

May 7, 2003

Paul Anderson
Superintendent
Denali National Park and Preserve
Backcountry Management Plan
PO Box 9
Denali Park, AK 99755

**Re: Access Fund Comments to the Denali National Park and Preserve
Backcountry Management Plan**

Dear Superintendent Anderson:

On behalf of the Access Fund I write to formally comment on the Denali National Park and Preserve Backcountry Management Plan (the "BMP") for Denali National Park and Preserve ("Denali NPP"). The Access Fund welcomes the opportunity to comment on the Denali BMP and looks forward to working with the National Park Service (NPS) to preserve climbing opportunities within Denali NPP.

The Access Fund

The Access Fund is a 501 (c) 3 non-profit advocacy group representing the interests of approximately one million rock climbers and mountaineers in the United States. We are America's largest national climbing organization with over 15,000 members and affiliates. The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission. Working in cooperation with climbers, other recreational users, public land managers and private land owners, the Access Fund promotes the responsible use and sound management of climbing resources. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers. For more information about the Access Fund, log on to www.accessfund.org.

GENERAL REMARKS

For 100 years mountaineering has been a consistent use of the Denali area and this longstanding recreational activity must be viewed as a traditional and appropriate use of Denali NPP. Indeed, federal law directs Denali NPP to establish regulations that are "primarily aimed at the freest use of the said park for recreation purposes by the public and for the preservation of animals, birds, and fish and for the preservation of the natural curiosities and scenic beauties thereof." 16 USC § 351. Moreover, Section 202(3)(a) of ANILCA established specific management direction for "continued opportunities, including reasonable access, for mountain climbing, mountaineering and other wilderness recreational activities." In sum, because of its long history and specific references by

Congress, mountaineering and mountain climbing must be viewed as “traditional” uses of Denali NPP.

Growth in climbing within Denali NPP has occurred primarily on Denali’s West Buttress route. Accordingly, management actions necessary to address issues on this route may not be appropriate for other routes throughout Denali NPP. Today mountaineers in Denali NPP focus almost exclusively on Denali (receiving by far the most climbers), Mount Foraker, and Mount Hunter. Use elsewhere in the Park and Preserve is relatively low and sporadic. Approximately 80 percent of the mountaineering use on Denali itself occurs on the West Buttress route, and only Denali’s West Rib, Muldrow Glacier route, and the Cassin Ridge see regular traffic. As such, most management initiatives concerning mountaineering in Denali NPP should focus on the West Buttress and perhaps these other regularly traveled routes.

The BMP provides several alternatives for managing both current and future uses in Denali NPP. Because this BMP will have long-lasting impact on Access Fund members and climbers both nationally and internationally, we are very interested in the specific management regime you ultimately select. The Access Fund does not endorse any of the specific alternatives as we feel that there are aspects of each particular alternative that may be most appropriate regarding each specific issue. Because preferred alternatives are commonly selected, this document notes how Alternative D may impact the management of Denali NPP.

Under Alternative D the NPS would provide for expanded recreational opportunities in many areas of the Park and Preserve for activities that are particularly well suited to the unique character of Denali. The preferred alternative would consider Denali NPP in a regional context and provide for wilderness experiences that may not always be available on adjacent lands. Alternative D allows for patterns and types of use to be somewhat similar to current conditions, but increases in levels of use would be noticeable at several locations. The Access Fund and many local Alaskan climbers feel that while some aspects of this management approach would benefit the Park and Preserve—and its users—Alternative D in many respects may not represent the best management direction for Denali NPP.

Of particular concern is the requirement under Alternative D that when use levels grow to match the management vision for a particular unit, such use levels would be capped. The Access Fund believes that the “human encounter” methodology used for establishing capacity limits to be inappropriate for Denali and most alpine zones. In addition, registration requirements could be streamlined, and eliminating selected administrative services could reduce fees. Commercial over-flights and snowmachine use should be limited, and human waste management should be the primary management focus of the NPS within the Mountaineering Special Use Area, which should be expanded to other popular mountaineering zones.

SPECIFIC ISSUES OF CONCERN

Human Encounters. Alternative D would increase the number of available permits for climbers attempting to climb Denali to 1,500 during the main April 1- August 1 mountaineering season. There would be no daily limits established, but the limit of 1,500 would be reevaluated 10 years after approval of the BMP.

Although Alternative D would increase its permit limit, permits would nonetheless be capped at 1,500. The Access Fund believes that using the human encounter methodology in alpine zones to be a misleading and inappropriate method for managing mountaineering capacity in Denali NPP. Climbing above tree-line is a much different from other forms of backcountry travel because climbers in the alpine zone can be viewed from afar, yet still not be the same kind of human encounter one would experience in a wooded backcountry area. The NPS should consider designating other routes on Denali and other areas in the Park and Preserve as Mountaineering Special Use Areas to prevent current use levels from violating proposed human encounter standards.

The Access Fund opposes the use of the “human encounter” methodology as the singular measurement by which the NPS would manage wilderness and non-wilderness areas in alpine zones such as exist within Denali NPP. In these areas, using human encounters to measure wilderness values is too narrow, incomplete, and potentially biased. While solitude is a condition valued by most Denali visitors, capacity limits may not be the best way to achieve this result, especially since nearly all climbers are on one route—the West Buttress.

The Access Fund feels that the opportunity to climb in solitude is something that should be protected and managed for in places like Denali NPP. However, it makes little sense to apply this human encounter standard throughout Denali NPP when almost all visitation is focused on one area and an “encounter” can be interpreted various ways. NPS policy states that “[r]estrictions placed on recreational uses that have been found to be appropriate will be limited to the minimum necessary to protect park resources and values, and promote visitor safety and enjoyment.” NPS Policy Manual, Section 8.2.2. Rigid capacity restrictions formulated through a methodology inappropriate to alpine environments runs counter to this policy.

Our primary concern is that an inflexible focus on the number of human encounters allowed in a given area may unnecessarily limit the number of climbers who have the opportunity to climb a given route or peak, but will do nothing to protect the mountain resource. In alpine areas climbing and mountaineering takes place in an environment very different from locations where hiking occurs, which is the recreational activity studied the most under the human encounter methodology. In Denali NPP, mountaineering occurs above timberline in open terrain where it is virtually impossible to avoid seeing other climbing parties on the same route. This contrasts greatly with human encounters below tree line where visitors generally do not see each other except when passing on a trail or at a campsite although they may be only a very short distance away. Furthermore, safety dictates that mountaineering in glaciated terrain such as are found within Denali

NPP requires more than one climber per rope to enable crevasse rescue. Mountaineers also cross over the same terrain several times ferrying loads and acclimatizing, unlike backpackers. Climbers within these high alpine environments may well be in view of each other, but such hardly impacts the solitude of those visitors. Planes buzzing overhead does far more to disrupt the solitude of these alpinists than does another mountaineering party two-thousand feet above within view on the same route. Accordingly, human encounter standards should not be the sole determination in alpine zones when identifying capacity limits. Capacity limits for climbers on Denali and elsewhere will not serve to mitigate the primary problem associated with mountaineering: human waste. Human waste will continue to be deposited on glaciers causing health concerns no matter the capacity if the NPS does not focus on this issue.

Because mountaineering in alpine areas occurs in a very open environment, capacity limits based on human encounters will eventually deny access to climbers that want to visit particular areas unless they are within the Mountaineering Special Use Areas. If the NPS insists on using the human encounter methodology in the alpine areas of Denali NPP to determine capacity limits, then the NPS should also consider whether other routes on Denali and other areas within the Park and Preserve should be designated as Mountaineering Special Use Areas as well. Areas that may deserve such designation include Denali's West Rib, Muldrow Glacier, and Cassin Ridge; Mounts Foraker, Hunter, Huntington, and the Ruth Gorge.

In sum, the Access Fund feels the human encounter standards for determining capacity limits in alpine zones is not an appropriate tool. To control user impacts the NPS should instead focus on human waste management. Further, the NPS should consider expanding the Mountaineering Special Use Areas.

Human Waste. Human waste and trash are the most serious impacts caused by climbers within Denali NPP. The Access Fund is encouraged that the BMP alternatives call for increased management of human waste and trash because we believe these are the most significant issues facing mountaineering in Denali NPP.

The Access Fund fully supports and hopes to encourage efforts to reduce the impact of human waste and trash on the environment, especially on the West Buttress of Denali. As you know, last year the Access Fund received the "Alaska Excellence Award" in December for its contribution of \$5480 towards the Clean Mountain Can Project on Denali. The award recognizes the people and programs that are the best examples of leadership, stewardship, and innovation in the fields of natural and cultural resources, conservation and education. The Clean Mountain Can is an innovative project designed to reduce impacts and waste disposal problems at high altitude. The project now requires climbers to use the 400 human waste containers positioned above 14,000-feet on popular routes. The Access Fund encourages the NPS to require the use of Clean Mountain Cans on the entire West Buttress route of Denali. We also encourage the NPS to use incentives to persuade park visitors to be responsible with their trash and human waste.

Registration and Fees. While the Access Fund supports day-of-departure registration to better identify where climbers are going, we oppose the extension of Denali's 60-day advance registration requirement to all climbers, especially those with demonstrated experience on Denali and other areas of Denali NPP. Experienced climbers should be free from this advance registration requirement and thus we support the continued use of the shorter 7-day advance registration requirement for this group. Moreover, climbing management fees should not be applied to climbers accessing peaks other than Denali and Foraker. Climbers should not be singled out to pay management fees when other backcountry users are not required to support their activities.

An inflexible 60-day advance registration requirement is inappropriate when applied to all climbers regardless of their experience level. Moreover, climbers often need to act quickly to access routes that come into condition infrequently or unpredictably. The Access Fund would support registration system that is not burdensome to climbers. For example, self-service permits could provide easy process by climbers while providing the NPS with use patterns and other information. While first-time climbers should be educated as to the unique conditions and issues at Denali NPP, there should be continued accommodation for those climbers that can show a high level of experience in the Park and Preserve.

The \$150 per person climbing fee for Denali and Foraker is not proportional to like recreation fees charged elsewhere on federal lands. This fee may be reduced through management changes such as ending the use of the Lama helicopter for rescues and by eliminating the 14,000-foot administrative camp on the West Buttress route. Before the NPS looks to expand mountaineering fees, the Park and Preserve should look at other, non-mountaineering related programs to determine how much it costs to provide these services and what percentage of these costs are passed on to the visitors who use them. Hikers, backpackers, snowmobilers and other dispersed backcountry users currently are not charged fees for accessing the backcountry, though presumably they incur significant amounts of management time and expense.

The NPS website for Denali states that part of this \$150 mountaineering fee goes towards supporting search and rescue efforts, however it may be that this fee only pays for educational efforts regarding climbers attempting Denali and Foraker. By all accounts this educational program is excellent but the NPS should nonetheless provide an accounting as to why the fee is at its current level, and if appropriate consider reducing the fee. Furthermore, it is not clear whether other educational programs—such as bear education for campers in the north part of Denali NPP—also requires a similar fee. If not, climbers are being unfairly singled out.

Finally, there are not enough climbers visiting other areas of Denali NPP beyond Denali and Foraker to warrant additional mountaineering fees in those locations. Further, we believe that targeting climbers to pay management fees when other, more numerous backcountry users are not being asked to do so is blatantly discriminatory.

This unfair management practice is counter to NPS policies, which state that “[f]ee rates will be reasonable and equitable, and consistent with criteria and procedures contained in law and NPS guidance documents.” NPS Policy Manual Section 8.2.6.1.

Fixed Anchors. The Access Fund believes fixed anchors are necessary, appropriate, and historic minimum tools for use in protecting climber safety. Except the No Action option, all of the alternatives in the BMP include some limitation on the use, placement and replacement of fixed anchors. Although the Access Fund believes fixed anchors are historic necessary tools that provide a modicum of safety and should be allowed in all areas of Denali NPP, fixed anchors nonetheless need to be managed to prevent inappropriate cumulative impacts. The Access Fund supports reasonable regulations on the placement of fixed anchors and have long worked with the federal land management agencies to devise a reasonable solution to the use and placement of fixed anchors in federally designated wilderness. As you may know, the NPS could have a national policy on the use and placement of fixed anchors in designated wilderness as early as this year.

Any fixed anchor restrictions should be minimal and the least amount necessary to maintain wilderness and backcountry values at Denali NPP. The current ban on power drills is probably enough given the difficulty of hand drilling. The abundance of outstanding technical climbing opportunities within Denali NPP requires at least the *de minimus* amount of fixed anchor use and placement. To strictly limit their use would severely limit climbing opportunities in the Park and Preserve in violation of ANILCA’s mandate to provide “continued opportunities, including reasonable access, for mountain climbing, mountaineering and other wilderness recreational activities.”

Search and Rescue Services. Denali NPP provides unusually extensive search and rescue services to climbers. The NPS pays for a specialized, high-altitude Lama helicopter during the climbing season for rescues, maintains administrative camps at 14,000 and 7,000 to manage climbers and aircraft, and provides mountain patrols to facilitate rescues and climbing management. Indeed, these extensive services may be beyond the minimum necessary as mandated by NPS policies.

“The number and type of facilities to support visitor use, including sanitary facilities, will be limited to the minimum necessary to achieve a park’s backcountry management objectives and to provide for the health and safety of park visitors.” NPS Policy Manual, Section 8.2.2.4. Moreover, “[a]ll management decisions affecting wilderness must be consistent with the minimum requirement concept... The minimum requirement concept will be applied as a two-step process that determines: (1) Whether the proposed management action is appropriate or necessary for administration of the area as wilderness and does not pose a significant impact to wilderness resources and character; and (2) The techniques and types of equipment needed to ensure that impact to wilderness resources and character is minimized.” NPS Policy Manual, Section 6.3.5

The Access Fund feels the NPS should analyze the various rescue and administrative services on Denali—within the context of the above-noted management policies—so to determine whether it may be possible to eliminate or significantly reduce costs.

Accordingly, the Access Fund encourages the NPS to consider the effects of eliminating or significantly reducing these administrative services. The benefits of these changes would be the consequent reduction in fees charged to climbers, as well as returning Denali to more a primitive state. However, Denali would also become a much more inhospitable place with associated consequences such as putting rescue rangers (and nearby climbers) in harm's way through an increased number of rescues taking place on the ground. Also, more unprepared climbers will undoubtedly die each year.

Nonetheless, the NPS must educate and inform climbers as to the potentially hazardous conditions on Denali. However, the NPS may instill a false sense of security in some climbers by providing these extensive administrative and rescue services, and moreover the NPS is not required to provide these services: "The recreational activities of some visitors may be of an especially high-risk, high-adventure type, which pose a significant personal risk to participants, and which the Service cannot totally control. Park visitors must assume a substantial degree of risk and responsibility for their own safety when visiting areas that are managed and maintained as natural, cultural, or recreational environments." NPS Policy Manual, Section 8.2.5.1

Although the dramatic rescues by highly skilled climbing rangers and helicopter pilots on Denali is commendable and has saved valuable lives, the NPS should nonetheless ask: (1) whether this management regime is appropriate under NPS management policies, and (2) whether the costs are worth it. While the Access Fund does not necessarily support an alternative that eliminates entirely these outstanding administrative and rescue services, we encourage the NPS to consider any alternative that would reduce the intensive and expensive management practices within Denali NPP.

Overflights and Snowmachine Use. At Denali NPP, aircraft is the primary means of mountaineering access. NPS policies acknowledge that "[a]viation can provide an important, and in some cases the preferred, means of access to remote areas in certain parks, especially in Alaska. In such cases, access by aircraft may make an important contribution to the protection and enjoyment of those areas. Dependence on aviation will be fully considered and addressed in the planning process for those parks." NPS Management Policies, Section 8.4.1.

Alternative D seeks localized reductions in impacts from aircraft noise through various mechanisms based on management area designations and associated desired conditions. The Access Fund supports management efforts to reduce the audible impact of sightseeing aircraft. Although the Access Fund supports regulations designed to lessen the impact of sightseeing plane flights, aircraft access in Denali NPP is an historic and appropriate means of mountaineering access that should be allowed to continue. Indeed, Section 202(3)(a) of ANILCA, requires "continued opportunities, including reasonable access, for mountain climbing, mountaineering and other wilderness recreational activities." There is no similar provision providing for sightseeing aircraft that significantly disturbs the solitude in many areas of Denali NPP.

Under Alternative D, the park additions and preserve would be open for snowmobile use at different levels of activity consistent with desired conditions in management areas. In addition to allowing snowmobile use for subsistence, wide corridors would be designated in backcountry areas for day use and overnight touring and access. The NPS would temporarily mark these corridors during the winter, and snowmobile access for recreation would be limited to the marked routes. Registration for use of these areas would be mandatory. Units marked as Dispersed Use on the map would allow snowmobile access for subsistence and for a limited number of day and overnight trips by permit. Units marked as Subsistence Use on the map would allow snowmobile access only for subsistence purposes. The Old Park Special Resource Area would remain closed to all snowmobile access, and the NPS would phase in requirements for emissions standards and cleaner, more efficient, and lower impact snowmobile technology.

Existing national policy prohibits snowmobile use beyond the traditional subsistence use authorized by ANILCA in the Park additions and Preserve areas; accordingly, recreational snowmobile use should be eliminated throughout the Park and Preserve. The Access Fund urges the NPS to enforce this prohibition. The NPS has long neglected its management duties by allowing snowmobile use in violation of Executive Order 11644 that prohibits off-road vehicles where they damage the environment. Executive Order 11644 specifically prohibits off-road vehicle use in designated wilderness and primitive areas. However, such off-road vehicles may be allowed in National Parks, Natural Areas, and National Wildlife Refuges “only if the respective agency head determines that off-road vehicle use in such locations will not adversely affect their natural quiet, aesthetic, or scenic values.” Executive Order 11644, Section 3(4). Because snowmachine use in Denali NPP adversely affects its natural quiet, the NPS should enforce Executive Order 1164 and prohibit such activity throughout the Park and Preserve.

CONCLUSION

The Access Fund feels strongly that the Denali BMP must preserve for future generations the unique natural conditions of Denali NPP, but also the special recreational opportunities found there. The NPS is governed by very specific management polices and legislation that controls the various activities within Denali NPP. A selective approach to the various components of the BMP alternatives may be the best management direction for Denali NPP. These comments have attempted to provide the best “menu” from the various alternatives within the BMP. Where Alternative D is not adequate in our view, we have addressed the specific issues above.

The Access Fund urges the NPS to re-evaluate its sole use of the human encounter methodology for determining capacity limits in the alpine zones; and in the alternative, expand the Mountaineering Special Use Areas. Human waste must be a primary focus of mountaineering management, and the Access Fund applauds your progressive initiatives such as the Clean Mountain Can and encourages the NPS to develop more incentive-based polices that will persuade visitors to remove or limit their human waste and trash. The NPS should look at reducing its administrative services to bring the mountain back to a more primitive condition and reduce special mountaineering fees, some of which are

discriminatory against climbers. The advanced-day registration requirement should continue to accommodate the many experienced Denali veterans. Finally, snowmachine use and sightseeing overflights should be limited to reduce noise impacts, although aircraft access for climbing—as provided by federal law—should be maintained.

We hope that these comments are helpful in finalizing the BMP for Denali NPP. The Access Fund looks forward to future opportunities with the NPS to maintain climbing access and conserve the climbing environment at Denali NPP.

Best Regards,

Jason Keith
Policy Director
The Access Fund

Cc: Steve Matous, Access Fund Executive Director
Wayne Fuller, Access Fund Alaska Regional Coordinator