

October 15, 2008

Dear Ms. Valentine and the planning team,

On behalf of the board and members of Denali Citizens Council, the only grassroots organization exclusively focused on Denali National Park and its surrounding communities, thank you for the opportunity to provide ideas during the scoping process for the Denali Park Vehicle Management EIS. Changes in vehicle management at Denali, if not done carefully and with foresight, could profoundly reduce the status of Denali National Park as one of the crown jewels of the national park system. This one EIS could set in motion changes that would reverberate negatively for years. Or, the final plan could remove some of the current problems and encourage new thinking to meet the needs of tourism. We anticipate and will review the final conclusions of the Road Capacity Study, recently completed and due to be released in spring 2009. We and our members will actively follow the development of alternatives for the Vehicle Management EIS and hope to assist in encouraging a public dialogue regarding the future of Denali National Park's unique and famous road. Some scoping suggestions are listed below.

- **Alternative approaches and ideas for accomplishing project goals**

"The goal of the plan is to provide a high quality experience for visitors while protecting wilderness resource values, scenic values, wildlife, other park resources, and maintaining the unique character of the park road."

This is a laudable goal; in fact it is a general goal of the NPS. It can be accomplished within the current system and under the current regulations. The EIS establishing the current vehicle management system, the Entrance Area and Road Corridor EIS, is relatively recent, 1997. NPS has not yet shown adequate purpose and need to conduct another EIS level reorganization of the vehicle transportation system at Denali. In any case, the Denali Citizens Council does not favor raising the 10,512 vehicle cap, currently in federal regulation. This number may already be high, when you consider additional vehicle access now outside the caps, including Denali Natural History Tour and traffic during the shoulder season. Although "Tour" is now said to be at capacity, solutions could involve a variety of initiatives that do not increase net traffic on the park road, and that may, in fact, reduce it.

We would welcome a creative discussion of changes that could meet the needs of tourism while maintaining and enhancing a public access shuttle at Denali. To accomplish this, under current caps, NPS could:

- a. Re-examine Tour packaging and selling, to provide a more flexible approach to how the park road is used. If tourism providers give visitors more transportation or tourism choices, many folks would select shorter bus trips or an entrance area – based excursion. This could reduce traffic pressure (and attendant effects on resources) while providing a high quality experience for visitors with no change in bus numbers (or even a reduction).

DCC Board

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- b. Make Shuttle more visible by providing adequate access to the Wilderness Access Center from local tourism venues using a community transportation system developed through consultation between NPS, local businesses and experts in the field. Currently, Shuttle is represented as “underutilized” but in fact it is not made as available to park visitors as Tour, which picks up guests at their hotels and aggressively advertises and books the Tour product.
- c. Give the public Shuttle system adequate exposure through detailed explanation of the system. Most people, when calling the park, may ask for a tour (in a generic way) when in fact they would be perfectly satisfied with a Shuttle experience. Those who communicate with the public should be trained to explain both systems thoroughly.
- d. Enhance NPS interpreter presence on the public Shuttle. A ranger could actually spend time on up to three Shuttle buses in one day by starting at the entrance on one bus, then getting onto another bus (or two) while out in the park. Or, an interpretive ranger could spend some time interpreting on a Shuttle, take a discovery hike, and then get onto another Shuttle for the trip home.

If in fact NPS decides to continue with an EIS level plan on Vehicle Management for Denali, we intend to participate and provide additional suggestions for providing vehicle access while protecting park resources. We urge NPS to keep in mind that it is not a park purpose to maximize visitor access, but rather to provide access that protects resources and wilderness character.

- **The range of environmental and socioeconomic issues that need to be considered**

The Road Capacity Study **did not cover the full range of resources that NPS has pledged to protect in the Vehicle Management EIS.** The affects of park road traffic upon wildlife movements is the key resource protection metric in the Road Capacity Study. Other resource values are considered only through the lens of “visitor experience.” The results of the Road Capacity Study will be helpful but should not be used as the only or even the most important determinant of whether or not traffic on the park road can be increased.

NPS must address resource values identified in plan goals but not extensively considered in the Road Capacity Study. These other resource values include

- a. Wilderness resource values. Wilderness character requires protection. NPS must address the fact that, although there is a Wilderness exclusion adjacent to the park road, the road essentially travels through designated Wilderness. Simply because plan changes would occur within a *Wilderness exclusion*, their impacts beyond that exclusion must be considered. Three key Wilderness values that are subject to degradation by activities within the road corridor include;
 - Natural soundscape. Desired future conditions have been set for the natural sound environment in the Wilderness core of Denali National Park. Any plan that would consider changing vehicle management at Denali must consider if current soundscape standards are being met and how any changes in vehicle numbers or allocations would affect those standards.
 - An unimpaired viewscape, and
 - The sense of solitude a backcountry visitor within view of the road has the right to expect.

NPS must describe in this plan how these values will remain unimpaired under any scheme of changes within the road corridor. In fact, the plan ought to consider if any of these values are impaired now.

- b. “Road character” as defined in Appendix C of the Entrance Area and Road Corridor EIS (1997). Two elements of this definition are important – maintaining the road’s simple outlines and protecting the simplicity of its surroundings. Even if the Road Capacity Study finds that some increases can be made, the NPS is required to look at cumulative impacts to road character in relation to such increases. Ultimately, more traffic will lead to road widening and more roadside amenities. Denali Citizens Council is concerned that such changes would, in turn, diminish road character. NPS could protect the increasingly primitive character of the road as one moves west by progressively reducing traffic allocations for each segment of the road west of Teklanika, for example Teklanika to Toklat, Toklat to Eielson, Eielson and Wonder Lake.

Other environmental effects to be considered include:

- a. Carbon footprint of vehicle transportation. All new plans must promote use of low sulfur diesel, fuel economy, developing hybrid fleet (a soundscape benefit also), etc.
- b. Effects on overall health of living resources in addition to simply the movements of wildlife. Traffic on the park road may have cumulative effects on the overall health of the park ecosystem, effects that are only partially measured by the movements of animals. These effects, although they may be difficult to measure, require consideration.
- c. Water quality. Fugitive dust, erosion and particulate emissions, oil spills and other effects of transportation systems can affect water quality and other environmental health parameters.
- d. Invasive plants...increased traffic would promote invasive plant movement farther along the park road. This should be addressed.

Socioeconomic effects to be considered include:

- a. Management of vehicle transportation at Denali National Park
The concessioner handles reservations, marketing, driver training, scheduling and oversight of the Tundra Wildlife Tour, the Denali Natural History Tour, the Public Shuttle and other transportation venues in the entrance area of the park. Data appear to show that Tour products are overbooked or in danger of same and that the Public Shuttle is experiencing declines in use. In addition, we are told that Tour products are subsidizing the Shuttle. Given these data, some have suggested that NPS change the allocation between Tour and Shuttle, providing more numbers of buses to Tour.

However, arguments for changes in allocation must be carefully considered. Perhaps the importance of Shuttle has been understated and undervalued. Perhaps NPS should think creatively about how to manage this system so that the Public Shuttle is preserved, even enhanced. One possibility - NPS or a nonprofit could take over management of the Public Shuttle and coordinate it with a local transportation system that would provide service to tourism businesses and homes within a few miles of the park entrance. This form of management would improve the visibility, efficiency and public purpose of the shuttle system, making it more accessible to a diversity of users. Community transportation to connect with the park shuttle would also help to reduce the impact of private car parking on the existing lots in the entrance area. With NPS or nonprofit management the Shuttle’s purpose would not need to be governed by its status on the balance sheet. Under a nonprofit type of management, the only mandate would be to operate in the black and provide a public service. The two systems would book and market separately. The systems would work together to coordinate vehicle safety, maintenance, driver training, and scheduling. The concessioner could continue to market, book and operate Tour.

Because Denali is a public park with no private access except to Kantishna inholders, the importance of a shuttle system and maintenance of opportunities for access into Denali Park for the general public, including local residents, campers, and non-package tour guests cannot be overstated. The making of profit on a Tour product is a concession. The providing of access is an essential park purpose.

- **Other potential projects that might affect or be affected by this project**

Although this plan does not consider infrastructure projects such as rest stops, their relationship to traffic amount and flow is undeniable (For example, staffing and inventory transport to a visitor center or commercial enterprise will place more vehicles on the road). Road maintenance projects (such as plans to install additional pullouts west of Eielson) are also related to traffic amount and flow. How will NPS coordinate infrastructure and maintenance planning (now in separate, differently time-lined documents) with this Vehicle Management process? They are more logically bundled into the entire plan, as occurred in the Entrance Area and Road Corridor EIS of 1997.

Development of a commercial facility at the Toklat Rest Stop will tend to promote traffic allocation and visitor uses that are inappropriate for that part of Denali National Park and Preserve. DCC continues to oppose the siting of a “temporary” commercial facility at Toklat Rest Stop because it is in conflict with park purpose for the area, set down in an EA (2004) and an EIS (1997).

The new multi million dollar facility at Eielson will act as a draw to additional Tour, despite NPS assertions that it was being built only with the current level of use in mind.

- **Information that needs to be considered (such as related research) and why it should be included**

- a. Park advocates often state that increased access to National Parks creates more park advocates. However, the relationship between increased access and increased advocacy for “the national park ideal” is not well established. Any plan that could result in increased traffic must consider and address this unknown relationship.
- a. Drivers and others who have worked inside Denali National Park for years and have historic observations regarding quantitative and qualitative indicators of the health of Denali Park’s resources should not only be accepted into the dialogue, they should be actively recruited. Their memories could be utilized in ways similar to the way NPS used the memories of Cantwell residents to help determine use of ORVs for subsistence activities. This type of data must be analyzed using different methods from those used in the Road Capacity Study, but careful analysis can yield helpful conclusions.
- b. Meta-analysis of past scientific studies of impacts of the park road on wildlife must be performed. Even with the limitations of past studies, there is important data in them.
- c. Historic perspectives, including the Adolph Murie vision for the road, must be considered as they contribute to the road character definition and the importance to park purpose of maintaining road character.
- d. The Road Capacity Study final findings will not be available until spring 2009, we are told. Because these findings will provide information for development of alternatives in the Vehicle Management Plan, the release of draft alternatives ought to be delayed to give NPS and the public time to review these findings and weigh their importance.

- The Road Capacity Study, as a VERP process, is intended to provide an objective, scientific look at the carrying capacity of the Denali Park Road. We appreciate this effort and we find the preliminary data interesting in many ways.
 - However, the Road Capacity Study is not comprehensive. It does not consider **all variables in play** to determine the “carrying capacity” of a national park road. Additional variables include: road character, natural soundscape, wilderness character and other philosophical considerations related to national park purposes. These and other variables could suggest that increases in traffic numbers should not occur, even if the Road Capacity Study indicates that they *could* occur.
 - The number of visitor surveys conducted under the Road Capacity Study was a small portion of total summer visitors. The validity of this data could be questioned, especially if selection did not adequately include all categories of visitors, including local users.
 - Overall, although we expect the Road Capacity Study to be useful we expect that it will be one of several tools to be used to help NPS develop a Vehicle Management Plan.
- **Your concerns about conditions or activities in the park (related to the planning project) and suggestions for improvement**
 - a. Inholder day tours to Kantishna should be specifically capped. We have long argued that these are not an ANILCA Section 1110 guarantee. Traffic flow to Kantishna must be limited, or Kantishna’s rural character will be damaged, and desired future conditions under Backcountry Plan management indicators will be impaired. ANILCA access guarantees are subject to “reasonable regulation to protect park resources.”
 - b. The Entrance Area and Road Corridor EIS (1997), states, (p. 270, Draft) “The road is currently subject to a traffic load that considerably exceeds its structural capacity.” Although a number of drainage and structural corrections have been made since 1997, the public has little idea of the true structural capacity of this road. Under “affected environment” the plan should present data regarding the capacity of the park road to accept current and future bus loads. Data regarding repetitive stress as a factor in ultimate failure of this road should be presented.
 - c. The specifications of the design vehicle are not under question in this plan. However we have long questioned the size and design of some vehicles on the park road and urge NPS to consider engineering data regarding the structural capacity of the park road in development of a sensible design vehicle.
 - d. Professional photographers have lost a number of permit privileges in Denali National Park over the years. We urge NPS to consider their traditional role in park interpretation and in developing park advocacy through photography. In addition, we argue that replacing a single photographer vehicle with a 52 passenger bus is not *impact neutral*, since buses bring with them greater impacts to road character and visitor experience. The argument that it is preferable to provide more access to more people (through conversion of photographer permits to bus permits) must be tempered by consideration of the cumulative impacts of that shift to park resources.