

## Comments

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Denali National Park  
Talkeetna Ranger Station  
July 15, 2005

RECEIVED  
JUL 15 2005  
Talkeetna Ranger Station  
Denali National Park

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 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,

## Response to Comments

AT-1

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

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 Kahiltna Base Camp, southwest fork Kahiltna 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 Tokositna Glacier. NPS provides no legal or factual basis for imposing these landing restrictions.

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.

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

<sup>1</sup> "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.

## 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.

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.

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.

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.

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).

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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

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 Kahiltna Glaciers and the Dunkle Hill/Broad Pass area, it arbitrarily would prohibit scenic air tour landings on the Pika<sup>2</sup> 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

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<sup>2</sup> 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 Kahiltna 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 than that of climbing opportunities.<sup>3</sup> 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.

<sup>3</sup> 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.

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## 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).

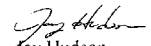
As with Alternative 4, we strongly oppose the distinctions made between air taxi landings and scenic air tour landings. Such distinction is discriminatory in nature and imposes unfair restrictions on visitors (mostly non-climbers) who seek to view the Park, but not sleep there.

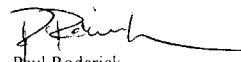
### Conclusion

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

  
Paul Roderick  
Talkeetna Air Taxi

  
Doug Geeting Aviation

  
FLY DENALI, INC.

## Response to Comments

## 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 30<sup>th</sup> 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".

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

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## 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.

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.

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.

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## 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.

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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  
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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 untrammelled 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.

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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.

2

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.

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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 P&P-5.

Bergt-2

See P&P-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 "Alternative2".

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.

4

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.

1

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

### 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.

2

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.

3

### 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 if it 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.

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.

4

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.

5

Al Lovaas, 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

## 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.



## 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 set 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

## Comments

Respectfully Yours,

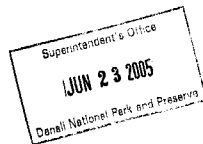
Ruth Colianni  
P.O. Box 198  
Denali Park, AK 99755

## Response to Comments

## 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. Labelling it a Corridor will invite outside hunters who have already badly damaged moose populations on the bigger rivers, as well as

4

## 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.

1

## 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.

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.

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.

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, Livetrapp 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  
Mike 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

1

## 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

F. C. Dean – dena\_bc\_plan\_comment

2

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 eyries, 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 > OP1: "...not accessible to motorized transportation besides from the existing road..." might be used to argue that motorized transport could be used in OP1 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.

7

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?

8

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.

9

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



DENALI NATIONAL PARK  
WILDERNESS CENTERS, LTD.

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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 what the Service considers acceptable over the next twenty years. Backcountry users still experience resource and social conditions that resemble the minimally accepted standards for Management Area B.
  - 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*

## Response to Comments

DNPWC-1

See DCC-34.

503

1

## 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".)

## Response to Comments

## 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 58) 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 Murie 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

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.

2

### 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.

3

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 BCDMP, page 57)

4

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

#### 1. *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

- |    |  |   |
|----|--|---|
| 2. | <i>On-trail vs. off-trail hiking</i><br>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.  | 7 |
| 3. | <i>What constitutes a trail</i><br>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.  |   |
| 4. | <i>Maximum of twelve participants including a guide</i><br>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 <i>seasonal average</i> of twelve participants including a guide for the following reasons: | 8 |
- 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

#### 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.

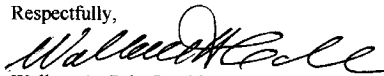
## Comments

- 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 DCMP, 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,



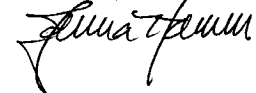
Wallace A. Cole, President

Simon Hamm, Vice President, General Manager



Jerryne Cole, Vice President

Jenna Hamm, Vice President



## Response to Comments

## Comments



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 cases 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  
 [REDACTED]

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

## Response to Comments

Haber-2

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.

2

## 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



July 15, 2005

Mr. Paul Anderson  
Superintendent  
Denali National Park  
P.O. Box 9  
Denali Park, AK 99755

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.



Denali National Park  
Talkeetna Ranger Station  
JUL 15 2005  
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537

1

## 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 deeply 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 Pika 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.

## Comments

to Management Area A. All the landing traffic would be funneled to the Ruth Glacier.

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?

5

### 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.

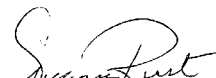
Our Concern:

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

  
Suzanne Rust

Denali National Park  
Talkeetna Ranger Station  
JUL 15 2005  
RECEIVED

## Response to Comments

K2-5

See AT-10.

## Comments

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  
[DENA\\_BC\\_Plan\\_Comments@nps.gov](mailto:DENA_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

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.

2

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).

3

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.

4

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

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McMillion, 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](mailto: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

Strassenburgh-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.

Strassenburgh-2

See NPCA-1.

Strassenburgh-3

See PFP-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.

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.

4

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

1/6/05  
COMMENT TO BACKCOUNTRY PLAN

1  
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 BUTTRESS ROUTE. ONE PASS THROUGH FLIGHTS IN TRANSIT DON'T INVADE OUR MINDS THE WAY CIRCULATE 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 EARSPLITTING 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 PERSERVE.

## Response to Comments

Tejas-1

The upper elevations of Mount McKinley are within the West Buttress 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 TYRANNY 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 (7:45AM) 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 17,200 FT. 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 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 let the wilderness pass you by, have everything "fed" to you in a program with as many people as can be crammed into one vehicle and 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 DCP 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 human encounters and high levels of sound disturbances.

Supintendent's Office  
JUL 13 2005  
Denali National Park and Preserve

## Response to Comments

Turnbull-1

See DCC-36.

Turnbull-2

See DCC-5 and DCC-22.

1

2



## 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 1/6<sup>th</sup>. Alternative #4 allows for too much scenic landing and too high of levels of sound disturbances.

'ap 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.

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.

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 its presence in Denali.

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 Eielson, 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 Kantishna buses and 2 VTS buses, there were possibly more than 500 people fighting to see that bear. That does not constitute a wilderness experience.

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, Kantishna 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.

ipulate 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

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.

Continue the policy of no formal trails in the backcountry. Trails should only be constructed to avoid impairment. All trails should undergo 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".

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 flyovers 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.

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.

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 rect 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 P&P-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 experience 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 *1065 Cumberland St. Paul, MN 55117*  
*P.O. Box 943 Denali Park AK 99755*

National Outdoor Leadership School. Leave No Trace Outdoor Skills and Ethics – Alaska Tundra

National Park Service <http://www.nps.gov/legacy/mission.html> *UTS Sharon Parker Sharon Parker 1 yr phdncs*

McNeil River <http://www.wildlife.alaska.gov/mcneil/mr-what-is.cfm>

Nicholas Weaver *Nicholas Weaver* 1 year Park Rd driver

Mary Rasmussen *Mary Rasmussen* 5 years Park Rd Driver

Barr Gray *Barr Gray* 6 years park road driver

Susan Adams *Susan Adams* 2 years Interpretation

Mike Dyas *Mike Dyas* 15 yrs Driver UTS

Rob Tourtelot *Rob Tourtelot* turtleisle.com 24 yrs Tour driver

Joe Frank *Joe Frank* 2 yr driver  
*Nancy Seeg* 5 yr country driver

Scott Johnson *Scott Johnson* 13 years park road driver

Marsha Anderson *Marsha Anderson* 13 yr park road driver

Thomas (Buster) McNeil *Thomas McNeil* 18 years Alaskan home steader

Christina Valvo Hellner *Christina Valvo Hellner* 6 years bus mechanic/land owner

Wade Hellner *Wade Hellner* visitor 7/14/05

Scott Hinkel *Scott Hinkel* visitor 7/14/05

Leely Kinney *Leely Kinney* visitor 7/14/05

Barbara Mimitz *Barbara Mimitz* visitor 7/14/05

Carah Mimitz *Carah Mimitz* visitor 7/14/05

Engen Korp - *Engen Korp* visitor 7-14-05

Erinne Parks *Erinne Parks* visitor 7/14/05

Walter Rucklshdt *Walter Rucklshdt* 7/18/05

Sue Kinsay *Sue Kinsay* visitor 7/18/05

Ellen Stevens *Ellen Stevens* visitor 7/18/05

## Response to Comments

### Turnbull-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.

1

2

## 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 only 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,

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 thats 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 accomodates 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 reasources 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

## 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.