

DCC's Initial Reaction to the Denali Park Road Vehicle Management Plan August 21, 2011

On August 1, 2011, the National Park Service released its long-awaited *Draft Denali Park Road Vehicle Management Plan and Environmental Impact Statement*. This plan is the first major proposed change to park road management since the 1997 *Entrance Area and Road Corridor DCP*, and the first time NPS has proposed to end the seasonal vehicle limit of 10,512, a key management principle established in the park's 1986 *General Management Plan*. NPS is accepting comments on the draft *Vehicle Management Plan* through September 30.

DCC will be preparing our comments on the plan over the next month and half, but we wanted to float some initial responses and questions for our membership to contemplate. We know that a lot of you have expertise related to the park road, and we need your information and ideas. Please take some time to respond in the near future – the earlier the better.

What will the plan do?

The plan provides a “no action” alternative and two action alternatives, but does not identify a preferred alternative. Details for each alternative can easily be reviewed by reading Chapter 2 of the plan (*The Alternatives*). The most significant actions proposed are:

- **Rescind the 10,512 seasonal vehicle limit** on the Denali park road that has been a guidepost for management decisions since 1986 and a regulation since 2000. This limit would be replaced by a system of **adaptive management** using indicators and standards that stand in for visitor experience and resource quality. In order to ensure these standards are achieved, the Superintendent would limit traffic each season using results of adaptive management data gathered the previous season, via the compendium process.
- **Provide the Superintendent with more flexibility in allocating between services.** At present, the allocations between tour, transit, and other uses (NPS, Kantishna lodge buses) are specified by the 1997 *Entrance Area and Road Corridor DCP*. The new alternatives do not specify allocations between services, but do indicate transit would be given priority in decision-making.
- **Rearrange the types of bus services offered in the park** by creating an “economy tour” distinct from both the transit service and the “premium tour” opportunities that presently are the Denali Natural History Tour and Tundra Wildlife Tour. New turnaround points for tour buses are considered (e.g. adding a “Teklanika Tour” and long tours that go the Eielson, Wonder Lake, or Kantishna instead of mostly turning at Toklat).

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- **Manage the number of non-system vehicles on the park road more rigorously** by further limitations on NPS vehicles, professional photographers and commercial filmers, and possibly even Teklanika Campground campers. Kantishna business traffic is also addressed.
- **One alternative changes management zoning of the park road between Eielson Visitor Center and Wonder Lake** to ensure it stays more remote and less traveled than the road segment from Savage to Eielson.

NPS distinguishes between the specifics of the two action alternatives by indicating that Alternative B would optimize access – provide for the maximum number of visitors to access the park – while Alternative C would maximize the variety of opportunities for visitors.

What Does DCC Like?

At first read, there are several features in the alternatives that DCC is responding positively to.

- **Setting specific standards for visitor experience is a good idea.** Tracking these variables over time will provide an objective measure of how well (or poorly) the strategy for managing vehicles is serving park visitors.
- **Utilizing adaptive management and a traffic model to optimize trips for visitor experience and resource protection could help to improve the current system.** Refining the 10,512 visitor limit with improved knowledge from the road study is also useful, and to be expected over time. See below, however, regarding our concern that neither of these actions necessarily takes away the need to set an overall vehicle limit for park road traffic.
- **The plan gives priority to the transit service when allocating vehicles.** This is very important for ensuring basic access, something DCC has always strongly advocated. There is also an indicator – the time hikers have to wait for a pickup along the road – that can provide guidance as to whether transit is meeting a minimum level of service.
- **The consideration of new kinds of tours and opportunities that could better serve diverse visitor interests is timely.** The plan opens the possibility of specialty tours, adds some reasonable turnaround options, and adds an economy tour that will make sense for a lot of visitors who are seeking something less expensive than a Tundra Wilderness Tour but have no intention of getting off their VTS bus. Even if NPS is really just adding a label and more self-guided interpretive materials to an existing feature of the VTS (which is all Alternative B seems to do), the shift in marketing focus would greatly help with visitor clarity regarding their choices. However, we are concerned that the “economy tour” label shouldn’t just be used to raise the price of the service.
- **Putting commercial filmers and professional photographers under the same permit system** is a sensible and fair adjustment to current policy.

- **Creating a new management zone that acknowledges and preserves the lower use levels on the Eielson-Wonder Lake section of road seems sensible.**

What are DCC's questions and concerns?

- **Can this adaptive management scheme protect park resources, as expressed in this plan?**
 - **Do the indicators so far chosen in this plan adequately cover the broad range of resource values in the park?** How will the park ensure that, over time, the indicators in this plan will remain adequate to protect wilderness integrity and visitor experience? The visitor experience indicators seem fairly easy to quantify, but what about other resource metrics for which a simple number is not available?
 - **Are the specific standards appropriately selected?** We are particularly concerned about the fudge factors – how often measured conditions can deviate from standards. We would like to see the measured conditions of the current system compared to the standards. We also are curious what would be the maximum amount of traffic that could be allowed under the indicators and standards as described. The sample schedules used in Appendix D show a 9-10% increase in traffic over 10,512 that still meets standards, but how much more would the standards allow?
 - **Will NPS have the capacity to manage the program?** The indicators and standards framework sounds logical and is reflective of the direction NPS as a whole is moving to determine national park carrying capacity. However, this is the same type of framework as utilized in the Denali *Backcountry Management Plan*, and 5 years into implementation NPS has still not monitored all the indicators required by the plan. Implementation of the *Vehicle Management Plan* will require \$1million or more additional each year – how likely is it that NPS will get these funds? What is the fallback management scheme if it proves impossible to conduct the essential monitoring?
 - **Adaptive management as presented is too flexible, and doesn't protect the park from political pressures** that have nothing to do with resource protection. While we are sympathetic to refining the vehicle limit with new information, discarding a firm limit altogether seems rash and leaves the determination of capacity open to manipulation veiled by the complexity (if not abuse or neglect) of the adaptive management system. While NPS dismissed from consideration an alternative that would deploy adaptive management but retain current vehicle limits, it failed to take the logical step of considering an alternative with adaptive management and a new vehicle limit rooted in the improved information gathered through the park road study.

- **There are no thresholds of resource degradation in the plan that would trigger traffic reductions.** The adaptive management strategy in Appendix C provides for monitoring to identify any detrimental impacts to wildlife of traffic increases, however there is no indication of how large an impact would have to be in order to generate action. The determination is left to “agency and academic scientists” of the Denali Vehicle Advisory Board with no apparent public oversight or involvement. Essentially, this change removes the agency accountability required by vehicle limits in the park’s current general management plan and replaces it with “trust us.” We prefer the accountability.
- **In the current plan, transit system affordability is not defined or guaranteed.** While the document makes a lot of noise about the importance of affordability, it does nothing to control the cost of basic access into the park. NPS has an enormous opportunity with this plan to put in place a system that will be affordable and attractive to all, but it picks a vague and incorrect standard – and wrong conclusion – for what should be considered “affordable.” At the very least, NPS should spell out a clear standard for what it considers to be affordable for basic access into the park.
- **Are provisions of the plan sufficient to protect the transit system from being gradually compromised by the more lucrative tours?** The hiker wait-time standard is the main tool for protecting the transit system; is that enough? Are there other parameters for defining a successful transit service?
- **In the current plan, the impacts of new tour products and destinations are not adequately covered.** What, if any, downsides are there to extending short tours to Teklanika, or long tours to Eielson or Wonder Lake?
- **The National Park Service did not consider obvious possible alternatives for Kantishna day use traffic.** In particular, NPS should have considered the possibility of requiring Kantishna day use travelers to use buses operated within the concession system, while prohibiting lodge-operated day tours altogether. Since NPS is proposing that the day tours be given commercial authorizations in both Alternatives B and C, the day tours are obviously not ANILCA 1110(b) access, so what is the rationale for these duplicative tours? DCC does not at present have an opinion on which alternative we would prefer, but we would like to see a full spectrum of options.

DCC is asking for feedback on all of these issues, and any others we may have missed. Please send your thoughts to us via the contact form on our website www.denalicitizens.org, our Facebook page, by e-mail to nancy@denalicitizens.org, or phone at (907) 277-3825.