

March 1, 2010

To the Planning Team,

On behalf of the board and members of the Denali Citizens Council, thank you for the opportunity to provide comments during continued public scoping on the proposed Denali Park Vehicle Management Plan. Thank you for the time and energy you have put forward already with the Road Capacity Study and the Road Planning Workbook. We are glad that you have decided to increase the amount of time developing alternatives for this plan, and we plan to remain involved at key points along the way. As you know, the membership of DCC includes many citizens who have lived and/or worked at Denali for decades and have historic perspectives worth hearing. We've noticed that our communications network has been busier than usual over this issue, and hope that you are receiving a flood of ideas and opinions. Our comments below are loosely organized under main headings.

### **Purpose and Need**

We ask that as soon as possible, NPS put forward a draft Purpose and Need statement for this Vehicle Management Plan. Because the plan is intended to be a new GMP amendment, something that was not anticipated in 1997, when the Final Entrance Area and Road Corridor DCP/EIS was published (and supposed to cover the next 15-20 years), NPS must prove that an actual GMP amendment is needed.

The *Message from the Superintendent* at the beginning of the Planning Workbook gives a hint at the purpose – “determining the true carrying capacity of the Park Road.” The context for this need is the fact that “the park is approaching the core season vehicle limit of 10,512 set by park managers in the 1986 General Management Plan.” Please provide proof of this using a table showing the increases over the years since 1980, and a simple projection of assumed continued need. We are aware that currently some aspects of demand are not even included in the 10,512 allocation, such as DNHT, so its role in pushing road capacity should be explicated in the P and N statement.

---

#### DCC Board

Nancy Bale  
Anne Beaulaurier  
Jean Balay  
Cass Ray

Charlie Loeb  
Nan Eagleson  
Jared Zimmerman  
Hannah Ragland

Julia Potter, Community Organizer

If determining the true carrying capacity of the Park Road is in fact the sole purpose of this plan, it can be offered as an EIS-level implementation or amendment of the 1997 DCP, not as a new GMP amendment.

Why? –

1. The 1997 EIS was intended to provide policy guidelines for decades of road management. It had a strong tone of resource preservation and a strong definition of road character. Its Purpose and Need and Management Objectives sections were comprehensive. Why should this entire policy wheel be re-invented or re-stated? Attempting to do so could dilute policy and management guidelines that are already in place and provide confusing duplication.
2. Capacity determination was already mandated in the 1997 EIS. On page 37 of the Executive Summary, the plan states “The National Park Service is currently developing a visitor experience and resource protection (VERP) program for addressing carry capacity...Denali National Park is under increasing pressure to accommodate more and more visitors while still providing a quality experience and protecting park resources...Specific desired conditions and key impact indicators still must be identified and desired conditions must be compared to existing conditions. Adopting this approach to carrying capacity will also require the park staff to establish monitoring and evaluation procedures to ensure that acceptable resource and social conditions are achieved and maintained.” Thus, the 1997 Plan is the logical precursor to this plan and should be considered as such.

If however you decide to move forward with a new GMP amendment, you must be very concise and detailed as to what language and policy from the 1997 DCP/EIS you are retaining and what you are changing.

### **What the Vehicle Management Plan will accomplish**

On page 9 of the Workbook appears the following statement: “The plan will establish the vision, goals, objectives and strategies for managing vehicles along the Denali Park Road, including user capacity, in order to best manage demand while preserving visitor experiences and park resources and values.” This sentence is unclear and could be misinterpreted. Better to finish the sentence with the phrase “...in order to best manage demand while preserving park resources and values.” Visitor experience is not, in our view, a **primary** park value, and instead the park must concentrate more centrally on preserving resources and

managing demand to provide the foundation for a national park experience. This type of experience is not based on comfort, good food, even glossy books or narrated mini-tours. It really must be centrally based upon protecting the resource and managing the access.

### **Why Denali was established as a National Park**

Pages 2 and 3 of the 1997 DCP/EIS executive summary and on pages 7 – 9 of the Draft 1997 EIS itself is adequate language delineating park purpose. Using this language is preferable to what is offered in the Workbook. On page 6 of the Workbook, “Visitor enjoyment and inspiration from observing wildlife in its natural habitat and other natural features” is listed as a fundamental resource. We feel, instead, that this is a derivative and not a fundamental resource or value for Denali. Under the heading of other important resources and values are listed “Scientific research, education and interpretation about natural ecosystems and geologic features and processes.” Although important activities, these are not primary resources in the same way that wildlife and wildlife habitat, scenic and geologic values, and wilderness recreation opportunities are. Let’s keep the resources very clearly and simply defined and prioritized.

We are concerned, in general, that NPS could become so focused on providing a quality experience at Denali that the energy to protect fundamental resources and wilderness character could be dissipated. When it comes to traveling along the Park Road, people are able to enjoy the sights and sounds without an abundance of interpretive intervention. Spending resources on tour planning, preparation and implementation while letting inexpensive public transportation languish – this is a real danger in an “interpretive-centered” park transportation system. We do not oppose tours and understand that there are those for whom this is a desideratum, but the needs of the general public for inexpensive access (especially locals and Alaskans who want to enjoy their park) must be placed in the right perspective. The visitor center and book store at the entrance to Denali were designed to provide simple guides and information so that a visitor can hop onto a Transit bus and enjoy himself, even if the driver never says a word. I have been in shuttle buses where the camaraderie and esprit were very enjoyable without additional interpretation.

### **Vision of Vehicle Management Plan**

The vision statement on page 12 of the Workbook is adequate except for one point. It should strongly state the fact that the wilderness through which this road travels is actually Wilderness, designated by ANILCA and to be managed under Wilderness Act guidelines. In particular, Wilderness requires a minimum of infrastructure, noise and non-natural influences. Although the road travels through a Wilderness exclusion zone that creates a 300 foot wide corridor, and rest stops are located in exclusions, the impact of activities in

these exclusions upon the character of the Wilderness nearby must be considered and acknowledged in the Vision (and for that matter in the plan).

### **Proposed changes in Management Zoning**

We cautiously support the concept of Wildlife Viewing Subzone 3 as an attempt to manage and limit access along the more primitive section of the Park Road between Eielson and Wonder Lake. However, why does Wildlife Viewing Subzone 2 return between Wonder Lake junction and the park boundary? Is it because Kantishna lodges with access to the Wonder Lake area will cause increased traffic in that limited section?

There is no information in the Workbook about the purple section of the Park Road between the Old Park boundary and Kantishna, entitle Special Use Area. We request an explanation.

### **Goals and Objectives for Vehicle Management**

*Goal 2: Ensure a transportation system that provides the park's interpretive themes and messages to all visitors as a means to encourage public understanding and support of park resources and values.*

Requiring that ALL visitors receive interpretive themes will make the system more expensive and less available to visitors with less money.

*Goal 2: Provide a bus environment that enables visitors to engage with the park resources and values in a meaningful way.*

This does not mesh particularly well with *Goal 5: Optimize existing seating capacity within system design.* It is our opinion that a 52 seat bus is just not comfortable and that seating should be limited to 46-48 seats, in order for a bus environment that enables visitors to engage in a meaningful way.

### **Indicators and adaptive management**

Although, in theory, managing adaptively using indicators and standards is elegant and more legally and scientifically defensible than setting hard limits, it has several disadvantages.

1. It requires a complex system of monitoring and adjusting, something that will surely be very expensive and subject to breakdown.
2. It relies on the assumption that easily measurable indicators for EVERY resource and social condition are available, something that is especially difficult for some variables like Wilderness character.
3. It operates in a moving landscape of limited predictability, unless all drivers obey the rules and all animal stops are of a certain length.

Most of the listed indicators **could** provide some productive information regarding road capacity and visitor satisfaction. Monitoring of vehicles at a wildlife stop or in the viewscape or rest area would not be too difficult. Providing gaps in traffic for sheep may not be a necessity year round, however traffic gaps have their own plus points, as they space traffic and limit dust. The indicator for natural resource condition is vague and could be based on some of the collaring data, data that is expensive to gather and would only be gathered occasionally.

The social indicators of visitor satisfaction, delivery of park themes and wait time for hikers are not in the same league with indicators of park resource health. A scenario exists in which visitors could be satisfied with the predictability and wait time, but park resources are suffering. As before, delivery of key messages and themes is not a measure of the health of park resources, and is a secondary type of indicator. Visitor satisfaction is a complex state and requires complex questions and evaluations before we would be comfortable with it as a key indicator of a national park experience. In our minds, a national park experience could be challenging, uncomfortable and difficult, but still inspiring and memorable.

Truly, it is difficult to think of indicators that would be adequate to measure all the values the park holds. Here are a few additional suggestions - *dust quantity and extent, buildings in the viewscape, number of times a bus is passed by other busses going in the opposite direction, sounds of busses in the distance and when at rest stops, number of busses in viewscape of hikers within sight of road, affect of road on hikers' sense of solitude*. Another important indicator would be *periodic measures at key locations along the road of structural integrity of the cross section*.

### **Concepts**

**All concepts:** Transit should have the opportunity to stop at Teklanika.

**All concepts:** A local area transportation system with services to McKinley Village and Nenana Canyon was mandated in the 1997 DCP and is still needed.

**All concepts:** Hourly limits appear to be a reasonable approach, based on computer modeling performed during development of alternatives.

**Concept A: Existing condition** – The existing transportation system has some flaws, and its allocation conflicts were one reason that this process began. However, the existing condition has one advantage. Existing infrastructure has grown up around this system and rest stops are designed for it. Changes in destinations and types of tours will have fairly unknown impacts on existing infrastructure. This could potentially be modeled using technology developed under the Road Capacity Study. Another inconsistency

of the existing system is the growth of the DNHT as a Specialized Tour that works outside the 10,512 allocation. If existing condition is retained, numbers of DNHT would need to be reduced.

**Management Concept B: Diversity** – Too difficult to sell, confusing, economy tour is unnecessary. However, this concept brings up some interesting ideas, including lengthening DNHT (A Specialized Tour) to Teklanika and continuing the Kantishna Experience (A Specialized Tour). These tours involve a fair amount of time outside the bus, in contrast to the Tundra Wilderness Tour type of Premium Tour, which is mainly a sedentary viewing experience. Having such a tour makes some sense.

**Management Concept C: Key destinations:** This concept combines specialized tours with premium tours and visits all park road destinations. Eliminates Specialized Tours except for a single tour in the entrance area.

**Management Concept D: One Bus:** This concept is too problematic and could limit access to the independent user in years of high managed tourism uses.

**Suggestion: A Combined Concept (Concept B with some changes)**

1. **No economy tour**, this is not needed and adds too much complexity and confusion in booking, training and scheduling.
2. **Premium Tour**, with Eielson available to a few busses, dependent on monitoring of impacts (likely less than 1/3 of total Premium Tour busses). Stony could still be available to a few Toklat busses, but going to Stony would require daily limits to protect the already damaged resource there. Assume that busses going to Eielson might (probably would) stop at Stony. **No Premium Tour** to Wonder Lake or Kantishna.
3. **Transit to all available destinations.** Develop a rubric for adjusting proportions of Transit/Tour, and have a floor or minimum on transit daily numbers. A certain number of Transit seats would be bookable ahead (1/3?) Transit is sold as a true option, even for those who request a “tour.” Explore running Transit booking directly from NPS platform in addition to or instead of running it from concessioner platform. We recommend selling transit aggressively to Alaskans who feel they have been shut out of the system. Do not necessarily accept recent reduced Transit numbers as true reduction of demand. We hear Alaskans say that Denali is not their park until the lottery. Can that condition be turned around?

4. **Specialized Tour** – These would be relatively small in number and would provide more out of bus experience. Kantishna Experience would be limited to protect Wildlife Viewing Subzone 3. DNHT type tour could split its destinations, some to Teklanika, and some to Primrose. Although some have asked for a longer DNHT, transferring all DNHTs to Teklanika is untenable and unnecessary. DNHT type tours would probably have to be reduced in number to conform to limits and standards. With additional tour to Teklanika, the area would need to be built-out to the maximum extent allowed in the EA. A local entrance area tour could be offered as well, not in the allocation.
5. **Retain 10,512 past mile 15 (no exceptions)** during implementation of this system as a target number. Use hourly and daily limits to remain within indicators/standards. Develop more sophisticated limits through adaptive management. Do not abandon numerical limits!! Beginning any new management scenario without hard limits will be de-stabilizing, and has the potential to create unrealistic optimism within the managed tour industry. It was managed tourism that originally asked for an increase in their piece of the allocation pie, and they expect increased numbers from this process.
6. **Analyze existing system during next couple of summers** – Purpose would be to determine if current system violates indicators/standards. Design new system to remain within indicators/standards from day 1. Philosophy is that we start low and work up only if clearly under impact thresholds.
7. **This suggested Concept (B with modifications) can be deployed with only minor amendments to 1997 EIS.** Allocation between tour and transit will probably have to be amended. However, NPS MUST PROTECT inexpensive, no frills public access. It is an OBLIGATION. NPS must be very careful not to be overly draconian with professional photographer permits. Elimination of a prophoto permit and turning it into a bus is not at all impact neutral.

### **Managing access to Kantishna**

NPS must maintain legal access to inholdings but limit day tours to protect Wildlife Viewing Subzone 3. NPS must continue to seek ways to buy out additional private inholdings to prevent the additional development of private lodges with demands for access. NPS must itself not be part of the problem by adding tours and administrative presence in Kantishna. A separate EIS for Kantishna may be necessary to iron out all the access and development details.

### **Park Road Maintenance Standards – 2007**

We argue that these Maintenance Standards, because they were submitted to Categorical Exclusion and not vetted under full NEPA compliance, should be open to comment. We especially are concerned about the appropriateness of the Design Vehicle and the structural ability of the Park Road to handle current levels of traffic, let alone any increases that indicators/standards might allow. For this reason, we feel that the structural integrity of the Park Road must be a consideration in the establishment of any Vehicle Management Plan and indicators for the health of the road be taken as key factors in establishing limits.

In our opinion, the NPS is under no obligation to maximize road access into Denali National Park, but only to provide access that is consistent with park purposes and values. It must always be considered, from the outset, whether the existing condition is already damaging to resources and must be changed in some way, in order to protect park resources. We are excited that you have focused intently on designing a Vehicle Management System that examines all options with the goal of more accurately and completely protecting park resources. We urge you not to become too focused on interpretation and tour during this journey, but instead to concentrate on provision of access that is consistent with protection of Denali National Park's enduring values.

Sincerely,

A handwritten signature in black ink that reads "Nancy Bale". The signature is written in a cursive, flowing style.

Nancy Bale

DCC President, 907-277-3825