percentage based system that allocates use between independent and guided climbers, and encouraged the implementation of a system with greater flexibility to respond to visitor demands.

Response: The preferred alternative was developed to respond to the current visitor interest and demand for guided climbing opportunities, while retaining the flexibility to adjust to a change in visitor demand for more independent climbing opportunities.

Wilderness Management

Summary Issue Statement: Several comments were received that encouraged the NPS to manage West Buttress route on Mount McKinley differently than the rest of the Denali Wilderness. Other comments suggested that commercial use on Mount McKinley should be acknowledged for meeting the needs and interest of park visitors.

Response: Mount McKinley is located within the Denali Wilderness, designated by Congress in 1980. The West Buttress Special Use Area on Mount McKinley was established in the BCMP to accommodate large numbers of climbers during the primary climbing season. This management area has a 25 percent limit on commercial use where there is a visitor use ceiling. This limit was established 1) when 25 percent was the approximate percentage of use by guided climbers on Mount McKinley, and 2) as a limit to commercialization of the wilderness backcountry experience.

The 1964 Wilderness Act states a general principle that ... "there shall be no commercial enterprise...within any wilderness area...". The Act then goes on to provide an exception in Section 4(d)(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 areas." The allowance for commercial trips is therefore on an "as necessary" basis, especially within a sought-after wilderness recreational area that has a fixed limit of users. The preferred alternative follows this direction. Past climber registration indicates that the anticipated demand from both types of climbers will be met during the life of the next contracts.

Registration Process

Summary Issue Statement: The NPS received comments on the registration process, specifically to require an earlier application process to receive a climbing permit and to consider the different needs of guide companies and independent climbers.

Response: In general, both of these suggestions are incorporated in the preferred alternative. Registration opportunities would be available 16 months prior to the climbing season rather than the current seven months prior. The preferred alternative would administer a reservation system that would be responsive to the business needs of the guide companies while allowing independent climbers to obtain permits as late as is practicable.

Guides

Summary Issue Statement: Comments were received that requested the NPS not count guides as part of commercial use for safety reasons. Concerns suggested that the number of guides may be reduced in commercial groups to allow for more guided climbers. Additional concerns were raised that by counting guides under commercial use, there may be a reduction in training opportunities for apprentice guides.

Response: Under the preferred alternative, the NPS would set a minimum guide ratio of one guide for every four clients, and set a maximum guide ratio of one guide for every two clients. The Superintendent would be authorized to allow for variances of these limits on a case-by-case basis, the process for which will be detailed in the concessions contract.

The NPS encourages concessioners to employ guides with the highest level of experience. Prospective guides could gain Mount McKinley experience by climbing on Mount McKinley as an independent climber, not associated with a commercial expedition. Guides are only present due to the demand for guided mountaineering opportunities; therefore they are counted as commercial use.

Seasonal Capacity

Summary Issue Statement: Several comments requested that the NPS change the 1,500 limit set in the BCMP. Comments ranged from those requesting an increase for greater visitor use in the future, to those requesting a decrease.

Response: The 1,500 seasonal climber limit represents a compromise between wilderness values, capacity to manage visitor use (including search and rescue activities) and historic and projected visitor demand. Changing the 1,500 limit on Mount McKinley during the regulated season (April 1 - August 1) is beyond the scope of this EA.

ATTACHMENT B

ERRATA

An errata section provides clarifications, modifications or additional information to the EA. The modifications here do not significantly change the analysis of the EA and, therefore a new or revised EA is not needed and will not be produced.

1. **Correction.** Change the EA, page 5, Background, to read: “Those attempting Mount McKinley and Mount Foraker must also pay a special use fee of ~~\$200~~ \$350 per climber...”

The fee to climb Mount McKinley was raised from \$200 after the EA was out for public review. The full \$350 is due at the time of registration. If a registrant decides not to climb before January 15 of the climbing year, \$250 of their registration fee will be refunded. After January 15 of the climbing year, no refund of the registration fee will be provided.

2. **Correction.** Change the EA, page 7, Legal Context, to read: “The contracts expire at the end of 2013. The park expects to issue a prospectus inviting proposals for the award of new 10 year contracts beginning in 2014.”

The 2012 date was in error.

3. **Correction.** Change the EA, page 13, Actions Common to all Alternatives, to read: “For commercial trips, the guide to climber ratio will be no less than 1 guide to 4 climbers.”

This correction puts the Actions Common statement in line with the Mitigation statement on page 14. The intent is that the guide ratio would be in force on all of Mount McKinley, not just on the West Buttress.

4. **Correction.** Change the EA, page 18, Park Operations, to read: “...South District operations in 2010 (John Leonard, pers. comm.).

This reference was left out of the EA.

6. **Correction.** Change the EA, page 22, Visitor Opportunity, to read: “...resulting in a ~~14%~~ 56 percent reduction...”

The 14 percent figure was the decrease relative to the 1500 limit, not the potential guided climber use decrease.

7. **Correction.** Change the EA, page 23, Alternative 1 Wilderness Cumulative Effects, to read: The BCMP resulted in 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. The BCMP determined there would be major adverse cumulative impacts because of the ongoing absence of solitude on the West Buttress route of Mt. McKinley during the primary climbing season and high levels of encounters, noise, and

motorized transport in the Dunkle Hills and the area between the Kanikula and Ruth Glaciers in the southern park additions. Therefore, this alternative would be a slight improvement due to the reduction of guided climbers. Overall cumulative effects would still be major, adverse, and long-term.

8. Correction. Change the EA, page 25, Alternative 2 Wilderness Cumulative Effects, to read: The actions approved in the BCMP 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. The BCMP determined there would be major adverse cumulative impacts because of the ongoing absence of solitude on the West Buttress route of Mt. McKinley during the primary climbing season and high levels of encounters, noise, and motorized transport in the Dunkle Hills and the area between the Kanikula and Ruth Glaciers in the southern park additions. This alternative would not contribute to the overall cumulative impacts.

9. Correction. Change the EA, page 27, Alternative 3 Wilderness Cumulative Effects, to read: The actions in the preferred alternative of the BCMP 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. The BCMP determined there would be major adverse cumulative impacts because of the ongoing absence of solitude on the West Buttress route of Mt. McKinley during the primary climbing season and high levels of encounters, noise, and motorized transport in the Dunkle Hills and the area between the Kanikula and Ruth Glaciers in the southern park additions. This alternative would have a negligible contribution to the overall cumulative impacts.

1. Modification. Revise the language on page 13, 14, 33, 35: In the description of the alternatives given in Chapter 2 and summarized in Attachment B, the word “guarantee” is to be replaced by the phrase “set aside.”

The BCMP does not guarantee that 25 percent of the 1,500 climber limit on Mount McKinley would be used for guided climbs. It sets a limit of 25 percent. However, recent experience has shown that setting aside 25 percent of the permits for guiding companies will not adversely affect the opportunity over the life of these contracts for independent climbers to get a climbing permit.

2. Modification. Revise the peak season dates from May 20 – June 20 to May 15 – June 15.

Additional research has indicated that these dates better match the recent demand and use.

3. Modification. Add to mitigation measures on page 14 of the EA:

- Any new registration procedures will be available the season prior to implementation through the same communication methods currently utilized by NPS.

4. Modification. Add to Appropriate Use on page 8:

Guides also act as stewards of the mountain by teaching Leave No Trace practices, marking trails, and appropriately disposing of waste.

ATTACHMENT C

Determination of Non-Impairment Climbing Allocation for Mount McKinley in Denali National Park

The NPS Organic Act of 1916 and reaffirmed by the General Authorities Act of 1970 prohibit impairment of park resources and values. The 2006 NPS Management Policies use the terms “resources and values” to mean the full spectrum of tangible and intangible attributes for which the park is established and managed, including the Organic Act’s fundamental purpose and any additional purposes as stated in the park’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 NPS is to ensure that park resources and values will continue to exist in an unimpaired condition that will allow people to have present and future opportunities for enjoyment of them.

A determination of non-impairment is made for each of the resource impact topics carried forward and analyzed in the Climbing Allocation environmental assessment for the selected alternative (Alternative 3). The description of park significance in Chapter 1 was used as a basis for determining if a resource 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.

Impairment determinations are not provided for visitor opportunity, park management, or socioeconomic resources because impairment determinations relate back to park resources and values. These impact areas are not considered to be park resources or values subject to the non-impairment standard.

Wilderness

Mount McKinley is within the Denali Wilderness, established by ANILCA in 1980. Since the West Buttress is the least technically challenging route to the summit, it is used by approximately 90% of the climbers. Evidence of human use along the route would not meet the typical wilderness ideals during the climbing season, and the BCMP describes this area as having a high likelihood of encounters with people and moderate levels of evidence of modern human use, litter and human waste, and natural sound disturbance.

Alternative 3 would result in an increase in guided climbers on the mountain. The wilderness quality of solitude may diminish for the independent climber since they will encounter more guided climbers than current limits would allow and they could feel that there would be a lessening of self-reliant recreation in that part of the wilderness. However, the limit on the total

number of climbers on Mount McKinley during the main climbing season would not change. The plan allows the NPS to adaptively manage allocations between guided and independent climbers to prevent artificially limiting climbing access if the drop in permit requests by independent climbers continues. Priority is still given to independent climbers while allowing for a minimum of 25 percent guided use.

This minor effect on wilderness resources and values would not result in impairment because the preferred alternative retains the seasonal limit on climbing Mount McKinley, preserves an independent climbing priority, and retains a historic mechanism, i.e. guiding, to share specialized knowledge about mountaineering under unique circumstances.

Soundscape

The soundscape of Mount McKinley and surrounding areas has a distinct set of characteristics. Wind is the most common natural sound heard, but avalanches and glacier movements are frequently audible. Sound reflection and echoes are common from vertical faces of rock and ice. Fresh snow absorbs sounds well and therefore diminishes sound propagation, but loses this absorptive property upon compaction and metamorphosis. Noise in parks per Director's Order #47 is generally defined as an unwanted or undesired sound, often unpleasant in quality, intensity or repetition. Human-induced sounds on Mount McKinley consist of air-taxi services for climbers, human voices, equipment, aircraft overflights and some general aviation. Sounds originating from the ground include human-generated sounds from voices, traveling, and camping activity.

Alternative 3 allows additional climbers on guided expeditions which could result in an increase in human generated sounds from additional airplane flights and guided climbers, particularly at the higher camps. This increase is likely since there is demand for additional permits for commercially guided expeditions. However, the limit on the total number of climbers on Mount McKinley during the main climbing season would not change. The adverse impacts of this alternative during the climbing season, relative to existing noise sources experienced by visitors in that area, would be minor and are not expected to degrade the quality of the visitor experience or affect biological resources and would not result in impairment.

SUMMARY

The level of impacts to wilderness and soundscape anticipated from implementing alternative 3 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.