

DENALI NATIONAL PARK AND PRESERVE COMMERCIAL SERVICES STRATEGY

August 2017





» Denali National Park and Preserve Mission

We protect intact the globally significant Denali ecosystems, including their cultural, aesthetic, and wilderness values, and ensure opportunities for inspiration, education, research, recreation, and subsistence for this and future generations.

» National Park Service Mission

The National Park Service (NPS) preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. The NPS cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.

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Executive Summary

This strategy document seeks to provide clarity and consistency for park management when making decisions regarding commercial services at Denali National Park and Preserve, and for the broader public when interpreting these decisions.

A variety of stakeholders inside and outside the park provided input throughout the development of this strategy. Incorporating feedback from park staff, businesses, visitors, and community organizations ensures that the document represents the perspective of the park's diverse stakeholders. This strategy does not act as a compliance document nor does it assess environmental impact.

In 2017, at the time of this strategy's drafting, there were 51 Commercial Use Authorizations (CUAs) and 18 concessions contracts at the park. Major commercial service activities include ground transportation, sled-dog passenger and freight services, air-taxi service, guided mountaineering, guided hunting, and guided hiking.

The National Park Service Concessions Management Improvement Act of 1998 provides criteria for commercial services in national parks. All commercial services authorized with concession contracts must be deemed "necessary," and all authorized commercial services must be deemed "appropriate." The park leadership team defined necessary and appropriate in a park-specific context:

Necessary Criteria: Concession contracts must meet at least one necessary criterion; CUAs may be issued without meeting any necessary criteria:

- » Provides education and/or inspiration related to the purpose of Denali National Park and Preserve
- » Provides access to areas of the park and preserve where the time or equipment necessary for visitors to reach those locations would otherwise be prohibitively lengthy or expensive; in the backcountry, service assists visitors in exploring by means that require specialized knowledge, such as mountaineering or dog mushing
- » Facilitates the protection of park resources and values
- » Provides a basic service that is not available within a reasonable distance from the park





Appropriate Criteria: All commercial services, including CUAs and concession contracts, must meet all appropriate criteria:

- » Is consistent with the purpose and significance of Denali National Park and Preserve
- » Adheres to federal, state, and local laws and regulations and all National Park Service policies
- » Maintains public health, safety, and well-being; commercial service must:
 - » Carry appropriate insurance
 - » Meet all federal, state, and local health and safety codes and regulations
 - » Provide relevant safety instructions to visitors
 - » Where applicable, be provided by certified individuals and businesses
- » Avoids unacceptable impact to park resources and values and is consistent with management plans, given existing use in the area
- » Provides enjoyment appropriate to the park while not unduly conflicting with park programs or activities, traditional or subsistence activities, or existing NPS commercial services
- » Does not exclude the general public from participating in limited recreational opportunities

This strategy also identifies high-potential new services given trends in recreation in the park. It first outlines growth trends, potential drivers, and existing constraints of off-season visitation. Then, it provides possible new commercial services to consider given recreational trends.

WINTER AND SHOULDER SEASONS

Visitation during the winter and shoulder-season months (October to April) increased by 142 percent from 2012 to 2016. Drivers of this increase are not fully understood—outdoor industry trends for winter recreation activities have been fairly stable. However, tour operators suggest that winter interest in Alaska is driven by visitors' desire to experience the northern lights (aurora borealis), enter the Arctic Circle, visit Chena Hot Springs, and explore Denali National Park and Preserve. The primary constraint to this growth is area lodging (only 105 rooms available currently).

OPPORTUNITIES IN COMMERCIAL SERVICES

- » Bike rental, off-peak season (including fat-tire bikes)
- » Bike tours, off-peak season
- » Day hiking, guided
- » Dogsledding, short trips
- » Environmental education
- » Gear rental, camping
- » Guided winter activities and gear rental
- » Gear rental, human-powered watercraft (canoeing, paddleboarding)
- » Overnight hiking, guided (including pack-rafting)
- » Photography instruction

Introduction

Denali National Park and Preserve (Denali) encompasses over six million acres. It is home to Denali, the tallest mountain in North America, and contains deciduous taiga, wide expanses of tundra, extensive glaciers, abundant wildlife, and rich cultural histories. Denali's Wilderness Character Narrative¹ offers the following description of its landscape:

"The Denali Wilderness is a land of paradox. It is inviting, and it is terrifying; accessible and remote. It is an essentially undeveloped wilderness with a road corridor through the middle that brings millions of people to its edge. It is untrammeled yet managed. . . . It is a natural and intact ecosystem celebrated by scientists, writers, hunters, adventurers, and artists alike."

Many visitors experience Denali's wilderness along 92 miles of the curving park road. Others get a sense of the beauty and solitude of the park through camping, backpacking, hiking, mountaineering, and a multitude of other recreational activities.

Commercial services facilitate many of these activities and can serve as a bridge between the numerous visitors who come to Denali each year and the park itself. As Stephen Mather, the first director of the National Park Service (NPS), said, "Scenery is a hollow enjoyment to the tourist who sets out in the morning after an indigestible breakfast and a fitful night's sleep on an impossible bed."

At the same time, commercial operations—like all activities in the park—have implications for wildlife, vegetation, and other park resources. And, to ensure a meaningful experience for all visitors, there ought to be a balance between commercial services for those willing to pay and park-provided services accessible to all. Informed decisions regarding commercial activities are critical in achieving the fundamental mission of the NPS: to preserve the land for visitor enjoyment and future generations. This Commercial Services Strategy (CSS) is written, therefore, to provide guidance for future decision-making regarding commercial services in Denali National Park and Preserve.

DENALI NATIONAL PARK AND PRESERVE, "DENALI WILDERNESS CHARACTER NARRATIVE," NATIONAL PARK SERVICE, ACCESSED JUNE 14, 2018, HTTPS://WWW.NPS.GOV/DENA/LEARN/NATURE/UPLOAD/DENALI-WILDERNESS-CHARACTER-NARRATIVE-ACCESSIBLE.PDF.





1.1 STRATEGY PURPOSE

Commercial services play a vital role in park operation by offering visitor services directly to the public.

A CSS allows a park to:

- » Describe park conditions for visitor use and commercial services
- » Outline relevant management policies
- » Create a framework of necessary and appropriate criteria, to be used for evaluating commercial services
- » Detail potential commercial service opportunities, given national and Denali-specific trends in outdoor recreation and as recommended by park staff, volunteers, partners, visitors, members of the public, and other relevant stakeholders, and identify high-priority commercial services opportunities

Ultimately, this strategy document seeks to provide clarity and consistency for park management when making decisions regarding commercial services and for businesses and the broader public when interpreting these decisions.

A variety of stakeholders inside and outside the park provided input throughout the development of this strategy. Incorporating feedback from park staff, businesses, visitors, and community organizations ensures that the document represents the perspective of the park's diverse stakeholders. This CSS is written as a 10-year strategy but can be updated to respond to changing conditions or proposals for new services. The strategy does not act as a compliance document nor does it assess environmental impact.

1.2 HOW TO USE THIS STRATEGY

This strategy anticipates several audiences, including Denali park management, regional management, current and potential businesses that partner with Denali, and the visiting public.

PARK MANAGEMENT

The primary purpose of this strategy is to provide decision-making guidance to park management and staff. Use of the necessary and appropriate criteria (described in chapter 6) supports clear and consistent assessments of when, where, and how a commercial service can be authorized in the park, which further ensures that management of the park's commercial services is aligned with the NPS mission and Denali's vision.

NPS ALASKA REGION

At the regional level, this strategy communicates Denali-specific trends and needs, as well as the park's interpretation of the necessary and appropriate criteria. It ensures that Denali's commercial services strategies align with national and regional strategies, allowing for a base level of consistency for visitors to and businesses operating in multiple national parks in the Alaska region.

CURRENT AND POTENTIAL BUSINESS PARTNERS

Business partners may use this strategy to understand the framework within which the park makes decisions regarding commercial services: when businesses can operate within the park, whether a business is likely to be authorized through a contract or a CUA, and how wilderness designation affects commercial activities, particularly in the two million acres of the "Old Park." Businesses can also identify high-potential new services given trends in recreation in the park, so as to better serve Denali's evolving visitors.



1.3 METHOD

NPS Business Plan Internship (BPI) consultants Michael Meehan and Nancy Yang prepared this strategy in the summer of 2017. The process began with a review of Denali park documents, including the 2006 Backcountry Management Plan, 2011 Visit Characteristics, 2012 Vehicle Management Plan, 2013 Bus Shuttle System Analysis, and 2014 Foundation Statement.

The consultants analyzed visitor use data reported by the park and commercial operators between 2007 and 2016, including annual financial reports from concessioners and CUA-holders, backcountry permit data, bus ridership data, campground registration data, Discovery Hike signups, and recreational visitation by year and month. NPS-wide data on CUAs, as well as data from comparable NPS units, were also used to contextualize trends. To obtain stakeholder input, consultants interviewed park staff, concessioners, CUA-holders, members of the local community, and businesses and organizations involved in Alaska state tourism. Consultants worked with park management to develop the park's interpretation of the necessary and appropriate criteria for evaluating commercial services. Finally, consultants considered new services and worked with park management to analyze and prioritize these services by impact and feasibility.



1.4 STRATEGY STRUCTURE

This CSS consists of eight chapters and supporting appendices. The document surveys the park's current visitation and recreational uses, sets forth the management principles and commercial services policies that govern the park, and considers potential services for the future.

Chapter 1: Introduction

Introduces the purpose, benefits, audiences, and method of this strategy.

Chapter 2: Park Overview

Summarizes the 100-year history of Denali and what makes it unique as an NPS unit.

Chapter 3: Management Principles

Highlights the legislation and management policies that inform decisions, especially those regarding commercial services, at the park.

Chapter 4: Visitation and Park Usage

Reviews visitation characteristics—including visitor demographics, economic impact, and recreational habits—and how they have changed over time.

Chapter 5: Commercial Services Overview

Outlines NPS-wide commercial services policy, as well as the current state of commercial activities in Denali.

Chapter 6: "Necessary" and "Appropriate" Criteria

Defines the park's interpretation of these criteria, including their application to wilderness areas.

Chapter 7: Winter and Shoulder Seasons

Explores characteristics of winter and shoulder-season visitation and considers how visitation during the off-peak seasons could expand.

Chapter 8: Trends and Opportunities in Recreational Activities

Describes recreational trends across the country and in Denali specifically. Based on trends and stakeholder interviews, this section considers potential new commercial services and where they might be offered in the park.

Park Overview

This chapter highlights the unique history and characteristics of Denali National Park and Preserve and why the park draws nearly 600,000 visitors each year from all over the world.

While studying Dall sheep near the Toklat River in the winter of 1907–8, Charles Sheldon, a hunter and naturalist, noticed commercial meat hunters taking thousands of sheep from the area. At that rate, he knew the species could not survive much longer. Motivated by his observations, and enthralled with the wildlife and surrounding landscape, Sheldon returned to Washington, DC, to lobby Congress to set the area aside as a national park. With the help and persistence of John B. Burnham, Belmore Browne, George Grinnell, and many others, Sheldon's vision became a reality on February 26, 1917, when President Woodrow Wilson signed the bill establishing Mount McKinley National Park.

Mount McKinley National Park was the first national park established for wildlife protection, home not only to the Dall sheep but to 213 other wildlife species, such as grizzly bears, caribou, moose, black bears, wolves, and 160 species of birds (including golden eagles, ravens, mew gulls, and ptarmigan).²

It is common to see snowshoe hare, hoary marmot, shrew, pika, Arctic ground squirrel, and beaver. Occasionally, visitors also spot Canadian lynx, wolverines, and red foxes.

During Sheldon's initial trip into the Toklat River to study the Dall sheep, he sought the help and expertise of a dog musher named Harry Karstens. This was a great choice: not only would Karstens go on to be the climbing leader of the four-man team credited as the first to summit Denali on June 7, 1913, but he also became the first park ranger hired in 1921.³ As the first superintendent of Mount McKinley National Park, Karstens had the daunting task of bringing poaching of the park's wildlife under control—and the only way to effectively travel in the winter was by mushing with a team of dogs.⁴ This led to the foundation of the park kennels and the 1929 construction of the kennel building still extant today. It is home to the only working dog kennel in the National Park System. Today, the dogs average 3,000 miles each year while patrolling the park's interior during the winter. Each summer, the sled dog demonstrations at the kennel attract nearly 50,000 visitors.



DENALI NATIONAL PARK AND PRESERVE, "DENALI 2017 FACT SHEET," NATIONAL PARK SERVICE, ACCESSED JUNE 14, 2018, HTTPS://HOME.NPS.GOV/DENA/LEARN/MANAGEMENT/UPLOAD/REVISED-DENA-2017-FACT-SHEET.PDF.

³ DENALI NATIONAL PARK AND PRESERVE, "KENNELS HISTORY," NATIONAL PARK SERVICE, ACCESSED JUNE 14, 2018, HTTPS://WWW.NPS.GOV/DENA/PLANYOURVISIT/KENNELS-HISTORY.HTM.

^{4 &}quot;KENNELS HISTORY."



Simultaneous to the founding of the dog kennel, Karstens and his growing team addressed travel during the summer months. The Alaska Railroad provided access to the eastern boundary of the park beginning in 1923, but the rugged terrain made travel through the interior extremely difficult. The construction of the Denali Park Road began in 1923; nearly 15 years and \$5,000 later, the 92.5-mile road traveled west and connected the park entrance to the gold-mining town of Kantishna, where a few remaining prospectors from the 1904–5 gold rush still lived. 5 With the opening of the George Parks Highway in 1972, visitation to the park increased, and authorities saw the need to restrict private vehicle access beyond the Savage River. Additionally, in 1986, the park limited total vehicle trips in the peak season to 10,512.6 Today, a concessioner operates the tan-and-green tour buses that navigate the park road, allowing visitors to experience the wilderness with minimal impact.

On December 2, 1980, Congress passed the Alaska National Interest Land Conservation Act (ANILCA). The act turned 104 million acres of Alaskan land into national parks and preserves, national forests, and national fish and wildlife refuges. About half of the land—50 million acres—was set aside as wilderness. Denali National Park and Preserve initially consisted of

2.146.000 acres of land under the name Mount McKinley National Park; the signing of ANILCA grew the park's land holdings to 6,075,030 acres, making it slightly larger than the state of New Hampshire. Additionally, ANILCA changed the park's name to Denali National Park and Preserve. The legislation also designated the original 2.146.000 acres as wilderness under the 1964 Wilderness Act. Wilderness is defined as "an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain."7 This new designation prohibited the use of motorized equipment and vehicles in the Old Park boundary but still allowed for the use of the dogsled team and other traditional activities.

Today, as it was during the park's foundation 100 years ago, the land is raw, untouched, and varied; it includes forest, wide riverbeds, alpine tundra, lakes, and prominent mountains. The park road provides access to the northeast and central parts of the park. Nearly 15 percent of the park is covered with glaciers, providing challenging terrain for mountaineers and explorers. The weather can reach extremes above 90 degrees Fahrenheit in the summer and below negative 50 degrees Fahrenheit in the winter; however, the average temperatures in January and July are 2 degrees and 55 degrees Fahrenheit, respectively.8

The park is also home to the tallest mountain in North America: Denali, or "the High One." At 20,310 feet, it sits atop the Alaska Range. The mountain attracts many ambitious mountaineers who want to tackle the challenge of scaling one of the "Seven Summits" of the world.

The mission of the NPS to both conserve park resources and provide for their use and enjoyment allows the park's scenic landscapes, trail-less wilderness, active wildlife, and rich history of exploration and survival to captivate the interest and excitement of visitors for years to come.



PREVIOUS PAGE: AN ADULT SOW.

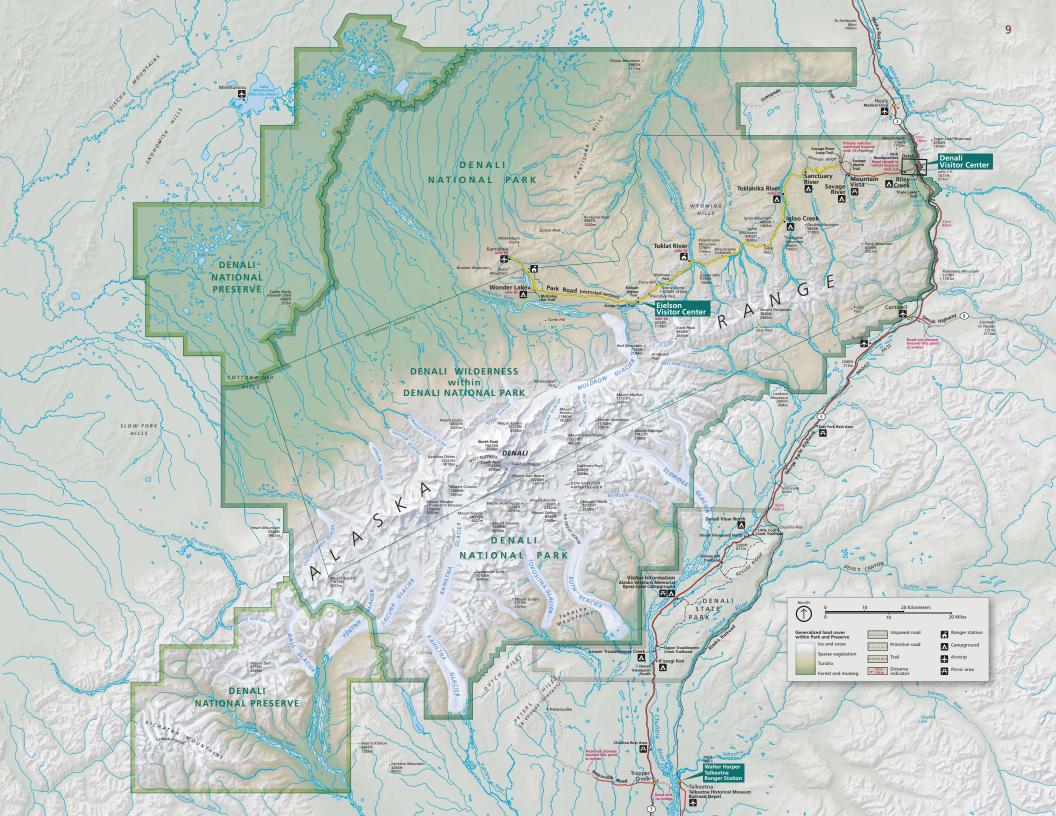
A MOUNTAINEERING TEAM HIKING UP TO THE KAHILTNA GLACIER.
NEXT PAGE: DENALI NATIONAL PARK AND PRESERVE MAP.

⁵ DENALI NATIONAL PARK AND PRESERVE, "HISTORY OF THE PARK ROAD," NATIONAL PARK SERVICE, ACCESSED JUNE 14, 2018, HTTPS://WWW.NPS.GOV/DENA/LEARN/NATURE/ROAD-HISTORY.HTM.

⁶ "HISTORY OF THE PARK ROAD."

⁷ THE WILDERNESS ACT OF 1964, 16 U.S.C. §§ 1131–1136 (1964).

^{8 &}quot;DENALI 2017 FACT SHEET."



3 Management Principles

Federal lands are managed in accordance with governing laws, regulations, and policies. Parks also operate under the NPS policies and guidance, with additions of any park-specific management plans. This chapter highlights the pertinent internal and external documents and principles that guide decision-making at the park.

3.1 PARK PURPOSE9

Why did Congress and the president establish the park as a unit of the National Park System? As paraphrased and condensed from multiple pieces of legislation, the park was created to:

Cultural Resources

» Protect historic archeological sites

Research

» Maintain opportunities for scientific research in undisturbed ecosystems

Natural Resources

- » Preserve extensive, unaltered natural ecosystems
- » Protect and interpret the mountain (Denali) massif
- » Preserve wilderness resource values and related recreational opportunities

Animals

» Preserve animals

Subsistence

- » Provide the opportunity for continued subsistence activities
- » Protect resources related to subsistence

Visitor Experience

- » Facilitate people's enjoyment and benefit
- » Preserve scenic beauty
- » Provide opportunities for mountaineering and wilderness recreation

⁹ NATIONAL PARK SERVICE, DENALI NATIONAL PARK AND PRESERVE FOUNDATION STATEMENT (DENALI PARK, ALASKA: NATIONAL PARK SERVICE, 2014), 10.



3.2 SIGNIFICANCE STATEMENTS¹⁰

Why did Congress and the president establish the park as a unit of the National Park System?

LARGE PROTECTED AREA

At 6,075,030 acres—the third-largest park in the National Park System—Denali National Park and Preserve maintains vast landscapes. These landscapes are an extensive patchwork of subarctic ecosystems largely undisturbed by humans.

MOUNTAINS AND GLACIERS

The park's boundary encompasses a significant portion of the Alaska Range, which spawns many large glaciers (encompassing nearly 941,630 acres) and includes the tallest peak in North America. The 18,000-foot base-to-summit vertical relief of Denali is among the greatest in the world.

WILDLIFE AND HABITAT

Denali is the first national park established for wildlife protection. The park's size and ecological integrity allow it to preserve sufficient habitat for Dall sheep, grizzly bears, wolves, moose, caribou, golden eagles, and 208 other species of wildlife. Visitors can observe these species in natural habitats ranging from alpine tundra to lowland forests and wetlands.

MOUNTAINEERS NAVIGATING THE CREVASSES.

SCENIC RESOURCES AND AIR QUALITY

With its rugged, ice-draped mountains; rolling tundra; and broad river valleys, the park offers expansive vistas and has the highest level of environmental protection possible (Class 1 Airshed) under the Clean Air Act, a federal law designed to control air pollution on a national level.

CULTURAL RESOURCES

As over 300 cultural sites testify, people have moved through and lived on the landscape since time immemorial, from the prehistoric Alaska Natives to early explorers, miners, and eventually park visitors. The National Register of Historic Places recognizes 15 of these sites due to their cultural significance.

MOUNTAINEERING

As the highest peak in North America, and one of the "Seven Summits," Denali captivates the human imagination and annually attracts roughly 1,250 climbers from around the world who are up for the challenge.

WILDERNESS RECREATION

The park maintains 2,124,783 acres of designated wilderness and offers superlative opportunities for remote wilderness recreation that are relatively easy to access, compared to other Alaskan wilderness. Evidence of human use is minimal.

PALEONTOLOGICAL RESOURCES

The park is one of the premier protected areas in North America for understanding the ecological relationships among species and environments at the end of the Mesozoic era (the Age of Dinosaurs), about 70 million years ago. Researchers have uncovered thousands of trace fossils of dinosaurs and other species in the Cantwell Formation since 2005, when they first identified a dinosaur track.



¹⁰ DENALI NATIONAL PARK AND PRESERVE FOUNDATION STATEMENT, 20–25.



3.3 FUNDAMENTAL RESOURCES AND VALUES¹¹

What park resources and values are primary to the park's purpose and significance?

- » Wildlife populations, wildlife habitat, and the processes and components of the park's natural ecosystem
- » Wilderness character, wilderness resource values, and wilderness recreational opportunities
- » Scenic and geologic values of Denali and the surrounding mountain landscape
- » Visitor enjoyment and inspiration from observing wildlife in its natural habitat and other natural features

3.4 OTHER IMPORTANT RESOURCES AND VALUES¹²

What park resources and values are important for park management and visitors?

- » Historic, archeological, and ethnographic resources
- » Paleontological resources
- » Air quality
- » Subsistence resources and opportunities
- » Scientific research, education, and interpretation about natural ecosystems and geologic features and processes

There are several guiding laws, plans, and initiatives that influence the management of the park. The following sections present these dicta in chronological order to highlight their significance and impact on park decision-making.

3.5 THE ORGANIC ACT OF 1916

The Organic Act created the NPS and established the agency's fundamental purpose to "conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." ¹³ This statement represents the most basic mission of the park.

3.6 THE 1964 WILDERNESS ACT14

The Wilderness Act created the National Wilderness Preservation System and recognized wilderness as "an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain." The act further defined wilderness as "an area of undeveloped Federal land retaining its primeval character and influence without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions."

The Wilderness Act prohibits permanent roads and commercial enterprises, except commercial services that may provide for recreational or other purposes of the Wilderness Act. Wilderness areas generally do not allow motorized equipment, motor vehicles, mechanical transport, temporary roads, permanent structures, or installations (with exceptions in Alaska for some traditional activities). Forces of nature affect wilderness areas; however, the Wilderness Act does acknowledge the need for land managers to provide for human health and safety, protect private property, control insect infestations, and fight fires within the area.



DALL SHEEP.

- ¹¹ DENALI NATIONAL PARK AND PRESERVE FOUNDATION STATEMENT, 26.
- ¹² DENALI NATIONAL PARK AND PRESERVE FOUNDATION STATEMENT, 27.
- ¹³ NATIONAL PARK SERVICE, "QUICK HISTORY OF THE NATIONAL PARK SERVICE," ACCESSED JUNE 14, 2018, HTTPS://WWW.NPS. GOV/ARTICLES/QUICK-NPS-HISTORY.HTM.
- ¹⁴ THE WILDERNESS ACT OF 1964, 16 U.S.C. §§ 1131–1136 (1964).

THREE: MANAGEMENT PRINCIPLES



3.7 ALASKA NATIONAL INTEREST LANDS CONSERVATION ACT (ANILCA)¹⁵

ANILCA expanded or formed most of the federal lands in Alaska. Its passage in 1980 marked the culmination of more than 20 years of deliberation on federal land claims after the establishment of Alaska's statehood in 1959.

ANILCA enlarged the park by over 4,000,000 acres, renamed it Denali National Park and Preserve, and stipulated broad purposes of the conservation system units in Alaska. These purposes are to:

- » Preserve lands and waters for the benefit, use, education, and inspiration of present and future generations
- » Preserve unrivaled scenic and geological values associated with natural landscapes
- » Maintain sound populations of and habitat for wildlife species
- » Preserve extensive, unaltered ecosystems in their natural state
- » Protect resources related to subsistence needs
- » Protect historic and archeological sites
- » Preserve wilderness resource values and related recreational opportunities, such as hiking, canoeing, fishing, and sport hunting
- » Maintain opportunities for scientific research in undisturbed ecosystems
- » Provide the opportunity for continued subsistence living for rural residents

Further, Section 202 of ANILCA requires management of park additions to:

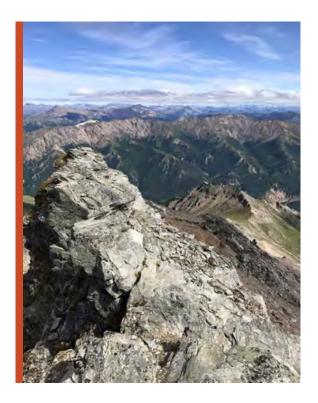
- » Protect and interpret the entire mountain massif and the additional scenic mountain peaks and formations
- » Protect populations of and habitats for fish and wildlife, including brown/grizzly bears, moose, caribou, Dall sheep, wolves, swans, and other waterfowl
- » Provide continued opportunities, including reasonable access, for mountain-climbing, mountaineering, and other wilderness recreational activities

Denali Wilderness

Section 701 of ANILCA designated the Denali Wilderness under the Wilderness Act, including 99 percent of the former Mt. McKinley National Park. According to the Wilderness Act, these lands are to be "administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness." 16

Denali National Preserve

Section 1313 of ANILCA addresses the purpose of national preserves created by the act. A national preserve in Alaska is administered and managed as a unit of the National Park System in the same manner as a national park except in its permitting of sport fishing, sport wildlife hunting, subsistence activities, and trapping under any applicable state and federal laws and regulations.¹⁷



THE RIDGE LOOKING EAST FROM MOUNT HEALY.

- ¹⁵ THE ALASKA NATIONAL INTEREST LANDS CONSERVATION ACT, 16 U.S.C. §§ 3101–3233 (1988).
- ¹⁶ THE WILDERNESS ACT OF 1964, 16 U.S.C. §§ 1131–1136 (1964).
- DENALI NATIONAL PARK AND PRESERVE, "SUBSISTENCE HUNTING," NATIONAL PARK SERVICE, ACCESSED JUNE 14, 2018, HTTPS://WWW.NPS.GOV/DENA/LEARN/SUBSISTENCE -HUNTING.HTM.



3.8 2006 BACKCOUNTRY MANAGEMENT PLAN

The 2006 Backcountry Management Plan provides specific guidance and direction for backcountry management from 2006 to 2026. The plan includes backcountry areas in the original Mt. McKinley National Park (Old Park) and the areas added to the park with the passing of ANILCA. It further delineates desired conditions for the visitor experience, resource protection, and user conflict issues.

3.9 2012 VEHICLE MANAGEMENT PLAN

The 2012 Vehicle Management Plan seeks to improve the conditions along the 92.5-mile-long Denali Park Road. It aims to provide a high-quality experience for visitors; protect wilderness, scenery, wildlife, and other park resources; and maintain the road's unique character. This plan sets the maximum level of daily vehicle use at 160 vehicles per 24 hours from the period spanning the Saturday before Memorial Day through the second Thursday after Labor Day. Several times each season, park management evaluates performance against set standards through reviewing key indicators related to traffic levels, behavior, and patterns.

3.10 ZERO LANDFILL INITIATIVE¹⁸

A partnership between the NPS, the National Parks Conservation Association, Subaru of America, and park partners is working to find a way to divert waste and lessen park visitors' impact on the environment. This initiative began at three iconic national parks: Grand Teton National Park in Wyoming, Yosemite National Park in California, and Denali National Park and Preserve. These parks collectively generated 16.6 million pounds of visitor waste in 2013. Of that waste, 41 percent (6.9 million pounds) was kept from landfills through recycling, composting, and reuse.

By the end of 2017, Denali and its partners hoped to double the amount of waste the parks divert from landfills. Waste-reduction strategies implemented at Denali include:

- » Establishing composting opportunities for both employee and visitor waste
- » Improving recycling options at visitor centers and rest stops
- » Replacing paper cups with reusable coffee cups in the dining facility
- » Spreading the word through the social media campaign #DontFeedtheLandfills
- » Working with the Denali Borough and other key stakeholders to improve recycling opportunities for gateway businesses

18 DENALI NATIONAL PARK AND PRESERVE, "ZERO LANDFILL INITIATIVE," NATIONAL PARK SERVICE, ACCESSED JUNE 14, 2018, HTTPS://WWW.NPS.GOV/DENA/GETINVOLVED/ZERO -LANDFILL.HTM.



PARK STAFF CONDUCTING ROAD MAINTENANCE.



3.11 2016 GREEN PARKS PLAN¹⁹

In 2012, the NPS released the Green Parks Plan, which provides a broad sustainability vision for the agency and sets supporting goals and objectives. Denali has reacted to the goals set forth in this plan by increasing recycling rates, installing renewable energy systems, and constructing an energy-efficient building. In 2016, the NPS updated the Green Parks Plan, outlining 10 goals:

CONTINUOUSLY IMPROVE ENVIRONMENT PERFORMANCE

The NPS will meet and exceed the requirements of all applicable environmental laws and adopt sustainable best practices in all facility operations.

BE CLIMATE FRIENDLY AND CLIMATE READY

The NPS will reduce greenhouse gas emissions and adapt facilities at risk from climate change.

BE ENERGY SMART

The NPS will improve facility energy performance and increase reliance on renewable energy.

BE WATER WISE

The NPS will improve facility water use efficiency.

GREEN OUR RIDES

The NPS will transform our fleet and adopt greener transportation methods.

BUY GREEN AND REDUCE, REUSE, RECYCLE

The NPS will purchase environmentally friendly products and increase waste diversion and recycling.

PRESERVE OUTDOOR EXPERIENCES; PROMOTE HEALTHY ENGAGEMENT

The NPS will promote healthy outdoor experiences and minimize the impact of facility operations on the environment.

STRENGTHEN SUSTAINABILITY PARTNERSHIPS

The NPS will incorporate sustainability initiatives into new and existing partnerships.

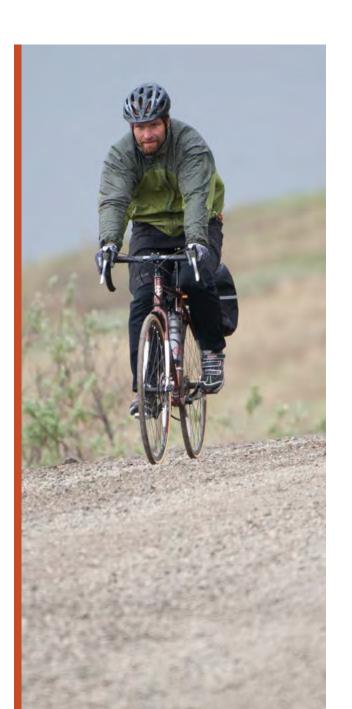
FOSTER SUSTAINABILITY BEYOND OUR BOUNDARIES

The NPS will engage visitors about sustainability and invite their participation.

GREEN OUR GROUNDS

The NPS will enhance the sustainability of our landscapes.

A VISITOR CYCLING ON THE PARK ROAD



¹⁹ NATIONAL PARK SERVICE, GREEN PARKS PLAN: ADVANCING OUR MISSION THROUGH SUSTAINABLE OPERATIONS (2016).

Visitation and Park Usage

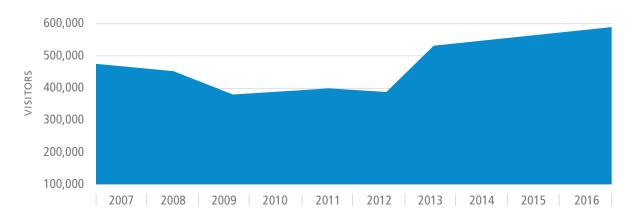
Denali National Park and Preserve draws visitors from all over the world. This chapter outlines visitor trends, demographics, economic impact, as well as recreational habits at the park. Two trends are clear: visitation is on the rise, and the overwhelming majority of visitors come in the peak summer months, which is reflected in the use of visitor services provided by both the park and concessioners.

4.1 VISITATION

In 2016, Denali received 587,412 visits.²⁰ Visitation has increased each year since 2012; overall, visitation in 2016 represents a 28 percent increase from visitation 10 years ago (see fig. 2).

In comparison, visitation to all other NPS units in Alaska has remained relatively constant since 2007 (see fig. 3). Over the same 10 years, the number of summer out-of-state visitors to Alaska has increased 8 percent and likely played a role in the increased visitation to Denali.²¹

FIGURE 2. ANNUAL VISITATION TO DENALI, 2007-16



^{20 &}quot;DENALI NATIONAL PARK AND PRESERVE: ANNUAL PARK RECREATION VISITATION (1904–LAST CALENDAR YEAR)," NATIONAL PARK SERVICE VISITOR USE STATISTICS (2017).

^{21 &}quot;ALASKA VISITOR STATISTICS PROGRAM 7: SUMMER 2016," PREPARED BY MCDOWELL GROUP FOR ALASKA TRAVEL INDUSTRY ASSOCIATION



The park's summer season is between late May and mid-September. Most—about 77 percent—of park visitation occurs in June, July, and August (see fig. 4). Visitors arriving in the spring or fall (before May 20 or after the second full week of September) face unexpected weather—which determines park road accessibility—and limited services.

FIGURE 3. COMPARATIVE ANNUAL VISITATION, 2007-16

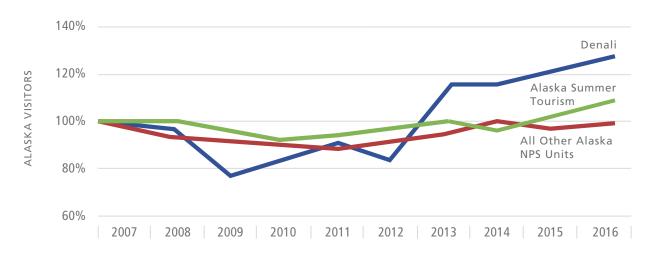
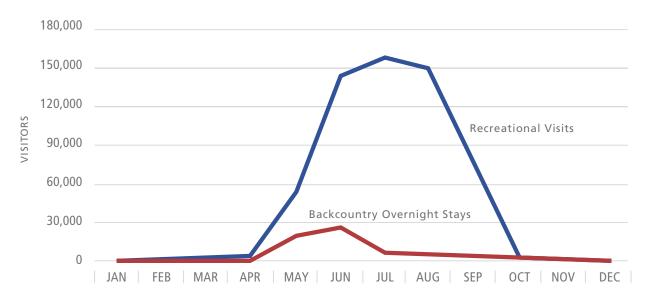


FIGURE 4. VISITATION TO DENALI BY MONTH, 2016



4.2 ECONOMIC IMPACT

In 2016, park visitors spent an estimated \$604.9 million in local communities, about 67 percent of which was spent on transportation and lodging (see fig. 5).²²

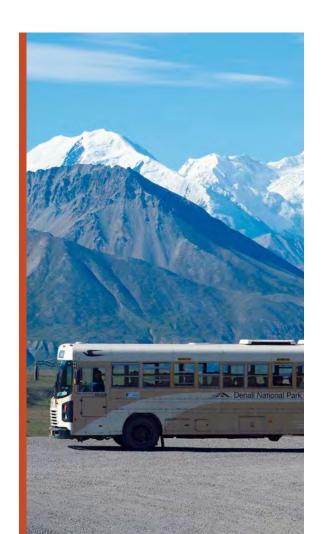
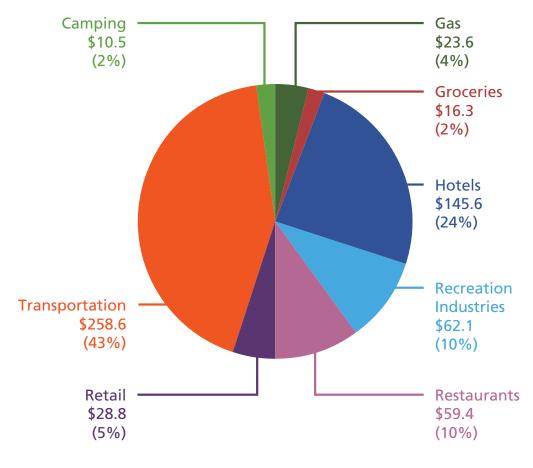


FIGURE 5. DENALI VISITOR SPENDING (MILLIONS), 2016



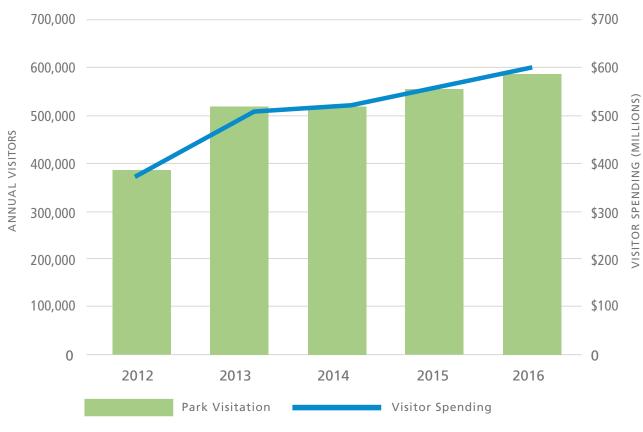
A PARK BUS TURNING AROUND AT STONY OVERLOOK.

^{22 &}quot;2016 NATIONAL PARK VISITOR SPENDING EFFECTS: ECONOMIC CONTRIBUTIONS TO LOCAL COMMUNITIES, STATES, AND THE NATION," NATURAL RESOURCE REPORT, NPS/NRSS/EQD/NPR-2017/1421.

These expenditures supported a total of 7,700 jobs, \$286.4 million in labor income, \$530.1 million in value added, and \$864.4 million in economic output in local economies. Visitor spending at Denali is closely correlated to annual visitation and has increased almost 63 percent, from \$371.5 million in 2012 (see fig. 6).



FIGURE 6. DENALI VISITATION AND VISITOR SPENDING, 2012-16



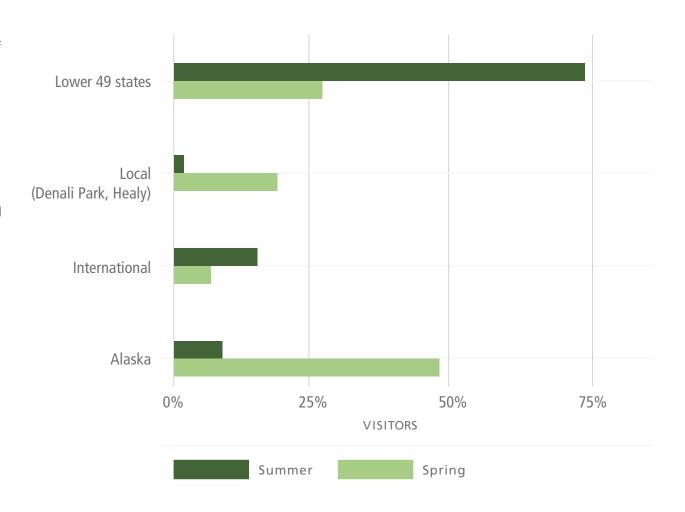


4.3 DEMOGRAPHICS

A 2011 NPS study on park visitation found that in the spring shoulder season, about 70 percent of Denali visits were from Alaska, with 19 percent of those visitors being local (from within 20 miles of the park entrance).²³ During the summer season, however, the trend is reversed: residents from the lower 49 states dominate, accounting for 72 percent of visits (see fig. 7).

There is also a difference in length of stay in the park area: visitors from the lower 49 states and abroad spent, on average, 2.5 nights in the area; nonlocal visitors from Alaska spent 1.6 nights and were more likely to be taking a day trip.

FIGURE 7. DENALI VISITOR RESIDENCY, SPRING AND SUMMER, 2011



²³ PETER J. FIX, ANDREW ACKERMAN, AND GINNY FAY, 2011 DENALI NATIONAL PARK AND PRESERVE VISIT CHARACTERISTICS (FORT COLLINS, COLORADO: NATIONAL PARK SERVICE, 2013).



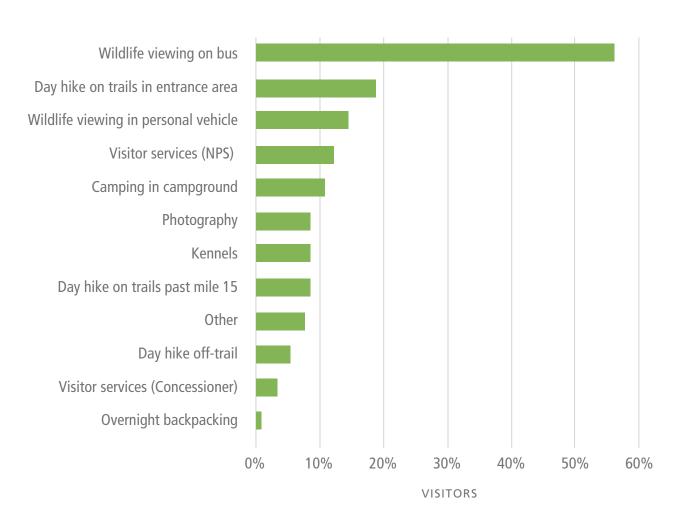
4.4 PARK USAGE

Denali is over six million acres in size but has very few trails. This is intentional, as the park seeks to preserve wilderness recreation; in addition, river bars and alpine ridges provide attractive trail-free hiking routes. Some marked trails exist around Denali Visitor Center, Eielson Visitor Center, Kantishna, and the Savage River area. Most visitors come to the park to see wildlife, and the best opportunity to do so is while on buses on the park road.

As of 2011, "wildlife viewing on the bus" was the primary activity for 56.9 percent of summer peak-season visitors (see fig. 8).²⁴ The next most frequent activity was day hiking on trails in the entrance area, though participation was much lower than for riding the bus (19.4 percent, compared to 56.9 percent).

Notably, wildlife viewing on the bus was the dominant activity for visitors from the lower 49 states; day hiking on trails in the entrance area had the highest participation by local Alaskans, who constituted 7 percent of all day hikers. Other popular activities included wildlife viewing in a personal vehicle, visitor services at the visitor center or the Murie Science and Learning Center, and camping.

FIGURE 8. DENALI VISITOR PARTICIPATION BY ACTIVITY, SUMMER 2011



²⁴ FIX ET AL., 2011 VISIT CHARACTERISTICS.



BUS RIDERSHIP

Visitors to the park can take either a tour bus, with interpretive narration provided by the driver, or a transit bus, which does not include formal, interpretive narration. Tour options include:

- » Tundra Wilderness Tour: Seven- to eight-hour tour to Stony Hill Overlook, at mile 62 of the park road; the most popular of the tours, it draws 44 percent of all bus passengers
- » Denali Natural History Tour: Four-and-a-halfto five-hour tour to Teklanika River, at mile 30 of the park road
- » Kantishna Experience Tour: 11- to 12-hour tour to Kantishna, at the end of the park road, featuring an NPS ranger, who joins the tour at Wonder Lake

Since 2012, passengers taking the transit bus have increased by 27 percent, followed by a 21 percent increase in ridership for those choosing the Tundra Wilderness Tour (see fig. 9). The Denali Natural History Tour, however, has seen a drop in ridership, from 71,325 passengers in 2012 to a little over 61,000 in 2016.

Monthly bus ridership reflects the seasonality of visitation to the park, with the number of passengers on buses peaking in July. Across the summer months, about 49 percent of each month's visitors ride a bus, and two-thirds of those bus passengers opt for the tour buses (see fig. 10).

FIGURE 9. CHANGE IN PASSENGERS BY BUS TYPE, 2012-16

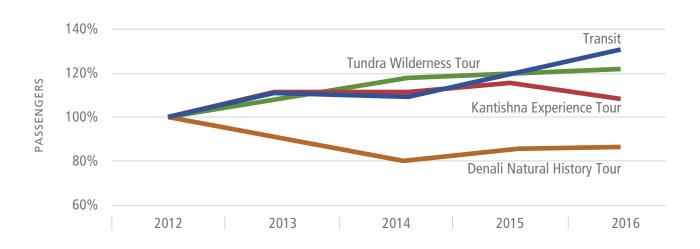
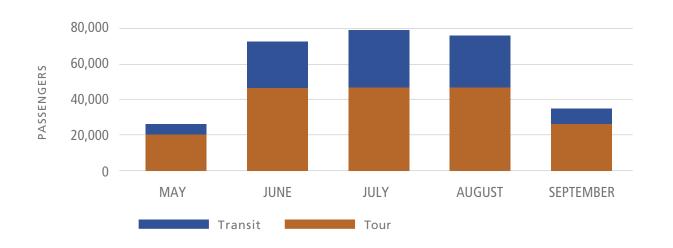


FIGURE 10. BUS RIDERSHIP, 2016



CAMPING

In addition to experiencing the park by bus, visitors may choose to camp in a tent, RV, or other vehicle in one of the park's six established campgrounds.

Data from 2016 show that campground usage peaked in July, with over 20,000 user nights (see fig. 11). About 30 percent of user nights took place in RVs, which are allowed in three campgrounds: Riley Creek, Savage River, and Teklanika River.

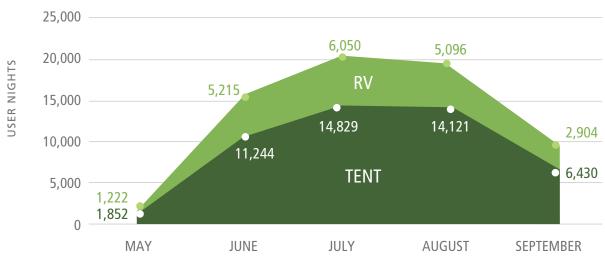


TABLE 1. DENALI NATIONAL PARK AND PRESERVE CAMPGROUNDS

	Location	Dates Open	Capacity
Riley Creek	Mile 0.25	Year-round*	147 sites, 20 of which are on a first-come, first-served basis
Savage River	Mile 14	May 19 to mid-September	32 sites
Sanctuary River	Mile 22	May 20 to mid-September	7 sites, no advance reservations are possible
Teklanika River	Mile 29	May 20 to mid-September	53 sites
Igloo Creek	Mile 35	May 20 to mid-September	7 sites, no advance reservations are possible
Wonder Lake	Mile 85	June 8 to mid-September	28 sites

^{*} Riley Creek campground is open year-round, but reservations are only accepted May 15 through mid-September.

FIGURE 11. CAMPGROUND USER NIGHTS, 2016



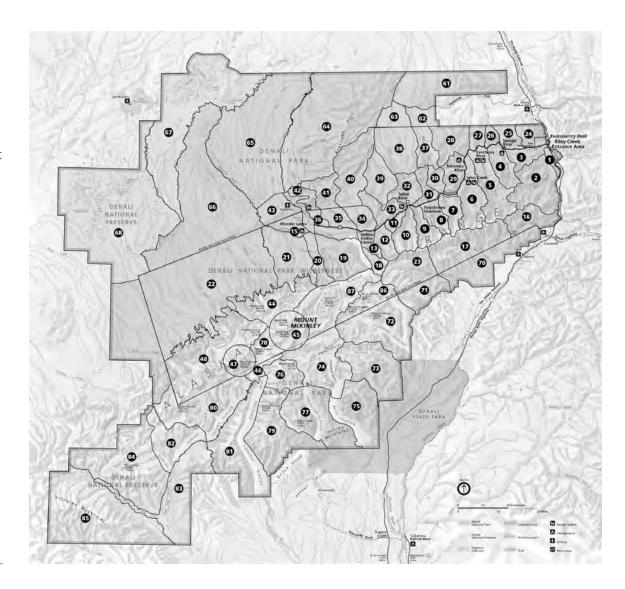
BACKPACKING

Visitors can also backpack into Denali's millions of acres of wilderness. The park is divided into units, most of which have limits for how many visitors can camp overnight. Backpacking permits for each unit are issued in person at the Backcountry Information Desk, where rangers can check visitors' planned itineraries and provide guidance.

Backcountry permit data show that units 10, 9, 6, and 8 (West Branch Upper Toklat River, East Toklat River, Upper Teklanika River, and Polychrome Glaciers) had the most number of user nights in 2016 (see fig. 12).

Units 11, 12, and 13 (Stony Dome, Sunset Glacier, and Mount Eielson) were occupied more than 70 percent of available user nights in 2016. Some units located farther away from the park road (units 17, 23, 37, 38, 40) have much lower utilization and were occupied less than 5 percent of the season.

FIGURE 12. MAP OF DENALI BACKCOUNTRY UNITS

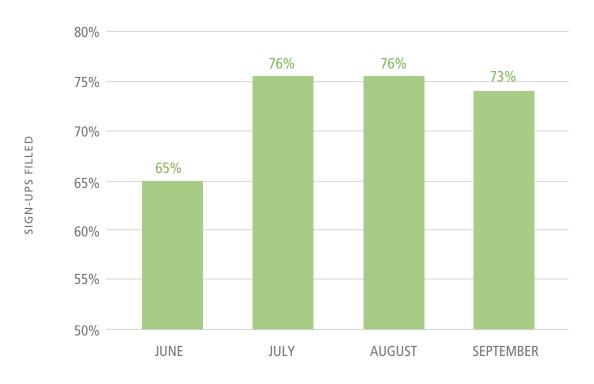


DISCOVERY HIKES

Discovery Hikes are ranger-guided day hikes designed to introduce visitors to hiking in the park's landscape. They can include travel through uneven terrain, small stream crossings, close encounters with dense vegetation, and unpredictable weather. These hikes are intended to provide a memorable "walk in the park."

Approximately two hikes are offered each day during the summer, and each hike has a capacity limit of 11 people, to reduce human impacts on vegetation in the wilderness. Discovery Hikes are offered beginning June 8; their end date is determined by the transit shuttle schedule. Following general visitation trends, Discovery Hike sign-ups tend to peak in July and August, when they average around 76 percent filled.

FIGURE 13. PERCENT OF DISCOVERY HIKE SIGN-UPS FILLED, 2012-16





5 Commercial Services Overview

The NPS defines commercial services as any product, activity, or service offered to park visitors that uses park resources, and for which compensation is made to a third party. By law, all commercial services must be authorized in writing by the park superintendent. The two most common mechanisms for delivering commercial services are Commercial Use Authorizations (CUAs) and concession contracts. This chapter outlines the difference between CUAs and concession contracts, and then takes a look at the current commercial services in the park.

5.1 COMMERCIAL USE AUTHORIZATIONS

CUAs are one- or two-year permits for commercial activities making incidental use of the park. A CUA provides a simpler means of authorizing suitable commercial services to park visitors than a concession contract. CUA services must be deemed appropriate for the park unit but do not have to be considered necessary (see chapter 7 for a full discussion of the necessary and appropriate criteria).

Parks grant CUAs through noncompetitive and competitive processes. The number of CUAs issued for any given activity may be capped in accordance with park policies and procedures. Some reasons for doing so include implementing carrying capacity decisions, protecting sensitive ecosystems, enhancing visitor experience, and balancing visitor access between CUA and non-CUA users.

A commercial provider must apply for a new CUA at the conclusion of its term. Applications may be approved by the park contingent on park policies and conditions, as well as the provider's compliance with the permit's terms. Each authorization may contain operating conditions or stipulations that designate use, such as fee structures, defining routes, areas of the park in which a CUA-holder may operate, number of user days, and number of visitors per guide. A business may provide multiple services within the park (e.g., group camping and overnight hiking).

NPS policy classifies CUAs as either in-park or out-of-park, depending on where the service originates and terminates. In-park CUAs are those with money collection and entire business operation within park boundaries. Out-of-park CUAs are those with fee collection and tours originating outside park boundaries. Businesses holding in-park CUAs may generate no more than \$25,000 in gross revenue each year. There is no cap on gross revenue for out-of-park CUA-holders, but CUAs for businesses that generate more than \$100,000 in annual gross revenue must be reviewed by the regional office.



DENALI'S CUAS

Currently, all of Denali's CUAs are out-of-park CUAs, offering the following services:

- » Air taxi and incidental hunt transport
- » Group camping (Savage River Campground)
- » Day hiking, frontcountry
- » Overnight hiking
- » Mountaineering
- » Winter-based activities, in new park additions



5.2 CONCESSION CONTRACTS

Concession contracts are typically 10-year agreements for in-park commercial activities, though under certain financial situations, they can be issued for up to 20 years with specific approval from the NPS Director. The commercial services provided by concessioners must be considered both necessary and appropriate to operate in the park. With the exception of historical operators as defined in ANILCA Section 1307, all concession operations are approved and authorized by the NPS through the preparation of a prospectus (solicitation of offers), review of proposals, selection of concessioners, and final contract execution. These procedures are detailed in 36 CFR, 51.4.

Concession contracts are legal agreements between the Secretary of the Interior (or authorized delegate) and a concessioner, requiring the concessioner to provide certain visitor services in the park, such as food and beverage, lodging, or retail. Concession contracts contain various components, including operating and maintenance plans. Large contracts often include land, real property, and government personal property assignments in which concessioners use and take responsibility for government-owned facilities, which may also require capital improvements to new or existing facilities. Compliance with these plans is mandatory.

The 1998 Concessions Management Improvement Act established three distinct contract categories:

Category I	Concessioner is allowed to invest capital to make improvements to existing facilities or build new facilities; when any of these occur, the concessioner acquires a leasehold surrender interest (LSI) in the facility until the interest is depreciated, bought out by the government, or acquired by a new concessioner
Category II	Concessioner operates on assigned land or in an assigned concession facility but is not allowed to construct or install capital improvements
Category III	Concessioner is not assigned land or building

At the drafting of this report in 2017, Denali has 18 standing concession contracts. The largest contract—and the only Category I contract—manages the transit and tour buses that traverse Denali's only park road, the Mercantile and the

Denali Bus Depot (formally called the Wilderness Access Center) at the park entrance, Morino Grill, and park campgrounds at Riley Creek, Savage River, Sanctuary, Teklanika, and Igloo. There is also a Category II concession contract for dogsledding; the rest of the contracts are Category III and encompass air-taxi glacier landing, guided hunting, and Kantishna-based guided day hiking.

The concessioner pays franchise fees to the park for the privileges granted by a concession contract. Franchise fees can be a percentage of gross receipts or a flat fee. Minimum franchise fees are determined through a financial analysis while final franchise fees are determined through a competitive bidding process. The National Parks Omnibus Management Act of 1998 stipulates that 80 percent of the franchise fees stay at the collecting park, while the remaining 20 percent is made available by the Commercial Services Program to parks across NPS to fund a range of activities related to commercial services.

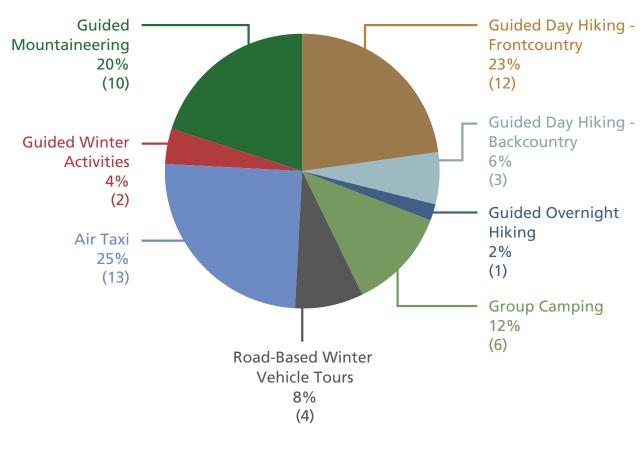
5.3 DENALI COMMERCIAL USE AUTHORIZATIONS

CUAs at Denali are currently managed at the park level.

During the last six years (2012–17), the park saw a minimum of 33 and a maximum of 51 CUAs. Companies can hold multiple authorizations, as evidenced by the 51 CUAs for 39 individual businesses operating in 2017. Visitor needs in both the frontcountry and backcountry are met through the activities shown in figure 14.



FIGURE 14. PROPORTION OF CUAS BY SERVICE, 2017



PARK DOGS OUT ON PATROL.

5.4 DENALI CONCESSION CONTRACTS

Over the last six years (2012–17), Denali has seen a minimum of 15 and a maximum of 18 concession contracts annually. Of the park's 18 concession contracts in 2017, one is Category I, one is Category II, and 16 are Category III:

CATEGORY I

The only Category I contract at the park is held by Doyon/Aramark Joint Venture. Its primary service centers on transportation along the 92.5 miles of park road; however, the concessioner is required to provide 10 visitor services:

- » Transportation
- » Retail
- » Food and Beverage
- » ATM
- » Camping
- » Laundry and Showers
- » RV/Trailer Dump Station
- » Baggage Storage
- » Wi-Fi

CATEGORY II

The only Category II contract at the park is held by Denali Dog Sled Expeditions, which provides sled-dog passenger and freight services.

TABLE 2: CONCESSION CONTRACT GROUPS

Concession Contract Type	Service Offered	Business
Category I	Transportation	Doyon/Aramark Joint Venture
Category II	Sled-Dog Passenger and Freight Services	Denali Dog Sled Expeditions
Category III Glacier Landin	Glacier Landing Air Taxi	K2
		Sheldon Air
		Talkeetna Air
		Fly Denali
	Air Taxi and Scenic Air Tour Services	Kantishna Air Taxi
	Mountaineering	Rainier Mountaineering
		Mountain Trip
		Alaska Mountaineering School
		Alpine Ascents International
		American Alpine Institute
		National Outdoor Leadership School
	Guided Hunting	Alaska Remote Guide Services
		Bearfoot Adventures
	Kantishna Guided Hiking	Camp Denali and North Face Lodge
		Denali Backcountry Lodge
		Kantishna Roadhouse

CATEGORY III

The other 16 contracts are Category III, providing visitors with options for glacier landings via air taxi, scenic air-taxi services, mountaineering, guided hunting, and guided hiking out of Kantishna.

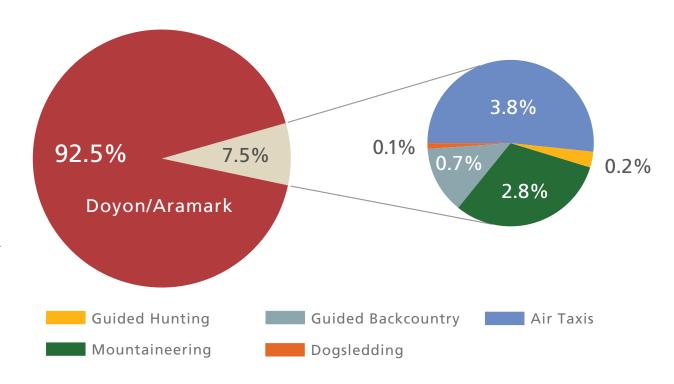


5.5 PARK REVENUE GENERATED BY COMMERCIAL SERVICES

The park utilizes the fees from CUAs to pay for the administrative and resource management costs associated with commercial services. From 2011 to 2016, the revenue collected from CUAs averaged \$12,420 annually, while the gross receipts from the CUA companies averaged \$858,923 annually, for an average fee of 1.45 percent.

In 2016, concession contracts generated \$3,806,756.29 in fee revenue for the park. The large majority—over 92 percent—of revenue collected from concessioners came from the Category I contract with Doyon/Aramark (see fig. 15). From the remaining revenue collected (7.5 percent), air-taxi companies generated 3.8 percent, guided mountaineering generated 2.8 percent, guided backcountry day hiking generated 0.7 percent, guided hunting generated 0.2 percent, and dogsledding generated 0.1 percent.

FIGURE 15. CONCESSION CONTRACT FEE REVENUE, 2016





6 "Necessary" and "Appropriate" Criteria

The NPS Concessions Management Improvement Act of 1998 states that "the development of public accommodations, facilities, and services in units of the National Park System shall be limited to those accommodations, facilities, and services that are necessary and appropriate for public use and enjoyment of the unit of the National Park System in which they are located."

Necessary and appropriate criteria help parks determine whether a commercial service enhances visitor experience without negatively impacting the park's ability to carry out its mission. They also help parks identify which commercial services can be considered for CUAs and which are eligible for concession contracts.

6.1 CRITERIA

Denali has identified necessary and appropriate criteria for commercial service operations. When park management deems a commercial service appropriate, it can then proceed to analyze where, when, and how much of the service to allow to prevent unacceptable impact on the park's resources and visitor experience.



NECESSARY CRITERIA

These criteria help answer the question, why is the service important to the park?

Concession contracts must meet at least one necessary criterion. CUAs may be issued without meeting any necessary criteria. A necessary service:

- » Provides education and/or inspiration related to the purpose of Denali National Park and Preserve
- » Provides access to areas of the park and preserve where the time or equipment necessary for visitors to reach those locations would otherwise be prohibitively lengthy or expensive; in the backcountry, service assists visitors in exploring by means that require specialized knowledge, such as mountaineering or dog mushing
- » Facilitates the protection of park resources and values
- » Provides a basic service that is not available within a reasonable distance from the park



APPROPRIATE CRITERIA

These criteria help answer the question, can the park authorize this service without compromising the reason it is a unit of the National Park System?

All commercial services, including CUAs and concession contracts, must meet all appropriate criteria. An appropriate service:

- » Is consistent with the purpose and significance of Denali National Park and Preserve
- » Adheres to federal, state, and local laws and regulations and all NPS policies
- » Maintains public health, safety, and well-being; commercial service must:
 - » Carry appropriate insurance
 - » Meet all federal, state, and local health and safety codes and regulations
 - » Provide relevant safety instruction to visitors
 - » Where applicable, be provided by certified individuals and businesses
- » Avoids unacceptable impact to park resources and values and is consistent with management plans, given existing use in the area
- » Provides enjoyment appropriate to the park while not unduly conflicting with park programs or activities, traditional or subsistence activities, or existing NPS commercial services
- » Does not exclude the general public from participating in limited recreational opportunities

6.2 COMMERCIAL SERVICES LOCATIONS

The 2006 Backcountry Management Plan divides the park into management areas, which each have social and resource condition indicators to measure appropriate use. Therefore, the location of a given commercial service in the park is critical to determining whether it is appropriate. Table 3 lists the locations of current commercial activities.



TABLE 3. LOCATIONS OF PARK COMMERCIAL ACTIVITIES, 2017

	Commercial Activity	Location
Contracts	Air taxi, glacier landing	Glacial and lake portals
	Air taxi, Kantishna	McKinley National Park Airport (INR) and Kantishna airstrip
	Bus tour and transit	Along the park road
	Day hiking, originating in Kantishna	Kantishna, Wonder Lake, parts of the Old Park
	Dogsledding	Most of the Old Park north of the Alaska Range
	Food and beverage	Frontcountry
	Guided hunting	Southwest portion of the preserve
	Mountaineering, Denali	Denali
CUAs	Air taxi, point-to-point	New park additions
	Day hiking, frontcountry	Maintained trails in frontcountry and designated wilderness
	Group camping	Savage River campground
	Guided winter activities	Frontcountry, along the park road, and new park additions
	Mountaineering, non-Denali	Alaska Range
	Overnight hiking	Backside Lake, new park additions

6.3 AUTHORIZING THROUGH CUA OR CONTRACT

When a commercial service meets at least one of the necessary criteria and all six appropriate criteria, it becomes eligible for a concession contract but may still be authorized under a CUA. When both authorizing mechanisms—contract and CUA—are possible, the following questions provide guidance to park management for determining whether a commercial service will be authorized through a CUA or a contract:

- » Does the commercial service require land assignment? If the commercial activity necessitates—or would be significantly enhanced from—a land or facility assignment, and anticipated annual gross revenue exceeds \$25,000, a concessions contract is the proper authorization tool.
- » Does the service need to be highly managed to ensure visitor safety and resource protection?

Commercial services may necessitate a high level of oversight from park management by requiring, for instance:

- » Detailed operating terms and conditions reviewed through periodic inspections and annual evaluations
- » Public health and safety oversight
- » Maintenance requirements
- » Environmental and risk management plan submissions
- » Monitoring of resource conditions, such as vegetation and campsite impact
- » Rate approvals
- » Interpretive messaging

In such cases, a concessions contract is an appropriate authorization tool.

» Does the commercial service need to be limited?

Commercial activities may be consistently limited to preserve visitor experience, minimize resource impact, or maintain the financial feasibility of the commercial opportunity. If limitations are needed, a concessions contract is most likely the appropriate authorization tool.

Does a long-term contract enhance the commercial service?
 A long-term contract may enhance the commercial service by incentivizing

a higher level of service or encouraging the commercial operator to make capital investments.

» Does the park have the organizational capacity and resources to manage an additional concessions contract?

Contracts require more staff management and oversight, including regular reporting, inspections, and evaluation. The prospectus development, selection, and evaluation process is particularly time-intensive and may take two to three years to complete for a single business opportunity. The impact on park budget and staff capacity is significant and should be considered.

Answers in the affirmative to a majority of questions above would likely indicate a need for a concessions contract over a CUA. When the park is interested in exploring a new commercial activity in the park but is unsure of visitor or market demand, a CUA may be an appropriate tool to "test" the business opportunity.

6.4 "TO THE EXTENT NECESSARY" 25

Two million acres of Denali are congressionally designated wilderness, while another four million are eligible wilderness. Commercial activities within the park must, therefore, be considered within the context of what is appropriate in wilderness.

The Wilderness Act of 1964 states. "There shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and, except as necessary to meet minimum requirements for the administration of the area . . . there shall be no temporary road, no use of motor vehicles, motorized equipment, or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation."26 The next section of the act sets forth some exceptions and advises, "Commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas." The "purposes" referred to are enumerated elsewhere in the act as "recreational. scenic, scientific, educational, conservation, and historical use."

tions that define an activity and help determine whether it is appropriate in wilderness, without regard to its commercial status:

» Does it meet the standards of the 1998 Con-

Park decision-makers consider a series of gues-

- » Does it meet the standards of the 1998 Concessions Management Improvement Act? In order to qualify as a commercial service, the service must be determined to be 1) consistent with the park's enabling legislation, 2) complementary to the park's mission and visitor service objectives, 3) necessary and appropriate, 4) not provided outside park boundaries, and 5) not the cause of unacceptable impacts.
- » Is the activity proper for realizing wilderness purpose?
 - » Is the activity consistent with laws, policies, and regulations?
 - » Is the activity consistent with the purpose and significance of the park?
 - » Does the activity impact park resources or values?
 - » Does the activity fulfill one of the purposes (recreational, scenic, scientific, educational, conservation, or historic) for wilderness?
 - » Is the activity compatible with desired conditions for wilderness character?²⁷

» Are commercial services necessary to support the activity?

In High Sierra Hikers v. Blackwell (2004), the Ninth Circuit Court of Appeals determined that wilderness managers must make a specialized finding of necessity to "show that the number of permits [or other authorizations] granted was no more than was necessary to achieve the goals of the Act." 28 The need for commercial support services is distinct from visitors' desire for commercial support when conducting the activity.

The following questions should be considered as guidance:

- » Does the commercial service significantly contribute to visitor understanding and appreciation of the park's purpose in general and wilderness in particular?
- » Are specialized skills, knowledge, or equipment required or highly advised?
- » Are introductory experiences appropriate?
- » Are special conditions or controls warranted to protect resources or the visitors themselves?
- » Is the service an essential service that is not available within a reasonable distance from the park?

²⁵ THE WILDERNESS ACT OF 1964, 16 U.S.C. §§ 1131–1136 (1964).

²⁶ WILDERNESS ACT OF 1964.

²⁷ A SUMMARY OF QUALITIES, INDICATORS, AND MEASURES OF WILDERNESS CHARACTER IS PROVIDED IN APPENDIX A.

²⁸ DECISIONS ISSUED BY THE US COURT OF APPEALS FOR THE NINTH CIRCUIT ARE BINDING WITHIN THE NINTH CIRCUIT, WHICH INCLUDES THE STATES OF ALASKA, ARIZONA, CALIFORNIA, HAWAII, IDAHO, MONTANA, NEVADA, OREGON, AND WASHINGTON.

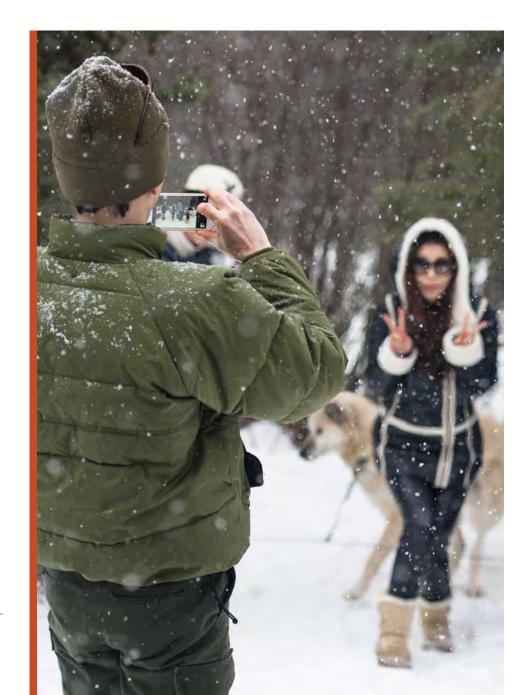
» To what extent are commercial services necessary? To identify the volume of commercial services that will be allowed, park managers will peed to understand the area's capacity to support use wh

managers will need to understand the area's capacity to support use while preserving wilderness character.

- » If use is not near capacity, managers must determine the appropriate amount of commercial services relative to noncommercial opportunities, which can be done through a visitor capacity study or by establishing a threshold that triggers further analysis.
- » If use is at or near capacity, use allocation could be redistributed between commercial and noncommercial users; alternatively, park management may determine that no commercial service is necessary.

Denali and other NPS units in Alaska fall under ANILCA, which contains special provisions for managing wilderness. For instance, ANILCA allows for subsistence use of resources (the legislation intended to cause the least adverse impact to rural residents who depend on subsistence use while at the same time conserving healthy populations of fish and wildlife), access for traditional activities, access to inholdings, and mineral assessments. When selecting commercial visitor service providers, ANILCA specifies a preference for Native corporations and local residents.

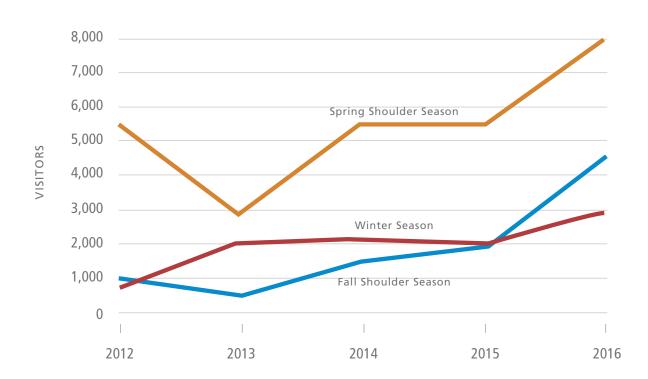
Ultimately, the mandate of both the Wilderness Act and ANILCA is to preserve wilderness character. Visitor use, both commercial and noncommercial, should not degrade resource values and should preserve opportunities for solitude and primitive and unconfined recreation. Commercial activities in wilderness should be free from unnecessary attributes and should have no more impact than an equivalent noncommercial activity.

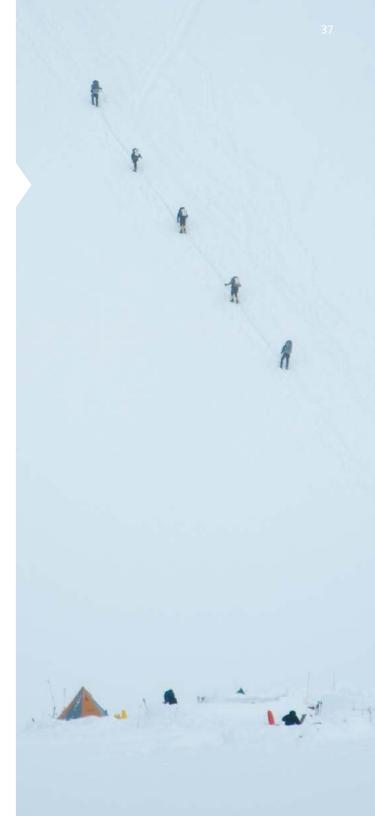


Winter and Shoulder Seasons

One of the noticeable changes at the park is the growing interest in winter and shoulder-season visitation. Throughout this chapter, the fall shoulder season will refer to October and November, the winter season will refer to December through February, and the spring shoulder season will refer to March and April (see fig. 16).

FIGURE 16. PARK VISITATION DURING WINTER AND SHOULDER SEASONS, 2012–16





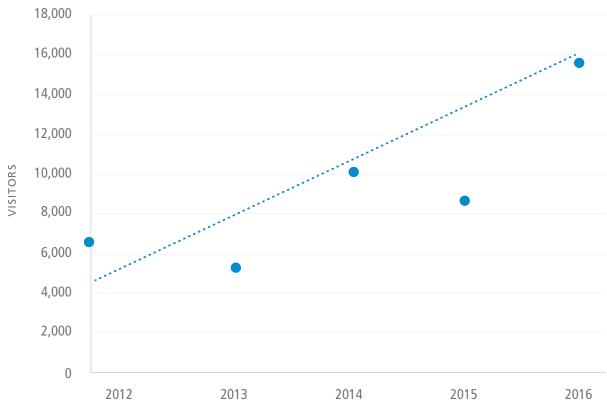
7.1 DRIVERS OF WINTER AND SHOULDER-SEASON VISITATION

Even though temperatures can reach negative 54 degrees Fahrenheit in the winter, visitors find braving the conditions rewarding. Travelers seeking the solitude and beauty of the winter months have steadily increased from 2012 to 2016 (see fig. 17). Travel may be difficult in the winter, but visitors do not have to go far to experience a lot of what the park has to offer. One of the winter tour bus operators noted, "People want to experience the cold, silent wonderland of the forest. They get a feel for the pristine wilderness, even close to the park entrance."

Environmental changes, recent publicity from a growing lineup of reality television programs, and reduced airfare prices all impact winter and shoulder-season visitation to the park. In addition, park management recently concluded a five-year pilot program to open its road to mile 12 at Mount Vista in the spring shoulder season, from 2013 until 2017.



FIGURE 17. WINTER AND SHOULDER-SEASON VISITATION, 2012-16

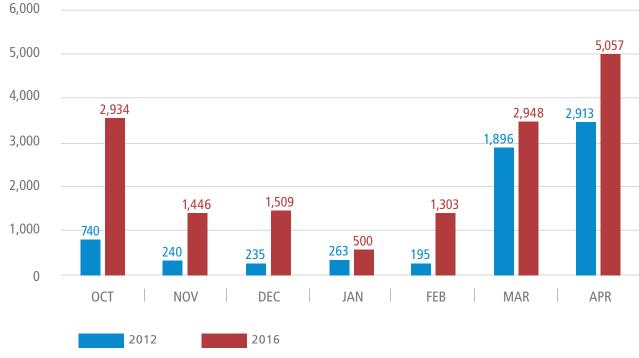


MOUNT FORAKER

Visitation during the winter and shoulder-season months increased immensely from 2012 to 2016 (see fig. 18), with a total season (winter and shoulder) increase of 142 percent over that time frame. Even while park access expanded during March and April with the road opening to Mount Vista, a high percentage of visitation growth occurs during some of the cold winter months. This steep growth in visitation indicates a growing interest in exploring the park during the winter and shoulder seasons. One reason for the noticeable percentage jump in the month of December might be attributed to the holiday season and winter break for students in the continental United States.

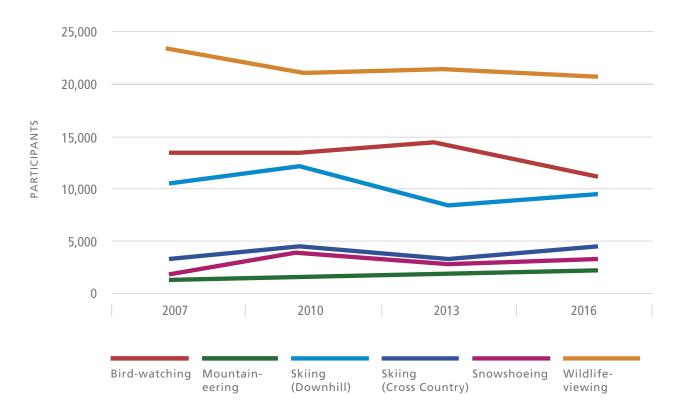


FIGURE 18. DENALI WINTER AND SHOULDER-SEASON VISITATION BY MONTH, 2012 AND 2016



Outdoor industry trends for winter recreation activities across the nation have remained relatively constant over the last decade, with little sign of growth (see fig. 19). ²⁹ As air temperatures rise and the winter season shortens, the season for winter recreation will shorten, as well. ³⁰ To put the changes in perspective, the April snowpack in the Western United States has decreased by 23 percent since 1955. However, since the primary winter interests in the park and interior Alaska center around seeing Denali and the aurora borealis, there is still a large opportunity to capture the interest of winter and shoulder-season visitors. ³¹

FIGURE 19. WINTER ACTIVITY TRENDS IN THE UNITED STATES, 2007–1632



²⁹ OUTDOOR FOUNDATION, OUTDOOR PARTICIPATION REPORT 2017 (WASHINGTON, DC: OUTDOOR FOUNDATION, 2017).

³⁰ NICK BRADFORD, "THE FUTURE OF WINTER SPORTS AND RECREATION," NEEF, FEBRUARY 6, 2018, HTTPS://WWW.NEEFUSA.ORG/NATURE/LAND/FUTURE-WINTER-SPORTS-AND-RECREATION.

³¹ ROSE KELLER, 2017 WINTER VISITOR EXPERIENCE SURVEY: DE-NALI NATIONAL PARK AND PRESERVE, NATIONAL PARK SERVICE UNPUBLISHED REPORT (DENALI PARK, ALASKA: 2017).

³² OUTDOOR FOUNDATION, OUTDOOR RECREATION PARTICIPATION TOPLINE REPORT 2017 (WASHINGTON, DC: OUTDOOR FOUNDATION, 2017).

According to Alaskan winter tour operators and park staff, primary interior Alaska attractions for winter and shoulder-season visitors include:

- » **Northern Lights:** The northern lights (aurora borealis) are a natural phenomenon of cosmic radiation from the sun. Displays may take many forms, including rippling curtains, pulsating globs, traveling pulses, or steady glows. Altitude affects the colors, causing blue violet/reds to occur below 60 miles, bright green between 60 and 150 miles, and ruby reds above 150 miles.³³ Anecdotally, tour companies report that many guests who view the northern lights appreciate having a lodge or shelter where they can warm up and have a hot drink.
- » Arctic Circle: The Arctic Circle marks the latitude above which the sun does not set on the summer solstice and does not rise on the winter solstice.³⁴ Many tourists want to enter the Arctic Circle as a "bucket-list" accomplishment, and they list this as one of the primary reasons for their visits to Alaska. The Arctic Circle is a 325-mile drive north from the park.
- » Chena Hot Springs: Chena Hot Springs is a resort located about 60 miles north of Fairbanks that offers a wide variety of winter activities. Most visitors come to enjoy the hot springs and see the northern lights, but the resort also offers dogsled rides, a dog kennel tour, snow-machine rides, snowshoe/ski/ice-skate rentals, and snowcat rides. The resort includes 80 hotel rooms and seven individual cabins for rental.
- » Denali National Park and Preserve: In 2016, the park attracted nearly 15,700 visitors in the winter and shoulder seasons. During the winter, most people come to visit the dog kennel and explore the park trails by foot, snowshoes, or skis. The Murie Science and Learning Center (MSLC) operates as the visitor center and provides free snowshoe rentals for use on the trails.

THE AURORA BOREALIS AT THE PARK.

³⁴ NATIONAL SNOW AND ICE DATA CENTER, "ALL ABOUT ARCTIC CLIMATOLOGY AND METEOROLOGY: WHAT IS THE ARCTIC?" ACCESSED JUNE 14, 2018, HTTPS://NSIDC.ORG/CRYOSPHERE/ARCTIC-METEO-ROLOGY/ARCTIC.HTML.



³³ LIBRARY OF CONGRESS, "EVERYDAY MYSTERIES: WHAT ARE THE NORTHERN LIGHTS?" LAST MODIFIED JULY 31, 2017, HTTPS://WWW.LOC.GOV/RR/SCITECH/MYSTERIES/NORTHERNLIGHTS.HTML.



7.2 CONSTRAINTS ON WINTER AND SHOULDER-SEASON VISITATION

Growth in winter and shoulder-season visitation presents an opportunity for the park to provide a unique visitor experience with reduced resource impact in comparison to the summer months.

Winter and Shoulder-Season Activities

- » Walk or snowshoe on the trails
- » Watch the visitor movie and view exhibits in the MSLC
- » Visit the dog kennels

Since there are no buildings or lodges to warm up near viewing areas, northern lights viewing is not currently a common activity in the park.

INTERNAL LIMITS TO GROWTH DURING THE WINTER AND SHOULDER SEASONS

Transportation

- » **Railroad:** The Alaska Railroad is a popular option for travel in the state. While the train has limited availability in the winter season, it has recently increased its service to include select midweek service along with its traditional once a week northbound route from Anchorage to Fairbanks on Saturdays and a return trip south on Sundays.
- » Private Vehicle: A private vehicle offers visitors flexibility, but it also brings uncertainty. Road conditions could deter some travelers from driving their own vehicles during the winter season. The road from Anchorage to Fairbanks is maintained, but tourists may fear the weather and vehicle requirements. Car rental companies are readily available in both Anchorage and Fairbanks.

» Chartered Bus: A chartered bus is another popular option for travel to the park. The risk and uncertainty of weather and road conditions are managed by the chartering company. Travelers unfamiliar with the area, terrain, and unpredictable weather often find traveling via chartered bus an appealing option.

Facilities

The park closes the 92.5-mile road at mile 3 after the first significant snowfall of the season. Prior to the road closure, the last bus stops running in mid-September. These closures leave visitors who lack strong winter knowledge limited opportunities to explore the park until park staff open the road to mile 12 (Mountain Vista) in mid-February. For skilled winter enthusiasts, the entire backcountry is open; however, for the average visitor, only the following facilities are open and accessible during the winter:

- » Three miles of road (12 miles by March)
- » One visitor center (MSLC)
- » Eight unmaintained hiking trails (all near the MSLC)
- » Seven bathrooms (two at MSLC, three at Murie Dining Hall, and two at park headquarters)
- » 11 administrative buildings
- » Two water fountains (MSLC and Murie Dining Hall)



Staffing

The park significantly reduces its workforce during the winter. During the summer, there are 310 people working at the park, compared to only 140 in the winter months (113 permanent and 27 term). More specifically, the maintenance division drops from 112 personnel in summer to 40 in winter. This leaves the maintenance team at or beyond capacity for many of the primary tasks required for winter and shoulder-season visitation. Table 4 shows the park's current assessment of the team's ability to meet these requirements.



TABLE 4: MAINTENANCE STAFF'S ABILITY TO MEET PARK VISITOR REQUIREMENTS IN WINTER/SHOULDER SEASONS

Visitor Requirement	Accommodation		
Water Access	The MSLC is the only place to fill up water.		
Shoveled Sidewalks	The current staff meets the requirement but has no ability for growth or expansion.		
Trail Maintenance/Grooming	There is no trail team on staff. Activities like snowshoeing do not require a maintained trail, but cross-country skiing and walking do. With added foot traffic on the sidewalks, increased icing is a possibility.		
Warm Shelter	The MSLC has a program capacity of 59 people. Given current visitation rates and the fact that most visitors come at the same time, the park is nearing capacity.		
Bathrooms	The current septic has a capacity for 225 people/day.		
Road Plowing	The park completes this work using NPS staff and equipment.		
Parking	While current capacity is 85 spots, the staff can adjust to plow additional areas.		
General Maintenance	Peak season needs require many employees to furlough during the winter and shoulder seasons, which can leave little to no coverage for specific skills.		
Within Capacity	Approaching Capacity		



EXTERNAL LIMITS TO GROWTH DURING THE WINTER AND SHOULDER SEASONS





WINTER LODGING

» Total lodging businesses open: 5

» Total rooms available: 105

Business	Capacity	Proximity to the Park
Totem Inn	42 rooms	11 miles north
Aurora Denali Lodge	26 rooms	13.9 miles north
Lakeview Inn B&B	21 rooms	11.3 miles north
Denali Dome Home	7 rooms	12.3 miles north
Denali Touch of Wilderness	9 rooms	16 miles north

*Airbnb was deemed negligible due to only one listing from October to March in 2017.

RESTAURANTS

» Total restaurant businesses open: 3

» Total seating capacity: Breakfast: 40; Lunch: 190; Dinner: 150 (250 January–April)

Business Name	Capacity	Meals	Season
Totem Inn Restaurant	150 people	Lunch and	Open all winter
and Cafe		dinner	(year-round)
Rose's Cafe	40 people	Breakfast	Open all winter
		and lunch	(year-round)
229 Parks Restaurant	100 people	Dinner	Open January–
and Tavern			May (and June-
			October)

WILD BLUEBERRIES GROWING IN THE PARK.

45

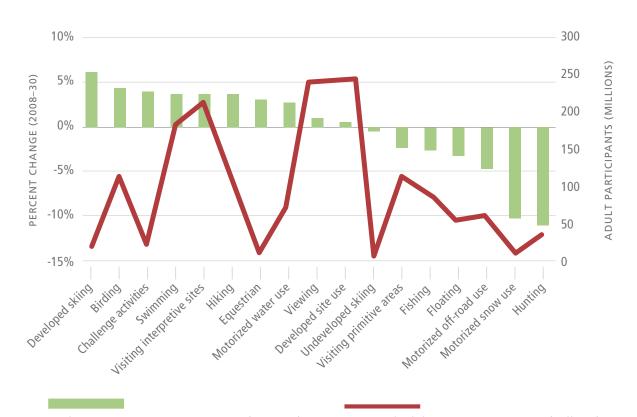
Trends and Opportunities in Recreational Activities

What people choose to do for outdoor recreation changes over time, and management of public lands takes place within this evolving context. This chapter outlines trends in outdoor recreation nationwide, within the NPS, and at Denali specifically. Activities experiencing growth in participation and appropriate to the significance and values of the park may be considered for new commercial opportunities.

8.1 OUTDOOR RECREATIONAL TRENDS

A study by the US Forest Service as part of its 2010 Renewable Resources Planning Act Assessment found that outdoor recreation grew between 2000 and 2009: the participation rate increased by about 7 percent, and the number of days spent on outdoor activities increased by 40 percent.³⁵ Alongside this overall growth, the study identified a shift in the range of popular outdoor activities. Fishing and hunting, while still popular, were declining in participation. In their place, nature-based activities like wildlife- and bird-watching and photography were on the rise. The study also showed that public lands continued to be important for recreational opportunities: in the West, more than 60 percent of viewing and photographing nature took place on public lands, and across the country, three-fourths of backcountry activity occured on public lands.

FIGURE 20. PROJECTED PARTICIPATION IN OUTDOOR RECREATION ACTIVITIES BY 2030



³⁵ H. KEN CORDELL, OUTDOOR RECREATION TRENDS AND FUTURES: A TECHNICAL DOCUMENT SUPPORTING THE FOREST SERVICE 2010 RPA ASSESSMENT (ASHEVILLE, NORTH CAROLINA: US DEPARTMENT OF AGRICULTURE, FOREST SERVICE, 2012).



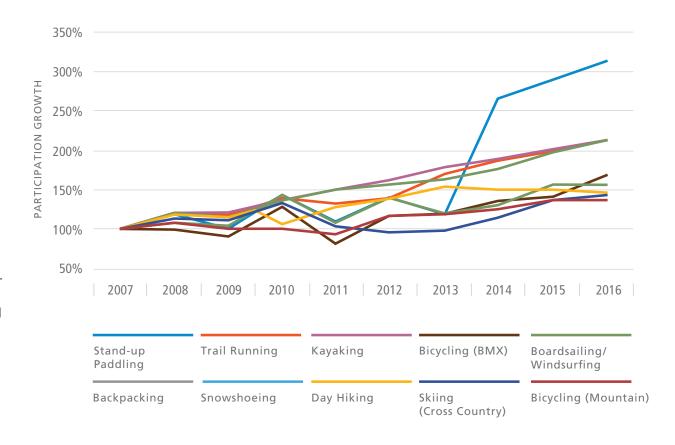
Among the report's highlights are a few notable trends:

- » About 81 percent of all adults participated in nature-viewing in some form in 2008, and projections expect participation rates for both nature-viewing and birding to increase.
- » Hiking, the most popular backcountry activity—one-third of all adults participated in 2008—will likely increase by 3 percent, involving more than 100 million participants by 2030.
- » Visiting primitive areas (e.g., backpacking, primitive camping, visiting wilderness areas) is expected to decline in participation by 2 percent by 2030.

In 2017, the Outdoor Foundation released its Outdoor Recreation Participation Report, based on online interviews with over 24,000 individuals and households. ³⁶ The survey found running, biking, fishing, camping, and hiking to be the most popular outdoor activities for both youths and adults. Between 2007 and 2016, stand-up paddling, trail running, and kayaking surged in popularity: participation (ages 6+) in stand-up paddling tripled in this 10-year period. Other growing activities include bicycling (BMX and mountain), boardsailing and windsurfing, backpacking, snowshoeing, day hiking, and cross-country skiing.

Residents in Alaska have a higher rate and intensity of participation in outdoor recreation compared to the national average.³⁷ Survey data

FIGURE 21. TEN OUTDOOR ACTIVITIES WITH GREATEST GROWTH SINCE 2007



indicate that the activities with highest annual participation per capita in the state are bird- and wildlife-viewing, scenic driving, off-road driving, biking, and fishing.³⁸

³⁶ OUTDOOR RECREATION PARTICIPATION TOPLINE REPORT 2017.

³⁷ J. M. BOWKER, OUTDOOR RECREATION BY ALASKANS: PROJECTIONS FOR 2000 THROUGH 2020, GEN. TECH. REP. PNW-GTR-527 (PORTLAND, OREGON: US DEPARTMENT OF AGRICULTURE, FOREST SERVICE, PACIFIC NORTHWEST RESEARCH STATION, 2001), 19.

³⁸ BOWKER, OUTDOOR RECREATION BY ALASKANS, 19.



8.2 RECREATIONAL TRENDS ACROSS THE NPS

Data on businesses operating under CUAs in national parks from 2012 to 2016 show which commercial recreational activities are on the rise across the NPS. Recreational CUAs that saw the greatest increase in the number of customers include boat rental, frontcountry hiking, and step-on interpretive guide service (see table 5).

The 59 designated national parks in the NPS system span a variety of ecosystems and lend themselves to diverse recreational opportunities. Denali is a remote, mountainous park with a summer peak season; its wildlife is a main attraction. Comparable parks include: Glacier, Grand Teton, Katmai, Lake Clark, Mount Rainier, Olympic, Rocky Mountain, Wrangell-St. Elias, Yellowstone, and Yosemite.³⁹

TABLE 5. CUSTOMER GROWTH BY CUA ACROSS NATIONAL PARK SERVICE, 2012–16

	Activity	Total Growth	
1	Food and Beverage	1,109,244	
2	Retail Sales	103,634	
3	Boat Rental	100,049	
4	Hiking (Frontcountry)	95,025	
5	Step-on Interpretive Guide Services	64,891	
6	Horseback/Mule Rides	18,100	
7	Environmental Education	15,337	
8	Watersport Instruction	10,904	
9	Motorcycle/Scooter/Segway Tours	8,495	
10	Bicycle Tours	8,164	
11	Fitness	7,700	
12	Vessel Support Services	7,161	
13	Bicycle Rentals	3,524	
14	SCUBA/Snorkeling	3,069	
15	Outdoor Skills	3,068	

³⁹ COMPARABLE PARKS ARE DEFINED, IN THIS INSTANCE, AS THOSE SHARING TWO OR MORE ATTRIBUTES WITH DENALI: A REMOTE, MOUNTAINOUS PARK IN THE WESTERN UNITED STATES WITH OPPORTUNITIES FOR WILDLIFE VIEWING AND PEAK VISITATION IN SUMMER.



The recreational activities that have grown in popularity in this subset of comparable parks include frontcountry hiking, boat tours, bicycle tours, climbing/mountaineering, and environmental education (see table 6).

Since Denali draws visitors from across the country and around the world, recreational trends elsewhere in the country are relevant to park management. Popular recreational activities from comparable parks may translate especially well to Denali given similarities in park characteristics.

TABLE 6. CUSTOMER GROWTH BY CUA IN PARKS COMPARABLE TO DENALI, 2012–16

	Activity	Total Growth	
1	Hiking (Frontcountry)	20,563	
2	Boat Tours	14,326	
3	Retail Sales	10,311	
4	Bicycle Tours	6,770	
5	Climbing/Mountaineering	4,641	
6	Environmental Education	2,100	
7	Photography Instruction	1,577	
8	Transport (Nontour)	1,360	
9	Motorcycle/Scooter/Segway Tour	605	
10	Hunting Guide Services	29	





8.3 RECREATIONAL TRENDS IN DENALI

Backpacking

Between 2012 and 2016, the number of visitors who backpacked into the Denali wilderness increased from 5,739 to 6,770, representing an increase of almost 18 percent. At the same time, the average stay per visitor dropped from 1.45 nights in 2012 to 1.32 nights in 2016 (see fig. 22). Interest in backpacking may be on the rise, but visitors seem to be shortening their trips into the backcountry.

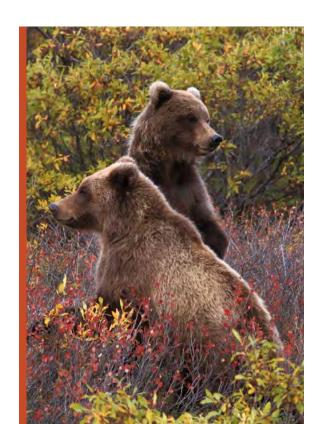
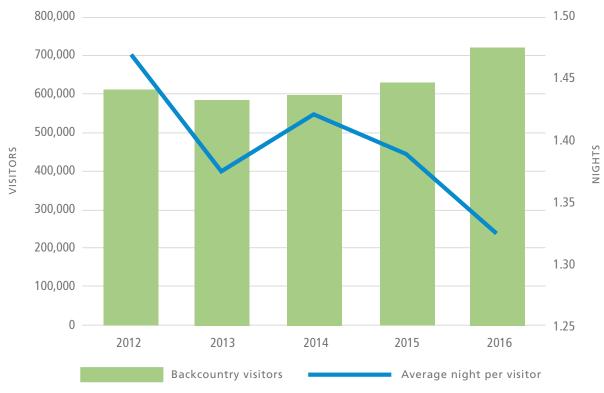


FIGURE 22. VISITOR BACKCOUNTRY USE, 2012-16



Bus Ridership

In terms of bus ridership, tour buses tend to have greater occupancy than transit buses. In 2016, Tundra Wilderness Tours had an average of 46 passengers per bus, which translates to 88 percent occupancy (average bus capacity is 52 seats). That same year, transit buses averaged 28 passengers per bus (average transit bus capacity is 36 seats), which amounts to 78 percent occupancy. The difference in occupancy largely can be attributed to the typically smaller size of transit buses, their reduced number of seats in order to accommodate camping gear, and the fact that each transit bus reserves four seats to allow room for picking up hikers and backpackers on their way back to the park's bus depot.

Buses, especially transit shuttles, are important features in the park because they allow hikers and backpackers, as well as potential new commercial services, access to the backcountry. Without the park road, visitors wishing to spend time in the park's interior would have to trek in by foot, travel by bike (which would need to be carried for the first 150 feet if it left the road), or hire air taxis or dogsleds.

FIGURE 23. CAPACITY UTILIZATION OF BUSES, 2016

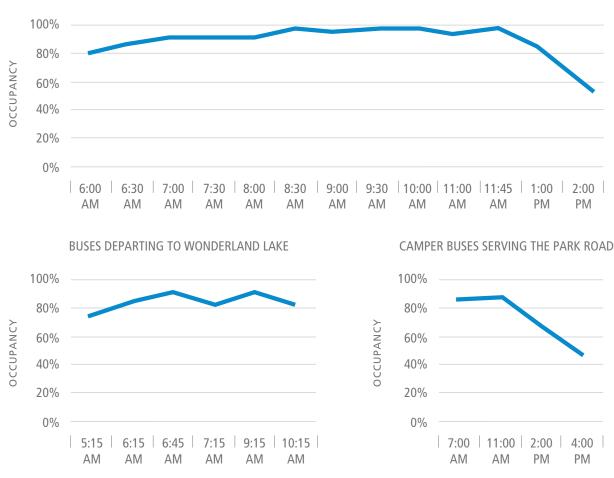


Bus utilization is not consistent throughout the day, however. Ridership data from 2016 show that transit buses departing for Eielson Visitor Center between 7:30 and 10 a.m. have occupancy rates of 90 percent or higher in July. Utilization of buses to both Wonder Lake and Eielson drops as the day progresses, with the exception of a midday spike for Eielson. Camper buses tend to be emptier in the afternoon compared to morning (see fig. 24).



FIGURE 24. TRANSIT UTILIZATION THROUGHOUT THE DAY, JULY 2016

BUSES DEPARTING TO EIELSON VISITOR CENTER



LOOKING WEST AT THE BEND ON THE MULDROW GLACIER.

Camping

Camping has seen a steady increase from 2012 to 2016: the number of nights visitors spent camping in 2016 was 6 percent higher than in 2012. The trends for RV and tent use have followed opposite tracks, however. The number of nights spent in tents tripled between 2012 and 2016, while nights spent in RVs saw a 58 percent decrease.

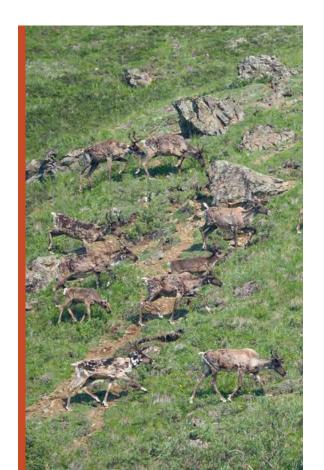


FIGURE 25. CAMPGROUND USE, 2012-16



Savage, Teklanika, and Wonder Lake campgrounds are highly popular: utilization can exceed 90 percent in the peak months of July and August. In contrast, Igloo and Sanctuary campgrounds see much lower levels of use, in part because they do not accept reservations in advance.

Discovery Hike

Sign-ups for ranger-led Discovery Hikes have increased over time: in 2007, 857 park visitors signed up for a Discovery Hike; by 2016, this number had grown to 1,398—a 63 percent increase. Meanwhile, overall visitation to Denali increased by only 28 percent. Notably, the park offered 93 Discovery Hikes in 2007 and 173 in 2016, suggesting that the availability of Discovery Hikes may lead visitors to sign up for them.

Discovery Hike sign-ups relative to overall visitation to the park peaked in 2012, at 3.8 sign-ups for every thousand visitors; sign-ups decreased over the last three years to 2.4 per thousand visitors. Nonetheless, the Discovery Hike remains a popular offering: on average, visitors fill eight of 11 spots for each hike throughout the season.

TABLE 7. CAMPGROUND OCCUPANCY, 2016

	May	June	July	August	September
Igloo Creek	13%	33%	47%	52%	27%
Riley Creek	33%	75%	84%	79%	64%
Sanctuary River	1%	7%	4%	19%	7%
Savage River	55%	91%	94%	98%	94%
Teklanika River	41%	84%	93%	92%	91%
Wonder Lake		68%	92%	84%	94%

FIGURE 26. DISCOVERY HIKE SIGN-UPS, 2007-16





8.4 POTENTIAL NEW COMMERCIAL SERVICES

The list in table 8 outlines potential new commercial services at Denali and where in the park they might be offered. The list is based on recreational trends nationwide and at the park, as well as interviews with park staff, businesses, and community members.

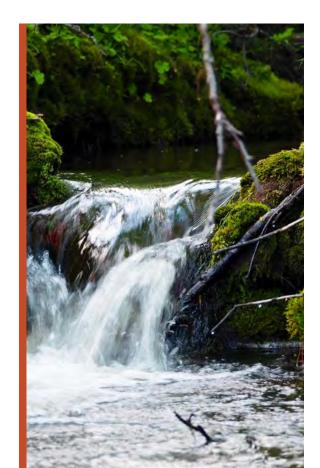


TABLE 8. HIGH-POTENTIAL COMMERCIAL ACTIVITIES AT DENALI NATIONAL PARK AND PRESERVE

Potential Commercial Activities	Location(s)
Bike rental, off-peak season (including fat-tire bikes)	Denali Bus Depot (formally the Wilderness Access Center), Mountain Vista
Bike tours, off-peak season	Along the park road or established trails, off-road possible with fat-tire bikes if sufficient snow coverage
Day hiking, guided	Backcountry accessed from park road
Dogsledding, short trips	Murie Science and Learning Center (MSLC) to park headquarters
Environmental education	Frontcountry, backcountry accessed from park road
Gear rental, camping	Gear pickup at WAC or campgrounds
Guided winter activities and gear rental	MSLC, Mountain Vista
Human-powered watercraft (canoeing, paddleboarding)	Wonder Lake
Overnight hiking, guided (including pack-rafting)	Backcountry units 2 and 16 (accessed from Cantwell); backcountry units 21, 37, 38, 40, 41, 43 (accessed from park road)
Photography instruction	Eielson Visitor Center, Wonder Lake

A CREEK NEAR THE THOROFARE CABIN.

Acknowledgments

Thanks are due to the following people for their generous help and support in the creation of this commercial service strategy. It would not have been possible without their efforts.

DENALI NATIONAL PARK AND PRESERVE STAFF

- » Don Striker, Superintendent
- » Dawn Adams
- » Taylor Bracher
- » John Brueck
- » Emily Buhr
- » Shawn Burton
- » William Clark
- » Nancy Holman
- » Erika Jostad
- » Rose Keller
- » Landon Labahn
- » Jim LeBel
- » Lynn McAloon
- » Molly McKinley
- » Ray Moore
- » Kathleen Przybylski
- » Dave Schirokauer
- » Denice Swanke
- » Jessica Toubman
- » Miriam Valentine

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- » Michael Meehan University of Washington, Michael G. Foster School of Business
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BUSINESS MANAGEMENT GROUP

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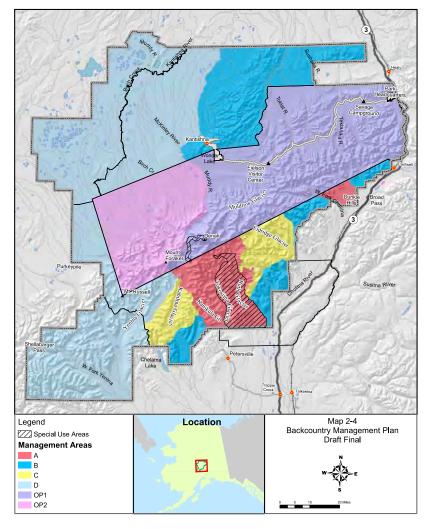


1 O Appendices

APPENDIX A. ACRONYM INDEX

ANILCA	Alaska National Interest Lands Conservation Act	
CUA	Commercial Use Authorization	
DVC	Denali Visitor Center	
MSLC	Murie Science and Learning Center	
NPS	National Park Service	

APPENDIX B. MANAGEMENT AREAS, PER 2006 BACKCOUNTRY MANAGEMENT PLAN



APPENDIX C. MANAGEMENT AREA DESCRIPTIONS⁴⁰

Management Area	Purpose	Resource Condition	Social Condition
Α	Provide a variety of opportunities for wilder-	» Trail and campsite disturbance: Medium	» Encounters with people: High
	ness recreational activities that are relatively accessible to day-users and to those who	» Evidence of modern human use: Medium	» Encounters with large groups: Yes
	have limited wilderness travel skills or	» Landscape modifications: No	» Camping density: Low
	equipment	» Litter and human waste: Low	» Accessibility: Medium
		» Natural sound disturbance: High	» Administrative presence: Medium
3	Provide opportunities for wilderness rec-	» Trail and campsite disturbance: Low	» Encounters with people: Medium
	reational activities suitable for day-users and overnight users that are remote and require	» Evidence of modern human use: Low	» Encounters with large groups: Yes
	self-reliance	» Landscape modifications: No	» Camping density: Low
		» Litter and human waste: Low	» Accessibility: Low–Medium
		» Natural sound disturbance: Medium	» Administrative presence: Low
C	Provide opportunities for climbing and mountaineering experiences in a wilderness setting	» Trail and campsite disturbance: Medium	» Encounters with people: High
		» Evidence of modern human use: Medium	» Encounters with large groups: Yes
		» Landscape modifications: No	» Camping density: Low
		» Litter and human waste: Low	» Accessibility: Low–Very Low
		» Natural sound disturbance: Medium	» Administrative presence: Low
)	Provide opportunities for extended expeditions that are remote and require self-reliance, significant time commitment, and thorough advance planning	» Trail and campsite disturbance: Low	» Encounters with people: Low
		» Evidence of modern human use: Low	» Encounters with large groups: No
		» Landscape modifications: No	» Camping density: Low
		» Litter and human waste: Low	» Accessibility: Low
		» Natural sound disturbance: Low	» Administrative presence: Low

⁴⁰ 2006 BACKCOUNTRY MANAGEMENT PLAN.

Management Area	Purpose	Resource Condition	Social Condition
Portal	Provide year-round or seasonal high-use airplane landing areas that allow access to remote parts of the park and preserve	» Trail and campsite disturbance: N/A	» Encounters with people: N/A
		» Evidence of modern human use: Medium	» Encounters with large groups: Yes
		» Landscape modifications: No	» Camping density: Medium
	*Natural sound disturbance standard is	» Litter and human waste: Low	» Accessibility: Medium
	same as for surrounding area, but no lower than medium	» Natural sound disturbance: Medium–High*	» Administrative presence: Medium
Portal – Major	Provide seasonal (May–September) high-use	» Trail and campsite disturbance: N/A	» Encounters with People: N/A
Landing Area	airplane landing areas that are suitable for both day use and expedition drop-off and	» Evidence of modern human use: High	» Encounters with large groups: Yes
	pickup	» Landscape modifications: Yes	» Camping density: High
		» Litter and human waste: Low	» Accessibility: High
		» Natural sound disturbance: Very High	» Administrative presence: Medium–High
Corridor	Provide (year-round or seasonal) high-use	» Trail and campsite disturbance: Medium	» Encounters with people: Very High
	travel routes via ground or water that pro- vide access to remote parts of the park	» Evidence of modern human use: High	» Encounters with large groups: Yes
		» Landscape modifications: Yes	» Camping density: Medium
		» Litter and human waste: Low	» Accessibility: Low–High
		» Natural sound disturbance: High	» Administrative presence: Medium
Backcountry Hiker	Provide day-use trails into the backcountry	» Trail and campsite disturbance: N/A	» Encounters with people: Very High
	in areas that are accessible to many visitors (year-round or seasonal)	» Evidence of modern human use: High	» Encounters with large groups: Yes
		» Landscape modifications: Yes	» Camping density: N/A*
	*No camping would be allowed on	» Litter and human waste: Low	» Accessibility: High
	the trails	» Natural sound disturbance: Medium	» Administrative presence: High

Management Area	Purpose	Resource Condition	Social Condition
Ruth Glacier Special	Provide for high use of transportation	» Trail and campsite disturbance: Medium	» Encounters with people: High
Use	services during the season (May–September) when large numbers of day users are	» Evidence of modern human use: Medium	» Encounters with large groups: Yes
	accessing the Ruth Amphitheater	» Landscape modifications: No	» Camping density: Low
		» Litter and human waste: Low	» Accessibility: Low–Very Low
		» Natural sound disturbance: Very High	» Administrative presence: Medium
Old Park:	Provide opportunities for day use and	» Trail and campsite disturbance: Medium	» Encounters with people: Medium
OP 1	overnight wilderness recreational activities that are remote and require self-reliance in	» Evidence of modern human use: Low	» Encounters with large groups: Yes
	an area that has limited opportunities for	» Landscape modifications: No	» Camping density: Low
	motorized access	» Litter and human waste: Low	» Accessibility: Medium–High
		» Natural sound disturbance: Low	» Administrative presence: Medium
Old Park:	Provide opportunities for extended expeditions that are remote and require a high degree of self-reliance, significant time commitment, and thorough advance planning in an area that has limited opportunities for motorized access	» Trail and campsite disturbance: Low	» Encounters with people: Low
OP 2		» Evidence of modern human use: Low	» Encounters with large groups: No
		» Landscape modifications: No	» Camping density: Low
		» Litter and human waste: Low	» Accessibility: Low
		» Natural sound disturbance: Low	» Administrative presence: Low
Old Park:	Provide a seasonal (late April–mid-July)	» Trail and campsite disturbance: N/A	» Encounters with people: N/A
West Buttress Special Use	route to the summit of Denali that can accommodate large numbers of climbers	» Evidence of modern human use: High	» Encounters with large groups: Yes
	during the primary climbing season	» Landscape modifications: Yes	» Camping density: High
		» Litter and human waste: Low	» Accessibility: Low–Very Low
		» Natural sound disturbance: Low	» Administrative presence: High



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