

October 30, 2011

Superintendent Paul Anderson
Denali National Park and Preserve Planning Team
PO Box 9
Denali National Park, Alaska 99755
SENT BY EMAIL TO Dena_Planning@nps.gov

Dear Superintendent Anderson,

Thank you for the opportunity to submit comments from the Denali Citizens Council on the Draft Denali Park Road Vehicle Management Plan and Environmental Impact Statement. The Denali Citizens Council, founded in Cantwell in 1974, is composed of more than 330 local, regional and nationwide stakeholders and park supporters. Our members have a unique perspective on Denali issues. Many live or have lived and worked in the park or Denali gateway communities. They understand from a personal perspective the implications of park policies and actions. We note that this plan has garnered an unusually passionate and interested set of responses.

Before addressing components of the plan in depth, first we must say that those who have contacted us regarding the plan overwhelmingly favor Alternative A – No Action. There is great mistrust of adaptive management as a substitute for regulatory limits on the park road. The mistrust seems to emanate from four distinct concerns: 1) a concern that NPS will lack the capacity to implement the research program; 2) a concern that the plan requires unattainable or undesirable vehicle movements and/or bus driver participation; 3) a fear that NPS will manipulate the complex research program and indicator/standard results to reach its own favored policies of the moment; and 4) a fear that annual reconsideration of limits will be much more subject to outside political pressure and manipulation than a clear, stable regulatory standard.

These are valid concerns which NPS must recognize and address. We will add one more to the list for context: to change an established regulatory limit NPS needs to provide the public with something that is as readily transparent and easily understood. The adaptive management scheme presented in the plan is the antithesis – it is complicated, multi-layered, and even linguistically tortured. The public at large cannot see the whole picture of what you are trying to accomplish.

This is not sufficient. At present, we have a clearly stated capacity definition for the park road. If we are going to give it up, we want an equally clear capacity that can be readily understood by the public and readily compared to the existing capacity. Otherwise, NPS is going to find it has little legitimacy when it needs to enforce its standards, and the process could become mired in controversy.

DCC Board

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The research accomplished to inform this plan is unprecedented in its scope and we should use that knowledge to truly strengthen the capacity limit on the park road through a new consensus on what that capacity should be. This plan does the opposite – tearing down a well-accepted limit and replacing it with a process that the public does not understand well enough to defend.

In addition, NPS has provided inadequate information as to whether the current capacity limit of 10,512 is not already creating degradation of park resources and creating a situation where NPS must upgrade and change the existing landscape in order to accommodate it.

DCC's comments will reflect the concerns of our constituents gathered from meetings, emails and personal communications. Our board of directors has also reviewed these comments. As an organization with a strong vision for the future of the Denali area, our bottom line is reflected in the following points:

- 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 entire transportation system.
- 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.

Several concepts in this plan are appropriate and needed, and reflect a good faith effort to listen during scoping activities over the past several years. We thank NPS for them. However, we have a number of suggestions for improvement of the Draft Plan. Please accept the comments below as our sincere effort to analyze this NEPA document fully and accurately.

I. A new EIS-level plan on road management may not be required.

A transportation planning process was completed fairly recently, in 1997, in the Entrance Area and Road Corridor Environmental Impact Statement (ROD, February 1997) intended to provide guidance to the National Park Service for the next 15-20 years (approximately 2017). Its intended lifespan has yet to be reached. The implementation of all its provisions is ongoing, including a number of implementation EAs. Some changes have been made, but the general policy intent and overall validity of this plan are not in question.

We therefore question why proposed changes in road management require a new, EIS-level plan **and** include major policy changes moving away from this well-vetted plan. We ask:

- a. What provisions of the 1997 plan have become deficient or in need of changing with EIS level work?
- b. If after careful consideration in 1997, NPS determined that the park road capacity limit of 10,512 was appropriate, what has changed? NPS knew then that it was not “scientific” in a strict sense. NPS also knew, then, that tourism pressures were growing and urged private developers to use discretion in their build-out of properties adjacent to the park, bringing visitors to the entrance of the park without the capacity to accommodate them in the more protected wilderness core park.

- c. If, as in the 1997 plan, NPS deemed it appropriate to put a road capacity number into federal regulation, why would NPS now decide this is no longer necessary or advisable? The Final 1997 plan established some allocation parameters for tour v. shuttle/transit v. private vehicles. These were not put into regulation and can be changed through an EA process. We do not oppose, outright, some changes in scheduling and tour allocations, as long as resources and well-settled policy directives are maintained.
- d. The 1997 plan, correctly, **paired** road management policy with infrastructure policy along the entire Park Development Zone, i.e. the road corridor. That approach was appropriate and valid, from the standpoint of a comprehensive setting and evaluation of desired future conditions. The current plan claims that no infrastructure changes would be required for implementation, yet alternatives self-evidently increase traffic to Teklanika Rest Stop and perhaps to Eielson Visitor Center without an analysis of impacts. We (and our members) wonder if NPS has fully thought this through.
- e. The 1997 plan pledged to develop a VERP program, managing for “desired future conditions,” and even presaged some of the indicators proposed in this program. The mandate for VERP, or adaptive management, stems from the 1997 plan, and the current Road Capacity Study, begun in 2006, can be considered an implementation of that mandate. The current plan is not unique or original in its advocacy of VERP. Additionally, there is nothing in the 1997 plan to indicate that VERP cannot be conducted within the context of a regulatory limit on vehicle access.

2. NPS has not given, in its Purpose & Need analysis on page iii-iv, a compelling reason for the specific changes advocated in this plan.

- a. The plan states, “The purpose of the proposed National Park Service action is to improve the management of vehicles along the 92 mile long Denali Park Road,” however the plan has not given specific information on how the current management requires improving, or how this change might simply take place in the context of the 1997 plan with EA-level implementations. NPS has not proved that the current bus management system has pervasive and important flaws that require a revolutionary new way to manage.
- b. The Draft VMP states that “trends indicate that visitation to Alaska and the Denali area will continue to increase,” as a defense for a re-examination of capacity determination, with an eye to increasing it. However this plan has not shown that there is any problem with increased visitation trends in the foreseeable future. Even if there were, NPS is not **obligated** to accede to new demand, after having spent several years building out the entrance area of the park with activities designed to provide a variety of services to meet that demand, and enlarging capacity along the park road consistent with the existing traffic limits. The strategy articulated in the 1997 Entrance Area and South Side plans for accommodating increased visitation was to provide facilities and programs in the Entrance Area and South Denali so that there was no need to increase traffic on the park road. Almost all of the entrance area facilities have been completed, but there is no explicit analysis as to whether it is working as expected.
- c. We know, from history, that vehicle use at Denali has approached the 10,512 cap during some years, and would have exceeded it if the DNHT were included in the actual allocation. This fact does not lead, however, to the inevitable conclusion that the 10,512 cap is no longer viable. Recent economic changes across the country have changed visitation patterns, and this change could be long term or even permanent.

- d. In addition, before any upward change in capacity is proposed, NPS is obligated to show that the current park road use levels are not degrading park resources. The Draft Plan should provide more detail in showing this.
- e. The Draft VMP states that the current vehicle limit “was not attached to more refined desired conditions in a logical framework that could be measured and monitored over time.” That may be true but it **does not follow** that NPS **must abandon** a vehicle limit in order to employ new monitoring and vehicle management strategies. We do not oppose the general concept of VERP, or Adaptive Management, as a research strategy.
- f. Use of VERP (or Adaptive Management) to monitor whether new destinations and scheduling options are protective of resources and visitor experiences is appropriate and could help with planning and avoidance of impairment. Using VERP as a trial and error system to manage a wholesale manipulation of vehicle numbers, with an eye to increasing traffic (by different amounts depending on the Action Alternative selected) is an inappropriate use of this process, considering its existing flaws and potential for manipulation (considered below).

3. Is the adaptive management scenario as presented this Draft Park Road Vehicle Management Plan adequately robust to protect park resources in the absence of a defined limit?

Our answer to this question is no. We are not necessarily opposed to changes in scheduling and allocation of buses, or to experimenting with new destinations for tour/transit, but only in the context of a regulatory limit. Information from the 2006-2010 Road Capacity Study can be used to establish a rough scheduling model and destination mix that will work well even within the 10,512 cap. The scheduling model could be adapted yearly, depending on what worked, what didn't. That NPS did not include an alternative that presents this option is a **deficiency** in this Draft Plan. We employ such an option in our suggested alternative, below.

The Draft VMP proposes adaptive management using indicators and standards as a more accurate, scientific method for determining vehicle capacity on the Denali Park road. It does seem sensible to use indicators and standards to set benchmarks for resource degradation and to use them as triggers for action to protect resources. The plan, however, will only be as accurate and scientific as the indicators/standards being employed. We have concerns about the science, as follows:

- a. **The indicators most predominantly employed in capacity determination, Tier 1, are overly weighted toward the “visitor experience” metric.**
 - i. Tier 1 indicators are all (except for “night time traffic levels” and “sheep gap spacing”) based upon visitor experience studies. These Tier 1 indicators are not insignificant indicators, but they measure only the surveyed views of park visitors, not the broad health of the park ecosystem and soundscape, the structural capacity of the road itself or the adequacy and the safety and capacity of roadside infrastructure. All these things are measures of the health and capacity of the Denali Park road. Tier 2-4 indicators, although monitoring a wider range of natural resource-oriented indicators, will not be employed as regularly as Tier 1 in the actual plan deployment, as we understand it.

- b. **Collection and monitoring of Tier 1 indicator data is subject to some problems with validity.**
- i. Tier 1 and Tier 2 indicators that utilize Denali Park drivers to input data carry with them a potential for validity challenges, related to the skill and willingness of individual data collectors, made more significant because of the large number of different individuals expected to input data.
 - ii. The “sheep gap” indicator appears valid, but may have been given inappropriate weight by being applied over the entire season. On some of the park road locations mentioned, sheep cross the road at only certain times of the year, and providing a gap is not particularly necessary or protective at all times. Sheep on Polychrome have become somewhat habituated to the existing driving scheme, and appear at the roadside with little regard for the buses. Monitoring of special, seasonal crossing areas for sheep and control of traffic at those times, is already being done by NPS. Maintaining a gap between vehicles may be desirable on its own, but should not be couched as protection for sheep if it really isn’t. We understand that drivers already make every effort to spread out between one another to provide their clients with the best possible experience.
 - iii. NPS states that GPS equipment will be mounted on all NPS vehicles and on all concession buses, by contract. The plan does not indicate how it will accurately track other vehicles that regularly use the road (e.g. employees of Kantishna businesses, inholders, Toklat employees, contractors on long term assignment in the park), introducing the potential for misinterpretation of data.
- c. **The standards, as listed in this Draft Plan, seem to be insufficiently responsive to damaging trends.**
- i. Five year averaging - Why is the assessment of desired standards based upon data that are averaged over five years? Although this averaging may serve to smooth out the data and eliminate insignificant variances, it could also create a situation where consistent near-violations at certain parts of the season are not given the significance they warrant. NPS should provide additional rationale for choosing five-year averaging.
 - ii. The percentage violation of desired standards required to trigger action is inadequate in the Hiker Wait Time Standard. For more on this, see our discussion below.
 - iii. Two season time lag – To change capacity numbers and scheduling models in response to indicator/standard data, NPS proposes to use the Superintendent’s Compendium, but because of the time lag between generation of the number/scheduling model and publication in the Compendium, the new numbers each year will not be incorporated for two seasons. This time lag is curious in a system that purports to be flexible, accurate, scientific and responsive, and is unacceptable if indicators are exceeding **minimum standards**.
 - iv. We are very concerned about the note at the end of Table 5 (p.80) that allows an indefinable “small percentage” of standard violations on top of the already-generous percentage exceedances written into the standards. This appears to allow NPS the latitude to simply ignore inconvenient standard violations rather than taking action to remedy the problem and ensure it won’t happen again.

- d. **Standards, in some cases, may not be adequately enforceable or easily achievable.**
 - i. An indicator/standard should be employed in an adaptive management scheme only if management actions have some chance of success in enforcing it. We question, for example, how successfully the sheep gap spacing standard can be achieved, given the relatively random movement of buses and other vehicles, even if release times from headquarters are timed to include the gap.
 - ii. In a scenario where additional tour/transit traffic is scheduled for Eielson Visitor Center, violation of the viewscape standard at Mile 62 (Stony) would be likely. We would advocate for **no change in the volume of bus traffic** and a minimal substitution of tour for transit, if NPS sends a tour to Eielson.

- e. **Some indicators/standards are inadequate or missing.**
 - i. For example, Hiker Wait Time, discussed later in these comments, is the only indicator that protects transit, and its 30-60 min wait time standard is weak. See the DCC solution in our proposed alternative, below.
 - ii. The NPS method for measuring affordability of the transit system is flawed by being based on a survey of existing park users without taking into account the views of those who were turned away by the expense. See the DCC solution in our proposed alternative, below.
 - iii. **Stony Hill** – there should be a “number of vehicles parked” standard for this overlook.
 - iv. **Primrose** rest area – there should be a “number of vehicles parked” standard for this overlook.
 - v. **Polychrome Overlook** – even without restrooms, the number of buses and people at this spectacular stop would seem to be a critical area for protecting the visitor experience – why is there no standard here?
 - vi. With any Alternative that would change destinations from the current situation, specific limits should be identified for all parking areas that are created.

- f. **Implementation of this entire monitoring, modeling and management strategy will experience a number of influences that are not entirely predictable. We have concerns about how this adaptive management strategy can remain clean, valid and protective over a 20 year time horizon.**
 - i. Details of plan implementation will depend on exigencies associated with the concession contract, including negotiation of franchise fees (which are proposed to pay for the plan monitoring), purchase, installation and maintenance of hardware for the monitoring program, development of driver mandates and rules of the road, and a host of other elements, any one of which could significantly weaken elements of the AM scheme.
 - ii. The actual crunching of the monitoring data to create a report on the health of the park road remains obscure in this Draft Plan. How much of the interpretation of the Tier 1 monitoring data will be left to discretion? If desired standards are violated during the first four years, but not minimum annual standards, will any action be taken, or will NPS wait for the fifth year averaging? How will NPS prioritize actions in its toolbox to address trends that have not risen to the level of impairment?

- iii. We are concerned that over the years NPS may be unable to avoid a “drift” in the standards to numbers more favorable to growth. What about the addition of new standards? How will this complicate the modeling and interpretation of data?
- iv. Affordability of the monitoring plan in declining federal budgets is a huge problem. Base funding will be required for additional staff, and this in an environment in which the park has been not fully staffed for some time. In addition, we question the long term priority this plan will have in allocation of franchise fees. We understand that elements of the park’s resource stewardship strategy are funded by franchise fees, and fear that some park programming will suffer if the monitoring as specified in this plan is fully implemented for 20 years.
- g. **Finally, can an adaptive management plan, because it must use numerically measurable indicators, incorporate the intangibles into decision making** - the full range of values and influences that constitute a healthy national park road, including the Murie vision for road character, the importance of minimizing infrastructure at road’s edge, the mandate that this road be a narrow corridor through a wild and scenic land?

4. Neither Action Alternative in this plan is acceptable to DCC and its membership.

- a. Alternatives B and C employ adaptive management without the context of a regulatory limit, which is unacceptable for reasons outlined above.
- b. Both Action Alternatives offer ways to increase traffic on the Denali Park Road, but the park has not adequately, in our mind, proven that the existing traffic amounts are not damaging resources.
- c. The range of action alternatives is not comprehensive enough. NPS has not offered an Action Alternative that maintains a regulatory limit, which could logically have been done. NPS should have, in addition, offered an Action Alternative that proposed **no increase** in road traffic but with some of the potentially productive actions proposed in the Draft Plan, as was described in Alternatives Considered but Dismissed.
- d. Both Action Alternatives support the creation of a short tour to Teklanika without fully analyzing reasons for this change OR impacts of it.
- e. **Some specific stipulations of each Action Alternative seem to be at odds with the protection of resources and visitor experience along the park road. In particular, we are concerned about the following:**
 - i. **Alternative B –**
 - We oppose the use of larger buses on Wildlife Viewing Subzone 1 west of Savage as far as Teklanika.
 - We do not support the “maximization of access” concept as stated in this alternative.
 - We oppose attaching a reserved seat to self-guided economy tour. It is not necessary if transit is adequately protected by strong standards and creates a management complication for transit drivers.
 - We oppose the picking up of hikers by premium tour as a regular practice.

- We oppose a “tents only” campground at Teklanika, and continue to support RV access within safe size parameters.
- ii. **Alternative C –**
- We support the Management Zone concept in this alternative, with alterations as above, but would alter the description of Wildlife Viewing Subzone 3 (see below). We cannot have an opinion on the Special Use Zone between Kantishna and Wonder Lake unless more information is made available on why it exists.
 - We support additional definitions and indicators to ensure Affordability and Priority of Transit – see detailed discussion below. We support the NPS obligation to maintain Transit as a demand-based system.
 - We oppose having a separate bus or reserved seat allocation under Economy Tour, and in general prefer that the transit service not be complicated by Economy Tour. Having interpretive materials available for separate cost is not a problem, however.
 - We oppose the language in Alternative C regarding the award of Commercial use Authorizations for Kantishna Day Tours.

5. The Draft VMP appears to abolish a very important constraint on the growth of Kantishna traffic without analyzing the impacts or explicitly replacing it with anything else.

Increasing demand for transportation to the inholdings in Kantishna remains an important factor that could upset road management at Denali. The 1997 *Entrance Area and Road Corridor DCP* provided for a specific allocation of 1,360 vehicles for Kantishna per season. This clearly delineated cap on vehicle use provides a clear tool for communicating to present and future Kantishna landowners the limits of potential commercial access to their properties. While the 1,360 number has never been approached, it does provide some certainty in allocating traffic for other uses.

The *Vehicle Management Plan* apparently does away with this important limit without even acknowledging that it is doing so, and offers no explicit replacement. Because future development on Kantishna inholdings could result in additional traffic demands that could displace other traffic on the park road, we feel that steps must be taken within this plan to as clearly limit Kantishna traffic as the 1997 DCP. Our first choice is simply to retain the 1,360 vehicle limit from the 1997 DCP, even if the other allocations in that plan go away. Other provisions in the VMP would also help, such as limiting day use trips through CUA’s as in Alternative B and the creating the new Wildlife Viewing Subzone 3 in Alternative C.

6. The Draft Vehicle Management Plan identifies an inappropriate standard for affordability, and as a result fails in one of its goals.

In setting its goals for the Vehicle Management Plan, the National Park Service appropriately lists as Goal 5 to “Provide a transportation system that meets visitor access needs” with an accompanying objective to “Develop a system that is affordable and offers opportunities for the full range of park visitors.” However, the plan describes a system that accomplishes neither the goal nor the objective. Affordability is addressed in only two ways within the alternatives. First, the

plan sets a standard for transit system affordability in Actions Common to All Action Alternatives (p.45) that is based on visitors' "perceived value" of the bus service. Second, alternatives within the plan describe an economy tour that is priced in between the premium tour (such as the existing Tundra Wildlife Tour) and the transit buses (such as the existing VTS system). Neither of these actions addresses the protection and improvement of the affordability of basic park access.

The Denali park road management system is unusual because access to the most basic park experience – wildlife and scenic viewing along the Denali park road – requires utilizing one of the bus systems. With the exception of a few hardy cyclists (and even the most ambitious of those usually utilize buses for part of their trip), visitors are compelled to utilize the park bus system to see the park. For this reason, it is imperative that the cost of the experience be kept as low as possible, both to encourage visitors to experience the park and to ensure equity in access. The subsidized pricing structure of other public transit models is thus appropriate for the park road "transit" service.

The standard in the Draft Vehicle Management Plan reveals a different goal for NPS at Denali. By articulating the standard for affordability to be the "perceived value" for those utilizing the system, several errors are committed. First, NPS demonstrates that it is pricing the transit system by thinking of it as any other commercial service. "Perceived value" is a pricing mechanism for commercial products or services that contrasts with producer cost-based pricing. Its objective is to increase revenues by pricing to the customer's valuation of the product or service, potentially increasing profits over a price that is wedded to the cost of production plus some increment of profit. But this misses the point with transit which should be thought of as a public service, where the goal is to entice people to use the buses by offering them a good deal, and to ensure equity of transportation access for people of all income levels. When NPS staff compares the cost of a Denali trip to commercial coach service along the Parks Highway, they are equally making the wrong comparison of a profit-making commercial service to something that should be a low-cost public service, even if the service is delivered through a private company.

Other problems with the "perceived value" standard are easy to hypothesize. What about the person who values a trip to Eielson Visitor Center at \$40, but only has \$25 to allocate to the trip? NPS may end up denying access to that person. What if the people 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 person who decides 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?

NPS staff argue that the equity effects are difficult to measure because it is difficult to identify displaced visitors or to survey them regarding perceived value. It is also difficult to find relevant literature on the subject because the Denali system is so unique, but perhaps it is fairest to think of the bus fares as effectively being user fees since visitors are compelled to pay them to enter the park. The literature regarding equity and user fees is inconclusive, with many studies finding no change in visitation after user fees are imposed while others finding that some low income people are influenced by price.¹ However, it is notable that most user fees tested in research are well below the combined entrance fee/bus ticket cost at Denali, and may not be reflective of the case

¹ E.g. Burns, R. & Graefe, A. (2006). Toward Understanding Recreation Fees: Impacts on People with Extremely Low Income Levels. *Journal of Park and Recreation Administration* 24(2), 1-20.

here. However, the National Park Service could avoid the dilemma by choosing a different standard for the price of the transit service and avoid the equity issues altogether (see below).

Perhaps the most useful study is one that argues that user fees influence visitor's decision to visit public lands as a portion of the overall cost of a trip.² NPS staff at Denali have also argued in conversations that the cost of a Denali bus trip is such a small part of the overall cost of a trip to Alaska that the transit fare is inconsequential. However, this is not the case for Alaskans or seasonal employees who live along the road system, who should be among the park's most regular visitors. But for these groups, the combined price of VTS tickets and entrance fees would be a substantial portion of the cost of trip.

We note that many national parks now offer a “free” transit service to park visitors. In a few cases, there are portions of the parks where access is restricted to transit (Zion, Grand Canyon). Often the cost of transit is covered by charging a transportation fee add-on to the park entrance fee. We understand Denali is different because of the length of trips in the park and the challenges of driving the park road. Denali also has many fewer fee-paying visitors than many of these parks. However, all of these parks find value in offering a very low-cost service. We don't see that being an important goal in the Vehicle Management Plan, but it should be.

In the DCC alternative below, we suggest a better standard and more active approach to achieving the goal of affordability for basic access to Denali.

7. The DCC Alternative - we combined the useful concepts of this Draft Plan into a better management alternative that retains the essence of the 1997 plan.

Although we remain doubtful that a severe problem in transportation management exists at Denali, we are willing to consider the concept of changing bus allocations, schedules and tour types, as long as such a change will not impair resources. The two action alternatives in the Draft Plan do not explore the full range of possible management strategies for achieving this end, and are focused more narrowly on how access can be increased.

We are convinced that NPS' proposal to abandon the regulatory limit and employ Adaptive Management as a central strategy for arriving at a series of indefinite capacity numbers over the years is not the best or only way to manage traffic at Denali National Park and Preserve. We are also convinced that neither of the Action Alternatives (maximizing access/maximizing flexibility) should be a central theme or purpose of the new system.

Therefore DCC has developed a unique alternative that provides a more protective choice to the ones available in the Draft Plan. Our alternative:

- accepts that some scheduling changes can better protect the visitor experience along the park road, but should be made and vetted within a regulatory limit.
- advocates for keeping the bus types and destinations simple and identifiable, within a system that does not look a lot different from what we have today.

² Ostergren, D., Solop, F. I. & Hagen, K. K. (2005). National Park Service fees: Value for the money or a barrier to visitation. *Journal of Park and Recreation Administration* 23(1), 18-36.

- better protects transit, which is an obligation of NPS to provide to visitors.
- better protects transit system affordability, making this system more accessible to Alaskans and other independent visitors.
- provides an overall strategy to protect the Kantishna/Wonder Lake region, utilizing a mix of ideas from the Draft Plan.

Here are details of the DCC Alternative.

- a. **The DCC Alternative for carrying capacity, explained below, avoids some of the potential weakness of adaptive management by utilizing it for a research purpose within the context of a regulatory limit, over a limited time horizon.**

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:

- In the near term, retain the regulatory cap of 10,512 vehicles west of Savage.
- Utilize the information gained from adaptive management and the traffic model to adjust scheduling and bus allocations.
- Over a limited timeframe (3-5 years) define a new limit, if indicated and protective of resources, that fixes possible flaws in the 10,512 seasonal cap, using information gathered from the Road Capacity Study and monitoring.
- Put the new limit, however it is expressed (seasonal and daily limits, even hourly limits), into regulation and into the General Management Plan within five years from the Record of Decision, while providing comparative information so that the public can understand at a glance how the limit has changed, if it has changed, and how it will be reflected in the bus system's operations.
- Utilize the traffic model and any additional adaptive management activity to optimize traffic patterns in succeeding years, under the new cap.

The DCC Alternative would accomplish the NPS goal of creating a defensible capacity number while retaining the enforceability of a regulatory limit. It would not require annually revisiting the limit over an indefinite time period, thereby avoiding some of the problems and expense associated with the adaptive management method and the time lag to publishing in the Compendium. The DCC Alternative would limit the expense of monitoring and modeling activities to a few years only, with less frequent follow-up monitoring. We are confident that a defensible carrying capacity number can be developed with reasonable accuracy within a fixed time period. We sense that NPS already has enough data from the Road Capacity Study to come up with a rough approximation of that number right now. We recognize that the limit may be expressed differently – perhaps a daily or hourly limit with different limits for the 2 (or 3) management zones along the road, but it should be possible to calculate a seasonal number for the sake of comparison.

b. The DCC alternative would continue strict limits on traffic to Kantishna in order to avoid future uncontrolled increases in this traffic, which could destabilize NPS road management.

Here is what we would like to see:

- Our first choice is for NPS to simply retain the limit of 1,360 vehicles per season from the 1997 DCP. It still has validity even if NPS changes the 10,512 overall vehicle limit, and requires no action other than an acknowledgement that it still exists.
- We support elements from Alternatives B and C that will also help limit Kantishna traffic, although we cannot tell from the NPS analysis whether these actions would be sufficient on their own to limit growth in Kantishna traffic, so we cannot support them as a substitute for retaining the existing 1,360 vehicle limit. These are:
 - The commercial use authorization for Kantishna day tours described in Alternative B that limits the authorization to no more than four day tours per day for all lodges combined.
 - The creation of Wildlife Viewing Subzone 3 described in Alternative C, which seeks to preserve the lower traffic volumes presently found on the section of road between Eielson Visitor Center and Wonder Lake. We do, however, believe the zone should extend along the Wonder Lake Campground road and along the main road to the Old Park boundary rather than stopping at the road junction.

c. The DCC Alternative better protects Transit service priority than the Draft Plan.

DCC supports the statement in Actions Common to All Action Alternatives (p.45) that the “transit service would have priority” in allocating vehicle use within the transportation system. However, the plan needs to strengthen the tools to define and protect this priority. It needs to strengthen the one indicator that protects this service and add an additional indicator to further protect Transit.

- The principal (perhaps only?) tool to defend the transit system priority is the Hiker Wait Time indicator. We support the standard, but question the rationale for the particular values selected. What is the justification for allowing 25% of hikers to wait more than 30 minutes and up to an hour (or more)? We would prefer to see a tightened standard which leaves fewer people waiting so long. Our main concern is for the first row of the standard, which we would like to read:

At least 90% of hikers will have wait times of less than 30 minutes for pick-up by a bus, averaged over 5 years.
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No one year will have less than 85% of hikers with wait times of less than 30 minutes.
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We could entertain the possibility of having the existing standard described in the plan apply to the less-traveled Wildlife Viewing Subzone 3.

- In addition to a “Hiker Wait Time” standard there should be a “Departure Wait Time” standard. How long does someone have to wait to for a bus from the Wilderness

Access Center into the park if they wish to go hiking, picnicking, etc.? 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 within the next 20.

d. DCC's alternative would keep Transit and Tour identifiably separate and consider more equitable ways to operate and market Transit at Denali.

After much thought, DCC has come to the conclusion that the original distinction between the tour buses and buses that visitors use instead of their cars for independent sightseeing and transport still makes sense. While the proposed "economy tour" was worth investigating, in the end it may just confuse visitors more. We believe that putting economy tour and transit on separate buses – as in Alternative C – would be too inefficient. To maintain service levels, it would be necessary to run almost the entire slate of VTS buses twice in order to both maintain the Hiker Wait Time standard for transit buses and to carry all the passengers who just want the tour. To try to distinguish the two services on a single bus system – as in Alternative B – just seems confusing to explain. How does someone on the phone or at the desk in the WAC explain that visitors need to pick which service they are taking, even though it is the same bus? What about the visitors who might want to get off and hike for a while, but won't be sure until they are out in the park and can evaluate the landscape and weather conditions? If fares are differentiated as is suggested in the alternative, then don't some feel as though they are being shorted, or try to game the system by claiming they are transit riders when in fact they wanted the tour? Using an economy tour fare to guarantee a seat is problematic at best, and should not be needed if the Hiker Wait Time standard is not exceeded.

We suggest four improvements to the existing arrangement.

- Change the labeling for the VTS, which has always been a lousy name/acronym for marketing purposes. Finding a good label is challenging, but it needs to be done. "Denali Sightseeing and Hiking"?
- Offer self-guided materials as an add-on to the transit service rather than as automatic inclusion of an "economy tour" as suggested in Alternative B. This allows all visitors to travel the park road for the minimum price if they so choose. No seat guarantees would be made.
- To distinguish the transit part of the service, price tickets by the distance the visitor is traveling rather than by the bus turnaround destination. In other words, if a group just wants to go as far as Mount Wright to hike, they don't have to buy a bus ticket to Eielson or Toklat. The road could be divided into zones and tickets color-coded to make it easy to identify for which zone travel is allowed. Visitors unsure about their destination would be encouraged to buy a ticket all the way to the turnaround. Such a policy would also assist with affordability, particularly for repeat visitors who know what they want to do.

- Turn the reservation system for tour and transit over to a 3rd party which is either compensated by a flat fee or on a per transaction basis, without reference to the value of the tickets sold. This would help to ensure equitable marketing of the tour and transit opportunities.
- e. **DCC’s alternative would establish an appropriate standard for the affordability of basic access, and include a commitment to an ongoing process of pursuing least-cost transportation options for visitors. This approach requires NPS to look at the Transit service differently than it does at present. We would like to see:**
- NPS treat transit as a public service, not a commercial service. The agency presently provides this service through the park concessioner, but that arrangement should not define its understanding of the service, and the agency should always be open to other ways of providing this service in the future. We reject comparisons of the Denali transit service to commercial bus services; the proper comparisons are with other public transit systems.
 - A standard for affordability that is grounded in providing the service at the least possible cost to visitors. For the near term, this standard may not result in different pricing for transit than at present, but it avoids the danger of allowing higher and higher prices being charged under the standard of “perceived value.”
 - A goal in the plan of developing least cost solutions to the provision of basic access at Denali. Continuous improvement in transit pricing through identification of subsidies, reduction of operational costs, and exploration of alternative modes for service delivery is essential.
 - NPS asserts that presently the revenue from the various bus tours subsidize the cost of the VTS transit system. This seems a critical fact for understanding the affordability issues of the VTS, but there is no analysis in the plan. We would like the EIS to include the annual operating cost of the VTS, the annual revenues from VTS, and the amount of subsidy derived from tour revenue. We realize that some of costs are interlocked, such as the cost of the bus wash and maintenance facility and administrative expenses, but it should be feasible to tease out the portion of each that can be attributed to VTS.
 - Taken together, the points above also point toward an investigation of ways in which transit and tour could be decoupled. Combining those services with different purposes under one concessions contract seems to create some perverse incentives and expectations. The decision to combine the services in the early 1990's was not well-supported at the time, and we wonder why NPS has never investigated the potential benefits of splitting them apart again, though we recognize there is some simplicity involved in having a single operator (mostly) along the park road.
- f. **Other elements. The DCC Alternative selects additional concepts from the Draft Plan that will most effectively protect park resources and road character. We list them as follows:**
- i. **Keep Tour destinations and stops very similar to the way they are now –**
 - a. We suggest that Premium Tour to Eielson replaces no more than 2 transit buses per day and that tour plus transit together not increase traffic to Eielson pending further analysis of the fragile landscape next to the park road between

Stony and Eielson. There should be no increased tour to Kantishna beyond what is already done by the Kantishna Experience.

- b. The short tour to Teklanika may be acceptable but has impacts that have not been analyzed in this plan. In any case, the reasons to extend the short tour to Teklanika have not been adequately explored. There could continue to be some short tours that turn around at Primrose.
 - c. If Premium Tours are expected to use the Stony Hill viewpoint, the plan should specify a “number of buses” standard for this pullout.
 - d. NPS has not adequately addressed, under “existing conditions,” the evaluation of the resource condition at the Polychrome overlook after toilets were removed from this location. Several park users have informed us that there have been impacts from this removal, not all of them positive. Has NPS decided to leave comfort stations off Polychrome? In any case a “number of buses” standard is needed for this overlook.
- ii. **Priority of MSLC interpretive programs above commercial tour** – We support this concept in principle, but only after the plan presents greater detail on how it will be implemented. Will there be dedicated MSLC vans or will the MSLC use transit buses, what is the expected daily impact of MSLC programs on the park transportation system, etc.? Will MSLC vehicles be monitored using Tier 1?
- iii. **Teklanika access** – We support ongoing RV access to Teklanika, but we believe that it is fair to request those with private vehicles to access the campground during times of lower bus volume, when necessary to maintain standards.
- iv. **Professional photography and film crews bundling of permits** – We support the bundling of the two types of permits.
- v. **Bus design** – We, generally, support the design vehicle as described in the Park Road Design Standards. We oppose MDX buses west of Eielson. We hope NPS will attempt to avoid the situation that has developed over the years of designing the road to fit the bus instead of using buses that fit the road.
- We suggest development of a custom bus that fits within Design Vehicle and Road Design standards**
- We note that the off-the-shelf buses used at Denali are not ideal for other reasons. Many buses have windows that fog or are easily muddied on rainy days. Windows are difficult to open, and are divided across the line of sight. Some buses produce an excessive amount of dust, or are less adept for driving on some portions of the road. We believe all of these issues could be addressed by designing a custom bus for Denali, and encourage NPS to pursue the design of such a bus.
- We support the efforts in Alternative C** to enhance comfort on tour buses by reducing the number of seats.
- vi. **Camper bus** – DCC’s alternative supports continuation of dedicated Camper Buses with inside storage. However, we are sympathetic to the goal of having all buses in the transit system be able to pick up backpackers and campers, and for backpackers and campers to be able to depart the WAC on any transit bus. A custom bus design could also enable this arrangement, and allow for the elimination of camper buses in the future.

8. Given the need for additional public understanding and a greater range of choice, we suggest that the agency complete a revised Draft VMP with the following new information.

- a. **A new alternative/s** using adaptive management in the context of an overall, regulatory limit, and no increase in road traffic. Only then will the full range of alternatives be available for public comment.
- b. Revised **cost analysis**, including what franchise fee programs may be at risk in order to operate this plan, and how this plan could affect base funding for NPS staffing positions and other bus-related services.
- c. More information to show that the existing transportation capacity number (10,512) is not already degrading park resources.
- d. Impacts analysis of relevant infrastructural changes triggered by this plan, especially at Teklanika.

Summary

DCC feels the most significant issue in the plan is the determination of carrying capacity on the park road. We acknowledge that there are some problems with the manner in which the existing seasonal road capacity limit has been defined and implemented. However, we do not feel that NPS has made a compelling case for altering carrying capacity at this time, and its proposed alternative capacity lacks sufficient clarity and cost effectiveness to be a useful substitute. The Action alternatives ignore potentially destabilizing details such as traffic to Kantishna, do not sufficiently protect the transit priority, and have some significant problems with indicator selection and implementation. Both plan alternatives also establish an inappropriate standard and lack a focused effort for ensuring the affordability of basic access at Denali. The document is deficient as an EIS because it fails to consider a full range of reasonable alternatives, despite these obviously having been pointed out to NPS during scoping. Some other action items (or variations) in the plan are potentially worthwhile but could be accomplished with an EA or other lower-level document.

We do believe that adaptive management potentially has great value for managing the park road, and applaud the research that has been a part of the park road study. However, we also believe in the value of a defined carrying capacity for the park road that can be easily understood and communicated, that the appropriate role for adaptive management is to help **support** that number, to optimize traffic within the defined capacity, and to alert managers to serious problems.

Again, thank you for the opportunity to comment and for making your staff so available to us for questions. This has been one of the most active comment periods in recent memory, and well it should be. The numerous stakeholders, drivers, employees, tourism, inholders, individual users, stand to be profoundly affected by the actions in this plan. That is why we suggest a Revised Draft – to clarify how the plan will actually work and to provide a greater range of alternatives from which to choose.

Sincerely,



Nancy Bale, Director
for the Denali Citizens Council Board and members