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August 17, 1995

Steve Martin, Superintendent
Denali National Park and Preserve
P. O. Box 9
Denali Park, Alaska 99755

Dear Mr. Martin:

The State of Alaska has completed its review of the draft Statement for Management for Denali National Park and Preserve. This letter represents the consolidated comments of the State's resource agencies.

This draft Statement for Management is a great improvement over the preliminary draft we reviewed earlier. We appreciate that most of our previous comments have been satisfactorily addressed. In particular, we are pleased to see the following modifications:


- * addition of a specific objective to document pre-ANILCA activities;
- * improved recognition of the value and necessity of working with state agencies, particularly the Alaska Department of Fish and Game;
- * expansion of the Land Protection Plan discussion beyond land acquisition;, and
- * commitment to ANILCA training for employees.

We have a few remaining comments which have not yet been addressed or that have arisen following the development of this draft document. To expedite your consideration, these comments are attached as annotated pages from the draft document.

In closing, the State commends your efforts to improve the NPS's consultation with the State and other interested parties in the seeming tidal wave of Denali planning and management issues. While these efforts have been laudible, we request that you not lose sight of some of the lesser profile issues facing the park. In particular, we encourage you and park's subsistence staff to continue developing a productive working relationship with the Denali Subsistence Resource Commission. Subsistence concerns are intertwined throughout most of the park's frontburner projects and the SRC deserves an active role along the way.

Thank you for the opportunity to review the draft Denali Statement for Management. If you have any questions about these remaining comments, please call me at 269-7477.

Sincerely,



Sally Gibert
State CSU Coordinator

cc: Nancy Swanton, Anchorage
Mike Tranel, Denali Park

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Tina Cuning, DFG-Anch
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DGC-Juneau reading file



Issue	Objective/Strategy
Public Relations and Information Dispersal	Effectively gather, analyze, and disperse accurate and complete information for management decisions and establish a proactive public relations program.
Cooperation with Others	Promote a dialogue with other public agencies, Native corporations, private organizations, and individuals that fosters cooperative, ecosystem-based regional land use planning and decision making that will address individual interests and avoid or mitigate adverse impacts on park resources.
Resource Inventory and Monitoring and Ecosystem Protection	Collect baseline and long-term monitoring information necessary to document ecosystem conditions and to assess natural and human-caused changes to biodiversity, species and habitat distribution and condition, population dynamics, and ecosystem processes. Continue park resource inventory and monitoring projects focused on critical management issues. Document pre-ANILCA activities in ANILCA additions to the park.
Subsistence Management and Wildlife Consumptive Use	Work with the Denali Subsistence Resource Commission to develop a subsistence management plan and provide for consumptive uses of resources where legally authorized while protecting the integrity of Denali's fish and wildlife resources. Cooperate with the Alaska Department of Fish and Game, other agencies, advisory groups, and local users to manage hunting and fishing in the preserve.
Cultural Resources Protection	Identify, preserve, and interpret cultural resources in the park as outlined in the draft resource management plan. Develop a comprehensive cultural resource management program for Denali.
Land Protection/ Kantishna Area	Protect park lands through acquisition of inholdings when necessary, cooperative agreements with inholders, and other methods such as conservation easements. Continue acquiring patented and unpatented mining claims in the park additions (especially in the Kantishna area) and implement administrative changes in the process to increase overall efficiency and effectiveness for land purchases. <i>Update the LPP.</i>
Interpretation and Information Services	Identify visitor needs and develop new interpretive facilities, media, and programs to meet them. Improve the quality and effectiveness of existing programs. Improve the partnership with park concessioners and the Alaska Railroad to deliver interpretive services to bus and railroad passengers. Plan for and provide accessible facilities, programs, and media for special populations. Amend the 1990 "Interpretive Prospectus" and the 1993 "Wayside Exhibit Proposal" as needed, and develop an informational sign plan.

- **Plant life:** Denali contains outstanding examples of subarctic plant communities. Only plants that have adapted to long, bitterly cold winters can survive in the various plant communities in the park. Even with these extreme conditions, over 650 species of flowering plants inhabit the slopes and valleys of the park. Denali offers extensive opportunities to observe tundra plant life in a natural setting.

- **Air Quality and Scenic Resources:** The exceptional air quality in Alaska and the lack of city lights near the park provide the conditions for outstanding day-time views and excellent night sky visibility in fall and winter. On a clear day, Mt. McKinley can be seen from Anchorage, over 130 air miles to the south. Denali National Park is a designated Class I airshed. Outstanding views of natural features, including mountains, glaciers, faulting, and other geological processes dominate the park landscape. The lower southern slopes of the Alaska Range are steep between glaciers, containing some spectacular lower elevation walls, spires, and peaks. Views of Mt. McKinley from the south are much different than the classic views from the north side, offering alternative but equally impressive viewing opportunities at certain locations on the south side.

- **Cultural Resources:** There are over 180 known cultural sites and complexes located within Denali's boundaries, many of which are listed on the National Register of Historic Places. Because cultural resource inventories have been limited to date, this number most likely represents a fraction of the total sites contained in the park. Known resources include archeological and historical sites associated with Athabaskan Indian groups, early explorers, mining history, and the early days of the park. Major prehistoric sites in the park include the Teklanika Archeological District, a property listed on the National Register of Historic Places. Numerous historic structures are found in the park headquarters area (a national historic district), along the main park road, and on the boundaries of the Denali Wilderness (along the original park boundary). These are mainly patrol cabins and other structures dating back to early years of park management, mines, and related mining structures. Historic mining activity dates back to 1903 in the Kantishna Hills (which includes the Kantishna Historic District), the Stampede area, and the Dunkle Hills near Cantwell.

- **Access and Tourism:** A convergence of factors puts Denali among the most popular visitor destinations in Alaska, and makes it a symbol of what Alaska offers. The Alaska Railroad links the park with Anchorage, Fairbanks, and the ports of Whittier and Seward, a direct access route that is unique among the national parks in Alaska. The railroad also links Denali to major international package tours that carry visitors by ship, bus, rail, and air in a circle route generally running from Seattle, through Interior Alaska, and back. The George Parks Highway roughly parallels the railroad, and provides similar access for both out-of-state visitors and residents. Most visitors to Denali want to travel the 90-mile road into the heart of the park. The mountain, wildlife viewing, and park road experience are broadly marketed as a "must do" adventure. The park road is, therefore, a significant visitor use resource, offering an experience distinctively different from that found in typical national parks in the lower 48. It offers a unique bus trip that is rustic and that transports people through a narrow corridor into the wilderness, containing prime wildlife viewing areas unlike any other.

- **Mountaineering:** Because it is the highest peak in North America, has a high northern latitude location, and is relatively accessible, Mt. McKinley is considered one of the world's

all or
a portion
of

(as written, this implies most people go all the way in)

LEGISLATIVE AND ADMINISTRATIVE REQUIREMENTS

The following legislative and administrative requirements for Denali provide further guidance on how the park should be managed. Park-specific requirements and some major constraints related to all parks established or enlarged through ANILCA are included. Legislative and administrative requirements vary somewhat among the three legislatively authorized units: the Denali wilderness (former Mount McKinley National Park), the park additions of 1980, and the preserve additions of 1980.

ANILCA directs that the park/preserve lands be administered "pursuant to the provisions of the Act of August 25, 1916 (39 Stat. 535)" which created the National Park Service (the NPS organic act), subject to the provisions of ANILCA.

Congress also stipulated certain objectives for the park additions and the preserve that are not found in most other parks. In the park additions, traditional subsistence harvests are authorized and in the preserve both subsistence and sport harvests are permitted. Even these uses, however, must occur within the context of managing the areas for natural values. Except for allowing hunting and trapping national preserves are to be managed exactly as the national parks.

ANILCA (Section 701) designated most of the former Mount McKinley National Park as a wilderness under the Wilderness Act of 1964 (78 Stat. 892). See the park/region map for wilderness area boundaries and appendix B for additional information on the Wilderness Act.

Section 1306 authorizes the Park Service to locate administrative and visitor facilities within or outside the park. It also encourages the use of Native lands in the vicinity of the park for these facilities.

Note: ANILCA changes to Alaska wilderness existence of

Section 1307 permits commercial visitor services that existed prior to 1979 to continue. It also provides a preference for Native corporations and local residents in establishing new visitor services.

Section 1308 establishes a program to encourage hiring local residents with special knowledge and expertise concerning the natural and cultural resources of the park.

Section 1317(a) directed that a wilderness suitability review be made for all nonwilderness lands in Denali. That study revealed that roughly 3.9 million additional acres were potentially suitable for designation. A Wilderness Recommendation report was completed in 1988 and forwarded to the Secretary of the Interior, but no final decision was made nor was any action taken by Congress. The Park Service proposed the designation of 2,254,000 acres (about 60 percent of the park's wilderness suitable lands) as wilderness. Per NPS Management Policies and Special Directives, all lands that are suitable for wilderness will be managed as wilderness until Congress acts on the issue.

technology is now available in the park. While this information is critical to managing the park's minerals program, it is limited in geographic scope.

More recent data development efforts have occurred for the "Draft South Slope Development Concept Plan" (land cover map), the "National Biological Service Grizzly Bear Study" (bear observations), the Servicewide Baseline Water Quality Inventory and Analysis Project (hydrography, gage locations, and discharge locations), and the Servicewide Inventory Program (base cartography).

SOCIOLOGICAL DATA

A visitor survey was conducted for Denali in 1988 by Dr. Gary Machlis of the University of Idaho. It assessed visitor characteristics, activities, expenditures, wildlife sightings, and satisfaction levels with services such as transportation and lodging in the park. The survey needs to be updated with more targeted sociological studies to assess visitor expectations, satisfaction levels, and needs, especially for the frontcountry/road corridor area of the park.

SUBSISTENCE USE DATA

references cited in this section should be included in the bibliography.

Subsistence resource data exist in a variety of forms ranging from annual harvest report information to specific community and geographic area subsistence use studies. The northern additions to Denali has been the focus for most subsistence use studies because of its long-term, consistent pattern of subsistence use. Examples of more complete studies include: Subsistence Resource Use in the Proposed North Additions to Mt. McKinley National Park (1978), Land Use in the North Additions of Denali National Park (1984), Native Place Names of the Kantishna Drainage (1991), and Customary and Traditional Use of Cabins and Other Shelters Associated with Subsistence Use in the North Additions of Denali National Park and Preserve (in press).

Subsistence baseline data is often found as a component to other cultural studies such as: A History of Denali (1991), Overview and Assessment of Archeological Resources (1990), Alaska Department of Fish and Game Subsistence Community Profile Database (1982, 1984, 1987), the Ethnohistory of Four Alaskan Waterbodies (1979), and Denali Oral History Project (in progress).

Further information can be found through state and National Park Service subsistence harvest records, sealing documents, registration permits, and the Denali Subsistence Resource Commission records. With such a range and variety of subsistence resource information, which is often gathered in the short term and unrelated to other work in progress, it is difficult to formulate into a long-term, consistent database for subsistence management. There is further need for an ethnography study for Denali that would expand on the oral history, and a subsistence use study that would address the southern additions to the park.

then DFG can determine whether their "Subsistence Community Profile Data Base (1982, 1984, 1987)" entries represent all the information compiled for park area communities.

MANAGEMENT ZONING AND LAND STATUS

The 1986 GMP zoned Denali National Park and Preserve to identify a different management emphasis for certain areas of the park and to guide more detailed planning and management decisions. The land ownership and use adjacent to the park is also critical to the management of Denali, because resource and visitor management issues often cannot be resolved without coordination and cooperation with park neighbors.

LAND WITHIN THE PARK

Park lands are administered under four zoning classifications described in the 1986 GMP. These classifications provide general guidance on how different areas in the park are managed (see Management Zoning map). The strategies identified to address selected management issues that are outlined in the Future Direction section of this document must be consistent with these prescriptions unless the GMP is amended.

Natural Zone

The majority of the park is in the natural zone, which is managed to protect natural resources, processes, and habitat for wildlife, and to provide opportunities for recreational activities. These lands are managed to ensure that natural processes prevail. Portions of the natural zone are managed according to different legislative mandates. These include:

Park Wilderness. The designated wilderness is basically the area of the previous Mount McKinley National Park. The flora and fauna of this area are given almost complete protection from human intrusions, and it is managed according to the 1964 Wilderness Act, ANILCA, NPS Management Policies, and the park's backcountry management plan.

* **Park Nonwilderness.** These are essentially the areas of the national park added in 1980 under ANILCA. This land is also administered as the natural zone. However, subsistence hunting, trapping, fishing, and gathering, and activities such as snowmobiling and aircraft landings, are permitted. Per NPS Management Policies, all lands that are suitable for wilderness will be managed as wilderness until Congress acts on the recommendation, and most of this area falls into this category.

Denali National Preserve. This land, also added through ANILCA in 1980, is included under the natural zone and is managed the same as the national park additions (see Park Nonwilderness above) except that sport hunting, trapping, and commercial guiding are allowed.

* list trapping, ^{first} to avoid implications that it is either subsistence or sport.

Historic Zone

Lands in this zone are managed primarily to preserve cultural resources. This includes all sites that are listed on, or are determined eligible for listing on, the National Register of Historic Places. Appropriate uses in this zone include visitor appreciation and study of cultural features and adaptive re-use of historic structures for other park purposes. Lands included in the historic zone are not displayed on the zoning map because of their

relatively small scale. A list of properties is maintained on file at park headquarters. Additional lands may be added to this category as new significant prehistoric sites are discovered and as new structures or districts are added to the National Register.

Park Development Zone

Lands in this zone are managed to accommodate major park development and intensive visitor use. This includes the 300-foot wide park road corridor and all lands where major facilities exist, such as the visitor access center, hotel area, and park headquarters area. Significant additions to this zone, such as for south side development, would have to be made through an amendment to the GMP (or a major follow-up plan, such as a DCP, that serves as an amendment to the GMP).

Special Use Zone

Lands in this zone are owned or used by parties other than the Park Service, its concessioners, or park visitors. This includes all private properties and mining claims.

ADJACENT LANDOWNERSHIP AND USE

Denali National Park and Preserve is surrounded by mostly undeveloped public land. The majority of these lands are owned by the State of Alaska and were granted under the Alaska Statehood Act. A large portion of the south boundary of Denali National Park and Preserve abuts Denali State Park. The state park includes campgrounds, picnic areas, public use cabins, a boat launch at Byers Lake, developed trails, and scenic and interpretive waysides along the George Parks Highway.

There are still major areas of federal land east and northwest of the park that are under Bureau of Land Management administration. Significant parcels of land east and west of Denali are also owned by Native corporations. These include lands owned by Cook Inlet Region, Inc., Ahtna, Inc., and Doyon, Ltd.

There are other relatively small but significant parcels of private land adjacent to the park. These include lands along the George Parks Highway just east of the park that are being extensively developed for commercial facilities to support park visitors. This includes lodging, restaurants, stores, and related employee residential development. Many park and concessioner employees also live outside the park on nearby private lands. The small community of Healy offers the nearest year-round visitor services to the park entrance. Other communities near the east and south sides of the park include Cantwell, Trapper Creek, and Talkeetna, the latter of which serves as the primary staging area for mountaineering and flightseeing trips into Denali.

*mention
Denali
boro
selections*

FUTURE DIRECTION: MANAGEMENT ISSUES, OBJECTIVES, AND STRATEGIES

This section identifies principal objectives for overall park management, specific management issues, objectives for addressing the issues, and detailed strategies to achieve those objectives in the next two to four years. These objectives and strategies are based on current plans and major decisions made in those plans as documented in appendixes C and D. Principal objectives flow from the park purpose and significance statements and are consistent with the broad goals outlined in the 1986 GMP and the management zoning scheme described above, which is also derived from the GMP.³

PRINCIPAL OBJECTIVES

- Encourage new visitor use development for the south side of the park to provide for additional recreation including mountaineering, wildlife viewing, and mountain viewing opportunities.
- Encourage additional access and those types of use and development in the park that are consistent with the park purpose and considering adjacent land use and management opportunities.
- Provide a comfortable, enjoyable transportation system for park visitors.
- Work in partnership with other agencies, organizations, and private industry to develop cooperative solutions to area problems.
- Conduct long-term ecological monitoring to assess park resource conditions and detect impacts resulting from activities in the area.
- Continue subsistence uses of wildlife, fish, and plants and sport hunting in the preserve without impairing natural and healthy populations through implementation of a fully developed subsistence management program. *and park additions ^*
- Protect significant cultural resources with methods that are compatible with the wilderness characteristics of the area.
- Provide high-quality interpretation, education, and information services to facilitate and complement outstanding visitor experiences.

³ In 1994 the Secretary of the Interior appointed a task force to provide recommendations on several major issues for Denali National Park and Preserve. The 1994 Denali Task Force Report recommendations have been incorporated into this statement for management or will be addressed in planning projects outlined in the strategies sections. Many of the principal objectives listed in this section are consistent with the overall goals and conclusions contained in the task force report. Much of that report is reflected in this document.

Strategy. Prepare a plan for the frontcountry/road corridor area in close coordination with related research and transportation management efforts. Emphasize visitor education and a quality experience. Establish effective partnerships and undertake extensive public involvement. Review research conducted to date addressing wildlife behavior and the visitor experience in the frontcountry, and recommend additional studies to enhance the planning effort. Use current approaches to visitor experience and resource protection planning to address visitor impact and capacity issues throughout the frontcountry area. Identify administrative support facility and utility system needs for the area. Begin scoping in the summer of 1995. Review past planning efforts and prepare necessary site plans for key development nodes, including the Wonder Lake, Eielson Visitor Center, and Toklat areas. Include road management objectives to direct maintenance and safety improvements that retain the current character of the road. Undertake extensive public outreach and involvement activities and appropriate National Environmental Policy Act (NEPA) compliance for the plan. Cooperate with state and local agencies and the general public to ensure a full spectrum of accommodations and services over a wider regional context. Emphasize development of most private facilities on non-federal lands wherever possible. Work with major landowners and local agencies to encourage regional land use planning and support the development of borough zoning programs to manage and direct development that is outside the park but related to park visitors and associated land uses. Provide a consistent transportation system management program with several components such as: (1) detailed transportation management objectives; (2) road administration policies, procedures, and regulations (as needed) for access permits, the lottery system for open road use in the fall, and road opening and closing dates; (3) road maintenance standards and design guidelines; (4) concessioner operating plans; (5) road use monitoring procedures; (6) resource impact mitigation measures; and (7) resource monitoring protocols; (8) development for visitor use along the road; (9) dust mitigation and gravel acquisition; and (10) tour lengths and turn around points and visitor destinations. The plan will include appropriate NEPA compliance for these actions.

The Park Service will inventory, research, and monitor activities and projects to build a foundation for transportation management decisions. This will include a need to evaluate visitor characteristics and experience.

Authority. NPS *Management Policies* (1988), chapters 2, 4, 5, 6, 7, 8, 9, 10; ; *General Management Plan* (1986); *Denali Park Road Corridor Development Concept Plan* (1983) as amended.

Discussion. The frontcountry of Denali National Park and Preserve consists primarily of a 300-foot-wide corridor with wider development nodes along a single road reaching approximately 90 miles into the heart of the park. The eastern 15-mile segment of the road is paved and linked to Alaska State Highway 3 (George Parks Highway). The remainder of the road is gravel, much of it is relatively narrow and winding, and it traverses several passes. A series of development nodes along the road include facilities such as airstrips, visitor accommodations, employee housing, maintenance facilities, trails, campgrounds, administrative buildings, and utilities. The road corridor and these development nodes form the current park development zone shown on the management zoning map.

Should acknowledge that gravel road standard is higher to Teklanika. The character is different; it's more primitive after Teklanika.

a fee program has been instituted, larger buses are being used, and some additional trips are being added. With these changes, the VTS user capacity will increase by roughly 15% in 1995, although the number of trips will still be within the limits set in the 1986 GMP, and actual use will depend on the mix of these and other factors.

Managers are faced with questions about the type and extent of facilities, gravel sources, and road design and maintenance standards (including dust abatement). Planning efforts during the early to mid-1980s provided some direction on these issues but recommendations found in those documents will be assessed in light of current circumstances.

Dust and annual gravel loss from park road traffic are also issues, which could be reduced by applying binders or palliatives to the road surface. The Park Service will assess the impacts of traffic-caused dust and the effects of binders and palliatives. Some of these products could also be used to improve the structural stability of the road and may ultimately reduce the amount of gravel extraction needed for annual road maintenance.

The 1994 "Denali Task Force Report" recommends retaining the current character of the park road and makes several detailed recommendations related to use and development in this area. The report recommends that the road limits and the bus transportation system be retained, options to extend the Denali Natural History [short] Tour be explored, and improvements to visitor facilities made. The report also recommends updated wildlife studies and other research and management actions consistent with the strategy outlined above. These and several other recommendations in that report will be addressed in greater detail in the frontcountry/road corridor planning process.

To be fair, you should at least mention the Kantishna Holdings hotel-rail proposal, as in the draft

Issue — Proposed Northern Access Routes

Objective. Encourage the formation of a stakeholder working group to do a preliminary evaluation of current proposals for a new northern access route and determine if further study is warranted. Ensure that the resource impacts from any plan to create a new access route are evaluated with accurate information and in a process that considers park values, a full range of alternatives, the viewpoints of all interested parties, and potential needs for compliance with the National Environmental Policy Act, NPS *Management Policies*, and agency planning guidelines.

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Strategy. Participate in a working group to evaluate the level of interest and controversy over the proposed project. Continue resource monitoring in the potential northern corridors. Communicate regularly with individuals and groups who have a special interest in additional northern access to exchange accurate and complete information. Evaluate proposals for new northern access and other alternatives considering not only effects on park resources but also the time required for development, expense, and support by interested individuals and groups. An environmental impact statement would be required to fully evaluate and implement this strategy after the stakeholder working group has completed its preliminary evaluation.

Authority. ANILCA Sec. 202 (3)(a); *General Management Plan* (1986); *Cumulative Impacts of Mining EIS* (1990).

Discussion. Individuals, interest groups, and landowners hold a wide variety of opinions on whether there is a need for an additional access route into the north side of the park. Gathering information and working toward common understandings is essential to determine whether an additional northern access route is necessary and feasible, and if so, what method of access would best serve visitor needs and protect park resources. Information required includes not only potential effects on park resources, but also visitor experience effects, economic and engineering feasibility, economic benefits, comparison with developments that may already be planned, and levels of support by individuals, interest groups, and landowners.

Alternative northern access routes have been discussed since the 1920 route reconnaissance of Alaska Road Commission Engineer Hawley Sterling, which led to the decision to construct the existing park road to provide access for miners and park visitors. Since 1980, planning for access in the northern part of the park has considered the rights of inholders derived from title XI of ANILCA, in addition to visitor needs. Inholders and lodge owners have generally supported park road vehicle limits and bus precedence instituted by the 1986 GMP. Future large-scale mining in Kantishna is unlikely because of the 1990 EIS decision to purchase all patented and valid unpatented mining claims within the park boundary.

A Northern Route Location Study, begun by the Alaska Department of Transportation in 1993 with Federal Highway Administration funding, was to identify a route between McGrath and the Parks Highway, either passing through or with a spur going to Kantishna. The state discontinued this study in January 1995.

An evaluation of a northern access road and railway was included in the 1994 "Alternatives Transportation Modes Feasibility Study" prepared by a consultant working under contract with the Park Service. The cost of a 78-mile road to Kantishna is estimated at \$170 million and an 86-mile conventional railroad at \$213 million. This estimate is based on excavating an average 2 feet of poor soil and replacing it with higher quality gravel, an all-weather gravel surface for the road, and a maximum grade of 6% for the road and 1% for the railroad.

Many landowners, businesses, miners, community leaders, and tourism promotion groups strongly believe that a new northern access route is necessary and feasible.

The 1994 "Denali Task Force Report" also addressed this question. The Task Force did not reach a consensus on this issue, but ~~a related~~ ^{the} NPS Advisory Board resolution supports a new rail line to Kantishna contingent on stakeholder agreements on the extent and nature of development in the Wonder Lake area.

that adopted the report

Issue — Public Relations and Information Dispersal

Objective. Effectively gather, analyze, and disperse accurate and complete information on which to base management decisions, and establish a proactive public relations program to better communicate with agencies, organizations, and individuals interested in the park. Establish effective educational and community outreach programs in local schools and communities.

for spatial data acquisition needs to be prepared and this should be included in the park's GIS Plan.

→ Important issue: Discuss steps taken to reinstate subsistence eligibility of local residents disenfranchised by the 1989 McDowell decision
Issue — Subsistence Management and Wildlife Consumptive Use

Objective. Work with the Denali Subsistence Resource Commission to develop a subsistence management plan and provide for consumptive uses of resources where legally authorized while protecting the integrity of Denali's fish and wildlife resources. Cooperate with the Alaska Department of Fish and Game, other agencies, advisory groups, and local users to manage hunting and fishing in the park and preserve. *good*

Strategy. Work closely with Denali's Subsistence Resource Commission, village councils, local advisory committees, federal regional advisory councils, the Federal Subsistence Board, the Alaska Department of Fish and Game, and the state fish and game boards to manage consumptive use of fish, wildlife, and vegetative resources. Develop a subsistence management plan and implement inventory and monitoring programs for consumptive resources. *Mention the south side subsistence study referenced at the bottom (last sentence) of page 16.*

Authority. ANILCA Title VIII; Subsistence Regulations in 50 CFR, part 100; NPS Agency Regulations in 36 CFR, part 13; NPS *Management Polices* (1988); *General Management Plan* (1986).

Discussion. Subsistence uses by qualified local rural residents are allowed within the ANILCA additions to the park and in the preserve, while sport hunting is allowed only in the preserve. The law also states that in times of shortage when taking must be restricted to assure continued viability of fish and wildlife populations, subsistence use shall be given a preference over all other consumptive uses.

* *in their formulation of*
Denali National Park staff will work closely with the Denali Subsistence Resource Commission ~~to formulate~~ a general subsistence management plan and a specific subsistence hunting program that may address major topics such as eligibility, access, harvest monitoring, methods and means of taking, research needs, use of cabins and shelters, trapline management, and timber management.

As a component of the resource management plan, park staff will develop, in cooperation with the Alaska Department of Fish and Game and subsistence users, inventory and monitoring programs for harvested species and work to improve harvest report information from both sport and subsistence users.

Cooperative efforts and agreements between the park staff and the Alaska Department of Fish and Game will be encouraged for planning, coordinating, and conducting wildlife surveys, especially on preserve lands, for those species ranging beyond park boundaries.

* The SRC has the lead responsibility under ANILCA. NPS supports that role. This implies that NPS develops the plan.

preparation of that document, especially in the Kantishna area, requiring an update to the plan.

With the passage of ANILCA all lands added to the park were withdrawn from filing new mining claims. However, valid claims may continue to be operated under existing laws. There are no valid claims in either the Denali Wilderness or in Denali National Preserve. There are 14 patented claims and 168 unpatented claims in the 1980 additions to Denali National Park, totalling approximately 4,610 acres, the bulk of which are in the Kantishna area (as of 4/95).

On July 22, 1985, the U.S. District Court for Alaska enjoined the National Park Service from approving plans of operations for mining in national park system units in Alaska. The court called for preparation of an EIS evaluating the cumulative effects of mining in Denali National Park and Preserve. A record of decision was signed by the regional director on August 21, 1990, calling for acquisition of all mining claims.

Landowners and miners have been affected by park expansion in 1980 and the denial of mining plans. Legal and administrative constraints, such as the 1976 Mining in the Parks Act (16 USC 1901), 36 CFR 9 mining regulations, 43 CFR 36 access regulations, the 1986 *General Management Plan/Land Protection Plan*, and decisions made through the 1990 *Environmental Impact Statement on the Cumulative Impacts of Mining* allow for only minimal mining activity. The desire to keep development at a minimum needs to be communicated and partnerships need to be developed with landowners. Administrative or other measures should be taken to expedite the land acquisition process. Several land exchanges have also been proposed over the last several years and these need to be resolved in a timely manner.

The 1994 "Denali Task Force Report" recommends that the NPS expedite the purchase of mining claims and patented lands in the Kantishna area, including implementation of new acquisition methods.

Continued Acquisition will be dependent upon Congressional funding.

VISITOR USE

Issue — Interpretation and Information Services

Objective. Identify visitor needs and develop new interpretive facilities, media, and programs to meet them. Improve the quality and effectiveness of existing programs. Improve the partnership with park concessioners and the Alaska Railroad to deliver interpretive services to bus and railroad passengers. Plan for and provide accessible facilities, programs, and media for special populations. Update or develop relevant planning documents as outlined below.

Strategy. Conduct a new visitor use study to determine visitor needs, expectations, and satisfaction levels, and update information on visitor demographics and use patterns. Address interpretive needs, including the needs of the Alaska Natural History Association, in the south side and frontcountry plans. Amend the 1990 "Interpretive Prospectus" and the 1993 "Wayside Exhibit Proposal" to reflect changes outlined in those plans. Develop an informational sign plan. Increase interpretive training for concession and Alaska

not easily modified to suit modern requirements. Significant expansion of both office space and temporary employee housing is necessary. Near the headquarters area, temporary employee housing should be relocated and expanded. Elsewhere in the park it should be upgraded.

The adequacy and reliability of many park utility systems are known or suspected to be below acceptable standards or regulatory requirements. Electrical capacity in the park entrance area, which is barely adequate to meet normal demand and antiquated water and sewer systems, should be largely corrected by the upgrade construction scheduled for 1996. However, the adequacy of the Horseshoe and Riley Creek wells and the sewer lagoon will remain suspect.

Electrical capacity and distribution balance in the headquarters area needs further analysis and enhancement for emergency backup capacity. Sewer systems in the headquarters area have a projected life span of five to eight years, and area soils limit the practical options for replacement. While sewer systems west of park headquarters seem adequate, there is a need for a system in the west unit to handle chemical toilet effluents and thus reduce trucking impacts and the dose-loading of the entrance area lagoon.

Electrical capacity at Toklat and Wonder Lake is also marginal. Initiating an annual preventive maintenance program for all water, sewer, electrical, heating, and fuel systems could help prevent further degradation.

Increased use of telephone, electronic mail, data transmission, and automated information management is essential for efficient use of staff time. A modern, upgraded telecommunications system is needed to properly manage the park.

Annual maintenance levels that prevent degradation of roads, trails and adjacent resources must be established. This also requires identifying adequate long-term material sources and methods to assure proper and adequate equipment availability.

Annual maintenance for public facilities (such as campgrounds, visitor centers, and restrooms) has been barely adequate to provide for public health and cannot address facility degradation, changing use levels, or visitor accessibility needs. The lack of adequate maintenance and timely replacement of vehicles and equipment continuously challenges the park staff's ability to perform work.

Issue — Access to Inholdings

*Need to comply with
ANILCA 1301(b)(4)*

Objective. Develop guidelines to define "adequate and feasible" in a case-by-case review of access for private landowners in the park. Resolve park road travel issues resulting from language in title XI of ANILCA concerning access to inholdings. Promulgate special regulations if needed for road closure, safety, oversize vehicle travel, recreational vehicle access, and commercial use. Complete annual review of access issues and summarize in a report.

Strategy. Communicate with individuals and groups seeking access to determine the variety of issues involved and the best method of resolution. Work with the departmental

Need a general statement preceding these specifics
Public Review Draft which notes that Alaska park units
are different... May 31, 1995

APPENDIX A: SUMMARY OF ANILCA PROVISIONS

The Alaska National Interest Lands Conservation Act (ANILCA) (Public Law 96-487, December 2, 1980) provides for the "designation and conservation of certain public lands in the State of Alaska. . . ."

Section 101. (a): Establishment of all areas that "contain nationally significant natural, scenic, historic, archeological, geological, scientific, wilderness, cultural, recreational, and wildlife values, the units described in the following titles are hereby established.

(b): Values to be protected: unrivaled scenic and geological values associated with natural landscapes; to provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas; to preserve in their natural state extensive unaltered arctic tundra, boreal forest, and coastal rain forest ecosystems; to preserve historic and archeological sites, rivers, and lands, and to preserve wilderness resource values and related recreational opportunities including but not limited to hiking, canoeing, fishing and sport hunting, within large arctic and subarctic wildlands and on freeflowing rivers; and to maintain opportunities for scientific research and undisturbed ecosystems.

(c): ". . . to provide the opportunity for rural residents engaged in a subsistence way of life to continue to do so."

Section 203: Administration of new National Park Service areas, pursuant to cited laws; national preserve permit hunting; no entrance fees.

Section 206: Withdrawal from future disposition for mining or state and Native selections.

Title VIII - Subsistence Management and Use

The circumstances that allow federal

Title VIII is a lengthy and extremely important part of ANILCA, establishing ~~federal policy for the~~ management of subsistence on all federal lands in Alaska. Denali has implemented Title VIII, and the NPS sits on the Federal Subsistence Board. Rather than cite all of Title VIII, this SFM only addresses those segments that are specific to NPS.

Section 801: Findings and declaration of opportunity for subsistence.

Section 802: Subsistence policy.

Section 803: Subsistence definitions.

Section 804: Preference for subsistence uses.

Section 808: Establishes park subsistence resource commissions.

Section 809: Cooperative agreements for subsistence.

Section 810: Procedural requirements to assess impacts of land use decisions on subsistence.

Section 811: Reasonable access for subsistence.

Section 812: Research on subsistence.

Section 813: Periodic reports on subsistence.

Section 815(a): Subsistence take levels consistent with natural and healthy populations of fish and wildlife.

Section 816: Closure to subsistence uses.

Section 1010: Assessment of oil, gas and mineral potential on all public lands in the state.

Section 1110: Allows for motorized access for traditional activities ^{and access to inholdings} and travel. Public notice required before enacting a closure. _A

Section 1301: Management plan completion date.

Section 1303: Use of cabins; improved property on national parkland.

Section 1306: Administrative sites and visitor facilities.

Section 1307: Revenue-producing visitor services.

Section 1308: Local hire.

Section 1313. Administration of national preserves.

Section 1314: Taking of fish and wildlife.

Section 1315 (a): Wilderness management in Alaska.
(c): Existing cabins.
(d): New cabins.

Section 1316: Allowed uses of temporary facilities to manage fish and wildlife.

Section 1317: General wilderness review provision.

Section 1319: Effect on existing rights.

The legislative history associated with development of the Alaska National Interest Lands Conservation Act (ANILCA), (PL 96-487, December 2, 1980) states that: "four units in large part - . . . Mount McKinley . . . - are intended to be large sanctuaries where fish and wildlife may roam freely, developing their social structures and evolving

over long periods of time as nearly as possible without the changes that extensive human activities would cause" (Senate Report 1979).

The 1979 Senate Report also includes the following:

We continue to question the validity of these citations

large sanctuaries ... as nearly as possible without the changes that extensive human activities would cause

assure the optimum functioning of entire ecological systems in undisturbed natural habitats . . . this standard must be set very high

the prime resource for which the north addition is established is the critical range necessary to support populations of moose, wolf, and caribou as part of an integral ecosystem. Public enjoyment of these outstanding wildlife values would thus continue to be assured

the south addition includes that part of the Mount McKinley massif not presently within the park and its associated spectacular glacial gorges and valleys . . . Lowland areas in the southern addition provide ecologic diversity and opportunity for recreation and access (1979 Senate Report on ANILCA)

National Preserves are to be managed exactly as are the National Parks . . . Congress intends that the Secretary shall manage National Park System units in Alaska to assure the optimum functioning of entire ecological systems in undisturbed natural habitats . . . the preeminent natural values of the Park System shall be protected in perpetuity, and shall not be jeopardized by human use. These are very special lands, and this standard must be set very high: the objective for Park System lands must always be to maintain the health of the ecosystem, and the yield of fish and wildlife for hunting and trapping must be consistent with this requirement (Congressional Record-House, H10549, November 12, 1980)