

# STATE OF ALASKA

**SEAN PARNELL, Governor**

**ANILCA IMPLEMENTATION PROGRAM  
Office of Project Management and Permitting**

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October 13, 2011

Paul Anderson, Superintendent  
Denali National Park and Preserve  
P.O. Box 9  
Denali Park, AK 99755

Dear Mr. Anderson,

The State of Alaska reviewed the September 2011 Draft Climbing Allocation for Mount McKinley and accompanying Environmental Assessment. The following comments represent the consolidated views of the State's resource agencies.

The State generally supports the Service's intent to implement reasonable allocations for guided and independent climbing use, including flexibility for dealing with unused allocations. A successful allocation system will provide commercial operators with some room for growth, while ensuring the continuation of ample non-guided use opportunities into the future. Unfortunately, some aspects of the action alternatives proposed in the EA may impede these objectives. Most notably, any process that defaults unallocated use from non-guided to guided use is inherently problematic, since commercial guides cannot as easily take advantage of short term opportunities compared to many non-guided users. Most guides work with clients who arrange their trip 6-12 months in advance; while independent climbers with previous Denali experience can plan a trip with as little as a week's notice to the Park under the current registration rules.

In addition, while both action alternatives would offer increased opportunity for commercial operators and their guided clients – as long as unused allocation is available – they would not guarantee such increases in the future. Inviting such a business growth opportunity that would be lost at some unpredictable point in the future does not promote a stable, healthy business model for future planning purposes.

Given the above, we suggest consideration of a new alternative that increases the guaranteed guided allocation to a new target level that is substantially above 25%, but no more than 50%, which defaults any unused guided allocation to unguided use. This approach would give the commercial guides both stability and opportunities for reasonable growth, while ensuring a minimum 50% unguided use opportunity into the future.

Thank you for this opportunity to comment. If you have any questions, please call me at (907) 334-2563.

Sincerely,

A handwritten signature in black ink that reads "Nina Brudie". The signature is written in a cursive, flowing style.

Nina Brudie

ANILCA Project Coordinator

cc: Susan Magee, ANILCA Program Coordinator