

VEHICLE MANAGEMENT PLAN COMMENT DEADLINE LOOMS – HELP DCC MAKE A DIFFERENCE



Since DCC published our “Initial Reaction” to the National Park Service’s Draft Vehicle Management Plan for the Denali park road we have had many conversations with our members, other concerned organizations, and the National Park Service. DCC board members are still working on our final comments, but we have identified several ideas that we feel are extremely important for NPS to incorporate in its final decision. DCC’s response is driven by four principles:

- Protection of the character of the road, the wildlife, and wildlife viewing opportunities is paramount.
- A viable, affordable, and enjoyable transit system is important for the long-term viability of the park road and its vehicles.
- The most important part of the plan is the determination and allocation of capacity. Capacity determinations for the park road need to be readily comprehensible and enforceable.
- The plan must be comfortably within NPS’s capacity to implement.

BASED ON THE PRINCIPLES ABOVE, DCC OFFERS THE FOLLOWING THOUGHTS TO THOSE WHO ARE PREPARING THEIR OWN COMMENTS.

- 1. Both action alternatives in this plan make the determination of Road Capacity too flexible, too vulnerable to manipulation, too confusing and academic for the public to readily understand, and too expensive over the long run. We do, however, support the use of adaptive management to develop a defensible numerical vehicle limit and to optimize traffic within that limit.**

NPS considered but dismissed an alternative that would have utilized adaptive management within the current regulatory limit. A minor variation of that alternative would save time and money and develop a defensible limit for vehicles on the park road. Components include:

- Utilize the information gained from adaptive management and the traffic model over a more limited timeframe (3-5 years) to define a new limit that fixes the flaws in the 10,512 seasonal cap and utilizes the new information generated by the Road Capacity Study.
- Put the new limit, however it is expressed, into regulation and into the General Management Plan while providing comparative information so that the public can understand at a glance how the limit has changed and how it will be reflected in the bus system’s operations.
- Utilize the model and any additional adaptive management activity to optimize traffic patterns in succeeding years.

Our alternative would accomplish the NPS goal of creating a defensible capacity number while still retaining the enforceability of a regulatory limit, and would be much less confusing to the general public. It would not require annually revisiting the limit over an indefinite time period, a process which would be subject to political pressure. While we are in favor of monitoring impacts to wildlife and wildlife viewing opportunities, our alternative would limit the expense of these activities to a few years only, with less frequent follow-up monitoring. This limit can and should be developed within a fixed time period.

- 2. “Perceived value” is an inappropriate standard for ensuring the affordability of basic transit service at Denali. The Denali transit system, and all national park fees, should be priced to encourage all Americans to experience their shared natural and cultural heritage. Denali has an added responsibility to provide affordable transit since it does not allow visitors other options for traveling the park road.**

The plan defines an inappropriate standard for affordability. On page 45, the plan states “visitors’ perceived value of the transportation system will be assessed over time to guide decision making and ensure affordability of the system.”



Flaws in the “perceived value” standard of affordability are obvious. As a hypothetical example, what about the person who values a trip to Eielson Visitor Center at \$40, but only has \$25 to allocate to the trip? What if the people whose perceptions are being surveyed have income levels higher than the general public, and are willing to place a higher perceived value on the service than the general public might if given the chance? What about the people who decide not to take a bus because their perceived value of the ride – sight unseen – is less than the price of a ticket, even though their opinion would change if they actually took the trip?

“Perceived value” might be an appropriate standard for setting the value of tours, but transit is basic and – at Denali – required access. Typically in transit systems, standards for pricing would be rooted in making transportation affordable to those who can least afford it. Given that affordability is such a prominent goal of this plan, the plan needs to provide a clear and thoughtful standard for transit affordability and an analysis of its impacts. The standard should be based on the principle that NPS will ask visitors to pay the minimum amount necessary to enable the transit system to operate.

3. The Transit Priority must be strengthened. DCC supports the plan’s assertion that the “transit service would have priority” in allocating vehicle use. However, the plan needs to strengthen the tools that define and protect this priority.

“Hiker wait time” is the only tool in the plan that provides a sense of whether transit is operating at a sufficient level. Under the standard, up to 30% of hikers could have to wait up to 60 minutes for a pickup in any given year, 25% averaged over 5 years. This is a lot of people waiting a long time. The first part of the standard should be tightened.

In addition to a “Hiker wait time” standard there should be a “Departure wait time” standard. How long does someone have to wait to get on a bus into the park if they wish to go hiking, picnicking, etc.? For Alaskans on a spontaneous weekend trip into the park, the wait can’t be measured in days. In the end, overall vehicle capacity will trump departure wait time, but if transit is to truly have priority in allocations, then departure wait time is a crucial feature. Without this standard, how does NPS know when it needs to move buses from tour to transit? It can always leave enough empty seats on whatever transit buses are available to make sure hikers aren’t waiting that long along the road. “Hiker wait time” doesn’t speak to whether transit riders are being turned away at the Wilderness Access Center because there aren’t bus seats available. This is not particularly an issue now, but it was within the past 20 years and it could be again.

4. The plan should protect the remote character of the Wonder Lake and Kantishna region.

NPS should adopt the Wildlife Viewing Subzone 3 described in Alternative C, which would have more restrictive standards than the road east of Eielson. However, we believe this zone should be adjusted to extend all the way to the Old Park boundary rather than stopping at the Wonder Lake campground road.

We also support employing Commercial Use Authorizations for Kantishna day tour business. These tours are not legitimate ANILCA access and are best regulated using CUAs. We support the language of Alternative B which restricts authorizations to a maximum of 4 per day for all lodges combined.

PLEASE CHECK OUR VEHICLE MANAGEMENT WEBPAGE FOR MORE DETAILS AND SUGGESTIONS AS WE DEVELOP OUR DETAILED COMMENTS AND RECOMMENDATIONS. REMEMBER, COMMENTS ARE DUE ON OCTOBER 31, 2011.

<http://www.denalicitizens.org/denali-vehicle-management-plan/>