



## Reaction to Denali Vehicle Management Plan

Denali Citizens Council released an initial reaction to the draft Denali Vehicle Management Plan and EIS in August, shortly after the plan's release. This document better articulates the parts of the Vehicle Management Plan that we support, and/or are concerned about. We plan on refining our comments further, based on input from our members. Please email us at [mail@denalicitizens.org](mailto:mail@denalicitizens.org) if you would like to share your concerns, ask questions, or discuss further! Visit our website to find original and updated documents.

### What we support in the Denali Vehicle Management Plan

- **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.
- **The new management zone, Wildlife Viewing Subzone 3 (now part of Alternative C), that acknowledges and preserves the lower use levels on the Eielson-Wonder Lake section of road, is appropriate.**
- **Utilizing adaptive management, with standards and indicators, is a more scientific approach to management** and is already being used in Denali's Backcountry Plan. We have concerns regarding the details of this plan, but the general attempt to be more rigorous in measuring the impacts of transportation at Denali is laudable.
- **Putting commercial filmers and professional photographers under the same permit system is a sensible** and a fair adjustment to current policy. We have not yet decided which alternative to support regarding how to run this system.
- **Incorporating standards for construction-related vehicles is logical.** Traffic is limited along the park road to protect resources such as wildlife and wilderness resources. Traffic is traffic, no matter the purpose of that traffic, and we applaud NPS for including contractor vehicles in this vehicle management plan.
- **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. At the same time, we hope NPS will not lose sight of their guarantee to prioritize transit and keep it affordable, and to provide for a simple and efficient system that protects resources. We also hope NPS will consider carefully the impacts of these new concepts upon existing infrastructure at the road's edge, despite the plan's assertion that infrastructure is "beyond the scope of the plan."
- **There are some reasonable ideas in this plan that do not require a full EIS, such as** developing a printed or media-related materials for park guests to take on their transit ride to provide more of a "tour" type experience, quieter buses, or adjusting scheduling to reduce impacts at certain key times of day. We hope NPS will consider these good ideas as part of any alternative.



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## Concerns about the Denali Vehicle Management Plan

- **General Concerns about the Action Alternatives**
  - **We wonder if this complex deployment of park resources is actually needed right now.** Many of the changes in tour type and scheduling can be accomplished without a major new EIS, and instead under the auspices of the 1997 Entrance Area and Road Corridor EIS, with some amendments to that plan. The park is, right now, more than 10% below its highest tourism numbers in 2007. There is no threat to 10,512 in the foreseeable future. Adaptive management can be employed as a research strategy to help study the existing condition and develop further recommendations. This conservative approach has many positives.
  - **Do the indicators/standards so far chosen in the proposed Vehicle Management Plan adequately cover and protect the broad range of resource values in the park?**
    - **Indicators are not all equal in this plan. We wonder if specific standards and thresholds are adequately strong.** Some indicators are easily measurable using the GPS-fleet management concept. Some are more vague. Our suggestions for indicators and standards are still developing. So far, we think NPS should improve the “hiker wait time” standard, and we would like to see wildlife standards strengthened.
    - **Some indicators of “resource health” sound important and yet less information is available on how they will be deployed** - including the BACI studies and the scientific panel. The monitoring of these indicators is vague in the plan, and will be conducted less often. With respect to **collaring of park animals** in any of these studies, we request a breakdown of what, why, how and when this will be done, and whether it has priority over collaring for habitat and ecosystem studies. We are concerned that collaring of animals in Wilderness be submitted to close cost/benefit analysis.
    - **Will NPS have the capacity to manage the program?** 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.
    - **Adaptive management as presented is too flexible, and doesn't protect the park from political pressures** that have nothing to do with resource protection. Discarding a firm limit altogether seems rash and leaves the determination of capacity open to manipulation veiled by the complexity of the adaptive management system. NPS should develop an Alternative that uses adaptive management and a new vehicle limit rooted in the improved information already gathered through the park road study.
  - **Cost could be a limiting factor in a plan that will take an additional \$1 million/yr. to operate.** Even if funded by franchise fees, this monitoring plan could displace other important park programs currently funded by franchise fees. When the concessioner pays for this entire program, there is additional potential for conflict of interest and manipulation.
  - **Can this plan protect an affordable, accessible transit system?**
    - **In the current plan, transit system affordability is not defined or guaranteed.** At the very least, NPS should spell out a clear standard for what it considers to be affordable for basic access into the park.
    - **Any action alternative should guarantee a certain minimum percentage of unbooked seats** on transit to accommodate walk-ins and eastbound pickups.



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- **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? How does pre-booking, especially to commercial interests for resale, affect perceived demand?
- **Concerns about Alternative B - “Optimizing Numbers”**
  - **Bus size** - We oppose changing design vehicle size on any part of the Park Road or the introduction of any bus larger than the current design vehicle. Any changes to vehicle size would require amendments to 2007 Road Design Standards, and would likely require additional NEPA review and compliance.
  - **Transit-Economy Tour Bundle** – This system will keep transit costs the lowest, which we support, however we have concerns. We are concerned about the elimination of the Camper Bus, for instance. We oppose paying more for a “premium seat” on transit, and are concerned about paying more to retain a seat throughout the trip. Keep it simple and inexpensive. Whatever additional costs added for the “economy tour” product should be itemized, and NPS should consider other options for a self-guided tour that could be made available instead through NPS or park partners.
  - **Hikers being picked up by tour buses on the return trip** - We do not oppose this concept, but it should not replace adequate deployment of transit buses.
  - **Teklanika River Campground** – We are worried that creating a “tents only” campground at Teklanika would unnecessarily restrict access. We **do not**, however, think that private vehicles staying at Teklanika campground should ever be allowed access westbound on the Park Road.
  - **Kantishna Day Tours** – We do not support the language regarding Kantishna day tours as written in Alt B unless it includes an option to reduce the number of concessions permits for day tours if resource protection dictates it.
- **Concerns about Alternative C “Maximizing Opportunities”**
  - **Economy tour** – We’re concerned about adding a tour product that could raise the price of what should remain a guaranteed, inexpensive transit experience. Efficiency and visitor experience could be well served by bundling the economy tour into transit as in Alternative B. The basic, inexpensive transit seat should not be shrouded in a variety of added charges. Any interpretive products that are added should be itemized. We do not oppose adding these opportunities, but we wonder why a passenger must pay to guarantee their seat, if the park is already guaranteeing no more than a 30-minute wait.
  - **Loop shuttle from Eielson to Wonder Lake** – though offered through this alternative, this option could be available under any Alternative. It has been employed in the past, and the park must consider its impact on already VERY crowded employee housing units at Wonder Lake.
  - **Kantishna Commercial Use Authorizations** – We support the language of this Alternative, that one or more authorizations for day tours would be issued, but would initially suggest that NPS add “...up to a maximum of four.”
  - **Many potential 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? What impacts to Stony Hill site will splitting premium tours between Toklat and Eielson create? Though NPS states that consideration of roadside infrastructure is “beyond the scope of this plan,” some of the tour selections will have immediate infrastructural impacts. What about impacts to road maintenance camps and infrastructure, personnel, equipment and equipment storage?