



Since 1974

May 30, 2003

Dear Superintendent Anderson,

On behalf of the Board and members of Denali Citizens Council (DCC), thank you for this opportunity to comment on the Draft Denali Backcountry Management Plan. Many of our approximately 200 members live and work near Denali National Park and have a direct, personal stake in the provisions of this plan. All of our members favor maintaining Denali's natural integrity and wilderness character. DCC's founders actively supported increasing the size of Denali National Park and Preserve through the Alaska National Interest Lands Conservation Act (ANILCA) of 1980. We continue to support the purpose for adding these 4 million acres – maintenance of an intact ecosystem including the entire Denali mountain massif, and provision of opportunities for wilderness recreational activities. In addition, ANILCA specifies that the northern additions were made for ecosystem protection and protection of subsistence lifestyles. With this intent in mind, backcountry management guidelines for the northern additions should emphasize resource protection and wilderness character.

We recognize the importance of selecting a backcountry management strategy that accurately carries out the intent of legislation and park policy for Denali. We also recognize the importance of maintaining the “National Park difference” when managing Denali's backcountry. The national park service's enabling legislation, the Organic Act, set down this “difference.” It provided for the highest degree of resource protection on Park Service lands, and required that use of these lands must be consistent with protection of resource values. Other public lands did not carry this preservation mandate to such a high degree. It is therefore incumbent upon the National Park Service to provide consistent, unrelenting protection for park resources and wilderness character in an ever changing social, political and technological landscape. Not an easy thing to do, but tremendously important in a world of increasing urbanization, social unrest and resource scarcity.

Because the Plan is complex and multi-faceted, these comments will be lengthy. The major topics are as follows:

- 1. Comments on the Purpose and Need**
- 2. Comments on Actions Common to all Alternatives**
- 3. Comments upon the Preferred Alternative D**
- 4. Our vision of an appropriate Alternative**

1. Comments on the Purpose and Need

A. Need for the Plan

1. *You state (p. 2) that a new plan is needed because existing plans, specifically the 1976 backcountry planning document and the 1986 GMP, need updating. You go on to state that ANILCA created legal mandates for special access that have not been addressed in backcountry planning.*

We agree that prior planning documents require amending and that the mandates of ANILCA must be taken into account. However, although you refer to the mandates of ANILCA, you do not thoroughly address them in the plan. For example, the DEIS is incomplete now and will remain incomplete until the ANILCA term “traditional activities” is defined. Upon this definition rests the entire scope of special access given in section 1110. In addition, the Wilderness identification and designation process mandated by Section 1317 of ANILCA is incomplete. The description of areas for appropriate access for subsistence is incomplete.

A baseline description of the existing park soundscape and objective guidelines for maintenance of unimpaired soundscape are absent from the DEIS. Moreover, management of impacts from new developments in the Front Country, such as the Denali Science and Learning Center, may require another EIS as this center develops its program.

We realize that this plan is one of many plans that amend the 1986 GMP. We commend the plan for its positive language regarding wilderness protection and avoidance of impairment to park resources. The plan will be incomplete, however, until objective measurements for impairment are provided, adequate monitoring and enforcement are specified, and statutory mandates are addressed.

2. *You state that visitation has grown dramatically for some activities, requiring new methods of management. You specify the following increased uses; climbing and mountaineering, aircraft over flights and landings, snowmachine use, hikers and backpackers in the wilderness core of Denali, guided and commercial uses (including a planned Science and Learning Center) in the core and the additions.*

We agree that there has been tremendous growth in the tourism industry, growth that has affected all aspects of management at Denali. In fact, you describe a situation that is already out of control and is already impairing resources in the park. The plan is incomplete until it describes

those areas of the park that are currently impaired and lists strategies for mitigating current impairment and phasing out the damaging activities. Although you state that the BCMP is intended to be proactive, it appears to accept damaging activities such as snowmachining and new scenic air tour landings without really addressing their appropriateness in the first place. This policy of managing existing off-road motorized uses as if they were acceptable is actually reactive, not proactive.

We question the current situation in which NPS has allowed snowmachining in the Park additions for *traditional activities* without defining *traditional activities*. In the rulemaking of 2000 that defined *traditional activities* for the park's Wilderness core, the public gave wide support to a definition that did not include recreational snowmachining and supported closing Denali's 2 million acre core to snowmachining. We wonder why the NPS has made public statements of support for some snowmachining in the park additions, statements that fly in the face of prior NPS policy nationwide. We question this acceptance of snowmachining in Denali's additions.

3. *You state that anticipated increases in additional activities, including off-road biking, non-motorized winter access, use of stock (horses) and motorboat access require guidance.*

We support getting control of the use of pack dogs, horses and bicycles. Specific comments will come later. In addition, the use of motorboats for tourism inside the park is NOT an ANILCA guarantee.

Other important access activities covered under ANILCA include the use of ATVs for subsistence. Under "Actions Considered but not addressed," you state that subsistence guidelines will be developed under a separate Subsistence Plan, in concert with the Denali Subsistence Resource Commission. Until that plan is finalized the BCMP will be incomplete. For effective backcountry management, it is important to understand just where use of ATVs for subsistence occurred prior to ANILCA. That use is guaranteed only if it pre-dated ANILCA.

The National Park Service risks overly permissive interpretation of ANILCA access guidelines by the public and inappropriate modes of access into the park, if it fails to address what constitutes appropriate access under all ANILCA access guidelines. There is no doubt that all forms of motorized access into Denali's backcountry (airplanes, snowmachines and ATVs) are now at levels greater than their levels at the time of ANILCA's passage. This has happened because of unclear guidelines and/or a lack of enforcement personnel or enforcement direction. The development of this plan cannot allow that situation to continue.

4. *You state that changes in backcountry use require action to protect resources (including a more recently identified resource, soundscape) and wilderness character, especially for the additions.*

We support the addition of soundscape as an important resource for backcountry management planning. However, the plan as presented in the Draft EIS does not contain adequate measures of current conditions, objective measures of what constitutes impairment, or guidelines for mitigating existing impairments, as mandated in Director's Order #47.

We also support your strongly worded statements on pp. 29-31 advocating protection of wilderness character. We wonder that you chose as your preferred alternative one that avoids the ANILCA-mandated process of identifying and designating statutory Wilderness in the additions as a priority first step in this plan.

1. Comments on Purpose and Need

B. Management Goals of the Plan (p. 8)

On page 8 of the plan you list management goals as follows.

1. *Plan actions should protect and preserve the park's natural and cultural resources and values, and wilderness resource values, including natural soundscapes and intangible values such as solitude.*

We commend you for stating the need to preserve resources and for establishing soundscape as an important natural resource. See our comments under #4 above.

2. *Plan actions should provide for the public's maximum freedom of use and enjoyment of the park's backcountry and wilderness in a manner that is consistent with park purposes and the protection of park resources and values.*

We take issue with the *maximum freedom of use and enjoyment* phrase. The statement is open to a variety of interpretations, and could be interpreted as emphasizing access for recreation over protection of resources. This is the first time that *maximum freedom language* has been used in the backcountry planning process.

3. *Plan actions should define the recreational opportunities provided in Denali's backcountry in the context of a spectrum of recreational opportunities available on public lands in*

the Denali region (including state parks, other state lands, and federal Bureau of Land Management lands)

We support this spectrum concept. Clearly the National Parks exist on the more restrictive, preservationist end of that spectrum. We are glad to see this language in the plan and we would expect to see a preferred alternative that emphasizes only those recreational opportunities that support the wilderness character of the park.

4. Plan actions should ensure all NPS management practices and research in the backcountry are consistent with park purposes.

The plan identifies the minimum requirement process for determining if park actions are consistent with park purposes. We support this concept.

While the use of aircraft for management and research is essential in a largely roadless Park, we urge the NPS to carefully limit the use of helicopters and airplanes for research.

5. Plan actions should provide for the means to achieve public understanding and support of backcountry and wilderness values.

We believe that the best way to achieve an understanding of wilderness values is to maintain an unimpaired, wild park. We look forward to the development of the Science and Learning Center, and its services to all visitors, including many who may not be able or have time to hike in the backcountry. Still, the most important teaching in a national park occurs one on one between an individual and the environment. Protecting wilderness recreation through limiting the size of group outings (maximum of 12 or even less if impacts are noted) and teaching respectful practices to backcountry hikers is important. Visitors benefit most from encountering the park on its own terms, weather, rugged terrain, no sugar coating.

2. Comments on Actions Common to All Alternatives

A. Establishment of Management Zones

Backcountry Zone – The conditions that you describe for this zone should not be encountered in any national park backcountry. **The encounter rate of 10 parties (of up to 12 people) per day is too great.** This zone is incorporated into your snowmachine map as the area of concentrated activity with corridors. Under this scenario, over a hundred snowmachines are possible along these corridors. For hikers, this encounter rate is unacceptably high as well. Such high levels of use will very likely damage the soundscape in the case of snowmachines and could be

damaging to the landscape in the case of hikers. There should be no area in the park except perhaps the entrance area where there are more than five encounters with another hiking party. We advocate the elimination of the *Backcountry Zone* as currently described.

Natural Zone – Encounter rate of three parties per week is appropriate for most of the park additions except heavily visited mountaineering zones and those zones immediately adjacent to Kantishna. We advocate that the entire northern additions, except for zones close to Kantishna, and perhaps that part of Zone 61 closest to the Parks Highway, be managed as *Natural Zones*

Primitive Zone – Encounter rate of two parties per day. This designation works in the Old Park (see below) and may be appropriate for managing areas of the additions that are adjacent to the Parks Highway such as that part of Zone 61 that is close to Healy and that part of 70 that is close to Cantwell. However, all areas that are accessible only by airplane should be classified for management as *Natural Zones*. This will tend to cap the development of air taxi tourism at levels less likely to result in impairment of wilderness character.

Old Park Special Resource – Encounters of up to two parties per day are reasonable in areas of Denali that are adjacent to the park road in the Old Park Special Resource Area. West of the Muddy River, however, the encounter rate of two per day is an unrealistic number. This area west of the Muddy is best represented as a *Natural Zone*. We advocate no airplane landings in the Old Park, an action common to all Alternatives except E. The western Old Park, Units 21 and 22, will have access for backpacking mainly from airstrips outside the park in other areas marked Natural. For consistency, this area is best managed as a *Natural Zone*.

Portal Areas- A higher encounter rate, up to 10 parties per day, is tolerated in these areas, which represent landing zones for mountaineering access. Because of likely damage to the soundscape from seasonally frequent air activity, we believe that all other landings beside those required to drop off hikers and climbers should be severely limited or prohibited. This means that scenic air tour landings in some areas may need reducing or phasing out, in order to protect the resource values of those areas.

Backcountry Day Use area – Adjacent to the Park Road, occupying a 1/2 mile wide strip on each side of the road. Encounter rate of 10 parties per day is tolerated because of nearness to road. This area represents the interface between the Frontcountry and the Backcountry in Old Denali. Much of this area is within the Old Park Wilderness. We understand the need to depict this area realistically, and the value that this area has for interpretation of the park for visitors who do not have the time or ability to travel more deeply into the backcountry. However, the plan is incomplete in addressing how continued impairment will be avoided for this area, especially since

the road has not yet reached regulatory capacity and new activities through the Denali Science and Learning Center can be expected. We would like the final BCMP EIS to show a map depicting this area and to discuss more thoroughly what plans have been made for mitigation of impacts on tundra, wildlife and soundscape there. In addition, we advocate a cap on all hiking parties at 12, not the 15 person cap advocated in the plan for this area.

Hiker Area – In the original 1986 GMP Denali was described as a park without trails. However, constructed trails have turned up. The Hiker area was first described in the 1997 Front Country EIS to describe this inevitable result of increased visitation. We would like to see a listing of these trails in the Final BCMP EIS. The NPS should provide some information in the Final EIS regarding the rationale for constructing trails and the process by which a decision is made to do so.

B. Pack Animals

We support closure of the park to pack animals except perhaps for constructed mining routes in Kantishna. However, conflicts with hikers can occur on these routes, and numbers of horses should be limited. Although horses were a traditional mode of exploration and access into Denali, their use for tourism day after day in the same area, even on a “constructed mining route,” will damage the ground cover and spread non-Native plants. Many of the “constructed mining routes” are little more than wide tracks, and they traverse a variety of ground types, not all of which are “durable” and able to withstand the pounding of horses’ hoofs over a season. We believe that general use of horses on these routes is inappropriate. At the very least, the routes used should be specifically identified, and most routes reserved for hiking only.

C. Bicycles

Use of bicycles off the main Denali road is inappropriate. Perhaps one mining route per summer could be allowed for their use, but allowing the use of bicycles on all “constructed mining access routes” is too vague and will result in inappropriate damage to wetlands and user conflicts with hikers. Kantishna should remain a wilderness tourism destination, with multiple hiking opportunities with minimal user conflicts. There are already potential conflicts between hikers and individuals using motor vehicles for access to inholdings.

D. Dog mushing

This traditional form of winter access is allowed in the wilderness core and should continue to be allowed in core and additions, with mandatory registration, and subject to the regulations you

suggest. Permitting with limits may be necessary in certain locations. The spread of disease through dogs to and from wild animals is a danger that must be considered and addressed.

3. Comments on Preferred Alternative D

We have already suggested several needed changes to the BCMP Draft Plan in order to make it more complete and more in line with park policy. In summary, they are:

- Define *traditional activities* for the park additions (we support the existing definition for Denali's core Wilderness). We support the same definition in the additions as in the core Wilderness Park.
- Reconsider widespread authorization of recreational snowmachining in Denali's additions. Currently usage has not been subjected to public rulemaking and is not supported by prior park policy, federal regulations, or executive orders. The superintendent has statutory authority to limit this use in the Park additions through Directors Order 11644, even in times of adequate snow cover.
- Provide objective baseline measures for desired park soundscape, objective measures of what constitutes impairment, realistic monitoring strategies and guidelines for mitigating existing damage and preventing future damage.
- Complete Wilderness identification and designation process mandated by ANILCA Section 1317.
- Prevent degradation of resources by eliminating the Backcountry Management Zone (red).
- Limit or prohibit scenic air tour landings in Portal Areas and in the North additions.
- Manage Denali's North additions for wilderness character and ecosystem protection. All units except those adjacent to Kantishna and perhaps that part of 61 close to the Parks Highway should be classified as *Natural Zones*.
- Classify the units in the Wilderness Core of Denali West of Wonder Lake as *Natural Zones*.

Below, we continue some more specific comments on Alternative D.

A. We support prohibiting all airplane landings in the Old Park, except for emergencies and essential administrative activities.

We support this closure and believe it to be a true reflection of the intent of ANILCA when Old Denali was designated a Wilderness area. Access for hiking in the Western part of the Old Park

can be made from outside the park. Airplane landings, except for emergencies, will detract from the solitude and Wilderness character known to exist in this area.

B. Alternative D undermines the stated goals of the BCMP by encouraging increased impacts from Scenic Air Tours.

In the Wilderness Management section, pp. 29-31, you state that NPS would forgo any actions that might detract from wilderness character. In addition, Directors Order #47 for soundscape instructs you to avoid impairment of the natural soundscape. **In Alternative D, however, scenic air tour landings in several units south of the Alaska Range and in eight units north of the Alaska Range, are allowed.** The NPS should remove all scenic air tour landings from the north side of the park, and should limit them on the south side. This would not eliminate landings for dropping off overnight hikers, nor would it limit strictly airborne tours. Scenic tour landings have not become established in the north additions, and there is no reason to encourage this use.

Alternative D also places no caps on scenic landings on already heavily visited portal areas south of the Alaska Range. **These caps should exist.**

We also suggest that mandatory registration by air taxis and private pilots who plan to land in the park be established. **This monitoring approach** will help to determine where the greatest impacts might be, and to determine whether the various zones are being are meeting their goals.

C. The Backcountry Management Zone should be eliminated from Alternative D.

This management strategy is too likely to cause impairment and degradation of wilderness character. **The NPS has committed to manage the additions to retain their suitability for Wilderness designation.** This zone is likely to result in significant enough degradation of wilderness character to render areas where it is applied unsuitable for designation as Wilderness. The NPS legally cannot make a decision that will result in unsuitability until final recommendations have been made.

D. Alternative D encourages an unprecedented degree of snowmachine activity in the Park additions.

We wonder why over 50% of the Park additions have been subjected to either dispersed or concentrated use by snowmachines for recreation. This amount is in excess of special access guarantees in ANILCA.

By opening units 70 and 83 to concentrated use (red color), you are virtually eliminating their suitability for Wilderness designation. Not only that, in Unit 83, you are encouraging new

recreational snowmachine use at concentrations that could conflict with this area's purposes as a wildlife preserve.

We wonder why Alternative D advocates dispersed use of snowmachines in close to 50% of the park additions. Dispersed use (no corridors or roadways) runs counter to existing regulations at 36 CFR 2.18. In addition, the difficulty in monitoring levels of use and the certainty that incremental increases in use will occur over the years, makes this strategy very questionable. The rulemaking that you must do to allow this type of use is questionable at best and runs counter to NPS policies not only in Alaska but in the lower 48. **Your unwillingness to define *traditional activities* further confuses the access issue and blunts the intent of ANILCA. Your permissive attitude toward snowmachining sets a precedent for other Alaska parks as well.**

E. Alternative D allows dispersed use of snowmachines on glaciers despite known safety concerns.

The NPS itself has determined that snowmachining on glaciers is unsafe. In addition, the presence of high walled glacial valleys and the existing use of scenic tour landings and mountaineering access portals on glaciers have already compromised the natural soundscape. Adding additional noise impacts from snowmachines will violate the stipulations of Director's Order #47 and compromises the wilderness character of the glacial valleys south of Denali.

F. A visitor contact center at Broad Pass, under Alternative D, could be useful, but need not promote snowmachining in the park.

This cooperative activity could also serve summer visitors and would provide interagency cooperation in managing snowmachine access in the Broad Pass/Cantwell/Denali Highway area, including monitoring efforts and education regarding appropriate behaviors and avoidance of user conflicts.

G. Alternative D accepts the construction of certain trails in high use areas. This major departure from the 1986 GMP reflects the **incremental changes that come when visitation increases.**

Although we do not necessarily oppose the trail building proposed in Alternative D, we also support the basic premise of a trail-less park. It is incumbent upon the NPS to support a balance between use and preservation that will limit the incremental damage that makes trail building necessary. The inevitability of an ever increasing population of visitors requires setting caps on

recreational uses and encouraging advance planning in order to experience this precious but fragile resource.

H. Alternative D does not go far enough in advancing the purposes of the northern additions.

The northern additions were added to Denali for protection of subsistence and wildlife habitat. Alternative D allows new uses and encounter rates that overemphasize recreational development and motorized uses over the preservation mandate. The lands in the park that are most suitable for Wilderness designation are in the northern additions. Alternative D, and in fact all of the alternatives, make no suggestions for Wilderness designations in any of the additions.

I. Alternative D emphasizes many new recreational activities without providing assurance that monitoring and enforcement will be adequate.

NPS should take a precautionary approach in allowing increased uses when there is already impairment, and funds for additional monitoring and enforcement are scarce. Alternative D moves too fast with new uses. Alternative D will create great need for enforcement personnel and management. Will it be an under-funded mandate?

4. Comments on an Alternative that best meets the management goals of the plan and realizes the “National Park difference.”

A. We support an alternative that addresses the ANILCA Section 1317 mandate for Wilderness recommendation prior to introduction of increased recreational uses with unknown impacts to Wilderness suitability. The NPS Alternative B addresses these designations as a first priority.

B. We believe that the NPS would provide better balance in this plan by recommending some areas of the additions as prime candidates for Wilderness designation (whenever that process is initiated). In the northern additions, the Kantishna Hills massif and associated lowlands in units 40, 64, 63 and 62 contain unique non-glacial geology, abundant wildlife and flora, and valuable cultural resources. We urge the NPS, in any alternative, to manage these lands as prime candidates for Wilderness designation.

C. We support an alternative that protects the northern additions of Denali by designating them *Natural* (except near Kantishna and the Parks Highway) and by prohibiting scenic air tour landings. We understand that such landings already occur to a degree in Kantishna and general aviation is permitted. An increase in scenic tour landings is not warranted and they are damaging to natural quiet and the sense of solitude that someone on the ground might be experiencing. Alternative B comes closest to espousing this scenario, although even in Alternative B, not all the units in the North additions are *Natural*.

D. We support an alternative that mandates only very limited access for snowmachines in National Parks, according to the special access guidelines of ANILCA. NPS should apply the definition of *traditional activities* promulgated for the core Wilderness of Denali to the additions. Under this definition, snowmachining for recreation is not a permitted National Park activity.

Snowmachining for recreation is allowed on other public lands near Denali, and in most of south-central Alaska. We believe that National Parks must restrict off-road motorized activities in order to comply with their longstanding policies and legislative mandates. These policies came into existence to preserve lands that support primitive recreation and wilderness character. Recreational snowmachining, as it is practiced in modern Alaska, and as it will develop with changing technologies over the years, is not primitive, wilderness recreation.

Alternative B comes closest to our vision of what should be happening regarding snowmachines, although it does not support defining *traditional activities* for the additions.

E. We support the caps on scenic air tour landings in Alternative B and we support placing caps on mountaineering permits for Denali, as advocated in Alternatives B and C.

The mission of DCC has always been to advocate for the natural integrity of Denali National Park and Preserve. We urge you to develop a Backcountry Management Plan that emphasizes protection of all those resources that make our Park special. Denali is first and foremost a wilderness and a sanctuary for living systems, systems that benefit most from minimum intervention by humans. Recreation is an important value, but must be secondary to protection of this vast sub arctic ecosystem.

We appreciate the opportunity to provide comments. Thank you for the many opportunities for discussion and clarification of this plan that you have provided to the public. We look forward to remaining involved with you as you develop a final plan. Please visit our website at www.denalicitizens.org, if you have any questions about our organization.

Sincerely,

/s/

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