

July 20, 2012

(SENT BY EMAIL)

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

RE: Final Denali Park Road Vehicle Management Plan and Environmental Impact Statement

Dear Superintendent Anderson,

Members of the Denali Citizens Council Board of Directors have reviewed the Final Denali Park Road Vehicle Management Plan and Environmental Impact Statement. We appreciate some of the improvements made from the draft, and support the inclusion of a daily vehicle limit in the final plan (if not the specific limit chosen). However, we are disappointed that some items have not received attention, and that our substantive comments on these topics did not receive a reply. We hope NPS will be able to clarify the intent of some of these items in the Record of Decision.

Our comments are organized as follows. There are five very important topics we feel need NPS needs to address in the ROD, which are summarized below. Second, we provide a list of clarifications and suggestions intended to improve the final plan. Finally you will find an attachment with quotes from our original comment that support our points, and which we feel were not addressed either in the Final plan or response to comments.

1) The final plan needs a better standard for determining appropriate costs for the transit service.

The Final EIS continues to define the affordability of the entire transportation system using a “perceived value” standard (see page 43 of final, top of right column). DCC’s comments demonstrated several reasons why this standard was inappropriate for the transit system, and argued that basic access should be priced according to a “least cost” standard. Please see the attachment for a complete articulation of this argument. We believe NPS actually shares our concern for keeping the cost of transit and basic access as low as possible, and suggest the following clarification for the ROD:

The affordability of the tour system will be guided by the assessment of the perceived value of the service to the visitor. However, for the transit service NPS will strive to achieve fares that represent the least cost to visitors in order to maximize the public’s ability to access the park. NPS will continually assess means by which the visitor cost for the transit service may be lowered.

DCC Board of Directors

Nancy Bale
Barbara Brease

Nan Eagleson
Charlie Loeb
JJ Neville

Hannah Ragland
Erica Watson
Jared Zimmerman

2) The final plan does not successfully operationalize the “transit priority” that it asserts.

DCC is pleased that transit still is identified as the priority service, and recognize that other commenters challenged this stance. We appreciate NPS’ holding firm that the first mission is to provide basic access to the park. However, we fear that without a clear standard other than “Hiker Wait Time,” the transit service will eventually be eroded. We suggested a “Departure Wait Time” standard in our comments, which NPS dismissed without refuting our justification. We offer the justification again in the attachment and suggest the following clarification for the ROD in the absence of a clear standard:

Along with other monitoring protocols in this plan, NPS will monitor and report the departure wait time for visitors trying to access the transit system from the entrance area of the park. This monitoring would include both the wait time for visitors who try to buy bus tickets once they arrive at the park as well as the gap between preferred departure times and available departure times for those who make reservations by phone and online.

We recognize that transit buses are not crowded at present and departure wait time is not an issue. We also recognize that NPS and the concessioner have tools which work in this low-demand context to minimize wait time for transit passengers. However, many of our members recall long waits for transit buses in the past, and can foresee a future where demand may rise again. However, if tours swallow much of the available capacity in the near term, it will be very difficult in the absence of a clear standard to take seats away from tours if the park road again moves toward full capacity. Monitoring departure wait time will at least provide an early warning system.

In addition, we are concerned that the monitoring and averaging protocol (five year averaging) for the Hiker Wait Time standard could allow repeated violations of the most protective standard over a long period before correction could occur. We understand that, currently, the Hiker Wait Time is monitored by bus dispatchers at Eielson, who attempt to control wait times by asking for “sweeper” buses. Little is said in the description of this VMP about the “on the ground, day-to-day” operation around Hiker Wait Time. We would appreciate a more detailed description of day-to-day activities designed to minimize Hiker Wait Time.

3) The daily limit on vehicles traveling west of Savage River needs further analysis before it becomes a new regulation.

DCC supports the concept of daily limits on park road vehicle traffic, which generally make more sense than a seasonal limit. We also support the inclusion of all vehicles that travel west of Savage checkpoint within the computation of the limit. However, we challenge NPS’s plan for a new regulation specifying a maximum 160 vehicles per day in the Final EIS without a *Revised Draft* or *Supplemental EIS*. While NPS insists that the idea of a limit was included in Alternative A of the draft plan, the fact that Alternative D (NPS Preferred) would require a change in an existing regulation belies the idea that this daily limit was really an “Alternative A” action. We feel that there is room to explore many alternatives for a daily limit, such as different limits for the various management zones, different limits in shoulder seasons, and the specification of an “average daily limit” in addition to the “maximum daily limit.”

We are very concerned that the upper limit is based on modeling only, in the virtual absence of real-world monitoring of traffic at this level. This limit allows for dramatic increases in daily traffic and has very rarely been reached on the park road. When vehicle traffic has reached 160 vehicles per day or more, it was at times of heavy nighttime vehicle construction traffic which was shown to be correlated with lower wildlife viewing in the following mornings. We note that it should be possible to field test high daily traffic volumes within the existing regulatory limit before making a change to the regulation. We also note that 160 seems to be at the outer edge of what standards would allow, and wonder why NPS has not chosen a more conservative daily limit that would still allow some expansion in daily traffic while testing to see if the standards hold up under real world conditions and making sure traffic spikes do not impact wildlife viewability or other factors that are not in the model.

Our primary objection at this stage is moving forward on a new regulation based on a specific, untested number that has not truly been through NEPA compliance. However, we have a proposed solution that would allow NPS to move forward on plan implementation while providing a greater consideration and evaluation of daily limits:

- 1) **In the ROD, indicate that NPS will move to promulgate a new regulation establishing a daily limit on park road vehicle traffic.**
- 2) **Commit to a program of experimentation over 2-3 years to provide real-world data of conditions under a maximum daily vehicle limit. DCC urges NPS to consider a conservative number of 145 vehicles per day as the maximum daily limit for traffic on the Denali park road. The monitoring will demonstrate whether standards can be met and wildlife viewing opportunities sustained under a higher-traffic regime.**
- 3) **When necessary, issue temporary regulations to allow seasonal vehicle numbers to exceed 10,512.**
- 4) **At the end of the experimental period, conduct an Environmental Assessment that looks at different limits and methodologies for setting limits. The EA would hopefully examine not only the maximum daily vehicle capacity, but also an average maximum capacity, varying limits for different sections of the road, and varying seasonal limits.**
- 5) **Promulgate a new regulation based on the alternative selected from the EA.**

We believe the Final preferred alternative is on the right track with a maximum daily vehicle limit, but we cannot see that it is in the park's interest to establish a limit based on the most extreme number that might be achievable.

4) Please reinforce in the ROD the assertion in the Final plan that no changes will be made to infrastructure to accommodate the actions in the plan (p.38, Actions Common to All Alternatives).

The environmental analysis in the Final plan was completed with this assumption. The ROD should make it clear that if actions taken lead to visitor volumes that adversely affect the visitor experience, rest stop capacity, or the park road itself, then the actions will be scaled back rather than infrastructure expanded.

There are three places where we are particularly concerned:

- a. We are wary of increasing the size of buses in Wildlife Viewing Subzone 1, and do not see any demonstrated need for studying the change. The ROD should clarify that if larger buses

end up causing increased road maintenance or new road construction, then the use of such buses will be discontinued.

- b. We are concerned that sending short premium tours to Teklanika Rest Stop will require the facility to be expanded. Again, the ROD should clarify that if rest stop standards or facility capacity are exceeded at Teklanika Rest Stop, then premium tours to this destination will be reduced. While the budget in the final plan is too general to see what is in it, we felt the trail and rest stop improvements at Teklanika in the budget of the Draft plan (see p.265) belied NPS assertions that no new infrastructure would be required to implement the plan. If in fact NPS feels that Teklanika Rest Stop requires some expansion to handle additional short premium tours, then the environmental consequences should be analyzed as part of this EIS.
- c. Likewise, the same clarification should be made for extending premium long tours to Eielson Visitor Center or any expansion of Kantishna day tours (since no limit on these is specified in the plan). The ROD should clarify that if rest stop standards or the facility capacity is exceeded, then the tours must be changed rather than expanding the facility.

Our suggestion for the ROD is as follows:

Implementation of this plan does not require improvements to or enlargement of facilities, but is intended to more efficiently use the existing park road infrastructure. Preserving the character of the park road and the visitor experience on the road are important goals of this plan, and actions that would require a greater infrastructure footprint would be contrary to these goals. If actions in this plan result in excessive demands on the park road or its associated rest stops that would require infrastructure improvements to address, the actions will be scaled back rather than new construction initiated.

5) Concession-authorized day tours operated by inholders should clearly be included within the 1,360 allocation limit for vehicles to Kantishna.

We applaud NPS for its clarification in the Final plan that the Kantishna allocation from the 1997 *Entrance Area and Road Corridor DCP* remains in effect, and that day tours are to be treated as concessions rather than 1110(b) access. However, the Final plan leaves some confusion about whether the 1,360 applies only to 1110(b) access or also to the concession day tours to Kantishna lodges. Day tours were included within the limits in the 1997 plan, and we believe that should be sustained. This is particularly important since the Final plan does not specify any limits on the number of day tours, nor a specific vehicle capacity for the new Wildlife Viewing Subzone 3, both of which we feel are also important. At the very least, it seems the ROD needs to clarify whether the day tours are counted or not, and we suggest the following clarification:

This plan makes no change in the maximum volume of vehicle traffic to private inholdings in Kantishna. The limit specified in the 1997 *Entrance Area and Road Corridor Development Concept Plan* of 1,360 vehicles per season continues to apply to the combined total of vehicles authorized by ANILCA 1110(b) and concession contract vehicles.

In the absence of such a statement, the result of the plan could potentially be a large escalation of total traffic to Kantishna if day tours are suddenly not a part of the 1,360 calculation. We also note that there are still

undeveloped parcels in Kantishna, and that an overall limit on vehicle volume is crucial to prevent a new development from potentially destabilizing the road management system.

In addition, we are perplexed that the NPS did not choose to limit Kantishna day tours as in Alternative B. We continue to support the limit of 4 per day. We do not support the elimination of the Kantishna Experience to provide more day tours to lodge inholdings – that seems to compel park visitors who wish to have a tour to Kantishna to spend money at private businesses that are only coincidentally located within the park. Visitors deserve a least-cost option for access to Kantishna just as in other parts of the park.

As a final note, we were very disappointed with the Response to Comments section. In the past, NPS has provided thorough responses to comments that enabled us to understand how our comments were addressed in the planning documents. In this document, many of our comments were not addressed at all, and those that were specifically quoted were lumped with others that were often unrelated, and the responses given were inevitably irrelevant or meaningless, simply asserting the NPS position. We hope that this is not the template for future NPS documents, as it does not seem to meet the NEPA requirement for addressing substantive comments. It is also very discouraging to those who spend a lot of time trying to productively engage with the planning process and provide helpful feedback.

We do appreciate the extensive work NPS has completed to better understand the dynamics of the park road system, the challenge you face in accommodating visitors while still protecting the park road experience, and the opportunity you provide for DCC and others to participate.

Sincerely,

/s/ Nancy Bale
Charlie Loeb
Hannah Ragland

DCC Board of Directors

cc. Miriam Valentine
Philip Hooge

Errata, requests, clarifications

- 1) **The Preferred Alternative continues to discuss the vehicle limits within the context of the GMP Allocation Season (e.g. p.56 of the Final Plan).** It is unclear why the allocation season is still important if daily limits are used instead of a seasonal limit, although we can see an argument for having lower daily limits in the shoulder seasons. The “GMP Allocation Season” is an artifact of previous planning and regulatory efforts, and we suggest letting it go in favor of various daily limits.
- 2) **NPS should not eliminate camper buses through this plan.** While we generally support the plan objective to make space available for hikers, backpackers, and campers on all buses, the camper buses are strongly supported by DCC members, and there appear to be situations where they are indispensable, for example transporting campers with large amounts of gear to and from Wonder Lake Campground. The morning overnight camper buses traveling east often use all or most of their capacity for gear and people. Because backcountry users and visitors staying at Igloo and Sanctuary Campgrounds can't make overnight arrangements until they reach the park, having dedicated camper buses is essential to ensure seats are available for the nights when they have permits to stay in the park. Camper buses often provide essential empty seats to pick up hikers, obviating the need to send completely empty buses into the park for the same purpose. Camper buses operate at lower cost for backpackers, and the EIS does not discuss the impact of including these users in the same fee schedule as other visitors. Finally, elimination of camper buses depends on having reliable means of storing gear externally, but to our knowledge no such system has yet been identified. Eliminating camper buses is certainly premature until NPS has at least solved the problems of transporting high numbers of campers from campgrounds and providing acceptable external storage.
- 3) **The ROD should clarify that references to Alaska Geographic sales at the Toklat Rest Stop (page 108, 256, 258, 262) or to a “Toklat Rest Stop Visitor Center” (page 152) are outside of Denali’s stated management objectives, were inappropriately mentioned within this vehicle management plan, and would require new compliance if they are to remain.** Sales and other services currently provided at the Toklat Rest Area are not approved by any management plan, and are currently allowed only under an administrative decision. The Finding of No Significant Impact for the Environmental Assessment on “Construction of a New Eielson Visitor Center and a Permanent Toklat Rest Stop” specifically states that “the permanent facilities at the Toklat Rest Stop will not include a bus dispatch office, interpretation office or structure for book sales.”
- 4) **The ROD should clarify language on p. 62 of Final EIS** that states “Visitors would continue to be able to drive their private vehicles to the Teklanika River Campground...” To “Visitors *with valid campground permits* would continue to be able...”
- 5) **The ROD should commit to protecting nighttime vehicle reductions** – The most significant results from the Road Capacity Study showed an effect of night time traffic on animal movements close to the park road. Any exemptions to the nighttime traffic standard to study the effects of increased traffic should be matched by periods of equal length with decreased night time traffic. Comparing these results to each other and to data from previous years is the only way to affirm that an increase does not have unacceptable impacts to wildlife.

- 6) **Clarification of standards language.**
 - a) NPS should clarify that the standards for “number of vehicles at a wildlife stop” would include vehicles stopped to look at scenery.
 - b) NPS should apply a standard for number of vehicles parked at Polychrome Overlook and on Stony Hill.
 - c) To help make the standards clear, the ROD should be accompanied by a map showing those milepost locations along the park road that were identified in developing standards.

- 7) **The ROD should explain why the dust palliative monitoring program was deleted under “Actions Common to all Action Alternatives” and is no longer mentioned in the Final EIS.** The Draft VMP stated: “The Calcium Chloride (CaCl₂) dust palliative monitoring program would continue to ensure any effects from CaCl₂ application are identified early to avoid impacts to soils, water resources, and vegetation.” This monitoring program should not be removed.

- 8) **The ROD should maintain language to address the plan’s goal of making the transportation system understandable and user friendly.** The Draft EIS stated (under “Actions Common to all Action Alternatives”): “...options used to provide information about the activities and services offered in the park, so that visitors can make informed decisions about their park experience, would be addressed through the concession contract and ongoing park operations.” This is deleted in the Final VMP without explanation or discussion in response to comments. The ROD should commit NPS to ensuring the balanced and equitable marketing and booking of all park transportation and tour options.

- 9) **Clearly state that GPS units will be required for all vehicles traveling on the restricted portion of the Park Road.** If NPS is to depend on the GPS data for so many of its standards, it must require GPS units on all vehicles. In the Final Plan, GPS use was to be voluntary for some vehicles.

Attachment: Quotes from the DCC Comment Letter on the Draft Vehicle Management Plan and EIS

p.8

The 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 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.

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.

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.

p.14

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 concessionaire, 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.

p.12

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.