

## Briefing Statement

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Agency: National Park Service (NPS)  
Unit: Denali National Park and Preserve, Alaska  
Issue: Kantishna Ineligible Wilderness Boundary Adjustment  
Date: April 2019  
Intended Audience: Public

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### Background

Denali National Park's 1986 General Management Plan (GMP) states that the Kantishna Mining District (also Kantishna mining district) was found unsuitable for eligible wilderness designation because of its disturbance to the landscape by mining and the road system<sup>i</sup>.

The GMP guidance for areas unsuitable for eligible wilderness designation include: areas with major ground disturbance from past mining activity, areas with current mining activity and ground disturbance, and improved roads and off-road vehicle trails regularly used by motor vehicles<sup>ii</sup>.

The term "district" was used historically for mining administration purposes. The mining district encompassed the Kantishna Hills region where mining activity took place. Determination of Eligibility (DOE) for the Kantishna Mining District was completed in 1993 but did not account for all the mining land and structural resources in the Kantishna Region. After the DOE was complete, there were several incomplete efforts to get Kantishna mining resources listed on the National Register of Historic Places. The Kantishna mining district geographical information system (GIS) layer, used to define the district for modern mapping purposes, was ultimately derived from the combination of a Cultural Landscape Inventory and natural features (topo lines, streams).

The existing ineligible wilderness boundary GIS layer, based on the Kantishna mining district GIS layer, was updated in 2015 as part of an Alaska-wide NPS effort. It omits portions of Slate Creek where mining occurred, and sections of both the Eldorado and Moose Creek mining access routes. No known documentation exists to show that this was intentional.

### The Purpose and Need

Some areas currently listed as ineligible by GMP guidance are shown within eligible wilderness on park maps. This complicates management of these areas. Specifically this includes the Moose Creek and Eldorado access routes and the contaminated Slate Creek antimony mining site.

The Denali Management Team recognizes that there is continued interest in the Kantishna area for stream reclamation, recreational opportunities, and commercial development and therefore determined the need to clarify the ineligible wilderness boundary.

Discussion on how to more accurately reflect guidance in the 1986 GMP included park management, park planning and cultural staff, and regional NPS wilderness staff and NEPA staff.

Two solutions were proposed:

1. Complete an eligibility reassessment with the region to include other impacted areas (Slate Creek, Eldorado Creek, and Moose Creek) and document that NPS is deviating from guidance in the GMP to follow the Kantishna Mining District. The resulting document would be signed by the regional director and the NPS Director, and a notice listed in the federal registrar.
2. Be thoughtful about what the Kantishna Mining District is based on the 1986 GMP guidance, change the GIS layer accordingly, and then notify the regional office. Document this update as a memo to file to the 1986 GMP.

### Decision File

The Denali Management Team approved option #2, the revision of the Kantishna mining district and notification to the region that this change has occurred, at a Compliance Meeting on December 11th of 2018.

Amendments to the Kantishna Mining District and ineligible wilderness boundary enacted through this memo to file for the 1986 GMP are as follows:

- Adjust the southern ineligible wilderness boundary to 50' from centerline of the most southern route of Moose Creek access route instead of Moose Creek proper. This distance is what the Alaska Omnibus Act of 1959 set aside for mining roads similar in character, such as the State of Alaska owned Colorado Bull River Road within the park near Cantwell. Some variation occurs from this standard width at areas where the previous alignment of the historic district is further than the 50' from centerline of the access route. This variation retains previously identified cultural resources within the historic district.
- Incorporate the full Eldorado Creek access route by extending the width of former or existing claims boundaries the length of the creek to the point where it meets Slate Creek.
- Include the Slate Creek antimony mine site and impacted area by extending the width of former or existing claims on Eldorado and Slate Creeks the length of Slate Creek. A minor variation occurs from this standard width at the head of Slate Creek to ensure the impacted area is wholly included.

From these actions, a total of 391 acres will be correctly identified as ineligible wilderness and a total of 24 acres will be correctly identified as ineligible wilderness.

Note that NPS decided against including the Jauhola cabin access route and site because mining impacts were minimal, the route is currently impassible, and the area has largely been reclaimed by vegetation.

This process looked at the history of use in the Kantishna area and did not take into account projects on the horizon when considering what should be identified as ineligible wilderness per language in 1986 GMP.

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<sup>i</sup> National Park Service, April 1986, Denali National Park and Preserve General Management Plan, pages iv, 110.

<sup>ii</sup> National Park Service, April 1986, Denali National Park and Preserve General Management Plan, page 109.