Correspondence ID: 1 **Project:** 22494 **Document:** 42309
Received: Aug,03,2011 10:08:18
Correspondence Type: Web Form
Correspondence: If Alternative C includes language that allows the superintendent to choose vehicle numbers on the road, I prefer Alternative A that guarantees the public some access. Otherwise, my preference is Alternative C.

Correspondence ID: 2 **Project:** 22494 **Document:** 42309
Received: Aug,04,2011 18:27:43
Correspondence Type: Web Form
Correspondence: I do not think your range of alternatives provided enough scope. I believe there should have been an alternative that looked at the possibility of reducing the number of vehicles. The Denali Park road is so busy that it keeps many people away from the park. Because of this, people who think there already too much traffic, including myself, were greatly underrepresented in your surveys. Less is often better.

- Denali NPP lover

Correspondence ID: 3 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,05,2011 18:06:43
Correspondence Type: Web Form
Correspondence: The NEPA "environmentally preferable alternative", on page 73, states that:

"However, both alternatives B and C would provide environmental benefits compared to alternative A through the implementation of monitoring and adaptive strategies for managing vehicle use and protecting wildlife, wilderness values, and other park resources. Unlike alternative A, alternatives B and C would incorporate a formal program of indicators, standards, and adaptive management strategies for the protection and preservation of desired conditions for natural resources. For example, under both of these alternatives, sheep gap spacing would be monitored to minimize impacts on Dall sheep, nighttime traffic would be monitored to minimize disturbances to wildlife, and studies would be used to monitor and assess natural resource conditions. Based on the results of the monitoring, management actions could then be taken to ensure that standards are met. This formal program would provide better long-term protection and preservation of natural resources when compared to alternative A."

This implies that the monitoring and adaptive strategies are exclusive and not do-able for "Alternative A". The document does not make it clear nor make a case for why the improved implementation strategies could not be applied to a version of the access plan that is not significantly altered from the "No Action" version.

The study discounts any version of the "No Action" alternative that would merely include these improved monitoring and adaptive strategies. In that case, the revised "Alternative A" would not have the additional vehicle impact but would have the improvement due to the strategies - thereby making "Alternative A" clearly more environmentally preferable than the two changed "B" and "C" alternatives. I believe the document has missed an additional and reasonable alternative.

Correspondence ID: 4 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,06,2011 15:50:42
Correspondence Type: Web Form
Correspondence: Comments on Denali Draft Vehicle Management Plan

I am an animal ecologist and wildlife photographer based in Vancouver, British Columbia. I spent five weeks in Denali National Park in August/September 2010 primarily riding the buses and occasionally accompanying another photographer with a pro-photographer permit to use his own vehicle. In 2011, I was invited to participate in a series of conference calls with Denali park staff and several other photographers, convened so that we as photographers could provide input to the park on the future of the pro-photographer permitting system. My comments are based on these various experiences.

1. Comments on Proposed Alternatives Related to Pro-Photography Permits

First, I am extremely dismayed to find that the Draft Vehicle Management Plan as presented does not incorporate or reflect in any way whatsoever the carefully considered

feedback that was provided by the photographers during the above mentioned photography consultation process. This not only dismays but also surprises me: during the consultation process itself, I felt that a good rapport was established between the photographers and the park personnel involved, that both parties had clearly expressed their concerns and that that those concerns had been mutually heard and acknowledged. I was also pleased at the positive reception the park staff gave both to the photographers' offer to give something back to the park (images, blog entries, public presentations etc.) in exchange for pro-pho access and to the photographers' invitation to the park staff to come up with additional suggestions for ways we could be of use to the park

Despite what appeared to be the good progress made in this consultation process, the proposals concerning professional photographers in Alternatives B and C in the draft plan entirely ignore the photographers' stated concerns and do not take into account the time, patience and waiting that is required for successful nature photography in general and wildlife photography in particular.

Alternative B states that, "Two private vehicle permits would be allowed each day and managed for two distinct areas: Savage River to Toklat and Toklat to Wonder Lake." Aside from the fact that this significantly reduces the number of pro-pho permits from the existing number as specified in Alternative A, it also prevents those who are issued permits from accessing the whole park road. I cannot image any professional photographer investing the time and expense to obtain a permit and get all the way up to Denali only to access one portion of the park. What if the animals you are photographing, say a wolf pack chasing a moose, cross into the area you are not permitted to access? Are you then just supposed to give up on this rare opportunity because of an arbitrary permit boundary? And what if the vehicle permitted for the western part of the park runs low on gas? Is that photographer prohibited from passing through the other section in order to get to town to refuel? This proposal does not seem workable to me in any practical way and it does not in any way respect the requirements of professional wildlife photographers. Nor does it respect the requirements of landscape photographers who would be prevented from accessing the full range of the scenic wonders of the park. Even if the permit holders were allowed access to one part of the park for part of their stay and the remainder of the park for the other part of their stay, that still imposes serious limitations, if, for just one example, Mount Denali were visible only on the day(s) a photographer was denied access to Wonder Lake.

Alternative C states that, "Up to three permits a day would be available for the entire road, during the shoulder seasons that occur from Memorial Day weekend to approximately June 10th, and approximately August 25th to the end of the season. During the peak season (approximately June 10th to August 25th), up to one permit per day will be issued for the entire Park Road." While this is an improvement over Alternative B, it still represents a significant reduction over existing permit allowances under Alternative A.

In the photography consultation process described above, the photographers urged that seven permits be issued per day for the entire road during each of the shoulder seasons and no permits (or possibly a single permit) be issued during the peak summer season. This would reduce pressure from photographers during the time when visitation rates are highest and so the need for maximum number of buses on the road is greatest. And it would allow photographers access to the park during key times when young animals and wildflowers are present in spring and when fall colour and ungulate rut activity peak in autumn. I support an allocation of seven pro-permits for the entire park road during shoulder seasons and no or one permit during the peak season. Failing that, I support Alternative A's proposal for a continuation of the current allocation of five pro-pho permits throughout the entire season. I do not support Alternatives B or C with respect to proposed pro-pho permit numbers.

Alternative C goes on to states that, "At no time may two or more professional photographer/commercial filming vehicles be stopped at the same location if standards would be exceeded." This restriction poses significant practical issues in terms of implementation, as I understand it. Does this mean that if two or more photographers who got up before dawn to wait for a sleeping wolf to become visible were then joined by a certain number of buses, that one of the photographers would be forced to leave the area, thus not obtaining the image they waited so long for? And who would determine which photographer would have to leave the area? Maybe both arrived at the same time, so first on the scene would not be a useful criterion. And does this mean that photographers have to take their eye from the viewfinder (thereby possibly missing their shot) to keep track of how many vehicles have arrived? How far away does the photographer have to move from the area when these buses arrive? Can he/she move a short distance away and then return to wait for the wolf when some of the buses have moved on? This restriction seems impractically unworkable to me and runs counter to the interests and requirements of serious photography. (To level the playing field, perhaps buses should be prohibited from stopping to view wildlife when pro-pho vehicles are already present.)

Alternatives B and C both state that, "During periods of high traffic volume (i.e., defined as days or periods of days when non-system use would displace buses), permit holders may be required to use the transit system to avoid displacement of visitor opportunities and administrative functions." This restriction is particularly objectionable! Requiring pro-pho permit holders to use the transit system totally negates the point and purpose of having a pro-pho permit in the first place. If I go to the time and expense of obtaining a permit to access the park at my own pace using my own vehicle and then am denied such access, why would I even bother applying for a permit? And how would this restriction be implemented? Would I be informed that I would have to ride the bus before I went to the trouble of getting all the way to Denali or would I be informed of that only once I arrived? Would I be allowed to use my vehicle one day when visitation was low due to poor weather but have to ride the bus the next day? And if that were the case, how and by whom would I be informed of when I need to ride the bus and when I could use my own vehicle? Again, this restriction seems unworkably

impractical as I understand it. And it is totally and entirely counter to the interests and requirements of serious photography.

Serious wildlife photography often and generally requires patience and waiting for extended periods for the animal to move into a good position for proper lighting and a pleasing background/foreground and/or to exhibit natural and interesting behaviours. The compelling images that have helped to make Denali so famous as a wildlife destination cannot reliably be obtained if a photographer is required to move on as soon as a certain number of vehicles appear, to ride a bus that has to meet strict schedules or to access only one section of the park road.

During the photography consultation process, some park staff voiced the opinion that enough images already exist to fulfill the foreseeable image needs of the park for future publications and displays. However, as image quality continues to advance by leaps and bounds with the ongoing improvements in digital technology, older images will appear increasingly dated as their clarity and detail fail to measure up to images captured with newer cameras. As well, fresh images not seen before will aid in promoting the park message. Thus, I fully expect the park will continue to need new professional quality images for future use. Therefore, I believe it is in the interest of the park not to impose excessive restrictions on professional photographers under the pro-pho permit system. All of the photographers involved in the consultation process indicated a keen interest in establishing a win-win scenario, in which photographers would provide images and other services to the park in exchange for being allowed reasonable access that would adequately facilitate the interests and requirements of serious photography.

2. Comments on Proposed Alternatives Related to Bus Transit and Tours

With respect to bus service and tour offerings, I very strongly prefer Alternative A to either B or C.

First, relative to Alternative A, Alternatives B and C would increase vehicle impacts on wildlife during the morning and evening periods when many animals are most active. B and C would also increase vehicle impacts during the spring shoulder season when animals are especially vulnerable as they recover from winter and give birth. B and C would also increase vehicle impacts during the fall shoulder season when many ungulates enter rut. The draft plan says that these effects could be mitigated by use of indicators, standards and adaptive management. This implies that these effects would not be entirely negated by such measures. And it is unclear to me why mitigation of negative wildlife impacts using indicators, standards and adaptive management cannot also be implemented under Alternative A. Yet no mention of doing so is made in reference to Alternative A.

In many respect, Alternative B is the worst of the three options, in my opinion. Maximizing the numbers of visitors and minimizing empty seats on the buses would significantly reduce my visitor experience to the extent that I would be highly unlikely to return to Denali except with a pro-pass.

This alternative might suit those who plan to spend one day in Denali, but for people like me who intend to spend much more time than that, combining the economy self-guided tours with the transit function of the buses has huge drawbacks. First, the buses would be far more crowded which, as I describe in section 3 below, would negatively impact my visitor experience more than any other single factor. Second, if every bus had to start at the Visitor Center (which opens at 8 AM) where the tour passengers would receive an orientation, does that then mean an end to the 6 AM buses that now run? If so, then I would be unable to enter the park at all during times when the light is best and many animal species are most active. Third, in order to ensure a premium seat (important to me if I am going to be able to photograph from the bus), then I would be forced to pay extra each day to cover the costs of the self-guiding tour materials even though I would already have a copy of those materials from my previous trips into the park. This option would at the very least require an intermediate price point that would include a premium seat but not the tour materials.

Truthfully, I see no advantage whatsoever to the idea of an economy self-guiding tour, whether it is combined with the transit service as in Alternative B or kept separate as in Alternative C. Why not just offer for sale, separate from the price of a bus ticket, the brochures, iPods and other tour materials to those who want them? The only aspect of an economy tour that might entice me to pay more for my bus ticket would be actual interpretation by a particularly knowledgeable, qualified, live person.

According to the draft plan, limited bus space and discontinuation of camper buses under Alternative B would mean that backpacks would have to be accommodated on the exterior of the bus, but just how that would be accomplished is not specified. Since the park road is very dusty when dry and very muddy when wet, what sort of provisions would be made to ensure backpacks would be protected from excessive dirt and rain? And does this mean that my large camera pack with my 500 mm lens would have to be consigned to the exterior of the bus? Then for sure I would never return to Denali because not only would I expose my valuable optics to potential damage, I would also not have access to my camera to photograph the wildlife seen from the bus.

While overall I strongly prefer Alternative A to C, one aspect of the latter that may have some merit is the proposal for less vehicle traffic west of Eielson to Wonder Lake

as this would reduce wildlife impacts. However, I would be opposed to denying pro-photographer access to this section of the park. Wonder Lake is an iconic photographic location and the road in provides key sightings of moose, caribou, swans, beavers and other species.

Regardless of whatever alternative is ultimately selected, I support the proposal currently under Alternative B that "NPS employees would access duty stations on the restricted portions of the Park Road (Savage River to Wonder Lake) via an employee shuttle system. The transit system would be used by employee guests for access." This would be a gesture of good faith, demonstrating that park staff is doing its part to maximize visitor access to the park by minimizing staff contributions to seasonal vehicle limits.

3. Comments Related to Appendices C

A. Questions concerning survey procedures Appendix C states that, "For these surveys, visitor reactions were discerned to increasing numbers of vehicles. Visitors were shown a series of photos of the same scene with increasing numbers of buses and asked to score each photo from 4 (very acceptable) to -4 (very unacceptable). Social normative curves were fit to the results to identify visitor reactions to different crowding levels and provide guidance to park management in setting standards."

I question the accuracy of using a photograph as a means of assessing visitor response to actual bus density in the real world, on the ground. While this assessment method might be reasonably accurate for assessing the response to of visitors walking the road or hiking within sight of it, I would argue that this method has much less relevance to the experience of the bus-riding majority of park visitors If I am inside a bus watching an animal out the window and several other buses are lined up behind and in front of the bus I am on, I may not even be aware of exactly how many buses are present. First, I am probably absorbed in watching the animal. Second, especially if I am on a fairly straight section of road, I may not even be able to see all the buses that are there. My main concern is, am I getting a clear view of the animal I came to see and is it behaving normally despite the vehicles present? If I am and it is, then I really don't care how many buses are present.

On the other hand, if you showed me a photograph taken from outside the bus such that I could see a whole line of buses side-on or from overhead, then I would likely respond negatively to a relatively smaller number of buses because, in such photographs taken from such angles, I would be able to see and count all of the buses easily and because I would not be distracted from bus counting by watching a magnificent animal out the window. In a photograph, what appears to be a major traffic jam might be something that would not bother me from inside one of the buses that is part of that jam.

Second, if I understand them correctly, the standards for determining acceptable number of vehicles at a viewpoint or wildlife sighting appear to count all vehicles as equal, such that my Subaru Outback with engine turned off would be considered to have the same degree of negative impact on visitor experience as a tall, long, noisy, diesel-belching bus. Personally, I would find four cars far less intrusive than four buses ? or even than one bus - as their smaller size and relative silence do not impede my visual and auditory experience to nearly the same degree. This is relevant to the discussion above of pro-pho permits and the park objective of meeting standards of visitor experience. In assessing visitor response to numbers of vehicles present at a viewpoint or wildlife stop, was any distinction made between responses to different sorts of vehicles? If visitors respond less negatively to small cars than big buses, then perhaps some of the proposed restrictions on pro-phos (such as Alternative C's "At no time may two or more professional photographer/commercial filming vehicles be stopped at the same location if standards would be exceeded.") are unnecessarily strict. In other words, a mere count of vehicles may not be as useful and accurate a standard as one that takes into account the size of vehicles as well as their numbers.

For me personally, far more relevant to my visitor experience than number of vehicles present at a viewpoint or wildlife stop is the number of people on the same bus as me. Noisy people eating smelly tuna fish sandwiches and preventing me from getting to a window for an optimal view of wildlife on a crowded bus does far more to deteriorate my wilderness experience of Denali than seeing any number of other buses on the road. Hence my distaste for Alternative B as discussed above.

B. Question regarding an inconsistency Page 21 of Appendix C states that pro-photographers would be required to carry a GPS as a condition of their permit. On the other hand, in several places, including page 24, this appendix states that photographers would be issued a GPS on a voluntary basis. As a photographer, whether this would be obligatory or voluntary is of interest.

4. Summary Of the three alternatives as proposed in the draft plan, I strongly prefer Alternative A. Regardless of what alternative is ultimately selected, I strongly support a pro-photographer permit system that issues seven permits for the entire park road during the shoulder seasons and no or one permit during the peak season. I strongly oppose restrictions requiring photographers with a pro-pho permit to use the transit system during periods of high traffic volume; this would totally negate the purpose of the permit. I also oppose several additional proposed restrictions on pro-pho permit holders that run counter to and would preclude successful wildlife (and other) photography.

Received: Aug,07,2011 03:45:12
Correspondence Type: Web Form
Correspondence: I would like to see a program implemented that combines both pre-registered outings such as tours by major tourism operations as well as the spontaneous type that will take those who prefer to travel by their own schedule. I am a member of several RV internet forums and have been in the RV life for many years. One thing I have learned is that a great many people come to Alaska with no idea what to do, where to go, or what is available. Having strictly pre-registered formal tours would exclude them since they aren't part of any tour group. In addition, Denali National Park does not always "cooperate" weather-wise and a lot of folks leave Alaska disappointed that they didn't see the mountain or any wildlife. Having a spur of the moment tour program would allow for those days where our tourists would otherwise miss an opportunity to enjoy the Park more.

I have been to Denali National Park many times and sometimes I see the mountain and sometimes I don't. I have been on several bus trips into the Park and have seen a lot of wildlife, however, even I haven't seen everything (which is why I keep coming back!) I think we would get more visitors and more happy visitors if we made both formal and spontaneous tours available.

Correspondence ID: 6 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,07,2011 05:47:56
Correspondence Type: Web Form
Correspondence: I am a former resident of Alaska and have visited Denali Park on several occasions. The experience is one I would recommend to anyone visting Alaska. I did take the shorter of the bus rides. My suggestion would be to erect a people mover type train system. This would allow more cars and could still make stops along the way as they do with the bus system.

Correspondence ID: 7 **Project:** 22494 **Document:** 42309
Received: Aug,07,2011 07:57:15
Correspondence Type: Web Form
Correspondence: Having visited the park in 2010 and having taken the very enjoyable 12 hour tour to Kantishna, my wife and I would like add our vote for Alternative C for the new vehicle management plan. Having more opportunities for tours that would address specific interests would be great.

Correspondence ID: 8 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,07,2011 11:47:59
Correspondence Type: Web Form
Correspondence: After having just done one of the bus tours; I have to say it was greatly improved from the first time I did the bus tour about 16 years ago. Myself and 14 other family members enjoyed it. The nice thing about the bus is that we were all able to share in the expirence together. I like how you can get down and walk whenever you want and get picked up by other buses.It was also a nice option that if we wanted to continue on to a further point(we went took the shorter ride, as we had a few small childeren) that we could do that as well. It might be nice if there were some guided walkingtours from each of the stop points. Other than that, I think its a great system and wouldn't change anything.

Correspondence ID: 9 **Project:** 22494 **Document:** 42309
Received: Aug,07,2011 15:45:21
Correspondence Type: Web Form
Correspondence: ALTERNATIVE A (no changes) is the best choice. Sadly, an opportunity to make improvements to the Park was lost, as both Alt A and Alt B represent a step backward.

I noticed the Fairbanks News-Miner printed a story about 'improvements' to McKinley Parks' vehicle management plan. I noticed that NPS employees were pushing for alternatives B and C, so I assumed these plans would call for increased micromanagement and reductions in private vehicle use on the Park Road. After reading through the PDF, I discovered that I had assumed right.

As a lifelong Alaskan, I was hoping for an increase in the vehicle use cap, an expansion the Road Lottery, or a new program that allows some form of increased private vehicle use during low traffic periods. Barring these things, I would favor the cheapest plan available, as reduction of NPS of funds is one way to reduce needless oversight and micromanagement.

Both plan B and plan C are considerably more expensive, require increased monitoring and regulation of vehicle use on the Road, and all 'increases' are coming at the expense of already heavily regulated private vehicle use, even to the point of closing the Tek RV campground. Neither should be adopted, but I expect the NPS will do what

it wants either way. I've noticed that listening to Alaskans is generally a low priority for NPS employees. California tourists are far more likely to give the input the NPS wants to hear.

Correspondence ID: 10 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,08,2011 02:39:27
Correspondence Type: Web Form
Correspondence: Staff has made significant improvements in allowing reasonable accompdations for cyclists over the last few years. Cycling is a great way to enjoy a wilderness experience while traveling the park road. But this access method needs to be further supported as it is both a wonderful user experience and does not detract from the park's wilderness character.

One thing that does detract from the wilderness character and the experience of some users, is the approximately 100 vehicles a day (effectively 200 vehicles a day since they pass both directions)that are creating significant amounts of dust and noise. This daily number averages out to approximately one bus every five minutes.

It would be wonderful if there were a few days during the summer when the tour busses were limited in order to provide for a better cycling experience for at least a few days each month. Alternatively there could be some guidance for the busses to travel together in groups so that when a "platoon" of busses were to come by, the cyclist might simply stop for a break and then not be subject to vehicular traffic for another hour or more.

Cycling the park road is an incredible journey. Please do what you can to provide cyclists some opportunities during the summer to enjoy this world class experience with reduced impact from bus traffic.

Thanks for your consideration.

Correspondence ID: 11 **Project:** 22494 **Document:** 42309
Received: Aug,08,2011 16:31:36
Correspondence Type: Web Form
Correspondence: I think the NPS should consider personal rapid transit (PRT). PRT is an emerging technology and is being tested in Sweden. It would be almost impossible to disrupt wildlife with PRT and would offer greatly increaded access to the park.

Please learn about PRT:

http://en.wikipedia.org/wiki/Personal_rapid_transit

Correspondence ID: 12 **Project:** 22494 **Document:** 42309
Received: Aug,08,2011 16:38:35
Correspondence Type: Web Form
Correspondence: Hello, I'm writing to voice my opinion/concern about how the park has been managed the last several years. My wife and I own a new wilderness lodge on the Denali Highway. We have several guests each summer that come to stay with us, but want to go into Denali National Park. We never discourage them, but every single person we put on a bus and send them in comes back very unhappy, and they ask us why we let them do that! Our response is that you do have to see it once, and that's the only way to do it. The guests do not like the 'cattle companies' that run the folks in and out. Everything running on time, and you have 5 minutes here, 10 minutes there type stuff. Many of the comments regarding wildlife in Alaska that our guests here from the bus drivers are grossly inaccurate. The companies that are making the money are out of State, they have thier lodges open for a short summer season, their employees are 90% from out of State. The National Park is owned by all people in the country, yet we sell it to massive tour companies to manage and make money from. There are plenty of NPS Rangers out there to help manage all visitors.

Above is the background. Now a solution to make people's trip to Denali more memorable. I know this is going to sound selfish, but I felt this way long before I purchased a lodge. Why not allow smaller tour operators to bring folks in for a more personal experience? Of course, we would all follow the same rules and regulations that the buses now do, and I would imagine a training course would be required to make sure that the environment is protected and kept pristine. I own a 16 passenger van that I could fill with park visitors every single day, and it would completely change our business, and insure that we could stay in business. We are lifelong local Alaskans with the ability to conduct these tours. If you were to increase the traffic by 10%, why not let that 10% be the smaller tour companies in Alaska? I would absolutely die for the chance to take my people into the park even if only for one day a week, where my pass would be valid throughout the summer. This would guarantee that my wife, 8 year old son, and I

could make it in the summer. We are open year round at our lodge now, but summers are tough as everyone wants to go to the park and stays at the park.

We do agree that some buses are needed for the folks that do not mind traveling like that. Everyone should have an opportunity to see the park at least once in thier life.

We ask for your serious consideration of our comments and please feel free to call us anytime if you have more questions.

Correspondence ID: 13 **Project:** 22494 **Document:** 42309
Received: Aug,09,2011 13:51:04
Correspondence Type: Web Form
Correspondence: Our experience riding the park bus was very favorable. The drivers were care full and very informative. It is my opinion that increasing the number of passengers on the buses would unfavorable change the personal response to passengers and their quality of the visit into the park.

I have been a tour guide in our are for Farm Bureau tours and it is much harder to connect with visitors in the back of the bus so they can have a meaningful experience.

Thank you.

Correspondence ID: 14 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,10,2011 13:42:26
Correspondence Type: Web Form
Correspondence: I strongly urge you to adopt Alternative A. I strongly urge you to reject Alternatives B and C.

The wilderness character of the park must be maintained. Many long-term park users like me think the present vehicle limit on the park road exeeds a reasonable level of use. Expanding this limit would further degrade wilderness and wildlife values. I especially oppose efforts to increase visitation at the west end of the park road (Eielson to Wonder Lake). In the 40 years that I have been a Denali park user I've seen more and more expansion of industrial tourism--to the detriment of the park's unique values. Shifting more use to the west end is the laterst attempt to crowd more and more visitors into an already over-used area.

I also strongly oppose restrictions on the present number of research and professional photographer road travel permits. NPS must not yield to tourism proponents who would exclude all but the buses from the park road if they could. NPS appears willing to sacrifice research and photography road travel permits in order to put more buses on the road. This is an unwise approach.

Correspondence ID: 15 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 07:02:26
Correspondence Type: Web Form
Correspondence: Solution to reducing traffic on present road: develop a continuation of the present road back to the entrance point, so that traffic is only one-way along most of the 92 miles. This will effectively reduce the traffic on most of the road by 50% at least. It also reduces risks related to the two way traffic on the present road. We have been there many times, both when we lived in Alaska and often since we went to live "outside."

Correspondence ID: 16 **Project:** 22494 **Document:** 42309
Received: Aug,11,2011 07:21:52
Correspondence Type: Web Form
Correspondence: Leave it as it is! The more you do to accomodate more people, the more stress you put on nature. This is a wild place--one of the few left in the world. Do not let people pollute it with their presence.

Correspondence ID: 17 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 07:27:23
Correspondence Type: Web Form
Correspondence: I have been fortunate enough to visit many of our National Parks and was fortunate enough to visit Denali two years ago. The thing that I loved and was amazed by about Denali was the fact that there is a single road and the only vehicles on that road were the shuttle buses. We traveled for 8 hours on our tour and while we did pass other buses, our bus was by itself for the majority of the trip. after my trip to Denali I realized how my experience at other Parks (Yosemite, Yellowstone, Great Smokey Mountain, etc.) has been tarnished by the stream of vehicles. there is something truly incredible in standing on a ridge in Denali and looking out across a valley where you

do not see or hear one single man made thing as far as you can see. Without getting into the backcountry at many of the other parks this is not possible (especially with the noise of automobiles).

I would encourage you to keep the number of bus trips exactly as it is. If additional money is needed then increase the price of the trips. I have already been through the park and would gladly pay 1.5x the price I originally paid for the same trip. I would also encourage you to look at using the bus system like you have in Denali at some of your other more crowded Parks. I realize it is very hard to 'put the genie back in the bottle' in terms of stopping auto traffic in some of the parks, but it makes a visit to a National Park more enjoyable. There are many times particularly in peak seasons where the Parks are more like rush hour traffic jam than a place to enjoy. I think Dr. Hayden, Cornelius Hedges, and William Clagget would be much more pleased with the National Park experience in Denali than in their very own Yellowstone.

Correspondence ID: 18 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 10:47:22
Correspondence Type: Web Form
Correspondence: After reading the document and acknowledging that I'm not a professional in any of the areas discussed, it seems to me that Alternative A, do nothing is unacceptable. I favor Alternative C which seems to best maximize the use of the park while still protecting it. It's a big place and I think it can still have areas of more heavy use that will keep the rest of the areas safe. Living in a area that gets heavy use in the summer during fishing season, I well understand the inconveniences of crowding, but if we want to promote our state for tourism dollars instead of relying on the oil and gas business, we have to make the parks accessible and fun for visitors. People looking at wildlife in a safe manner doesn't harm the wildlife. And after many moose encounters in my own backyard, I know that noise and activity of human life isn't that much of a deterrent to them. (Just ask my chewed up garden!) Please consider Alternative C as best use of the land. Thank you for the chance to express my opinion.

Correspondence ID: 19 **Project:** 22494 **Document:** 42309
Received: Aug,11,2011 11:33:28
Correspondence Type: Web Form
Correspondence: Of course there is no choice here, too many people has been an ongoing problem in most all National Parks. i quit going years ago, partly because of the crowds, but also partly because of the dog restrictions, especially in the backcountry. I suppose the argument is dogs can disturb the ecology, which is total "hogwash", they don't disturb nearly as much a people. The Park Service is just like most bureaucracies, it's over zealous about adding to the ever growing "NO" list, some things are in dire need of restrictive rules, but the parks are now victimized by out of control traffic and have become like a Disneyland in the woods. Most park are surrounded by large tracts of national forest land, which, in my opinion, is the better option. Get bigger busses, keeps the crowd isolated, out of the pristine wilderness areas, and this is were one can connect to nature more profoundly.

Correspondence ID: 20 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 11:52:24
Correspondence Type: Web Form
Correspondence: My suggestion would be railroad...assuming the grades are not too great. If sidings would be installed several trains could run at one time. This would reduce the amount of pollution and move a considerable amount of people at lower cost than a bus. Coaches with large windows could be used for a panoramic viewing of the wonderful scenery. The train would also keep more people from agitating the wildlife and disturbing the ecology.If a small fee were charged the railroad could pay for itself. The up front cost would be high but the long term benefits would also be high. The track could be installed in segments. Where the track ends the shuttle buses could be used for transport. As time and finances would permit the tracks could eventually be extended the entire length. The vehicle road along the tracks would be used for park personnel only.

Correspondence ID: 21 **Project:** 22494 **Document:** 42309
Received: Aug,11,2011 13:29:19
Correspondence Type: Web Form
Correspondence: Why not have a centralized parking facility out side of the park. Modeled like a theme park. Build a Disney world style elevated monorail or similar. People would pay to take a tour of the park from an elevated position. The train could take people to all of the attractions without having roads. Our national parks are the greatest attractions in the world and they cost the tax payer money. They sould make money for us. Have Obama spend money on that and i think very few would oppose. The parks should not be on a first come first parking spot basis.

Correspondence ID: 22 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 13:51:41
Correspondence Type: Web Form
Correspondence: I would lean towards Option C as it works to preserve the area around Wonder Lake and it creates a menu of choices for visitors. Many visitors are not interested in getting off to hike nor do they want to stay on the bus for 8 hours. They want to experience a short version of the Park while others want to focus on the photography of the Park. It

appears that Option C gives the most flexibility while maintaining the wildlife in the Park.

Correspondence ID: 23 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 14:06:30
Correspondence Type: Web Form
Correspondence: I grew up in Alaska, and have many fond memories of our annual visits to Denali. I hope to bring my kids up when they're old enough to appreciate it, and appreciate the stewardship that you folks are engaging in to make sure that that's an option for me.

I don't know how much it's changed in the last 13 years (our last visit was in 1998), but at that time the buses were still local school buses conscripted to service over the summer. I don't know the capacity of the buses that are used, but (from the research I've done), bus capacity is usually between 44 and 65 passengers. I understand that articulated buses would not be a possibility due to the tight circumference of some of the turns, double-decker buses could provide significantly higher numbers of passengers in the same number of buses (assuming that the revenue exists to purchase the buses in the first place). As discussed in "Bus Size", in Alternative B, the road would not need to be upgraded for these buses to run. In addition, these buses are designed for tour groups, and only minor amounts of customization would be needed. In addition, there are different layouts available which offer more space for recreational equipment, allowing these buses to transport hikers, and perform the transit service as well.

Good luck with your propositions! Thanks again for your stewardship,

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Correspondence ID: 24 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 15:12:08
Correspondence Type: Web Form
Correspondence: As a frequent visitor and annual Pass holder to the National Parks, I am all for any plan to efficiently manage the flow of visitors in and through the Parks, while keeping automobile traffic to a minimum on the parks interior roadways. The bus system at Zion is an excellent example of how it can be done. With an adequate, low emissions system of environmentally friendly buses and shuttles, private automobiles could be kept at bay, in designated parking locations in visitor centers, or camping/ Lodging areas near park entrances.

Correspondence ID: 25 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 16:32:57
Correspondence Type: Web Form
Correspondence: Back in 1974 while I was working as a wilderness ranger in the USDA Forest Service for the San Bernadino Forest, division San Jacinto Wilderness, I had the opportunity to work on a proposal for traffic control in Yosemite National Pk. If the math is correct, that was 37 years ago....still nothing has been accomplished. I ask you, what is wrong with you!!!!!!

Correspondence ID: 26 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 17:00:40
Correspondence Type: Web Form
Correspondence: to limit the number of cars would be a good thing

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Correspondence ID: 27 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 17:09:37
Correspondence Type: Web Form
Correspondence: My wife and I took the tour through the park last year. We were amazed at the opportunities to view wildlife. I think that increasing the number of vehicles will dramatically alter the viewing experience and will result in a poorer experience overall.

Taking a tour bus into the interior should suffice for anyone wanting to travel through the park.

Correspondence ID: 28 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 17:45:06
Correspondence Type: Web Form
Correspondence: I just returned from Denali National Park and had a grand time. Part of the charm of Denali is being able to get away from people and see the wildlife. That is getting harder

and harder to do, as you know.

My experience has been that the "Cruise travelers", who have "one day to see all of Denali", really aren't interested in the 8 hour Tundra tour. Perhaps you could devise a shorter Tundra tour and save the longer one for those of us who really are interested in seeing the backcountry. I know you have the Natural History tour that is shorter, but maybe a tour that only lasts four hours--goes into the Park 2 hours and comes back out?

I guess what I am saying is that I prefer Alternative C.

Denali Park is a gem and needs to be protected from "too much love" by tourists. It is the only really pure area left and I feel privileged to be able to experience the sights and sounds that it offers.

I also have to comment on the addition of the Triple Lakes Trail that is still being finished. It is a spectacular hike and I really appreciate having the opportunity to hike an additional trail that is relatively close to the Visitor's Center.

Thank you so much for the opportunity to comment.

Correspondence ID: 29 **Project:** 22494 **Document:** 42309
Received: Aug,11,2011 17:46:41
Correspondence Type: Web Form
Correspondence: We have visited Denali National Park and have taken the bus tour all the way to Wonder Lake. I would like to do so again, but accept that there is a need to limit the numbers accessing the Park in this way so as to preserve the Park's qualities. I support Plan Alternative A. The preassure from commercial companies pushing for increased usage are not interested in the Park's well-being, only in money making. To preserve a proper balance of visitation and protection of our public's resource, maintaining the existing level of access is appropriate.

Correspondence ID: 30 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 18:53:11
Correspondence Type: Web Form
Correspondence: A two way rail system might be ideal for getting passengers through the park easier. Side rails could be placed in several key points where tourists might want to stop to take pictures of animals or the surrounding views.

Correspondence ID: 31 **Project:** 22494 **Document:** 42309
Received: Aug,11,2011 18:53:21
Correspondence Type: Web Form
Correspondence: Simply put: The population is growing and visitor levels will continue to rise. Limiting access is simply not going to be an option, unless we resort to undemocratic screening and/or permit options. With traffic levels set to number X are we to turn away all vehicles at X+1? At what point can we say to the citizen taxpayer, who FUNDS, the operations supporting the parks, "Sorry, but you can't come visit YOUR park."?

Having been able to personally observe the changes in park traffic since my first visits as a kid in 1959 to high volume parks such as Yosemite and Yellowstone and today's overcrowding at the same parks I can totally empathize with the NPS quandary in finding a balance. As a veteran backpacker I have one view, as you can imagine centers on that avocation. As the husband of a handicapped wife I have another which centers around access. As the father of a family of four I have again another, depth of experience to match that I had in 1959.

I personally would opt for maintaining the current system criteria for the present. However, my real impression is "none of the above." Lets not forget that the peaking of the baby boomers is also fueling some of the visitor growth as their income and time for visitation expands. Slumps in post baby boom due to age and ability may actually eventually reduce or retard visitation. Should we reach a stable or declining population level the problem may be self rectifying.

NPS needs to continue to investigation to find a viable way of accommodating the visitor traffic to all NPS users at ALL our parks if park usage continues to expand in the foreseeable future.

Correspondence ID: 32 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 23:09:50
Correspondence Type: Web Form
Correspondence: Please keep Denali as it is and do not increase traffic on the road section of highway. Do not go to larger tour buses and go to a lottery system if necessary for visitation.

Correspondence ID: 33 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 23:51:37
Correspondence Type: Web Form
Correspondence: I think it is imperative that consideration be given to the fact that the more people allowed into the park the more degraded will be the experience. Crowds at these sites removes the entire wilderness experience. Maximum opportunity for quiet enjoyment is important. Keeping the vehicles to a minimum past the 15 mile point certainly helps that, though the first 15 miles are now so crowded it takes effort to get away from crowds.

Correspondence ID: 34 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,12,2011 00:11:53
Correspondence Type: Web Form
Correspondence: I am glad our government has the extra money to waste studying this to the nth degree. This could have been greatly reduced and provide the same information.

As with most parks the road/transit system does not provide a wilderness experience. What is wild about 6 buses parked along each other with idots hanging out the windows trying to take a picture of an animal? I found this to be very annoying when I visited. Ideally the road system would provide some level of a loop which would eliminate some of the traffic congestion. Also there should be no stopping or a short time limit for busses to be stopped to view random wildlife that happens to be close to the road. These would allow more visitors with less congestion.

Correspondence ID: 35 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,12,2011 00:16:16
Correspondence Type: Web Form
Correspondence: I never have been one able to keep a schedule. For me it takes the fun out of it. Having to be somewhere at a certain time and then leave at a certain time is not my idea of a vacation. I'm sorry but life is just too short and when you get someplace that is as beautiful as Danali you shouldn't have to leave before you're ready. I'm more of an out doors man anyway so I'm sure I could find a campground or back road that might give me some of the same are hopefully better views. Everything had become too commercialized these days.

Correspondence ID: 36 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,12,2011 02:30:49
Correspondence Type: Web Form
Correspondence: The state of the wildlife in Alaska is what is important, not the revenues generated by tourists. I don't live in Alaska, although I wish I did, and therefore feel I do not have the full right to object to reducing Alaskan revenue by saying you should restrict the number of tourists. However, this is exactly how I feel about it, and tourists anywhere for that matter that are contributing to the destruction of an areas nature, regardless of the revenue generated.

Correspondence ID: 37 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,12,2011 03:44:09
Correspondence Type: Web Form
Correspondence: It is my understanding that Denali was created more by the people, than for the people. Perhaps that is one of the many draws to this special place. The visitors are important, both for the Park, and for Alaska's economy.

Yet, let us never forget why the park is there....for the preservation of its pristine land, and the natural environment in which the animal inhabitants may be protected.

If there are too many people, limit the people. Please, do not build roads (which is a nice name for highways). The Park was not set aside for Highways. Tourists may have to book in advance, many sites are like that. But the is only one Denali National Park. Please don't ruin it.

Correspondence ID: 38 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,12,2011 03:56:49
Correspondence Type: Web Form

Correspondence: My suggestion is to change nothing at the park. Keep a cap on vehicles allowed and forego any new constructiing of roads, buildings, ammenities, etc. Those visitors who really want to see the park will walk, hike, camp, etc. People who just want to sightsee can ride the bus if/when there is room. Emphasize pre-registration only!!

Correspondence ID: 39 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,12,2011 05:13:16
Correspondence Type: Web Form
Correspondence: In my opinion, Alternative C that would maximize the visitor experience by creating more tour products and adding a new, remote, wildlife-viewing zone, would be the best option for visitors provided the fee structure is amended to support the changes.

Correspondence ID: 40 **Project:** 22494 **Document:** 42309
Received: Aug,12,2011 06:18:22
Correspondence Type: Web Form
Correspondence: I have been to Denali N.P. twice in my life. I bought my ticket and rode the bus into the park. I appreciate the fact that there is limited access into the park. It keeps it both wild and pristine. Currently there is a schedule of bus tours into the park that one can choose from if one were to sell out. From what I remember, there were enough options for me to get into the park even if a particular bus ride was sold out. I think that we should keep to this level of access into the park. Any increased activity will inevitably take away from the experience of visiting the park. Pollution, noise and over-use will result from any increase in traffic. Wildlife there will remove themselves even more from human contact if there was an increase in people activity. I realize that more and more people visit the park annually. It is worth the wait to visit the park if it keeps it in sound condition. If someone is unable to visit on a particular day then they should be willing to try to make it in on the next.

Please keep the current system currently in use. If we continue to allow unlimited growth in and around our national parks, we will lose the impact that these places have in our lives. The solitude and beauty that we get from these places will be replaced by bus loads of tourists with cameras around their necks and a lack of appreciation for what they are seeing. Everything is being made to be so easy in our lives. We need to work and put out the effort for those things that we truly appreciate. Only then will we see them for what they are. Special places that need to be protected and preserved as best we can for future generations.

Correspondence ID: 41 **Project:** 22494 **Document:** 42309
Received: Aug,12,2011 07:00:39
Correspondence Type: Web Form
Correspondence: I recently visited the park and stayed at the kantishna roadhouse for 2 nights. I was never more disappointed. The bus ride was like a long zoo trolley. There were millions of acres but I was limited to just a few trails. It felt like the park was more than happy to take my entrance fee, then put me on a bus and kept me confined within a very small zone with little opportunity to explore.

Access to Denali is too easy by the volume of tour buses that travel through each day. Reminded me of something Disney would do. I suggest keeping the park open to those that really want to experience it, not just something to check off a bucket list.

I would pay more to enter if that allowed more freedom within.

Correspondence ID: 42 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,12,2011 09:56:15
Correspondence Type: Web Form
Correspondence: I support a mixture of alternatives B and C. I feel that it is important to limit the environmental impact that tourism has on the park, while providing access to the sights and experiences in a safe environment. I understand that self-guided tours will lower the impact of vehicles in the park, but I feel that a more organized, thorough set of tours, to include a ranger guided wilderness tour, would be more beneficial to tourists and help to emphasize the environmental balance that exists. A set of self-guided tours that runs approximately 3-5 miles would be ideal in heavier traffic areas, but safety needs dictate a guided tour in more "isolated" areas.

Correspondence ID: 43 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,12,2011 17:02:17
Correspondence Type: Web Form
Correspondence: Please, no "larger buses". That would nearly destroy the Denali experience. I've been on the Park shuttle (to Eielson0 probably 15 times in 25+ years. It is already difficult to hear and see from the back of the bus....there would be too many people and too few positive experiences. More visitors with reduced quality is not a worthy goal.

Some form of Alternative C would be excellent. Specialty or interest focused buses would be popular. Perhaps have some smaller vehicles (at an increased expense if necessary). Whatever you do, don't increase the number of vehicles permitted per day.

Plan A (status quo) is not bad. I'd want to look carefully at why the Park officials don't like it. If it relates to increased revenue, bad reason.

Thank you for receiving out comments.

Correspondence ID: 44 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,13,2011 10:19:45
Correspondence Type: Web Form
Correspondence: Our parks are verry important to me and I beleave that access to them is escential. Without access there is verry little reason to have them. No access to the park means that our parks have severly gone down hill.This park is 6 million acres and has only one road, that is one lane gravel in places. There is part of the problem. With out access the park should be closed and sold to private business.

Correspondence ID: 45 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,14,2011 21:02:28
Correspondence Type: Web Form
Correspondence: Thank you very much for your extensive work on this issue. I have frequented Denali NP about a dozen times in the past 11-12 years. It has become my favorite place in Alaska to visit.

Here are a few of my comments:

I don't like the highly structured tone of Alternative B. And why have a park orientation for those who have been to the park multiple times in the past and only want access into the park for day hiking, backcountry or campground use?

I like the idea of possibly converting Teklanika Campground to tents-only in the future (one of the few items I like from Alternative B). And restricting private vehicle access to Teklanika CG to designated time periods is also a good idea.

Having to change buses to get from the park entrance to Wonder Lake Campground would be a HUGE step in the wrong direction for campers. I tend to bring a lot of gear with me for several nights. What a pain it would be to have to switch buses and switch all my gear.

Remember that with the opening of the South Denali Visitor Center, it is likely that not as many people might visit the Denali visitor center area that exists now. I am already surprised that approximately 20% of the seasonal visitors only visit the entrance area. Something needs to be done to encourage these people to get further into the park.

I strongly recommend that you not implement the major proponents of Alternative B. I could live with most points in Alternative C.

Thank you.

Correspondence ID: 46 **Project:** 22494 **Document:** 42309
Received: Aug,15,2011 10:38:30
Correspondence Type: Web Form
Correspondence: Please consider a system where the large tour providers are givin a opportunity to lock in through bidding a established number of runs. This would take the the remaineder of available space and allow you to offer them on a fist come fist serve signup which could open for on line lock in the first of each year for the general public. It would also be rather nice if all such seats were made available on a day of stand by basis if any aloted seats are not used on the day of departure.This would include those locked in for tour providers and sorry guys no they dont get to charge the stand by passenger the full recoup fee, those folks would be charged the regular at the door price. To those companies it would just have to be absorbed as a cost of doing business as each load must be maximized to keep from killing the park with affection! It also seems

appropriate to statistcly insure a very small number of seats on a rotating basis as busses go out are left empty for availability of those strong willed souls who are hiking and camping the backcountry. I am sure this would be easily assertained from the sign in of those using the back country. Please maximize what you have before ever contemplating expansion. This is the most fantastic experience and I for one hope it does not become disney land of the north! Besides part of the fun of a trip that includes this park is in the planning so for those who like prepackaged let the providers have their number to the rest good luck and plan early!

Correspondence ID: 47 **Project:** 22494 **Document:** 42309
Received: Aug,15,2011 10:57:44
Correspondence Type: Web Form
Correspondence: Having visited the park in the late 80's and hiking in to the interior, I am in favor of trying to keep the status quo. By that I mean don't allow any more than the current capacity and create a reservation system for anyone who enters the park. If I want to visit the park I will need to plan way ahead and make a reservation, whether I am a tour co0mpany with a bus or an individual looking to go in to the back country. Baxter State park in Maine has done this with success for many years. It is of course even easier with internet reservations and information. I understand the need to allow more and more people to see the park, but don't turn it in to a McDonalds. I look forward to returning to your beautiful park and having it be similar to what I saw over 20 years ago.

Good luck with your decision.

Correspondence ID: 48 **Project:** 22494 **Document:** 42309
Received: Aug,15,2011 11:09:43
Correspondence Type: Web Form
Correspondence: Having visited Denali twice, the last time being early June of this year, I think maintaining the current vehicle management plan ensures access for we visitors and maintains the pristine beauty of the park. In lieu of adding additional vehicles, larger vehicles and/or designating wildlife viewing areas perhaps the best solution is to improve the reservation process especially emphasizing the need for reservations.

Correspondence ID: 49 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,15,2011 11:34:30
Correspondence Type: Web Form
Correspondence: I strongly support Alternative A and strongly oppose Alternatives B and C. I have visited Denali National Park numerous times and have had memorable opportunities to view and observe its fantastic wildlife. Plus, I work in the tourist industry and know first hand that a visit to Denali National Park is one of the most significant highlights when a person visits Alaska.

These suggested alternatives would prevent people from having such an opportunity if they are on a bus that wasn't allowed to stop because other busses are already there or if they had to be trekked way out because that is all that was available. People save and plan for years to come to Denali and to be denied the opportunity to observe a moose or a bear in its natural environment just because you are in the 5th bus is highly unfair and I believe goes against the reason our national parks were established.

Correspondence ID: 50 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,15,2011 18:29:17
Correspondence Type: Web Form
Correspondence: This is way too technical for a visitor to Denali. This is WAY out of my league BUT I feel a STRONG urge to write my feelings. I have relative that live in Anchorage thus my fondness of this wonderful land. My first visit to Denali was in 1993. The trip out to Eielson 8 hours 66 miles cannot be matched any where. This was by far so prestine territory and the wildelife we saw was almost better then buffalos out West. We wanted our family to see this too so in 2008 we brought one of my daughters and her husband to Denali prior to our Alaska cruise, to see what we have talked about for so...long. I long to come around Polychrome Pass and see the colors like rainbows. I wanted them to experience this too. We were not disappointed since my last visit almost 15 years before. Everything was the same to me. The school bus ride (now green not yellow), the dust, the wonderful tour guides, the bag lunch I brought, the rough ride, the HUGENESS, and I could go on and on and on. We were blessed this time to see The Great One (Mt. McKinley) and OH it was a WONDERFUL day to be in Alaska with eyesite to see this glorious sight. PLEASE, OH, PLEASE keep it the SAME (or as little change as possible)so that when I do, and I WILL return to Denali it will be the SAME WONDERFUL place it was on my first visit and I can show to my other daughter and my 3 grandchildren. THIS is what Denali is all about.

Correspondence ID: 51 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,17,2011 09:13:22
Correspondence Type: Web Form
Correspondence: We were at Denali in August 2011. The park is very well run and has very dedicated rangers. We particularly enjoyed the discovery hikes and the pristine untamed

wilderness.please keep it that way.Adding more vehicles would have a huge environmental impact. Many shuttle buses go only half full. They could be upgraded into semi tour bus status with drivers or another designated person answering questions and givins a running commentary. That way they will be more in demand.Maybe a $ 10 increase in fares to pay those designated people. Many historic places limit the number of visitors including statue of liberty and Denali may have to do that in peak season. People can always plan and pick other places to visit. It is the animals that have nowhere to go and we must respect that. Again Kudos to ypur family of rangers and park employees for maintaining a beautiful, untouched Denali.

Correspondence ID: 52 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,19,2011 11:04:23
Correspondence Type: Web Form
Correspondence: I support plan A. Please don't change a thing.....

Correspondence ID: 53 **Project:** 22494 **Document:** 42309
Received: Aug,22,2011 12:31:24
Correspondence Type: Web Form
Correspondence: I first began visiting Denali National Park as a professional photographer in 1980. At that time one could simply walk into the administrative office and present some documentation and be issued a road travel permit on the spot. Since those days the professional photographer has been almost squeezed out of the road equation entirely in favor of adding on additional tourist buses. I feel it would be ludicrous to reduce the number of photo permits any further when it is the huge number of noisy buses that have the most road impact. Denali, like the Grand Canyon, Yosemite, Great Smokies, and other parks, have more visitation than the parks can really handle comfortably. That is an enormous problem for which I do not see any easy solution other than limiting the number of general visitors per day, as is already done in the backcountry in Denali. But it seems like a ridiculous drop in the bucket to reduce car traffic from five to three vehicles per day and think that that will have any significant effect on overcrowding and sparing wildlife from the noise and traffic. I would focus on the buses, not the very few number of cars, for a solution.

Correspondence ID: 54 **Project:** 22494 **Document:** 42309
Received: Aug,22,2011 19:08:47
Correspondence Type: Web Form
Correspondence: This seems a drastic change down from the not so long ago 10 permits to professional photographers. Carrying heave equipment on the bus system, and being able to manage that gear, is one of the reasons photographers were given SPECIAL access in the original Denali Park charter. Please don't lower the number or change the access now. It isn't the few photographers causing traffic problems, it is all the other vehicle aand private bus rides and people going into the park to Kantishna. We need photos from Denali, and without this access that photography will be stifled. Thank you.

Correspondence ID: 55 **Project:** 22494 **Document:** 42309
Received: Aug,24,2011 10:53:32
Correspondence Type: Web Form
Correspondence: I believe there should be an "Option D" which allows the road to continue through the Kantishna area and exit/enter through the North Park boundary thus creating a "loop road". The "Northern Access Study" is already complete and the Denali Borough seemed to be in favor of this concept. It allows access to resources and economic growth in the area. A Northern Access route would allow buses to enter/exit from both ends of the Park Road effectively/potentially accommodating up to twice the number of visitors without increasing the actual traffic on the road (each bus would make one one-way trip rather than a round trip so the number of vehicles passing any given area would not increase). This would also greatly increase the Back-Country opportunities and allow for hikers/campers more opportunities to catch a ride out of/into the park. I worked within the tourist industry for quite a few years in the area, and the most common complaint I heard about the bus trips into the park, was that coming back out was so boring because it was all stuff they had already seen. Opening the Northern Access would allow service vehicles to enter from either side as well. This would allow many more services/supplies to be delivered without increasing night time traffic in any given area. The Northern Access route would also give visitors and employees an alternative exit from the Park in case of fire, landslide, earthquake, etc. It would accommodate emergency vehicles in these same events as well. I believe and "Option D 'Loop Road'" is the BEST option. Thank you.

Correspondence ID: 56 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,26,2011 17:30:25
Correspondence Type: Web Form
Correspondence: "FOR THE BENEFIT AND ENJOYMENT OF THE PEOPLE.". I've lived in Alaska most of my life. I've been inside the "Park" more times then most of the people that work for the N.P.S. in Denali, out of nessesity not want. Denali is a vast wilderness as is most of Alaska. Denali contains some very beautiful country, as does most of Alaska. Unlike Denali anyone who wants to enjoy "most" of Alaska can. President Roosevelt would roll over in his grave if he knew how our national parks are being used for the financial benefit and enjoyment of the federal government. The road should be open to the public (the PEOPLE) and their own vehicle, the rangers need to do their job. If someone horasses the wildlife they should get a ticket. If someone breaks the speed limit, they should get a ticket, ect.ect.. Denali is a great place to visit and the

"PEOPLE" should not be denied their constitutional rights to do so. President Roosevelt made it pretty simple (Back when people meant exactly what they said and didn't try to twist words around.) to understand, "FOR THE BENEFIT AND ENJOYMENT OF THE PEOPLE.

Correspondence ID: 57 **Project:** 22494 **Document:** 42309
Received: Aug,26,2011 19:08:17
Correspondence Type: Web Form
Correspondence: Thanks for the opportunity to provide feedback on this important issue. As a public lands manager for over 30 years I can appreciate the difficulty in balancing the visitor needs with the impacts to the preserve.The slow methodical process that the NPS has taken will surely help avoid the many voices who do not consider future ramifications of attempts to meet the instant gratification of those who want to encounter wildlife no matter the consequences. I was fortunate enough to visit Denali for the first time this past spring. Even with the limited automobile access I saw a snow shoe hare that didn't make it across the road.I encourage continued use of buses or slow moving trams to ferry people in and out of the preserve.Another consideration would be to provide an IMAX type theater facility that would accommodate persons with disabilities and improve all visitors experience during inclement weather. Another rather costly consideration would be a ski lift type people mover over or adjacent to existing road footprint. One advantage of this type people mover is the reduction of direct interaction or impediment of wildlife movement.This type of system may also expand the number of days that visitors may experience the preserve.

In closing, my family had a wonderful experience in Denali and would recommend it to anyone who appreciates our natural wonders. You and your staff are to be commended for the excellent public service rendered to the public and behind the scenes protecting this national treasure.

Correspondence ID: 58 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,27,2011 02:46:06
Correspondence Type: Web Form
Correspondence: I would like to submit the following comments on the Denali Park Road Vehicle Management Plan and EIS. As a Denali area resident,a frequent park visitor, and a business owner in the tourism sector, I have followed the bussing issues for a number of years, have attended the meetings at the Murie Center, and have commented before.

I am especially pleased that both action alternatives B and C would manage bus scheduling to meet measurable criteria for wildlife management and for quality of visitor experience rather than the present situation where the tour bus schedule revolves around the train schedule. I have confidence that scheduling buses to meet the NPS management criteria is a better way to go than to continue with the 10,512 per season vehicle cap.

Under both B and C alternatives, you will have to do some promotion to convince the public that visiting the park later in the day gives them equivalent value to the earliest possible departure time. Tourists, while planning their vacations from out-of-state, have been telling me for years that the animals are most active in the morning. I reply that the concessionaire wants them to think that so they will take the early morning tour(higher price)bus that brings the "land extension" cruise ship passengers back to the train station in time for the noon train. My advice to the tourists has been to buy a ticket for the shuttle bus for a departure time that permits them to get a good night's sleep the night before.

Both alternatives B and C are good. What I like best in alternative C is the creation of Wildlife Viewing Subzone 3 west of Eielson Visitor Center to Wonder Lake. When I hike in the park, this is one of my favorite sections, because it is bus accessible, but you don't have to get a long way off the road to get away from people. Cyclists also like this section of road because of less vehicle traffic.

I am concerned, however, about the section in alternative C limiting the number of commercial day tours to one per day for the Kantishna lodges. While I agree that commercial day tours stretch the interpretation of ANILCA provision granting access to inholdings, I fear that the income generated by the day tours is what is keeping some lodges in business. It would be better to allow enough commercial day tours to Kantishna to keep the current operators in business than to risk having them sell out to big operators with big political influence.

How thoroughly have you evaluated the possibility of meeting your criteria for the number of vehicles at the Teklanika Rest Area when all of your short tours will be using it as a destination, in addition to all of the buses that are presently using it? Would you be using the same criteria for the Toklat Rest Area as for the Teklanika Rest Area? I notice that there are no capital improvements associated with any of the alternatives, and that all tours would have at least one opportunity for interaction with an NPS interpretive facility. Are you planning on using the big white tent at Toklat as an interpretive facility? If so, at some point, you are going to have to replace it with something permanent, and hopefully, more aesthetic.

I do like the provision for off-bus activities in both alternatives B & C. I like the provision for the three types of ridership and price: transit, economy tour, and premium tour. I have no strong feeling about whether the transit customers should ride on the same buses as the economy tour customers or on different buses.

Correspondence ID: 59 **Project:** 22494 **Document:** 42309
Received: Aug,31,2011 15:56:31
Correspondence Type: Web Form
Correspondence: Regardless of the alternative chosen, stop making parents bring car seats onto the Park buses. This policy makes it extremely difficult for parents with children to experience Denali NP. As it stands, parents who want to hike or get off the bus anywhere must bring car seats to the Park & carry them around anywhere they go. If you wish to hike, you're forced to take your seat out, try to protect it from bears/weather, and hope it is in ok shape when you return.

Children nationwide ride school buses and transit buses without child restraints every single day, on much busier roads with higher incidents of accidents. Why are we making it difficult for people with children to enjoy this national treasure?

Correspondence ID: 60 **Project:** 22494 **Document:** 42309
Received: Sep,01,2011 15:17:05
Correspondence Type: Web Form
Correspondence: We vote for Alternative A: No Action (Continuation of Current Management

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Correspondence ID: 61 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,01,2011 19:14:30
Correspondence Type: Web Form
Correspondence: I attended the meeting held on August 31 in Fairbanks and had a chance to go over the documents provided. I believe that Alternative B while it says Optimizing Visitor Access also seems like it offers better opportunities.

I would suggest the following changes under the transit section that you would still have some buses dedicated as cameper buses with more space for equipment at least until you have had the opportunity to explore alternatives such as carrying equipment on exterior. I would also suggest buses that would turn around at various destinations which would gives those with limited time and budget the opportunity to enjoy a portion of the park they may not have otherwise if they felt uncomfortable with the idea that they may not be able to get a return seat in a timely manner to make any deadlines they may have. I realize that you spoke about a 1 hour or less wait but the realty is that when you are on the bus the bus drivers tell you their is no guaranteed wait time so if you are on a time schedule that requires you to be somewhere and you can not make the full day trip you may just opt out of a wonderful experience because you don't want to take the chance that you will miss your deadline while waiting for a return ride.

Under the Premium Tours I would suggest keeping the Kantishna Experience as Kantishna is a wonderful area and what a suprise seeing the lush green valley after being in the high tundra area. I have been to Kantishna several times and find it to be delightful and of course Fannie and her exploits are some of my favorite Alaskan stories. Also the addtional learning opportunities through off-bus exeperiences would be great, I understand that you can get off at any time but some of us don't like to take the chance that we may run into a bear on our own, get lost or there is always the fear of not being able to get back on another bus when finished.

I also was very interested in the comments last night about if a person bought say a premium short tour and started at the Visitors Center and wanted to get off at Savage River and take the Savage River hike and then proceed on to the next destination on a West bound bus that they could not. I see no reason that should not be allowed, if they paid the price for the Premium Tour in effect you are penalizing them if they get off the bus early to take advantage of the sights and oppotunities by making them get back on an East bound transit bus. They should be able to get on a West bound bus for transit/economy or a Premium Tour, of course they should be prepared that they may end up on the transit/economy but if they really want to take the advantage of an opportunity why shouldn't they be able to?

The other thing that concerned me was the discussion about reducing the amount of Rv's and campers (personal use vehicles) that are allowed on the road to reach their destination at the Teklanika Campground. Denali already has the most restrictions on a private citzen and the chance for them to enjoy the park on a more substantial bases other than day trips. I have never actually taken advantage of this opportunity but do plan to one of these days and I would like to do that with a little comfort and some extra protection from bears and wolves.

Thank you for your time.

Correspondence ID: 62 **Project:** 22494 **Document:** 42309

Received: Sep,01,2011 21:24:17
Correspondence Type: Web Form
Correspondence: I would like the vehicle access and management system in Denali to stay the same as it. The plans as I read them would make access even more restrictive especially for photographers. Keeping all visitors heavily confined to buses would make Denali not much better than riding a guided tour through Wild Kingdom in Disney World in Orlando.

Correspondence ID: 63 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,02,2011 05:53:32
Correspondence Type: Web Form
Correspondence: Do to the complexity of this document, I'd like to make only a short comment. Please do not convert the current bus system into a "tour" like system. Some may want a narrated tour and others just the occasional comment and enjoy the environment without the chatter as well as the added expense.

Also, the photographer permit system has dropped from 10 to 5 and I while I have not had one myself I don't think that number is too high.

Correspondence ID: 64 **Project:** 22494 **Document:** 42309
Received: Sep,03,2011 08:32:23
Correspondence Type: Web Form
Correspondence: I've been to Alaska three times and would like to go back. As a published wildlife photographer, I consider the present access practices inhibiting to my ability to productively capture wildlife and nature images. Additional access restrictions being discussed would be a death knell to returning to Denali. Instead of providing expensive bus tours with no chance of doing serious photography, you might produce a movie of the park, and play it at the entrance headquarters. This movie would be much more enjoyable to visitors instead of being crammed into a school bus, so close but yet so far from nature, for hours on end. Count Denali out for me if additional travel restrictions are implemented.

Correspondence ID: 65 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,05,2011 01:39:00
Correspondence Type: Web Form
Correspondence: I am righting a preliminary note of feeling as of right now and will soon send a more thorough and thought invoking comment in the next few weeks as I review the vehicle management plan a few more times to get more aquainted with it and it's lingo. I love the park. I love how people are able to visit the park via shuttle or tour... very simplistic and yet to the point depending on the means, time, and want. I love what is seen and how untouched the land is for all who visit. That's the point right? For people from all over the world to go into a land that is as untouched as possible by humans and still be able to see and grasp what that pristine landscape is all about.... and to do so in a very simplistic, easy manner or in a hint more of a put-together form with constant narration and more push for knowledge instead of simply allowing the land to speak for itself with help from the driver who also knows the land like the back of their hand. I can't honestly see the need more and more different types of tours and/or buses that can hold more passengers. If there is a problem in accommodating more people who are coming to the park, could not one possible solution be to promote the shuttle buses more? Many go out partially full... some full and others not so full.... and it is still a wonderful means of visiting the park. However, when cruises are booked and other tours are created, most visitors have no clue that a shuttle system even exists when only tour buses are presented as options into the park. Tours are wonderful and I hope they stay because it is what such a large amount of our visitors are expecting and wanting... however, our shuttle system is a wonderful means of visiting the park as well and it is rarely offered to the mass population visiting the park. I feel I am not too off base for this... one, our tours are offered to a tour program visiting Alaska (but it shouldn't be the only option) and two, our tours are what make the park lots of money and THAT should not be the reason for wanting to not only keep tours (which I am still not against) but to only mostly promote tours and NOW want to add more and more tours of different types.... Making money should never be the major reason for visiting this park. The original visitors of this park were people who were robust, adventurous, out of the ordinary, individuals who were ready and willing to travel to the new frontier. A place that was unknown, dangerous and full of wonder. Alaska in general was a more difficult place to visit and generally only tough people or people who loved the outdoors came up to meet their challenge or see what Alaska was all about. I am glad that now Alaska is open to more of the general populous and is not so unobtainable. However, I do not want this park-this park that is not full of concrete and trails and human interaction- to now mainly cater to the older generation that has problems walking up bus stairs or who has no care or ability to get out and interact with this park. The answer is not to make more trails all over this park for people who can barely walk..... why not try to cater to more of the young? The families that want to travel? The young adults that want to explore the world? The newly retired who have the ability to not only travel but who can get out and see what this park has to offer with camping and backcountry? This park is not something to just tell about and narrate- it is something that people should get out and see and feel. I don't want this park to loose what it's original concept was... to protect and preserve this landscape for us and for future generations. More trails does not do this. Nor does adding more and more tours..... it only adds to the speaking to rather than the experiencing of..... I do not want much, if any, change to the vehicle management plan.... at least not to how our tour and shuttle buses are run and maintained. Granted, they can be reworked to work more efficiently and smoothly to accommodate people better, and to still create smaller amounts of traffic on the road to impact the wildlife as little as possible. Why not rework the amount of passes available to certain sections of the park? Do park employees need as many passes as they get? Are all of the park vehicles necessary as often as they are on the

road? Do we honestly need to give out as many professional photographer passes as we do??? Why can we not rework where passes and other vehicle allowances go to possibly move them around to allow a few more shuttle/tour buses into the park?? I know that this is an ongoing struggle for a non-existent perfect road vehicle solution.... I just want the park to stay as untouched as it can with minimal change to how the park is being run on the road as possible. With all of the money and time spent into putting out this vehicle management plan, I hear that the best bits of each of three plans will go into effect for the future... however, what are the best bits of each? Why could not one possible approach containing what park service would MOST likely like to use be put out for us to look at and comment on? Instead we are given a No Change plan, and two other possible plans that are on such different scopes that how can one even distinquish what is better of the two or three? I appreciate the different plans being put out there, but I would like to know that Park Service would most likely chose so a Plan D containing how NPS would mostly likely aim towards would be most helpful in the end process would it not? There are bits that I like from the other plans B and C, however I have no clue as to what the NPS would lean more towards in order to give an accurate comment either for or against. I will continue to review the vehicle plan to come up with more detailed and more concise statements and arguments... I just wanted to put out my voice as to what some of my initial concerns and feelings were in relation to this wonderful park of Denali. Thank you and I hope that a minimal of change occurs.....

Correspondence ID: 66 **Project:** 22494 **Document:** 42309
Received: Sep,06,2011 19:34:06
Correspondence Type: Web Form
Correspondence: As I read the document, I kept asking myself why or who would prefer these options. The present system is very functional and provides transportation to hikers and sight seers alike. I rode the Camper Bus as well as caught rides on other busses along the way. Each time we caught a bus, folks made room for us and everyone had a great time sharing experiences of Denali. The nicest part of the whole system is the causal enjoyable experience of being able to hop off a bus and take a walk and catch a ride on the next. We live in a "its mine" world and the taught of having an assigned seat on 1 bus is just horrible. We take vacations and visit our National Parks so we can escape the rat race of having assigned seats, time constraints and just the need to stop and smell the roses, so to speak.

As I said, I wondered who would want the other plans. It seems to me, someone is wanting to profit from Denali by running larger or more buses. Let's face it, we have capacity limits on every sports event. There are only so many seats available at a football game, symphony, movie theatre, public library, or any other event therefore I see no reason we can not have a limit on the number of buses/visitors that travel the road. As nice as it would be to allow everyone to drive in Denali, Denali's beauty requires limits so that it is place people want to visit. Without these limits, it will become just another tourist attraction that sells t-shirts, maps, and photo opportunities, coupled with bigger lodging and some corporation claiming they must be allowed to profit from our National Parks! If we let more people/cars/buses in then someone will build another hotel/lodge and then we will have another 344 page document asking for public comment on increasing the limit again and again.

This system is working. People riding the buses feel the system works and not 1 person ever made a suggestion that another bus was needed. Leave well enough alone. Keep our National Park special!

Correspondence ID: 67 **Project:** 22494 **Document:** 42309
Received: Sep,06,2011 19:37:29
Correspondence Type: Web Form
Correspondence: In response to the Denali Draft Management Plan, having studied the summary of the alternatives, I believe the alternative of choice should be alternative A with a few minor tweeks to the current system. The reasons for Alternative A being the best overall plan include:

A) There are already TOO MANY vehicles using the Denali visitor center bus stop. These include ALL FCS buses including dog demonstration buses that pick up at the visitor center stop exclusively; ALL the various hotel shuttle buses and vans, many of which come zooming in on no published schedule and park wherever they can squeeze in or even load and unload passengers in the left "lane" hence impeding the flow of all traffic in this already overcongested area; various buses and full sized motorcoaches staging there for their tours; and more and more DNHTs and TWTs are also loading and unloading there. Loading and unloading full buses is not a quick process and there is NO WAY all TWTs, DNHTs and VTS/transit buses can be safely accommodated! You should survey how many buses come through there between 3 and 4 PM alone. I am a bus driver. That stop is Grand Central Station already! NO MORE BUSES ON THE EAST END PERIOD!!!

B) DON'T EVEN THINK OF MORE PAVEMENT! The east end is also part of the park, the only part some visitors see and it deserves to be protect unimpaired for future generations as much as the park west of Savage River. Visitors should be able to see wildlife without having to pay to go past Teklanika. Current sightings of wildlife east of TEK are abysmal most of the time. The east end is important wildlife habitat but is currently being developed and paved over at an alarming rate. I, as owner of ALL the national park, demand that the NPS defend the east end!!!

C) Any employee shuttle system and/or combining of an "economy tour" with transit or having three systems (premium tour, economy tour and transit), as mentioned in

alternatives B and C, would put more buses on the road which is the wrong way to go. It is not permissable to increase the park roads capacity. It is already there.

D) In regards to NPS vehicles on the road alternative C is the best option thereby contractors and NPS vehicles would be restricted and managed to minimixe displacement of visitors and prevent resource impacts. The are days on the park road where there is a government plated vehicle around every corner!! How can the NPS, including the superintendent have a clear conscience about limiting the number of buses, professional photographers and TEK campers but not their own use of the road. The government vehicles do make wildlife stops and have been known to hog the best view point and take pictures while bus passengers don't get the best view and the NPS vehicle not leave until the wildlife is hidden or leaves. This past weekend I was out in the park and our bus passed the park superintendant and some of his friends on bicycles. I know they used their own personal vehicle(s), possibly gov. plated vehicles to access that part of the park. If there is too much traffic on the park road special permits because of who you know should not be permited. No exceptions.

E) In regards to commercial use for Kantishna inholders alternative B is the best option.

F) In regards to TEK campground vehicles the best alternative is alternative C for safety reasons. Many people in private vehicles feel they have to dash for the road edge when they see a bus. This is accidents waiting to happen. Keep TEK campground open to campers and RV's but require them to go in and out past Savage River after 5PM only, or during other times when the buses on that stretch of road are infrequent.

G) In regards to professional photographer permits keep it as it is. It is already practically impossible to get a propho permit. 5 vehicles per day is NOT causing the problems on the park road as seldom are they all at the same place at the same time. It would be good IF you could get the tour buses, TWTs in particular, spread out and keep them spread out but those schedules are set by demand on part by the tour companies outside the park who have their own tour schedules. This is probably not within the control of the NPS.

H) It is NOT practical nor safe to have drivers drive out to Wonder Lake, back to Eielson, and then back and forth to Wonder Lake another time or two, then drive home to the east end for the night. Bus drivers are human beings, NOT robots. To have separate bus fleets and drivers drive to and from Eielson from the east end and to and from Wonder Lake/Kantishna from Eielson would be too much for the health and well being of the drivers, not to mention a very real safety risk. The alternative would be a new bus yard, fuel bay, dispatch building and employee housing including either an employee dining facility or more private vehicles on the road, at Toklat or Eielson and that would mean paving more of paradise. Totally UNACCEPTABLE!! It is also not practical to have passengers repack all their stuff to change buses if they have a bus ticket to Wonder Lake. There would have to be a whole new lost and found at Eielson and there would be increases confusion among already often confused visitors.

I) The idea of carrying recreational equipment on the outside of buses is NOT safe as it would make already close passes on some sections of the park road impossible. It would also mean heavy lifting for the drivers and greater risk of injury, missed work and overtime having to be paid to available drivers, potentially delaying buses from their schedules and adding to a congested time period on the road as buses would get backed up due to the time required to load and unload equipment evne without anyone getting hurt. Recreational equipment on top of buses would make the buses even more top heavy and less safe. Equipment on the fron or back of the bus makes it longer and more difficult to pass other buses and make tight curves. Same goes for have equipment on the sides of the bus.

J) Another BAD idea is larger buses on the park road. The HDXs already being used for TWTs are too big for the park road. While comfortable for the passengers and drivers and having great visibility in the mirrors the mirrors are in the way when passing and make it difficult for the driver to see oncoming traffic, including other buses. The only way to have bigger, either wider or longer, buses on the road is to widen the road and make it two lanes. Longer buses also have wider turning radiuses and need wider roads including wider curves to make turns. Widening the road is not legally permitted under the current management plan and is NOT an acceptable use of the park road. It would also destroy all the good wildflower viewing and photography along the road. As Enos A. Mills, the originator of park service interpretation, said the flowers and trees and other plants are as much a part of the parks as the animals and geologic features. I for one encourage my passengers to get off the bus, walk the road and smell the fireweed and other roadside wildflowers. I will NOT allow you to pave them over for buses, cars or BIKES. No new bike paths along the park road including the front country past the visitor center.

K) The road between Savage River and Teklanika (Wildlife Viewing Subzone 1) is one of the most dangerous sections of road in the whole 92 miles. It is very slippery and sloppy when wet which is frequently in the summer season. It has also been narrowed in many spots and has many steep, straight down, drop offs where a bus or private vehicle could roll. Do NOT for safetys sake increase the number of vehicles or the width or length of vehicles on this stretch of road. Longer buses often have wider turning radiuses and need wider roads including wider curves to make turns.

L) In regards to tour buses it would be desirable to spread them out more evenly throughout the day in contrast to the current system where up to 30 buses go out between 5

and 8 AM and are called the morning tour "pack" for a reason. There is also an afternoon, much smaller, tour "pack". If you can find a way with the concessioner to break these up that would be great.

M)As for transit scheduling, and I like the use of transit as opposed to VTS, the buses should run as they used to on a schedule determined for maximum pacing. Currently the majority of transit buses leave the wilderness Access Center between 6 Am and 10 AM. This works great for passengers wishing to hike and catch a later bus. However, on the cold and/or rainy days when most people just want to stay in a warm, dry bus or for those people who are going into the park hoping/ expecting to see wildlife the buses end up bunching up sometimes, NOT as badly as the tour pack. If the buses ran on a set schedule instead of on demand as they currently do they could be better spread out on the road. There would still be late morning and afternoon buses, with sweeper buses allowed on warm, sunny, busy hiker days, to pick up people who want to stay out in the part for whatever reasons. Try having no more than five buses including the Kantishna Experience, Kantishna, Wonder Lake, Eielson and/or Toklat runs and/or one TWT leaving the WAC in any one hour.

Correspondence ID: 68 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,07,2011 11:00:17
Correspondence Type: Web Form
Correspondence: Hello,

I've read through the bulk of the document, but want to keep my comments short and to the point. Over the years, since the park has been managed by Aramark/Doyon more and more, it has become more about profit and cost reduction for Aramark/Doyon at the sacrifice of services and increase of costs. The times of year when Alaskan residents can enjoy the park seem to be getting less and less. Alternatives B & C seem to be tailored to maximize profit for the "contractors" by cramming as many people as possible into every bus every day. The more people that are in the 10,512 vehicle limit the more money in the contractor's pockets.

DNP is a resource for the people to enjoy as an Americans and as tax payers. To see it getting exploited for commercial profit while pinching the individuals is the wrong way to go. I suggest that before ANY decision is made, every single person that has a voice in this process needs to experience the park system in as many ways possible from the beginning of the season to the end. If you don't have a first person view of the system, how can you speak on how it should change? Planning on paper is important, but it is baseless if one has never been "through the system" as it is. This is crucial to visualize how alternatives B & C would impact the park user.

Correspondence ID: 69 **Project:** 22494 **Document:** 42309
Received: Sep,07,2011 15:01:16
Correspondence Type: Web Form
Correspondence: I am not at all supportive of projects that increase vehicle traffic into wild places. The road is currently enjoyable for walking and biking, and additional vehicle traffic would make such activities more difficult and less enjoyable. Driving should be discouraged; human powered travel should be endorsed rather than motor vehicle traffic. Please do not increase motorized access into the park.

Correspondence ID: 70 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,08,2011 13:00:19
Correspondence Type: Web Form
Correspondence: I feel Denali National Park should study the possibility of creating a loop road system with one-way traffic. The road would extend to Kantishna as it already does and then turn to the north and tie into the Stampede Road and back to the Parks Highway. One way traffic would actually decrease the daily traffic by one-half. this would decrease the vehicle disruption of the wildlife and the visitors would also see only half the traffic on their visit. Thank you.

Correspondence ID: 71 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,09,2011 15:46:22
Correspondence Type: Web Form
Correspondence: Although spending nearly a decade as Eielson/Toklat Dispatcher, I've used my road pass only three times. I live with a Wonder Lake driver. I have often needed the assistance of Interp. Rangers for a variety of reasons. I have heard the complaints of the tourists when they find out the Wonder Lake bus does not go to the north end of the pond. I have heard their groans when they wait over an hour for a bus at Eielson. I have felt their pain by waiting several times for over an hour and a half, soaked with rain on the roadside after a backcountry excursion.

Why not a contact station at Teklinika? It's already impacted, the road is wide enough to accommodate an increase in Tek Tour passengers, particularly if the RV camping is

disallowed; and it's a MUCH better spot for the bookstore, more customers. From there, Interp. Rangers can board buses and hopscotch between contact stations.

The concessionaire currently has inholdings in Kantishna, with a bigger bus yard and bus service station there, we could REALLY streamline the VTS bus system. By basing a few buses and drivers out of Kantishna, we can run a loop system from East End to Eielson, and a second loop from Kantishna to Eielson. There would be no Wonder Lake and Kantishna day trip shuttles, except for Camper Buses. All Kant/WL passengers would have to disembark and check in with the dispatcher for a bus to the East End, or a return to Kant/WL. The buses leaving Eielson and returning to Kantishna by way of Wonder Lake would be filled by ticketed passengers on a first-come-first-served basis, with the aid of the Eielson Dispatcher. Rescue buses can then be sent from either end of the road, saving time and cost; there will be less driver overtime, saving the concessionaire alot of money. Whether separate tix to WL and Kant. are sold depends upon you, but the most profitable, cost-effective and simplest solution would be to sell a single one-price-fits-all ticket or upgrade; less hassle for the drivers, the WAC and the dispatchers at Eielson.

Camper buses will continue to carry campers, gear, employees and their luggage. They will still be needed so that Eielson (in particular) does not become a luggage transfer station. Camper bus luggage space may need to be increased to facilitate employee groceries and necessities. Vans are not going to be sufficient, particularly at the beginning and end of the season. Camper buses should be given LESS time in the schedule for wildlife viewing, after all they are the cheapest seats, but also, employees want to go home, not look for microdot sheep. If you want longer wildlife stops, pay for the more expensive buses, it makes a great selling point. There should also be a Camper bus on a more flexible schedule leaving the Toklat Road Camp on shift-change days.

Employees deserve the option of driving personal vehicles or using the shuttle; perhaps a fee paid at the Savage Box? Better yet, an incentive that takes $50 off the rent for the months employees refuse their permit, and add that $50 dollars as a permit fee for those who still prefer to use their own vehicles. Some employees have situations that require off-hour arrivals and departures.

The self-guided economy tour is a very good idea on paper, but will lose its luster in practice. Putting headphones on passengers will create control issues on the bus, particularly at wildlife stops. Separating people and services on the same bus for socio-economic reasons, or any other reasons, was tried until Rosa Parks refused to give up her bus seat. Someone who waited an hour for a good seat is going to be similarly aggrieved to find they are being uprooted to accommodate someone who just rented a pair of headphones. Keep separate tour experiences on separate buses.

My BIGGEST concern is the outlandish increase in air traffic the past couple years. Now my girlfriend and I can add to our wilderness experiences being targeted as pseudo-terrorists by military jocks flying Warthogs. On page 22 of the road management plan, human induced noises in the backcountry are termed "intermittent". Not on a sunny day in glacier country! It is constant and VERY much imposes on the wilderness experience for those of us whose experience with glaciers requires a modicum of effort. What is the limits on air traffic? Are there fines for offenders? Who polices the NPS Organic Act?

Correspondence ID: 72 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,09,2011 17:35:17
Correspondence Type: Web Form
Correspondence: The fact of the matter is that the park road is heavily used. Its use should not be increased in any manner, as it would detract from the wilderness character of the park.

Denali is one of the most popular tourist attractions in Alaska, but a low quality service is provided to the visitors. The buses currently used to access the park are recycled school buses. If you want to improve the visitor experience, improve the buses.

Other popular tourist destinations have sold out to quantity over quality. Kauai, Hawaii is a perfect example. The constant helicopters flying overhead ruin the experience of people on the ground. In some cases, the only way to maintain the quality of the resource is to limit access. This is certainly true of wilderness. Don't bring in bigger busses, expand the road, or increase traffic volume.

Correspondence ID: 73 **Project:** 22494 **Document:** 42309
Received: Sep,11,2011 12:28:26
Correspondence Type: Web Form
Correspondence: Please keep the current system intact. An increase in vehicle traffic would likely have a negative impact on the Park's natural resources.

Correspondence ID: 74 **Project:** 22494 **Document:** 42309
Received: Sep,19,2011 14:48:15

Correspondence Type: Web Form
Correspondence: I would encourage NPS to select the no action alternative A. This seems like the best alternative at the current time. There are too many unanswered questions about alternatives B and C for me to endorce them at this time.

Correspondence ID: 75 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,20,2011 00:17:44
Correspondence Type: Web Form
Correspondence: In revising the rules governing use of the Park Road, NPS should be more sensitive to the needs of in-state backpackers. For example, winners of the road lottery learn to their dismay that it is forbidden to park a vehicle along the Park Road and go hiking on a nearby ridge. In addition, winners are unable to park their cars and camp overnight at a site like Wonder Lake. As a result, the sole use of a road pass is to drive to the end of the road and simply turn around and return. There are no opportunities to park and hike. This seems more like Disneyland than a national park.

Aside from the backpacker-unfriendly seasonal road pass, the great majority of the park's services seem geared toward senior citizen package tour groups that just ride the bus in and out. The park service should decrease the vehicle allocations given to such groups and introduce an in-season backcountry hiker road lottery system for small groups planning overnight hikes of two or more nights. This pass would make the park more user friendly for Alaskan outdoor enthusiasts looking to spend a long weekend in the park without going through the red tape intended for out of state first time visitors. As it stands, because of the red tape associated with standing in lines at the WAC for passes and dealing with the bus, it is virtually impossible timewise to take a weekend backing trip to Denali from Anchorage. Passes distributed at the WAC should be available in advance from the park website to those who are not new to the park.

Making the above changes would further the park's goal of enhancing the experiences of true outdoor enthusiasts and would help alleviate the frustrations of frequent park users.

Correspondence ID: 76 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,20,2011 17:21:21
Correspondence Type: Web Form
Correspondence: If there are in your opinion too many vehichles using the park road then one place you can lower the volumn is to do away with the road lottery at the end of the season thereby elimiating over 1000 one way vehicles/2000 round trip vehicles. If this is not possible then there should be NO CHANGES.

Correspondence ID: 77 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,22,2011 19:07:11
Correspondence Type: Web Form
Correspondence: I AM SENDING A HARD COPY OF THIS AS SOME OF MY COMMENTS MAY HAVE BEEN LOST WHILE TRYING TO PASTE THIS HERE! THANK YOU!~Cissy McDonald I care immensely about Denali. I have driven the Park road literally THOUSANDS of times in my 12 years as a VTS Driver. I spend 11 hours a day with visitors to this park in a bus on the road. EVERY WEEKEND for over 10 seasons, I ride the buses to access the park. I have experienced the shuttle bus system from both the operator and the passenger perspective on countless occasions. I have been that Driver on an 11 hour "no bear," rainy day where 10 buses are piled up at a caribou in the road and then my bus broke down. I have seen the sheep hesitate to cross due to traffic. I was there when the bear in Sable Pass rammed a bus' service doors on a high traffic July day after having her cub threatened by a boar and too many buses in her way at this sensitive time. I have seen professional photographers approach wildlife and even "howl" loudly at the wolves on the road. I have seen NPS wildlife tech.'s leave food out unattended and talking loudly in a party-like atmosphere at a wildlife sighting. I have seen NPS Admin. Vehicles stop in the best spot for a bear sighting and NOT LEAVE for over 20 minutes while 6 buses had to wait to get a view. I have heard families discuss that they "better not hike because the buses look too crowded" and they may not be able to get a ride. I have BEEN that hiker, nearly hypothermic once, waiting over an hour for a seat and had to take a bus in the opposite direction just to get out of the cold. I have been a passenger on a bus when a fight broke out between 2 people over a window seat. The Denali Park road experience can be amazing or miserable depending on the circumstances. Although we need to define the standards or goals, there is always going to be a need for creativity and flexibility. Otherwise we run the risk of just selling the Park road experience to the masses without regard for people or this place. Denali means so much to so many of us. This plan is our chance to PROVE to Denali that we truly are "stewards" who wish to protect and preserve what's here for future generations. I can only hope that whatever the outcome, the end product reflects our collective commitment to Denali. When I read each proposed alternative, none alone stands out as "perfect." I hope that there will be a blending of all the good ideas. It will require creative thinking and likely many future adjustments to get it just right. There should be a quick response time to correct any wrongs. If too much time lapses and we fail to adjust quickly, thousands of visitors will have a substandard experience and the wildlife may suffer. So I would like to see a public meeting venue implemented near the end of each season to incorporate new ideas or make changes that can be implemented by the following season. This meeting should include the public and those people IN THE FIELD who might know something about the condition of the Park road, including NPS and the bus Drivers, Kantishna inholders and the local community. My biggest concern after reading the plan is that there is no set limit mentioned anywhere. The beauty of a number like 10, 512 is that we know our limitations. To say that the limitation is only that there should not be more than "x"

amount of buses at a wildlife stop is too vague. It means there could be 200 buses on the road as long as long as they don't all stop at the same bear. To leave the projected need for the following season at the discretion of the Park's superintendent or even a committee is frightening. That gives only one person or a small group too much control and concerns me that their views could be swayed to not always represent the best interest of the Park, the independent visitors and the wildlife. The shuttle bus IS PUBLIC TRANSPORTATION in lieu of a private vehicle. At NO TIME should that bottom line EVER be overlooked or compromised. It is supposed to provide ACCESS to the Park, not just a scenic drive through it. If the system is too scaled down, it does NOT allow for ACCESS- for people to want to get OFF THE BUS and then be assured a way out when they are ready to go. People will ONLY get off the bus to access the wilderness IF they feel confident that they will get a ride back in a reasonable amount of time. So I feel VERY strongly that no matter WHAT the plan entails, that there is ALWAYS a MINIMUM number of transit buses running on a schedule. That should never be compromised. Alt. A (no action): the current system could work just as it is with a few adjustments. Spread out the TWT's. Force the Tour companies into the idea that there are an equal number of am and pm tours, with a "sheep gap" of a few hours between the two groups. This spreads out the impact and provides a better experience for ALL visitors (including transit) and the impact to the Park. The lodge buses do not NEED to travel during those peak am hours all at once. Force them to spread out their daytrips as well. The current Discovery Hike bus is way under- utilized Westbound. It serves a great purpose as a sweeper Eastbound, but westbound, it carries only 22-23 people. As the NPS Interp. Rangers at Toklat have done, utilize this more "express" bus as an employee access bus from East end (or Toklat) to Eielson: Whether for employees accessing their job sites or Toklat/Eielson residents to access their housing with all their things. The "Disco" bus could make a drop at the Toklat Road camp for those residents so they don't have to carry all their stuff from the rest stop. There are plenty of unused seats Eastbound. Both NPS and JV employees should be able to use this bus for accessing the Park Eastbound on days off as well if they intend to hike. This "frees up" seats on other daytrip buses at Peak hours for paying visitors who want to travel at a slower pace. Why not use the "Disco" bus as an Eastbound ONLY "express" bus? Everyone who rides it will need to GET OFF that bus: for work, at their housing, or to hike. Then it resumes its sweeper bus status Westbound. As far as ways for NPS staff to interact more with visitors, why not have an Interp. Ranger ride the Savage River Shuttle (SRS) bus OR better yet, why not have a SRS bus "Disco" Hike? It would be completely free for visitors to join a Ranger on an East End Discovery Hike along that stretch of road or even a guided hike along the new Mountain Vista trail? Currently, the "on demand" system of adding a "double" bus when numbers look high, works. BUT I feel VERY strongly that a double bus should only be added after peak hours. Currently, we send doubles at 8, 9 and 10 am. But then the 11am and noon buses are empty!? #1) When the early am buses fill up, why not "force" visitors to have to take a later am bus before sending out doubles? #2) or maybe send doubles at 10am and 11 am rather than during the peak hours? #3) IF the current peak hour double buses are going to continue- why not at least spread them out a little. Since they are added buses and are NOT on the public schedule, put a 15 minute gap between them. So for example, there needs to be a double sent for the 8, 9 and 10 am buses: then send the double at 8:15 am, 8:45 am and at 9:45 am. These are time slots close to the same departure times and not taken by other Wonder Lake or Kantishna buses. Alt. B sounds like a logistical nightmare and the "herd" mentality. It has little regard for the visitor experience or for freedom to explore. The idea of COMBINING the economy tour on the SAME bus as transit will NOT work. The socioeconomic separation and "preferred" seating is an affront to "poor people." Currently, even the "poor people" can stand in line early to get a good seat on the bus. Under Alt. B, a poor person could likely NEVER get a good seat. This is supposed to be affordable PUBLIC (that means EVERYONE- even POOR people) transportation to access "YOUR National Park." If you insist on an economy tour on the same bus as transit, then there should be NO preferred seating. And rather than an audio recorded tour, why not provide supplemental printed literature like a "Milepost" or "Roadside Geology"? Also more interactive things like activity packs for kids are great! There should be NO prerecorded audio aspect included on any bus. By encouraging people to put on headphones, you are shutting them out of the potential personal interactions that surround them. As both a Driver AND a passenger on our buses, I can testify that the dynamics on a bus can be fascinating. Some days are quiet and sometimes there are conflicts, but on many occasions, I have witnessed people from all over the world sharing their windows, offering their binoculars to one another, exchanging e-mails, offering rides to backpackers, etc? They are experiencing the Park together. The diversity of the bus itself IS part of the Denali Park road experience. Furthermore, people will be less likely to GET OFF the bus and explore if they are chained to an audio guide. Another logistical aspect to a prerecorded tour is how can a Driver be expected to manage wildlife sightings or communicate other pertinent information over an audio recording? Drivers have been reprimanded for having people hanging out windows. Drivers are the ONLY ones to manage the public on the buses. To say that the Driver would "provide a minimal level of orientation to facilitate wildlife viewing" is insulting to me as a Driver. We have been held accountable for years for the actions of our passengers. The ONLY tool we have to enforce NPS' rules is our ability to communicate the rules and explain (educate). Otherwise, our voices fall upon deaf ears that are tuned-out and we cannot be heard by the other people on the bus because those with headphones on are talking even louder over their audio recordings at wildlife sightings. Also, how could an audio recording or podcast keep pace with real time? One caribou in the road for miles can hold up a bus for 20 minutes! What about following the grader for 10 minutes? Will it just stop playing when I'm stopped at a construction site? And then where a Driver needs to "make up" that time, will the recording keep up? Alt. B proposes no Camper Buses. Loading and dropping off campers with gear takes time. As it is now, usually a regular shuttle will only have a few Campers/gear along the road so it's not a big problem. But lots of gear takes up seats and takes up wildlife viewing time from the other" day trippers". It is NOT a good idea to keep hanging more stuff off the buses to haul gear (with the exception of a small bear spray container on the outside of a bus). The underbellies of most buses are filthy and do not open. I have passed buses within an inch- the road is too tight to keep hanging stuff from the buses! The gear must be contained INSIDE the bus. Watch backpackers at each rest stop: they are fishing stuff out of their packs all the time. How will they access their food, maps etc.? It will be very difficult to access any gear on the outside of the bus as needed. Also the outside of the bus is dusty and/or muddy. Their gear will likely get wet or dirty or ruined from exposure. The Camper Bus has room for gear and has more time for loading. There should always be a minimum number of Camper buses available. The bus system is supposed to provide ACCESS to the Park. That should always be remembered. Alt. B refers to the "comfort" of economy tour passengers. What about everyone else's comfort? Catered-to comfort is what a tour bus is for. The transit buses are here to provide access. Even the NPS analysis concludes that Alt. B (pg. 177) will have a ?"negative impact on access to wilderness." This DIRECTLY conflicts with the values of this Park. Pg. 139-140 talk about this Park's, "?Outstanding opportunities for solitude or unconfined recreation ?encountering few, if any, people ?freedom to explore" and the "ability to be spontaneous." That's what this Park should provide. Nowhere does it talk about the "comfort" of tour passengers. Nowhere does it mention to cram as many

people as you can on the biggest buses possible so that no one can even think about getting off the bus for fear they will not have a ride afterwards. NPS employees should be encouraged to ride buses and it should be easier for them to do so. If there will be guaranteed ridership for commutes to/from work locations, seats could be blocked and reserved for them. They could use the "Disco" as I mentioned earlier. Buses that are giving rides to employees to their West end housing should be allowed to drop employees and their stuff at the road camp. There should be NPS employee passes issued that NPS can show to board all buses space available and they should be able to reserve a seat if using the buses for commutes to work or housing. The employees who live at Toklat, Eielson or Wonder Lake should be allowed to drive their own vehicles them to use and the buses took them straight to the road camp (and there was an incentive of some sort), I bet some would prefer the bus. I know the buses can be slow, especially because they stop for wildlife and rest stops. BUT once again, utilizing the "Disco" as an "express" bus would help Westbound. Also, may I suggest minimizing wildlife viewing time on the Camper Buses? The Camper Buses have a normal allotted time for wildlife viewing, etc? as a daytrip bus and then extra time for gear-loading on top of that! They are SLOW! Most campers are getting off the bus! Let them use their wildlife viewing time for loading gear and keep their wildlife stops to a minimum. That way, employees would be more likely to use the Camper Bus for transportation. West end employees should be allowed to use thier vehicles once weekly as they currently do. But they should NOT travel during peak bus hours. Instead, they should be allowed to travel between 3pm and 6am. The "low-volume" hours of 10pm to 6am is not practical. I have spent much time at the Toklat road camp and have seen the many reasons employees might need their own vehicles. My boyfriend has had a Toklat road pass for over 10 years. He has only used it 3 times in 10 years. (This year he had to move-in to Eielson before buses ran and has to move-out after buses stop running.) For over 10 years, we have moved him in and out of the Toklat road camp using the buses. But it has NOT been easy. First of all, we had aces to the buses, which all NPS employees should have, and we were able to get most Drivers to drop us at the road camp when moving in/out. But many feared getting in trouble for doing it. Other occasions, we had to borrow someone's car from Road camp to go get our stuff from the Bear resistant food lockers at the rest stop where the bus left us. We have had to use Camper Buses because we were transporting an entire season's worth of food and clothing and his bicycle and camping gear, etc? I have used the buses every week for over 10 seasons to go see him and then we usually use the buses on our weekends to access the Park. It is not for everyone. But it CAN work for some. If the new Toklat/Eielson Interp. Rangers who don't have cars were encouraged to use the buses more for weekend grocery shopping, etc? and it was easy for Finally, if TEK Campground remains the same with TEK passes, then there should be a multi-day use fee associated with the pass as the JV has to bite the bullet with the unknown ridership from TEK clogging the buses. JV has to scramble to send a sweeper if buses get too full. There can be as many as 15 people waiting for a bus at Tek! That's fine, but make them pay! If Tek Campground becomes "tent only, "and there is a "TEK tour," I think the idea is worth exploring BUT I worry about the displacement of all those RV's! Where will they camp? The LAST thing I want to see is yet another campground along the pavement to accommodate them! Alt. C seems to care more about the visitor experience. I care about that too! I would much rather see a separate economy tour bus for an econo. tour as proposed in Alt. c. That bus should have a tour Driver who can actually give the information that would have been provided in a prerecorded format. Perhaps that bus could have an Interp. Ranger that rides along for a stretch of road as is done with the KE? Rangers from East and West could "bus hop" in a way that they catch each econo. tour bus EITHER West OR East bound (not both) and present an interpretive program. Or there could be a special interpretive program for econo. tour passengers at set locations like the Visitors Center? If you decide on a separate economy tour bus, then it needs to be sent out with space between it and transit buses. STOP sending a bunch of buses at the exact same time! Give at least 15 minutes between EVERY econo. tour and transit bus. No more "double buses." Perhaps the econo. tour can go out at the "econo. time" of day? They can be scheduled for before or AFTER the peak am TWT's and transit buses: 5-6:30am or between 9:30-11:30am? I realize I have made many suggestions to SPREAD OUT all bus traffic. I realize this may have a negative effect on the wildlife. ALL of the Alternatives have a potential negative effect on the wildlife but at least this Alt.) would improve the experience for people! Unless you plan to lessen the number of buses overall, I don't see how we can avoid impacting the wildlife. But we can improve the experience for people by spreading out buses and we can minimize our impact to other resources in the Park by not flooding the rest stops and Polychrome and Stony Overlook all at once! As for limiting the times when TEK campers can drive in to the campground, I like the idea, but my only concern is that there will likely be a long line at the Savage check station when the "gate opens" for them. That line will take forever to give each person the required info. Meanwhile, buses will get backed up in the line of RV's! Maybe there could be a Ranger dedicated for buses at those times to expedite the buses who can drive past the line of RV's? The Eielson-Kantishna "loop" bus idea is interesting. I know they did something like this in the past but it did NOT work. I'm not sure why, but there are senior Driver's here who might remember why they stopped doing it. If a loop is tried, the 4 Camper buses should still run the entire length of the Park road as they currently do for practicality reasons (as discussed earlier, Campers have specific needs). Alt.C jives with the "access to wilderness" aspect of this Park's mission. As for diversity in tour-like options, why not incorporate the MSLC and the smaller tours in sprinter vans? I'd RATHER see these smaller specialized groups out there than dedicate a whole other economy tour bus system. People could pay a little more than transit, but less than TWT and be on a "bird-watching" tour to Toklat in an MSLC van? General comments: Bus sizes need to be as uniform as possible. There are too many factors like bus breakdowns to restrict a certain bus type for a dedicated purpose. For example, this year, the KE had to use any bus available for use because the bus dedicated to the KE kept breaking down. Keep the bus fleet as uniform as possible to allow for the most flexibility. 52 people are too many! I think that is the absolute maximum number that should be on a bus. It's just too many people to try to view wildlife and enjoy scenery. Also, the biggest complaint I have seen on VTS buses are that the Thomas forward control buses used primarily for Toklat/Eielson's have terrible windows. I felt I had to apologize to passengers because they just couldn't see through the mud on their windows. They can't even SEE the Park! Even IF there are squeegees at the rest stops, just 5 minutes down the road and they caked with mud again. The conventional buses that were used for Wonder Lakes/Kantishna runs almost exclusively seldom have this problem. Also, there are other forward control buses like our old Blue Birds that seem to have better cleaner windows! The concessioner needs to take this in to consideration when buying buses! With an increase in the number of buses to the Park, will come an increase of employees. Where will they live? JV is strapped for housing and NPS offers them no solutions. Pg.93 cites there were 4,028 trips made in private vehicles past Savage!? NPS needs to get a hold of that! Why so much traffic? Who are they? As for monitoring any proposed alternatives, (# of buses at a sighting, in a view shed, etc?): This monitoring should be done FROM THE BUSES! Otherwise there's just yet ANOTHER vehicle on the road just cruising around looking for wildlife. This is part of the problem! Also, how do you propose to enforce said limits on # of buses at a sighting or in a view shed? When 10 TWT's and 6 VTS buses and all the lodge buses are all sent

out within a 2 hour period, there are going to be many occasions where there are too many buses at a sighting or in a view shed. Just because I'm the last bus on the scene, and there are already 6 buses there, does that mean I have to drive right by that bear because no one else will? Really? How will the public feel about that? When there's a bear asleep in the road on a blind curve? How about when the sheep hang out in the road on Polychrome? Have you EVER followed a caribou in the road? It can set you back as much as 20 minutes in Igloo forest!!! Buses are always going to jam up on occasion. It's the nature of this place. The Park is spontaneous. You cannot plan for that. You can only have guidelines. In regards to hiker wait times, (pg.27 at end of draft), any "flexibility" in bus allocation (TWT vs. transit) could become economically skewed and that is worrisome. This is a road through the wilderness. If you hike away from this road, you are in the wilderness. From a distance, when you look upon the Park road from atop a mountain, you realize how insignificant that ribbon of gravel really is. I also wonder why ANY wild animal in his right mind would choose to hang out by the road at all when there's all that wilderness around. But the option to GET OFF the bus is at stake here. So what if we scare the bears away from the road? They'll still be here, just further away. But confining people to buses is another story. The bears will survive (likely better) if away from the road. Bur people need that sense of wilderness, Even if they don't actually get off the bus, the fact that they could if they wanted to is empowering. We need to protect that impulse to wander. There may only be a minority who want to hike or camp or even just walk along the road, but it's their RIGHT to do so. We are supposed to provide a transit system that allows for that freedom. And on that subject of "comfort" that is referred to in the draft, for those who do not want to get off the bus, the bus ride IS their wilderness adventure. It should feel like a rough bus ride on a rugged, rustic road with character. The perfect Park road experience is one where people leave Denali with a feeling that they went somewhere special. If we just want to herd them in and herd them out and cash our checks and give in to the pressures of an "ailing economy" or the creature comforts of home, then we've failed. Charles Sheldon and Harry Karstens would probably turn in their graves at the thought of selling out Denali. Nowhere in the draft does it talk about strictly reducing our impact on the Park and the wildlife or focus on those moments of solitude the Park can provide. That disappoints me. Yes, I want as many people to see Denali and enjoy it as possible. But NOT at the expense of the wildlife or plants. Not for the love of money. Not to cater to a certain "class" of people. There needs to be a reasonable level of "transit" access to allow for the spirit of adventure that many seek. Everything else is GRAVY!!! Yes the concessioner and the NPS want and need to make money, I do too. But it is our RESPONSIBILITY to think about how we are affecting the Park first and foremost, and then how we are providing access to that wilderness and finally, the visitor experience. Then, and only then, should we be talking about whether or not we want to cram as many people on as many buses as we can and herd them in on tour buses that provide all the comforts of a resort so everyone can make money. Thank You for your time and consideration. please feel free to contact me for any reason with regards to this.

Correspondence ID: 78 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,23,2011 13:48:37
Correspondence Type: Web Form
Correspondence: Wow. I must admit that I'm overwhelmed by the document. It is clearly very thorough, but I was not able to get through the whole thing. I did scan most of it though, reading thoroughly when I felt necessary.

I am a lifelong Alaskan who now lives in Fairbanks. My family uses the Denali bus system at least once a year and sometimes up to three or four visits. I stopped using the bus system for a while when fees were first instituted. I have since come to realize that the park is worth the cost and that it is all right to ask park users pay some of the cost of the system. However, I hope prices do not rise drastically as a result of any of the alternatives. I also hope the Teklanika campground remains open to private vehicles. While drive-in campgrounds tend to draw a higher percentage of obnoxious people (who usually don't realize they are being obnoxious), the convenience factor is high.

We are hikers, backpackers, and cyclists. While we usually use the park campgrounds for camping, we always include off-bus experiences, whether hiking or biking. I strongly believe the access to the park for off-bus experiences should be a priority. I am pleased to see bike racks on the front of some of the buses. I hope more are added to other buses. I also would like people to be allowed some spontaneity with their visits. Pre-booked tours have their place but should not muscle out everyone else.

We have been fairly happy with the current system. We have had problems only once or twice with buses being too full when we wanted to return to our campground after a day of hiking. We have never had to wait more than one bus. Camper buses are awesome. The drivers and riders are almost always fun to ride along with.

I support Alternative A but could also support Alternative C, as both seem to be supportive of off-bus experiences.

Correspondence ID: 79 **Project:** 22494 **Document:** 42309
Received: Sep,25,2011 11:22:25
Correspondence Type: Web Form
Correspondence: pg 11 - the visitor numbers for 2008, 2009, 2010 show a decided dropin visitors, which helps theproblem. with americas current economic crisis showing no signs of stopping, it is clear that low numbers will continue for the next five years. i see no reason to se up a plan to handle high numbers when that issue is not likely to happen. pg 57 - alt c wildife may be able to tolerate iewing, but you need to stop the hunting/trapping and wildlife killing because that is the real way wildlife has to run for its life. they know that when a gun goes off they all scatter. there is no doubtin their minds. pg 75 -hikers may need to make other provisions. the whole system cant be stumped and not

working bedause of 2 hikers. pg 76 large construction vehicles need to be mandated to drive no faster than 25 mph in these areas. pg 91-visitation is declining. keep the current system. cut costs. pg 95 stop allowing shuttle bus riders to get on and off. make them stay on bus for entire trip. pg 99 - backpackers need to do more for themselves and this whole system cant be hurt by the few of them. pg 203 - would like more of the park considered wilderness. pg 36 - appendix - very very old antique bibliogrphy is hardly helpful in planning for future. pg111-park visitors numbers will decline further, not go up. nps has totally wrong projections. using a 2004 plan is outrageously wrong in numbers in 2011 and forward. pg v - no need to count vicitors for next five years. give this plan a 5 year break. stop all the spending in labor costs when they arenot need4ed. an electronic counter could count vehicles rather than paying high priced help to do this.

Correspondence ID: 80 **Project:** 22494 **Document:** 42309
Received: Sep,27,2011 14:51:54
Correspondence Type: Web Form
Correspondence: I think Alternative A is the best solution. I don't see how adding more vehicles and visitors to the park will protect the Park and its animals. The added protections will only be necessary if the visitor use numbers increase. By limiting the number of buses on the road the Park will remain a place for wild animals and wilderness experiences.

Don't be influenced by Park concessions trying to increase profits. Keep the Park wild.

Correspondence ID: 81 **Project:** 22494 **Document:** 42309
Received: Oct,01,2011 17:09:32
Correspondence Type: Web Form
Correspondence: I support the no action alternative (Alternative A) for the Denali Park Road Draft Vehicle Management Plan and Environmental Impact Statement. I support management that has a concrete number for allowable vehicles (over the course of a season) rather than "managing for standards". Measurable indicators and standards need a concrete,set limit that is not left to the Superintendent's discretion. I think the seasonal limit of 10,512 vehicles is too high but preferable to optimizing access or maximizing visitor opportunities. I think the cost of riding a shuttle bus to Eielson or Wonder Lake is way-too-expensive for what should be public transportation. I think the environmental consequences of allowing tours outside of the controlled "limit", such as the Natural History Tour, need to be addressed. The front country congestion is creeping further into the Park and needs to be recognized as impact to wildlife and habitat,the soundscape and ambiance of the wild character of this park and to visitors who seek a less commercial experience of the Park. This park was not set asside to be the economic engine for certain enterprises but to protect wildlife and resources. Way too much emphasis is given to the tour industry for basing management decisions. I support limits that are concrete and measurable in a strict sense by anyone within or outside of the system. The nebulous and subjective verbage of adaptive management to achieve specific desired conditions and the "indicators and standards" language of this document is very concerning as a form of management for the future. No Action is the preferred alternative to all that vaguness.

Correspondence ID: 82 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,01,2011 17:26:48
Correspondence Type: Web Form
Correspondence: DNP Road Plan

My perspective is that of a seasonal employee of Denali National Park, beginning in 1979. I have worked as a driver for the Visitor Transportation System (Shuttle) bus for 29 seasons and have worked on the NPS trail/brush crew for one season.

My overall impression of the Denali Park Road Draft Vehicle Management Plan and Environmental Impact Statement is that the plan is too complex, too complicated, too expensive and not necessary. The current tour and transportation system work very well, as is evidenced by the very high satisfactory ratings they receive from park visitors. It is recognized that the administration at Denali National Park responded to an anticipated need to increase vehicle limits over the 10,512 by ordering this study. As a consequence, changes are going to be proposed and likely implemented.

My suggestions and comments, based on my experiences as a shuttle bus driver for 29 years are as follows.

Keep the shuttle and premium tour systems on separate buses.

Keep the current allocation more heavily in favor of shuttle (transit).

Keep the camper bus system. Do not even consider storing gear on the outside of the bus.

If you must implement an economy tour, the simplest way to do this is to make a packet of interpretive materials available for purchase for people who would like this information. This could be materials that already exist. For example, the Denali Road Guide, the Bird Finding Guide, various field guides and etc. More informational packets could be developed.

Consider expanding the role of park partners to offer economy tours, for example, the Murie Science and Learning Center could expand their offerings. Any economy tour should have a dedicated bus. Do not plan on dropping off economy tour groups to do a group hike and then try to flag down a shuttle bus to board on a space available basis. They must have a bus waiting to continue their tour after their hike.

Currently the positives of the system are: Choice of tours with various destinations. An affordable, reliable and efficient shuttle bus system.

The negatives are: Too long a wait for hikers too often. Drivers record if someone has waited longer than an hour to board a bus, but there is no action taken in response to avoid the situation happening again. The dispatchers at Eielson do an excellent job tracking the number of passengers arriving and departing on each bus and the projected number of passengers arriving later in the day. Based on their observations of the weather and passenger numbers, they have the ability to call in a sweeper bus. Unfortunately, the needed sweeper bus is not always sent which results in longer than an hour wait for people. There must be a requirement in the contract which spells out under what circumstances extra buses will be sent, on a daily basis. We can not have a contract which calls for adjustments in bus numbers and allocations only at the end of the season.

There are not enough seats left open for hikers. Having extra seats open on the buses arriving at Eielson will be even more critical if a portion of the existing shuttle buses become economy tour buses with fewer seats available for hikers. NPS must stipulate the minimum number of empty seats on each transit bus. Currently four seats are left open at the WAC. Those four seats are often filled at Teklanika campground, resulting in no open seats when the buses arrive at Eielson. Please consider requiring a few open seats when departing Teklanika west bound, to allow for Igloo campers and others. Having a few open seats will afford reassurance to folks considering hiking, but deciding against hiking because of the anxiety of not being able to get back on a bus in a timely manner.

These comments for the plans serve as an overview, they are not specific to any listed alternative.

Please consider the option of a Wonder Lake destination for economy tours. Currently the plans call for a WL destination only for premium tours. The destination for the Wonder Lake economy tours and transit buses should be the north end of the lake. Many park visitors are disappointed when their bus turns around at the south end of the lake. Expectations are of the view of the mountain reflecting in the lake, at the north end!

Another concern is that of off the bus experiences for the economy tour. If the economy tour includes a hike, the bus must be able to stay and wait for the group. The transit system would be challenged to pick up even more small groups than it does now.

Mixing premium tours, economy tours and hikers on the same bus, with different assigned seating, would be a source of conflict. We already face the problem of wildly differing expectations on the shuttle bus. One advantage of splitting the shuttle into transit and economy tour would be to let people choose which option best suits them.

Please continue to provide the opportunity for visitors to have a quiet ride, which promotes reflection and self directed experiences. Not every visitor wants or needs interpretation. Some definitely are seeking a quieter ride without continuous commentary.

Please do not promote storing gear on the outside of the bus. The current fleet is totally inadequate for this purpose. Already the bottoms of the bays are weakened by the tire chains. The outside bays are dusty and grungy. They are small. It would be logistically problematic to sort coolers and back packs and cardboard boxes and plastic shopping bags and ice axes and bike trailers into those small bays. Please keep the camper bus concept. It is the best option for campers with gear. If the buses were to be equipped with outside storage, consider the configuration of people standing in the road on Polychrome, sorting through the outside bays to collect their gear. This could result in road blocking and/or creating a hazardous situation. Outside storage is tantamount to road widening. If all the buses were to be equipped with outside storage, the buses would need to park further apart in the rest stop parking areas to allow people to load/unload gear. At peak times of day now we do not have the space needed to park far enough

apart to allow this. This would result in the need to expand the parking lots.

Please recognize what most visitors value: watching wildlife. Having a quality experience includes wildlife viewing. Please write in the contract that there will be adequate extra time in the transit system for wildlife viewing, in other words, recognize that it is not solely a transportation system. Having open seats on the bus also promotes a quality experience. Filling up every seat lessons the opportunity for all to view the wilderness landscape.

Requiring a stop at the visitor center at the entrance for every bus is not necessary. Currently, all TWT buses stop at the Toklat Ranger Contact Station, and every VTS bus stops at either Toklat or the Eielson Visitor Center. People who have been on a bus for 8 to eleven hours do not want to add time to their day, either before or after their trip in the park, by going to another visitor center. They are anticipating their day in the park at the beginning of the trip, and are thinking of their next destination at the end of the day.

Thank you for your consideration,

Correspondence ID: 83 **Project:** 22494 **Document:** 42309
Received: Oct,11,2011 08:27:49
Correspondence Type: Web Form
Correspondence: After reviewing the document and discussing with several of the Professional Photographers on your discussion group, I am disappointed that the Park Service is trying to go forward with this plan, without incorporating the suggestions of the Professional Photographers. To decrease the number of Road Permits for Professional Photographers and increase the permits for buses, especially buses run by tour companies, is a blatant attempt of limiting access for photographers while yielding to the pressure of increasing the number of buses that access the park. AND there is not explanation of how DNP plans to come up with $1million extra dollars that it will take to run Proposal B or Proposal C.

I would have to vote for Proposal A or ask that the DNP take into consideration the proposals from the Pro Photography group that meet with officials about the Proposal. In this age of economic difficulty, it is shameful to see the Park present a plan that is projected to cost $1million more per year than the present plan while affording easier access to private tour companies...

Correspondence ID: 84 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 08:52:01
Correspondence Type: Web Form
Correspondence: I have visited Denali several times in the past and hope to return in the future. Recent changes in the ability of professional photographers to gain access to Denali via the permit system are not acceptable. These photographers provide current images of the Park to US citizens and the world. The change to give the photographer's permits to "for profit" tourist operations does not give the same end results. The Park administration is favoring people with a strong political and profit motive over those who provide a more public minded agenda. Granted, professional photographers are also making a living and have a profit incentive, but not in the same way as the tour operators. Tourist photographs from a crowded bus will not capture the same beauty and special moments that a professional will produce. Giving in to pressure from the tour operators is short sighted and makes all wonder what agreements are being made behind closed doors. Sometimes the right decision does not involve money and profit. The Park administration over the years has made photography in Denali more and more restrictive for various reasons. Seeing nature's beauty by having to sit in a crowded bus and complying to restrictive rules designed to maximize the tour operator's profit line is not acceptable. The Park should serve the individual citizen to maximize their experience in God's outdoor theater. Tour operators serve the needs of many people, but those who want a more personal experience also need to be accommodated. Politics and profit should not have priority in decisions on how Denali is open to the people.

Correspondence ID: 85 **Project:** 22494 **Document:** 42309
Received: Oct,11,2011 09:52:16
Correspondence Type: Web Form
Correspondence: I would like to express my OPPOSITION to this plan to eliminate Photographer Passes and give them to more corporate tour companies. I view this as one more assault on individual citizens abilities to enjoy our natural heritage as our outdoors becomes run by corporations. PLEASE DO NOT ELIMINATE THE PHOTOGRAPHER ROAD PASS PROGRAM AND GIVE IT TO ONE MORE TOUR COMPANY!

Correspondence ID: 86 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 10:56:48
Correspondence Type: Web Form

Correspondence: Phasing out photographer passes and replacing them with tour buses is not in the best public interest. Many of the inspiring images of National Parks that make the public support their protection and expansion were made by individual photographers roaming for these location and creating these images through perseverance and being at the right place at the right time. Replacing this with tour buses that move on a set schedule is not in the best interest of either the NP system or the public.

Correspondence ID: 87 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 11:18:04
Correspondence Type: Web Form
Correspondence: Attn: Miriam Valentine C/O Superintendent Denali National Park and Preserve ATTN: Vehicle Management Plan P.O. Box 588 Talkeetna, AK 99676 October 11th, 2011

Denali Park Road Draft Vehicle Management Plan and Environmental Impact Statement

First off I appreciate the opportunity to provide input to D.P.R. Vehicle Management Plan. Alternative C (which I would categorize as offering more self directed visitation) is the much preferred alternative. Especially the application of a new management zone-Wildlife Viewing Subzone 3 from the Eielson Visitor Center to the Wonder Lake junction. But as I am sure you are aware the bus system capacity of Alternative C, will require daily balancing so as to avoid over capacity, i.e nearly empty buses. So it should be established with flexibility of capacity based on daily demand. The vast majority of visitors likely do not have the time or interest to study the options and choose a significant degree of "self directed" visit. For example the current system and all its features actually has more self directed options than are fully utilized or realized. But formally offering a plan as described in Alternative C will result in more awareness and appreciation and hopefully experience of the Parks true value -- i.e. Wildlands . The Alternative C restrictions on private vehicles (concessionaire, photographer , etc.) should be included in whatever the final decision is.

Some final and more specific thoughts for consideration:

* As busses are aged out and replaced please strive for the quietest technology, for example the loud hiss of the air brake system release is especially , shall we say -- "annoying". And look for the versions of the newest truck engines that have as mush as a 20% gain in efficiency. And perhaps natural gas engines may be an economically viable choice.

* Much the same suggestion (quietest engines and "reverse beepers") is offered as road maintenance and other heavy equipment is aged out and replaced.

* As new busses are added consider specifying a few bus seats, say 4 (2 on each side) , with 3" of additional spacing reserved for folks taller than 6' 3".

* Specify bus window technology that is more conducive to photography , ease of use, and at the same time limit passengers from extending out the window, which tends to further stress wildlife.

* At some future date say effective with 2013 season, discontinue the end of season Road Lottery Program in the interest of wildlife sensitivity and resource requirements. Although there is considerable visitor interest (~10,000 applications for a few hundred passes) the demand on the Park Service personnel and resources is considerable -- i.e cost per visitor served. This at a time of ever decreasing Park Service Budgets. Also the extra stress on wildlife will be reduced which is especially important at the beginning of the harsh winter season.

Hopefully these thoughts are helpful and thanks again for the opportunity to provide input to the planning process.

Correspondence ID: 88 **Project:** 22494 **Document:** 42309
Received: Oct,11,2011 13:01:02
Correspondence Type: Web Form
Correspondence: Please amend your plans to comply with the following federal law. It appears that the park is currently violation this law and said violation should cease. 16 USC Sec. 460l-6d 02/01/2010

Correspondence ID: 89 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 17:12:01
Correspondence Type: Web Form
Correspondence: Like many other photographers, I have been to Denali, the last thing Denali needs in a tour company to be the one who decides on who gets to have the pro photographers

passes.

Please do not allow this happen, keep it as it has been .

Correspondence ID: 90 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 17:22:42
Correspondence Type: Web Form
Correspondence: I'm upset to hear that Denali would pack buses to the hilt and restrict personal driving and more limits with less permits. I was one of the luck ones who got to drive farther in almost 10 years ago when the season was over. It was awesome, and there were not many people. No busses.

I am also upset that you would further limit photography. As technology changes, and newer generations get newer ideas, what better place is there to capture images for this expression? There are never enough photos of this place, and everyone should have the opportunity to get their own. Photographers respect the place for what it is, and we're all trained in leave no trace, and respect the boundaries within nature.

Personal vehicle lotteries are great, but the per car fee should be the one. At $20 that's plenty. You should ask for donations beyond that. The parks are starting to charge more and more, and it's becoming so that ordinary people cannot enojy them. The parks were made for ordinary people. We need to look at ways to get ordinary people to help care for the land that we use instead of preventing them from touching it.

I don't know how to solve the problems of limiting the visitors on the road. I think the lottery was a wonderful idea, and I would stick with it. I would love to take my kids out there someday, and I would hope that we can drive far in the park and take all the beautiful photos that we want to.

Correspondence ID: 91 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 18:13:51
Correspondence Type: Web Form
Correspondence: Dear PEPC representative:

After reviewing the proposals for the road use, I am troubled by the plan to increase the amount of traffic and also doing away with the pro photo pass while allowing more cruise/tour companies access to the park.

One of the most important things about National Parks is preservation, and I have always seen Denali as the star in the system for not allowing the amount and number of buses that occurs elsewhere. I would have expected toe park service to learn from other parks, such as Yosemite, where traffic causes more and more incursion into animal habitat, and greater amount of animal deaths as well as additional pollution and congestion, making it nearly impossible to be able to find the quiet and solitude, or, as a professional photographer, the ability to take photos of the natural areas without interruption.

I have been to Denali twice, and one of the most important things I took away from these visits was the ability to get away from traffic, tours, and to immerse myself in the park. I find wilderness one of the most important things we can preserve, and Denali is at the top of that list.

I hope you will reconsider the pressure to allow more tours, more people on tour buses, and consider the need for the continued preservation of the wilderness and the remote nature of Denali National Park.

Correspondence ID: 92 **Project:** 22494 **Document:** 42309
Received: Oct,11,2011 21:06:05
Correspondence Type: Web Form
Correspondence: What a crying shame that a government organization would give into the whims of commercial enterprises such as tour busess and cruise lines and do away with pro photographer passes to allow those groups to put more wheels in the pavement in one of our national parks. This is extremely disappointing and not in the best interest of the nation, it's citizens or the environment you're tasked with caring for.

The requirement on this form for an organization as a member or official representative is another sign of the sad state of affairs taking place within the National Park

System. Obviously the NPS has little or no interest in hearing comments from "ordinary citizins" of the United States of America.

A sad day indeed.

Correspondence ID: 93 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,12,2011 07:57:14
Correspondence Type: Web Form
Correspondence: It is important that we keep access to the park open to photographers who make these public lands visually accessible to those who cannot visit them. Old photos will not do. Please allow more professional photography permits for access. Thank you.

Correspondence ID: 94 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,12,2011 08:06:48
Correspondence Type: Web Form
Correspondence: As a professional fine art photographer drawing much of my subject matter from our natural surroundings (National Parks) I feel that it is imperative that professional photographers maintain as much access as possible to the Denali Road System. The beauty and detail that professional photographers share with the rest of the world can not be quantified as saying that enough images of a certain subject already exist, therefore, we don't need any more - how completely absurd! I have "never" approached a natural scene and found it to be the same as a previous visit - nature always manages to astound and amaze with its infinite varieties. Please do not bow to the pressure of corporate lobbyist and tour bus companies to steal the already limited access photographers now have on the Denali Road System.

Correspondence ID: 95 **Project:** 22494 **Document:** 42309
Received: Oct,12,2011 08:10:14
Correspondence Type: Web Form
Correspondence: Please work to allow everyone access to the park, photographers & tourists alike, by not rescinding the photography road pass lottery. It seems like a very reasonable compromise to offer give the photographers more passes in off seasons in return for using the high season passes for tourists. I understand the funding issue: It's true that the park will likely make more money from a bus full of tourists than a few photographers, but one of the greatest benefits of the national park system is that access to the areas is not restricted according to who creates the most financial benefit for the park.

Correspondence ID: 96 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,12,2011 10:50:10
Correspondence Type: Web Form
Correspondence: Lets see... You are totally ignoring all input from the public (ProPho) and instead going with what the Cruise lines lobbyist want. At an increased cost of one million more per year when you are faced with budget cuts.

Alternative A, No Action, seems to be the best for regards to your budget and not going 100% corporate at the expense of the tax-paying public.

Correspondence ID: 97 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,12,2011 10:50:31
Correspondence Type: Web Form
Correspondence: I strongly protest the proposed change which would deny individual photographers a road pass. The park is a public place and freedom of expression and travel must be allowed in the park. Favoring busses over individuals with policy is wrong headed and un-American. You are close to Russia, but not part of that country. Free the photographers and the Americans by withdrawing this wrong headed plan.

Correspondence ID: 98 **Project:** 22494 **Document:** 42309
Received: Oct,12,2011 11:06:43
Correspondence Type: Web Form
Correspondence: As a nature photographer, I feel that it is important to keep the number of professional photographer permits that are available for Denali at its current level. Denali is a truly special natural environment. Some have stated that there are already enough images of the park in existence. I strongly disagree with this standing on two major points.

1. Each individual photographer, specifically when it comes to professionals that specialize in nature(the photographers for whom these permits have been set aside), has

their own unique vision and style and typically will strive to shoot from new perspectives while in the park.

2. With the extremely rapid advent of new technology related to digital photography, nature photographers are constantly getting newer and better tools that are increasing the resolution, quality and longevity of photographs. On June 15, 1999, when Nikon came out with its revolutionary 2.7 megapixel, D1 Professional SLR camera, we could not have even dreamed that Hasselblad would release a 50 megapixel camera less than a decade later. With new techniques such as High Dynamic Range(HDR), HD Time Lapse, HDSLR Video, Extreme Low Light(Using very high ISO), Gigapan and Panoramic stitching getting refined on a constant basis, photographers are able to return to places that they have shot numerous times before and always return with new material.

Finally, with climate change threatening to change the look of landscapes across the globe, we should be working to provide more access to nature photographers in order to document the current scenes for historical purposes as well as the changes for scientific purposes.

For the reasons stated above, I strongly urge you to adopt Alternative A. Thank you.

Correspondence ID: 99 **Project:** 22494 **Document:** 42309
Received: Oct,12,2011 13:27:02
Correspondence Type: Web Form
Correspondence: I wish I felt comfortable enough to give you my contact information but not in today's world.

I have visited the park twice in the last five years for a total of 12 days. I spent 8 days in the park this past August, most of it hiking.

I applaud your efforts to maintain the park in its pristine condition while faced with greater demand for access. However, I cannot agree with either alternatives B or C as the relate to professional photographers. Professional photographers can be the collective conscience, helping propagate the soul of an area. I cannot understand how limiting the professional photographer's access to the park benefits Denali. Their footprint is negligible and they are usually more considerate of "critters" than average visitors. If there are problems with individual photographer participants, remove them from the park.

For photogs, maintain the status quo. Allow them to compete for access and capture those memorable images. No, I am not a professional photographer.

Out of curiosity, I took a non-camper bus ride to Eilson in August. It was a memorably bad experience. The driver's underlying concern seemed to be schedule compliance ahead of actually seeing anything or making memories. Additionally, the bus riders' behavior was abysmal around critters. How long has it been since you rode the bus as a "secret" visitor? I'd further argue taking any credible images from a bus is impossible, whether or not it is photo specific bus.

I work for the federal government in my "day job" and I always find it interesting when reasons for limiting access or support are cloaked in the mantra of "..to gain efficiencies in administration and oversight." The statement is frequently an unprovable assertion.

There are still memorable photographs to be taken in Denali, photographs that will stir folk's spirit and provide support for the park. Don't limit that opportunity. This past trip, I witnessed a once in a lifetime event as a single wolf took down a caribou. That is the memory I'll cherish, that is Denali!

Correspondence ID: 100 **Project:** 22494 **Document:** 42309
Received: Oct,12,2011 14:36:41
Correspondence Type: Web Form
Correspondence: I can't imagine why any restrictions on photographers and/or access to this park would be considered as long as no damage was done to the park environment.

Correspondence ID: 101 **Project:** 22494 **Document:** 42309
Received: Oct,12,2011 16:44:59
Correspondence Type: Web Form
Correspondence: Dear sir and/or madam,

I am shocked that the Denali Road plan wants to take away road passes from professional photographers and give them to tour companies to run more buses through the

park. The photographers' road pass should never be discontinued or reduced, especially for the promotion of bus tours. It greatly disturbs me when I hear from photographer Bill Campbell that that at least one park official stated during a teleconference with a Pro Photographer's focus group that he saw no need for photography within the park as there were enough pictures of the park to be used for any needs. That's insane! The new DRAFT DENALI PARK ROAD VEHICLE MANAGEMENT PLAN (DRMP) seems designed to meet tour operators' desires to the detriment to other visitors and it's only advantage is to line the pockets of tour operators. This is wrong. The best course of action; the only course of action is alternative A, no action. Any other option is unfair to America.

Correspondence ID: 102 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,13,2011 10:13:19
Correspondence Type: Web Form
Correspondence: I must be missing something here. Are the National Parks up for sale again? No professional photographers just tour buses? Why? Tell me it isn't so, who's getting their palms greased now? This over the top, is this still the peoples National Parks System here in the USA? What about the pollution from the tour buses? Professional Photographers respect the environment more than the tour bus lobbyist, use plan A. Stopping Pro Photographers from the park, ya, this is a law suite in the making. Get real this isn't a 3rd world country yet.

Correspondence ID: 103 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,13,2011 18:00:55
Correspondence Type: Web Form
Correspondence: Photographers can't shoot from tour busses. They don't usually inter an area at the prime shooting hours, around sunrise and sunset. Often one has to wait for the light, depending on the weather conditions. So shooting with a tour group is out of the question. Therefore you would be taking our individual rights away, not allowing professional photographers to photograph Denali. I sincerely hope you will reconsider your decision to limit travel to tour groups. Even if you are not a photographer. Can you imagine seeing a beautiful park like Denali, from a crowded tour bus?

Correspondence ID: 104 **Project:** 22494 **Document:** 42309
Received: Oct,14,2011 07:01:52
Correspondence Type: Web Form
Correspondence: I am a nature lover and photographer. I spend a week every year or two visiting Denali National Park to observe and photograph plants and animals in the area. It's a wonderful park.

I recognize and value long term planning to address the current and future needs of the park and the people who visit the park. But at the same time, the current proposals disproportionately benefit tour operators while reducing park access to independent photographers and individual park visitors. Therefore Option A - retaining the current system - is the best option. This will allow modifications to proposals B&C to address the lack of access to photographers.

It is not fair for tour operators to have a disproportionate voice. Based on your report, they already represent a large portion of park visitors. Restricting access of photographers and organizing around a system of formal tours will directly benefit the tour operators more than any other group. The group that is most disadvantaged by the proposed changes will be professional photographers through the reduction in permits, and amateur photographers due to the changes in the transportation system.

Serious amateur photographers will have no problem riding buses into the park. They would like to have some limited access by bus or personal vehicle early in the morning or late in the evening. Early morning access could be structured in a manner to reduce vehicle traffic by park employees if such traffic was consolidated with a bus route. Similarly, late evening bus access currently via the "sweeper" but is important and should be continued.

I further understand the need to optimize traffic on the bus system. Optimizing the bus system includes striking a balance between reasonably filling empty bus seats while leaving room for hikers and photographers to get on and off the bus. It also includes having the enough room on the bus to stop for wildlife in order to observe and photograph the animals. A full bus offers a poor experience for photographers, while a bus that is 70-80% full maintains the flexibility to change seats and observe wildlife. I encourage plans to optimize bus service to reserve vacant seats for hikers and to allow improved flexibility for visitors.

If plans B or C are approved, I also urge the park to require tour buses to stop and pick up hikers and photographers at no charge. In many cases with reductions in personal vehicles, provision needs to be made for alternate transportation. These individuals may not want a guided tour but do need transportation without being forced to buy a guided tour.

In the future, it is important that involvement of professional and amateur photographers be included in the development of the plans. While they were notified of the

proposed plans, there is no sign that their comments were included or addressed in the proposals presented.

Correspondence ID: 105 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Planners,

Please accept this letter as comment by the Alaska Quiet Rights Coalition (AQRC) on the Denali Park Road Draft Vehicle Management Plan and EIS.

AQRC is a statewide non-profit organization dedicated to protecting the rights of Alaskans to quiet places for the benefit of public land users, home and cabin owners, communities, businesses, wildlife, visitors, and future generations. We believe that natural quiet and natural sounds should be recognized by public land managers as critical resources o be protected just as any other natural resources such as wildlife and their habitat are protected. Natural quiet is a an essential component of wild habitat.

Denali National Park is the premier National Park in Alaska and perhaps the nation. It should represent the best in resource management that our nation has to offer. We believe that protection of the resource must supersede visitor interest and desires because visitor demands will always increase whereas the resource is finite. We want our great grandchildren to have DNP as it is, even if (especially if) they have to stand in line to appreciate it. AQRC supports efforts to control visitor noise and impacts on wildlife, wherever possible.

1). For that reason, AQRC believes that the 10,512 numerical vehicle limit is essential regardless of what elements of the alternatives are adopted. Although there are many good ideas in the Plan , safeguards against political and corporate pressures are dangerously weakened without a numerical limit. Today's park administration cannot guarantee the responses of tomorrow's administration to the enormous pressures they will have to face from commercial giants and politicians with alternate visions of park use.

2) The possibility of quiet electric buses and trains should continue to be explored.

3) Keep it simple. The proposed alternatives are time and money intensive. In today's economy, NP funds should continue to be used for habitat protection and study. A complicated road vehicle plan is doomed to eventually drain funds from backcountry protection.

Thank you for your work in protecting our National Park and for this opportunity to comment.

Correspondence ID: 106 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: Your 318 page Denali Park Vehicle Management Plan completely overwhelms me. I care deeply about the park and maintaining its wilderness character and integrity, I'm not paid to analyze this document but I will spend the time and effort I can afford giving you feedback. I've worked for the concessionaire for 10 years as a naturalist and TWT interpreter/driver and I will give you my perspective on ways I think you can improve your ability to protect the resources while at the same time provide increased access and visitor satisfaction.

This year I drove 99 trips into park. Every year I average between 90-100 trips and my ridership averages nearly 4000 visitors. Conservatively I estimate I've had over 3000 grizzly bear sightings as well as countless Dall sheep, caribou, moose, wolf, and lynx encounters in all manner of circumstances and situations along the Park Road through the years.

On February 25, 2010 I submitted eight pages of detailed positive suggestions and concerns regarding the Vehicle Management Plan. I stand by those comments. A copy of them is included. Please consider those comments once again.

I realize some of the comments I've made and will make may not fall precisely within the scope of the Park Road Vehicle Management Plan but they are made with an eye on improvement of the whole visitor experience as well as resource protection.

I cannot fully endorse Alternative A, B, or C as a stand-alone alternative. I see parts of each as being important and necessary. However, of the three, I prefer Alternative B the most with modification mentioned in my comments. You will have to decide under which alternative these comments pertain.

Why do people come to Denali? We should never lose sight of the primary reason people come to Denali. They come to see wildlife, principally bears. If they don't see a bear they will be disappointed. Secondly the come to see the mountain. Yest there are other reasons why some people come to Denali. But, by and large, our visitors are not as sophisticates as we might like them to be. I love interpretation and I think I'm pretty good at it. Interpretation is very important in the scheme of helping visitors connect with the resource. But the fact is you can be giving the most compelling interpretative message on a TWT Tour and then have one scraggly female caribou be sighted at 500 yards and completely interrupt and disrupt your message. It happens all the time. Visitors care most about seeing wildlife. We should not get carried away with maximizing visitor opportunities by using too many specific interpretive events. Take for example the Kantishna Experience. You may think visitors choose the KE tour because of the "special" NPS Interpretive Ranger two-hour presentation. They don't. They like the Fanny Quigley story but they don't choose KE as their Denali trip because of it. They choose KE because it goes to the end of the road and it is the most expensive option, therefore it must be the best trip. For those reasons they think it must be the best opportunity to see the most wildlife and get the vest views of the mountain. That's why they choose it.

Expand the season Have you noticed? It's getting warmer and fall is coming later in Denali. When is the last time you hd to shut down the park road for the remainder of the season because of snow? Everyone is asking why do they close the park so early? Please consider expanding the season for ten days to two weeks beyond the traditional closing of the Teklanika gate. There are always ways to deal with the Park Road lottery. Please see my comments on February 25, 2010 in the attached document.

DVC to Savage River Check Station I would like to see vehicle access controlled on the section of the park road from DVC to Savage River. I address that issue on page 2-1 of my February 25, 2010 comments. Moose and bear sightings along this section of the road are frequent and often provoke traffic jams and irregular visitor behavior in violation of park wildlife viewing rules. The paved section of the park road is one of the worst sections for bus/auto bunching up, blocking traffic, and negatively affecting wildlife. I like the idea of changing the entrance fee structure to $10 per person from the $20 per family option. Why note use it as a way to promote free, narrated Savage River Shuttle type trips as previously suggested.

Savage River Check Station Representatives The quality of the interaction by NPS representatives at the Savage River Check Station needs to be upgraded. This is very important way for NPS to interact with park visitors as well as work together with naturalist drivers.

Instead of an attempt by NPS in the Savage River Check Box at an interpretive talk, which is often long-winded and disjointed, I would like to see the following:

I suggest a strong short welcome statement and thank you for visiting and supporting your national parks. Then, give a brief statement about NPS's responsibility to preserve and protect the resources while at the same time providing the same resources for their enjoyment and benefit.

Say something along the lines: Therefore as you explore this national park on your trip today, we ask for your help and support in keeping Denali the way you will find it. Help us keep wildlife wild by never approaching or feeding wildlife. We ask that you use the trashbags on the bus and pack out everything we bring in. We ask you be careful with food and crumbs and follow your driver's suggestions. When and if you have wildlife sightings, please keep your heads and arms inside the bus, lower your voices, and sometimes be absolutely silent when you see wildlife. Your naturalist/driver will tell you more on your trip. We hope you have a great wilderness experience. Again, thank you for your support.

A uniformed person reinforces what we, as naturalist drivers, are already communicating about park guidelines. Please leave the interpretive part to us. The Savage Rangers have limited time on the bus to interact with the guests. Trying to give an interpretive message only unduly lengthens their talk and diminishes the importance of heir welcome message and guidelines statement.

Special Needs and Foreign Language Groups Presently there is no transportation provision to accommodate special needs groups nor is there any mention of it in the alternatives of he Park Road Vehicle Management Plan. These groups would include but not limited to foreign language groups (German, Italian, and especially Japanese), Australian groups and RV Caravan groups. These groups want two things: an exclusive bus for only their group and an economy tour somewhat between a TWT and a VTS trip. They can't take a VTS trip because their group number exceeds the reservation limit and they need to be picked up at their hotel as well as there is no translation option. They book TWT tours because those needs are addressed. However, the concessionaire does not give them an exclusive bus and fills the remaining seats with other English speaking Americans. It is not uncommon to have 30 to 40 Japanese and 20-30 non-Japanese. This is not fair to the English speaking visitors because the Interpretive aspect of the tour is adversely impacted and greatly diminished as well as it makes the non-English speaking foreign folks feel uncomfortable to be paired with others not of their

group. Culturally, foreign groups prefer to be exclusive.

Bus Capacity, Equipment, and Other Issues Please require buses used for premium tours to meet higher standards for the following: 1. Stop packing visitors into buses like sardines. Reduce seating from 52 to 48 to provide more leg room. 2. Reduce mechanical breakdowns by addressing the causes (mud and dust, delayed and deferred maintenance) and facilitate rescue situations. 3. Solve muddy outside window issues and inside fogging of windows. 4. Provide space in side of bus for the video camera, trash bag, food and condiments, recycling, driver leg room and driver personal items. 5. Provide a functioning kneeling option or use step stools for ease of boarding. 6. Maintain a functioning and efficient driver and passenger heating system. 7. Solve the issue regarding providing hot drinks and the quality level of snack lunch boxes. See attached comments dated October 15. 2010. 8. Sop commercializing the tour. Utilizing video screens with a high powered spotting device is an excellent tool for helping visitors see and find wildlife. Why are we selling Windows into the Wilderness DVDs for $39.95 when Alaska Geographic offers "Heartbeats of Denali" and "Winter Patrol" and "Alaska's Wild Denali" for $14.95 each?

Bus spacing The main reason buses bunch up at wildlife stops is because TWT tours are scheduled for departures every 10 minutes from the hotels. If there is a delay, which there often is, i boarding or mechanical issues with the bus during pre-trip, we will be bunched up. During the 7-9am departure times you have TWT, KE, DBL, Roadhouse, and VTS departures. Is there any wonder why we get bunched up?

The hotels want their passengers to return early so they can sell the guests more activities, etc. Departures must be spaced more evenly throughout the day. This must be mandated by NPS, please.

I appreciate and welcome the wildlife studies you have done evaluating vehicle impact on their behavior. However, as far as I know and understand sheep spacing studies don't take into account sheep on Polychrome. If you haven' noticed, the herd of about 15 rams that have hung out on Polychrome for last few years, especially this last year (2011), and have not been bothered in the least by any vehicular activity. In fact, it seems the sheep take great pleasure in completely blocking the road for 10-30 minutes at a time. In addition, those sheep very often spend a great deal of time on the edges of the road resting and grazing while we carefully creep by so as not to disturb them.

Vehicle Numbers As necessary, please increase the number of buses to accommodate visitor park access while at the same time doing everything to reduce the number of non-bus vehicular numbers accessing the Park Road. Please reduce, restrict or eliminate construction/contractor vehicles, NPS employee vehicles, Kantishna access vehicles, professional photographer/artist vehicles, and Teklanika campground vehicles. As much as possible, these drivers and passengers should ll use the VTS shuttle service. That is what the shuttle system is for, isn't it?

DNHT and TWT Tour Lengths and Destinations Please lengthen the DNHT tour to a 5-6 hour trip and change the destination to Teklanika. Please lengthen the TWT tour to a 8-9 hour trip and change the destination to Eielson Visitor Center beginning June 1st. Allow the TWT tour to go to Stony Hill beginning May 20th. Eliminate Toklat as the advertised destination.

VTS Shuttle Quality VTS shuttles are advertised as providing simple access into the park without interpretation. However, there is substantial disparity and variability depending upon the VTS driver.

The Denali NPS website says "All shuttle buses, regardless of destination, are designed to move people around within the park. Shuttles make regular restroom stops and wildlife-viewing stops, just like the tour buses. Trips on the shuttle buses are informal. The drivers provide basic park and safety information, assist you in spotting wildlife along the road and answer uestions, and make restroom stops - but they do not provide formal narration."

Please standardize what a VS driver can and cannot say regarding narration. Limit informal narration to answering questions that have been asked by visitors and a basic standardized outline. Emphasize friendly customer relations and a willingness to answer, in a positive and uplifting manner, any question a visitor may ask. All VTS drivers should be knowledgeable about the Park. Mandate basic information requirements as a component of training regarding information in Alpenglow, the Park Fact Sheet, Wildlife Facts Sheet, all bus schedules (FCSS, VTS, KE, DNHT, and TWT), campgrounds, Dog Demos, WAC, DVC, and EVC facilities and hours, rest-stop usage and required announcements.

Recognize and Reward Driving and Interpretation as Separate Job Responsibilities. Being a professional as a KE, TWT, or DNHT park road naturalist requires skill and proficiency in two jobs - driving and interpretation. Presently driver naturalists are compensated for only one job - driving. Becoming a Certified (CIG) Interpretive Guide adds only $1.00 per hour to the driving salary. In order to improve the quality of interpretation, adequate compensation for interpretation needs to be addressed. In the next

concession contract I highly recommend NPS stipulate that driving and interpretation be recognized as two distinct jobs and compensated accordingly. Please see additional commentary in attached February 25, 2010 Workbook Comments, page 6.

Correspondence ID: 107 **Project:** 22494 **Document:** 42309
Received: Sep,07,2011 00:00:00
Correspondence Type: Transcript
Correspondence: My main comment is that I want the rural character of the road to be preserved. It's a wilderness road and I hope that it stays that way. And I -- you know, I think about Adolph Murie who was one of the park's first scientists and he really felt that it was a special place because it was so hard to get to. And the road keeps that beauty in tact.

I'm also -- and my other main comment was about visitor access. I know I've had friends that have come up to Denali and when you look on the Web site it's very, very difficult to figure out the visitor transportation system, what they call VTS. It's almost like you are forced to look at the expensive tours even from the Web site.

And I would really like the basic visitor transportation system to be better advertised and better known even renamed perhaps because you have to basically know it's called VTS in order to look it up and get -- to be able to buy a ticket. And those tickets are pretty expensive. You know, for a family of four it's still an expensive trip to come into Denali and that worries me.

Correspondence ID: 108 **Project:** 22494 **Document:** 42309
Received: Aug,23,2011 00:00:00
Correspondence Type: Transcript
Correspondence: I've been driving the Natural History Tour in the Park for the last nine years. I've been driving the Kantishna Experience for the last four or five years, which goes to the end of the road. And no matter which plan we go with, we need to spread the buses out. The hotels, the ones that book most of the tours, the cruise companies, have overloaded the morning tours. In DNHT, we can have up to 15 tours in the morning and just 3 or 4 in the afternoon. On the Tundra Wilderness Tours, there can be 25, 30 tours and all but 3 or 4 of them are in the morning, spaced no more than five or ten minutes apart. And with the amount of daylight that we have in our summer, there's no reason for this. The more the buses are spread out, the better the animal sightings would be, the better the experience for everybody would be. On an excellent animal sighting, the way things are today in the morning, five or six buses could be backed up and that's to nobody's advantage.

Correspondence ID: 109 **Project:** 22494 **Document:** 42309
Received: Aug,23,2011 00:00:00
Correspondence Type: Transcript
Correspondence: Well, my concern is the visitor transportation system. I dispatched for Aramark for seven years out of the Eielson visitor's center, and I know that there were several occasions where people had to wait for more than three hours to be able to catch a bus back to the east entrance. And I'm thinking that unless that is improved, that part of the plans, that just putting on more tours is not going to work; that there are still going to be people out there -- in fact, there are still people out there that are having to wait more than three hours to catch a bus because when the buses come back through, they're full. And if they're out there on the roads, then they run the risk of having hypothermia. And that's my concern.

Correspondence ID: 110 **Project:** 22494 **Document:** 42309
Received: Aug,23,2011 00:00:00
Correspondence Type: Transcript
Correspondence: Given the length of the documents and its complexity, I ask that the comment period be 8 extended an additional 60 days. The document is very impressive. Has it been peer reviewed outside of NPS? Has the Union of Concerned Scientists or another organization actually reviewed it and confirmed that the science is sound? I would encourage NPS to implement the adaptive management under a hard limit within the 10,512, counting all buses that proceed beyond Primrose in that number. Any premium tour that goes to Teklanika should be on an on-demand basis, not prebooked by package tour operators. In the event that any intentionally false data were provided by the MDTs, how can your analysis screen that out? Have you anticipated that as a possibility? And what remedial measures do you have to deal with that potentiality? Does NPS see a potential conflict of interest when the concessionaire installs and maintains the fleet management devices and the MDT panels? Since the information gathered by these panels will be used in determining whether or not you have achieved your standards and indicators, do you not see that there could be a conflict when they're maintained by your concessionaire?

I'm opposed to repeated GPS collaring of wildlife for the BACI studies. I don't support the idea that bears and Dall sheep should repeatedly be collared. I think that we can come up with another solution to gather the data that we need without sedating those animals or collaring them.

And although I understand how the standards and indicators will manage buses through the Savage Check Station, I do believe, as I said in my comments for 1997 Road Corridor Concept Plan, that we should have hourly limits for buses through the box.

I don't support premium tours with a destination of Teklanika, but as I have said before, if they do occur, they should be on an on-demand -- people should make that decision when they're at the Park; they should not be prebooked. Primrose is a preferable destination because the views are sweeping. Teklanika's deck has very limited visibility; the spruce trees crowd the deck and it's difficult even today with the number of buses that are there for folks to enjoy the view. I would encourage the consideration of the removal of some spruce trees around the Teklanika deck. I don't believe that premium tours should be picking up hikers returning eastbound. I think that can be very disruptive to a cohesive tour. I understand NPS' desire for visitors to have access to a visitor center, but rather than including them in the tour, I would encourage NPS to do what they can to see that tour operators have visitors here for two consecutive nights or longer and that allows the visitor, as they are autonomous, to make way their way to the visitor center.

And, finally, I believe that premium tours need premium buses. The HDX buses that we currently have for Tundra Wilderness Tour are the best buses we have ever had for the tour product with the engine at the back of the bus. It makes it possible for spontaneous communication continuously with the visitors on the bus. The replacement buses that had been purchased in 2011 return with engine at the front and it greatly degrades the premium character of the Tundra Wilderness Tour. Although that is outside the purview of this document, it certainly has a place in the prospectus for the renewal of the concession contract.

Correspondence ID: 111 **Project:** 22494 **Document:** 42309
Received: Sep,10,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am greatly concerned about the direction the Vehicle Management Plan is taking. The current approach has evolved over many years of visitor comments, needs, and the desire to protect the Park's resources for the enjoyment of future generations. Many of the "new" ideas in Alternatives B & C such as the transit bus system between Eielson and Wonder Lake, have been tried in the past and discarded as unworkable.

The 10512 limit may not be perfect, excluding NPS maintenance and contractors but it is workable and necessary. The layers of monitoring in Alternatives B & C, are not as accurate or effective and the additional $1,000,000 cost per season is not necessary, defensible, or sustainable in light of our current economy and government deficits. There is n guarantee of protection in Alternatives B & C only a guarantee to be able to increase buses by 8-14%.

Changing the Denali Natural History Tour to a Teklanika Tour is solely the result of pressure from industrial tourism, revenue driven and not of benefit to the Park visitors or resources. The new Teklanika rest stop is already over crowded mornings and mid-afternoons. Having Tek Tours is a bad idea.

I therefore, prefer Alternative A, no change.

Correspondence ID: 112 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,14,2011 18:12:40
Correspondence Type: Web Form
Correspondence: Given that one of the primary goals of the VMP is "pro-active, transparent management", there seems to be a lack of discussion of what the management plan is for accommodating visitors and allowing use of the road during the shoulder seasons in spring and fall. It should be explicit in all alternatives what the operating dates for vehicles on the park road are set for concession services to ensure there is not incremental, unmanaged growth outside the summer period addressed in the VMP.

I recognize why no maximum capacity was put forth in either Alternative B or C. However, a deadline should be included in both alternatives B and C to develop and establish a maximum vehicle capacity to be determined from BACI studies within 5 years. The park can use the data it collects within these 5 years to then ensure that there will not be a continual and incremental increase in negative impact on park resources, which the park is charged to protect. BACI studies should then continue to be done and re-visited from year to year to ensure that this new maximum is not detrimental to the park resources. In this way, the balance between protecting resources and providing for visitor opportunity that the National Park Service mission tries to achieve can be better accomplished.

In the current plan, leaving the decision up to one person (in this case, whomever is Superintendent at the time) to decide upon the capacity of vehicles from year to year as the BACI studies are evaluated is unsettling. At a minimum, this discretion should be made by a panel of staff which represents all park divisions that can discuss and evaluate the impacts given their specialties, from wildlife to concessions to wilderness. Ideally this panel will come up with a maximum vehicle capacity not to be exceeded during different times of road use, as opposed to a maximum capacity for the whole summer (e.g. spring, early summer, peak summer, late summer, fall). I find it

disappointing that all of the alternatives have adverse impacts on wildlife and wilderness since these special characteristics are some of the primary reasons people come to visit Denali. One of the alternatives should reflect a decrease in these impacts.

Construction vehicles of any type, during any time have the potential to impact park resources and the visitor's experience (especially backcountry users at night) and should be more directly and explicitly managed through the plan in all alternatives. Some of the easiest, most accessible, most stunning day- hiking from the road is between Toklat and Eielson. Alternatives that allow visitors to access this area in one day should be taken into account. However, any increase in traffic between Teklanika and Eielson will diminish the experience of those that are going into a wilderness area to experience solitude. An increase of volume in this area in Alternative C would be adversely impact those visitors.

In Alternative C, the management of vehicles entering from and returning to Kantishna to reduce the numbers in the to-be- established wildlife viewing zone is not addressed. Park management and operations would be affected by increasing the need for more law enforcement to adequately limit vehicles to this area.

Correspondence ID: 113 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,14,2011 18:53:34
Correspondence Type: Web Form
Correspondence: The alternatives proposed do not reflect the purpose of the EIS. The EIS is being done in order to increase vehicles on the park road. The alternatives are all fluff about bird watching tours versus filling up buses. Real alternatives would have presented different options for increasing vehicle traffic on the road. For example, options for increasing traffic on the park road include: 1) extend operating season, 2) allow west end employees the opportunity to take their car into the park ONCE to bring in their initial belongings with all other trips for supplies being made on the VTS or an employee transportation system. Allow employees to place orders at grocery stores and have it transported to Toklat or wherever they reside.

There is no reason to allow the travel industry to dictate park service policy. If they want more visitors in the park they can put them on VTS buses.

Birdwatching tours, kid friendly buses, and other fluff ideas presented in Alternative 3 can be implemented under the current system. The same with packing buses full proposed in Alternative 2. Therefore, the NPS has NOT presented any viable alternatives and is ONLY interested in increasing buses through an overly complicated and expensive monitoring system.

I believe the current system is the best option. Furthermore, the current system should account for all of those DNHT tours that travel past Savage. NPS is currently breaking the regulation it created itself. DNHT and contractor vehicles are on the park road and are not counted? Who decided that was OK?

This EIS has gotten out of hand. NPS isn't really trying to improve the system. The system isn't broken. NPS is only trying to increase the number of vehicles on the road. Period.

What is wrong with having a limit? If the Statue of Liberty received pressure from tour agencies to allow more visitors, what would they do? Would they build another Statue of Liberty and allow more people to go to the fake one? Would they increase the size of the island to accommodate more people but not allow them to get as close to it? Would they just have visitors ride by on boats and let the captain zoom in with a video camera and allow the visitors to take home a commemorative DVD?

Denali is a special place because of the wildlife. Not because of the mountain or the road. The wildlife is why people come from around the world to visit Denali. Adding more vehicles to the road does nothing to protect the resource.

Correspondence ID: 114 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,15,2011 08:40:01
Correspondence Type: Web Form
Correspondence: I reviewed the detailed and thorough Vehicle Management Plan and am happy to find that such effort has gone into improving what was the only aspect of my trip to Denali that wasn't exceptional.

When traveling on a full or nearly full bus for the time required in the vastness of the park my enjoyment of the experience was diminished. Balancing optimization of capacity with space for people and a backpack is an important consideration for me. The camper buses were delightful compared to the standard passenger busses. External

storage for backpacks I do not believe would be a good experience.

The bus drivers were fun, knowledgable and added to my understanding and appreciation of the park's landscape and wildlife.

I support Alternative A.

Correspondence ID: 115 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,16,2011 12:24:50
Correspondence Type: Web Form
Correspondence: October 16, 2011

Denali Park Planning P.O. Box 9 Denali Park, AK 99755

Dear Planners:

I think Proposal A along with a continuation of the current vehicle cap of 10,512 is the best option to protect Park values and keep costs down. Keeping the vehicle limit is vital to road safety, air quality, wildlife protection, and maintaining a quality experience. There are too many people wanting access and it is a simple fact that the Park cannot accommodate everyone. A limit is necessary to protect the Park. Maybe a new system for managing the vehicles is necessary, I don't know, but like many fragile things, we have to limit use to protect it. Maybe it is time to develop non-polluting ways to visit the park, like electric conveyances, even a rail system along the road.

There may be some tweaking that would make things run more smoothly and maybe getting together an experienced group of people who have worked in the park along with some frequent visitors that could examine the current transportation and see what adjustments might make it better. From my personal experience the best part of the transportation system was the yellow buses that gave visitors the freedom to get on and off with gear throughout the Park. The tours were too regimented for hikers and backpackers, but maybe a good experience for those visiting on guided tours.

So bottom line, stay with Plan A and the vehicle cap, a cost effective, simple plan that seems to have worked fairly well for a long time. Funding is tight and likely to get tighter. Don't do a bunch of grandiose transportation schemes that are going to be too complicated and costly to manage. The bulk of Park money needs to stay with the core mission to protect the habitat, continue wildlife research, and provide a good, educational, and enjoyable experience for visitors.

Correspondence ID: 116 **Project:** 22494 **Document:** 42309
Received: Oct,16,2011 22:43:36
Correspondence Type: Web Form
Correspondence: I propose NO CHANGES. Thank you

Correspondence ID: 117 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,16,2011 22:45:06
Correspondence Type: Web Form
Correspondence: There sould be no change to the current Denali Vehicle Management Plan.As the options given in the draft plan are favoring the large scale comercial uses of the park and restricting the private vehicle access of the park.

Correspondence ID: 118 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,16,2011 22:45:25
Correspondence Type: Web Form
Correspondence: As an Alaskan, and as a park user who has visited Denali on many occasions dating back to 1991, I am disappointed by the options presented in the draft vehicle management plan. The shuttle program as it is currently run is sufficient. No additional vehicle traffic is necessary. To the contrary, any increase in traffic on the park road could only negatively impact the environment around the road corridor. From my first visit as a child to my most recent visit in September of 2011, I have been amazed at the steady increase in commercial traffic, from tour buses that stop at Eielson or Teklanika to those that continue all the way to Kantishna. Denali National Park is not a designated wilderness. That does not mean it should be subject to the same degradation that many other remote road locations have in Alaska. The strip of highway outside the park known without affection as "Glitter Gulch" is an example of where this slippery slope leads. Denali National Park should not be as accessible as Disney World;

people should have to prepare well in advance to go there. This will enhance safety for those attempting the backcountry and prevent the experience of simply entering the park from being cheapened by easy accessibility. Please, whatever the solution, do not increase traffic within the park.

Correspondence ID: 119 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,16,2011 23:05:15
Correspondence Type: Web Form
Correspondence: As a 34-year resident of Alaska, I enjoy visiting Denali National Park including camping at Savage and Wonder Lake Campgrounds, hiking along the road, and using the green buses. Allowing more tour company ridership and bus access would significantly and negatively impact the visitor experience of this beautiful, vast, and wild ecosystem.

I support the NO ACTION Alternative A. I am opposed to increased tour company ridership and bus access, reduced time spent at wildlife stops, scenic areas, and rest areas. I am opposed to the expensive bureaucracy required to monitor Alternatives B and C.

I support a specific and finite cap on road traffic to protect the resources for future generations. I do not support increasing the number of buses.

I support allowing private vehicle access to Teklanika Campground including the use of motor homes (with restrictions on generator use).

I support allowing the green buses to travel at less than 100% capacity to allow visitors to easily get off to walk along the road or hike in the backcountry and then get back on. It is a phenomenal experience to feel "alone" in the wilderness, but knowing a reliable green bus will be along in 20-30 minutes if needed.

I support the comments provided by Tom Walker in the October 16, 2011 Anchorage Daily News, < http://www.adn.com/2011/10/16/2123596/alaskans-need-to-comment-on-denali.html>.

Thank you for this opportunity to comment. I am withholding my name and email address as noted to ensure my privacy.

Correspondence ID: 120 **Project:** 22494 **Document:** 42309
Received: Oct,16,2011 23:51:24
Correspondence Type: Web Form
Correspondence: Plan A

Correspondence ID: 121 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 02:34:50
Correspondence Type: Web Form
Correspondence: I would like to see Plan A (No change) become the plan for the future. This park should be available to all its citizens, and the plan currently in place does that the best. Do not give in to Tour Bus operators because more buses at the expense of the private citizen is wrong! I live in Alaska and love the opportunity that Denali affords my family. Please don't take that from us. Leave things as they are.

Correspondence ID: 122 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 07:12:44
Correspondence Type: Web Form
Correspondence: After reading and reviewing the Denali Draft Vehicle Management Plan, it appears that none of the alternatives of the plan accomodates the individual viaitor and is strongly biased in favor of your consessionaires and sub-contractors. This will make visiting Denali a crowded "cattle car" experience and reduce or eliminate the opportunity for the elderly, disabled and crowd-averse visitor to experience Denali firsthand, this will become a thing of the past. The ability to view wildlife and the natural beauty of Denali has been a singular high point of my Denali visits which have been made in solitude and at the pace I would like to maintain, these will become a thing of the past. I am disappointed and encourage you to re-think and revise your plan. Knowing the Park Service personnel at WEAR and AKRO, who are singularly talented and caring public servants, this is simply not the best the Park Service can do and is heavily influenced by the commercial interests of your vendors and tour operators. Please start over again and, this time, think outside the box and from the perspective of the individual visitor. Thank you.

Correspondence ID: 123 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 07:33:35

Correspondence Type: Web Form
Correspondence: I support Alternative A as the least restrictive to Alaskans and senior citizens wishing to visit our wonderful resource. Thank you.

Correspondence ID: 124 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 08:54:39
Correspondence Type: Web Form
Correspondence: My vote is for alternative A (leave it alone) Denali Park should available to everyone and not become a slave to greedy, for profit tourist companies. Thank you

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Correspondence ID: 125 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 09:05:22
Correspondence Type: Web Form
Correspondence: I support alternative "A" Thanks,

Correspondence ID: 126 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 09:17:44
Correspondence Type: Web Form
Correspondence: Alternative A (No Action)is the only really fair viable option in this document. Looking at the cost of my last trip to the park and the number of people trying to view it at any given time. It is obvious that adding more buses is not really an answer. Adding more hours may seem viable but it is a full day to do the round trip to the end of the road. There will come a time when access will need to be restricted in a manner similar to the annual lottery to be able to drive into the park. It may end up being the only viable way to control visitor numbers. And to stop the scalping that the lottery brings match names to the tickets. Making short term changes to allow more tourists. Or allowing the cruise companies to block out time in any manner would be against the interests of the general traveling public, and the park. Either look to alternatives that improve the experience with out increasing the cost or make no changes until such a plan has been devised.

Correspondence ID: 127 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 10:13:26
Correspondence Type: Web Form
Correspondence: We have enjoyed the Park since 1971 and have witnessed the many changes, some degraded the experience and others enhanced enjoyment. Of the proposed changes the direction the proposals take is clearly further degradation. The only alternative that keeps with the overriding intent and purpose for creation of the Park and retains the most opportunity for appreciation and enjoyment is Alternative A (No Action).

Correspondence ID: 128 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 10:26:27
Correspondence Type: Web Form
Correspondence: I have worked in the Park as a heatlh care provider part-time and have noted the increase in visitors and tourists since 2005. I believe increasing vehicle traffic will negatively affect not only wildlife but the experience of others enjoying park attributes. I have noted that the tour companies are VERY driven to increase revenue at the expense of elders health and well being. The push to move as many people as possible with a very short time-lined schedule for rest has negatively affected tourist health and personal experience. (Something many would not be aware of.) I do not agree we should change the impact on our park to support corporate objectives. If any change should occur it should be separation from the regular visitor experence. In other words I would not want to be on a crowded bus that has a tourist deadline wisking us from place to place. In the past I have been informed the experience was much more laid-back with bus drivers able to make longer stops in order to allow the quality in viewing wildlife. I have also heard this is becoming less likely as tourists need to meet scheduled appointments and activities. I propose a total separation of these corporate trips from the regular hikers and riders. As these would increase dust and cause disturbance I propose these large "pressure scheduled" buses not be increased or allowed to further clog the already maximized bus traffic. Until either another road is established to provide this separation or corporate greed is reigned in I am in favor of Proposal A, no change in our current traffic. Thank you,

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Correspondence ID: 129 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 10:46:02
Correspondence Type: Web Form
Correspondence: I would like to oppose the vehicle transportation plan as is now proposed. I think it will deter from the private individual's enjoyment of the Park. It may be that the future of the Park may need to be addressed, but this plan is NOT going in the right direction. All parks in the United States should be directed to the enjoyment of the private individuals, United States citizens, who frequent the parks. As I view the present presentation, it favors the large companies. I do not think that they should dictate the policies of our national parks.

Correspondence ID: 130 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 10:56:21
Correspondence Type: Web Form
Correspondence: Dear Sir/Madam: I've been a full-time Alaska resident since 1970, when I opened the first "Molly Hootch" federally-mandated local high school in Savoonga, Alaska. I still have "super-8" films of my first Denali trip in the 60's when as a young man, I carried three spare tires for my old car, and had, of course 4 flats on the old dirt road.. but as I was walking and dolling one flat, I was picked up by an older gentleman in a pickup who turned out to be Lt. Governor Lowell Thomas.. He and Denali changed the direction of my life.. and I remain here still today.

My favorite Alaska "section" used to be the Panhandle, i the 70's - but I watched as corporate tourism, "took over for 6 months a year with sidewalks and streets crammed with cruise ship refugees 24-7, to the point where residents don't even try to visit their own town anymore; where helicopters loudly fly low overhead, intruding into every possible place of potential solitude and quiet;where hiking spots and fishing holes are overwhelmed by noisy,litter-creating, destructive quick-in-and-out, all-day-long, habitat destructive, quick-buck operators, who give large political donations to influence Park and community policy.

I do NOT support enhancing corporate access to the detriment of everyone else who is not politically powerful or potent.. It has happened again and again here, because we are an easy-going, accepting people. .. But not this time. I support Option A and option A only- the "No Action" alternative. Both other alternatives increase will lead to increased traffic, which degrades the experience; increased federal costs to the benefit only of politically powerful tourism corporations; and increase burdens on independent senior visitors who would be forced to "tent-camp".. Not wise in a time when the national median age is continually rising and median income is stagnant. I totally support Option A!

Correspondence ID: 131 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 12:11:04
Correspondence Type: Web Form
Correspondence: I am celebrating my 21 years in Alaska this month. Since my first trip to Denali 20 years ago and my last trip two years ago I have seen enormous change and it is not for the better. It is so commercialized that the point of the visit is almost lost. I support the plan that says don't add more. I do not begrudge the tourist their desire to visit, I'm a tourist too when I go there. I do dislike the tour operators that take over the experience and the benefit to our State is miniscule compared to the benefit to the tour operators.

This Alaska resident supports Plan A.

Correspondence ID: 132 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 12:17:19
Correspondence Type: Web Form
Correspondence: As an Alaskan resident, I strongly favor Alternative A, which in effect would leave the transportation system with Denali National Park as is. I DO NOT want the park opened to increased numbers of commercial tour busses. Under the current system, I can ride the shuttle bus into the Park and get out at any point and hike for awhile or shoot photography at my leisure, then catch another bus. The spacing of the current bus schedule affords me periods of absolute quiet even if I stay on the Park Road. This would be lost if additional bus traffic was allowed.

Please keep Denali National Park unique. Do not turn the Park Road into a bumper to bumper bus roadeo.

Correspondence ID: 133 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 12:30:09
Correspondence Type: Web Form
Correspondence: Do Not change the current system of transportation into Denali Park. Stay with Plan "A" (no changes)

Correspondence ID: 134 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 12:30:23
Correspondence Type: Web Form
Correspondence: I can only support Alternative A (No Action).

Correspondence ID: 135 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 12:40:42

Correspondence Type: Web Form
Correspondence: I support Alaternative A (no action) because none of the draft plans offered increases individual ridership ? and therefore individual access ? into Denali.

Alternative B and C restrict road access for individuals by limiting time at stops inside Denali to observe wildlife or just for scenic stops. The plan increases opportunities for the large tour operators at the expense of Alaskans' opportunities to Denali. Additionally, the second and third alternatives allow more people to be packed into tour bus ? the only way to see more of the park ? and if you've ever ridden these tour buses you know unpleasant the experience can be when they are fully packed. Additionally the second and third alternatives cost more and require more bureaucracy.

The shuttle buses into Denali used to be free, an arrangement that grew out of an agreement that if we give up unlimited personal vehicle access we would get free shuttle service. That agreement of course has not been kept. Not only do we pay, the tour buses are expensive.

For these reasons, I support Alternative A ? No action. This road plan needs more work. Keep it simple; keep the park accessible to all, including Alaskans.

Correspondence ID: 136 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 12:53:22
Correspondence Type: Web Form
Correspondence: I am against changes to the current park operating procedures. I do not like the limits imposed on Alaskans, the increase in costs, and the potential for future hidden changes that usually come with new regulations. I am still upset that we gave up our rights to drive into the park, and that we have to pay for the bus system.

Please do not impose more restrictions on our access to these public lands. The park experience has been tainted enough with the overwhelming presence of the big cruise companies, and the tax implications imposed on businesses formulating hiring practices.

Correspondence ID: 137 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 13:08:32
Correspondence Type: Web Form
Correspondence: I have traveled into the Park with my family prior to and after the use of shuttle bus transportation. I have been very satisfied with our Park experiences and copmplement the Park Service for their management. I do not favor either the Alternative B or Alternative C plans as suggested in the Draft Denali Park Road Management Plan. I can only support Alternative Plan A. In other words, leave it as it is. Thank you.

Correspondence ID: 138 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: Public has input into the Denali Road Management Plan;? True or False?

Does anyone actually believe that NPS is conducting a legitimate 'public comment' process? Our National Park Service is violating the public input requirement regarding the Denali Road Management Plan. It is an example of what former Secretary of the Interior Cecil Andrus, in describing still another taking of private property by NPS, refers to in his recent 9-19-11 letter to current Secretary of the Interior Salazar. Secretary Andrus identifies the NPS, "...abiding cultural disregard for the law even to the extent of ignoring specific instructions from Congress."

It works for NPS. First, NPS sets up false criteria for the public to comment on. Even the village idiot realizes that looping the existing road would double the traffic capacity and open up more than the very tiny percentage of Denali Park which is now accessible. But such an obvious option is off the table for public consideration. Secretary Andrus dubs this pattern of NPS arrogance as the, "?high-handed behavior too many regional and state NPS directors have exhibited over the years."

Instead of engaging the public, NPS is pretending to offer three versions of the same plan for the public to choose from. All three rely pretty much upon the same junk and political science. All three contain the same bureaucratic buzzword phrases like, 'protecting resources, visitor experience, adaptive management, not cost effective' etc. ad nauseum. Predictably, NPS will then 'interpret' public comment to 'choose' whichever Plan has already been decided upon in Washington. If NPS needs more 'public input' to tip their own scales toward one version of the plan or another, this will be obtained, as it has been in the past, from their own ambitious compliant Park Service employees.

So since the public is being given a 'vote' which is essentially like a choice between the same guy wearing three different hats, it is fair to say that it is false that the public has input into the Denali Road Management Plan.

And is anyone buying the crude NPS photo psychology in the Draft Plan? To ask whether it is 'true or false' as to the intent of the NPS photo selection would insult a donkey's intelligence since the NPS propaganda conveyed in the selection of photos for the Plan is about as subtle as dumping the proverbial t__d into the party punch bowl.

There are eleven photos in the Plan. No personal cars or trucks are pictured. Buses only. Only two of the eight buses pictured are not NPS buses. Their identifiers have been blurred out by NPS. One of those private buses shown is not moving at all. The other private bus photo is in a bleak rocky background in a drab setting which could have as credibly been shot in the desert of Sinai as in Denali.

But all three of the photos in the Plan showing folks actually viewing wildlife in Denali National Park, depict them securely supervised in green clearly identifiable Park Service buses. The NPS photo propaganda message is clear, 'We want only buses on our road, and don't ride those private buses because the only way to see animals is to ride on our green government bus, and we got lots of them!'

Not to belabor the point, but the photo on page 'i' of Appendix C, is truly right out of some NPS, 'How We B.S. and Buffalo The Public' seminar. It shows a Park Service bus approaching a wolf on the road. In the near distance, one can see a group of people obediently waiting for two more park service buses to micro-manage their unforgettable visitor experience of a lifetime; that of seeing a bored mangy wolf on a gravel road from a Park Service bus. What a nice neat tactic for NPS to use taxpayer money to photographically trash the private competition, and to promote and advertise NPS's own government commercial enterprise in a so-called NPS Management Plan.

NPS operates above, outside of, and in violation of the law in Alaska. True or false?

Resoundingly true! This is an easy one. At best, the laws to which the public are held accountable are a minor inconvenience to NPS. Keeping skilled NPS 'comfort officers' on duty at the 'National Park' on Pennsylvania Avenue in Washington D.C, in order to service/accommodate the whims/desires of the President in office, is probably the secret weapon NPS relies upon to ensure that the Department of Justice will 'defend' whatever criminal actions NPS uses to steal lands, and to ignore NPS violations of ANILCA.

Whether it is the NPS bombing of the University of Alaska's mining teaching facility at Stampede in Denali, intimidating the public from using their parks by having NPS Park Rangers beat up a 70-year old Alaskan like Jim Wilde in the Yukon Charley National Park for daring to operate his boat through a Park on state waterways, or if it is NPS imprisoning, disarming and waging what Judge Singleton (a rare federal judge) described as "psychological warfare" upon Palakia Melgenak and her family over several generations at Katmai, when NPS wanted to force the Melgenaks off their lands in order to take it over for a chosen NPS concessionaire, the public has no protection from NPS crimes committed under color of law. Consider that the NPS bomb at Stampede was of the same size and components as that used to destroy the Oklahoma City Federal Building, April 19, 1995, eight years after Stampede was bombed by NPS.

So the NPS bombing of Stampede, like the Oklahoma City bombing, was a terrorist act? True or false?

False, of course! Because the Stampede bombing was another despicable, destructive, cowardly criminal government act by NPS, committed against the public, and not vice versa like the Oklahoma bombing against the government,????so the government would never call it a 'terrorist' or even a criminal act.'

Last month's letter from Secretary Andrus to Secretary Salazar also describes the public distrust of the National Park Service and Andrus refers to the, "?clear alienation of Alaskan NPS personnel from the general population." Gee, no kidding. Not too hard to figure out why.

One stated goal of the Draft Denali Park Road Management Plan (p.9 under Objectives in the PLANNING GOALS AND OBJECTIVES section, para. #3) is, ? ? Continue to protect and promote the historic character of the Park Road and related elements of the cultural landscape." Is that true or false? If true, why didn't Denali National Park Planner Miriam Valentine, who has been spending our resources on this Draft Plan since 2006, go to her boss and say,

"Hey look Superintendent Andersen,?.one vital historic use of the road was to maintain the 'cultural landscape' of the Kantishna mining district. Why don't we restore the mines to the miners and/or the heirs of the miners from whom we stole the ground and rights? Continued mining was one of the stated guarantees which Congress included

in ANILCA. Why don't we obey the laws for a change, do what we are supposed to do, and give the American people an opportunity to view such an important part of their history and cultural landscape?"

Of course a Valentine wouldn't dare suggest such honesty and expect to keep her job, but someone should ask why wasn't the Kantishna Mining District, which was an important piece of the Alaskan/American 'cultural landscape,' preserved for the American people? The stated mission of NPS is to preserve special places for the American people.

Instead NPS destroyed the Kantishna Mining District. NPS not only bombed the Stampede Mine, but forced out all the miners by inviting lawsuits from environmental groups to freeze mining, and then used NPS promulgated regulations to circumvent ANILCA and the stated intention of Congress that mining would continue in Kantishna. Most miners in the Kantishna area went broke or died trying to get their representatives or the courts to force the NPS to obey the law. The Alaska delegation tried to intervene. None were successful against NPS, represented by the DOJ. Thanks to NPS, this vital piece of Alaskan/American history in Kantishna is now lost forever.

So we can say that the NPS "..protect and promote the historic character of the Park Road and related elements of the cultural landscape." statement is false by default. It sounds good in the Plan but actually is nothing but more NPS b.s. fed to the American people.

Miriam Valentine is the Denali Park Planner. She sent me a copy of the Draft Park Road Management Plan, and wrote, "Please don't hesitate to contact me if you have any questions or would like to discuss elements of the plan." True or false? False. I didn't 'hesitate.' I wrote her several times with questions. No response. I questioned her in person at the 10-06-11 meeting, and she informed me that she would only answer my questions "after" the public comment period was closed. What good would her answers be after the Public comment period is closed? Such duplicity works for NPS but not for the public trying to understand and comment on a government plan.

While Ms. Valentine would not answer any questions at the 10-06-11 meeting, she did say that the goal of the Plan was to increase Park Road traffic by 10%. True or False?

Another 'false' it seems. Less than a year ago, in response to my submission of a SF299, pursuant to instructions from the regional NPS office, I got a response on 12-28-10 denying my access and stating that NPS wants to "reduce" traffic on the road. Since you can't increase traffic by 10%, and reduce traffic on the same road at the same time, it seems that the Valentine '10% traffic increase' statement is another false NPS statement.

On page 'iv' of the EXECUTIVE SUMMARY, under Goal 6: Provide Access for subsistence use and inholders. The first sub-paragraph reads, ? "Provide legally required access to Kantishna inholdings. ?" True or false?

Clearly false. I asked Ms. Valentine if inholders had been contacted, and why I had not been. Ms Valentine apparently isn't allowed by her handlers to answer my questions, but she did confirm that there are NPS sweetheart deals with certain inholders, by replying that "some inholders" had been contacted by NPS in order to incorporate their access needs into the NPS Road Management Plan. But just'some.'

Further confirming the Denali sweetheart deals is the list of Park Road passes, which is found in the 2011 Superintendent's Compendium for Denali National Park and Preserve. How many passes an inholder is 'entitled' to depends directly upon how well Denali officials 'like' an inholder, and/or to what extent an inholder is willing to kiss up to the bureaucratic bottoms in this bloated bureaucracy. I have been issued NO passes.

Since 1972 I have had my inholding, the historic town of Diamond, Alaska, from which Hudson Stuck in 1913, staged and began the first successful climb of Denali. I have had a business plan on file at NPS, and records of the repeated denials of my attempts to gain my 'legally required access' which the Executive Summary refers to, goes back for several decades. Albeit while he was referring to NPS stealing a different piece of private land, officials at the Denali Park, Regional, and National levels, in denying access in Denali, have employed what former Interior Secretary Andrus describes as, "?every disingenuous and devious means possible."

That is actually a 'kind' description from Andrus of the efforts made to deny me the "legally required access" which NPS puts in their plans only as lip service to the 'damn Congress' which they otherwise ignore. NPS officials have lied, falsified documents, made false accusations against me and threats to me, stalled, and repeatedly employed the standard federal responses; that of simply not responding to the public, and/or sending inquiries onto another integrity-challenged Park official for stalling at a higher level.

It might surprise some to learn that since this NPS Road Management 'Ruse' began in 2006, I, as an inholder, have never been contacted regarding my access needs. But it doesn't surprise me. I refuse to bribe Park officials at any level, and were I given my legal access to develop my inholding, I have no intention of giving the Superintendent free coffee if he stops by for his morning Twinkie, and have no intention of providing cut rate prices to NPSer's booking my lodge for a NPS seminar or one of their touchy feely endless and pointless 'meetings' which, like their 'seminars,' are an NPS mainstay. So I don't meet prerequisites for a sweetheart deal with NPS.

Essentially the antiquated rights granted NPS officials to conduct sole source bidding and to subjectively grant access rights with virtually no oversight, not only stifles the private sector. It also provides NPS the ability to conduct an 'enterprise' which the Justice Department would normally raid and close down as a criminal enterprise, and would prosecute those criminally responsible for running it, were it not a scheme being run by the National Park Service.

Free speech troubles NPS nearly as much as other democratic institutions. I was on the inholder access list for years and granted unimpeded access to Kantishna until I published and distributed a bumper sticker linking NPS with a Nazi swastika. My 'legally required access' suddenly disappeared. Despite suggestions that I cease the comparison in order to placate the Parkies in power, I have steadfastly refused to remove the offending stickers. (or to apologize to the Nazis for linking them with the U.S. National Park Service) So NPS has made it very clear through their actions, that they will continue to violate the law in blocking my access until I die if those stickers are not somehow quashed.

Access to build and run it, is the key to developing any business which ANILCA guarantees inholders. This so-called NPS 'Draft Park Road Management Plan' is to be for the next 20 years. The Denali Park Road provides the historic access to inholdings in the Preserve. If still alive in twenty years and still pursing my 'legally required access,' am I to look forward to an email from a then-retired 'Valentine' stating, "Oh gee, sorry. Why don't you get back to someone at NPS in five years when they might have almost finished the Draft for the 2031 new Park Road Management Plan." ?

The 'Draft Denali Road Management Plan' is actually just another step to further restrict private enterprise which Congress guaranteed under ANILCA and to extend the tentacles of the federal government. Compared to other violations, this phony NPS Management Plan which bypasses the public and relies instead nearly exclusively upon past questionable NPS data, may seem to be just a small matter. But the exertion of control through blocking and reducing access to private and State lands by the feds' is an ever-tightening incremental process from which the public seldom, if ever, will win relief.

Correspondence ID: 139 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 13:16:38
Correspondence Type: Web Form
Correspondence: I strongly support Alternative A, no change. I am a long time Alaskan and take a bus into the park twice each summer. This is a great service and I enjoy it very much. I would not want anything to be done that would change the experience I have in the park. Alternatives B and C would make result in changes that would distract from my experiences. Management of the transportation service is just great as it is so please keep it that way. Thank you.

Correspondence ID: 140 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 13:18:51
Correspondence Type: Web Form
Correspondence: After reading through the alternatives I believe that Alternative A, no action is the only responsible choice for the future integrity of Denali National Park. Denali National Park is a wild place, it does not need more management costs, higher numbers of buses, or more crowds. We need to keep access costs low for residents, and not modify management plans for the visitors whom spend only a fleeting moment in the park.

Correspondence ID: 141 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 13:33:45
Correspondence Type: Web Form
Correspondence: I can only support NO ACTION, please don't change a thing. It will only makes things worse!

Correspondence ID: 142 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 13:57:12
Correspondence Type: Web Form
Correspondence: I support Alternative A.

My experience as a former tour manager that brought cruise ship passengers to the park, is that the current system is already over crowded. Sometimes we would stop to

view wildlife along with 6 other buses and no one really had a good experience when that happened. Please DO NOT open the road to even buses and DO NOT mix the backpackers and day use visitors with the tour participants.

I strongly disagree with Alternative B that would degrade the visitors' park experience by overcrowding the buses. I also believe we need to retain vehicle access to the Teklanika Campground. In 1971 the Park Service made an agreement with the public that if we gave up our vehicles you would provide free bus service. You have reneged on this promise and already the fees to ride the bus are too high. I can only foresee them going higher and more of our rights taken away with these new plans B and C.

If anything is done, it should be to limit the tour operators from bringing in more people. This is the people's park, not the cruise industry's private park. You limit the number of ships in Glacier Bay, so why not limit the numbers in Denali?

Correspondence ID: 143 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 14:37:20
Correspondence Type: Web Form
Correspondence: After reviewing the draft plan, I wish to urge your support of Alternative A. Alternative A is the no-action alternative that would continue current management. We do not need to have more tour buses in the park, adding to road congestion. As an Alaskan resident, I very much like to keep controls on the number of visitors and buses, both to reduce the impact on wildlife and to keep fellow visitors from becoming the principal scenery. The current system is a good one and should be retained.

Correspondence ID: 144 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 14:56:52
Correspondence Type: Web Form
Correspondence: do not change the road plan at all unless you are willing to allow LESS busses

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Correspondence ID: 145 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 15:02:09
Correspondence Type: Web Form
Correspondence: I cannot support any decision to increase the amount of private (profit seeking) corporations doing business in the our national parks. During my visit to Denali this summer with my spouse and 4 month old son, we were already extremely limited in access to the park and I feel alternatives B or C would only limit the expereice of people with young children. I feel that increased use of private vehicles or small tour groups would enhance the public's park expereince. Reduce the number of visitors that are brought to the park by large corporations.

As a US citizen I feel that I should have preferential access to National Parks. As a US taxpayer I should not be forced to pay the same amount as a foreign national.

Correspondence ID: 146 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 15:17:46
Correspondence Type: Web Form
Correspondence: I vehemently oppose your plan to revoke photographer's permits to road access in Denali and replace them with tour busses.

Correspondence ID: 147 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 15:41:39
Correspondence Type: Web Form
Correspondence: I prefer the NO CHANGE option. I am restricted enough, as it is.

Correspondence ID: 148 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 15:43:14
Correspondence Type: Web Form
Correspondence: I don't agree with giving more rights for commercial access to the park.

It is a National Park and should be made available to the public over commercial enterprise.

Alternative A is my selection.

Don't change.

Correspondence ID: 149 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 15:57:06
Correspondence Type: Web Form
Correspondence: I have visited Denali National Park on two occasions. The first was many years ago with my father. The second was to photograph the park. My first visit led me to take photography classes to get better images of the park during my second visit. This second visit has led me down the path to become a professional photographer.

The one goal I have had since that time was winning the Photographers Lottery in order to get a private pass to shoot the unbelievable scenes that take place in the hours that your bus service does not run. It is my understanding that your new draft removes this lottery in place of sending more people down the main road that will never leave the bus.

Please do not make this decision. You are not only removing the opportunity for photographers such as myself to shoot images of what many consider the Mecca of Photography; you are also depriving the general public to see the sides of Denali that only a professional photographer can bring them.

I realize we can still ride the bus and get off when desired. I also realize that we can backpack to many locations. But in order to catch the scenes we capture, the ability to move quickly and spontaneously is critical. Please reconsider this position.

Correspondence ID: 150 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 16:15:29
Correspondence Type: Web Form
Correspondence: I support Alternative A- to leave the Denali Road system as it is. I feel the other two plan proposals would give favoritism to big tour groups and the aesthetic value of visiting the park. I envision more crowded busses, less time to stop for dropping off and picking up hikers. Also I'm worried more busses would be allowed and existing camping experiences would be eliminated. I support Alternative A.

Correspondence ID: 151 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 16:24:12
Correspondence Type: Web Form
Correspondence: I support Alternative A- to leave the Denali Road system as it is. I feel the other two plan proposals would give favoritism to big tour groups and the aesthetic value of visiting the park. I envision more crowded busses, less time to stop for dropping off and picking up hikers. Also I'm worried more busses would be allowed and existing camping experiences would be eliminated. I support Alternative A.

Correspondence ID: 152 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 16:25:40
Correspondence Type: Web Form
Correspondence: Dear Denali Park Rangers, I have been a resident of Alaska for over 40 years and I like it that the Park has restricted driving and keeps people contained in the buses. However, this past summer we went to Kantishna after not going into the park for a few years and we noticed that there are a LOT of cars and people out of their cars. I think they are photographers and such. Everyone should be required to stay in their cars or buses. The animals are so far away now that you have to have binoculars to see them. I like it clean, and I liked when the animals were close, but the amount of people who are loose and wandering around has had an impact on the animals. I do not know how to solve this problem.

Correspondence ID: 153 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 16:31:44
Correspondence Type: Web Form
Correspondence: The current system provides users of the park the opportunity to see the wildlife and does not over tax the wildlife in the park with intrusion. The original trade off for not alowing vehicles intot he park was a free bus shuttle through out the park. That has since changed and I saw no safeguards in place that would ensure the park was available to all Americans at a reasonable cost. The new proposals do not benifit the average famility that travels inside Alaska at their own pace while it seems to cater to organized outside commercial groups who can monopolize the bus system especially the schedule. Option A will leave the system as it is and I believe that is the best way to treat to

he issue.

Correspondence ID: 154 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 16:34:24
Correspondence Type: Web Form
Correspondence: I am in favor of NO CHANGE for Denali Park Road. I guess this is Option A. Please leave the system that is in place alone. I'm tired of seeing Corporate America make all the decisions in the US. Thank you.

Correspondence ID: 155 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 16:49:42
Correspondence Type: Web Form
Correspondence: I wish to vote for Alternative A - no changes to the road plan.

Correspondence ID: 156 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 16:53:27
Correspondence Type: Web Form
Correspondence: Please keep the park as is. DO NOT ADD ANY MORE OF THOSE STINKY, NOISY BUSES. It is hard enough now for an individual to enjoy the peace and beauty of the park. I definetely choose ALTERNATIVE A From what i have observed living here, the "bus tourist" bring nothing to our state. The big companies (princess, etc.) bring there own drivers, park thier trains out of tax areas, etc.

Correspondence ID: 157 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,18,2011 06:56:38
Correspondence Type: Web Form
Correspondence: NPS

Denali Transportation Plan: As a "independent traveler" I prefer Alternative A. Thanks,

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Correspondence ID: 158 **Project:** 22494 **Document:** 42309
Received: Oct,18,2011 10:31:39
Correspondence Type: Web Form
Correspondence: My family has been visiting Denali Park semi-annually for 35 years. I have seen many changes, some good, some bad. We used to just catch the bus and take our own food and enjoy the full day going back to either Eielson or Wonder Lake and I don't believe there was a charge for this. The "fancy" buses for the Princess Tours were much fancier, but we were happy with what we had. Then it changed and we had to make reservations in advance. This worked o.k. too. I do not think you should allow more buses on the roads, as over the years we have seen less and less wildlife. They can't behave naturally with all that traffic. We also do not want to see the buses so crowded that no one can enjoy the trip. Let's not change our park so much that it is not a good experience for anyone. Princess and the big cruise lines should not dictate what we have here in Alaska. Thank you.

Correspondence ID: 159 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,18,2011 10:38:08
Correspondence Type: Web Form
Correspondence: Just another example of our government becoming "of the Corporation, for the Corporation and by the Corporation".

Correspondence ID: 160 **Project:** 22494 **Document:** 42309
Received: Oct,19,2011 10:42:15
Correspondence Type: Web Form
Correspondence: I support Alternative A (No Action) as the two other alternatives actually restrict road use by limiting time spent at wildlife stops, in scenic areas and even at rest areas and appears to benefit large tour operators at the expense of individual travelers.

Correspondence ID: 161 **Project:** 22494 **Document:** 42309
Received: Oct,19,2011 12:59:59
Correspondence Type: Web Form

Correspondence: It is an outrage and most unfortunate to consider blocking professional photographers from Denali and instead giving their places to commercial tour companies. Denali National Park is owned by all the people of the United States, not just commercial operations. Please defeat this measure.

Correspondence ID: 162 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,19,2011 13:09:36
Correspondence Type: Web Form
Correspondence: As a resident of Alaska who enjoys visiting Denali, camping at Teklanika and riding the busses in the Park, I support ALTERNATIVE A, the "No Action" alternative. I believe that the other 2 alternatives will significantly decrease my ability to enjoy the park because they both cater to large tour companies and fill the busses with people who are travelling with tour companies. I believe that it is critical that there be SEATS available on busses going both directions and if all the seats are allocated ahead of time, this will not be possible. Shutting down private vehicle access to Teklanika will also make it more difficult to use the campground, which should not happen.

Since the current system makes it possible to drive to Teklanika and find seats on the busses going into and out of the Park, I support the continuation of that system.

I fully support the comments set out by Tom Walker in his commentary in the Anchorage Daily News on October 16, 2011. If the Park planners do not have those comments, they can find them at: http://www.adn.com/2011/10/16/2123596/alaskans-need-to-comment-on-denali.html#disqus_thread

Since you cannot guarantee that my personal contact information will stay private, I am not including my address or my email.

Correspondence ID: 163 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,19,2011 14:55:54
Correspondence Type: Web Form
Correspondence: As usual, the National Park Service gave little to no attention to non-tourism in-holder access. When the road was first closed, the NPS made an arbitrary decision to limit overall traffic, and that policy is unfairly imposed on in-holders who have valid commercial as well as private rights to access their respective properties. This position is compounded by the fact that the NPS places non-commercial traffic in the same permit "pool" with commercial in-holder tourism access (ie. those in-holders operating lodges for profit). None of these proposals adequately address the statutory entitlement for access rights of in-holders guaranteed by ANILCA, and is clearly biased for commercial/tourist in-holder access as well as other commercial tour operators and those who are able to and desire to use the park's bus system. Because of this, there are no alternatives better than any others, and therefore the "best" alternative is the default position to keep the current system.

The only truly adequate proposal would actually consider rights granted to in-holders under ANILCA, and allow in-holders adequate and feasible access. The permit system itself flies in the face of ANILCA's in-holder access guarantees, which grant rights in perpetuity and are not subject to the NPS's discretion. A "permit" infers that the NPS is granting a privilege instead of acknowledging an access right.

For that matter, the Denali road itself is arguably a VERY well documented (but unadjudicated) RS2477, and by denying ALL citizens unrestricted rights is opening the federal government to litigation.

The Park Service needs to recognize that access is the lifeblood of Alaskans and stop managing Denali National Park as a private playground for themselves and those who are able to afford expensive private tours, or physically capable (and/or interested in) using the park's "Wilderness Access" buses.

Correspondence ID: 164 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: Resent for consideration with his current comments. Original send date of October 15, 2010

TWT & DNHT Box lunches, snacks, and hot drinks

For nine years now, I have been around Denali. I have seen commercial expansion take place in the Canyon during my time here - it has been extensive. I can remember my first visit to Denali in the summer of 1995. Our flight arrived in Anchorage in the late afternoon and we rented a car to drive to Denali. We had dinner and then decided to start driving up - hey, we were full of excitement and it wasn't dark so we drove up and got here in the morning ready for breakfast. As seven o'clock in the morning we were looking for a breakfast place in Denali. Guess what, there was none. The Salmon Bake served only donuts in coffee in a styrofoam cup. The only two hotels on the

strip were the Princess and Chalet. One of the two was only available to their guests. The other would allow independent travelers into the resaurant but the buffet food looked unappealing for an expensive price. So resigned, we ended up in the Park Hote cafeteria line with the employees ordering the only choice available - plain scrambled eggs on a paper plate.

I supose tours at a time developed when it was impossible for hotels to provide sack lunches for them. In the past hotels did not have the capacity to provide prepared lunches or coffee kiosks and there was no Denali mall in the canyon. It ain't that way anymore.

The other day I was prepping my bus for a morning tour I stodd back looking at the 50 neatly packed box lunches placed in the passengers' seats and had to ask myself the question: Why are the National park Service and its concessionaire in the lunch and hot drink business anyway?

The hotels and local eateries can do a much better job. The food will be fresh and the guests will have a choice. The competition between the hotels and local sandwich and coffee shops will provide many choices and high quality. After all, what is it that people really want? They want choice. They want to choose for themselves what they are going to have for lunch or what kind of hot drink they will have in the morning. When they have choice, if they do not like the selection made for themselves, then they have no one else to blame but themselves.

We all know customer satisfaction scores for the lunches have been low. This year a lot of thought and effort has gone into making some changes to improve those scores. Unfortunately, these changes seem to be inadequate and do not appear to be substantially improving customer satisfaction opinion. In spite of all best effects, food law restrictions are one of the major impediments that do not allow us to make improvements that would improve customer satisfaction to a satisfactory level. As a side note, an amazing amount of food from our box lunches is being wasted or simply discarded into the trash bag. I have to ask, how is this helping the "Planet Green" image? Excessive food waste is as improper as not recycling.

Regularly the Grand, Chalet, and Princess hotels, tour guests are boarding the bus with coffee drinks, lunches and other snack food items they have purchased. In fact just a few days ago, much to my surprise, Mayflower tour group said they upgraded their lunches and 33 of them boarded the bus at Chalet hotel with sack lunches and a case of water.

Hot drinks are very difficult to manage on a bus. The hot water is often no hot and the packaged choices of hot chocolate, coffee, or tea choices are limited. An eight-ounce paper coffee cup with instant coffee does not compare with a Starbuck specialty style hot drink purchased a the hotel.

My idea is that you should eliminate lunches and hot drinks on all tours. Eliminate them for the next concession contract or even for the remainder of the current contract. Inform visitors they will need to provide their own food for the tour. Give others the opportunity to provide for their needs. Let the guests choose their own lunch either buying from the hotel directly or going to an independent eatery that caters to providing them with lunches. The hotels and independent eateries like Subway and Salmon Bake and others would love to sell fresh lunches, coffee drinks, and other food items to tour passengers before they board buses in the morning or afternoon. They can provide fresh food with choices. Presently the cost of a freshly prepared upgraded sack lunch is $15. I have never heard a complaint about the cost. If a person wants a sack lunch, they buy it. It happens all the time. Regularly guests board the tour buses with a specialty hot drink purchased at the hotels or the WAC coffee and snack bar.

On DNHT and TWT tours, continue to provide bottled water. Additionally, I suggest we provide an assortment of five kinds of packaged snacks in a plastic bin that we pass back the center aisle - two selections per person. A variety of packaged snacks provides choices and allows for easy changes. We can still recycle plastic, aluminum, and cardboard as well as collect the trash.

If the NPS and Aramark JV consider hot drinks an important component to the quality of the tours, then I recommend NPS build a bear proof kiosk at Teklanika Rest Stop that can serve hot drinks to guests.

As a driver/naturalist I would much rather give attention to interpreting the meaning of the park rather than explaining the logistics of lunches and hot drinks. I would rather focus on helping guests make a connection to preserve and protect, thereby helping the NPS build a supporting public. I would rather send them home with a powerful sense of place, a personal investment in, and an invitation to return rather than using that time managing a snack box lunch and an 8 oz cup of hot chocolate.

This suggestion is a new paradigm and I ask NPS to consider it.

Correspondence ID: 165 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: Originally sent on 6/11/2011 Resent for consideration

I have three suggestions to help reduce the bus and visitor congestion at the Polychrome rest stop.

If necessary, drivers explain to passengers that we are trying to lessen the impact at Polychrome so this is what we will do.

The first suggestion is to ask that all TWT Tour buses stop only once, either on the way in or way out, and stay for only 10 minutes. Even numbered tour buses can stop on the way in and odd numbered on teh way out. Limit the stop to a 20 minute photo/view stop for any visitors who want to get off bus for a quick view or photo. Explain there are nobathrooms here. I've timed unloading the bus several times; it takes, on average, about 3 minutes for all passengers to disembark a tour bus, so the effective stop time would be 15 minutes. For example, I give a time to be back on the bus. If I arrive at the stop at 9:56am, I would say please by back on the bus by 10:10am. The DBL and Roadhouse buses could be asked to help by also complying with this guideline.

Second, for VTS buses, make the Polychrome stop a "whistle-stop or flag stop". In other words, VTS only stops to pick-up or drop passengers. It could be explained by the driver that Polychrome is only a request stop and if anyone wants to get off and walk or hike, they can, but they will need to catch one of the following buses on a space-available basis. VTS then can and should make an on-board photo stop on the return trip at the grader-pullout/turn-around point west of the rest-stop.

Third, remove the wooden staircase leading to the short trails above Polychrome and replace it with more conventional timber steps used for trails. The wooden staircase is an attractant and an out-of-place eyesore. If it replaced, this will reduce the temptation for visitors to explore beyond the rest-stop time limit but still provide opportunity for VTS passengers who want to stay and explore the upper reaches of the rest area.

Correspondence ID: 166 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Jul,24,2011 00:00:00
Correspondence Type: E-mail
Correspondence: We are writing to express our concern and preferences regarding the subject plan. We recently visited the park and found the park road that is open to private vehicles to be pleasant and certainly not overcrowded nor did it appear to have a negative impact on the environment or wildlife. I think it should be left as is and remain open to public use. This is a national asset and everyone has the right to experience the park even in their personal vehicle. No one should be excluded for any reason. We are alarmed at many recent closures of national park road to public access.

Correspondence ID: 167 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Aug,11,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I have visited Denali National Park recently and I loved it there. It is such an amazing part of the world. I enjoyed my time in wilderness and wish more parks all over the world were managed like Denali is. I got a brochure in my hands regarding the Park Road. As a student of Environmental Quality Science, I understand that preservation of nature and the ecosystems is crucial. However, I also understand that the parks are for enjoyment of people of present and future. It is sometimes difficult to combine the two, but I have been impressed with the management of visitations in Denali. I also have a few suggestions. Regarding the road, it is great that only buses are allowed on the most of it. However, the buses are rather old, very noisy and smelly. I believe that National Parks should lead by example regarding use of environmentally friendly technologies. Nowadays, there are buses which are silent and do not pollute air as much. For example, compressed natural gas buses would be a great fit for Denali National Park and feasible to use in Alaska. On the similar note, railroad represents a smaller environmental impact per person than on road transportation. I believe it would be a win-win solution for the park visitors, businesses and the environment, if railroad use was encouraged rather than the highway. Contracts between railroad and hotels nearby Denali entrance would be a great step towards more environmentally friendly ways of tourism in Alaska. Tourists who fly in from all over the country or the world usually arrive in Anchorage or Fairbanks. It would be great if the vacation organizing services offered deals or already had it as a part of the vacation plan to rather travel from the airport city to Denali by train than a bus. I believe it would also enhance the experience. I suggest that the National Park Services encourages the use of more environmentally friendly means of transportation by for example offering some discount for a tour bus ticket in the park or so, if people show a railroad ticket which they have arrived with. I am a huge fan of the American National Parks and admire the leadership, management and support these extremely important and valuable areas receive. All the best!

Correspondence ID: 168 **Project:** 22494 **Document:** 42309 **Private:** Y

Received: Aug,12,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I congratulate the NPS for its well thought out and detailed document. As a 36 year resident of Alaska, and a visitor to Denali National Park almost annually, I am loathe to change the transportation in and access to the Park. Having just returned from Yellowstone National Park, and also having spent time in Zion, Bryce, Yosemite, Acadia and other National Parks in the US and Alaska, I have come to truly appreciate the limited road access, restriction on private vehicles in DNP. THe traffic jams and unsafe behavior exhibited by drivers and their passengers, not to mention traffic jams and damage to land adjacent to the roads in those parks when wildlife or a scenic view is sited, I appreciated Denali even more. ALso, the road in DNP, particularly the area around Polychrome Pass, is not conducive to expanding access to more private or commercial vehicles. At the same time, I believe Alternative C does offer additional, unique opportunities for people to enjoy the DNP without unduly, in my opinion, increasing traffic that would negatively impacting wildlife, the enjoyment of DNP users,

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Correspondence ID: 169 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,16,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I am writing to comment on the new draft management plan for Denali National Park. I am a frequent visitor to the park and have been very pleased with how the current park is being operated under the 1986 management plan. Every time I visit the park, I see numerous wildlife species. I do not want to see the bus limits as stated in the 1986 management plan changed. More bus traffic will mean less wildlife for visitors to see, a simple fact. I have read the park studies detailing how bus traffic numbers impacts park wildlife and I find it disturbing that the park is even considering increasing the number of buses. Do not let the Alaska congressional delegation or corporations dictate how the park is being run for the benefit of the people of the United States. Denali is a national park and must be run like one. Thank you for your consideration.

Correspondence ID: 170 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,19,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Denali Park Planning Denali National Park and Preserve P.O. Box 9 Denali Park, Alaska 99755

September 22, 2011

Comments: DRAFT DENALI PARK ROAD VEHICLE MANAGEMENT PLAN 1. For almost two decades large tour companies, through the Alaska Tourism Industry Association (ATIA) have lobbied for increased bus access to the park. For over ten years, for example, they have pushed to have the Professional Photographers Permit System (ProPho) revoked, and that vehicle allocation replaced with tour buses. When the studies began that led to this Draft Management Plan (DRMP) the public was told that since tourism had declined due to the economic recession, bringing a lessened demand for access to the park, a "breathing space" existed to develop a new road plan and do it right. After wading through the DRMP, it is my opinion that this plan does not do it right. The abstract describes two action concepts as more "flexible," yet those proposed standards actually restrict use on the road, by limiting time spent at wildlife stops, rest areas, or in scenic view sheds. This is not more "flexible" from a visitor's perspective but actually very beneficial to the process of allowing greater bus access. After reading the voluminous and curiously-worded DRMP I can only support Alternative A (No Action) for the following reasons: A) In order to be implemented, Alternatives B and C (which are largely the same but somewhat re-worded) would need at least one million dollars or more additional funding over current park funding levels. B) In 1971, prior to the controlled access shuttle bus system, NPS made a very specific agreement with the public: you give up your private vehicles and we will provide you with FREE bus access. NPS arbitrarily reneged on this agreement when substantial fees were charged beginning in the 1990's and the "shuttle" system's name was changed to the "VTS." The "economy tour" nonsense is another nail in the coffin of the NPS' original pledge to the public. Where in any of these plans is the guarantee of affordability? C) Alternatives B and C give too much power and discretion to future Superintendents for management decisions. One bad Superintendent, swayed by commercial interests, could have long-lasting negative impacts. D) A 20-year life span for (and impacts from) Alternatives B and C is too great a risk for plans which can only be best described as "experimental" due to the micro-managing required to succeed. E) Finally, it appears obvious that NPS has already decided its course of action, likely preferring Alternative C, and that this public input period is a charade. F) Any plan that would increase the number of buses on the park road should be disallowed as it is within reason to believe that increased bus traffic has negatively impacted wildlife viewing opportunities, and distributions, along the road. Since no base line data was established at the time the bus system this opinion cannot be shown to be false. G) Success of Alternatives B and C would require the full cooperation of Denali's Professional Drivers and at this point such support is lacking, and likely will be, regardless of contract clauses. H) A specific and finite cap of road traffic must be retained but is missing in Alternatives B and C. (see point F.)

GENERAL DISCUSSION The first warning that the DRMP is flawed and skewed came in the opening paragraphs of the Executive Summary that accompanied the printed plan. Wording described Alternatives B and C as "a less rigid adaptive management approach." Less "rigid?" When visitors are limited to the time constraints proposed for wildlife stops, departures, even toilet breaks, then the system is NOT less rigid but more rigid and defined. The real meaning of this wording would include the phrase "less rigid?to the tour industry that wants to cram as many people into the park as possible." Since one of the major players pushing for transport system change is the Alaska Tourism Industry Association (ATIA) the reality is obvious. The DRMP is very curiously worded in places, glossing over shortcomings with surplus verbiage. Weasel

words appear constantly throughout, words such as "likely," "could," "should," "might," and "may." Clearly this "Adaptive Management Strategy is an experiment and the park should not be subject to such "experimentation." For the Alternatives B and C to have any chance whatsoever to succeed, they each require 1) an active, participant "park-first" Superintendent, 2) micro-managing by a whole new layer of park bureaucracy, 3) additional funding at over $1 million per annum. In these harsh economic times, when we might be facing yet another drastic recession, and in the face of Senator Murkowkski's warning that "no agency, no department is safe from drastic budget cuts," it is unconscionable for the NPS to propose Alternatives that require budgetary increases. In fact, this past winter of 2010-11 Denali Park's senior management staff met to discuss the likely budget cuts coming in FY2012. From several sources the word is out that park admin has even considered closing the road at Toklat River and the Eielson Visitor Center beyond that, and foregoing road maintenance beyond Toklat, in order to save money. (As well, no doubt, to create a public furor that might result in supplementary funding.) Given that the senior staff is already reacting to future predicted funding cuts, it is absolutely imperative that any changes to the road plan that requires additional funding be shelved and reconsidered. How can professional managers knowingly adopt Alternatives that are likely imperiled in advance for lack of funding?

Alternative B: Visitor Access, Camping: This Alternative would "phase in tents-only campground over a 10 year period" and disallow private vehicle access to Teklanika Campground. Only recently has tent camping been reinstated at Igloo and Teklanika campgrounds after closures due to bear and wolf activity. Until recently, only hard-sided vehicles were allowed at Teklanika while Igloo Campground was closed for an excessive time period due to wildlife concerns. This action would once again benefit an increase in bus traffic by removing private vehicle access to Teklanika, at the same time discriminating against Senior Citizens, or others, unable on unfit to tent camp. Alternatives B&C: Bus Transit and Tours In consideration of bus service and tour offerings, I reject Alternatives B or C. Alternatives B and C would increase vehicle impacts on wildlife during the morning and evening periods when crepuscular animals are active. B and C would also increase vehicle impacts during the spring shoulder season when recover from the rigors of winter and calving/lambing. B and C also increase vehicle impacts during the fall shoulder season when many ungulates enter rut. The draft plan says that these effects could be mitigated by use of indicators, standards and adaptive management. Despite using weasel words, this segment states that these effects would not be entirely negated by such measures. Why not use indicators, standards and adaptive management under Alternative A? That suggestion was rejected in the planning process. Alternative B may be the worst of the three Alternatives. Maximizing the numbers of visitors and minimizing empty seats on the buses would significantly degrade many visitors' park experience. A full, crowded bus is never a preferred means of travel for anyone, anywhere. Combining the economy self-guided tours with the transit function of the bus has several, glossed-over drawbacks but crowding is the chief negative. Regardless of whichever alternative is ultimately selected, I support the proposal currently under Alternative B that states: "NPS employees would access duty stations on the restricted portions of the Park Road (Savage River to Wonder Lake) via an employee shuttle system. The transit system would be used by employee guests for access." This would demonstrate good faith by NPS by minimizing staff contributions to seasonal vehicle limits and road impact. This past fall, as during many other years, senior park staff and other park employees drove into the park in both private and government vehicles, some with family members, in ways totally denied the general public. In fact, on one nice weekend in peak color season, the Wonder Lake area and government facilities saw an influx of park staff. What should be mandatory for the public should be mandatory for park staff as well. I also agree with this analysis from a colleague: Appendix C states that, "For these surveys, visitor reactions were discerned for increasing numbers of vehicles. Visitors were shown a series of photos of the same scene with increasing numbers of buses and asked to score each photo from 4 (very acceptable) to -4 (very unacceptable). Social normative curves were fit to the results to identify visitor reactions to different crowding levels and provide guidance to park management in setting standards. "I question the accuracy of using a photograph as a means of assessing visitor response to actual bus density in the real world, on the ground. If I am inside a bus watching an animal out the window and several other buses are lined up behind and in front of the bus I am on, I may not even be aware of exactly how many buses are present. First, I am probably absorbed in watching the animal. Second, especially if I am on a fairly straight section of road, I may not even be able to see very clearly how many buses are there. My main concern is, am I getting a clear view of the animal I came to see and is it behaving normally despite the vehicles present? If I am and it is, then I really don't care how many buses are there?In a photograph, what appears to be a major traffic jam might be something that would not bother me from inside one of the buses that is part of that jam." Professional Photography (ProPho) System: Alternatives B and C. Totally unacceptable and unreasonable changes. Last winter, at the request of Supt. Paul Anderson through his staff, I put together a PROPHO work group. The NPS planner, Miriam Valentine, told us during day one of the first meeting what the NPS wanted to do to the ProPho program and the changes envisioned. As a group we completely rejected them as unreasonable and unworkable. As a group we dedicated ourselves to educate NPS on the needs of professional nature and conservation photographers and worked for a win-win situation. Through several phone conferences and hours and hours of work with Ms. Valentine we came up with what we viewed as a win-win scenario. What we proposed: a) Improved and reworked Criteria to ensure only qualified people got the permits. b) NO permits issued at all in peak season, Mid-June to Mid-August. c) Five permits in the shoulder seasons of spring and summer. d) Consider increasing permits to seven in the late shoulder season when bus numbers are down. e) Parkwide access, no boundary line of the Toklat River, as proposed. f) Transfer the photography programs from law enforcement to another, more unbiased, NPS management division.

As a group we were shocked and dismayed when we viewed the DRMP's Alternatives B and C. These Alternatives were identical to what Valentine told us on the very FIRST day. Ms Valentine and her cohorts completely ignored everything we said and all of our work to come out with a win-win and workable solution. This wasted hours of our time and work, as well as her own. When reproached, Ms. Valentine could only focus on the "unreasonableness" of increasing shoulder season permits to seven and essentially said, when all the bureaucratic verbiage was stripped away, "what you people do is incompatible with what we are going to do." We can only determine from this experience, that once again the public concerns are being discarded and the outcome of the "public process" is mere window dressing and the decisions have all been made. No wonder the public does not trust government or get involved in the "public process." Discussion: Alternative B and C combine the still photography program and the

videography program for alleged "equity" and administrative oversight. In our view, if selected, standards must be established to ensure genuinely fair and equitable sharing. Alternative B States: "Two private vehicle permits would be allowed each day for the entire park road but managed for two distinct areas: Savage River to Toklat and Toklat to Wonder Lake." The ProPho Work Group rejects this division and arbitrary boundary. First, it denies access to the iconic Wonder Lake area and assigns one person to an area where there is no vehiclular- accessible camping area. Is a person assigned to the western sector supposed to drive from Teklanika CG each day? If nothing more this would add hundreds more miles to a person's driving time and have significant impact on road traffic. Secondly, both areas are not equal in wildlife and landscape photo opportunities. Patently unfair to permitees from Europe, Asia, and other distant locales. This past autumn a permittee from Canada detailed expenses of $2700 for a SUV rental vehicle and a total outlay of $6000 for his Denali visit. Under this Alternative, if he had been assigned the eastern portion of the park, he would be denied access to Wonder Lake on what might have been the one clear day of his trip, or his one chance in a lifetime. Conversely, it would be unreasonable to ask a person assigned to the western sector to drive by a grizzly bear standing next to the road in order to reach the western sector. Alternative B and C also states "During periods of high volume, permit holders would be required to use the transit system to avoid?" This absolutely was never previously mentioned in any discussion with NPS or by Ms. Valentine. We can only assume this was deliberate and it was not mentioned because it is entirely unacceptable. This negates a permit and if imposed at short notice upon a person's arrival at the park, wastes that permit holder's time, effort, and money. Photography of a serious nature is not possible from ANY bus. I would also say that the caveat about riding the bus when the park is busy or for "administrative uses" is a non-starter and a joke. We volunteered to give up half the permits, in the busy part of the year, to achieve a workable solution and we were totally ignored. Instead we get a proposal that relegates PROPHOS to the bus. Alternative C: Three permits for the entire road; "no time may two or more (ProPho) vehicles be stopped at the same location?" Without clear guide lines who will decide who may stay and who must go at a wildlife stop? Conflict and enforcement problems are inherent in this proposal. The standards for determining acceptable number of vehicles at a viewpoint or wildlife sighting appear to count all vehicles as equal. A passenger vehicle with engine off has the same negative impact on visitor experience as a huge, noisy, bus? Hardly. Additional comments on ProPho Alternatives: Several ProPho WorkGroup members see the Alternative as reflecting an inherent bias against photographers. Denali is reputed to be one of the most difficult parks to work in and the least welcoming to Photographers. Difficulty of access is the main issue, but the well-known prejudices of some senior park staff coupled with a few openly antagonistic and arrogant bus drivers also contribute to the negative reputation. The Criteria for issuing programs has needed revision for some time but the Law Enforcement Division has not taken interest in, nor desired to, update that segment of the program. Consequently, some individuals who received permits should never have gotten them, in the end creating some negative impacts along the park road. Updating the criteria would go a long way towards solving short term conflict issues. Most ProPhos are NOT intent on producing images to "advertise" the park as has been alleged. Instead, the purpose is educational and informational, with images reaching countless numbers of people who will never see the park. Maintaining a useable, reasonable ProPho system benefits the long term goals of Denali and the NPS. Personally, I would rather see the system eliminated than be made unworkable and unreasonable as these Alternatives would do. Conclusion:

A 20-year life span for Alternatives B and C is too great a risk for plans which can only be best described as "experimental" due to the micro-managing required to succeed. Clearly this "Adaptive Management Strategy" is an experiment and the park should not be subject to such "experimentation." For the Alternatives B and C to have any chance whatsoever to succeed, they each require an active, participant and "park-first" Superintendent, and increased funding, a huge leap at this point in time. Finally, if Goal 1, "is to ensure protection of wildlife populations," any increase in road traffic should be discarded, with any plan needing a specific and inviolate cap on road traffic.

Correspondence ID: 171 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,15,2011 00:00:00
Correspondence Type: E-mail
Correspondence: October 15, 2011 Dear Denali Planning Committee, I have worked in Denali National Park in Alaska for the past twenty five years, twenty two and a half years as a Visitor Transportation System (VTS) and Tundra Wilderness Tour (TWT) driver. While reviewing your latest draft vehicle management plan proposals for managing bus traffic and visitor experience within Denali National Park, I became angrier as I read the proposals. I could find no place where you modified your proposals from the first round of public comments taken last year. In fact, I asked many questions of NPS in last year's 1st round of proposals, which you did not answer either directly or in this round of proposals. Through this experience I find that you are not exactly receptive to the public's comments and questions and this may especially be true of Denali Tundra Wilderness Tour (TWT), Visitor Transportation System (VTS) and the Denali Natural History Tour (DNHT) drivers of Denali. Due to this lack of responsiveness I suspect that you are merely going through the motions of the required public comments and that you have already made your decisions. This planning process did not include anyone on your staff who has intimate knowledge and experience of a 10-20+ year driver or manager of the transportation system ? and it shows in your proposals. And it is for the above reasons that I am including many others: the President, Senators Murkowski and Begich, Interior Department, environmental groups in my comments ? to attempt to insure the integrity of public comments and to insure that you will actually pay attention to them and integrate them into the final transportation plan. While the National Park Service within Denali is focused on the grandiose, the costly, the micro-managing of bus traffic and visitor experience, the esthetics and reducing impact to wildlife (which I do not believe either proposal B or C will accomplish) you are leaving out a critical and perhaps the most important aspect of any plan ? and that is the practical application of the plan. This is a consistent failure within NPS (Denali) planning, as the new Eielson Visitor Center most glaringly demonstrates. While spending $10 million dollars of taxpayer funds to build this flat roof visitor center; this Visitor Center leaks water from snow melt every spring costing taxpayers even more money in repairs and cleanup. This is not just limited to Eielson. In 2010 while NPS was spending more taxpayer funds to remove Polychrome Rest Stop they were informed by both concession (Doyon-Aramark Joint Venture) transportation managers and drivers at the beginning of the summer season that this could cause elderly passengers on Tundra Wilderness Tours (TWT) and on the Visitor Transportation System (VTS) buses to use the willows to urinate and defecate before reaching Toklat to use the restrooms there.

This did in fact occur with my passengers and with many other drivers as well. The removal of this rest stop caused huge lines to develop at Toklat near mid-day causing an additional 10-15 minute delay before many people could use the restrooms. These lines were video-taped by TWT drivers and NPS was informed of these lines and given the video tape evidence and they still did not respond with the building of urinals until August when they finally broke ground. In my view this was an inexcusable way of treating park visitors, especially since during this same time they were spending even more taxpayer funds to build the unnecessary Mountain Vista parking area (that receives little use) as opposed to having interim rest rooms available to the public before Polychrome Rest Stop was removed. If the National Park Service cannot predict and take rapid action due to the consequences of the removal of one rest stop then I have no faith that they can quickly adjust to situations that develop due to radically changing the current transportation system (Proposal A) that has an 85-90% approval rating. In fact, at the Denali meeting this past August you stated that if problems do occur that they will not be corrected until the following year under Proposals B and C and that is only if the Superintendent agrees with the remedial actions; as these plans concentrate all authority within the Superintendent (this is something else I disagree with as the Superintendent will not only be exposed to great political/economic pressure but may also bring his/her own personal bias). This makes proposals B and C reactive in administration as opposed to progressive in attempting to avoid the problems to begin with. Furthermore, these proposals are reactive - a year later, not immediately when they can and should be dealt with. In other words, park visitors will have to bear the brunt of having their trips interrupted, delayed, or inconvenienced ? in my view this is not meeting the needs of park visitors. While reading Proposals B and C there were many aspects of these proposals that I suspect many will find objectionable whether they are Republicans, Tea Partiers, Democrats, Backpackers, or RV Campers. Quite simply, NPS has created two Proposals that can unify this diverse group of people - in opposition. First off, both of these plans would spend approximately a million dollars more a year in taxpayer funds each year (over Proposal A) to implement; roughly $20 million dollars over 20 years as well as create a larger research bureaucracy. I seriously question the wisdom of giving NPS even more funding when Congress and the President is considering reforming Social Security, Medicare, and Medicaid and looking at ways to reduce the deficit and National Debt. Even though it may be a drop in the Federal budget, one needs to start somewhere and I would suggest budgetary reform of NPS in Denali. NPS is asking for $300,000 for the life of the Adaptive Management Research program (under Proposals B & C) and plus another $75,000 per year to run it. At the Denali meeting they attempted to explain this methodology and I am not sure if there was anyone from the public who attended who actually understood it. What became apparent was the incredible amount complexity that was involved, the over- zealous attempt in mico-managing bus traffic without consideration for the tremendously variable number of situations that drivers find themselves in, and consequently, the micro-managing of the visitor experience. All of which, I disagree with. Over the past three years we have seen a significant decline in tourism within Denali including a decline in the number of tour ships coming to Alaska. Furthermore, with the current economic state of stagnant growth and high unemployment within the United States and many other countries, the economic climate for future significant growth within Denali is at best is limited. This being the case, why are we pushing to radically change a transportation system that has evolved over the decades and has received (from Visitor Transportation System and Tundra Wilderness Tour passengers) a 85-90% approval rating? Why are we proposing to rid ourselves of the 10,512 vehicle cap that has served in protecting the park for decades? Why is NPS proposing to spend additional tax payer money on an untested (in actual situations) a complex adaptive management strategy that calls for the privatization and potential corruption of NPS research? Let me explain this last comment. Just this year, the VTS and TWT Drivers who work for Doyon-Aramark Joint Venture (the concessionaire) were mandated that we would have to enter wildlife viewing data on computerized touch screens that were installed in some of the Visitor Transportation System and Tundra Wilderness Tour Buses. Eventually all buses will have these computer terminals. We are not trained biologists or wildlife technicians, nor is there any control over the data that is entered or sent via computer touch screens upload to satellite ? download to NPS data monitoring. Accuracy of the data entered cannot be guaranteed by NPS, yet this is supposed to be a significant element of your adaptive management strategy. Currently, you have already spent $10,000 of taxpayer funds for the installation of these units into buses. Why is NPS installing computer terminals into buses when the accuracy of the data being collected and sent cannot be guaranteed? Furthermore, allowing this joining of the Concessionaire and NPS within the research realm opens the door to further tourism industry influence within the very heart of NPS research and its potential for corruption of data and NPS mission statement. I firmly believe that there must be a strong separation between NPS and the Tourism Industry to maintain the integrity of the National Park Service and the protection of not only our National Parks but to provide for the unbiased needs of our visitors. I also take exception to taxpayer funds being used (in my view squandered) to purchase and install these computer touch screens and the uploading and downloading of dubious data for dubious research. If you cannot explain the research where lay people (at the Denali meeting) can understand it, then in my view it raises serious questions. NPS must maintain the highest standards for research with clear focus, integrity, openness and honesty. You have already shown great difficulty with this ideal in Bear biologist Pat Owens continued use (during NPS Resource Day for drivers this past May) of antiquated and extrapolated data from the 1994 Jeff Kaye study to determine Denali's bear population that is not supported by any current methodology. Apparently, even though Denali is a dynamic and ever changing eco-system that even NPS admits, this apparently doesn't apply to the bear population within Denali. Attempting to marry a highly complex Adaptive Management Program with a highly complex transportation system that has an infinite number of variables (and this goes way beyond bus traffic patterns) without any evolutionary development is a recipe for failure. Furthermore, under these plans a government mandate is created for all buses to stop at a Visitor Center regardless of whether passengers wish to stop there or not. If this mandate occurs in the morning when time is critical to view the Mountain (Denali/Mt. McKinley) then visitors may lose their only chance of viewing and photographing it. If it occurs in the afternoon, it can conflict with other recreational, dinner, flight seeing, or travel plans that they may have. Additionally, many elderly visitors are tired at the end of a tour or VTS trip and wish to rest. Under the current system (Proposal A) we (the drivers) honor a visitor's decision as to whether they wish to get off at the Visitor Center or not by dropping them off at the end of the day where they can catch a shuttle bus back to their destination. This meets the needs of both those who wish to get off and those who do not. Under Proposal B NPS proposes doing away completely with the Camper Bus and exploring strategies (their word) for hanging equipment on the exterior of buses. They do not specify their solution and none of drivers know what they are talking about. Exposing camping gear to rain, snow, mud and various other elements does not meet the needs of visitors. And there are still narrow sections of park road where it can be tight for buses to pass one another. Any camping gear on the sides of a bus will make it even more difficult for buses to pass in certain areas of the park road. Placing heavy gear on top of bus is not a good option either as it can expose either visitors or drivers to injury while hauling the gear up (some packs weigh 70+ pounds) or getting it down as well

as exposing it to the elements. You also propose that the majority of seating on transit and tour buses would be pre-booked but you do not define how far or how little in advance this actually is. In fact, proposals B & C are filled with generalities and very little in the way of specifics as to how they wish to accomplish their goals. NPS must spell out the specifics for each as to how they intend to transform the various aspects of the transportation system beforehand so it can be evaluated. You also proposed an economy tour along with a transit system but they do not define affordability and actually refused to define it at the Denali meeting. Since you are the one's proposing to radically change Denali's transportation system how can the public make an informed decision if they do not know what their costs are? Proposals B & C rely on modeling of traffic patterns but you cannot and have not modeled every situation that the current system has evolved from. This lack of evolutionary development guarantees I believe massive visitor disruption and a complete failure of the system. Remedial actions in response to this failure won't occur until the following year (according to NPS) so drivers, support staff (both concession and NPS staff) will have to compensate as best as possible to limp through the summer season. Personally, I do not feel visitors should have their trips disrupted and wait for years as a new system undergoes evolutionary development when the old system has already gone through this development and is very successful. Also under Proposal B, Teklanika Campground would be converted to tent camping after ten years ? so no RV or car camping. It was only a few short years ago when both Igloo (tent only camping) and Teklanika (tent and RV camping) Campgrounds were closed to tent camping; in my view unnecessarily for years due to wolf activity. This is another provision I disagree with. Not only does NPS propose micro-managing the visitor experience on buses but also within the realm of camping as well. I do not see how this meets the needs of park visitors. Under Proposal C NPS has proposed to bring back the disastrous "Puddle Shuttle" which has been tried twice before ? once in the 1980's and once in the early 1990's. This shuttle bus would run from Eielson Visitor Center to Kantishna and back and turns Eielson Visitor Center into not only a destination hub but also a transfer hub. In the past, this has created massive over-crowding and confusion at Eielson, and this would especially be the case with visitors wanting to upgrade their tickets to Wonder Lake or Kantishna or having to change buses to reach their destination either going west or east. At the Denali meeting, NPS stated that they wish to base this shuttle from the east end of the park which would squander eight hours of Department of Transportation (DOT) regulated shift time (and drivers must be at or below 80 hours in eight days) for drivers in just commuting to or from Eielson. This is another practical (and legal) reality that NPS refuses to consider whether it is in bringing back the "Puddle Shuttle" or extending TWT trips to Eielson and Wonder Lake with mandated Visitor Center stops. With the previous experience of the Puddle Shuttle NPS has demonstrated that they have not learned lessons from the past or that they have forgotten those lessons that were learned long ago. This is another serious failure within their planning process. Under both Proposals B and C, NPS has proposed to dramatically change the Professional Photographer program. I am very much opposed to changing this program in the way that NPS envisions. Professional photographers have contributed tremendously to promoting National Parks but also in helping to educate and illustrate little seen biological behaviors of wildlife and to inspire the public. This is something that I have experienced before in past years as I have photographed under this permit system. I would suggest that NPS work closely with professional photographer representatives to make the make the system more flexible, yet maintain the five permits that are currently allowed per day. Suggestions: Create a committee of NPS, Denali drivers and management, tourisms officials, professional photographers, Kantishna Stake holders, independent scientists, and environmentalists to review the needs of these various interests and how the current transportation system can be modified to meet these needs as well as chart a course for the future. Furthermore, I would like to see an independent auditor appointed to look into cost over runs of various projects over the past ten years as well as look into where contractors were called back for additional work on the same project due poor workmanship, poor planning, or unexpected problems arising. Doing this could help to improve NPS planning in the future and not to repeat the same mistakes. With the endless amount of construction that Denali has faced over the past several years and planned for the future, I would like to see a two year (at least) moratorium on all new construction so the necessity of the projects can be reviewed as well as their costs and quality control of planning. Earlier this year, NPS announced that they were planning to repave the first 14.5 miles of the park road beginning next year. The last time they did this (early 1990's) it took three years to complete and was incredibly disruptive to park visitors. What will they do (if anything) to insure that park visitors will not have their trip to Denali disrupted over the next three years? If this project is indeed necessary, then I would suggest that repaving only occur between the hours of 10PM to 6AM. This would help minimize disruption to park visitors and it would also allow the contractors to work more quickly with less interruption from bus and other traffic. Summary: In essence, NPS has created a "Trust Me - I Know Best Plan". I for one do not trust them as this plan lacks any sense of practicality and realism involving the park transportation system and they certainly do not know best. NPS has never actually operated any aspect of Denali's transportation system at any time. It has either been the Park Concessionaire by itself or in combination with school bus contractors who ran the VTS system prior to 1995. NPS has had oversight but has never conducted day to day operations of the system itself. Due to this lack of experience, insight, practicality, and realism; even though they may have the authority to make decisions, in my view they are not qualified in and of themselves to radically change a successful system. And this is actually another issue. The current transportation system (Proposal A) has evolved over decades to meet the needs of park visitors and to do so with minimal impact. Essentially, the bugs are worked out of the system which has occurred through this evolution and it is less costly. In my view Proposal A and maintaining the vehicle cap at 10,512 is the only proposal that meets the needs of park visitors, protects the park and is less costly. I do believe there is room for improvement and having a committee of various interests would be the best way to determine those improvements. Lastly, it is not the Denali Transportation System that needs reform (it can most certainly be improved), it is the National Park Service within Denali that is in desperate need of reform. In my view, NPS within Denali needs to be reformed with an emphasis and re-commitment to preservation of the park and its wilderness with a new emphasis on its people (both visitors and NPS and concession employees) to create a quality and welcoming atmosphere for all - needs to be its focus. I do believe in fully funding the National Park System until a specific park demonstrates irresponsibility in its spending (the use it or lose it budget mentality ? something else in need of reform), its loss of vision, and its contempt for park visitors. I do believe that the NPS management of Denali National Park has blown through all three of these bench marks and consequently, funding ideally should be reduced to base levels to run the park until reforms can be made. In my view, Denali's first biologist Dr. Adolf Murie promoted the ideal vision for Denali's future and in meeting the needs of the park's dual mandate: protect the park and its wilderness qualities as well as provide an intimate and quality experience to all park visitors. Returning to this vision would help to insure the quality of visitor experience within Denali National Park and return the National Park Service within Denali to its goal of fulfilling its dual mission.

Correspondence ID: 172 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,18,2011 00:00:00
Correspondence Type: E-mail
Correspondence: My husband and I, both nature photographers, live in NY but have been coming to Denali National Park and Preserve every year since 1995. Our image of Mt.McKinley has appeared on the US international airmail postal stamp and traveled to all countries around the world for a number of years. Our 2004 National Geographic magazine article, Dance of Death, which for the first time documented the death of a young bull moose pursued and killed by wolves, offered a dramatic account of the wilderness reality. Hundreds of our photographs were published in school and college textbooks, popular magazines and other educational materials. Comments: DRAFT DENALI PARK ROAD VEHICLE MANAGEMENT PLAN We cherish and support many wise efforts to conserve the Park, and hope it will remain wonderful and wild for many years to come. Yet the current proposals concerning the Park road use seem to be moving rapidly in the wrong direction and appear to be designed to give free range to big tour bus operators and further decrease the access and the enjoyment of individual tourists and photographers. After studying your DRMP I document we support Alternative A (No Action) since the other two options, B and C, are clearly detrimental to the Park and the visiting public. You must do better than that!

Correspondence ID: 173 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Sep,30,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Comment on the Draft Denali Park Road Vehicle Management Plan and Environmental Impact Statement In the state of Alaska, Denali National Park and Preserve is, ironically, a treasure and an island. Located in Alaska's vast Interior, the Park is a spectacular region of mountains, glaciers, rivers, forests, tundra, and wildlife. Most Alaskans, however, do not go to the Park except when they first move to the state or when relatives or friends come to visit. There are several reasons for this, which I won't go into here. Still, many Alaskans agree that Denali National Park is a treasure and that it should be protected for future generations. I appreciate the huge amount of effort and data reflected in the Draft Denali Park Road Vehicle Management Plan and Environmental Impact Statement. Most of this effort and data focus on the bus system and ramifications of the bus system. I understand that historically Denali National Park has attracted people interested in taking tours of the Park, originally by train and automobile and later by bus. Maximizing opportunities for visitors to view the Park from behind the windows of a vehicle continues to be a main goal of Park administrators today. The Draft Vehicle Management Plan clearly reflects this. It seems to me that the administrators of Denali National Park favor Option C (among Options A, B, and C in the Plan) and that the corporation that owns the four bus systems currently operating along the Denali Park Road will profit the most from Option C. My question is: Should the administrators of Denali National Park continue to place primary emphasis on maximizing opportunities for visitors to view the park from behind the windows of a vehicle'as Option C will do'or should they be asked to consider an Option D? According to what I have observed during many visits to Denali NP over the past thirty years, a pressing need and desire among Park visitors is to get off the bus and to walk, explore, hike, and directly experience nature and the Park. Many of these visitors are overweight, have sedentary life-styles, and are spectator-oriented. Yet they, like most other visitors to the Park, truly desire to directly experience the Park. Rather than encouraging visitors to get off the bus and directly experience nature and the Park, however, Option C encourages visitors to 1) stay on the bus, and 2) ride the bus in growing numbers. There is no Option D'and indeed, according to Park administrators, there can be no Option D'because Option D falls under the purview of a different plan: the Denali National Park Backcountry Management Plan. The backcountry in Denali begins 125 feet from either side 2 of the road. Currently in this six million acres of backcountry, the Park has just 27.3 miles of maintained trails, the maximum size allowed for hiking groups is 6 people, the popular ranger-led "Discovery Hikes" accommodate just 6 to 12 people per day, and "There is little data currently available on the extent of day hiking in the park" (Draft Vehicle Management Plan, p. 99). In other words, day hiking is currently not much encouraged (except among backpackers) and day hiking is also not much studied. On the other hand, travel in a vehicle (a bus) along the Denali Park Road is highly encouraged and extensively studied. Option C would perpetuate this motorized touring focus for Denali National Park and would likely increase it. I do not oppose the idea, as stated in Option C, of "adaptively managing [the Park Road] to achieve specific desired conditions." However, under Option C, management of the Park Road will be conducted in a vacuum: a vehicle vacuum. Option C does not'and cannot'address the wider, deeper question of whether the administrators of the Park should continue to limit most visitor experience of the Park to mainly that which can be gleaned from behind the windows of a vehicle. In my opinion, an Option D is needed: one that helps to transform the focus of a visit to Denali National Park from inside the bus to outside of it.

Correspondence ID: 174 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,19,2011 16:35:41
Correspondence Type: Web Form
Correspondence: There are many issues with the vehicle management system as it currently exists, including scheduling a higher number of buses during certain time frames and lack of consistency in the VTS experience (i.e. some drivers provide information, others don't). I believe that the NPS has an opportunity to manage vehicles, especially buses, so that the transportation would be more effective, and provide a better visitor experience. But I believe that the two "action" alternatives as written will meet not meet those goals, and could make a system that is too complicated for visitors to understand and unmanageable.

I understand that the current vehicle "limits" on the park road are not defensible, but they have served the purpose of controlling road use. I support keeping the numbers of vehicles at wildlife stops, rest stops, spacing of buses, etc. to specific levels for different management zones. But I question the NPS' ability to monitor the situation, even with more personnel/funding. More importantly, I don't believe that the majority of the bus drivers would cooperate. Traffic models are wonderful tools, but when it comes

to replicating the desired traffic pattern in the field, with real people, I don't believe that it will be successful.

I support combining the professional photography and commercial filming programs, but the NPS must provide these permitees access to the entire length of the road - zoning isn't realistic. Limiting the number of photographers/film makers at a wildlife stop to two is appropriate. Changing the number from one to two permits per day during the main visitor season would provide the program coordinate the leeway to meet the demand for these uses. One is not enough. Later in the season, when there are fewer buses, I support increasing the number of permits to no more than five/day. The bus system does not provide the flexibility for photographers/film makers that they need.

I can not support many concepts in Alternative B. Having visitors desiring different types of experiences on the same bus will make it difficult for any of them to meet their goals, and it's confusing. I particularly disagree with charging people more, i.e. the economy tour, just because they want to learn something and may not be getting off the bus. The majority of visitors want to learn about the park. Some will select a "tour" because they are assured in getting information - they don't care if it's "interpretive". The park is missing a huge opportunity to provide all bus passengers with the ability to make a park connection if they don't' require all drivers to provide not only safety messages, and responses to questions, but also basic information about the park, its wildlife and cultural resources at appropriate locations and times during the trip. Years ago, drivers were required to pass a test on their park knowledge each year, and this should be reinstated. The amount of inaccurate information provided by drivers, transit and tours, is appalling. Additional educational materials could be available for purchase through Alaska Geographic, but a visitor shouldn't have to learn about the park solely on their own. If the buses are operating at capacity will make it difficult for visitors to disembark, and reboard another bus within the standards. The NPS and the current concessioner have been struggling with this for years, and visitors still wait, sometimes for hours, to reboard a bus. A full bus makes also makes it difficult to move around and view wildlife, etc. on the opposite side of the bus, decreasing the experience.

The only thing that should be called a "tour" is what this alternative refers to as the "premium" tour. I support this tour going to Teklanika, Toklat and/or Kantishna. The shorter ones, i.e. less than 8 hours, should incorporate a stop at the Denali Visitor Center. Visitors on the current TWT consistently complain about the length of the tour (since the time includes their pickup and dropoff at the outside hotels), so traveling as far as the Eielson Visitor Center is not their desire. Provide a longer option, i.e. the Kantishna Experience for those who wish a really long day, but otherwise keep it shorter (or provide the option to use the shuttle system).

Park employees living at Toklat, Eielson, Wonder Lake, etc. should not be required to use a shuttle to access their work places. Their traffic has minimal impacts, compared to the buses, and this would be an additional hardship for employees traveling to and from their remote duty stations, especially with groceries and other supplies. I support requiring employee's guests to use the transit system, as they are coming to visit not just the employee, but the park. This is addressed in Alternative C.

Overall, I support many of the concepts of Alternative C to maximize the visitor opportunities, with modifications. This should be the NPS' priority, as much of the info previously stated about the proposed plan was that a goal was to "preserve the visitor experience".

? Combine transit and self-guided tour, i.e. all drivers should provide more than just safety info (see earlier comments). The self-guided concept adds a layer of complexity to the bus system that isn't necessary if all drivers provided basic info.

? Walk the talk. I strongly support the increased oversight of NPS administrative use and contractors. There are many park employees who take vehicles to do tasks that could be accomplished by using the bus system, or some other means.

? Teklanika River Campground should remain accessible to vehicles. Eliminating vehicle access and requiring visitors to ride a bus would discriminate against older visitors or families who want a camping experience further out in the park, and for whom tent camping would be a hardship. The impacts of vehicle traffic on this section can be mitigated by having specific times to travel the road.

? Photographers/film makers ? see earlier comments. One permit per day will not be adequate to meet the need. Two per day through the main visitor season would be a reduction from the current situation, and would be adequate for most of the summer. Having up to five per day during the late summer/early fall would not displace visitors, as the numbers of buses have already decreased at that time.

? CUAs for Kantishna lodge day tours should be limited to no more than four per day total. Keep in language that would allow reduction of this number if there are adverse resource impacts.

I have used the bus system for years, and feel that it is still the best way to experience the park. But that experience needs to be consistent, it needs to provide flexibility for visitors who want to expand their experience and go beyond the park road, and the system needs to be simple to understand. I appreciate the opportunity to comment and I hope that my suggestions will be considered for modifications of the alternatives.

Correspondence ID: 175 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: Originally sent Feb 25, 2010. Resubmitted for consideration.

Denali Park Road Planning Workbook Comments

The following are my suggestions or concerns.

Proposed vision for the Vehicle Management Plan: I accept and support the proposed vision of the DNP Road Transportation System.

What would I like the transportation and Denali Park Road experience to look like in the future? I want the experience to reflex the spirit and character of the Alaska wilderness.

The most important thing to accomplish in the plan for the Park Road is: To protect the wildlife viewing experience.

This could be best accomplished by a management concept that included: Reducing the number of private vehicles that access the Park Road. Using the bus system to enhance the visitor experience and build a national park advocacy.

Therefore, please retain the annual allocation season limit of 10,512 for the total number of vehicles. Seek ways to drastically reduce the number of private vehicles utilizing the Park Road. And find ways to reduce the impact on the paved section of the road from the DVC to Savage River Bridge.

Please excuse my preaching but I'm a big proponent of preserving the wilderness character of Denali. I fully support the National Park Service in their mission of preserving and protecting the resource while providing it for the benefit and enjoyment of the people.

We must remember what Adolph Murie said in his fourteen page analysis and critique of McKinley's MISSION 66 program,"...our big task is to preserve this wilderness spirit....I recognize that my point of view will stress intruding and injuring the spirit of wilderness as little as possible with sometimes a little inconvenience resulting. I would rather err in that direction."

From the PBS National Parks Special: George Hartzog shelved most of the Mission 66 plans for McKinley. There would be no hotel and tourist services in the interior. The roadwork was stopped where it was: thirteen miles widened and paved, another seventeen widened but unpaved, and the remaining sixty miles to be kept in more or less the condition Adolph Murie had suggested-a narrow gravel pathway where, he said, "the feeling one gets is that the rood passes through a wilderness that comes up to the road." It is still that way today. 2

The 1986 Consolidated General Management Plan page 27-28 says, "In 1972, the year the Parks Highway opened, a mandatory public transportation system was instituted, and only visitors with overnight or other special use permits were allowed to drive their cars beyond Savage River. Because of significant increases in visitor use over the next decade, by 1981 the level of bus and permitted private vehicle traffic had increased 50 percent and was again recognized as a threat to wildlife viewing. A special wildlife study undertaken that year and completed in March 1984 concluded that the traffic increase between 1974 and 1981 had not had o significant effect on overall populations in the area, but that it had caused many moose and bears to avoid using the road corridor. In addition to the demonstrated effect of reducing the number of moose and bears that utilize habitat in the immediate vicinity of the road, there is concern that increasing traffic might eventually disrupt the movements of migrating herds if the spacing between vehicles becomes too short.

In an effort to allow as many people as possible to view all of the big four Alaskan wildlife in their natural habitat, the National Park Service will make additional use of the

shuttle bus system and allow fewer private vehicles on the park road. It has been demonstrated that the activities associated with private vehicle use cause the greatest disturbance t wildlife as evidenced by their avoidance behavior, because the occupants of private vehicles can stop at will and approach the animals on foot, while visitors riding shuttle and tour buses are not allowed to leave the vehicles in areas of critical wildlife habitat. Buses also have the obvious advantage of carrying up to 40 people per vehicle, compared to the average carload of three people per vehicle. In implementing this concept the National Park Service will continue to start the operation of the shuttle bus system during the Memorial Day weekend and will extend it into the fall for as long as visitor use remains high."

Proposed changes to management zoning and desired conditions?

These changes seem reasonable. I support the proposed changes to Wildlife Viewing Sub-Zone 2. I also support the creation of Wildlife Viewing Sub-Zone 3.

No explanation was provided for the creation of the Special Use Area from the Old Park Boundary to

Kantishna. You probably have good reasons. Why do you want to create it and what is its purpose?

Isuggest you change Motorized Sightseeing Sub-Zone 3 to a Wildlife Sub-Zone. This zone has substantial wildlife viewing opportunities in the spring and fall. At those times the wildlife is especially subject to considerable disturbance. For example, bears chasing moose calves in the spring and the moose rut in the fall. Moose and bear jams are common and a serious traffic problem. I suggest establishing controlled vehicle access beyond DVC during these times. Better yet, phase in restricted vehicle access beyond DVC to buses only for the entire season. Grand Canyon and Yosemite have a form of this type of restriction already.

Please consider promoting and providing free, narrated trips departing from the DVC (not the WAC) in conjunction with Dog Sled Demos similar to the Savage River Shuttle, but upgraded. I highly recommend you consider requiring participants to show an entrance fee receipt or voucher in order to board. By showing the entrance fee payment it allows access to both Dog Demos and the Savage River corridor. NPS would probably see an increase in entrance fee collection. Buses would depart every half hour or every hour depending upon demand. The quality of this service would be upgraded considerably from what it is now. Stops could be provided for Dog Sled Demos, pull-outs, Savage River Cabin and 3

Campground, and a turn-round at Savage River Bridge or Primrose. A hiking trail (I think this is in the planning) should be constructed from Savage River Campground to Savage River Bridge. The impact of wildlife disturbance, feeding of the gulls, hiking into closed areas would be greatly diminished. In addition, a fully-narrated park introduction and mission statement explanation would greatly enhance visitor connection with DNP. It would be a trip that would make them say, "I only had a few hours, but it was well-worth the time. I learned a lot. I was glad I took it." This idea parallels the concept of specialized introductory, orientation tours with off-the-bus experiences mentioned in Management Concept C.

Proposed goals and objectives?

Goal: All of the goals are very important. This goal is the most important of all. We must never kill the goose that lays the golden egg. A visitor comes to Denali primarily to see wildlife-especially bears. We must never forget this. All other aspects of what makes Denali the great resource it is are subordinate to this fact.

Goals 2-7: The NPS must do the best It can to provide these services to the general public. It is very important the visitor feels he has access to Denali, our great wilderness resource. The visitor's needs must be met in order to build advocacy and support for the park service. However, "intruding and injuring the spirit of wildermess as little as possible with sometimes a little inconvenience resulting." As Adolph Murie said, "I would rather err in that direction."

Goal8: Please find ways to reduce unused bus capacity-sending out empty or three-quarters empty transit buses, just because the schedule calls for it, is not a good practice. Let's be green. It is a bad image and practice to have a fuel-burning, virtually empty shuttle bus pass a packed Tour bus on the Park Road. It's all about scheduling and flexibility. This may require adaptive management practice. One transit bus departing the WAC hourly would be a good starting point. Every half-hour another bus could be dispatched on heavy days of the week and/or at times during the core season as needs dictate. let's learn to be flexible and adaptive.

Potential indicators? Vehicles at Eielson Visitor Center: Under Management Concept A The Existing Condition. From what I hear, EVC already experiences bus overcrowding from time to time from what appears to be a lack of adequate bus parking space. Because you are proposing EVC as a future stop for premium tours, I

recommend you consider expanding bus parking. I also recommend not allowing private vehicle parking (except for handicapped),and establish a maximum bus parking time-limit- probably 20 minutes.

Potential transportation svstem management concepts? I highly favor Management Concept B. My second choice is Concept C. I don't like Concept D at all. I think it would be a disaster. Concept A Is what we need to improve; am not in favor of maintaining the status quo. Positive improvements can be accomplished.

Honestly, there needs to be a practical fix for the entire bus system. It doesn't serve the needs of the visitor as well as it could. Concept B is the fix it needs. 4

Economy Tours: This is a very good idea. As you know, many if not most visitors take an Eielson Visitor Center or Wonder Lake bus from the Wilderness Access Center. They don't hike and very few want to get off the bus. They are already using this service as an Economy Tour. The Economy Tours would require a different level of interpretation than the Premium and Specialized Tours.

Please don't send out Economy Tour buses from the WAC booked with less than 60% capacity. Wait 15- 30 minutes until it's full. Let's be green! Serve and provide for the needs of the visitor, but also upgrade the need to be effective and efficient. When explained, people understand these principles and will accept these policies. You may have to sacrifice a little convenience for efficiency. The U.S. Government has an image problem with waste and inefficiency. Let's help change that image.

Transit Bus: Yes, the purpose should be for providing access for off-the-bus wilderness recreation. It also should be used not only for hikers and campers, but also for NPS operations, professional photographers, artists in residence, contractors, and Kantishna Lodge employees, etc.

A very important aspect of transit bus system needs to be emphasized. As much as is possible, NPS employees need to utilize a transit bus for access. The image of service of the National Park is in play. By using the transit system, NPS shows its support and commitment to Denali's purposes and values. If this means inconvenience, then so be it. You can be flexible with work schedules and learn to adjust operational needs. Please make every effort to do so. If you employ the Economy Tour concept then you will need fewer transit buses. Economy Tours with empty seats could also be utilized for NPS transit purposes.

Transit buses should run on a strict schedule with a minimum number of stops for wildlife and limit those stops to two to four minutes each stop. Transit buses should arrive and depart scheduled stops on time.

Premium Tour: Extending premium tour options beyond Toklat to Eielson Visitor Center and Wonder Lake is a very good idea.

A Premium Tour should be a premium tour. The best interpreters should be used. The equipment should be the best. HDX buses are quiet and fairly comfortable. Quiet and comfortable are very important. However, they are also much too crowded and there is no leg room. In addition, there is not enough room inside the bus to handle trash collection and recycling properly. They need upgrades on sound systems (wireless) and video cameras. The buses themselves are worn and out-of-date. The HDX style enables horribly dirty windows on rainy days. Lunches, snacks, drinks need to be upgraded. Hot drinks are difficult to manage.

There are too many mechanical breakdowns and it takes much too long for rescue buses to reach the breakdown. I recommend sending out a rescue bus each morning to Toklat as a stand-by for breakdowns. This bus could go out in the morning as a transit bus and be dispatched for whatever emergency need arises during the day and/or return as an extra transit bus in the afternoon. Or simply, a rescue bus could be stationed at Toklat and the driver could be housed at Toklat or ride out from WAC on the first transit bus in the morning. 5

The distance and time to the first bathroom stop at Teklanika from the hotels is a big problem for (TWT) premium tours, especially in the spring when wildlife stops in the Primrose area are more frequent. I highly recommend the Primrose rest stop facilities be expanded for future premium tour use. With more buses going to Teklanika, the facilities at Teklanika will be heavily used. Expanding Primrose would help solve this critical issue.

Specialized Tours: I think it is a great idea to turn DNHT tours into Teklanika Tours. Please consider not using Primrose as an interpretive stop but as an alternative rest stop for Premium Tours.

Teklanika tour (DNHT) buses need to be upgraded. Lunches, snacks, drinks need to be upgraded. Hot drinks are difficult to manage.

If serving hot drinks continues to be an important priority, then please consider allowing a concession operated free hot drink Kiosk at Teklanika to alleviate this responsibility from individual buses. This could be small a bear-proof building. This service could be offered to all buses-premium, specialty, economy, and transit. The small cost could be factored into the price for all buses.

Ilike the idea of introductory tours offered to mile 17 as mentioned in Concept C. I made other comments about this above. Please add this idea to Concept B.

It appears DNHT tours would be converted to Specialized Tours under Concept Band to Premium Tours under Concept C, both with Teklanika as the destination. I think tours to Teklanika will be more successful as Specialized Tours with at least one interpretive stop. In the middle of the summer, the opportunity for wildlife sightings is diminished between Savage River and Teklanika because of seasonal migration, therefore interpretive stops will enhance the Teklanika Tour experience.

Proposed Strategies for all Concepts: I wish to comment on several of the strategies mentioned.

I endorse the standardization of bus driver training for all transportation providers. This will allow everyone to be on the same page as well as build camaraderie and a "we're all on the same team" idea for park road drivers. At times, there exists considerable friction between Aramark drivers and Kantishna lodge drivers.

Park road protocol(rules of the road) needs to be updated and refined. The rules are out-of-date. Many changes and improvements have been made in the past eight years to the Park Road that need to be addressed.

Fuel saving policies can be implemented by being flexible and adaptive in scheduling. I'm made suggestions regarding reducing buses being dispatched with too many empty seats.

We can improve the quality and understanding of wildlife opportunities by valuing the uniquely accessible wilderness experience Denali provides. I will say it once again; people come to Denali to see wildlife-especially bears. It's all about bears,bears,bears! They only need to see one bear and the sooner they see it, the better. It is not a good day when a bear is not spotted on a TWT tour. Buoyed by tour operators, wildlife expectations are very high. However, once that need is fulfilled, the visitor's 6

mind is open to understanding the NPS mission and embracing wilderness values and ethics. The visitor becomes teachable. Once his physical and psychological needs are met, he becomes receptive to all the fabulous learning experiences Denali National Park offers.

I support increasing the quality of Interpretation for key park themes and messages. Denali park road drivers support the NPS mission and Denali wilderness values. Because of their passion for Denali, most return for seasonal employment year after year. I encourage seeking ways to strengthen and enhance the bond between the park service and concession driver naturalists. Mutual support and same team sentiment will only enhance the NPS message.

The quality of interpretation can be improved with focused training and assessment. User friendly peer evaluation among driver/interpreters is also an effective tool. Some interpreters are more highly skilled than others and could serve as mentors. Higher levels of interpretive skill should be required for different tour options.

Being a park road naturalist requires skill and proficiency in two jobs-driving and interpretation. Presently driver naturalists are compensated for only one job-driving. Becoming a Certified (CIG) Interpretive Guide adds only $1.00 per hour to the driving salary. In order to improve the quality of interpretation, adequate compensation for interpretation needs to be addressed. In the next concession contract 1 recommend NPS stipulate that driving and interpretation be recognized as two distinct jobs and compensated accordingly.

Potential management options for other vehicle use? I agree with all of the potential changes for managing vehicles outside the public bus system. The more the Transit system is utilized, the better. have already commented on NPS operational access, contractors, artists in residence, and professional photographers. I believe all should use the transit bus system.

Of the strategies for managing Kantishna in-holding access, I favor expanding the public bus system to cover day trips and overnight trips to transport guests for Kantishna

properties. As an alternative,1 accept issuing one concession contract for transporting day use guests to Kantishna lodges, and issuing four concession contracts for transporting overnight guests to Kantishna lodges.

Regarding access to Teklanika campground, am very much in favor of reducing camping permits by 50% of current level with a minimum three night stay and phasing in tent camping only. All Teklanika campers use the public bus system to access the campground. Great idea!

Additional suggestions or concerns:

Road Lottery: How is the Road lottery congruent with the Denali Park Road Vehicle Management Plan? The answer is-it isn't. The Road Lottery contradicts everything Adolph Murie stood for and the goals DNP management aspires to achieve.

Last year when the park service was asked about the viability of the Road lottery, the answer given was, "Tile Road Lottery is a special event, marked by extenuating boundaries. The event meets the park's 7

Expectations to provide access to local communities, yet is now within a manageable scope of protection. The resources are better protected, and visitors are assured a safer driving experience."

The park service also said, 'From the inception of the shuttle bus system in 1972, visitors could access buses on a first come first serve, walk? in basis only. 'Coupons' or tickets for the shuttle bus seats were only available two days out. Those seats went fast, leaving 'same-day' visitors unable to obtain tickets. The Fairbanks and Anchorage (local} residents could not compete with the outside visitors for campgrounds and buses because of the walk-in only system. During peak season, bus tickets and campgrounds were full two days in advance."

"Local Alaskan residents felt that non-Alaskans had more access to this Alaskan park than they did. In an effort to appease local sentiment, pork management allowed private vehicles into the park after VTS stopped running for the season (First Friday after labor Day), for travel all the way to Kantishna, weather permitting. (Current contract stipulates VTS operate through the second Thursday after Labor Day}."

"In 1989, on the Saturday after the close of VTS, over 1,600 vehicles showed up at the park. Traffic backed up at? the Savage Check Station as rangers spent approximately 5 minutes per vehicle explaining the rules of the road. Once past the check station, some followed the rules of the road. Some didn't."

"Throughout that day, the rangers on duty were overwhelmed with cars off the road, out of gas, and flat tires. Trash overflowed trashcans; people didn't manage their food, camped out of bounds, and harassed wildlife. A fox, a mature Dall ram, and lots of ground squirrels were struck and killed."

"During the debriefing of the 1989 post season road opening, the lottery idea was developed. Originally, the lottery idea was designed for local (Alaskan) folks and basically was stated that way. It wasn't advertised internationally, nor was it in the Alpenglow. It was decided that there would be a 4-day weekend with 1.600 cars, or 400/day beginning in 1990."

"In 1995, with the implementation of pre-reservation options, in-.state residents could equally compete for reserved seats on the shuttle buses. The Road Lottery interest has increased beyond the Alaskan boundaries. Applications have increased from 4-7,000 entries received during the first few years, to 15,000 applicants/ year. 2002 fwd a record 18,500 entries for these 1,600 slots!"

Hindsight is 20-20. There's no value in criticizing the past. I understand the politics. But, times have changed. Many, if not most, of the reasons for establishing the Road Lottery don't exist anymore. The self-perpetuating motivation for the program is the word "LOTTERY". It's human nature. Lottery implies luck. You get something for free in exchange for taking a chance with a small amount of money. It implies getting something you can't get any other way. And that is, driving your own car into the park. You enter, you pay, and you win. Whoop-ti-do!

Correspondence ID: 176 **Project:** 22494 **Document:** 42309
Received: Oct,20,2011 12:08:42

Correspondence Type: Web Form
Correspondence: PLEASE TAKE NO ACTION ON VEHICALE MANIGMENT PLAN THANK YOU

Correspondence ID: 177 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,20,2011 18:41:22
Correspondence Type: Web Form
Correspondence: I am strongly in favor of Plan A. Leave it as it is. Thank you

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Correspondence ID: 178 **Project:** 22494 **Document:** 42309
Received: Oct,20,2011 21:53:03
Correspondence Type: Web Form
Correspondence: My preference is alternative "A", no change. Thank you,

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Correspondence ID: 179 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,22,2011 13:53:14
Correspondence Type: Web Form
Correspondence: I think that the current system is generally working well and would like to see it continued, although a system to monitor impacts and to be able to make changes in traffic in response to negative impacts would be acceptable. Of the alternatives proposed, Alternative C would be my choice.

Correspondence ID: 180 **Project:** 22494 **Document:** 42309
Received: Oct,22,2011 18:45:55
Correspondence Type: Web Form
Correspondence: I am a professional photographer who has been participating in the Professional photography permit program for the last 10 years. My time in Denali goes back much further ? I have been visiting the park usually multiple times a year for the last twenty years, with my first visits to Denali going back to the 70's with my parents.

Thanks to my history with Denali, I truly recognize what an honor and privilege it is to be able to qualify for, and take advantage of the Professional Photography Permit Program. There isn't a day that goes by when I'm in the Park that I don't remind myself how blessed I truly am for this opportunity.

I know the Professional Photography Permit Program has been slowing reduced over the years, and I'm writing in support of maintaining the current system. What many people don't realize is such a permit system is necessary to do our jobs, for a variety of reasons, but there are a couple of main ones that I would like to touch on.

First are the hours. Most quality photography is done in the first and last hours of light each day, long after the shuttle buses have returned. There have been many days where my schedule is completely reversed ? sleeping at Tek during the day, taking photos at night. These needs are not close to being met with the proposed changes.

The amount of equipment needed does not lend itself to the bus system. My huge telephotos and tripods are just the start. Now I find myself shooting more 3D video, which means I have to double everything from cameras to lenses. My gear alone would take multiple seats.

Quality wildlife photography involves a lot of waiting for just a few key moments, moments that rarely happen during the brief time a bus stops for a viewing. With the permit, I am able to remain safely by my vehicle while watching animals like bears or wolves. Without such a system these options and safety net go away.

I know some people don't understand why photographers would need special access, but this is a common practice. From sporting events, to wars and natural disasters, professional photographers are giving special access to help tell the story. The stories our images tell about places like Denali benefit us all. Not only do they bring future visitors, but they also help with park funding, conservation awareness? the list goes on.

Frankly, people want to protect, maintain, fund and visit places they know, and for most people, they will only know Denali through our photography and videography. It would be a mistake to greatly reduce the quality of these images with the elimination of the Professional Photography Permit Program. I think with only 5 permits a day we are at the bare minimum. Now I wouldn't have a problem if the qualifying standards were increased so that those 5 permits were given to those photographers meeting the highest qualifying standards and are the most widely published ? this would be fine by me. But to decrease that number from the current level would be unacceptable. This

is why I recommend you keep with Alternative A, and not make any changes to the current road system.

Thank you for your consideration,

Correspondence ID: 181 **Project:** 22494 **Document:** 42309
Received: Oct,22,2011 23:32:26
Correspondence Type: Web Form
Correspondence: Denali National Park is unique in the park system given that most of its visitors come from afar and are delivered to the doorstep by a couple of travel firms that specialize in travel to Alaska. The present system of buses while good for those visitors traveling with those firms, It makes the park extremely unfriendly to visitor from the local area. This has contributed to the negative impression the park service is held here in the state with the largest amount of parks. I'm concerned that the park system will expand the travel opportunities for the visitors who travel with Princess or Gray Line at the expense of local visitors, therefore I find myself wanting to see the park service institute no changes that will detrimentally effect the park usage by local visitors. Given the generally negative view the park service has in Alaska, it would be nice if greater effort would be given to attract more local visitors. When I've pointed out my concerns at the various meetings I've attended to park service personnel, I'm always referred to the fact the park is open to Teklanika in the seasons before and after the buses are running and the road lottery. While the spin is to place a positive on these activities, that some 1600 vehicles are allowed in on those 4 days, I would point out that roughly 9000 applications are turned away. The park only open to Teklanika before and after the buses are running has the problem is that all of the best scenery and animal opportunities occur past Teklanika. So, I suspect the park service plan to improve the experience by measuring the numbers of vehicles in view etc. are simply another method to provide better service to the Princess traveler once again at the expense of my opportunities. So handicapped as the present system is for my opportunities, I'd rather leave things as they are than risk another public relations means to reduce my opportunities to increase the profit margins for Princess and Gray Line. Changes that I'd like to see are fewer vehicles with special privileges going into and out of the park. I believe that if it's decided that the only way in the park is the buses, then everyone should ride the buses, from the park rangers, to the guys working on the roadway, to the folks manning the various stops in the park and use the same bus system to provide access to the expensive stops around Kantishna. Photography is a portion of my income, selling photos of Alaskan Wildlife, however, because I haven't attempted to get published, I see photographers from afar afforded photographic opportunities I am denied even though Denali is my local national park. So rather than the present program based upon publication, I'd rather see a photographers bus (one that you can really shoot from rather than the windows that don't work and are always in the way). Have it spend much longer on the road, say start at 4:00 am and come back at midnite, or even make it a several day trip for a group photographers who can jointly decide when and where to stop and how long to stay. I'd like the manner to select who gets to go to be based as much on desire as it is on publications.

Correspondence ID: 182 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,23,2011 01:00:10
Correspondence Type: Web Form
Correspondence: Alternative A, no action, is the preferred option per the planning document because it offers the highest level of individual use and access to the park.

The plan does not adequately address the need for individual access and use of the park. Rather the focus is on moving the mass of tourists who are typically on an organized tour.

The plan should have created two different plans. One for the one day tours and one for the person who wishes to experience the park.

I recommend no action pending further develop of a plan that addresses the needs of both users.

Thanks

Correspondence ID: 183 **Project:** 22494 **Document:** 42309
Received: Oct,23,2011 18:45:28
Correspondence Type: Web Form
Correspondence: We support Plan A and oppose Plans B and C for several reasons. First, it appears Plans B and C, particularly B, would significantly financially benefit the Park concessionaires to the detriment of the wildness of the Park. Since parks (federal and state) are facing budget cuts across the country, expenditure of this level of money is unreasonable when the result would be to increase the number of buses in the Park, which we oppose, and also, therefore, to increase revenue for private industry (primarily). Indeed, we are quite concerned that Plans B and C represent industry efforts to further exploit the Park.

Second, it already seems that there are too many buses in the park. As Alaskans, we try to see the Park every year and we appreciate how lucky we are to be able to do this.

But, no matter when we travel there - from May, before the tourist season really gets going, to September, at the tail-end of the season - there seem to be more and more buses. We want as many people as is reasonable to enjoy the Park, but too many buses takes away from the wilderness experience for all of us and must adversely impact wildlife. Further, we ask whether you have ever given any consideration to how many people actually observe wildlife throughout their bus-ride? Inevitably, it always seems to us that a third of the passengers sleep through the second half of the trip! Is this the best use of the road access? Perhaps the videos on the buses are designed to maintain passenger engagement, or to otherwise help the visitors enjoy their bus ride (or maybe they're just another way for the concessionaires to make more money?), but to us it seems that people might as well just stay home and watch a DVD on Denali! Third, although this may seem contrary to us wanting to limit the number of buses in the Park, we oppose limiting/doing away with the extremely limited private vehicle access to the Park. We visit the park pre-season specifically because we can take our time driving in to Teklanika. The very few times we've won the lottery (despite many applications), we've really enjoyed having private access to the full road. We like to be able to take our time to stop for wildlife (longer than the buses often do these days because they're restricted to their schedules) and to teach our children how to be quiet in the wilderness, and to experience it fully. We treasure these visits where the tour buses are minimal and we can quietly view wildlife on our own. This is one benefit that should remain for Alaskan residents, especially the children who are the future of the Parks. Further, when we do visit the Park this way, we fully respect the wildlife and the other visitors to the park. Indeed, our presence in the park is positive, because we often help other visitors spot wildlife, since we have more experience in doing so, and because we also know a little bit more about the park than others, from all of our visits and our interactions with Park Rangers. Our elementary school-age children have become mini experts on the Park and have received several Jr. Ranger badges, which they take very seriously. Our children are learning how to be the Park's future caretakers! In conclusion, we support Plan A, oppose increasing the number of buses in the Park and oppose limiting or eliminating private vehicle access in the Park.

Correspondence ID: 184 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,20,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Comments for Denali NPS on Vehicle Management Plan: October 19, 2011

To whom it may concern: I am a year-round resident and land owner in the Stampede area, have worked for Denali as an NPS employee from 2004-2008 and am a member of the Denali Citizen's Council. My concerns about the park road management plan stem from my deep attachment to Denali's backcountry and my hope that its wildlife character be strongly protected while retaining affordable access for the average visitor. I support Alternative A, No Action, not because I think the status quo is perfect'indeed, I do not, and I support the NPS's desire to create a capacity that more accurately reflects actual park use, and incorporates adaptive management strategies. However, both Alternative B & C fail to adequately address my concerns about consistent management for wilderness character, and affordable access. My two most specific concerns about the alternatives are as follows:

1. Neither B nor C provides the "safety net" of a firm capacity limit for the park road. Although adaptive management is appealing in that it clearly links capacity to data and is less random than the arbitrary 10,512, I would like to see adaptive management used over a 2-3 year period to generate the data necessary to determine a new, appropriate capacity that addresses the current traffic that falls through the cracks in the current plan, (ie, photographers, NPS traffic). Because of the budget increase required to fund, interpret and enforce annual monitoring, the proposed alternatives feel cumbersome, unlikely to respond quickly to oversight and overreach, and too open to the vagaries of politics which could change both the tone of park leadership and the budget available for monitoring. I do not support a plan that has no numerical "safety net," and thus requires that the public trust the NPS's general good intentions. I have seen a general erosion of commitment to wilderness management over the last ten years, which worries me, and for this reason I will only support a plan with firm capacity limits that are informed by adaptive management strategies. 2. Neither B or C unequivocally supports an affordable transit option for independent travelers on a budget. Both options feel too heavily weighted towards the interests of industrial tourism. The current transportation option is already financially onerous for many Alaskans. After I quit working for the park and lost my free bus ride privileges, my travel in the park has been severely curtailed because of the expense of bus travel, particularly when bringing family members and visitors. This is a shame. Park access must remain feasible and travel prioritized for all visitors, not just those on tours. In conclusion, I support the park's desire to update the road capacity to a level that is based on adaptive management data, but I cannot support either of the two options without serious changes. I support the critiques and recommendations to the plan as articulated by DCC and if I'm hearing my community right, many of us in the region feel similarly. If the park listens to the comments along these lines and makes a good faith effort to draft an alternative addressing these concerns, I will definitely reconsider my support.

Correspondence ID: 185 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,24,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I think Proposal A along with a continuation of the current vehicle cap of 10,512 is the best option to protect Park values and keep costs down. Keeping the vehicle limit is vital to road safety, air quality, wildlife protection, and maintaining a quality experience. There are too many people wanting access and it is a simple fact that the Park cannot accommodate everyone. A limit is necessary to protect the Park. Maybe a new system for managing the vehicles is necessary, I don't know, but like many fragile things, we have to limit use to protect it. Maybe it is time to develop non-polluting ways to visit the park, like electric conveyances, even a rail system along the road.

There may be some tweaking that would make things run more smoothly and maybe getting together an experienced group of people who have worked in the park along with some frequent visitors that could examine the current transportation and see what adjustments might make it better. From my personal experience the best part of the transportation system was the yellow buses that gave visitors the freedom to get on and off with gear throughout the Park. The tours were too regimented for hikers and backpackers, but maybe a good experience for those visiting on guided tours.

So bottom line, stay with Plan A and the vehicle cap, a cost effective, simple plan that seems to have worked fairly well for a long time. Funding is tight and likely to get tighter. Don't do a bunch of grandiose transportation schemes that are going to be too complicated and costly to manage. The bulk of Park money needs to stay with the core mission to protect the habitat, continue wildlife research, and provide a good, educational, and enjoyable experience for visitors.

Correspondence ID: 186 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,20,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Road use? Get rid of the buses and put in a monorail system. It would clean up your diesel dust polluted park and turn it into the wonder nature made it. Hope you'll see the light through the haze. It is my belief that in time a monorail has to be the prime mode of tansportation. At this point it would be a good Jobs Program, funding may be there.

Correspondence ID: 187 **Project:** 22494 **Document:** 42309
Received: Oct,24,2011 18:27:42
Correspondence Type: Web Form
Correspondence: I cast my vote IN FAVOR OF ALTERNATIVE "A" NO ACTION

The Denali Park reached reasonable carrying capacity long ago and now we need to move to protect the Park from overuse. One should consider it a privileged to visit Denali once in their lifetime.

Denali is a jewel that needs to be preserved, not whored to the foreign flagged cruise ship syndicate operating in Alaskan waters.

Correspondence ID: 188 **Project:** 22494 **Document:** 42309
Received: Oct,24,2011 23:17:28
Correspondence Type: Web Form
Correspondence: I have been to the Park and the current system is great! No more cars!

Correspondence ID: 189 **Project:** 22494 **Document:** 42309
Received: Oct,25,2011 14:00:41
Correspondence Type: Web Form
Correspondence: I find it disheartening that you are wanting to remove vehicle passes for professional photographers and only providing them to tour companies. From my understanding, this change to the program will INCREASE the expenses that the park has to pay to maintain it, by upwards of $1,000,000 a year. That a park official stated that there is no need for any to photograph the park as there are enough photographs taken over the years not only shows ignorance but a closed minded stance towards art. The park is constantly changing, it isn't the same park from year to year. This changing park hasn't been fully documented with photographs as it isn't the same from year to year.

Also, there are numerous points of view that different photographers will have as well as they are trying to tell different stories about the park.

Do not continue down a path that could be considered a violation of our 1st amendment rights. This is also a form a discrimination as you will be giving all vehicle passes to tour groups and discriminating against photographers.

Correspondence ID: 190 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,25,2011 14:24:03
Correspondence Type: Web Form
Correspondence: In reference to the draft vehicle management plan my current support is with alternative C, however I do have a few comments/questions regarding the plan.

1. What would be the approximate cost and or percentage increase of the self guided economy tour? My concern is overpricing the bus trip for visitors wanting to access the backcountry either overnight or day use.

2. What control would the NPS have limiting Kantishna lodge busses? I see that they would be under a commercial use agreement, does this agreement provide for regulating use?

3. I agree with the parameters set forth in managing other vehicle use in alt C. Decreasing filming and professional photography vehicle use is prudent. I agree with formalizing off peak travel for west district employees, however it may be more problematic with TEK campers. This section of the road is wide enough to accommodate RV and bus traffic. Most TEK campers arrive after hours but adding a restriction seems like overkill. What about eastbound TEK campers, do they have to travel off peak as well? That would be very problematic since most TEK campers leave eastbound in the early AM.

Although this is not covered in the plan, why does the concession company not utilize GPS/Real time data to track # of passengers on any given bus? It seems that if this data was available to concession bus dispatchers and transportation managers an increase of efficiency would prevail. Long waits along the road especially during sunny days when folks are hiking could be reduced if the concession company had real time data. As it stands now, concession dispatchers must wait until a bus arrives at Eielson to determine ridership.

Thanks for the opportunity to comment.

Correspondence ID: 191 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: I have some comments about the proposed Denali Park Road Vehicle Management Plan

The plan should not be set in stone for 10-15 years. Maybe 3 years at a time, it should be a work in progress. Ideas on paper can be different than reality.

There are good aspects to all of the plans. If we could pick and choose that would be best. As it stands Plan "A" is the best option.

The transportation system works well now. The VTS moves people aournd the park that wants to and the tours work well for folks that want a little more structure. Its the timin gof the busses that need to be worked on. Please remind the concssionaire that they are here for the benefit of the National park System and the visitors not to get rich and go away.

Having 2 separate bus systems works. Leave them on 2 separate busses. Combining systems can and will leave some folks feel like second class citizens. The VTS bus driver can and often do give a good tour but there is no incentive. They are told to 'shut up and drive'. The VTS tour is more "off the cuff" than the wilderness tours often are. Both can be a very positive experience for the visitors.

I see many problems with putting personal items like backpacks and coolers on the outside of the bus. Dust, rain, birds, bears, and theft come to mind.

I do not believe that electronic media will be a good experience for the visitor. The public address system doesn't always work well. Folks are encouraged to leave the electronic world behind and then you give them headsets.

The busses should be smaller. If it is "All about the visitor" then the trip should be as personal as possible. There is nothing like having a small group of folks and a knowledgable bus driver. 20-25 folks per bus is an ideal number.

Getting rid of the old 10512 number is a good idea. Moving toward a number of buses or vehicles per hour is a good idea.

Employees are needed to keep the park operational and the visitors happy and safe. They s hould be able to access their duty station when they need to. Each dept. has their

own needs and that rolls on down to the employees. Days off, time of day, bags & coolers for groceries make commuting on a shuttle system a difficult commute for folks. Adding a 3 hour ride each way commute is a lot to ask from employees short weekend. If we were on the clock and able to travel in small groups and large vehicles that might work. But it should be experimental. As a roads employee, making special projects work within our dept and coordinating with other depts. can be a challenge. Then there are the mudslides, snow storms and other unplanned events.

Giving employees the option to travel during low volume hours is a good idea. After 6pm and before 8am seems reasonable and practical and safe.

i believe film and video are all prophos and should be under 1 type of permit. 2-3 per day maximum and let them go wherever they want to.

The Kantishna businesses should be given a set number of permits (3 per day?) and let them figure out where and when. Also somehow encourage them to go in and out during low volume hours also.

The Teklanika campground should stay the same. The 3 day minimum stay works well. If there are going to be Tek tours all summer they should be counted against the conessionaire's total number.

Correspondence ID: 192 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,25,2011 14:48:09
Correspondence Type: Web Form
Correspondence: I am writing to comment on the "Denali National Park and Preserve Vehicle Management Plan / Environmental Impact Statement". I strongly oppose Alternative B (Optimizing Access) for the following reasons: ? Alternative B does not allow for easy access for hikers and backcountry users. The decision many years ago to limit park road access to buses only was made to limit impacts by individual vehicles and limit traffic, and was not meant to limit access of individuals to the park. However, Alternative B does limit access to the park by those individuals who wish to experience more of the park than just looking out of the window on a bus. The transportation system is the only way to access the park; therefore it must be managed so that it is inclusive to all park visitors. ? Lack of camper buses. The plan states that "strategies would be explored for carrying recreational equipment (e.g. backpacks, camping gear, bicycles, etc.) on the exterior of the buses". This is flawed for a few reasons: o Alternative B limits carrying capacity for campers and backcountry users. o Anyone who has seen a bus after miles of riding on the park road will realize that camping gear and backpacks will be in poor condition when they arrive at their destination if carried outside the bus. Who wants to start a multiday backpacking trip with gear that has been soaked or covered in dust/mud from riding on a bus? Or invest in expensive dry bags to keep their groceries dry for their trip to Wonder Lake Campground, when currently a cardboard box will do? o Alternative B plans to make Teklanika a bus access campground. Alternative B greatly increases the volume of campers needing a bus ride to their campground while at the same time cancelling the bus service that is supposed to serve this campground. ? Teklanika campground. Alternative B phases out the ability to drive to Teklanika campground. As someone who has stayed in Teklanika campground the past two years I feel this would be a huge mistake. Teklanika allows senior citizens, those with disabilities, and those with small children the opportunity to have an overnight experience in the heart of the park. Without the ability to drive to Teklanika campground only young, healthy individuals who are able to carry their gear into the backcountry or haul all of their camping gear onto a bus and then to a campground would be able to enjoy a night spent in heart of the park. The goal of the National Park Service is to be as inclusive as possible; this decision is a move to exclude a large percentage of visitors from the opportunity for a quality park experience. ? Adaptive Management. I oppose adaptive management of park road access. There are not enough resources currently available to properly gather all of the required information needed for the park service to make informed decisions on adaptive management, and with possible decreased federal budgets in upcoming years this problem will be become worse. In addition adaptive management is a very subjective process that will be easily manipulated by political influence instead of taking into account what is best for the park. ? Increased barriers to local community members. As a resident of Talkeetna, Alaska I am a short drive away from the park and enjoy visiting the park a few times a year. I feel that there are already many barriers to entry into the park for visitors: high cost of entry fees, high cost of bus service, and need for reservations for bus and backcountry access. Alternative B only increases these barriers. While the visitor from outside the state of Alaska may only come to Denali one time and so extra cost and hassle are not a big consideration for their "once in a lifetime experience", those of us who visit the park on a regular basis cannot bear these extra costs and hassles of advance reservations. ? The main party that will benefit from this plan will be the transportation concessionaire, not the public. This plan creates a system that maximizes concessionaire profits at the expense of a quality visitor experience. I strongly support Alternative A: No Action (Continuation of Current Management) for the following reasons: ? Alternative A allows for easy access to the backcountry and hiking opportunities. ? Alternative A provides low cost options for accessing the park, which is especially important for those of us who live close to the park and visit many times a year. While the visitor from outside the state of Alaska may only come to Denali one time and so extra cost and hassle are not a big consideration for their "once in a lifetime experience", those of us who visit the park on a regular basis cannot bear the extra costs and hassles of advance reservations in Alternative B. ? Teklanika campground. Teklanika allows senior citizens, those with disabilities, and those with small children the opportunity to have an overnight experience in the heart of the park. Without the ability to drive to Teklanika campground only young, healthy individuals who are able to carry their gear into the backcountry or haul all of their camping gear onto a bus and then to a campground would be able to enjoy a night spent in heart of the park. The goal of the National Park Service is to be as inclusive as possible, Alternative A does this. I do not support Alternative C (Maximizing Visitor Opportunities) for the following reasons: ? Adaptive Management. I oppose adaptive

management of park road access. There are not enough resources currently available to properly gather all of the required information needed for the park service to make informed decisions on adaptive management, and with possible decreased federal budgets in upcoming years this problem will be become worse. In addition adaptive management is a very subjective process that will be easily manipulated by political influence instead of taking into account what is best for the park ? Increased barriers to local community members. As a resident of Talkeetna, Alaska I am a short drive away from the park and enjoy visiting the park a few times a year. I feel that there are already many barriers to entry into the park for visitors: high cost of entry fees, high cost of bus service, and need for reservations for bus and backcountry access. Alternative C will increase these barriers by increasing costs for the transit option and potential increases in the cost of economy tours. While the visitor from outside the state of Alaska may only come to Denali one time and so extra cost and hassle are not a big consideration for their "once in a lifetime experience", those of us who visit the park on a regular basis cannot bear these extra costs and hassles of advance reservations. The transportation system is the only way to access the park; therefore it must be managed so that it is inclusive to all park visitors. ? I do like several things about Alternative C, and would support it my concerns above were addressed: o Teklanika campground. I think it is important to keep Teklanika campground as a drive in option that will allow those physically unable to haul their gear to and from a bus to experience a quality overnight experience in the heart of the park. Alternative C makes a good compromise between keeping this camping option open and reducing traffic flow during peak periods. o Emphasis on providing flexible options for visiting the park. Thank you for considering my comments.

Correspondence ID: 193 **Project:** 22494 **Document:** 42309
Received: Oct,21,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Sir,

With my limited understanding of the Draft Denali Park Road Vehicle Management Plan, I would like to express my experiences as an Alaskan resident visiting the park. Back in the 70s the park was accessible by free shuttle buses. Like today you can embark and unload at any point along the road. Walking the road between bus times continues to be a great quiet experience. Times along the road between buses can sometimes be 1/2 hour. There are many buses traveling that road today. Why would we want the times between buses to be shorter? I for one would like to see fewer buses going back and forth allowing more time between shuttles. It seems the parks these days are run on economics. Yes it is expensive to run the shuttle operations. But as a visitor to the park it has become increasingly more expensive to visit. (Getting?) to the park, camping fees, shuttle costs. Its a $100/day per visitor. I spend sometimes a week at the park and frequent Denali throughout the year. Once tourist season ends the park is economical for Alaskans but, of course, accessibility to the far ends of the road cannot be experienced.

As a tent camper I've found out that all the "campsites" are reserved and end up in the walk in at Riley. Having to park the car up at the visitor center is a small inconvenience but always I note unoccupied campsites the following morning. Whatever happened to 1st come 1st served? The park has catered to the RV camper and Princess groups more and more. Economics I suppose dollars for the park but isn't the real experience supposed to be a surprise less. Less management usually works out the best. Simple is better. We don't need more buses or more crowded buses. We need less action or no action. If the buses are less frequent and the park economizes maybe we can award the concessionaires like Aramark fewer guarantees. Our national parks need to remain free and open to the general public not run like amusement parks and money generating ventures.

Run the buses less. People will still come to the park.

I support no action on the Draft Denali park Road Vehicle Management Plan.

Correspondence ID: 194 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,26,2011 11:26:12
Correspondence Type: Web Form
Correspondence: When considering changes to the existing Wilderness and Backcountry Management Plan for this area a number of issues need to be considered. Chief among those is the relative impact groups and group size have on the environment. With repsect to non guided parties climbing in a given area, practically speaking, there are no enforcable regulations to group size and the actions of group members on managed lands. In contrast guided parties are typically limited in party size, display excellent stewardship behaviors and are generally more educated about rules, regulations and such things as LNT practices than their non-guided counterparts. These factors clearly delineate guided parties as the more eco friendly and attractive groups from a land management perspective. To argue otherwise is irresponsible.

Therefore, any measures to restrict guided access in favor of non-guided access is likewise irresponsible, antithetical to land management policy and should be aggressively discouraged.

Correspondence ID: 195 **Project:** 22494 **Document:** 42309

Received: Oct,26,2011 12:49:24
Correspondence Type: Web Form
Correspondence: Re: Comments on the Denali Vehicle Management Plan

Thank you for extending the comment period on the Denali Vehicle Management Plan to October 31 because late September is always a difficult time for many Alaska residents to review and comment on documents as voluminous as the plan.

I support Alternative A of the Denali Vehicle Management Plan for the following reasons:

1. I do not see sufficient concern expressed by the public in the Road Capacity Study about current road management to justify the changes proposed in Alternatives B and C. 2. I do not believe the biological monitoring systems, such as sheep crossings, etc, are scientifically rigorous to provide sufficient evidence to allow adaptive management of future changes to road use. Given that the proposed monitoring systems are inadequate, there is too much emphasis in Alternative's B and C on future adaptive management which does not give the public sufficient input on future changes to the road management. 3. Portions of Alternatives B and C increase the cost of access to the park for the public, particularly lower income families, and makes access to the park too expensive for the general public. 4. I am opposed to the planned closing of Teklanika Campground to access by private vehicles in Alternative B. 5. I think the bus scheduling spacing systems proposed in Alternatives B and C are overly complicated and will break down as soon as vehicles start stopping to look at wildlife on the road. Also, strict adherence to a bus schedules and spacing would likely mean reduced wildlife viewing time for tourists which would greatly detract from their experience viewing wildlife in the park. 6. There is little emphasis in the plan on accommodating the growing interest in digital photography by the public. Attempting to photography wildlife in the park is current very difficult and almost unworkable and I think Alternatives B and C would exacerbate the problem. I would like to see more emphasis placed on providing opportunities for recreational photography. 7. I do not concur with the proposed restrictions on professional photographers in Alternatives B and C. 8. I would like to see a thorough review of extension of the park road into a loop as an Alternative. 9. In general, I think the plan was poorly organized and difficult to review. 10. I think too much emphasis is being placed on the tour bus concessionaires. In fact, the plan and thus park management, could be accused of putting too much emphasis on private concessionaires at the expense of the general public.

Thank you for the opportunity to comment on the plan.

Correspondence ID: 196 **Project:** 22494 **Document:** 42309
Received: Oct,26,2011 00:00:00
Correspondence Type: E-mail
Correspondence: At this time, I feel I can only support Alternative A, which is no action. We have a saying," if it ain't broke, don't fix it." I apply that to the Denali Park Road, that I have had the privledge to drive numerous times of the past 40 years, both private vehicle and so often by bus. Plans B & C would require far more funding, in a time of declinging funds. It doens't make sense. The national Park Service made a very specific agreement with the public in 1971 -- we gave up private vehicle access and the Park would provide bus access for free. That of course, has changed. But, I object to encouraging even more bus service to accomodate the Cruise industry. This industry has for years had a closed circuit in the State, and I feel it is wrong for the National Park Service to now try to accomodate them more than is now the case. Please don't cheapen the Denali experience. Any plan that would increase the number of buses on the park road should be disallowed, as I believe that would negatively impact wildlife, and the experience that bus riders today enjoy. Please do not compromise our precious Denali National Park. Please support only Alternative A.

Correspondence ID: 197 **Project:** 22494 **Document:** 42309
Received: Oct,26,2011 00:00:00
Correspondence Type: E-mail
Correspondence: To Whom it may concern,

Please take the following comments into consideration for the vehicle management plan: 1) There needs to be a specific limit on the number of vehicles traveling the park road. 2) All current options pander to the wealthy and restrict access to the poor. 3) The character of wilderness experience is enhanced by the current nature of the park road past Eielson. 4) Long-term (25+ Years) planning should consider electric light rail transportation as a replacement for bus and individual vehicle traffic.

Correspondence ID: 198 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,26,2011 21:58:44
Correspondence Type: Web Form
Correspondence: I would recommend Alternative A.

Thank you

Correspondence ID: 199 **Project:** 22494 **Document:** 42309
Received: Oct,26,2011 22:27:59
Correspondence Type: Web Form
Correspondence: I have been a resident of Alaska since 1978 and have visited Denali NP on numerous occasions. I am in favor of Alternative A and I am against rescinding the 10,512 seasonal vehicle limit. Although the NPS should be praised for considering greater visitor access to the park, it appears that the proposed plan (Alt. B and C) caters to premium tour groups and not as much to economy tours and independent travelers.

I do support the altermative to change management zoning of the park road between Eielson and Wonder Lake to keep it more remote and less used than the road from the park entrance to Eielson, as proposed in Alternative C.

Although not addressed in the plan, I also support the development of more hiking trails in the park to allow visitors to experience the park on foot rather than in a vehicle.

Thank you for allowing me to comment on the Road Vehicle Management Plan. I have been an admirer of the NPS for decades.

Correspondence ID: 200 **Project:** 22494 **Document:** 42309
Received: Oct,26,2011 23:30:29
Correspondence Type: Web Form
Correspondence: These are my comments on the Denali Vehicle Management Plan. I live in Fairbanks and attended one of the public sessions where the alternatives were discussed. I am in favor of leaving the road management as it is currently or Option A.

My reasons for this are:

1. Since I live in Fairbanks which is 2 hours away, my husband and I spend several weekends each summer in Denali. We have a small RV and usually camp at Teklanika Campground, 30 miles into the park. Teklanika is very convenient for staying 3-5 days with the Tek Pass which allows daily bus rides into the park. The first 30 miles of the road don't usually have much wildlife, so staying at Teklanika allows for shorter bus trips with more quality wildlife viewings.

2. I don't want Teklanika to be reverted to tent only as this would be very inconvenient. We usually drive to the park on Friday afternoon. We would have to catch a bus which probably wouldn't be running late enough on Friday as we don't usually get to the park until after 5 or 6 p.m. Not to mention that packing all the gear for tenting is much less convenient especially when you can't even have your own car with you. We don't see many older people tent camping in Teklanika and I'm sure even fewer would use Teklanika if RV's were not allowed.

3. My husband is an amateur photographer so we ride the buses a lot. He would like to quality as a professional photographer eventually and both of the alternatives will cut down on this option. We would definitely be interested in photography tours where the buses don't run on set schedules and are able to spend more time with wildlife.

4. Both of the alternatives B and C cater to the cruise ship crowd and leave Alaskans at a disadvantage. This is our local national park and we should be able to visit when we want instead of having to make reservations weeks or months in advance. When we first moved here 15 years ago, we were able to drive to the park and take a bus without reservations but no longer.

5. We have noticed over the years that fewer Alaskans are visiting the park. Most of the people I know don't visit due to the cost of the bus and this is with the green buses. It costs us over $100 for a camp site and bus ticket for 3 days in Teklanika. We moved here from Denver and used to visit Rocky Mountain National Park regularly. It was very convenient and very cheap. Denali National Park should be available and affordable for all Alaskans.

Thanks!

Correspondence ID: 201 **Project:** 22494 **Document:** 42309

Received: Oct,27,2011 09:37:20
Correspondence Type: Web Form
Correspondence: Dear Denali Planning Committee,

I've driven bus (both tour and VTS) a total of 18 years off and on since 1981 in Denali National Park. I have seen a lot of changes in the park and am very nervous about the new Proposed Vehicle Management Plan. I love the park and would hate to see the wildlife and visitor experience deteriorate because of pressure from corporate interests.

I don't understand why we need to change something that works. There are certainly ways the system could be tweaked to make the experience better for both animals and tourists. For example spreading out the tour buses, and having buses on call if it is a day more folks are out hiking (for shorter on the road wait times). Maybe even have swing busses that could go to Wonder Lake or turn around at Eielson at the dispatcher's discretion.

The Economy Tour sounds like an awful idea. Certainly road guides (pamphlets etc) are a great idea for VTS riders to have available to buy, but a more expensive ticket and a ride with other visitors who pay less on the same bus sounds like a nightmare and a recipe for unhappy passengers. The simpler, the better for passengers to understand a system as confusing as this one already is. People already have trouble understanding the differences between tour and VTS and the different destinations. I beg of you, do not give people priority seating on VTS based on a higher priced ticket! Also, please, no taped tours for people to listen to while their driver may be trying to talk to them or give them necessary info throughout the trip.

I also don't think we need more study on the impact of buses on animals. Most drivers will agree that buses on the road do change the behavior of animals. Many animals have become habituated to the buses, but when going around a corner if an animal is in the road, even the most jaded animal is going to jump away. Frequent buses will cause even the most determined animal to sometimes change direction. THE LESS BUSES THE BETTER FOR WILDLIFE! But, the National Park Service Mission Statement demands that we provide for enjoyment of this and future generations, therefore, we put as few buses as we can get away with, (on the park road) and still keep people happy. I realize there are corporations who are demanding more access, but the saying "Build it and they will come", applies here. With proper advertising, there could be many more folks who want to come to Denali. That doesn't mean that they all should. There are many more beautiful places in Alaska that could be tourist destinations. I remember when the Holocaust Museum opened and there was a waiting list of a year in order to get in. The folks in charge had made the decision that the experience would be better if people had time to contemplate and take their time instead of being rushed through. Having lines of buses in a persons view shed takes away from the wilderness experience whether they know it or not. That wilderness experience might not be something they even consciously acknowledge at the time, but they will carry it with them when they leave. So, drawing a line in the sand can be a good thing for all involved. Industry can focus on the other exceptional opportunities and national parks in Alaska. Instead of choosing which bus to ride at Denali, maybe a better option for visitors would be choosing which national park to go to.

Don't get rid of the camper buses. Camping and backpacking gear should be carried inside the bus; visitors don't need to start out on their trip with wet or dusty gear.

Since road access is restricted, it is very important to keep transportation affordable. Money would be better spent subsidizing VTS tickets so folks without much money could be encouraged to come into the park.

Don't turn Teklanika into tents only. If wolves or bears start making problems the campground might be closed, whereas RV's etc could continue to camp there safely under those circumstances.

Don't allow an increase in the size of buses.

The one million dollars that would be spent each year for these plans is a lot of money and would be better spent on educational and interpretive programs. On the other hand, a good way to spend more money would be to give VTS drivers some education about the park. Before Aramark had the concession, the bus companies seemed to want the drivers to know about the park, and I remember getting paid to attend lectures and sometimes we were given tests to make sure we had a basic knowledge of the history and natural history of the park. Now that Aramark runs the shuttle buses, I suspect they don't want the VTS drivers to look knowledgeable, because they want people to buy tour tickets.

I want to be on record as supporting Option A. I do think the present system can be improved, but it has worked well up till this point and I see no reason to make so many changes right now.

Correspondence ID: 202 **Project:** 22494 **Document:** 42309
Received: Oct,27,2011 15:24:15
Correspondence Type: Web Form
Correspondence: After review of the road management plan and considering the increased amount of money and manpower to manage either Plan B or C to make it work, and the uncertainty or impossibility of "directing" sheep or any other park animal, to comply with either "quiet hours" or "vehicle gapping" or the like, not to mention the current budget slashing our Congress has undertaken, it seems that Plan A is the only logical course to take.

To deny access to Teklanika to visitors in RV's or personal vehicles (especially disabled people) sounds like an unannounced plan to increase bus traffic to Tek rest stop - and to get every one out of the way so tour buses can "meet schedules" that already cause speed limit issues, endangering everyone, including wildlife. Pushing more buses further into the park past Stony Dome and out to Wonder Lake - now that the road is wider - will ensure even more speeding buses. Most tour bus riders cannot even stay awake past Toklat - let alone Wonder Lake. With current west end/lodge traffic headed east - and an already dwindling number of moose coming to feed at roadside kettle ponds - good bye to moose visible from the road altogether.

Proposed adjustments to the already slashed ProPho program are designed to kill the program altogether - by making it all but impossible to realistically justify the expense of coming to the park from an economic and productivity standpoint. Objectivity by park management and staff in regards to both film and ProPho access had died off many years ago. Allowing unlimited concessionnaire video and photo access smacks of big money pressure and discrimination, not to mention an unauthorized level of "law enforcement" on the part of tour bus drivers who themselves operate unaccountable to anyone - as park ranger personnel driving the road have been slashed from roughly 5 or 6 down to 2 or 3. Anyone on permit "perceived" as violating any road rules is "guilty until proven innocent."

It would be interesting to know how the "artist in resident" who was captured on film outside his/her vehicle this past season - wthin ten feet of a grizzly - was dealt with. Rumor has it this was the "second" time this had been witnessed. An individual on film or ProPho permit would have been cited and permit revoked. What was the level of action in this incident ?

Implementing either Plan B or C - in my opinion - will speed up the already slow death of the wildlife experience in Denali, which has been taking place over the past 12-15 years. How can this be considered in keeping with the National Park Service Mission Statement ?

Correspondence ID: 203 **Project:** 22494 **Document:** 42309
Received: Oct,27,2011 16:09:27
Correspondence Type: Web Form
Correspondence: This summer my brother and his wife came to Alaska for the first time. The highlight of their journey was a three day trip to Denali Nat. Pk.. I hadn't been there myself for about 20yrs., and went also. The Green Shuttle Bus trips(2) into the park were very efficient, comfortable, and marvelous. I saw no reasons for necessary change. "If it isn't broken, don't fix it". Please take no action for now! Thankyou

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Correspondence ID: 204 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,27,2011 17:34:06
Correspondence Type: Web Form
Correspondence: I support Alternative A (no action).

Correspondence ID: 205 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,28,2011 00:00:00
Correspondence Type: Web Form
Correspondence: It pains me to say it because I do believe some changes would be helpful, but I can't support either Alternative B or C. Some of the ideas and possible future restrictions contained in these alternatives eliminate them as far as I'm concerned. I attended public meetings on this issue, and what I'm seeing in this document is a slap in the face to those concerned citizens who had viable ideas in favor of the demands by the "group" tourism industry.

Over and over in each alternative, it states ideas like, "The majority of seats would be available for pre-booking by all visitors", or "All visitors (both independent travelers and organized groups) would have the opportunity to pre-book a majority of transit seats, however; some seats would be retained to allow for spontaneous trip planning", and "Premium tours could be 100% pre-booked. Visitors without reservations would standby for seats". What I see here is the promotion of seat hoarding by group tourism, while the independent traveller, without dedicated booking staff and expert knowledge of the booking system, would be left behind, relegated to hanging around the WAC

on "stand-by".

Yes, I'm an Alaskan, and getting to and from the Park is not that big of a challenge, but every year when I visit, and do many times a year, I see the parking lots and campgrounds full of independent travellers who have travelled great distances and at great expense to be there. Are you requiring them to fully understand the bus system well before they get there so they can be sure to "pre-book"? And even if they do, what's the chance any "pre-book" seats will be available after the group tour company's hoard them all? It's bound to turn into the same scenario we see with popular public use cabins in Alaska, if you don't book that day(s) you want exactly 6 months in advance, you're out of luck.

Some of the proposed restrictions on other road traffic, I also can't support.

The proposed restrictions on professional photographers and videographers are too severe. I am not a professional in either of these specialties, but I understand their importance. For individuals who can't come to Denali, the contributions from these professionals provide an alternative. I think the proposed limitations would hamper that effort, and really the alternative you propose doesn't fit in with the changes to the busses you want to make. "Permit holders may be required to use the transit system to avoid displacement of visitor opportunities?", really? How will the professional be able to take quality photographs or video out of a tour bus? It's bad enough as an amateur to get a good shot when the busses are packed; I can't imagine how a pro with all his/her gear would be able to. That option is just silly to me.

The dancing around the idea of eliminating RV use of the Teklanika campground is also concerning. Teklanika campground provides one of the most unique experiences for a hard sided recreational camper. It allow those who can't tent camp, for one reason or another, the ability to experience as close to a back country camping trip as possible. Also, perhaps memory is short in DNP, but it wasn't that long ago when tent camping was eliminated due to interactions with local wolves. What happens if that happens again, the closing down of one of the best campgrounds in the park? That's doesn't fit well with charter to allow people to get the most out of Denali.

Some of the omissions concern me; there is no real information in this document on the shoulder season use by private vehicles. I suspect, by omission, the plan is to eliminate that and that would be too bad. Some of the best trips I've had in Denali were in May, driving to the Teklanika rest stop and then biking in further. Some of the best terrain for that is beyond mile 30, to lose that would be a shame.

Also, there is a decided lack on mention of the road lottery. Again, what is the plan there? Elimination in favor of bus traffic? I attended this season and was appalled that the "brown" busses were still running in full force right along with dozens of private vehicles. Conflicts happened, some of which occurred in just the first 15 miles. On one occasion, a brown bus was parked dead stop in the road, on a double yellow section with poor oncoming visibility. I was passing in the opposite direction and almost had a head on collision with someone trying to get around it, add to that when I did finally get by, the bus had a line of cars stuck behind him that was at least 20 deep. Passengers on that bus weren't even looking out of the windows, the driver was talking on his headset. They sat that way for a good 20 minutes, without a care in the world of what was happening behind them. That should not have been allowed, busses should not run during lottery. You place an imaginary restriction of 400 cars per day during lottery, but suddenly it's okay to runs busses at the same time? How does that rule get broken? It would be a shame to eliminate the lottery, that's a great experience for people. Pushing it back in favor of busses isn't a good idea either. If memory serves me, that's been done already, and we already have the risk of being "snowed" out. Move it again and that problem is worse.

You like to mention ideas like enabling visitors to engage with park resources and solve that but suggesting increasing "tour" busses. From my observation, those on the tour busses aren't that engaged anyway. They think the tour is supposed to be like a zoo and complain when they don't see anything. They complain about the "brush" being too high and needing to be cut down. I saw a group of passengers once, all taking cell phone pictures of the LCD screen in front of them of an animal, rather than looking out the window for it!

I don't see a lot in either B or C that makes me feel like you've met your stated goals above and beyond alternative A. I can take your goals and apply what is status quo today, and I think meet them fine.

Some of these Goals:

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

There are currently at least four variations of busses, Camper, VTS, NHT, and TWT. That doesn't include the Savage shuttle which can be used to explore the VC and such.

Seems like plenty of opportunity for "engagement" to me, meaningful is in the eye of the beholder I guess.

Provide a system that is universally accessible and able to accommodate visitor needs and equipment.

We have that now, Camper bus and other busses with handicap access. Enable visitors to easily choose the experience that meets their needs within the limits of the system. Between the booking through group tours and the independent traveller being provide so many chooses at the WAC, this seems to be covered?

Maximize system flexibility to meet future visitor demand, while sustaining desired resource conditions and visitor experiences.

Keeping a consistent Camper and VTS system, while modifying History and Wildlife to meet demand (e.g. more wildlife tours by reducing history tours) would meet this goal.

Provide stability and predictability in the system.

Seem like we have that now, I've always picked up a bus, be it Camper, VTS, or Savage Shuttle, on or near its scheduled time, even with wildlife stops. The area that has been a problem is in the overbooking of these busses so there are not enough open seats to accommodate those wanting to get back on.

Develop a system that is affordable and offers opportunities for the full range of park visitors.

Affordable? Are you suggesting that prices will go down with either B or C? I don't see that has possible and really the price's today are ridiculous for a family. Remember this bus system was something the NPS wanted, it was promised as a way for visitors to get into the park while preserving the ecosystem, and cost wasn't played into that decision. It started out that way, but has devolved into something else, driven by profit making concessioners.

Obviously, I'm glossing over the complexities of these issues, but I stand by my idea that I cannot support either alternative B or C, and as the only other alternative available, I'd have to vote for alternative A.

Correspondence ID: 206 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,28,2011 14:57:06
Correspondence Type: Web Form
Correspondence: Thank you for extending the deadline for comments on the Denali Vehicle Management Plan.

I have been a resident of Alaska for over 9 yrs, and have visited Denali numerous times for backcountry experiences and as a "road tourist." I have always had an enjoyable experience in the park, whether I have planned ahead or not. I think the bus system is a good way to enhance visitor experience by reducing traffic, providing an elevated platform for viewing wildlife and the landscape, allowing visitors to look at the landscape instead of focusing on driving, and providing information about the park and resources. I have overall been impressed with the bus drivers' knowledge and friendliness, whether I was on a shuttle or tour.

I recognize that demand for visitor access to the park has increased dramatically over the last decade and will likely continue to increase. Clearly there is a challenge in determining at what level of visitation a user is likely to experience a diminished experience, since that varies for everyone.

Because the road provides access to one of Alaska and America's greatest Wilderness areas, it is important to try to preserve the feeling that one is traveling in a wild, untrammeled landscape. While bumping along a dusty road with a bunch of tourists screaming "That's a big ol' bear!" isn't exactly a Wilderness experience of solitude, one would hope that most visitors would be able to imagine or realize a walk to that distant ridge or valley would provide such a Wilderness experience. I do not want see Denali's Wilderness values further sacrificed to accommodate more visitors. As with most good things in life, there is a limit and we have to expect to see the sign that says SOLD OUT.

Thus, my comments on the Plan include:

1. I generally support Alternative C. I do not agree with calling Alt B "Optimizing Access" as that alternative seems to be optimized for some user types (e.g. tour groups) but not spontaneous visitors, including Alaskans.

2. I do not support significantly increasing the number of visitors that can access the park. I perceive the limits to already be high even when I travel during non-peak visitation periods. In researching the question of how much is enough, I felt that the recommendations made by the Denali Citizens Council in their comments seemed like a reasonable approach to evaluating limits, including using a road capacity study to identify limits and then formalizing this in the GMP. I fear that if the park continues to modify this limit over time, it will be accepting a greater level of change as acceptable, and resources will be increasingly harmed. The DCC also suggested optimizing traffic patterns as use is modified, and that seems practical.

3. I support programs/opportunities to get visitors off of the bus and onto the land, including free or low-cost short interpretive hikes.

4. I support keeping some open seats on Shuttles and Tours for spontaneous trip planning. It is important that individuals with flexible travel plans can come to the park and have a chance at traveling into the park, or finding a campsite. Not everyone, either those that plan or those that don't, will be able to get what they want. There may be an economic benefit to the area when visitors have to stay an extra day or two to get the tour/shuttle they desire.

5. If there is adequate demand for Camper Buses, these should be continued as an efficient means for accessing Denali backcountry. Nevertheless, finding ways to accommodate some gear on the outside of the Shuttle and Tour buses would be desirable, including bikes on the front and/or rear of the bus.

6. I support facilitation of enhanced visitor experiences in lower cost categories to keep Denali accessible to everyone. Self-guided economy tours sound similar to what is provided currently on Shuttle Buses to specific locations, but insuring that independent and low-cost options are available sounds like a desirable service for some visitors. I have always received interpretive information on trips, for example when I have taken a shuttle bus into Toklat where I disembarked for a day hike. I do not believe it is necessary or cost-effective to provide interpretive materials to all visitors or tour participants, but feel these could be made available on-demand or for production cost in the VC and bookstore.

7. I believe that costs should be based on the minimum amount necessary to operate the service being provided.

8. I support exploring different sized buses, including larger buses, to accommodate more visitors during peak visitation. Of course, the impact of larger groups on visitor experience should be considered. It seems like individuals that participate in large group activities (bus tours or cruises) may be less susceptible to impacts from larger groups, so maybe larger buses would be more appropriate for Premium Tours than Shuttles.

9. I do not perceive that visitors need to go deep in the park on a bus to have an exceptional experience in Denali, and thus I do not support increased use west of Eielson to Wonder Lake. I support establishment of Wildlife Viewing Subzone 3 as described in Alt C. Day trips to Wonder Lake/Kantishna should be limited and services should be offered that encourage overnight stays. Six hours on a bus, plus rest stops, interpretive stops, wildlife stops and a visit to Eielson is a full day and there is little need to encourage more visitors to travel further. Thus, the longer Premium Tours described in Alt B could be focused on the area between Teklanika and Eielson as opposed to Tek and Wonder Lake if this alternative were chosen.

10. I support having tours reach a variety of destinations within the park to disperse use, and support enhancement of destinations to accommodate visitors with toilet/bus pullout facilities.

11. I reiterate that I have always found the shuttle drivers to be friendly and knowledgeable, with many having worked in the park for >20+ yrs. I do not perceive the need for drivers/naturalists to be NPS trained. Initial training, including providing written and video materials, and apprenticeship time with experienced staff seem adequate to provide drivers with the level of information that most visitors are interested in.

12. I do not believe that tickets on Shuttles should be prorated at a fine scale, as this seems like it would cause significant confusion and frustration on behalf of visitors and staff, as well as additional time/paperwork for staff. I doubt that bus drivers would want to be responsible for insuring that individuals got off when they should, and having an on-bus payment system would cause delays. Perhaps two rates, for example, going to Teklanika and going to Eielson or half-day and full-day passes, would be a fair

compromise.

13. I am not familiar with issues surrounding employee and concessionaires in Kantishna access to the park, but I would discourage policies that support use of private vehicles and believe these should be limited. Having employees use shuttles when appropriate seems desirable, and smaller vans or buses can be used to transport groups of employees to locations, such as Eielson. I regularly see empty buses operated by Kantishna entities operating on the road, and wonder if there are ways to provide incentives for discouraging this? Is there a way to incorporate hikers needing transport East onto these vehicles?

14. I support combining professional and commercial filming programs to reduce bureaucracy and equity. Restricting permits to three per day and that no more than 2 photographer parties can be at one location is suggested in Alt C, but under Alt B it is only two and they must be for distinct areas. I do not know enough to have a preference. I do believe that visitors and photographers should have to maintain a certain distance from wildlife, and this should be explicit in permits for photographers.

15. I support the use of the adaptive management framework described in the plan. The NPS is responsible for limiting damage to resources, and having a monitoring program is essential to any management plan, even if the park chooses to keep most aspects of management the same (e.g. Alt A)

Thank you for consideration of my comments.

Correspondence ID: 207 **Project:** 22494 **Document:** 42309
Received: Oct,28,2011 15:22:04
Correspondence Type: Web Form
Correspondence:

I have visited Denali National Park every summer since 1971. I did my Master's thesis study in the Park, spending two summers based in Teklanika Campground and riding the shuttle busses nearly every day. Later, in my capacity as a biologist with the Alaska Department of Fish and Game, I consulted with Park biologists on various wildlife research projects. I was an outside reviewer for Dall sheep studies in the 1990s. I reviewed and advised Park Service on its wolf and caribou research and management programs. I have provided naturalist training to Concessionaire, Park Service, and Camp Denali employees. I have guided private nature excursions to all four Kantishna area lodges. I have held a Professional Photography permit for the past eleven years. I have frequently stayed at Teklanika and other campgrounds and have often ridden the Park transit busses. I have frequently gotten on and off transit busses and have hiked throughout much of the Park from the Nenana River to Wonder Lake. I believe I am well-qualified to comment on the Vehicle Management Proposals.

I strongly support Alternative A-the No Action Alternative. Recent traffic levels on the Denali Park Road have been well below the current limit of 10,512 vehicle trips per season. Also, visitor surveys conducted during the Road Capacity Study did not indicate any major problems. Responses to all questions ranged between "no problem" and "small problem." No "big problems" were identified. Yet the action alternatives B and C go to great lengths to fix minor problems. Many of the proposed changes in Alternatives B and C would require very strict scheduling and adherence to time tables at various waypoints throughout the Park. This is not specifically stated in the planning documents made available to the public, but it is implied by some of the figures presented in the documents and by some vague statements about finding schedules that would achieve desired results. To my knowledge, no specific schedules were made available to the public. Such strict scheduling would likely result in reduced time at wildlife stops and a loss of flexibility for optimizing visitor enjoyment.

The vast majority of all passengers, including transit bus passengers, use the busses as a de facto tour of the Park. Very few, if any, passengers need to be at any specific destination at a certain time. The public would be better served by a system that run all busses as if they were tours with somewhat flexible schedules (and the option for some passengers to get on and off, if they so desire) rather than perpetuating the current fiction that transit busses primarily serve to get people from place to place according to a strict schedule. None of the proposed alternatives would accomplish that, but the No Action Alternative probably comes closest. In my experience, transit busses under the current system are seldom actually on schedule, but then the current system lacks the measurable and presumably enforceable parameters such as "sheep gap spacing," viewshed limits, and limits on numbers of vehicles at a rest or wildlife stop that would mandate strict adherence to schedules.

Other than extending Natural History tours to Teklanika Rest Stop instead of Primrose Ridge, the tour options in alternatives B and C are hardly any different from the options available under the current system. Trying to combine various levels of interpretation and pricing on a single bus would be unworkable.

Under no circumstances should any of the following be adopted:

Sheep gap spacing-I did my Master's Thesis study on Dall sheep in Denali Park. I was also a reviewer of the sheep studies conducted by Park biologists Jeff Keay and Judy Putera in the 1990s. Scheduled gaps in traffic to facilitate road crossings by sheep are based on the assumption that road traffic inhibits crossings between seasonal ranges.

Data are inconclusive on this point. Recent findings during the Road Capacity Study indicated that sheep sightings along the road were more common during the early, low traffic, part of the summer and decreased later as traffic levels increased. It was pointed out that reduced sightings later in the season could also have been due to natural shifts in habitat use to higher elevation areas away from the road. The habitat shifting definitely occurs-that was the basic finding of my thesis research. There were also a total of three observations during the 1990s that suggested sheep cross the road more quickly (i.e., in about 10 minutes) when no vehicles were present. However, documents available to the public in conjunction with the Road Capacity proposals failed to mention that road crossings by GPS-collared sheep occurred primarily during midday and at higher traffic levels. Thus, relationship between vehicle traffic and sheep sightings seems spurious. In short, data do not support the assumption that road traffic actually has an adverse effect of sheep or that 10 minute gaps in traffic every hour will facilitate sheep crossings.

Viewshed limits-Why is this even a consideration? Implementing such limits would require very strict scheduling and/or some way for busses and other vehicles coming from two different directions to communicate and decide which vehicles can proceed through the area. What if there's a wildlife viewing opportunity in the viewshed? Would some busses need to leave the wildlife sighting so some other bus wouldn't have its viewshed spoiled? How would private vehicles or maintenance vehicles comply with the limits?

Vehicle limits at wildlife stops-Having too many vehicles at a wildlife stop was not identified as a "big problem" by visitors. The proposed limit of three vehicles was seldom exceeded. Which would be more preferable to the public-having to share a sighting with several other vehicles or having to wait somewhere out of sight until other vehicles move on. Spending more time watching the wildlife or having to move on prematurely so that another bus can take your place?

Night time road limits-Not supported by data. Increased wildlife sightings after "quiet nights" weren't even close to statistically significant. Proposed limits seldom approached under current conditions.

Limitations on private vehicle travel to Teklanika Campground-Other than its gravel surface, the road from Savage River to Teklanika Campground is not fundamentally any narrower or more difficult to drive than the paved road to Savage. I see no reason to limit private vehicle traffic to the campground. Teklanika is highly popular with resident Alaskans and with other travelers with self-contained RVs, campers, or passenger vehicles who don't want to lug all their gear on a Camper Bus. The campground has occasionally been closed to tent camping because of wildlife conflicts. Converting this campground to tents-only would be a huge mistake.

Hiker time for reboarding busses--Hiker wait time is supposed to be a surrogate for walk-in seat availability at the Park entrance. However, busses often fill 2 days in advance at the Park entrance. Getting a bus seat at the Park entrance during peak season without advance reservations is a particularly difficult problem and there may be no easy solution, but it is a totally separate problem from being able to get back on a bus further out in the Park. Hiker wait time is a problem because the shuttle busses in reality are de facto tour busses. During peak season busses leave the Park entrance with a few empty seats, but those seats fill up at Teklanika Campground. Nearly all passengers stay on the same bus when it returns from Eielson, or some remain at Eielson but their seats are reallocated to other passengers by the Eielson dispatcher. Either way, there are sometimes not enough empty seats to accommodate hikers who want to reboard a bus somewhere else along the road. The solution to hiker wait time during peak season is to add a small amount of capacity to the transit system and spread that capacity throughout the day and throughout the Park by having busses leave the Park entrance with more empty seats and maintaining some empty seats when departing Teklanika westbound and departing Eielson eastbound. In shoulder seasons, when morning busses tend to be full but later busses have many empty seats, the solution is to allocate more empty seats on the early busses and spread riders more evenly throughout the day-no need for additional capacity, just use existing capacity more efficiently. That could be accomplished under the present system.

Combining Film Permits and Professional Photography permits-Conditions for commercial film permits are very different from the conditions for Professional Photography permits. Film permits (there are similar requirements for other Parks) are designed for commercial shoots using models and props and/or large crews and for special productions (usually on contract) that may require extended shooting periods. Professional Photography permits accommodate professional wildlife and nature photographers with the understanding that public transit options are incompatible with serious nature photography. Professional Photographers must meet certain qualifications that would not necessarily be appropriate for commercial film photographers. Commercial film permits can require bonding and monitoring that would be unnecessary for Professional Photographers. Professional Photographers can qualify for up to 12 days assigned by lottery several months before the season starts. Film permittees may require more than 12 days or days at specific times that might not be available by lottery. The two programs serve different purposes and simply don't mix. Recently Park Service has issued Film Permits to some individuals who should actually be in the Professional Photography program. That's an administrative blunder, not an excuse for merging the two distinct programs.

Changes in the Professional Photography Program-All alternatives would continue the Professional Photography program at some level, so the basic justification for the program doesn't seem to be in question. There is no compelling reason given for the reductions in number of permits or shortening of season dates in Alternatives B and C. Splitting permit allocations between the Savage to Toklat and Toklat to Wonder Lake areas would be completely unworkable. I brought this up at a public planning meeting

in Fairbanks before the final Alternative proposals were developed and specifically asked where a photographer with a Toklat to Wonder Lake permit could spend the night. Superintendent Anderson responded that they could camp at Wonder Lake. I pointed out that Wonder Lake is a tent-only, no vehicle campground. No Park representatives at the meeting seemed to be aware of this. Superintendent Anderson then said photographers could camp at Teklanika, but he couldn't say what they would be allowed to do along the road between Teklanika and Toklat. In spite of my bringing this issue to their attention, that option still occurs in alternative B, with no explanation of how it could be implemented. The Professional Photography should be left as it is.

Again, I strongly support Alternative A, the No Action Alternative

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Correspondence ID: 208 **Project:** 22494 **Document:** 42309
Received: Oct,29,2011 11:22:31
Correspondence Type: Web Form
Correspondence: I am for alternative A No action. It seems to me that Park Service is a little too much on the presumptuous side in this matter. For one,the EIS is way too complex for most people to even understand. Two, we are talking about a delicate ecosystem that will be compromised from increased access. Three, in this day in age with the economic situation that may or may not recover in a timely matter, are the other two alternatives really the best action to take?

Correspondence ID: 209 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,29,2011 20:23:56
Correspondence Type: Web Form
Correspondence: I strongly favor Alternative A, the no-action alternative.

Where is the problem? Responses to visitor surveys varied from NO PROBLEM to SMALL PROBLEM -- no major problems were identified.

Alternatives B and C would require greatly increased coordination and monitoring of traffic, likely with greatly increased cost to NPS. Where will funding for this come from? Most federal agencies are anticipating significant funding cuts, not increases.

I first visited Denali in 1969 and have been back most every year since. As you are well aware the experience has changed dramatically. I see no reason to institute additional restrictions to further diminish the wilderness experience. Attempting to adhere to the proposed viewshed limits, sheep gap spacings, and vehicle limits at wildlife stops will create havoc in an already stressed system. You have not provided any idea on how these new limits will be enforced -- I cannot imagine any practical way of applying the proposed new limits.

If there isn't a problem with the current system, why create problems.

I support Alternative A, and strongly oppose Alternatives B and C.

Correspondence ID: 210 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,29,2011 20:44:30
Correspondence Type: Web Form
Correspondence: Alternative A. No action. Was first there in 1975. It was better then, way less town at park entrance. Normally I am not a tree hugger but have to make an exception in this case.

Correspondence ID: 211 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please....the only option I can support is Alternative A - no action.

I am a long time resident of Alaska and a long time lover of Denali National Park. I camp in Teklanika in a very small slide in camper and use the bus system to move around the park and day hike.

Your other options are so strongly in favor of out of state tourists and the young and able that it seems purposeful to cut out us "locals". This is simply an access issue - for

us that have aged in place in Alaska yet still active but choose to no longer tent it, for people with disabilities and for senior citizens who cant tent.

I implore you to support Alternative A - no action.

Thank you for reading this and I appreciate your consideration.

Correspondence ID: 212 **Project:** 22494 **Document:** 42309
Received: Oct,30,2011 13:19:05
Correspondence Type: Web Form
Correspondence: IN REGARDS TO THE DENALI VEHICLE MANAGEMENT PLAN I AM IN FAVOR OF ALTERNATIVE A: NO ACTION.

Arguments against Alternatives B and C:

? they are overly complex.

? they are costly to implement and costly to maintain on a long-term basis.

? road capacity determination using adaptive management strategies would not be fully immune to commercial and political pressures for increased access.

Any Denali vehicle management plan should ensure that:

? the transit system remains accessible and affordable to the general public

? transit service operations have priority over tour service operations

? NPS adopts the Wildlife Viewing Subzone 3 described in Alternative C implementing more restrictive standards for the park road between Eielson and Wonder Lake.

? the Eielson to Wonder Lake Wildlife Viewing Subzone 3 is adjusted to extend to the old Park boundary rather than stopping at the Wonder Lake campground road.

? Kantishna day tour business be regulated using Commercial Use Authorizations and these day tour operations be restricted to a maximum of 4 per day for all Kantishna lodges combined.

Thank you for the opportunity to comment on these alternatives.

Correspondence ID: 213 **Project:** 22494 **Document:** 42309
Received: Oct,30,2011 16:58:38
Correspondence Type: Web Form
Correspondence: Hey: Try as I might, I cannot find the time and energy to pick through the the details of the vast document under review. Sorry, but ever hear of "omit needless words"?

So, just a few comments:

No planner wants to accept hard limits, any more than the Central Banks, but it's really the best thing for each. Please keep the 10512, even if it was an arbitrarily chosen number. Once it's gone, there's nothing but the abyss...

Everyone who's ever spent much time on the Park buses has realized that the happiest, most efficient bus is the most homogeneous. The planning elements which would

push loads toward the heterogeneous are bad ideas, and should be abandoned.

The shuttle or VTS or Transit or whatever system should be the hub and soul of transportation in the Park. The current system of deliberately scheduling too few VTS buses is hard on everyone. Just-in-time can be extremely efficient in some situations, but, in the Park, is better called Way-too-late! Having to scramble to come up with another bus and driver at a moments notice is hard on Dispatch, Drivers, and ultimately, Passengers. The wait time at Eielson should be more closely monitored, as well.

Otherwise, the DCC has performed a reasonable analysis, and I largely echo their input, though I don't believe they go far enough. Of the existing alternatives, I can only support the NO ACTION. The present system has been shaped by many years of hard knocks, by many failed/successful experiments, and mostly works amazingly well. The worst problem this year was the huge pack of AM Tours, which jammed up the road from beginning to end.

Correspondence ID: 214 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,30,2011 20:41:13
Correspondence Type: Web Form
Correspondence: October 30, 2011

Dear Supt. Anderson,

Thank you for allowing comments on the proposed Vehicle Management Plan.

I am a past employee of the National Park Service and worked over 16 seasons near or inside Denali National Park, 6 of those years spent living and working at Toklat Road Camp. The road itself and the management of the road is important to me.

My history, which I believe is relevant to comments: When I arrived in 1991, the shuttle system was free for anyone to ride. A visitor would pay the entrance fee and then was free to ride whatever bus he/she wanted to. It was a good system that worked for backpackers, day hikers and those on package tours. In those days, the tours were operated by a concession different than the system that operated the shuttle buses. From the perspective of someone who rode the bus on a weekly basis (if not more), the system worked really well. When the contract was let to Aramark to run both the systems, the shuttle operation faltered and in my opinion, started to fail. The drivers were still great and the buses didn't change, but it was clear that the backpackers and those with a small pocket book didn't matter to the park. I heard some really odd tales about what visitors were told when they tried to call and reserve bus tickets. I decided to do my own research. In fact, I found that the call center would tell visitors that the shuttle buses weren't as comfortable as a tour bus and "you might not see as much wildlife", telling people that if they wanted to see wildlife, they should take a Wildlife Tour. I kept schedules from the early days and over the years recognized that less and less buses were put on the road for shuttle buses and those buses were allocated to tour buses. It was harder to get in the park on a shuttle bus and not only that, I believe the current fees have exceeded what an average American can pay. Approximately 10% of Alaskans are 100% below the poverty level...how does the system accomodate those 70,000 individuals plus all those from the lower 48? It is now cost prohibitive for a family of four in middle America to visit Denali and go camping or even just get in the park and go for a ride to Wonder Lake. For 2 people it costs more than $100 total to camp for a night at Wonder Lake.

There are pieces and parts of the different alternatives that I agree with, but there is no plan that I can agree with overall.

The best alternative in this plan as I see it is to follow the no alternative plan and use management decisions to make the changes necessary. Most of the changes in the current system were made with no EIS. Or ignoring old EIS's.

Concerns - First, its pretty clear NPS has not followed the current allocation. In the 1997 Road Corridor EIS, it is stated that a new allocation of buses will be an annual decision for flexibility...but the 10,512 number would still remain. In that plan, however, NPS lists the yearly allocation/limits as 2,089 buses for tundra wildlife tour and 3,394 for the shuttle operation. Looking at passengers numbers over the years since then, the numbers just don't add up. For instance, in 1999, there were 107,930 passengers on TWTs. If there are indeed 50 passengers on each bus then that means a total of 2,158 buses that season for TWT. That shouldn't be, if the limit is 2,089. And in 2001 there were 118,522 passengers on TWT's which would mean at 50 passengers per bus, there were 2,370 buses. These numbers work only if each bus is completely full. If there are a few less riders on some of the buses then the bus numbers on the road are even higher. (ie if you take an average of 48 riders per bus instead of 50 for 2001, then you get 2,469 buses - 380 TWTs OVER the allocated amount) Ridership on TWT's has grown since that time. I list these numbers as just one reason to not trust the NPS allocation method, no matter what it might be. At least if it stays at a precise number, the public can tell whether the limits have been reached. Both alternatives B&C do not give any clear way to determine allocation. The table from NPS records is attached for your perusal. If the park service is saying that the road is overcrowded, perhaps its

because the limits are past capacity.

There should already be "self guided" tours....if the park wants this to happen, they don't need an EIS to do it. Every visitor should have the option of bringing along their own educational materials. However, if the park service is going to have some kind of pre-taped audio tour, it should most likely go thru some kind of vetting process.

I would like to see an independent system selling the bus tickets and see what would happen. Having the concession selling their own tours and having the opportunity to tell people that the wildlife tour is a much better option is, well, unforgiveable. Number 1 - the shuttle system should come at a much lower cost to the average American. Number 2 - a clear way of allocations is not clear in Alternate B & C. Is the park service really going to measure "appropriate tour experience"? What is a "modest tour experience"? NPS says they will provide transparency, but there is no clear system represented to say how that will actually occur.

With either of the new systems, what would the schedule be to make sure that backpackers wait no longer than 30 minutes, that visitors see no more than 3 buses at a stop and that everyone that wants to come into the park gets to do so? I see indicators, but no way implementation plan. How will the NPS change the schedules, AND WHEN, when the indicators clearly show that people are not receiving the service laid out in the plan. i.e. a backpacker waits 2 hours for a bus and finally gets one, and on that ride sees 5 buses piled up at a bear sighting. This happens 4 times during one summer. Does the plan change the next summer? Does it change after the 4th time it happens to the same person? Will changes be made mid-summer or does the general public really have to wait 5 years before the plan is implemented? The plan should clearly lay out when changes will be made and how, not "for instances" and "maybe this way".

Transit Economy tickets - Nice that NPS is thinking of lowering costs, but taking away the camper bus is a bad idea. Paying more money so one can keep the same seat throughout the "tour"? Its a shuttle service not an airline. And, since it is a shuttle service, the focus should be on affordability for a family of 4, not on making money.

Adaptive Management Research plan? NPS says they want to be clear and transparent but this is murky and confusing.

Mandate that visitors go to a NPS Visitor Center? While I think its a good idea, perhaps not every visitor wants that mandate. It should be an option and drivers need to make sure to present that option and show tourists the frontcountry visitor center, but to MAKE visitors go see the center when it might not be their wish seems pushy.

Under alternative C - the disastrous Puddle Shuttle from the 80s and 90s...no, no, no. The drivers learned quickly that the puddle shuttle didn't work. It was a nice try and interesting experiment, but everyone involved with the trial knows it had ill effects, both on Eielson and on drivers.

A fear is that NPS would actually implement a tour to go to Eielson. The TWT is long enough (time wise) and if surveys are studied, is there anywhere that visitors say "I wish the TWT was an hour longer"? NPS must adhere to DOT driver policies and laws in regards to drivers road time. Its ARAmarks responsibility to make sure drivers follow law, but NPS should also be aware of these laws when passing rulings that directly affect drive time in the park.

While I like the idea that there be more space for backpackers, making room for them on a tour bus is most likely a poor choice. I know at the end of a 3 or 4 day backpack (or longer), I don't really want to talk to anyone, I'd rather sleep than talk to 50 people who can't understand how anyone would want to wander off for 4 days in "bear country" without a gun.

Possibilities - Keep the current system, no action alternative, and create a committee similar to the Overflights Advisory Committee. It would be a committee of 12 individuals from various walks of Denali: backpacker, local resident, shuttle bus driver, tour bus driver, Kantishna resident, Kantisha hotel, frontcountry shuttle driver, Aramark representative, Princess representative, subsistence person, maybe DCC and then ATIA reps. They could face the issues like the flights committee has waded through the past 3 years. It could be standing and on-going to examine and change the systems when/if needed. Hopefully that would be a lot cheaper than million or so dollars for either alternative B or C.

Affordability should be key in the plan. Make the park available to all Americans, not just those with alot of money.

The 1997 corridor plan gives a 15-20 year limit. Revisit this plan in 2015 or 2017.

Thanks for your attention to everyone's comments. I look forward to the end result of this long process and the decision on the future of the park road.

Correspondence ID: 215 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,30,2011 22:00:55
Correspondence Type: Web Form
Correspondence: I submitted detailed comments previously, in which I strongly supported Alternative A. I would at this time like to add an additional comment.

Page 45 of the draft plan states: "The maximum annual and daily vehicle capacity for the Park Road will be published each year as part of the Superintendent's Compendium, subject to public notice and comment. This will allow the superintendent to set the next year's capacity based on monitoring, research, and lessons learned in the prior years' implementation. The National Park Service would initiate the necessary steps to promulgate a modification of CFR 13.932 - 13.934 that would give the superintendent discretion to set the maximum capacity of the road to maintain the vehicle management system indicators and standards."

I sure don't like the idea of leaving vehicle capacity up to the discretion of the superintendent - what is he decides to let even more vehicles invade the park? And with park funding in jeopardy, who knows whether the NPS will even be able to do all the necessary monitoring to asses the impacts of traffic on wildlife etc. I strongly urge the NPS to retain the current 10,512 cap on vehicle numbers and not even think about adjusting it upward until detailed studies can show without a shadow of a doubt that current vehicle traffic levels are not negatively impacting wildlife. And even if that can be demonstrated reliably, the process of allowing increased numbers of vehicles should not be left to the discretion of the superintendent. Pressure from Aramack and Cruise ships and other who stand to make money from increased road traffic must not be succumbed to at the expense of the wildlife and the intergrity of the Park.

Correspondence ID: 216 **Project:** 22494 **Document:** 42309
Received: Oct,30,2011 22:26:47
Correspondence Type: Web Form
Correspondence: My fascination with Denali National Park began years ago when I first visited Tom Mangleson's "Images of Nature" gallery. Images of caribou and moose with Mt McKinley and the crimson tundra lit a fire in me. I knew then I would visit Denali National Park someday. What a thrill it was a few years ago to obtain my first professional photo permit and to shoot alongside Tom Mangelson. In my own way I've continued to create interest and draw people to this wonderful part of the world.

I respect and agree with efforts to protect the Denali ecosystem and to preserve the quality of the experience for future visitors. My desire to protect and preserve Denali first began when I saw images taken in Denali by a professional photographer. I strongly support a solution that will maintain the Professional Photography program and tradition. If it contributes to a viable solution, I would support a compromise that reduces the Professional Photography permits during the busiest tourist season. I am strongly opposed to eliminating the Professional Photography Permit progam. I know from personal experience that high quality professional photographs depicting the beauty and grandeur of Denali, have the power to inspire people to protect that beauty.

Correspondence ID: 217 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,30,2011 23:02:08
Correspondence Type: Web Form
Correspondence: i strongly reject both action alternatives. they are both too vulnerable to manipulation and political pressures, too flexible and expensive, and too academic and confusing to be easily understood and followed over time. the general public has viewed the current system favorably and NPS has not demonstrated a need to radically change the current system and lock in a new system for such a long period of time. DCC suggests using a dismissed alternative that would have utilized adaptive management within the current regulatory limit that could save time and expense and be used to develop a defensible limit for vehicles on the park road. i strongly support an identified defensible numerical limit for vehicles on the park road. as i read the DCC publication for sept-october 2011 their ideas and suggestions are clearly a better approach to a transportation system that is based on a identified numerical limit, that places affordability and transit at the top of the guiding list of priorities, that preserves the wilderness quality of the park, and provides for future generations to enjoy the park.

Correspondence ID: 218 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,30,2011 23:54:45
Correspondence Type: Web Form
Correspondence: Denali Vehicle Management Plan comments October 30, 2011

I support Alternative A, the no action alternative, because B and C would be contrary to how I think the DNP road traffic should be managed.

Protection of the natural resources and environment of Denali National Park should be the number one management priority. This means, among other things, that fish and

wildlife populations and habitats as well as plants must be protected in their natural population densities and dynamics. This also means that visitor access pressures must be subordinated to protection of the park's natural resources. Protection comes first, even if the number of visitors must be limited. Only in this way can the quality of the visitor experience be maintained.

This brings me to my next point, which is that the time spent at wildlife viewing stops should be flexible, driven by the needs and wishes of the group rather than by an arbitrary NPS time limit. If a good wildlife viewing opportunity arises, I do not want to be hustled along and I don't think others do either. I want to be able enjoy, appreciate, and possibly photograph the wildlife and surrounding country. These wildlife viewing opportunities and other vistas are for most the experience of a lifetime; which will be remembered for years and years. It should be savored; not cut short. My experience with the current system is that when buses start to pile-up at a good wildlife viewing stop, the drivers move on appropriately. It is an informal, common sense system that works.

And finally, I do not want to see diminishment of the shuttle bus system in favor of large commercial interests. DNP is not here to kowtow to industrial tourism. Of course, the tour buses have a place, but they should not supplant the independent traveler?. which includes Alaskans. This Plan should provide guidance that enables NPS to say to the tour companies: "no more buses." And the plan should stipulate specific limits on the number of buses as well as the balance between the shuttle system and industrial tourism. The shuttle bus capacity, relative to the tour company bus traffic, should not be diminished from what it is today. And no "mega-buses"? buses should remain the same size or be smaller.

Thank you for this opportunity to comment.

Correspondence ID: 219 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 01:23:13
Correspondence Type: Web Form
Correspondence: PLEASE preserve the unique wilderness quality of Denali National Park and choose ALTERNATIVE A which would NOT increase the number of buses on the park road. I have been a resident of Alaska for 31 years and have stayed in Teklanika Campground for 7 to 10 days each summer for at least 25 of those years. It was startling to see the increase in bus traffic in the early 1990's when tour buses were allowed; The experience of the park changed, and NOT for the Better! The eventual "phase out" of the few private vehicles which are allowed to drive into Teklanika Camp, in favor of profits for the Tour Industry, is just WRONG. The ability to take a vehicle into Tek Camp is a matter of accessibility for the disabled and the elderly who wish to have more than a 'superficial' experience of the park. PLEASE DO NOT CAVE TO THE LOBBIES OF INDUSTRY AND GREED. NO MORE COMMERCIAL BUSES IN THE PARK. There are already too Many!

Correspondence ID: 220 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 02:04:40
Correspondence Type: Web Form
Correspondence: Dear National Park Service; My initial reaction to the National Park Service Vehicle Management Plan is why are you proposing changes to a transportation system that has worked well for many years and has sufficiently evolved based on the needs of "all visitors" to the park. I have found the plan to be biased towards the "Tour Company Operators" and less friendly to the "Alaskan" visitor. Alternative A is the only sensible alternative that serves all the park visitors. I have visited Denali National Park since 1972 and have seen many changes to the Park. The most significant change has been to the transportation system along the Park road. The increased amount of bus traffic has visibly changed the Park experience. The Park does not need more buses that are fully loaded on the road. I have spent many days using the current Visitor Transportation System to access wilderness hiking along the Park road system and have found the current system to be very adequate. Major changes to the transportation system will impact the sensitive nature of Denali's unique ecosystem. Therefor Alternative A (no action) will have the least impact on the Park. Please remember that small amounts are attainable, large amounts are confusing, subtly arrange the outcome, nothing more, do not use force. Thank you for considering my comments.

Correspondence ID: 221 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 03:07:17
Correspondence Type: Web Form
Correspondence: Dear Superintendent Anderson and Denali Park Planners,

I am writing to express my comments on the draft Vehicle Management Plan and EIS for the Denali Park Road. I live in the local area, and for the last 9 years I have ridden the current Visitor Transportation System (VTS) into Denali National Park for both work and pleasure. The majority of the time, I take the VTS system to access the backcountry of Denali National Park with my friends and family and usually ride the buses about once a month between June and September each year.

From my experiences on the shuttle system and from the 2006 Visitor Use Survey, it seems the majority of riders are happy with the current management system for the

road and level of road traffic. I do not want to see an increase in traffic on the road ? but I want to see the park maximize the amount of visitors who can access the park while keeping traffic similar to current level on the road.

As you are aware, the current motor vehicle limit past the Savage River (10,512) is not accurate - it ignores traffic to Primrose (DNHT Tour) and the contractor traffic. I am glad to see that the new management plan will count those numbers as they should be managed like the rest of the vehicles going past Savage River.

I am in favor of a combination of Alternative A and B, but with some major objections to Alternative B as it is currently written.

1) I am worried about the complicated adaptive management policy to determine the allocation of park traffic each year. The country is going toward a trend of shrinking federal budgets so needing millions of dollars more to implement and manage this new system will either come at the expense of other park programs or not be able to be fully implemented. I would rather see us start with the current allocation (10512 + DNHT tours) and then look at how it measures up to our indicators over the next 5-7 years. To re-visit the allocation numbers every year is confusing and would end up being very expensive. Since visitors seem satisfied with the current system ? isn't that a good place to start?

2) Currently the DNHT Tour goes to Mile 17 but in alternative B, the tour goes another 10 mile to the Teklanika Rest Stop. I strongly feel the Primrose (Mile 17) tour should remain the "short tour" option and have the DNHT tours continue to use the facilities that were already constructed for them (Primrose Rest Stop, Savage Cabin Rest Stop). The Teklanika Rest Stop (and the gravel road to it) was not constructed with the extra buses in mind and to extend DNHT tours out there would require building more facilities (structures, parking lots, restrooms, trails) that would not only cost more to build and maintain, but change the character of the Teklanika area into an extention of the "frontcountry " area. I would not be surprised to eventually see the road paved to Mile 29 under this plan and I think this would be a great mistake. One of the things that make Denali unique is how undeveloped it is past the Savage River, and visitors feel this change once they hit the gravel road at Mile 15. To widen the road and build more man-made structures along the way would take away the wilderness experience many visitors come to Denali.

3) Keep the greatest amount of flexibility and affordability for the visitors by keeping the transit/economy tour simple and similar to how it currently works in 2011. The park needs to stay affordable for visitors ? both those who decide to stay on the bus and those who wish to get off it. The conflicts I see on the current VTS buses are not "tour" vs. "transit" ? it is talkers vs. non-talkers. There are people who want to listen to the driver and those who want to talk to everyone else. Perhaps there could be a headset for folks who want to listen to the bus driver and/or pre-recorded interpretive narration. I feel you should not pay more for the economy tour seat vs. transit seat. Costs should be based on destination rather than having people pay different amounts for the same experience. The NPS (through its bus concessionaire) should be encouraging people to step off the bus and experience the park or spend an extra hour at a visitor center. If people pay more for a seat, they might feel like they are required to stay in it. As a frequent transit bus user in the park, I would like to see at least 8 seats on every bus left empty to pick up those who choose to leave the bus.

4) The Camper Buses should remain as they are for the following reasons: These buses allow for the wide variety of gear campers use ? from overstuffed backpacks to multiple coolers to inflatable rafts and kayaks. Often there are parties that need to move each night to a different campground or backcountry unit and the Camper Buses give larger hiking/camping parties a good bus to aim for when they need to travel either east or west in the park. Also, in my experience, Camper Bus drivers are very knowledgeable about backcountry travel in the park and most offer good, last minute, safety advice to campers. If the Camper buses were eliminated ? there would need to be a system where each visitor who is camping gets a spare seat on their bus for gear. For example, a family of 4 would get an extra 4 seats to pile their equipment into. This should not cost extra, since it is a required service for accessing the backcountry and campgrounds in the park.

5) I would like to see the bus concessionaire create and promote specials for locals/Alaskans on the transit system. The current company, Joint Venture, allows locals (or anyone who knows about it) to buy a punch card for 6 bus rides that averages to around $10 a ride. These deals should be advertized to all and I would argue for a punch card for 3 or 4 rides a summer for a similar rate ($10) and no limits to when they use it. The park should want locals/Alaskans to experience their National Parks, not discourage them with increasing costs each year.

6) To institute a west end NPS employee shuttle system would be expensive, a nightmare to schedule, and a decrease in west end productivity. The west end workers have a variety of shifts and schedules and must bring out groceries and supplies for often a month at a time. Reasonable alternatives to the shuttle are to: limit their commuter traffic to certain times of day, eliminate the "guest pass", and/or reward those employees who take a VTS bus with a paid commute.

In summary, I would like to express my support for a future park vehicle management plan that would be a mixture of Alternative A and B. I think we need to keep the number of vehicles at a similar level, but to maximize the access for visitors to the park while using the current vehicle number limit until the science (and budget) is there to

revisit the numbers. I am strongly opposed to some changes in the Alternative B plan and they were singled out above.

Thank you for giving the public an extra month to comment on this plan and I look forward to seeing your final assessment.

Correspondence ID: 222 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 09:05:44
Correspondence Type: Web Form
Correspondence: I am writing over my concerns about the vehicle management plan now being considered by the National Park Service at Denali. The only thing that makes any sense to me is the "no action" alternative. This system has developed through a 35 year evolution slowly adapting to the needs of the Park visitor and now being considered for major changes that a few feel will better suit the Park's needs. The other options are vague, have no measures to show improvement of the system for the visitor. The Park Service needs to keep a solid number for vehicles on the road and the 10,512 number needs to stay in place. No VTS (shuttle bus in the transportation system) should be turned over to "tours" of any kind. DNHT's should not go past their current mile post on the Park road. The planned for money for a monitoring system is uncalled for. In these times of funding cut backs adding more cost to the system is ridiculous. Those cost at some time will be passed on to the Park visitor making their Park more costly to visit. This is unacceptable. The cost added to the transportation system alone is a strong reason for a "NO ACTION" alternative. No matter which plan is chosen we need a solid number of Park road vihicles. We want 10,512 and there is no good reason put forth not to keep that number in place as we haven't even reached that number as of yet.

Correspondence ID: 223 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 15:46:57
Correspondence Type: Web Form
Correspondence: I am a frequent visitor to the park--two or three times a year--and have been since the late 1960's. Obviously I have seen a lot of changes and I love the bus system and never feel it is overcrowded even today. However, if you are looking at a change, I think the idea of developing specialization trips which would divide riders on the buses is a good idea--maybe longer (time not distance) trips that could focus on birding, artifacts, animal migration routes, the rivers, wildflowers, even mining history, would be interesting and would redistribute visitors and make more seats available on the current buses. I do not like the idea of bigger or just more buses. I am not convinced that anything really needs to be done but I would rather give you a proactive answer than simply "leave it alone." I love the fact that people have accepted the bus system--finally--and I think with the upgrade in buildings and on line registration, things run very smoothly. Keep up the good work!

Correspondence ID: 224 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 15:54:58
Correspondence Type: Web Form
Correspondence: I think the number of private vehicles allowed in the park should increase as well as the number of photography permits allowed on a daily basis. The restrictive nature of the shuttle system and the park administration in DenaliN.P. is a national disgrace. The whole system is now against the public in general. The arch in Yellowstone N.P. states "For the Benifit and Enjoyment of the People" What a joke.....

Correspondence ID: 225 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 15:59:14
Correspondence Type: Web Form
Correspondence: I want to strongly encourage Denali National Park to retain the current permit/lottery system for professional photographers. The cruise and tour industry holds the vast majority of road permits while relatively few are offered to photographers. Yet the images provided by these photographers are the photos that provide inspiration for thousands of visitors to travel to Denali. Without the permitting system as it stands, many of those images would never have been made. It saddens me that future images may never be created to make way for a few more buses of cruise passengers.

Correspondence ID: 226 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 16:26:07
Correspondence Type: Web Form
Correspondence: Vehicle Management Plan comments I have worked in this park for 8 years, starting as a Ranger on the east side and now as a Ranger on the west side. I have worked for every division in the park and feel like I have a good understanding how park operations work both for employees and visitors. As long as there are some closer checks and balances involved with why people get road permits, I do not think that Alternative A is a bad option. I patrol the road all summer and do not see an abundance of personal or administrative vehicles during peak hours. For the most part, the public and cruise ship clients can both access the park for numerous ways to recreate effectively with the current action.

Comments for Alternative B: If the park is advertising that they are supportive of public access, they should not allow all bus seats to be pre-booked. This park does not

allow visitors to reserve backcountry units and many people are not sure what they should do until they arrive so the pre-booking would mostly only cater to Princess and Holland America clients. A percentage of seats could be pre-booked so the buses have an estimated number but there should always be stand by seats for the public. This alternative does not give a clear idea of how many seats will be left open but it sounds like there will be few if any. It appears that even though the number of vehicles may be the same or decreased that there would be more buses on the road form Eielson to Wonder Lake. The road from mile 80-84 is the most dangerous part of the park road with the highest number of accidents. It is also the stretch of road in the worst condition. If we add more buses for that duration of the road corridor, there will be a decrease in safety. It also sounds like there would be fewer options for people to explore the park. Would the long premium tour make visitors go all the way to Wonder Lake? That would mean there was no opportunity for visitors to have an interpretive tour just to Eielson (which is still an 8 hour day)? Many issues will arise including angry visitors if a camper bus is no longer offered. Carrying gear externally is a terrible idea. It will take more time and effort to get things strapped to the outside of a bus safely and unstrap as people get dropped off in various places along the park road. The weather is usually very unpredictable and nobody is going to want their belongings covered in calcium chloride saturated dust or mud. There would need to be a way that if it was externally stored that it would be waterproof. As far as food coolers go, externally storing those items is not bear-proof and nobody wants dust in their food. It doesn't matter how well packed gear or food is; dust will find a way inside. With bears becoming more and more comfortable with buses it would also be inappropriate to store food outside with the chance that wildlife could indulge. Without a camper bus, there would also be less transportation for visitors who have actually decided to get out of a vehicle to explore the park and return back to the frontcountry. A sweeper bus is very important so people can have all kinds of access to the park. If a park does not respect its employees then employees will not return and the park will have a huge turnover rate giving a lower quality of service to the public. I think it is very important to respect all of the employees in the park including how they get to their duty stations. Limiting employees to a shuttle system will not work! There are too many people on too many different schedules and the lifestyle is very different out at Toklat and Wonder Lake compared to living on the east side. When west end employees go out for a food run, we buy in bulk so we don't have to go out all the time. We need the space to drive all of our belongings and supplies out in as few trips as possible. With a shuttle system people will be left behind or there will not be enough space for everyone and their items. Carrying 2 months of groceries on a bus would be ridiculous and if there are no camper buses, there would not be a bus we could even use! It is also against OSHA regulations to leave food out of a refrigerated area for longer than 4 hours so taking a bus back to Wonder Lake with groceries would be inappropriate. The employees out west do not abuse the road permit system. Most of us carpool to save gas and permits on a regular basis already and most of us drive during (what we think of as) off-peak hours because we are driving out after work. There are so few permits given to the employees out west compared to the rest of the 10512. Shouldn't there be more restrictions on administrative traffic on the road? Resources should be forced to carpool and plan their field days when others are going out. If people can ride the bus out for administrative use, they should and that includes EVERYONE from the media intern to the superintendent. Putting professional photographers on buses is a terrible idea as well. There is already so much tension between visitors and photographers that take the bus because they were not granted a special permit. People complain about professional photographers and their special rules. They also have so much gear that it would ruin other visitors' experiences if they had to avoid a huge camera and tripod as they were seeing their first wild wolf. Commercial authorizations should retain their current day tour numbers. Their request for more numbers is not to access their land; it is to make more money off of the park without paying the park for it. If the reason to phase out private vehicles from Tek campground is to increase the number of buses on the road I am against the idea. If the phase out idea is to enhance visitors' wilderness experiences at Tek then I am fully supportive of it. I would reiterate that if we have another campground that is tents only, a camper bus is imperative to transport people to and from the campground. The park should not need to increase the bus size for wildlife viewing subzone 1. A bigger bus will block the view of other people more easily and the wildlife does not need to be disturbed by larger vehicles than are already out there. The fact that the alternative may increase visual and sound disturbance is not what the park should be supporting. It is a National Park that is preserving wilderness for others to enjoy and more noise means altering a visitor's once in a lifetime wilderness experience.

Comments on Alternative C: The transportation system idea for this alternative is better than alternative B. I agree with still having a transit bus so people can get on and get off anywhere along the park road. Leaving some seats for stand-by is imperative. It is unclear whether these buses would be similar to the camper buses so people could store their gear inside or whether there is still the possibility of storing everything externally (which is a terrible idea). Allowing some premium tours to go to Wonder Lake would be sufficient for the demand but not ALL premium tours need to go to the end of the road. Right now the reason the Kantishna Experience bus is so popular is because an NPS ranger program is part of the tour, not because all of those people want to necessarily see Kantishna. The only reason why the buses will be full is because the premium tour has to go that far into the park. If visitors were given the choice for a premium tour to Eielson Visitor Center many more people would opt for that over going all the way to Kantishna. So it is unnecessary wear on the road and more traffic than is needed on a narrow road. There needs to be more clarification as to what "peak hours" are for employee road permit use. If employees can only drive from 10:00pm to 5:00am, those hours will not work for everyone and their work schedules and it is unsafe during shoulder seasons to expect employees to be driving in the dark the entire park road. If the rule changes that employees cannot allow guests to use their road permits, they will simply use more of their allotted road permits to go out east therefore creating more traffic. If I could give a friend a road permit, they would use the permit to go to Wonder Lake and drive out (2 events on the road) but if I had to go out to pick up my friend and then take them back out that would be 4 road events because I would need to get myself back to my duty station. The other reason for allowing guests on our road permits is to resupply us. If a friend drove groceries out to us and then back to the frontcountry, it is the same number of road trips as if I went out on my own. If employees are allowed to drive during off-peak hours only, why can't their guests do the same? My point is, the employees are not the issue with road permits and their guests' use should not be an issue either. Will other NPS operations be forced to minimize displacement as well? Will administrative traffic be forced to drive during off-peak hours as well? All should be fair whether it is administrative traffic or NPS employees. Professional photographers should not use the transit system. See the comments from Alternative B. For Kantishna in holders, claiming that 1 or more authorizations could be issued is very ambiguous. The lodges are requesting beyond their contractual agreement to have more day tours to their property but the park does

not benefit in any way. They simply create more traffic, more wear on the road, and historically the lodge bus drivers are the least safe of all of the drivers. Only allowing Tek campground campers to access the park during off-peak hours sounds like a fine idea but the peak hours need to be defined better. For example, it is not fair to make people wait until 10:00pm to drive into the park. Size of the buses should not change. It is dangerous to drive an even bigger vehicle through the Wonder Lake area with the narrow roads. See comments from alternative B for possible noise and visual disturbance increase.

Correspondence ID: 227 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 17:09:20
Correspondence Type: Web Form
Correspondence: I support Alternative A, No Action for the Denali Park Road Vehicle Management Plan. I oppose both Alternative B and Alternative C, although I think Alternative C has some good ideas.

Alternative B should be labeled Maximize Access not Optimize Access. It is clearly designed to meet demand, and we all know that meeting demand is not a good goal for a place with wilderness values and wildlife, not to mention quality of visitor experience, to protect.

Under either Alternative B or Alternative C the number of vehicles in the park could be increased, and that is not acceptable. Adaptive Management is an experiment, and it should be attempted under the established limit, evaluated, and then amended if it is determined that more buses would not diminish the park's wilderness and wildlife.

There are too many conditionals where regulations would be better. For example, self-guided tickets could be higher than transit. Buses larger than current could be used. How is the decision made to raise the price or to allow bigger buses? It seems to me that it will be totally up to park management with no public input and susceptible to political pressures. I oppose allowing larger buses on the park road. While adaptive management may be a good idea, it needs to be within established limits. This is especially true as there does not appear to be any analysis of current use and its impacts on park resources. Such analysis might, in fact, show that there is already a need to reduce the current vehicle limit.

I do not see any benefit in creating special self-guided tour buses. Can't a visitor already have a self-guided tour by purchasing a guide book and hopping a transit bus. If not, they should be able to, and the price should not be higher than for other passengers.

Denali Park is not, or at least should not be, a commercial enterprise. Every effort should be made to keep the transit buses affordable. The number of transit buses should not be reduced to allow more tour buses.

In this wonderful country, we have grown accustomed to having what we want when we want it, but, in truth, something that you have to wait for, that you have to plan for can be much more rewarding. As long as the population of the world is growing and transportation is improving, the number of people who want to visit Denali Park in a given year is going to be increasing too. It's a never ending phenomenon, and the sooner it is acknowledged and incorporated into management plans, the better for the Park, the wildlife, and the visitor.

For the above reasons, I support Alternative A, No Action.

Correspondence ID: 228 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 17:37:03
Correspondence Type: Web Form
Correspondence: My comment would be for no change.

The two options are not acceptable as they are both very similar, and both place new restrictions on the amount and type of public access.

There are a number of problems with the existing plan, problems not addressed since it's inception. It is unlikely that these proposed changes will do anything but provide increased funding sources for the commercial vendors holding the transportation contracts.

The planning document does not address a few key problems. For instance the "closure" of the Denali Park Road from the Headquarters west to the Savage Check Station. It is only in recent years that this "closure" has been undertaken. For decades, the Park road was kept open west of headquarters. Some years were more successful than others.

The first Superintendents took to spreading cinders from the boilers to try to keep the road open. More recently, keeping the culverts open by dripping diesel fuel in the uphill culverts was routine practice. The point is, neither the existing management plan, nor the proposed options discuss the status of the Park Road in the winter.

Under Part 13 of 36 CFR the Front Country Developed Area is defined as "all park areas within the portion of the park formerly known as Mt. McKinley National Park (Old Park) not designated as Wilderness by Congress. A map showing the FDA is available at the park visitor center". Under section 980 "The Superintendent may prohibit or otherwise restrict activities in the FDA to protect public health, safety, or park resources. Information on FDA closures and restrictions will be available for inspection at the park visitor center and on the park Web site. Violating FDA closures or restrictions is prohibited". Under section 13.1 facilities are defined as "buildings, structures, park roads as defined by '1.4, parking lots, campgrounds, picnic areas, paved trails, and maintenance support yards." Therefore, the ability for the Superintendent to "close" a "park facility" is for purposes of protecting public health, safety, or to protect park resources. The Park Road is closed at headquarters every year to provide a ski trail and dog mushing opportunities. Does this closure protect public safety? No, the closure only prohibits vehicle access, not foot traffic, skiing, ski joring, snow shoeing or other access. Is it closed for public safety? No, because all other access remains open. Is it closed to protect Park Resources? Apparently not because the road is plowed on one lane to the Pit at mile 7 without regard to the amount of snow. This, taken from the Park's website : "Once significant snow falls, the road is plowed only from the entrance to mile 3, Park Headquarters". So then, it seems that the only reason that the Park Road is "closed" is because it is not plowed. Despite the fact that there are plows available and operational every day, and plow operators available every day. Seems like if the idea was to improve the quality of the visitor's experience to the Park, some effort would be made to keep a portion of the Park Road open in the winter.

Page 12 of Chapter one states "Commercial vehicles are prohibited from operating in the subzone." This is not true. Commercial vehicles are allowed during the "shoulder seasons", when the VTS and other busses are not running as part of the Superintendent's direction. Not only that, but they are allowed to operated without meeting the requirement of a Commercial Use Authorization.

Page 106 of Chapter 3 states that "The Denali Natural History Tour" is not subject to the seasonal allocation limit, since the buses only travel two miles past the Savage check station" This remains unexplained. Why are these buses, which count as many as 23 per day, not counted? Private vehicle are prohibited from traveling these two miles. The VTS buses turn around at the west side of the Savage River without a problem. Why are these vehicles exempt? Under what authority are they exempt? Are they just not counted? It is clear, according to the current requirements found in 36 CFR 13.930 that a vehicle requires a permit to travel on the restricted section of the Park Road : "Yes, you must obtain a permit from the superintendent to operate a motor vehicle on the restricted section of the Denali Park road. The restricted section begins at the west end of the Savage River Bridge (mile 14.8) and continues to the former Mt. McKinley National Park boundary north of Wonder Lake (mile 87.9)." Page 107 of the management plan states "Separate limitations apply to vehicles re-entering the Old Park from Kantishna for day-hiking, which presently are not counted against the road capacity limit" . Why are these re-entries not counted against the current 10,512 vehicle limit? They are clearly entering the restricted section as currently defined. Once a vehicle travels west from the Savage Check Station it is allowed unlimited travel on the restricted section of the Park Road as long as it does not cross the Check Station. It can travel east from Kantishna all the way to the check station and turn around. Travel all the way west to Kantishna and it does not count? Why don't any of the alternatives address this?

The professional photography permit system is a totally arbitrary mechanism for vehicle access to the restricted section of the park road. All the options describe an application criteria. Past history indicates that a letter to the Superintendent is sufficient to establish eligibility. Despite the fact that the NPS has "established guidelines" listed in the program, these guidelines are routinely abused and the photographers are allowed access to the restricted section of the park road if they write a complaint letter when they are denied.

While it is clear that the NPS has a done a good job in managing the resource in the previous years, it is also clear that there is great resistance to "allowing" the public to have access to it's own lands without undue restriction. It is either unwilling or unable to implement the simple requirements currently identified in Part 13, or completely fulfill the requirements identified in ANILCA. Increasing access to the park should be it's primary goal, not increasing the cost in visiting it. Allowing more access should come before increasing the contractor's bottom line.

Thank you for the opportunity to comment.

I still hope that the Park Service will not feel forced to chose any option other than Alternative A: NO ACTION.

Correspondence ID: 229 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 18:00:45
Correspondence Type: Web Form

Correspondence: Of the three alternatives presented, I support Alternative A (no action). It is unclear how Alternatives B and C would have "vehicle use on the park road adaptively managed" when most seats would be pre-booked far in advance, thus precluding changes in schedule that would be required for adaptation to the animal's needs. I believe that Alternative A, but with the added study and adaptation presented at present only in Alternatives B and C, makes the most sense.

Thank you.

Correspondence ID: 230 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 18:02:37
Correspondence Type: Web Form
Correspondence: I think this is a panic initiative, based on what is happening financially world wide. A resident of Alaska from birth in 1948 until 2010, I've watched more and more "Big Business", make this park their focus. I personally would rather see the park close, than expose it to further "proposed" improvements, that only plump some companies bottom line.

Perhaps there is more to be said about scheduling and managing existing rather than giving in to pressure to "change".

I choose NO Change. Leave Alaska alone. Leave Big Business and Big Government out of this.

Correspondence ID: 231 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 19:36:11
Correspondence Type: Web Form
Correspondence: The Resource Development Council for Alaska, Inc. appreciates the opportunity to comment on the Denali Park Road Vehicle Management Plan.

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC supports increased access, by visitors and residents alike, to scenic wonders like Denali National Park. The alternatives outlined in the Vehicle Management Plan, all of which maintain the vehicle limit of 10,512 as set in the 1986 General Management Plan, are favorable and offer a number of ways for visitors to partake in all the Park has to offer. RDC understands that visitors to Denali National Park desire the Alaskan experience of wildlife viewing in a scenic setting, and action made to maintain that opportunity for visitors is applauded.

Thank you for the opportunity to comment on this important issue.

Correspondence ID: 232 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 20:05:54
Correspondence Type: Web Form
Correspondence: Last spring, the professional nature photographers' group volunteered to discuss concerns and suggestions with you regarding the Denali Draft Vehicle Managemnt Plan, and to help the park design a mutually beneficial policy concerning pro-photo permits and a win-win arrangement that could benefit everyone. You and all of us spent many hours working together toward this goal.

Why did we even bother? I am incredibly disappointed by the the draft of the Draft Vehicle Management Plan. Unfortunately it does not appear that our suggestions were considered in the slightest. It ignores our proposals and any sensible solutions that were offered. We apparently were mistaken when we thought our work and comments were appreciated.

If appears that requests for public comment is only window dressing and that those responsible for drafting this document had no intention of listening and will implement what they want anyway. To exclude veteran users and enthusiastic promoters is ridiculous.

After studying the document, the winners appear to be large cruise ship operators and the losers will be the independent travelers, especially Alaskans. For decades large tour companies have lobbied for increased bus access into Denali. What happened to the fact that the public was assured that since tourism had declined due to the economic

recession that the Park Service would develop a new road plan and do it right. This draft plan does not do it right.

Two alternatives actually restrict road use by limiting time spent at wildlife stops, in scenic areas and even at rest areas. This is not more "flexible" but just gives more access to large tour operators.

I support Alternative A (No Action) for the following reasons (as pointed out by Tom Walker):

? In order to be implemented, Alternatives B and C would establish a new layer of monitoring bureaucracy within the park staff. Each alternative would require at least $1 million or more additional funding per year over current park funding levels, with average annual costs for Alternative B running more than $5 million based on a 20-year plan.

? In 1971, prior to the controlled-access shuttle bus system, the National Park Service made a very specific agreement with the public: you give up your private vehicles and we will provide you with free bus access. NPS arbitrarily reneged on this agreement when substantial fees were charged beginning in the 1990s and the "shuttle" system's name was changed to the "Visitor Transporation System (VTS)." In neither Alternative B or C is there any guarantee or commitment to affordability.

? Alternatives B and C give too much power and discretion to future superintendents. One bad superintendent, swayed by commercial interests, could have long-lasting negative impacts. To counter this threat, a specific and finite cap of road traffic must be retained but is missing in Alternatives B and C.

? Tour participants, backpackers and day users would ride the same buses with the current "Green Bus (VTS) system" becoming a cheap tour option. In peak season every bus would be filled to capacity.

? Any plan that would increase the number of buses on the park road should be disallowed as it is within reason to believe that increased bus traffic has negatively impacted wildlife viewing opportunities along the road.

? Alternative B would eventually phase out private vehicle access to Teklanika Campground and "phase in tents-only campground over a 10-year period." Only recently has tent camping been reinstated at Igloo and Teklanika campgrounds after closures due to bear and wolf activity. This action would enable an increase in bus traffic by removing private vehicle access to Teklanika, at the same time discriminating against senior citizens or others unable or unfit to tent camp. Teklanika is a wonderful experience which should not be kept from the average tourist or Alaskan user.

Alternative B is a disaster. Maximizing the number of visitors and minimizing empty seats on the buses would significantly degrade many visitors' park experience. A full, crowded bus is never a preferred means of travel for anyone anywhere any time. Combining the economy self-guided tours with the transit function of the bus has several drawbacks, but crowding is the chief negative.

In regards specifically to professional photographers permits:

* NPS should manage the Professional photography and commercial filming separately. There are very different requirements for the two types of use. If there have been abuses to the commercial filming permits, fix that, don't ruin the still photographers system.

* The idea of the Professional Photography program being segmented into two permit zones (Savage to Toklat & Toklat to Kantishna) is totally preposterous and unworkable. This has not been thought out and could not be implemented. Drop this ill conceived idea right now.

* Permit programs limited to two permits per day for the entire road system: Photographers are willing to give up permits in prime time summer, but permits in early spring and in fall should not need to be reduced for any reason.

* It is not feasible for Professional photography and commercial filming permitees to be provided with one dedicated vehicle with the transportation system each day. Landscape photographers and wildlife photographers have entirely different needs and the two do not mesh. Neither do film photographers needs mesh with still

photographers. Whomever thought up this ridiculous idea is obviously not talking to the users and has no concept of how the system works now.

* Professional photographers access the park via the transportation system: It is totally unfeasible to do "professional" work from the buses accept by accident. Any of the potential changes to the current program would dramatically affect a professional photographer's ability to get access to the park and would limit the photography available to the buyers marketplace, including the ATIA, ACVB, State of Alaska, etc.

NPS should think of the photographers as a valuable partnership, not unlike the railroads were in the 1920s. Remember how directors Mather and Albright encouraged the railroads to develop access routes to bring east coast tourists west? Getting people to the parks back then was essential in building public support for increasing the park service's budget. A hundred years later, transportation is easier, but people have more choices. They don't always come to the national parks, opting for amusement parks, cruises, or even overseas destinations. The federal budget deficit is under severe pressure and the parks can expect to take a reduction. Once again, public support is essential. The photos taken by professionals not only find their way into traditional publications but also the social media and internet where the battle for people's attention will be won or lost.

Correspondence ID: 233 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 21:15:08
Correspondence Type: Web Form
Correspondence: PARK ROAD COMMENTS

All 3 alternatives make use of tour buses going to Wonder Lake and I am patently against that. I worked about 12 seasons in DNP as a ranger and truck drive and trail crew. I have not like how I have seen the Park change and widen the road past Eielson. I feel that the long term goal is to get more people to "the end of the road" NOT because it is so special and they'll see more animals, but soley because it is the end of the road. I speak to people all the time who regret having taken the bus to Wonder Lake?not everyone wants to sit on a bus for eleven hours.

The park should give some serious consideration to the medical needs that they now have with elderly visitors on the buses. Expanding the tour bus service Wonder Lake would mean people would be even further away from help. This would in turn probably mean an ambulance system being put in place for WL and maybe a heli pad, etc. etc. I believe there is a movement with the State, industrial tour companies and the park services to open up Kantishna and to pave the way (literally) for a loop road through Stamped and expand the services in the WL area.

I think concessioners would love to offer longer tours that cost more money, take care of their clients all day long but in reality do not deliver a better experience. The park should focus more on making a great park experience without going to the end of the road. I do not think that all people want to take a long bus ride it is more that they are not educated before hand and sign up for something months ago from their cruise ship brochure.

I think that ALL professional photo permits should be eliminated immediately! This is one very easy way to lower the number of vehicles on the road. Looking at the original intent of the profo permit I think we can safely say that it has met the need, Denali is discovered. Instead artists should apply for the artist in residency program and limit it to that.

Commercial filmers can do they same?.take a bus or go backpacking or flightseeing.

All employees should be able to take an employee shuttle to and from work at WL and Toklat. When I worked at Toklat that option was not available and I had flat tires and wear and tear on my vehicle that I didn't need or want. I can see the need for employees to have their private vehicles but they should be restricted in traveling on slower times of busyness on the road.

The Economy tour must go to Eielson VC as in Option 3. Teklanika is not far enough. It should go to Toklat instead and Stony Dome if the mountain is visible.

The camper bus should somehow figure into the picture or a better idea of how the backpackers and bicyclists would be handled.

I think tour buses should pick up any passengers that they see waiting for a ride. I'm sure the passengers wouldn't mind talking to someone who had been out backpacking or

day hiking (although they might not want to sit next to them!)

I am leery of the action B and C that does not state a cap on the number of vehicles. It is not clear whether the 10,512 number is being done away. I'm not sure how that number was determined but if we are now meeting that number than there are too many buses on the road and I do not want to exceed that number in those alternatives. I would like to see a better explanation of how that number will be spread out over the season. In B and C it doesn't say clearly enough what the number will be.

Correspondence ID: 234 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 21:17:51
Correspondence Type: Web Form
Correspondence: I would rather not have any action on the Park Road transportation system then to allow the system to be taken over by the big tour companies Which will happen under alternatives "B" & "C". I can only support alternative "A" No action. The Park Service has made promises to Alaskan in the past and reneged on them concerning the road system into the Park. I do not trust the Park Service!!!

Correspondence ID: 235 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 22:46:56
Correspondence Type: Web Form
Correspondence: I have worked in Denali since 1993, and been driving shuttle for 14 years. I like the VTS system as it is, think what we have was not designed from top down but more evolved over time in response to what works and what people want. That is the schedule feels very natural to drive, the amount of time you spend at rest stops, photo stops, and wildlife stops is about the length of time most passengers feel comfortable with. It needs and gets minor tweaks here and there, especially when it comes to getting hikers along the road and at Eielson at busy times of day, but generally works well. Complaint I hear regularly is about where we bring people to at Wonder Lake, it's not where people want to go. You don't even get a very good view of the mountain from where we take our break at the lake. I have arrived there, had it come out five minutes into a half hour break but many passengers don't notice it until we are on the bus half a mile past the campground bus stop. Most people on the day trip want to see Reflection Pond and the North End of the Lake where the photos are taken with the mountain behind the water. If tours did go to Eielson, crowding could be a problem. There are times of day now when every parking spot is full, and the visitor center is very crowded inside, especially in bad weather. Longer buses to Teklanika? It would be frustrating at Ptarmigan stops or where there is a moose that can only be seen through a narrow window in the trees. Keeping packs outside the camper bus, they would get muddy or dusty underneath the vehicle, and it could be dangerous loading heavy gear towards the roof. Less crowded buses make for a nicer passenger experience, and better if you are on the roadside with small children, car seats, and gear waiting for a ride. Thanks for your attention -

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Correspondence ID: 236 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 22:54:37
Correspondence Type: Web Form
Correspondence: Dear Superintendent Anderson,

Thank you for the opportunity and for extending the deadline to comment on the Vehicle Management Plan and EIS.

I have reviewed the plan and consulted with others I trust, the DCC, as well as a diverse group of friends and neighbors who have lived and worked in the area for decades. I have lived and worked seasonally in and around the park since 2005 and am currently a part-time resident of Healy.

My strongest feelings go to the communication and community interaction aspects of this process. I've spent the past two years earning a graduate degree in public health, and one of the most meaningful lessons for me has been that as 'experts' we have an obligation to present communities with information, research, plans, and outreach that is useful to them. I am confident that a great deal of excellent, quality work has gone into the plan, indeed I am impressed by the research that has been conducted and excited about its potential applications, but I believe it falls victim to the same issues that have plagued many in my field, in its current form it is presented as too opaque for the community's own good.

I share the concern expressed by DCC and others that "annual reconsideration of limits will be much more subject to outside political pressure and manipulation than a clear, stable regulatory standard." The idea of "managing to a standard, not a number," while tempting in theory, just obfuscates the fact that there will always be a number, and the plan certainly does not instill confidence that the process of creating it will be transparent or readily presentable to the public.

It is my usual personal inclination to delight in the evolution of systems and integration of scientific study and standards to improve our lives. I reject blanket Not In My Back Yard responses or resistance to change as selfish and myopic. It is therefore with great reluctance that I say I tried very hard to understand and embrace proposed

changes but found too much missing and can only support alternative A, no action, and future revisions to the plan along the lines of the DCC's suggestions.

I am honored to be attending the American Public Health Association's annual conference in Washington, D.C, and was excited to hear NPS Director Jarvis speak at our opening ceremony yesterday. His comments on access to quality outdoor experiences as a treasured legacy, basic right, and positive influence on the health of communities were inspirational. I therefore agree with DCC and others that treating transit as a public, and not commercial, service is important, and comparisons to commercial buses are inappropriate. Standards for affordability should be based on lowest possible cost.

Thank you for your consideration, (To be frank, I know firsthand public comment is a difficult process. I'm grateful for your work and wish you good luck!)

Correspondence ID: 237 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 23:13:41
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment.

I have been an Alaska and Fairbanks resident for 16 years. I have been in Denali National Park numerous times mostly day hiking and often with a car camping night sandwiched in. I have led a number of hikes off the road for a local hiking club.

My frustration with the current vehicle plan and this is from personal experience is the difficulty in getting seating spaces on the regular buses for groups of hikers. I can establish a date and location to meet on the park road. Then individuals have to book reservations individually which involves often different buses and arrival times.

The current system does not have the capacity or the flexibility to accommodate groups that want to use the visitor transportation system. I did not see this issue addressed in the vehicle management plan. I apologize if it is addressed. It is difficult to read the various sections on line as pdf files.

This whole vehicle plan seems to be slanted towards accommodating business investments of corporate America in the Denali Park area and turning the park into a theme park for their clients. The average American person cannot afford to pay 150.00 a night for a room in Denali Park Area. That seems to be the market segment that the NPS (National Park Service) is accommodating.

Many of us who want a cheaper experience and one that allows us an easier access into the national park seem to be left out of the plan. I looked for a rationale without success for this magic number of 10512 seasonal trips allowed on the park road. The 3394 trips allocated for the regular buses in my judgement is too low as a share. Neither alternative B or C will change transit access to the wilderness area significantly though tour buses may increase in alternative B. It also seems to be that the private in holdings receive an inordinate share of the pie with its 1360 trips. I question also whether the 1754 permits allocated for daily NPS operations excluding road repairs coming out of the total is realistic. That is over 10% of the total trips. Can you think of any other road in America that has that many public vehicles as part of the vehicle mix?

The vehicle management plan does not seem to differentiate between Alaskan and local area residents who may want a different experience in the park from the lower 48 tourists. I live here 12 months a year. This park is in my backyard. Certainly it is an easier trip for me to reach the park than the lower 48 travelers but unfortunately it is sometimes difficult to access the wilderness in the park from the park road. Denali National Park is a jewel and I think it is under appreciated by Alaskans because of the wilderness access difficulty. The NPS should be doing more to build a local constituency to support this local national park. The vehicle management plan can be such a tool if it encouraged local and Alaskan residents to visit the park.

Correspondence ID: 238 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 23:24:42
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to submit comment on the Denali Draft Vehicle Management Plan. I am a long time year round local resident, a Denali National Park employee for over 20 years, and professional nature and wildlife photographer.

I first grew to know Denali National Park in the 1980's, during a time when shuttle bus access was free and campgrounds remained open during the off season. I lived in Fairbanks at the time, and often traveled to Denali to enjoy it's unique combination of landscape and viewable wildlife.

After a review of the three provided options, I must express a preference for option A. My main concern is the removal of a definite cap on vehicle numbers. Without this limit, I fear that it will be much more difficult to address pressure from commercial interests to raise the numbers of vehicles allowed. If such an allowance were to be made, it would be very difficult, if not virtually impossible, to reduce that number again.

While the current administration may be prepared to hold the line with regard to vehicle numbers, changes to the Vehicle Management Plan will affect the park and its resources long after the current administration has moved on. I see a potential for an irreversible increase in traffic as time goes by.

I am also concerned with the affordability and availability of the current Shuttle system. My repeated trips to Denali, taking advantage of a very affordable shuttle system, are what helped me grow to love this place, which underpins the reason why I work here. I am very concerned that future access to the park may exclude travelers that don't have the financial resources to journey into the park even once, let alone several times a year, as I did. Over recent years, I have heard from several people who decided against traveling through the core of the park because the transport system cost too much.

I feel that any shift towards providing a visitor experience that primarily favors the one-time traveler would do a disservice to the stated mission of the National Park Service.

Correspondence ID: 239 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 23:59:07
Correspondence Type: Web Form
Correspondence: To Superintendent Anderson and the Vehicle Management Team:

I am strongly in favor of option A : keep things as they are.

I have worked in Denali since 1978 and have lived here for 15 winters and have driven a VTS bus for 17 years. The last six summers I have driven the overnight camper bus and have seen first hand hundreds of times the difference in the Park between "off" hours and peak - here comes the tours - times of day. In the interests of wilderness and the preservation of the core values that Denali embodies I can not understand any scenario that would put more people in buses for the sake of change. If it was up to me I would restrict the day trips to Kantishna, space out the A.M. departure times of the TWT's, and reduce the amount of permitted vehicles on the road.

Ultimately the idea is to do what's best for the Park and it's inherent worth. Offering more options, increasing passenger distances, having more and more people go beyond Stony and the EVC, would compromise it's waning integrity. I say "waning" not lightly - I'm sure you have heard this before. The wildlife sightings have been on a noticeable decline for years now. EVERY bus driver would corroborate this impression.

I have read the Denali Citizen's Council comment carefully, and to save time as far as the details, I believe they're points of opposition are spot on.

My opinion is vested in a great passion for the Park. And is simple: Please keep things as they are. Enough is enough. Thank you....

Correspondence ID: 240 **Project:** 22494 **Document:** 42309
Received: Sep,10,2011 00:00:00
Correspondence Type: Letter
Correspondence: Duplicate entry from ---. See comment 111.

Correspondence ID: 241 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,17,2011 00:00:00
Correspondence Type: Fax
Correspondence: I would like to support Alternate A.

Correspondence ID: 242 **Project:** 22494 **Document:** 42309
Received: Sep,22,2011 00:00:00
Correspondence Type: Letter
Correspondence: We have reviewed the National Park Service (NPS) draft environmental impact statement (EIS) for the Denali National Park and Preserve (DNPP) Vehicle Management

Plan. Our review was conducted in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act. Based on our review, we have assigned a rating of LO (Lack of Objections).

For your reference, a copy of the rating system we used to conduct our review is enclosed. We believe that the draft EIS does a satisfactory job of analyzing a reasonable range of alternatives for vehicle management, as well as the impacts associated with the alternatives. We appreciate the NPS 's consideration of the visitor experience in addition to the traditional impacts to environmental resources.

While we believe and agree with the NPS that both Alternative B and Alternative Care environmentally preferable, we also recognize that Alternative C provides greater types of visitor opportunities, thus enhancing the public 's appreciation of DNPP resources, which can have additional benefits. Alternative C may also provide more opportunities to lower income and disabled visitors. We fully support the adaptive management strategy identified in the draft EIS and believe that the flexibility provided by that strategy will enable the NPS to minimize impacts while enhancing visitor experience for many years to come.

Thank you for the opportunity to review this draft EIS. If you have questions about our comments, please contact me at …

Correspondence ID: 243 **Project:** 22494 **Document:** 42309
Received: Nov,03,2011 00:00:00
Correspondence Type: Letter
Correspondence: When I first glanced at the plan my immediate thoughts were what are we trying to do here that is different from what is already being done. The only difference I noticed was a desire to reassess yearly the allowable vehicle count per year and the addition of a self-guided tour. I saw the general intentions of Alternative Band C but it seems that is what is being done now under the current system. Here are my comments as best organized as possible. Providing data for the adaptive management plan will be expensive. Will the funds for this study always be available based on the political and economical scene.

Do not annually revisit the limit of buses. Too expensive and too many variables such as up and down cycles of wildlife seasonally and population cycles, for example. Monitoring impacts to wildlife is good but not to change annually the total yearly vehicle count. Every 5-10 years is sufficient. Carrying capacity of bus traffic in park is not going to hugely change. Vehicle limit needs to be set as a firm limit rooted in improved information gathered through the park road study. Vehicle limit needs to be protected from political pressure.

Affordability of access is nebulous issue. You can not satisfy everybody. There are always those who think they should get in the park for nothing. So provide access for different affordability. Access according to different tours or transit or lodge buses should be balanced according to demand. Denali Citizens Council feels lodge buses are a duplicating access. They are not. They offer different activities and different tours.

Tours may be expensive and possibly could be reduced in cost. But tours (particularly Tundra Wilderness and Kantishna Experience) sell the park. I feel more people who ride the tours return home to be "friends" or ambassadors of Denali N.P. and activists for the national parks. Tour drivers are all getting the message out there about nature awareness, climate change, respect for wildlife, ecosystems, etc. The comments heard most frequently on tour buses are "awesome or super trip", "changed my life", or "trip of a lifetime", or "well worth it". I have driven all tours, lodge buses, and VTS buses and the above comments are heard usually on tour buses.

All access (tours, transit, lodge) types are important. They are all important because there are always different kinds of people with different desires and styles visiting the park. Making Denali Natural History tours go to Teklanika might be an improvement but the shortened tour is usually a disappointment to people because they are not traveling much of the Park Road. But availability of DNHT tours is important because tour companies do not leave enough time for Denali N.P.

My conclusion is that I really favor Alternative A just because Band Care so vague. Like the Denali Citizens Council I would not mind reassessing the total vehicle count, but not annually, based on new data but I firmly believe in an established total vehicle count that is not changeable until after a review study maybe after every 5 or 10 years. A carrying capacity for visitation to Denali N.P. is not going to increase much. Carrying capacity is probable in the long run fairly consistent. We must protect this park from "loving it to death." Give the visitors choices in accessibility as well as affordability. Set up the selfguided tours on the VTS buses but do so by having a booklet to accompany the visitor that they could purchase. In this way the self-guided tour would not interfere with the VTS bus drivers commentary (that is if you have a bus driver that narrates). Accessibility, variety of opportunities (Alternative B and C) are both important. Having a firm total yearly vehicle count that does not change yearly is important. So tweak the current system to make the park more accessible.

Correspondence ID: 244 **Project:** 22494 **Document:** 42309 **Private:** Y

Received: Nov,03,2011 00:00:00
Correspondence Type: Letter
Correspondence: Thank you for your efforts in planning and trying to come up with effective and efficient transport systems for the park. I have a few issues which are very important to me and my business and inholding that I want to make sure are not overlooked in this process. When I purchased my inholding in the year 2000 I made a verbal agreement with then Superintendent Steve Martin that I would utilize the VTS system as much as possible for my staff and overnight guests. I do not provide my own ground transportation for my guests and keep my road use to a minimum. I was assured by Mr. Martin that in exchange for reducing my road use that I would be guaranteed seats for transporting my guests to Kantishna. For the record on page 44 of the plan you mention: Four lodges in Kantishna offer overnight accommodations. Overnight guests are transported to the inholding by inholder-operated vehicles along the Park Road or via aircraft to the Kantishna airstrip. I want to make clear that my guests bus in and out on the VTS system and some of them choose to fly one of those legs. I want to make sure that my guests have access via the VTS system. Currently the system works fme for my guests. The timing and number ofbuses currently is adequate for transport to and from the park entrance to Kantishna. If the VTS system provides adequate access then I will not have to provide transport to my guests in the future which I think is a desired condition for all involved If in the future seats become unavailable or to limited I will have to resort to starting my own transport system. Currently our overnight guests use the VTS system for accessing the Park for day use activities such as hiking, biking, photography etc. One bus departs Kantishna in the AM with several buses in the PM for return travel. One problem we have had is if that one and ouly bus in the AM is full our guests cannot exit or access the park until the middle of the afternoon. Perhaps more shuttles /to from Kantishna to Wonder Lake campground would solve this problem. A small van transporting guests and campers to and from Kantishna to the wonder lake campground to meet the VTS buses would reduce large vehicle traffic into Kantishna and provide more access into the park for Kantihsna guests. Perhaps a Kantishna inholder could provide this service (and even be on demand) and the VTS system would run no farther than Wonder lake.

Another request we would ask is to allow for more bicycles to be placed and transported on the vts system from Kantihsna. Currently no more than 2 bikes can be transported on a bus at one time. We often have families and groups of more than 2 that get denied to go back into the park. External bike racks could solve the problem and offer more access for this much desired activity.

We have had a large increase in guests wanting to fly into Kantihsna and taking an afternoon VTS bus back through the park. This activity provides a great experience for guests as well as filling normally empty seats on our aircraft returning to Kantishna and the VTS bus leaving Kantishna. I would request that enough buses or seats be available to accommodate this desired activity in the future.

The NPS is tasked with Protecting the resources and wildlife of this great park. I believe this should be the main driving issue when deciding how to manage the transportation system in the park. I believe with efficient scheduling of the buses more passengers can access the park without greatly increasing the number of buses per year. Unfortunately none of the alternatives provide the best solutions. I am concerned that alternatives B and C will require expensive oversight by NPS that may not even be funded in the future. From what I have seen the park road studies of the past do not seem to give much in the way of substantiated facts as to whether increased traffic effects wildlife viewing. I worry that for the estimated cost of a million dollars a year that NPS will not be able to do much better than past studies in measuring effects and steering decisions in the future. Every experienced bus driver I know will attest that the number of wildlife sightings has decreased over the years yet no study seem to back up this very valuable opinion. Choosing an alternative that requires such expensive and subjective over sight does not seem financial prudent. I implore NPS and the US government to try to be more responsible and sustainable when making decisions of how to spend our tax dollars. With tax revenues on the decline I do not see funding being available in the future for anything other than necessary projects and maintenance. If Alternatives B or C are chosen and no funding is available how will NPS carry out the chosen Plan? That being said I feel there are many good ideas in these plans to utilize bus seats and increase access.

There is no doubt that increase in park visitation will continue. So we need to determine how to maximize ridership without greatly increasing vehicles on the road. My two cents are below:

Reducing NPS employee vehicles should be addressed. Every employee working inside the park currently can drive their own vehicle to and from their work place for each work period. Mandatory carpooling should be required or they should be required to ride the same system the general public is required to use.

Park visitors should not be denied access to the park because of inefficient park policies. Any bus traveling east bound regardless if it is a tour/camper or transport bus should be allowed to pick up hikers and campers.

Day bus tours provided by Kantishna inholders should be under commercial use authorization and required to pay concession fees that will help maintain the park road and restrooms and other services used by such activities. Kantishna inholder transports since they are traveling the park road daily should be able to drop their guests and

employees in the park or at Eilson visitor center. This would reduce demand on VTS seats that could be sold to others.

I understand there are vast rules, regulations and policies that make this project a very challenging process. But I urge everyone to envision ideas to use the existing system in a more efficient and effective way.

Correspondence ID: 245 **Project:** 22494 **Document:** 42309
Received: Nov,04,2011 00:00:00
Correspondence Type: Letter
Correspondence: Duplicate entry from …. See comment 214.

Correspondence ID: 246 **Project:** 22494 **Document:** 42309
Received: Oct,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: This was a duplicate comment from …. See comment 87

Correspondence ID: 247 **Project:** 22494 **Document:** 42309
Received: Oct,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: I live in Alaska and have been visiting Denali National Park for more than 15 years. During the course of multiple visits I have seen a significant degradation of the wilderness experience:

1) Steady increase in crowds and vehicular traffic that amounts to crowding. 2) decreased animal sightings and what appears to be increased habituation. 3) Increased traffic has meant more graders, bulldozers, backhoes and trucks. I don't believe this increase in heavy construction machinery is compatible with either wildlife or wilderness.

Please do not adopt any park policies that will allow for further degradation of what ought to be pristine wilderness park. Pleaes resist tour company lobbying for increased traffic. America owes Princess Tours nothing. Please preserve Denali national Park and Preserve.

Correspondence ID: 248 **Project:** 22494 **Document:** 42309
Received: Oct,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: With memories of visiting Denali National Park via the Denali Hwy many years prior to the Parks Hwy being build, our family only supports alternative A (No Action).

Correspondence ID: 249 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: We appreciate the opportunity to respond to the Draft Denali Vehicle Management Plan/Environmental Impact Statement (DDVMP /EIS). NPS management plans have become increasingly complex over the years. We hope that we have interpreted the draft correctly and that the following comments will help inform the planning process.

Background The park road has played an integral role in our association with Denali National Park since the 1950s. Collectively, we have been members of the Denali community since 1959, managed the park concession in the 1960s, and have been national park inholders conducting business on our four inholdings in the center of the park since 1975. Our operating company, Denali National Park Wilderness ,Centers, Ltd., db a Camp Denali and North Face Lodge (DNPWCL) provides in-depth, active lean't_irg'qq~ehtures for national park visitors. Each of the lodgings accommodates about 38 guests for minim stays of three or four nights. Many visitors stay a week. The operating company provides its own guest transportation over the park road, which occurs on Mondays and Fridays with two or three buses config11red ~o seat from 20 to 32 passengers each.

ANILCA Access Frorri the time of their homesteading just outside the park's western boundary in7the 1950s, the properties we now own have depended solely on the park road for personal and business access. Surrounded by parkland in 1980, adequate and feasible access to them was clarified in the Alaska National Interest Lands Conservation Act{ANILCA), Title XI, Section 11iO(b) and in its implementing regulations, Parts 36 and 43 of the,Code of Federal Regulations {CFR). Then under the 1997 Denali Entrance Area and Road Corridor 7 Development Concept Plan/Environmental Imp<!Ct Statement (1997 DDCP /EISJ.c of the 1360 vehicles allocated to Kantishna inholders out of a total of 10,512, DNPWCL was allocated 315 vehicle round trips for both-l6dges combined. Since the 2000 Federal Register was published,

DNPWCL allocations have been apportioned on an annual basis for the restricted portion of the park road.

Access for concession-contracted educational field trips DNPWCL also operates educational field trips into the old park for Camp Denali and North Face Lodge park visitors through a concessions contract. Under 36 CFR 13.305 and 13.310, the company is recognized as an 'historic operator" relative to its uses of parkland, and the 2008 Consolidated Appropriations Act, DivisionF, Title I, Section 129 specifically defines those uses. Relative to this management document, 28.DNPWCL vehicles per week are allowed into the old park in support of educational field trips and 70 vehicle trips per week are allowed as far as the Wonder Lake Campground Preferred Operator because it is a local business, DNPWCL is also considered a "preferred operator" as described in ANILCA, Title 13, Section 1307 and 36 CFR 13.305 and 13.315 for provision of visitor services for which the National Park Service {NPS) determines it is qualified to offer. Thus, the company would have the same priority as a m6st affected 7native corporation when bidding concessions contracts it is qualified to undertake. 7

Adaptive Management and a Case for Other Alternatives Although adaptive management is routinely endorsed, according to more than one policy analyst, it commands few success stories. (Doremus, Holly, "Adaptive Management as an Information Problem," North Carolinas Law Review Assn., 2011, page 3 and Gregory, Robin, et al, Adaptive Management and Environmental Decision Making", Ecological Economics, 72005, page 435) Questions arise over scientific uncertainties that are revealed in weak indicators and standards, exceedingly long time frames, 7extraordinary costs, oversight complications, extended controversies over tentative management decisions, and its potential for misuse for political ends. (Dorem)ls, page 3) Its value is now seen by some hot so much as a general management approach. but as a specific initiative within a larger management plan. (Failing, Lee, eta!, "Using Expert judgment and Stakeholder Values to Evaluate Adaptive Management Options," Ecology and Society, 2004, page 9 and Gregory, Robin, et al, Adaptive Management and Environmental Decision Making", Ecological Economics, 2005, page 436) If the NPS had communicated the pros and cons of various management strategies for this particular application and if adaptive management had survived a costjbenefit analysis, we and perhaps other stakeholders would be more convinced of the decision to employ it.

Adaptive management is surely the best strategy for certain management problems, but is Denali's vehicle use one of them? The Denali transportation system is not a new or unfolding experiment. It has been in existence, studied, and tweaked for nearly forty years.7 Recent research led the NPS 'to use current conditions as the baseline for indicators and standards, and over and over again the ~ draft reveals that the established standards are generally being met. (DDVMP, Appendix C, pages 16, 18,22,24,25) In effect, the present transportation system is not broken and appears to work reasonably well in fulfilling today's visitor expectations for observable wildlife and for perceptions of crowding, and is not exacerbating long-term, moderate, adverse, and local impacts to wildlife and .wildlife habitat. It could be argued that the recent panoply of research under the Road Capacity Study rubric has provided the NPS with not perfect, but sufficient scientific certainty to consider two other alternatives:

1 .. Amend the 15-year-old Denali Development Concept Plan Environmental Impact Statement. This alternative would seek to improve current resource conditions and visitor experience by better managing the current level of vehicles under a traditional management approach. It would avoid long and costly adaptive management by incorporating improvements identified through recent and ongoing research and modeling. Continued science, monitoring, and modeling could still occur as evaluative tools. An opportunity to consider such an option seems particularly responsible in light of foreseeable challenges to NPS funding in coming years.

2. Adopt the current ceiling plus an expansion of the Premium Short Tour to Teklanika at the current daily limit and employ adaptive management to improve current conditions. This alternative would recognize that the Department of the Interior's current policy encourages the use of adaptive management as a uniformly b~st strategy, comply with the draft's stated need for such an approach, and expressly seek to improve current .resource conditions and visitor experience through improved vehicle management. According to the draft, a similar scenario was dismissed prior to full analysis. In conversations with both the travel industry and the environmental community, it seems both entities fear that adaptive management will either result in significantly more or less vehicles than presently assured in regulation. Managing vehicles within a defined ceiling that can now be traced to the results of the road capacity study might be more acceptable to stakeholders than the NPS assumes.

If an alternative that relies. on adaptive management outside of a firm numerical ceiling rules the day, the final plan should include reassurances. Many stakehold~rs will be affected and for will be required to invest in its implementation. For any' likelihood of success, their initial buy-in and continued support throughout a lengthy time frame is essential: ? Confirm a predictable, accountable funding source. Prolonged implementation7because of inadequate funding should not be an option and neither should the use of any funding source that reduces accountability. ? Define an outcome that results. in a final annual and daily carrying capacity for the p,ark road that replaces tfie current 10,512. We are unsure of the end result of adaptive management in this application. The superintendent's introductory piece in the workbook states: "A significant part of the task at hand is determining the true carrying capacity of the park road." [Denali Park Road Planning Workbook, 2010, page 2). The draft plan, on the other hand, implies that managing adaptively is an end in arid of itself .. This must be the case if the Service's intent is to promulgate the superintendent's discretion to annually set maximum capacity according to indicators and standards in7 the Code of Federal Regulations (DDVMP, Executive Summary, page v)

If indicators and standards can be altered over time, if unreliable funding sources deter implementation and if no end game is envisioned, certainty plays no role in adaptive

management. An unending opportunity to add to the knowledge base is Ideal: However, even a two-year lead-time for ongoing management changes ove7r time will be onerous for stakeholders.7 Moreover, a strategy that does not lead to a certain outcome is unreasonable for either stakeholders or for policymakers.

? Include annual reporting of monitoring results and 5-year evaluations with course corrections presented to the public. Because the current transportation system is far from dysfunctional, a 15 to 20-year time frame to adaptively manage this transportation system may be7longer than necessary. Assessments would serve to identify an informed carrying capacity policy if no future experimentation were to occur, then calculate the cost/benefit of how much improvement could be obtained from that baseline if perfect information were available.

? Form a stakeholder group to help inform the implementation of management/mitigation strategies and assure mutual accountability. Having too many disparate voices at the table can be unwieldy, but, without a voice in the prescriptive process, stakeholder~ can only comment on numerical data after publication of the superintendent's compendium. Responding to the implications of suggested strategies to stay within standards should strengthen the process. Without input, continued stakeholder support and willingness to participate honestly in the process is less likely over the long term.

? Address concerns about indicators and standards. 1. Modifications to indicators and standards lf visitors sense crowding at rest stops, are vehicles reduced or are parking lots expanded? At face value, rest stop design standards are the most definitive of all the indicators, because the standard has finite physical constraints. But wh.at defines the indicator? Does it only refer to current build-outs? .Does it also include currently authorized expansions? C_an this indicator include enlarged parking lots or new rest stops promulgated through environmental assessments?

On its surface, the indicator for the Teklanika rest stop means that it should not exceed its current capacity for all users despite a potential influx of Premium Short Tour buses: Nowhere is an expansion of the current Teklanika rest stop addressed, but it is included in the cost analysis for alternative C. (DDVMP, Appendix B, page 265) 7 Given the proposed Premium Short Tour to Teklanika and new destination to Eielson Visitor Center, rest area design stahda.rds could be the most salient limiting factor in bus numbers. 'But, the plan uses a potentially fungible and therefore questionably valid indicator. If indicators and standards frame the very core of an adaptive management plan, yet are not transparently described and are subject to change, the entire approach seems weakened. (DDVMP,. page 73)

2. Reliable indicators and standards Given that the Service's primary responsibility is to preserve the park's resources first, so that future generations have something to enjoy, this plan relies too heavily on visitor experience indicators. Four visitor experience issue~ and two natural resource issues inform the plan as indicators. Although a third natural resource condition issue was listed, the draft stated that related indicators would be established but due to their complex nature, no standards would be identified. (DDVMP, page 76)

Visitor Experience Related . The visitor experience indicator of hiker wait time is clearly objective and measurable. Although7the others were formulated from certain measurable survey questions, they still represent countless variables in human perspectives. For example, respondents were visitors; who would largely view their experience as positive if they have spent time and money to visit in the first place, and they lack valid comparisons. The-technique of using photos seems flawed, because in actual experience visitors on a bus are looking out a side window and do not readily see how many vehicles are in front of or behind them.

Natural Resource Related The challenge in identifying reliable natural resource indicators and standards is evident in a statement by the architect of the plan, Deputy Superintendent Philip Hooge. He stated in an interview for EJ Magazine that "There are so many factors that could alter an animal's movement it's going to be hard to prove the road is having an7effect." (Erbisch, Marc, "The Original American Marvel," EJ Magazine, Spring 2007)

According to the draft, " .... there is no strong evidence of mechanistic relationships between . .traffic volumes or patterns and wildlife distribution or movements that would lead to clear indicators and standards." Hints of negative relationships, however, warrant caution. (DDVMP, page 23) Hence, the two natural resource. indicators and/or their standards that were developed do not seem as strong as one would hope.

1. Sheep gap spacing A standard that relies on vehicle distribution to ensure 10-minute gaps for sheep crossing every hour past Teklanika is problematic as discussed below under Set pattern for vehicle. movement. More fundamentally, our direct observations over more than fifty years align with comments submitted by sheep researcher Ken Whitten, of Fairbanks, Alaska: 7 I did my Master's Thesis study on Dull Sheep habitat use in Denali, and I reviewed the sheep road crossing study conducted by]effKeay and judy Putera in the 1990s [I was Research Coordinator for the Alaska Department of Fish and Game at the time). That a 10-minute gap in traffic each hour would actually facilitate sheep crossing the road is at best a tenuous hypothesis. Higher sheep sightings during low traffic times early in the summer and lower sightings later in the summer during peak traffic are almost surely a function of seasonal habitat use, irrespective of traffic levels. Sheep use lower elevation habitats early in the summer and move. upslope [generally away from the road) as green-up progresses to higher elevations. The GPS collar data from Dall sheep in the Road Capacity Study actually showed

that most road crossings occurred during mid-day and at high traffic levels. It seems that the Park Service cherry-picked 7data to support the sheep gap spacing. This issue is important because ensuring the sheep gap times would require strict scheduling that might have no benefit for sheep, but could easily inconvenience7 everyone travelling the road. Also, the Vehicle Management plan calls for sheep gap spacing even under the "No Action" Alternative. I would oppose implementation of the sheep gap spacing

2. Night-time traffic The indicator, night-time traffic, relied on a quiet night study which demonstrated a lack of a significant impact on wildlife observations the following morning. ("Assessment of Vehicle Use and Wildlife Sightings, in Denali National Park and Preserve,". Summary Report 2006-2009, page 42) Nevertheless, an exceptional spike in traffic levels in 2007 due to a contracted road project in Igloo Canyon seems to7justify its use as an indicator even when normal average traffic appears to be about 30% less. (2007 "Denali Park Road Traffic Counter Summaries," page Z) The standard for night-time traffic should limit NPS contractor vehicles, not normal traffic.

Preferences under Actions Common to All Alternatives ? Published road design standards for Mile 73-86 For the record, as in the past we continue to support an even [not wider] road width with additional pullouts for viewing the Alaska Range's broad expanse and the variety of waterfowl in the tundra ponds between Mile 73-86. Recent roadwork has resulted in a smooth surface and better drainage, so traffic speeds have increased. Blind corners still exist; new intervisible pullouts have exacerbated dangerous hour-glassing, and road build-up has created more potentially catastrophic; steep edges along with, arguably, the perception of such among park visitors.

? Transit Priority . We agree that visitors should have a least costly way to experience the park and for that method to receive priority within the concessioner-operated transportation system. The draft states that options for visitors to be able to make informed decisions are to be addressed through the concession contract and 'ongoing7park operations. One of the frequently heard complaints is that visitors do not always learn-about a less costly option. Because transit is subsidized by tour, especially longer tours, the concessioner has a vested interest in selling tour. Booking agents also opt for tour because it is commissionable. In the future, if franchise fees are tied to the implementation of the vehicle management plan, even the NPS may have a vested interest in increasing tour. sales. To alleviate conflicts of interest, we have three suggestions: 1) Make all park transportation noncommissionable. 2) Utilize a straightforward bookingfee for all tickets, regardless of transportation type or distance. 3) Create a new concession contract expressly for tour and transit reservations. A transparent plan to assure transit priority should be included in the final document. ? Transit Affordability Affordability should be defined quantitatively, not qualitatively by visitor perception as the plan suggests. To assure transit's affordability, cost could be tied to the personal expense of driving one's own car or to the federal government's travel reimbursement rate.

Preferences under Actions Common to All Action Alternatives ? "Premium Short Tour" to Teklanika Because. the road width can accommodate non-yielding, two-way traffic and there is visitor dissatisfaction with the length of .the current Denali Natural History Tour, Teklanika may be the preferred replacement destination. Wildlife viewing opportunities will not be that much greater, so a longer road experience, alone, is not a magic solution for visitor perception of an improved experience. NPS interpretive rangers and walking paths should be included at the destination. The new premium short tour bus numbers should be incorporated into the overall transportation system in a numerically defined daily carrying capacity that' cannot proliferate by changing the design standard capacity for the Teklanika rest stop or by constructing yet another new rest area. ? "Premium Long Tour" 1. The Eielson destination We suggest thoroughly vetting the Eielson Visitor Center destination with the cruise tour industry before its incorporation as an additional tour destination: 7 a. More buses between Stony Hill and Eielson will create a longer drive time than currently exists. Add sufficient time at Eielson Visitor Center and the destination could easily add 1.5 hours to a premium long tour. b. The iconic destination may well create more interest than there will be space. Still unclear to some is that Eielson is not a Toklat, Stony replacement but another choice, the limits of which will be governed, not solely by consumer .demand as the plan states, but by meeting the plan's standards and priority for transit. (DDVMP, page 48) If a general idea of tour bus capacity could be shared in advance with the industry, it might. determine that it is too limited to market an Eielson option and could thus inform the final plan. 2. Stony Hill Overlook We do not understand the proliferation of premium tour use to Stony Hill Overlook in recent years. When it started, a few .drivers went the extra distance on dear days because of mountain views. Today, the destination is not Toklat, but Stony Hill, and it is not uncommon to see two or more buses crowded into the turnout with others turning and entering, regardless of weather. Meanwhile, transit buses are consistently sidelined to the edge of the road below the overlook. We do not advocate enlarging the turnout for additional bus parking or including additional infrastructure. We are concerned that its use has proliferated over time without consideration of environmental impacts to surrounding high alpine tundra and visitor perception of crowding. In our view, planners should address this increased pressure on this extremely dramatic but fragile area. ? Economy tour . . . . . 7A second less expensive tour sounds good in theory, but yet another tour option will be too confusing for the public. Retain the current system and rename the current VTS, "transit," because it is a more meaningful moniker. Provide optional educational value to the system for all riders. We have long advocated for a more consistent way to help these park visitors learn about the park without subjecting frequent riders or first-time park visitors tb drivers' inconsistent information delivery. We heartily endorse the rent or purchase of printed and/or audio educational materials that could be developed by the cooperating association with profits used to help underwrite the experiential education programs of the Murie Science and Learning Center. ? Set pattern for vehicle movement . East end departure intervals will need to be managed in order to accommodate significantly more vehicles at the Teklanika rest stop. Maintaining a set pattern for movement throughout the park road however, is an unrealistic demand for vehicles beyond the Teklanika rest stop . All buses are already on a schedule, and spacing is already built into drivers' sensibilities. Time is made up where possible in order to accommodate the very reasons for a park visit- those serendipitous wildlife sightings, some brief, some prolonged and those unexpected, inspiring interplays of clouds and weather on mountain scenery that contribute to a quality. experience. Amassing of buses may be somewhat mitigated by managing departure intervals but should not be

attempted through strict 'patterns of movement beyond Teklanika.

With respect to inholder access, staggered departures and maintaining strict patterns of movement are inherently problematic for DNPWCL's traditional business model. First, our Monday /Friday round trip transportation meets the noon train, buses, and private vehicles and requires a flexible 1:00-1:30 p.m. westbound departure from. the train depot for our lodges' three buses. (Kantishna Roadhouse and Denali Backcountry Lodge buses depart daily somewhat later.} An hour-long stop for a picnic dinner en-route and a pre-determined lodge arrival around 8:30p.m. are critical to our operational logistics.

With respect to eastbound travel, the three DNPWCL vehicles already depart about 0.5 hour later than Kantishna Roadhouse and Denali Backcountry Lodge. Travelling together is also a safety factor. All our vehicles are equipped with CB radios and stay within CB range of each other. The lead DNPWCL bus radios following buses about oncoming traffic, which allows for the use of safer passing pullouts and to mitigate crowding at wildlife stops. Traveling in CB range further permits our buses to pool emergency resources including personnel and satellite-based communications. In the absence of access to the park repeater system, the latter functions as our communications safety net. As for DNPWCL's concession contracted field trips, although ~scheduled, they have differing agendas for the day. They all depart the lodges around 9:00 a.m. and vehicles park either periodically or for the day and resume travel westbound between 3-4:30 p.m., arriving at the lodges for a 6:30p.m. dinner hour

Given DNPWCL's three and four-night stays based on fixed arrival and departure days, heaviest use of the park road beyond Wonder Lake occurs on Wednesdays and Sundays with up to a total of four or five vehicles- a combination of buses and Sprinter vans. Frequently two or three naturalist-guided field trip groups "carpool" aboard buses to reduce vehicle impact. As adaptive management strategies are undertaken, we respectfully ask the NPS not to complicate DNPWCL's longstanding implementation of our inholder business model and our historic operation of educational field trips.

? Improved visitor experience Included in the visitor survey of things visitors enjoyed least were malfunctioning and/or dirty windows. Openable transit windows and frequent window cleaning are two of the most meaningful, yet straightforward, inexpensive improvements for viewing opportunities and could be included in the transportation concession prospectus.

B)-IS seat spacing should also be considered in a new prospectus. Our recommendation would be no less than 39" in order to allow for gear and for aisle passengers to move closer to the window. In our experience 43" is Ideal.

7? Clarification of roadside assistance A new prospectus presents an opportunity to clarify the role of the transportation concessioner concerning breakdown and roadside assistance. In past years this type of service has generally been offered, e.g. a private hus stranded along the park road could obtain towing and other services from the transportation concessioner at fair cost. and subject to availability. More recently we have been told that this is not available; the next recourse then being to contract a wrecker out of Anchorage or Fairbanks. It is unclear to us if this topic has ever been formalized through the transportation concession in the past. We recommend that it be 7considered for treatment in future prospectuses. Cost aside, we feel there is a compelling safety concern to employ experienced, locally knowledgeable equipment operators for such tasks.

7 ? lnholder access. ANILCA Title XI The draft should c9nsider inholder access as an impact topic. (DDVMP, page 17 -24) Policies from former management plans are still in place and new directives are promplgated in this plan that affect. inholders. Applicable law and regulations are not analyzed in the appendix nor is ANILCA; Title XI, Section 1109 and CFR Part43 included in the Laws, Regulations, and Policies section. Kantishna inholders and the State of Alaska have voiced and7 written concerns about present access policies since promulgation began in the 1986 general management plan. We have.not officially articulated many of our apprehensions because we have supported the overall intents of park plans and have so far been able to conduct our business within the established parameters. But constraints accumulate. We do not doubt that the NPS has acted in good faith but do not believe the Service recognizes that an ever-lengthening list of directives can become a burdensome package over time.

lnholders' present constraints include annual allocations, spring arid fall travel restrictions, road closures for night-time road work, night-time only travel for oversize vehicles, two summers of restrictive Sunday night road closures for a quiet night research project, and this fall's complete road closure well in advance of winter snow. With the plan's implementation,it appears that further temporary or permanent restrictions may be implemented in order to maintain current conditions and/ or to test increased bus use. 7 A Denali National Park guide to inholder access has been planned for some years but has not been undertaken. In its absence, we would. find it helpful if the impacts of present policies integrated into this plan and new7 policies were fully addressed, including: 1. Clarification about the meanings of "allocations" vs. "limits." 2. Clarification about present and future inholder allocations. a. How are we to interpret the Kantishna cap o.f 1360 round trips per season and specific lodge allocations published in the 1997 Final Denali DCP /EIS, page 29 after the 2000 publication of the Federal Register 36 CFR 13.392, which contains no such allocations? b. Three lodge businesses that were of equal size in 1997 were given unequal vehicle allocations 111 the 1997 DCP /EIS, page 29. The treatment seemed inequitable at the time but was dismissed by the NPS.as fair because it considered "the unique characteristics of individual operations .... " [Federal RegisterjVol. 65, No. 118, 6/19/2000). At the time,

Kantishna Roadhouse was the only lodge engaged in day tours. Given the still similar capacities of overnight accommodations will the Kantishna Roadhouse retain its allocation of 420 if day tours are no longer treated as access under ANILCA, Title XI, Section1110(b)? c. Flesh out the broad statement about timing of road. use, vehicle behavior, and use of park facilities concerning its affect on inholders: [DDVMP, page 46) 7 d. If the 10,512 cap is lifted as a result of an adaptive management approach, how does this affect a future cap for inholder access? If determined annually, would inholders expect more communication from the NPS regarding annual allocation needs before decisions are published in the compendium? e. The plan states that commercial activity and visitor services, "including" commercial vehicle day tours, are not protected under ANILCA, Title XI. (DDVMP, page 46). 7During the lifespan of this plan, could this statement be interpreted to no longer include overnight guest transportation as access under ANILCA, Title XI, Section 1110[b)? f. 7Fully describe what priority for inholder access will be considered as management strategies are implemented. The one wild card in managing vehicles on the park road is the development and use potential of private property in the center of the park As inholders who value national park purposes, we are still reminded of the harsh reality that ANILCA's provisions for adequate. and feasible access must be honored. Even though those rights are subject to reasonable regulations to protect the park's natural and other values, they can lead to extremely undesirable outcomes. In the end, as the state of Alaska reminded the Service in a May 2006 letter regarding the 1997 Denali DCP /EIS, short of voluntary purchase of property or development rights, the NPS has limited tools to control growth. ? Concessioner I Historic Operator As an historic operator concessioner under 36 CFR 13.310, DNPWCL's vehicle use of park road for educational field trips in the old park could also be affected but is not addressed as a potential impact topic. When vehicle use restrictions are employed in order to maintain standards, does a historic operator regulatory priority apply to DNPWCL's concession contract as compared to other vehicle uses such as the transportation contract, the park's non-profit educational partner authorization, or potential contracts for day tours? 7 If some priority applies (or if it should be dismissed from consideration), should ANlLCA, Title XIII, Section 1307 and its implementing regulations, CFR 13.310 and13.315 be listed under impact topics and the appropriate law and regulations analyzed in the appendix? If a priority does exist, the appropriate law and regulation should be included in the Applicable Laws and Regulations section.

Preferences under Alternatives B and C ? Kantishna day tours After many years of conflicting messages, the NPS has decisively advanced the view that use of the park road for day tours to Kantishna7lodges is contrary to ANILCA's access provisions. Absent is an explanation of why the Service supports concessions contracts for such day tours as a complement to the park's mission and visitor service objectives, and whether they are necessary and appropriate for the public use and enjoyment of the park; and will not cause unacceptable impacts as described in NPS management policies. (Management Policies, A Guide to Managing the National Park System, 2006, page 144) This clarification is important because transit buses and tours-operated by the park concessioner already travel to the end of the park road. If the NPS-decides to_use concessions contracts for day tours, management policies should encourage competition to obtain the best service provider-and visitor experience. Because of the limited features of these day tours, prospectuses need to be written broadly enough to actually create competition.

Bus size Larger buses may create more efficient movement of people but are too impersonal,' would result in too much crowding at the Teklanika rest stop, would make passing more difficult and would not advance the perception of a wilderness experience for park visitors. 7

Vehicles at Rest stops Numbers of passengers as well as numbers of buses need to be considered. From personal safety to infrastructure overload, the human impact that the7 maximum allowable 48+ passenger buses would have on existing facilities and the surrounding environment concerns us. For example, with ten buses filled to capacity, the Eielson Visitor Center interpretive space may be reduced to mere shelter for throngs of people at times.

Vehicles in viewscapes Are there opportunities to reduce the impact of parked vehicles and equipment in viewscapes by creating new pullouts in places that are in the same vicinities but shielded from view? Such a solution at the bottom west side of Stony Hill has been discussed with the park superintendent.

Hiker wait time The standards should be tightened for this indicator in order to reduce waittime below what is currently indicated as acceptable.

Management zoning We-support the addition of a management zone 3 but advocate that it be' extended to the western boundary of the old park because: 1. This section of road is the narrowest and least maintained section with poor corner visibility- consistent with the NPS vision of a road that telescopes into a greater ~ sense of wilderness. 2. Vehicles share this section of road with pedestrians and cyclists from area lodges, NPS employee housing facilities, and the Wonder Lake campground. 3. In recent years, vans carrying Kantishna Roadhouse and Denali Backcountry Lodge guests seem to have significantly increased the overall traffic between the end of the road and the. north end of Wonder Lake, not just in the morning and evening in good weather but at all times of day. 4. Extending the zone may provide park management with sufficient authority to better manage vehicles on this section of park road in order to preserve the environmentally sensitive north shore of Wonder Lake and its intake and outflow .. In addition, a uniformed ranger presence there is essential during evenings if nice weather. 5. Access between the south end of Wonder Lake and the end of the road is very narrow with blind corners and two creek crossings. It is recognized by bus drivers as an extremely dangerous segment- to the extent that they proposed special rules of the road for that section during the summer of 2011.

? Photography/Filming Both continue to be a valid use of the park road because of changing technologies that require new images. We support combining photography and

film crews under the same permit system and the use of stricter qualifications. Because of the vagaries of weather and unpredictability of wildlife sightings, these users need to access the road's entirety each day.

Teklanika Campground We do not support a phase-in of a tents only campground . Over time campgrounds have been eliminated at Toklat and the demographics of others has changed because independent vehicles are no longer allowed. If practical, we suggest that Teklanika-bound vehicles travel the road during hours of lower traffic volume.

Other Considerations ? Vehicle arid Pedestrian Safety 7 As part of this plan we propose that the state highway department and the NPS work together with inholders to clarify speed limits and signage between the Wonder Lake Ranger Station and the end of the park road. Appropriate speed reduction and signage is necessary because of turning and entering, pedestrian and cycle use, blind corners, a transit/restroom stop, the space constraints of the Moose Creek Bridge, and7 dust mitigation.

? Correction on Page 168 Project: Description of Action: The 2008 Consolidated Appropriations Act, Division F, Title I, Section 129 This federal statute clarifies the scope and level of visitor. services of an historic operator in Kantishna. The scope and level of visitor services includes, but is not limited to, "guided interpretive trips, including an average of four vehicle trips per day, not to exceed 28 trips per week, into the Old Park."

We welcome the opportunity to discuss our comments and elements of the plan at any time.

Correspondence ID: 250 **Project:** 22494 **Document:** 42309
Received: Oct,18,2011 00:00:00
Correspondence Type: Letter
Correspondence: I have visited the park several times since 1963. The bear and moose population is about the same as is the sheep and wolves. The road seems narrower now and difficult when bus traffic continues during vehicle access. It is Alaska's park and you should keep vehicle access for Alaskans and not let commercial buses take over as they have done already in most parks. I favor Alt "A".

In 1963 there were thousands of caribou in the park which have migrated elsewhere.

Correspondence ID: 251 **Project:** 22494 **Document:** 42309
Received: Oct,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Thank you for the opportunity to comment on the Denali Park Road Draft Vehicle Management Plan (VMP). We commend the National Park Service for its efforts to preserve this special place. The new vision for the management of the road and park access is a big change from the past and, as for more than 50 years, Alaska Geographic is eager to continue our partnership with the National Park Service in carrying out its mission and its vision for the future.

Alaska Geographic plays several roles within Denali National Park and Preserve (DNPP) and many aspects of our operations are directly linked to the park road and transportation services. We fully support the National Park Service plans to improve the services associated with the road and we see our organization's vision and operation fully aligned with those efforts. We hope the comments below will provide the additional perspective of a longstanding and fully supportive partner of the National Park Service in Denali National Park and Preserve.

To assist in the review of our comments, we have organized them in outline form. 1. Murie Science and Learning Center Educational Programs as part of the VMP- The Alternative A section of the VMP makes no mention of the current park programs provided by the Murie Science and Learning Center (MSLC). The most difficult challenge we've had in providing these activities is that most visitors and local staff have not heard of these unique offerings and have the impression that these programs are not open to the public. Goals #3 and #4 of the VMP both aim to improve this common complaint of visitors and the tour industry. Several MSLC offerings were created at the behest of the Park, in part, to offset the high demand for the longer bus tours. The development and success of these programs has a direct impact on the management of the park road and their omission from the current services inventory comprises a missed opportunity to recognize the current and future benefits of programming from the MSLC.

2. MSLC Use of Park Road Defined- Related to the previous comment about MSLC tours, the role of the MSLC educational outreach efforts are not defined in the VMP. On Page 46, there is one reference regarding the MSLC educational programs receiving preferential treatment over commercial tours, yet an opportunity to define this role has been missed. Because education and research efforts of the MSLC are important to Denali, we'd like to see more detail to the MSLC' s use of the park road- details that make it easier for park managers, the concessionaire and other interested parties to understand what the MSLC can offer. The current statements (on page 45-46) in the VMP

leave the MSLC usage of the road vague and subject to wide interpretation by all parties.

37 Bookstores Are Vital to the Park Experience- Alaska Geographic encourages DNPP to recognize that our bookstores (and education programs) are a very important part of the park experience and are instrumental in enhancing the park road experience. Our products can be an excellent avenue for the VMP to satisfY its goals and objective (specifically Goal I, Objective 3 & 4, as well as Goal2, Objective r.) Visitors appreciate products that enhance their experience and help them stay connected with their park, even after they have left. Tour drivers and interpreters also use our products to assist fulfilling their park road guiding role. We feel strongly that it is in the best interest of the Park that the VMP recognize the ways that the bookstores are instrumental to a positive visitor road experience and for fostering lasting stewardship for the park.

47 Reservation System for Park Road Tours- Alaska Geographic encourages DNPP to improve the reservation system of the park tours by noting its importance in the VMP. A new system that allows visitors to easily switch to a more desirable tour without being penalized should be a feature that is common to all alternatives. The current system requires a 2 week notice for any refund - denying any refund for visitors as they arrive at the park. This financial penalty has also made it difficult for many visitors to switch tours such as the unique MSLC programs that may better suit their interests. By specifically identifying the improvements needed in a reservation system, the VMP will provide a future concessions contractor with useful guidelines and satisfy Goals 3 and 4 of the VMP.

57 The Adaptive Management Strategy- The flexibility of the adaptive management system has the potential of making planning for education excursion into the park difficult. We currently need at least an 8-12 months assurance in order to build and offer many of our education programs. We encourage DNPP to consider this when designing the adaptive management details.

6. Value-Added Educational Items on Tours(Economy & Premium)- Alaska Geographic's record for working collaborativelywith NPS in the development of educational products ensures high quality end-products that help the visitor appreciate and interpret the park. These products also provide a lasting memory of their visit to Denali. Our partnership with NPS has a proven track record for developing products that deliver messages consistent with Park interpretive and resource management goals and objectives. With a reasonable lead time, Alaska Geographic can produce products that will provide the orientation, interpretive and safety information that would satisfY almost any need to enhance the visitor experience. Examples are outlined below:

a. Tour Companion Booklets and/or Guidebooks- Custom pictorial and interpretive booklets can be produced for each park tour. These excellent tools allow park managers to have an additional and lasting opportunity to foster park connections with visitors as well as generate more support dollars for the park. Through fun and practical methods, the tour booklets also have potential to attract visitors to visitor centers and bookstores creating greater support for and understanding of the park.

b. Audio Tours Materials- audio files that can be used as electronic docents during the visit and possibly provide visitors with a memorable audio keepsake. Audio tours can be provided via rentable devices or downloaded onto personal devices in distinct sections allowing visitors to pick and chose sections that they want to hear.

c. Multi-Media Tour Material (software apps)- a unique audio/visual treasure chest of Denali's most special features, providing in-depth and up-close explorations of topics and subjects they may not have encountered on their tour. Products may also include an educational activity that could be attractive to families. As a software application, the media can be revised on a regular basis. i. Ex. - Mobile Apps from Balboa Park ii. Ex. - Yellowstone App

NOTE regarding educational products- Feedback from our customers and supporters tells us that hearing of the park education support created by their Alaska Geographic purchases is an attractive selling point. This 'benefits message' is a positive feedback loop that we hope to expand with new tour-specific products.

77 Toklat Eielson and the VMP- The NPS has stated that one of the VMP objectives is to provide more opportunity for visitors to get to the park visitor centers, including the Eielson Visitor Center. Alaska Geographic supports this objective as well, though we are concerned that a shift in bus destinations will limit visitor ability to obtain valuable park education materials from our sales location at Toklat. The Toklat River Rest Stop has proven to be an excellent location for TWf passengers to have an opportunity to find park-specific products. These are park visitors that would otherwise not have this opportunity. If Eidson should attract additional visitors, we recommend that Alaska Geographic return to its former operation at the Eileson location in order to provide this service to all visitors. Visitor Centers are memorable places for park visitors and so often provide unique environments to pique their interest in specific park topics -having an Alaska Geographic bookstore outlet at Eileson is an excellent way to help these visitors enhance their Denali experience with a limited and targeted selection of products that would not completely displace the new Eidson art gallery.

8. Education Programs/Tours available through the WAC & Reservation Call Center - Since 2005 the MSLC, through Alaska Geographic and the Denali Education Center, has been providing short park tours to visitors by exclusive arrangements with tour companies. These short tours were developed at the request of the park to provide an

opportunity for visitors to have a greater depth of understanding of Denali. Each program, Experience Denali excursion, the Family of Wolves Excursion, and the Denali Education Center operated Discover Denali tour provides a science focus to the excursion and all have been developed with and evaluated by the National Park Service. Yet the exclusive nature of the tours has a two-fold negative effect on the MSLC. It has the unintended effect of making the MSLC appear not to be operating for the public; and since the tours aren't available through the Park's reservation system it hampers our ability to run at full tour capacity. The VMP Goals #3 and #4 makes reference to all tour options being easily understood and available to all visitors. Alaska Geographic supports this objective for the benefit of the visitor and the visibility of the MSLC. Making these types of MSLC programs available in the park literature and at the WAC will help meet these objectives and improve the efficiency of our bus capacity.

97 Educational Tours- Through its role at the MSLC, Alaska Geographic provides an excellent avenue for collaborative development of new park tours and services. It has a proven track record of developing compelling and unique hands-on learning opportunities. With assistance from our NPS counterparts and other MSLC partners, we continually evaluate and improve each of our offerings. This helps ensure that we provide excellent and distinct experiences not found elsewhere in the park, yet are comparable with other 'institute-style' programs in parks such as Yellowstone, Glacier, and Yosemite.

10. General Comments about MSLC-Led Education Tours/Excursions a) Using Partners to Accomplish More: We feel that by working with the NPS and the concessionaire the MSLC can play an important role in facilitating new park experiences. As the cooperating association and primary source for unrestricted education funds for the MSLC, Alaska Geographic provides much needed support for underserved audiences and underfunded programs. b) Use of Buses- Small vehicles, i.e. vans, have their place for some programs but use of park buses is an economical approach and reduces the MSLC' s impact on the park road. c) Additional Guide Staff on Buses -The necessity for long premium tour drivers to take breaks at rest stops when these are the only times that many visitors get their feet on the ground provides a missed opportunity for us to help these visitors experience their park. Programs run in partnership with the Concessioner could provide additional staff at these stops- making them truly a 'premium tour'. d) MSLC Staff Provide A More Direct Connection to Park Resource Studies- With its focus on park science and direct relationship with NPS resource specialists, MSLC staff can help enhance tours with current park science and offer emphasis on experiential learning activities. e) NPS Involvement in Program Development- As with every MSLC program, the NPS education team will be involved in program development and evaluation. Attached to this letter is a list of potential programs that could add substantially to the options and opportunities for visitors to enjoy the Park and better understand the significance of its resources.

Potential MSLC7Led Educational Programs

A. Programs Using MSLC Coordinated Buses 1. A Classic Naturalist Tour of Denali-A true natural history exploration of Denali that introduces visitors to the unique biome of the park road corridor. MSLC staff will make connections between the groups observations of the nature environment to areas of science that are unique and important to the preservation and understanding of Denali. Because of the visitor industry emphasis on park road destinations this premium tour would depend on a destination well beyond Savage River. Several opportunities for off-the-bus walking on hardened surfaces would be integrated into the tour (this includes river bars, Mt. Vista, and Savage River). ? Vehicle: 44-52 seat bus ? Location: Sable Pass or East Fork/Polychrome areas. Stop locations may include Mountain Vista, Sable Pass, East Fork, and the Teklanika river bar. ? Uniqueness from Standard Park Tours: ? highest staff-ratio of any tour, 2-3 staff per bus ? hands-on activities at stops and on the bus ? direct link to the MSLC nonprofit benefits and stewardship development ? customized take-home product(s)- booklets, postcards, etc ? food service -full boxed lunch with pre-ordered sandwiches/wraps ? specialized props (e.g. digital spotting scopes/microscopes). ? Duration: 5-7 hours ? Logistical/Business Arrangement: This tour would best be run in partnership with the park concessionaire. The MSLC would provide the guides and the concessionaire provides the bus, driver, and handles reservations. ? Options: This tour could include a stop at the Murie Science and Learning Center for a focused (prop intensive) hands-on activity. Example activities include: a scavenger hunt, welcome to Denali presentation, a series of 3-6 activity stations, and possibly a lunch buffet at the MSLC dining hall. 2. Specialty Tours- Themed-Specific Hiking (Full Bus Option)- A regularly scheduled bus tour offering 44 passengers a very unique and hands-on park tour. With up to four guides, the bus lets visitors off for on-the-ground wilderness experiences at several hardened and dispersed locations for a specific theme-based hike. ? Topics: Birding, park science, geology, wildlife research, etc. ? Location: varied location with an emphasis on hardened surfaces and moderate to easy hiking locations. o Uniqueness from Standard Park Tours: The MSLC would work closely with the interpretive staff to differentiate this fee-based tour from the Discovery Hike program as well coordinate hiking locations. Differences can include the following- full box lunch provided, loaner raingear, walking sticks and backpacks, current science emphasis on topics such as birding, park science, and geology. o Duration: 6-8 hours o Logistical/Business Arrangement: This type of tour is best run in partnership with the park concessionaire. The MSLC could provide the guides and the concessionaire could supply the bus, driver, food service and reservations system. o Options: This tour could include a stop at the Murie Science and Learning Center for a focused (prop intensive) hands-on activity. Example activities include: scavenger hunt in exhibit area, welcome to Denali/Living Laboratory presentation, round-robin of 3-6 activity stations, and possibly a lunch buffet at the MSLC dining hall. B. Programs Using Existing Bus Service 1.Specialty Tours- Themed-Specific Hiking- Many visitors arrive at the park in organized groups seeking a more intimate and individual experience. The MSLC and the VTS provide a perfect scenario for this customizable arrangement. A guided science-themed hike can provide these groups with a unique and intimate experience and also utilizes the VTS system's unused capacity. This type of program can satisfY the desires of the public and the mission of the MSLC at the same time. A similar program is run successfully in Yellowstone. o Topics: Birding, park science, geology, wildlife research, etc. o Location: varied location with an emphasis on hardened surfaces and moderate to easy hiking locations. o Uniqueness from Standard Park Tours: This premium priced program would differentiate itself from the current tours and Discovery Hike program by: o Being a current science-themed program o

Allowing advanced booking for groups o Providing additional services not provided on other tours/programs o The MSLC would work closely with the Interpretive staff to differentiate this fee-based tour from the Discovery Hike program as well coordinate hiking locations. o Additional services can include- a full box lunch, loaner raingear, walking sticks and backpacks o Duration: 6-8 hours o Logistical/Business Arrangement: This type of tour is best run in partnership with the park concessionaire. The MSLC would provide the guides and the concessionaire provides the bus, driver, and handles reservations. o Options: This tour could include a stop at the Murie Science and Learning Center for a focused (prop intensive) hands-on activity. Example activities include: scavenger hunt, welcome to Denali presentation, a series of 3-6 activity stations, and possibly a lunch buffet at the MSLC dining hall.

2. MSLC Field Staff Program: Science Behind the Scenery at Bus Stops- When buses stop at locations such as Teklanika, and Polychrome the park visitors have one of their few opportunities to get off the bus and experience the park more closely, yet this is also the time when driver guides need to take their breaks. Through the MSLC, Alaska Geographic proposes that MSLC guides be stationed at several key locations along the park road in order to enhance the visitor experiences. These 'stations' can include activities such as spotting scopes, two-minute lessons, educational props to handle and short physical activities associated with park resources. Because visitors truly enjoy hearing first-person experiences, optionally, these staff could live remotely in the park (possibly in the unused patrol cabins). To enhance the content of their teachings these remotely-based staff can be charged with activities such as gathering regular data for various resource studies - this will provide a unique first-hand Adolph Murie-style perspective to our visitors. And because these staff would work with various resource specialists the experience would be an excellent learning experience for a young scientists or naturalist. o Topics: Any current park science topic, especially topics relevant to these park road locations and current studies in proximity to the locations. o Uniqueness from Standard Park Tours: Because of the focus on current park science and off-the-bus activities it will be uniquely different from all bus tours. o Options: This type of activity could be developed to enhance the premium tours only but could also be developed in such a way that the service is available to all park visitors.

C. Programs Using MSLC Operated Vans (8-n passengers) 1. Specialty Tours- Small-Group Themed-Specific Hiking -At many other National Parks, Institutes provide custom experiences for small groups that are willing to pay for premium services. In Denali highly trained driver guides could provide a custom park orientation, emphasis on park science, and leave-no-trace hiking experience. The revenues from these tours would subsidize education outreach with under-served audiences. These small group tours provide an excellent and individual opportunity for groups seeking a very unique experience. The program could also assist the Park by providing a special service for some of their VIP group requests. ? Topics: geology, paleontology, birding, wildflowers, landscape change, park science, wildlife research, etc. ? Location: varied turn-around locations, the hiking areas would seek hardened surfaces and moderate-to-easy hiking locations. ? Uniqueness from Standard Park Tours: The program would differentiate itself from the current tours and Discovery Hike program by I) having a focus on current science with emphasis on topics such as birding, park science, and geology. 2) allowing advanced booking, 3) providing additional services not provided on other tours/programs and 4) being at a premium price. The MSLC would work closely with the interpretive staff to differentiate this fee-based tour from the Discovery Hike program as well coordinate hiking locations. Additional services can include the following: a full box lunch, loaned raingear, walking sticks and backpacks. ? Duration: 6-8 hours ? Logistical/Business Arrangement: This type of tour is best run in limited partnership with the park concessionaire. The MSLC would provide the guides and vehicles and the concessionaire handles the reservations. ? Options: This tour could include a stop at the Murie Science and Learning Center for a focused (prop intensive) hands-on activity. Example activities include: scavenger hunts, a welcome to Denali presentation, a series of 3-6 activity stations, and possibly a lunch buffet at the MSLC dining hall.

NOTE: It is economically challenging to make a small vehicle tour viable. A premium price will be necessary to cover immediate costs and consistent enrollment will be needed in order to have season-long sustainability. Sustainability would depend upon cooperative marketing (NPS Reservation and WAC) and through arrangements with small tour companies.

Correspondence ID: 252 **Project:** 22494 **Document:** 42309
Received: Sep,30,2011 00:00:00
Correspondence Type: Letter
Correspondence: Yes, I'm a ProPho. Yes, I've had the privilege of a Road Permit for a quarter century. And yes my view is biased, but more for reasons not personal. Earlier this year Jeff Schultz, Alaska Stock, e-mailed me the complete package of road proposals under consideration. Friend, Tom Walker, and I spent some ProPho time together earlier this month. It does appear the drumbeat to rid Denali of professional image-makers is gaining strength. Add Washington's inability to control a government gone wild and America has a problem- the National Park system has a problem. I understand money talks. Photographers, especially those full time natural history professionals, have an income crisis that has more to do with the reality of a fast changing world. My sales reports show plenty of published photos (probably the required 24 a year) monthly, but the money received has dropped off a full 90 percent. Any argument that we come to Denali to make money doesn't fly- it's become an expensive labor of love. No violins or sympathy. So what's my point? There's another side to the debate. I continue to make the Denali experience available to literally thousands who will never have an opportunity to travel North. I joyfully volunteer my time and effort. These are those other Americans who deserve a visual celebration of what has become not just another National Park, but a true International Treasure. Their tax dollars pay for it, they deserve to see it. Their deep appreciation is my reward. Your vendor force will be well represented in upcoming deliberations. How do they squeeze one more bus on the road? Enclosed is a 2012 Calendar of Sept. 2011 images. I understand you will soon retire. Thank you for your dedicated service, with one exception ... I don't like NPS toilet paper.

Correspondence ID: 253 **Project:** 22494 **Document:** 42309
Received: Oct,09,2011 00:00:00
Correspondence Type: Letter
Correspondence: I wish to speak a few words for wilderness. I wish to allow wilderness to grow and prosper in the ways wilderness has done for millennia. I wish to show you wilderness. And I hope that when you see it, when you see a caribou grazing on lichen, when you see a raven perching on a spruce bough, when you see a grizzly bear digging for Eskimo potato roots, when you see glaciers spilling into tundra plains, and when you see the tundra encroaching upon the road, when you see wilderness, you recognize it for what it is. That might seem like a simple request. That might seem obvious, but you should know, the value of wilderness can be overlooked these days, even at Denali National Park and Preserve, _a six million acre federally controlled wilderness in the Interior of Alaska. When imagining the size of Denali National Park, image the state of Massachusetts. The two are nearly equivalent in size. Knowing the size of the place is important. It helps us put things in perspective. It helps us frame things in our mind.

To know the acres, people marked boundaries and measured those boundaries. Sometimes, it is good to measure things. Measurements help us understand physical characteristics; however, you should know, we can't always trust measurements and numbers. You remember the analogy of the island, right?

Let's say you have an island. Waves lap onto the beach. Sometimes tides crash waves across the sand. Other days, perhaps, the halcyon season is upon us and the waves are calm. Let's say you want to measure the beach so you gouge a nice line in the sand to mark your starting point. Then you begin flipping the yardstick end over end, measuring the perimeter of the island. Fortunately the waves are mild. The process is simple. When you return to your line in the sand, you have a number. This number is important to you and everyone. You see, we like numbers. We recognize numbers. In first grade we begin training to manipulate them with addition and subtraction. Numbers are familiar to us.

Let's say, however, you didn't like the number you found with the yardstick. Let's say you decide to measure again because you didn't think the yardstick was accurate enough. This time you use a 12" ruler. The halcyon days are still upon us, so measuring is relatively simple, just a matter of flipping the ruler end over end. Problematically, compared to the yardstick and the uneven line created by the calm water lapping at the beach, the ruler makes a cumbersome zigzag pattern as it measures the beach. As you might have guessed, when your measurement of the island is complete, due to the serpentine movement of the ruler, your measurement is much different, much larger than your yardstick measurement. Here lies a problem. By re-measuring the island, it seems you are further from knowing it's actual perimeter. For the sake of accuracy. For the sake of science and numbers, oh how we like numbers, you decide the only way to know the perimeter of the island is to measure again. This time, third time's a charm right, the first two were approaching the truth, this one has to be accurate, this time you measure with a protractor. The protractor should be the perfect tool for this kind of work, a flat side six inches long and little inch marks on the arch to help measure the lapping of the waves. This measurement will be perfect. Right?

Scientifically, the methods were solid so third measurement is perfect. It's a much different number than the two previous, but it is an accurate number. We can have a lot of pride in the hard work used to identify that number; however, the new number is problematic. You would think, with the finer measurement, we would better understand the size of the island. Secretary Salazar, if someone asks you the size of the island, which number is the accurate one? Which device measured the most accurate perimeter?

I hope you see the greater problem often produced by measurement, by numbers. Often times, when you look to the minute to understand the whole, you forget you already knew the size of the island, you actually lose track of the original concept. This point is important, so I'm going to rephrase it: sometimes focusing on numbers and measurements allows a person to shirk the original concept.

Secretary of Interior Salazar, I think this is a good time to remind you of the original concept. When the land was first established as a park in 1917 it was 2 million acres in size and called McKinley National Park. The name change and increase in size occurred in 1980 when ANILCA was signed. The purpose of Denali and the then called McKinley Park was to showcase wilderness.

Decades ago, there was an attempt to authorize a change in infrastructure of McKinley Park and other parks throughout the country. You are probably familiar with the nationwide parks project called Mission 66. While Mission 66 was well suited for most parks in the country, people familiar with McKinley Park opposed it. Adolph Murie, a scientist and conservationist who published the first scientific book on wolves in the predator prey cycle and his brother Olaus, a director of the Wilderness society, both opposed Mission 66. Adolph's reasons were simple enough. In a letter to the then Superintendent he wrote, "Because McKinley is a wilderness within a vast northern wilderness, the ill effect of any intrusion will here be proportionately greater; and any 'dressing up' will be more incongruous, will clash more with the wilderness spirit, than would be true in any of our areas in the States. And since wilderness is recognized as one of the foremost values in the Park, it must be given special consideration in order to maintain its purity."

National Parks Magazine, a periodical published by the National Parks Conservation Association, published an article by Olaus. Olaus foresaw Mission 66's capacity to

reduce wilderness. In the article "Mount McKinley: Wilderness Park of the North Country," he describes the wilderness spirit of the park, then writes, "The other side of the picture of Mount McKinley National Park is that of the prevailing enthusiasm for what the bulldozer can do; the speedway-building craze that has come over this continent has begun to penetrate Alaska also. "

The important theme you should be gathering from these quotes is rather simple; Denali is a symbol of wilderness. Another theme, you might be noticing this in the letter, most certainly it is a common theme around Denali these days, we have to protect the park from Park Service. All of our human challenges to improve wilderness are ineffective. We must allow wilderness to be wilderness.

This task seems simple. In 2001 Superintendant of Denali National Park and Preserve Stephen Martin was awarded the Stephen P. Mather Award by the National Parks Conservation Association. The NPCA awarded Martin the award "for management decisions based on preserving Denali's essence as a wilderness wildlife park." Wilderness is relatively easy to manage. Martin kept his hands out of it.

Since Superintendent Martin retired, Superintendent Paul Anderson has had difficulty keeping his hands out of the wilderness or his shovel might be a more appropriate image. Anderson has spent tens of millions of dollars on construction. He built a new Visitors Center. He demolished and constructed a second Visitors Center deep within the park. He's built new trails and rest stops. He's removed rest stops and had them rebuilt again years after realizing their importance. He enjoys the vibration of the jackhammer. He likes the way the engines of bulldozers rumbles in his chest. It is difficult to put his action in perspective and still remain polite. Although Superintendent Paul Anderson is in charge of maintaining a wilderness, Anderson is in favor of urban sprawl.

A demolished and reconstructed visitor's facility at mile 66 of the road is a good example of Anderson's hyperbole. The park asks visitors to practice leave-no-trace backpacking, yet they spend millions on a building only open a few months of the year and only open visited by a moderate percentage of park visitors. If the park planners were to practice what the Park preaches to visitors, a tent, a simple structure easy to remove each winter, would have leave no trace and serve as a functional visitors facility.

While that visitor facility was being constructed, a tent served as a temporary stopping point. Now, Superintendent Anderson has been successful at making that tent controversial. Written into the construction plan the temporary tent was supposed to be temporary, but Anderson, now, will not allow its removal. It remains in place, adding to the sprawl.

Secretary Salazar, I think you should know the halcyon days have passed. There is no calm on the current issue. I am angry and distrustful of Anderson, and I am comfortable with expressing that since I no longer work in Denali; instead, I work in education within the state. My credentials aren't important here. What's important is that I'm still in close contact with park employees and concession contract employees (bus drivers), and I'm still in intimate contact with the place. I know of no person who is happy with Anderson's reign. People say we have to stand against him. Retirees say they have never see so much construction. Returning visitors try to understand what happened to the park they enjoyed. Anderson builds. He seems unstoppable. Comment periods are a joke, for he doesn't listen. He has an agenda unsupported in wilderness values.

To put things in perspective, here are some figures for the Recovery Act's distribution of monies from February 17, 209 to June 30th, 2011. Yellowstone, zip code 82190, received $9,193,570. Yosemite, zip code 95389, received $6,18,980. Grand Canyon, zip code 86046, received $7,118,820. While those parks receive millions more visitors per year than Denali, Denali received $14,007,668 in just the two years of Recovery Act funding. These excess funds do not include monies for recent Visitors Center demolition and construction plus numerous other contracts.

Currently, the park is seeking comments, like this letter, on a new Vehicle Management Plan. Secretary Salazar, this management plan is perhaps the most important management document for Denali in decades. There is only one road in Denali. It dead-ends ninety-two miles into its middle in an old mining district called Kantishna. Sixty-six miles in, at Eielson, a recently reconstructed multi-million-dollar Visitors Center offers a destination for some of the bus travelers. All the travelers are by bus. You see, bus transportation is the only method of travel past mile fifteen of the park road. Denali is a wilderness park with basic infrastructure. Employees and visitors like it that way.

Restricted travel on the Park Road is a good thing. The road is better suited to occasional buses rather than mass vehicular traffic. The wildlife utilizes the space between buses to wander back and forth across the road. And, the bus system allows two very different trips into the park. One branch of the system allows hiker /backpacker no frills travel. The other branch offers certified tour guides. This bus system was created in 1972, when higher numbers of tourists began visiting Denali. Since the inception of

the bus system, it has been tweaked into the system that it is today and a cap at 10,512 buses per summer are allowed to travel the park road.

These details I'm sharing may give you tangible characteristics of the bus system, yet these details don't tell you the value of the bus system. Here's the importance: the current bus system permits a wilderness experience with little impact on the environment.

Changes to this system will create a greater impact on the wilderness. For example a rise in vehicular traffic will decrease the amount of wildlife spotted along the road. While the park scientists have been gathering numbers, creating graphs, and tables for a few years, some of the employees who have been driving buses on the road for thirty years describe the lesser wildlife today than years ago. They know this because they witnessed the change, the increase in traffic to the 10, 512 number, the increase in construction equipment, and the decreased in the number of wildlife. It's a simple observation. Like the person who recognizes the snow arriving later and later and, perhaps, accumulating in less quantity than years before.

We can trust our observations. If we had to trust numbers, we could. One bus driver has been recording wildlife sightings for decades. He has the data to prove his observations, yet Anderson isn't interested in these observations.

Park Service devised three potential management plans: A, B, and C. A is close to the existing. B and C are quite different, and I argue they are barely worth mentioning since, I believe, those two plans lack morals, wilderness ethics, and contradict the Park's own management goals.

To help devise these new plans, the park categorized the wilderness into different wilderness zones and subzones. Secretary Salazar that last sentence should make you think about re-measuring the island. Our job as caretakers of Denali is to preserve the wilderness and teach a wilderness ethic to visitors. By evaluating and quantifying wilderness areas along the park road, by measuring the wilderness, park planners are shirking the original concept. This is unsalutory behavior.

Secretary Salazar, think for a moment, what brings visitor to Denali Park? What is draw of the place?

I suspect your mind will find images of mountains, like Denali. You might imagine glaciers. Perhaps it is a beautiful display of tundra in fall colors. I know at some point your imagination turns to wild animals for a moment. I know this because I drove a tour bus in Denali for years. Visitors want to see wildlife. I also know bus drivers want to see wildlife. Seeing a wild animal inhabiting its natural environment is a thrill, even when repeated hundreds of times.

Spotting wildlife is important to visitors traveling on buses, and problematically, wildlife vacate the road corridor as traffic increases. Since there is already a 10,512 cap on the number of buses allowed to travel the park road, you would think, if the park is dedicated to protecting the wilderness and wildlife of the place, the cap would carry over into the new Vehicle Management Plan. You would think the planners would safe guard against turning the Park Road into a bus traffic jam. You would think planners would consider the original concept.

I have driven tours to the dead-end of the 92 mile Park Road, and I've driven short tours to mile 17. Sometimes the subject of traffic would come-up on a trip. I would mention the road capacity. Visitors, on both the long and short tour, were astonished the road had such a high capacity each summer. There desire was not to increase traffic. In fact, the opposite occurred. They thought the traffic could be limited even more. There's something special about being in Denali; just being there arises strong desires for protection within visitors. Therein lies the rub Secretary Salazar. In the new Vehicle Management Plan there is no road traffic capacity. This is troubling for three reasons. First, the increased traffic has the potential to reduce wildlife sightings. Second, the increased traffic will create traffic jams. Just because a traffic jam occurs in a national park doesn't make it more fun than a traffic jam in Denver. Third, only one group has the potential to benefit from the increased bus traffic.

While employees, local residents, and visitors desire the road capacity to stay the same or decrease, park planners have done away with the road capacity all together. This action, obviously, is linked to the benefit of one group. This refusal to establish an equal to or lessened road capacity will only help the pocket books of the concessionaire. In addition to being an apparent Park Service business decision, the absence of a road capacity from the Vehicle Management Plan is troubling for two reasons. First, buses aren't near capacity now. With plenty of room on the existing buses, there is no reason to add more buses. Second, according to the Vehicle Management Plan, once the plan is put in place, Superintendant Paul Anderson has all power to change or modify the plan. Secretary Salazar, the best interest of the wilderness of Denali is not placing more power in the hands of Superintendant Paul Anderson. His track record of destroying the wilderness, his lack of wilderness ethic, and his failure to listen to the desires of park locals are three of many reasons to step in and urge Superintendant Anderson to make decisions in the interest of wilderness conservation.

Years ago, when commenting on this plan began, those of us involved in the park asked for a couple things. We want a road capacity of 10,512 or less. And, we want to

keep what we have now and tweak it some more, as we have done since the inception of the bus service. By doing just that, the park is incorporating the first goal of the new management plan, "Protect the exceptional condition of the park's resources and values through informed, proactive, and transparent management." As it is now, the plans neither protect nor are they transparent.

Secretary Salazar I need your help in convincing Superintendant Anderson of the urgency of our wilderness values. Anderson is not listening to us, and as I mentioned earlier, they days of calm have passes. We are angry. We are commenting. At this point, we need to protect the park from Park Service.

Here are my suggestions for the new plan. First, Anderson needs to be thanked for all the hard work he and his team put into creating this new plan. Second, plans B and C should be described as good ideas, perhaps phrases like thinking outside the box or exploring ideas could be used to describe their nature. Nonetheless, they should be dismissed as good tries yet unacceptable tries.

Plan A has opportunity. As it is now, it fails the first goal of the plan, it seems dedicated to business, and it grants complete power to a person dedicated to urban sprawl. These problems with plan A must be addressed before implementation. My suggestions include adding the 10,512 capacity, sticking to the current plan as much as possible and just tweaking as necessary, and removing the sole power of modification from Superintendent Anderson.

Many of my friends, coworkers, and concerned citizens are writing very good comments about the new vehicle management plan. If Superintendent Anderson remains unwilling to consider comments of concerned citizens, if Superintendent Anderson remains unwilling to establish a road capacity at or less than 10,512 vehicles, if Superintendent Anderson remains rooting his decisions on the best interest of business or exploitation rather than the best interest of the wilderness, I ask you, Secretary Salazar, then please ask Superintendent Anderson to resign from his position. He does not deserve the privilege to serve as presiding steward of Denali Park or any national park. Denali is a special place. Since it is a wilderness within the larger Alaskan wilderness, we have a substantial obligation to showcase how the federal government can preserve wilderness. A Superintendent with a wilderness ethic is vital to the place, not a leader with a disposition towards sprawl. Becoming obsessed with measurement and numbers can allow a person to neglect original goals, but one number important to the goal of wilderness preservation in Denali is 10,512.

I hope you visit Denali some day. When you do, I hope you don't become stuck in bus traffic jams. I do hope you see wildlife. Perhaps a caribou will run as caribou do, for they always seem to be going somewhere. Perhaps a long-tailed jaeger will dive for voles. Perhaps you will see a grizzly slumbering in the tundra. And I hope you recognize these things as worthy of preserving for future generations.

I leave you with a quote from Edward Abby. I'm sure you are familiar with it. Sometimes, I think, it's good to return to it. Abbey often serves as a good reminder of our values towards our wild places and our values towards sprawl, "Growth for the sake of growth is the ideology of the cancer cell."

Correspondence ID: 254 **Project:** 22494 **Document:** 42309
Received: Oct,28,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I am a year-round resident and land owner in the Stampede area, have worked as an NPS employee in Denali from 2004-2009 and am a member of the Denali Citizen's Council. My concerns about the park road management plan stem from my deep attachment to Denali's backcountry and my hope that its wildlife character be strongly protected while retaining affordable access for the average visitor. I support Alternative A, No Action, not because I think the status quo is perfect'indeed, I do not think it is, and I support the NPS's desire to create a capacity that more accurately reflects actual park use, and incorporates adaptive management strategies. However, both Alternative B & C fail to adequately address my concerns about consistent management for wilderness character, and affordable access. My two most specific concerns about the alternatives are as follows:

1. Neither B nor C provides the "safety net" of a firm capacity limit for the park road. Although adaptive management is appealing in that it clearly links capacity to data and is less random than the arbitrary 10,512, I would like to see adaptive management used over a set period to generate the data necessary to determine a new, appropriate capacity addressing the traffic that falls through the cracks in the current plan, (ie, photographers, NPS vehicles). Because of the budget increase required to fund, interpret and enforce annual monitoring, the proposed alternatives feel cumbersome, unlikely to respond quickly to oversight and overreach, and too open to the vagaries of politics which could change both the tone of park leadership and the budget available for monitoring. I do not support a plan that has no numerical "safety net," and thus requires that the public trust the NPS's good intentions. I have seen a general erosion of commitment to wilderness management over the last ten years, which worries me, and for this reason I will only support a plan with firm capacity limits that are informed by adaptive management strategies. 2. Neither B nor C unequivocally supports an affordable transit option for independent travelers on a budget. Both options feel too heavily weighted towards the interests of industrial tourism. The current transportation option is already financially onerous for many Alaskans. After I quit working for the park and lost my free bus ride privileges, my travel in the park has been severely curtailed

because of the expense of bus travel, particularly when bringing family members and visitors. This is a shame. Park access must remain feasible and travel prioritized for all visitors, not just those on tours. In conclusion, I support the park's desire to update the road capacity to a level that is based on adaptive management data, but I cannot support either of the two options without serious changes. I support the critiques and recommendations to the plan as articulated by DCC and if I'm hearing my community right, many of us in the region feel similarly. If the park listens to the comments along these lines and makes a good faith effort to draft an alternative addressing these concerns, I will definitely reconsider my support.

Correspondence ID: 255 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I am writing to support ALternative A (No Action) for this plan. The funding for any of the other alternatives should go to exisiting defered maintenance projects.

Correspondence ID: 256 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I am satisfied with the current plan nothing should change

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Correspondence ID: 257 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Thank you for the opportunity to comment on the Denali Park Road Draft Vehicle Management Plan & Draft Environmental Impact Statement for Denali National Park & Preserve.

Allen Smith has over thirty years of experience with Denali National Park & Preserve and its issues beginning with the passage of the Alaska National Interest Lands Conservation Act (ANILCA) to the present. Now a freelance conservation writer and consultant on public land issues, he previously served as Executive Officer of the Land & Natural Resources Division in the U.S. Dept of Justice 1979 to 1982 and as Alaska Regional Director and Senior Policy Analyst for The Wilderness Society from 1989 to 2004 and has commented extensively on previous Denali Park Road plans. His first of many visits to Denali NP&P was in 1983 and his most recent visit was in 2009.

William Perhach has over thirty years of experience with Denali National Park & Preserve transportation systems and conservation issues serving as ARA Outdoor World Tour and Shuttle Driver 1977 through 1981, Transportation Manager ARA Outdoor World 1987 and 1988, Camp Denali/North Face Lodge Driver/Guide 1990 through 1999, Member of USDI 1994 Denali Task Force, and Legal Assistant to the General Counsel at the White House Council on Environmental Quality (CEQ) 2000 through 2006. He most recently spent the summer of 2011 in Denali NP&P. SUMMARY STATEMENT:

From our collective and continuing professional and recreational experiences in Denali National Park & Preserve, we have witnessed huge changes in traffic levels, increased extent of staff and visitor facilities in the Park Road corridor, Park Road infrastructure condition and widening and the challenges to maintain it, and increased size and weight of transportation equipment used on the Park Road. The need for a sound Denali Park Road Plan is obvious. However, we do not believe that the three Alternatives (A, B, and C) outlined in the Draft Vehicle Management Plan and evaluated in the Draft Environmental Impact Statement represent a complete and adequate consideration of the full range of management alternatives and cumulative effects analysis required by the National Environmental Policy Act (NEPA), ANILCA, the Wilderness Act, and National Park Service Management Policy to protect the purposes and resources of Denali and its Wilderness Area to achieve such a plan.

Denali is a world-renowned wilderness park and should be managed as such. It is our view that there is already too much traffic on the Denali Park Road and that the Wilderness Area resources and wildlife of the Park are currently being negatively impacted by it. The primary consideration should be to first recognize the wild natural setting of the road as a very narrow right-of-way through a designated Wilderness Area, an area to be protected under the standards of the Wilderness Act, an issue which has not yet been adequately addressed in this plan or any other plan. The impacts from actions in this narrow road corridor spill over into the Wilderness Area, yet the emphasis to date has been to ignore that fact in favor of decisions to get more and more people into the park through upgraded road width, increased corridor infrastructure, and increased bus size and capacity, and the construction of more visitor facilities.

ANALYSIS OF DRAFT PLAN AND DEIS:

Purpose and Need: The Purpose and Need for this action as stated in the DEIS leading to the three Alternatives displayed does not seem valid in face of several aspects.

First, it presumes to continue increasing bus and passenger traffic into the park along the Park Road in the face of evidence that the current traffic level already has adverse effects on the wilderness character of the adjacent Denali Wilderness Area.

Second, the demand curve for use of the Park Road appears to be fairly flat, but in any case should not be used to justify further exceeding limits that will cause even more adverse impacts on wildlife and habitat in the adjacent Denali Wilderness Area.

Third, a more appropriate statement of Purpose and Need would be to reduce the existing adverse effects on wilderness character from Park Road impacts on the Denali Wilderness Area as required by statute in the Wilderness Act.

Fourth, while the 10,512 vehicle limit established for the Park Road in regulation may seem arbitrary, there is evidence that even it is too high for the traffic it allows on the road and should in fact be reduced to mitigate and correct adverse impacts on wildlife and the Denali Wilderness Area.

A more appropriate Purpose and Need would be to develop Alternatives (not now displayed in the Plan and DEIS) to reduce the existing adverse impacts on the Denali Wilderness Area and its wildlife and wildlife habitat while maintaining a unique wildlife and wilderness visitor experience.

Transportation System and Traffic:

The 10,512 vehicle limit set by the NPS for the Denali Park Road was established in the 1986 General Management Plan for Denali in response to an increasing visitor demand for transit out the Park Road past the Savage River Check Station, that demand having already nearly doubled in the prior decade (1976 to 1986) raising serious concerns about impacts on park resources that led to that 10,512 vehicle limit. The number of passengers in 1986 was much less then than it has grown to be today and the transportation technology used then was lighter and had less impact on the road and adjacent area than today's larger, heavier buses. From 1986 to 2008, there has been an approximately 125% increase in bus passengers out the Park Road past Savage River.

National Park Service has held to the 10,512 vehicle limit in that period by accommodating the increased visitation through nearly doubling the size and passenger capacity of the buses used on the road with the commensurate increased weight and adverse impacts of those buses also doubling as well. The level of staff and the footprint of visitor facilities along the Denali Park Road corridor has also significantly increased in that period at Teklanika, Toklat, Eilson, and Wonder Lake. Overall there continues to be more and more facility stuffed into the road corridor to accommodate more and more staff and visitors. The growing footprint at Toklat alone could well be the next major trouble spot for negative impacts on the park, its Wilderness Area, and the water quality of the Toklat River. There do not appear to be any limits or restraint displayed in Alternatives A, B, & C of the Denali Park Road Draft Vehicle Management Plan, except the 10,512 vehicle limit in Alternative A.

NPS states on page v in the Executive Summary of this DEIS that: "The maximum annual and daily vehicle capacity for the Park Road will be published each year as part of the Superintendent's Compendium, subject to public notice and comment. This will allow the Superintendent to set the next year's capacity based on monitoring, research, and lessons learned in the prior years' implementation. The National Park Service would initiate the necessary steps to promulgate a modification of CFR 13.932 - 13.934 that would give the Superintendent discretion to set the maximum capacity of the road to maintain the vehicle management system indicators and standards." Thus, NPS intends to abandon the 10,512 GMP vehicle cap and adjust the limits each year in an obscure and discretionary regulatory process that few in the public follow or know how to follow.

DEIS Table 7. Total Seasonal Recreation Visitors to the Denali Park Road on page 93 shows what the last several years of park visitation have been:

2005 2006 2007 2008 2009 2010 Total Seasonal Recreation Visitors Using Park Road 365,699 374,414 404,812 382,589 323,754 327,967

From these numbers and historical records it appears that park visitation has leveled off. While the recent economic downturn may well have helped to flatten out visitation numbers, it does not follow that future trends of increased visitation should be accommodated if increased demand returns. The existing impacts under Alternative A should be sufficient reason alone to hold the line on the number of buses while working out how to reduce those existing impacts.

Examination of the proposed Alternatives reveals some troubling conclusions. APPENDIX D: Traffic Model Results shows how Alternatives B & C would abolish the 10,512 cap and push total vehicle use on the Park Road higher (DEIS page 308). Alternatives B & C would both break the current 10,512 cap shown under Alternative A because the Other Vehicles do not go away, which the NPS admits in the DEIS, as noted above, that it plans to abolish its current cap of 10,512 vehicles and establish a new caps annually.

Alternative A Alternative B Alternative C Total Buses 8,586 9,466 10,243 # Increase 880 1,657 % Increase 10.2 % 19.3 %

Other Vehicles 1,926 1,046 269 Current Cap 10,512 10,512 10,512

There appears to be an error in the percentage increase in buses under Alternative C; it should be 19.3%, not the 8.7% as displayed in the DEIS.

Passenger seat capacity on DEIS page 309 also raises an interesting question, particularly when compared to the increase in bus numbers.

Alternative A Alternative B Alternative C Seat Capacity 368,263 407,686 382,292 # Increase 39,423 14,029 % Increase 10.7% 3.8%

What this shows is that Alternative B projects a10.2% increase in bus numbers with a commensurate 10.7% increase in seat capacity, but Alternative C projects a 19.3% increase in bus numbers with only a 3.8% increase in seat capacity.

This picture becomes even more difficult to understand and justify when the costs of Alternatives B & C are examined as well. APPENDIX B: Estimated Costs for Vehicle Management Plan Alternatives shows the following total 20 year costs and average annual costs for the Alternatives.

Alternative A Alternative B Alternative C Total Costs $83,180,000 to $101,410,200 to $100,169,200 to $84,100,000 $103,762,700 $102,521,700

Average $4,159,000 to $5,070,510 to $5,008,460 to Annual Costs $4,205,000 $5,188,135 $5,126,085

It is questionable that in these economic times of federal budgetary restraint that any national park could secure this kind of increased funding for increased infrastructure services when in fact the demand curve for those services is not there. This is beside the fact that both Alternative B & C add measurably to the footprint of impacts on wildlife and wildlife habitat and the adverse effects on the Denali Wilderness Area.

Finally, the Proposed Changes to Denali Park Road Management Zones proposed by Alternatives B & C support significantly increased visitor use via bus traffic out the Park Road to Wonder Lake and Kantishna past current existing turnaround points at Primrose, Toklat, and Stony and we strongly object to them, particularly if that higher use level were to become the standard that is locked into any pending designation of the Denali Park Road on the National Historic Register. We urge NPS to leave the current management zone structure alone, particularly since there is not yet any supportable analysis of ecological limits to Park Road use displayed in this planning process.

Wildlife:

All of the Alternatives (A, B, & C) have or would have impacts on wildlife and wildlife habitat. Based on NPS wildlife sighting data reported from 2007 and 2008, the probabilities of seeing one of the big five "charismatic mega-fauna" (Dall sheep, caribou, grizzly bear, gray wolf, and moose) increase for all five species between the park entrance and Kantishna (See DEIS Table 12 pg 111, Table 14 pg 115, Table 10 pg 120, Table 15 pg 127 & Table 16 pg 132). However, the reader is provided no evaluation in the DEIS as to whether these probabilities have changed or declined over time as traffic on the Park Road has significantly increased. The DEIS analysis is deficient on this.

Dall sheep ? NPS monitoring of 20 Dall sheep with GPS radio collars in 2007 " showed evidence that the sheep generally move farther away from the road as traffic volume increases. Thus, road use affects when and where the Dall sheep are able to forage, and in turn could limit the area and locations of available sheep habitat during certain times of year (particularly in spring when the sheep are more dependent on vegetation at lower elevations) (Putera and Keay 1998). Given these effects, under the two action alternatives for this plan, the park would manage traffic on the road to allow for gaps for the sheep to approach or cross the road, unimpeded by vehicle presence. DEIS,

page 110. Why then does NPS not now manage "to allow gaps" to minimize impacts on sheep?

Caribou ? The DEIS has no evaluation of road impacts on caribou and is deficient.

Grizzly Bears ? "Recent NPS bear monitoring studies at Denali have revealed a grizzly bear density of roughly 27 bears per 1,000 square kilometers (70 bears per 1,000 square mile) on the north side of the Alaska Range. This translates to 300-350 grizzly bears in the park to the north of the range. This population density is considerably lower than the density on the south side, presumably due to higher salmon availability on the south side (NPS 2009a)." DEIS page 120. Long-term Denali grizzly bear population numbers and trends are totally absent from the DEIS and this source of population information given is based on old extrapolated data and is not current. The DEIS is deficient on this point. "Overall, the Denali bear study findings corroborate previous research efforts that concluded that some individual bears may react negatively to vehicular traffic at specific places or times even though the bears generally are not altering the timing of their activities to avoid human disturbances along the road (Mace et al. 2009)." DEIS pages 121 ? 122. The DEIS does not provide any long-term data on Denali grizzly bear road behavior to support whether or not there have been changes in bear behavior as the result of increased bus traffic over the last thirty years and the DEIS is deficient in its analysis.

Gray Wolf ? The DEIS has no evaluation of road impacts on gray wolves and is deficient.

Moose ? The DEIS has no evaluation of road impacts on moose and is deficient.

Cumulative Impacts ? "Several past, present, and reasonably foreseeable future projects and actions in the vicinity of the Park Road corridor have had and will have notable effects on the wildlife and wildlife habitat in the area." DEIS at Pages 191, 196, & 201. While NPS repeatedly points to "potential impacts" to wildlife from each of the three Alternatives (A, B, & C) it does not deal with reducing those impacts but instead only suggests how it will monitor and try to mitigate those impacts. There is no long-term tracking data of Denali wildlife populations for Dall sheep, caribou, grizzly bear, gray wolf, moose and other wildlife provided in the DEIS as a basis of evaluating impacts. This is a deficiency in the DEIS.

Wilderness: Adverse impacts on wildlife and wildlife habitat in wilderness causes adverse effects on wilderness character. What happens in the Denali Park Road corridor does not stay in the road corridor; it spills over into the adjacent Denali Wilderness Area. The acknowledgement by NPS of the impacts on wildlife and wildlife habitat is also an acknowledgement of adverse effects on wilderness character in the Denali Wilderness Area. In the Draft Plan and DEIS, NPS outlines with deliberate specificity on page 138 in Chapter 3, Affected Environment that: "The designated wilderness boundary along the Park Road corridor begins 150 feet from the centerline of the Park Road (measured perpendicularly from the center line on both sides of the road). The boundary also begins 150 feet from any existing borrow pits and waysides; lands east of the railroad right-of-way are excluded from designation (NPS 1986). Typically, a 300 foot buffer separates the wilderness boundary from any park facility or development."

NPS later admits in Chapter 4, Environmental Consequences, that wilderness character along the Park Road corridor is adversely impacted by the current vehicle management system in Alternative A, No Action, and would be further adversely impacted by both Alternative B, Optimized Access, and Alternative C, Maximizing Visitor Opportunities as follows: Alternative A, page 204 ? "Adverse effects would continue to result from individual vehicles, queues of multiple vehicles, off-bus human activity at transportation hubs along the full length of the road and facility maintenance." Alternative B, page 208 ? "This vehicle traffic and human activity would continue to have a variety of notable adverse effects on wilderness character along the road corridor similar to the effects described in the Alternative A analysis above. In addition to these continuing effects of vehicle and human traffic on the Park Road, some changes to wilderness impacts could be expected." Alternative C, page 215 ? "These increases in vehicle traffic levels that could accompany Alternative C have the potential to increase adverse effects to wilderness character during certain periods of day and season."

Cumulative Impacts ? "Several past, present, and reasonably foreseeable future projects and actions in the vicinity of the Park Road corridor and throughout the park have had and will have notable effects on the wilderness character in the area." DEIS at Pages 207, 214, & 220. While NPS repeatedly points to the potential to "continue or increase adverse effects on wilderness character" from each of the three Alternatives (A, B, & C) it does not deal with reducing those adverse effects but instead only suggests how it will monitor and try to mitigate those adverse effects at the same it tries to justify new Alternatives that will cause increased impacts. NPS does not reconcile its duties under the Wilderness Act and ANILCA to prevent adverse impacts to the Wilderness Area bisected by the Denali Park Road with its current and proposed management actions in the Draft Plan and DEIS and the analysis is consequently deficient.

National Environmental Policy Act:

National Park Service was required by ANILCA Sec. 1301, Management Plans, to prepare General Management Plans (GMP's) in Alaska for all of its Conservation System

Units including Denali NP&P, and NPS originally completed all of them as Environmental Assessments (EA's), not as full Environmental Impact Statements (EIS's). At the same time, the Wilderness Suitability Reviews required by ANILCA sec. 1317 were completed with full EIS's. Alaska Regional Office of NPS later determined that, absent an EIS on the GMP, significant step-down planning at Denali NP&P required full EIS's and a series of such EIS planning exercises has occurred for the Southside Plan, the Back Country Management Plan, and now another Park Road Vehicle Management Plan.

All of these Denali EIS's were treated by NPS as amendments to the GMP, but the GMP itself has never had a full EIS. On page 315 in the References section of this Draft Plan and DEIS an entry appears at: National Park Service (NPS) 2008 Denali National Park and Preserve Consolidated General Management Plan, for which there has never yet been a full EIS.

The cumulative effects of the relationships of all of these seemingly separated management plans and actions at Denali NP&P have never been evaluated and a myriad of decisions rolls on as displayed by the list of current projects shown below for Denali: Denali National Park and Preserve Listed in the table below are Denali National Park and Preserve's current plans or projects. Current Projects (found total ' 24') Project Title Project Type NEPA Type C-camp Improvements/ Relocate Emergency Services and Law Enforcement Operations Capital Improvement EA Cantwell ORV Environmental Assessment Other EA Chemical Toilet Replacement Facility Rehabilitation EA Climbing Allocation for Mount McKinley Commercial Services Plan EA Concession Facilities Construction Capital Improvement EA Construct Meadow View Trail Capital Improvement Denali Headquarters Area Master Plan Implementation Plan EA Denali National Park and Preserve General Management Plan General Management Plan EA Denali Park Road Vehicle Management Plan Transportation Plan EIS Geotechnical Investigations Near C-Camp and in the Park Entrance Area Capital Improvement EA Multi-Purpose Trail in Entrance Area of Denali National Park Facility Rehabilitation EA Park Road Mile 4 & 4.5 Repair Facility Rehabilitation EA Plate Boundary Observatory Global Positioning System Network Permit - Research EA Porcupine FHWA Road Project Facility Rehabilitation EA Re-Align Dog Kennels Access Road Capital Improvement EA Rehab Denali Park Road Section, Mile 80-84 Facility Maintenance EA Rehabilitate Savage Alpine Trail Facility Rehabilitation EA Replace Eielson VC and Toklat Rest Stop Implementation Plan EA Replace Herron River and Live Trap Lake Subsistence Use Cabins Other EA Rock Creek Bridge Replacement Facility Rehabilitation EA Savage Area Rest Stop Capital Improvement EA South Denali Implementation Plan and EIS Implementation Plan EIS Two Trails Starting in Frontcountry Facility Rehabilitation EA Wastewater Treatment Facility Replacement Facility Rehabilitation EA

Source: NPS, USDI ? Denali National Park & Preserve Website as of 10-30-11

Compliance with NEPA becomes legally problematic when many related actions are piecemealed out across separate actions as though they are unrelated. That appears to be what is happening at Denali. It has become a prime example of agency actions that deflect the full weight and meaning of NEPA analysis and bypass consideration of the full environmental impact of all plans on a Conservation System Unit. (Allen Smith is writing about this for an independent publication.).

CONCLUSION: Denali is one of our nation's premier wilderness parks and should be treated as such. We strongly recommend that NPS reject the approach to planning for the Denali Park Road contained in this DEIS and develop additional Alternatives besides Alternative A, No Action, that address the concerns we have raised above regarding continuing and increasing adverse impacts on wildlife and wildlife habitat and adverse effects on wilderness character. We also strongly recommend that NPS retain the existing structure of Denali Park Road Management Zones and lead its plan with a convincing analysis of the Denali Park Road and Wilderness Area carrying capacity. NPS is already proceeding with a form of adaptive management at Denali but needs to refine it in a direction that will allow it to meet its legal obligations to protect Denali National Park & Preserve and its designated Wilderness Area.

Rather than responding to higher and higher expectations for the level of facility and use the public is perceived to want in this wilderness park, NPS should be educating the public as to what facility and access use is appropriate and should be expected in a wilderness park and why that standard is necessary to protect those wilderness values. NPS should provide a supportable analysis of use capacity for the Denali Park Road and the adjacent surrounding Wilderness Area as a means to establish limits of use that protect the Park and its Wilderness Area and can be convincingly explained to the public. So far, this plan does not yet do that.

Again, thank you for this opportunity to comment on the Denali Park Road Vehicle Management Plan and for your consideration of these comments. We look forward to answers to the questions we have raised.

Correspondence ID: 258 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I am a year-round resident and property owner in the Panguingue Creek Subdivision. Like many people in the Denali area, I first came to Alaska to work as a seasonal employee of Denali National Park. Since my first season as an interpretive ranger in 1997, I have seen significant development in the park and a dramatic increase in

visitation. I love Denali National Park and I look back on those first years as a time when somehow a park visit seemed simpler, more genuine. Now I fear the Park has been taken over by industrial tourism. Therefore, I submit my comment in support of Alternative A, No Action, simply because it states a vehicle limit. Neither B nor C set a capacity limit, and without that, I fear politics related to major tour operations would surely play too major a role in the adaptive management. In fact, I think that is what is happening currently, but at least we have a set limit! I would like to see a plan that stresses wilderness management as a priority, better supports the independent visitor, and states limits.

Correspondence ID: 259 **Project:** 22494 **Document:** 42309 **Private:** Y
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Thank you for your time and effort in assembling the Draft Vehicle Management Plan and Environmental Impact Statement. There is an incredible amount of information assembled here. I look forward to having the time to read it in greater depth this winter. The following are my comments and should be made part of the public record. I prefer that my personal information be kept private. Quotes may be used (preferably without my name). Also, I prefer personal information not be shared, if possible. After spending time with the DVMP I still need to ask why we are reinventing a system that has been evolving and improving over decades. The public is satisfied with our current system (85-90% approval). We have a system that works and accomplishes most goals as described in the DVMP. Just a few years ago the NPS used to promote the idea "that when Sistine Chapel was full, it was full." All environments have limits and carrying capacity so has Denali. The 10,512 has number served this limit, this carrying capacity well. Thus, I feel that Adaptive Management (AM), Standards and Indicators should only be implemented under the over-arching umbrella of the current vehicle limit of 10,512. NO EXCEPTIONS! Then after AM has been optimized over 15-20 years the option of removing the 10,512 limit could be revisited. The system works well and we are currently at 80% of the limit. The current infrastructure was built to operate with the current system and functions well (with the exception of overcrowding at rest stops). There is time to implement the new approach while staying with what has been successful, simply and easily understood. To do away with this limit is destabilizing. In the absence of this option I must support only Alternative A. ? Please better define the "purpose and need" statement. Why is this VMP and alternatives needed when visitation is trending downward and the world is approaching peak oil? ? All vehicle counts should be covered in charts discussing vehicle limits. ? The study should address the potential for trends of visitation in light of peak oil and climate change scenarios. This cannot be ignored. ? Why didn't NPS implement the VMP as part of an amendment to the 1997 DCP? The 1997 DCP was meant to be a decades long document. We seem to be doing an expensive repeat of previous work. The capacity set in the 1997 Plan said, "The NPS is currently developing a visitor experience and resource protection program addressing carry capacity?DNPs 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 resources and social conditions are achieved and maintained." This seems to work for current conditions. Why are we not moving ahead in this direction? ? The primary purpose of a Vehicle Management Plan (VMP) should be to protect resources of Denali Park and manage visitation. I am concerned that the importance of providing a quality experience and interpretation could be of more concern than protecting the health of the ecosystem. ? Please provide greater information on the purple section of the Park Road (as shown on planning maps) between the Old Park boundary and Kantishna that is called "Special Use Area." ? In my opinion the past study sampling of bears and sheep was too small to be statistically accurate. After 30 years of direct observations I know bears and other animals are disturbed by buses and other vehicles to greater consequence than has been described. ? Regarding Goal 2: Requiring ALL visitors to receive interpretive messages seems to violate individual choice and freedom. Some people are self-motivated and don't want a packaged message. Some are repeat visitors. Additionally, this will increase costs associated with the system. And all efforts to keep services affordable and inclusive of to all income levels is of the utmost importance. ? Regarding Goal 2 and 5: Goal 5 says that seating capacity should be "optimized" and "maximized" while Goal 2 says that the bus should provide an environment that enables visitors to engage with park resources in a meaningful way. I know that 52 passengers on a bus is cramped and crowded?like visitors packed in a sardine can, it is just not comfortable! It is difficult to see and connect with the Park when so crowded. Loading and unloading a bus with a greater than 48 capacity is time-consuming and adversely affects the visitors' experience. Planned bus capacity should be kept at a 46-48 seat maximum departing westbound from entrance, in order for visitors to have an enjoyable, engaging journey and only flow into the 46-52 range infrequently when picking up Eastbound on sunny crowded days. ? NO premium tours to Teklanika. The limit of Primrose was set for DNHT to take pressure off and reduce traffic on the road. (Please remember our history)! Sending DNHT to Teklanika waters down this goal limiting traffic while not gaining anything for the visitor. Teklanika is not a destination. Teklanika is a crowded restroom stop with a view of the River. Primrose is a destination, with a magnificent view of Denali on clear days. Primrose has an inspiring view of surrounding landscapes. Again I would support only Alternative A, if this segment is added. ? NO mandatory stops at Visitor Centers. Long tours are long enough without a mandatory stop at Visitor Centers. Making anything mandatory during a National Park visit infringes on personal freedom and choice. Visitors are offered the option of stopping at Visitor Centers already under the current system. Many visitors have 2 and 3 day stays and enjoy the visitor center at a relaxed pace on their free days. Better advertising and enticing posters and information could draw more visitors to visitor centers. Additionally, if the visit is mandated in the morning it may interfere with the visitor's enjoyment of viewing the Mountain as often clouds quickly build on clear days. Making the tour longer interferes with guests desire to do other activities such as rafting, hiking, flight-seeing, etc. Some guests many not have the stamina for longer tour lengths. ? Problems with Adaptive Management (AM). One, there is a conflict of interest with the concessionaire being involved in data collection. Having private business that stands to gain or lose and that depends on the quality and quantity involved in the collection of data is a poor scientific research practice. There should be a firm line between the NPS and the Tourism Industry, especially when considering point two below. ? Two, data accuracy cannot be guaranteed. Drivers willfully or unwillfully will make errors due to multi-tasking, lack of interest, "monkey-wrenching," forgetfulness, safety challenges, technology challenges, etc creating poor data-sets. Data is/would be collected in a changeable unpredictable ecosystem with inconsistent and variable input styles. Unless all data collectors use exactly the same rules, times

and parameters data would be inaccurate. ? Three, AM, requires confusing, complex monitoring and adjusting, with too many people involved that is expensive and subject to breakdown and maintenance problems. ? Four, AM assumes that there are accurate and measurable indicators for ALL resources and conditions; something that is not really possible in a complex and variable wilderness. It assumes that data accurately reflects reality. I feel the sampled collared bears did not accurately reflect reality. The sample collared animals was too small and too short of duration a sample to understand the complex movements of all the components of a large and variable ecosystem. ? Other important indicators that could/should be included in AM increasing complexity: human built structures in view shed, amount of dust, window visibility issues (mud on windows obstructing view), number of times passing buses and other vehicles pass hikers or in hikers view sheds, etc. CONCEPTS ? Concepts B & C are described as "flexible," however, the time management suggestions will make the system more restrictive by limiting time at rest stops, wildlife viewing stops, in scenic overlooks and rest areas. This is a disservice to the visitor, difficult to achieve and is simply an attempt to squeeze more people into the Park with extreme micro-managing time management techniques. ? Concepts B &C require so much equipment, monitoring, micro-monitoring that it will create layers of management and increase potential annual operating costs of Park operations by $1 million or more over current levels each year. In an era of severe budget issues and declining DNP visitation (perhaps due to more than the current economic conditions, i.e. peak oil and climate change), when we are questioning the existence of Social Security, Medicare, and other important environmental and human welfare issues, these additional expenditures seem unnecessary and unreasonable. ? Camper buses. Proposal B does away with camper buses while suggesting backpacking equipment, coolers could be stowed outside of the bus. Gear stowed outside would be ruined by wind, rain, mud. It couldn't be placed on the sides. The gear would be too muddy or dusty on front or back. The roof would be too difficult and dangerous. How exactly is this to be done? How much time will it take in repeatedly stowing and removing gear? ? "Puddle shuttle." Under Concept C the NPS suggests a bus between EVC and WL/Kantishna. This was done twice before. It failed. It causes a back-up of passengers waiting to transfer; crowding, confusion, and anger as EVC becomes a transfer hub log-jam. We need to learn from history and experience. At the MSLC DVMP information meeting the audience was told the buses for the "puddle shuttle" would originate at the East end, which would require a 7 hour round trip to just stage and return the bus. Drivers have limited hours they legally can drive and could easily exceed the legal limit. Describe how this could be done or provide a discussion of housing options at Toklat. ? Alternative B & C give too much power and discretion to future superintendents. The superintendent is given over-riding power regarding final decisions in alternatives B & C. Political pressure in this day and age can be extreme and lead to poor outcomes; increasing numbers of vehicles to the detriment of the Park and visitor. To protect Denali from this possibility a finite cap needs to be retained in place (10,512). ? I do not support any plan that allows an increase in the number of buses. An increase in bus numbers will negatively affect the wildlife behavior, survival and visitor opportunity to view wildlife and experience a tranquil untrammeled wilderness. ? All concepts: All buses should be able to stop at Teklanika (except DNHT which should not go to Teklanika). ? A local area transportation system should be established between Healy, DNP and McKinley Village as described in the 1997 NPS Road Plan documents. ? NPS must maintain access to Kantishna as guaranteed in ANILCA. However, a cap of day tours and overnight tours must be made at current numbers. ANILCA was concerned with mining access and did not foresee a boom in tourism that directly impacts the Park's well-being. NPS should continue to buy out Kantishna property as it becomes available, funding allows and "sellers are willing". NPS should not encourage more tours beyond EVC, such as the Kantishna Experience. Those desiring this destination will figure out how to travel and experience Kantishna without promotion. ? Park Road Maintenance Standards -2007. Maintenance Standards must be open to public comment as they were not vetted by the public when they were allowed Categorical Exclusion. The structural integrity of the Park Road must be considered along with the Vehicle Management Plan. For the above reasons I feel Alternative A should be tweaked, improved and maintained.

Correspondence ID: 260 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: After examining the draft plan, I am not sold on the alternatives to the status quo and therefore stick with "A." If I could sum up my "sense" of "B" and "C," I would say there is too much uncertainty.

Correspondence ID: 261 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Thank you for the opportunity to comment on the Denali Vehicle Management Plan. Of the alternative options I favor Alternative A. The Denali Citizens Council submitted a very comprehensive comment and I am in favor of their recommendations if a hybrid approach can be taken. Access into the Denali National Park via the road to Kantishna provides wonderful opportunities for the public to experience the wilderness and the wildlife of the region. The National Park Service recognized long ago that vehicle traffic could negatively effect the core values of what made Denali an unique place to visit and initiated a bus system. Overall the system has been very successful.

The Denali Vehicle Management Plan is very confusing. Alternatives B and C sound difficult to implement and track and would be very expensive to administer.

The management plan has to protect the wildlife along the road corridor and the publics capability to view the wildlife. To do this NPS has to know what the carrying capacity of traffic on the road is to ensure that wildlife will not be driven off. This carrying capacity must be able to be clearly understood by both present and future park personnel, commercial interest and Kantishna inholders. I would not want to see more traffic than there already is.

Since the normal access into DNP is by bus there needs to continue to be a very reasonably priced public transit system with minimum wait times for day hikers and backpackers to board buses out along the park road.

To protect the soundscape along the road for both the wildlife and the park visitors I recommend even slower speed limits on the road and switching to quieter buses as technology improves.

Correspondence ID: 262 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Thank you for allowing comments to be submitted in response to the alternatives identified in the Denali Park Road Draft Vehicle Management Plan Environmental Impact Statement. The Joint Venture agrees the implementation of a new Vehicle Management Plan has significant implications for determining experiences for Park visitors for at the least the next 20 years while at the same time ensure resource impacts are minimal as a result of any transportation system along the Denali Park Road. The Joint Venture agrees that NPS must have the flexibility and nimbleness to adjust Park Road capacity levels to ensure the resource is protected while also ensuring a quality Park Road experience is maintained based on wild life viewing acceptable standards. The Joint Venture supports the NPS mission to preserve and protect while providing for the enjoyment of this and future generations and sees the Vehicle Management Plan as a mechanism to fulfill this mission in a balanced fashion.

The Joint Venture also recognizes there are differing points of views regarding how transportation should be managed along the Denali Park Road, including the extremes of little to no access to full, unimpeded access based on demand within the visitor travel industry. The alternatives put forth in the Draft Vehicle Management Plan EIS represent an attempt to achieve balance between these extremes and NPS should be commended on this effort. The Joint Venture applauds NPS for looking outside the box to provide for more diverse choices for Park visitors and their experiences, while looking at new ways to manage traffic levels that provide Park Managers adaptive tools to adjust access in order to maintain desired conditions for wild life viewing. With this in mind, the Joint Venture submits its comments from the perspective of a potential operator of these concession services. It is from this perspective our comments are based. It should be pointed out though that while we have participated in the ATIA process for developing comments and a response to the Draft Vehicle Management Plan, the Joint Venture has not actually provided any comments or editorial responses to the ATIA position it intends to submit on behalf of the industry. Rather, the role the Joint Venture has played is to clarify erroneous assumptions and inaccuracies the industry has regarding the current tours and transportation system along the Denali Park Road. That is not to say, however, there are not areas where the Joint Venture and ATIA are aligned. There are. But it is important to note that as NPS reads through and considers comments from ATIA and other independent industry partners, these comments do not necessarily represent the position of the Joint Venture even though industry comments may contain statements that they represent all members within the ATIA organization.

Doyon/ARAMARK Denali National Park Concession Joint Venture Preferred Alternative Based upon the information available as contained in the Draft Denali Park Road Vehicle Management Plan EIS, the Joint Venture prefers and recommends Alternative C, with the following modifications:

1. Eliminate the Self-Guided Economy Tour 2. Incorporate the Self-Guided tour elements of the Economy Tour into the Transit Service a. Self-Guided tour elements could be included with ticket price b. Self-Guided tour elements could be an optional additional purchase 3. Maintain a base level of Transit seats at 52,175 (2,370 buses) as identified on pages 308 and 309 of Appendix D of the Draft Denali Park Road Vehicle Management Plan EIS. 4. Utilize and characterize the remaining 330,117 seats for tours. These tours would meet the criteria of premium tours that could be offered to varying destinations along the Park Road, including Teklanika, Toklat/Stony, Eielson VC and Wonder Lake/Kantishna. 5. If adaptive management to desired conditions dictates capacity for Teklanika Tours at 2,664 buses and Other Premium Tours at 2,530 buses? then these levels can serve as base levels and have the 84,960 seats (1,770 buses) identified for Economy Tours allocated to either tour as market conditions demand. These seats could also be allocated to Transit based on demand for visitors just wanting access into the Park and to meet wait time standards. 6. Eliminate Loop buses that are intended to operate from Eielson to Wonder Lake.

Rationale Two important dynamics form the basis for the above preferred alternative with identified modifications. One is the basic premise surrounding the formation and operation of the VTS or Park Shuttle Bus system, now referred to as Transit in the Vehicle Management Plan. And two, the need to engineer simplicity into choices for Park Visitors.

The basis for the Transit Service is to provide access all along the park Road as the alternative to driving one's private vehicle into the Park. The shuttle system to provide this alternative access into the park was established in 1972 and was funded through congressional appropriations for 2-3 year contract terms. Over the course of the past 40 years, this system designed for access as an alternative to private vehicular traffic as morphed into an "economy" tour. This evolution has been encouraged by NPS and as a result as served as direct completion with the actual tour products offered by the concessioner. The result has been the concessioner has been placed in a position to have to compete with itself. This is outside any normal business model where a given business entity has to provide two different forms of transportation service. To maintain brand

integrity, an acceptable and standard business model would be to create as many points of differentiation between the two particularly where there is a wide gap in pricing between the two products. However, over the course of time the opposite has occurred outside the control of the concessioner. The result has been a wider price gap but a narrower product gap with respect to differentiation between the two products. With extraordinary cost increases over just the past 5 years an economic unsustainable system has been created, whereas the higher priced TWT and to a lesser extent the DNHT are subsidizing the economically unsustainable VTS.

To maintain tour viability, transit and tour products need to be fully separated. Taking the current condition of a tour expectation within VTS, separating it and making it its own product at its own price point will not solve problems associated with the current condition. In fact, as the operator of the current condition, the Joint Venture sees the creation of any type of economy tour as continuing if not exacerbating problems associated with the current condition. Having Economy compete with Premium Tours and making Economy Tour seats available in block to cruise companies and wholesalers will negatively impact product integrity of Premium Tours. In addition, having two sets of standards between Economy and Premium Tours will be more difficult to manage and evaluate and create additional costs upon the concessioner to train and manage to.

Therefore, NPS should maintain perspective with respect to the original basis for a VTS, Park Shuttle or Transit system and use the Final Vehicle Management Plan as an opportunity to restore Transit service back to its original intent and offer as an alternative to access a high quality tour experience with common standards that are only differentiated by distance traveled. Essentially, there would be Transit service to provide access all along the Park Road and Tour services that could travel to all destinations along the Park Road. The capacities identified for Alternative C in Appendix D: Traffic Model Results for each of these services can be set as a baseline with the additional Loop buses (909)and Economy Tour buses (1,770)available to allocate between Transit and Tour based on demand for either service.

This type of Transit/Tour system lends itself to simplicity? from marketing to service delivery as well as standards management and evaluation. Transit is transit and a tour is a tour. Transit service standards would comprise of drivers providing compulsory safety information and rules of behavior for passengers. Drivers would stop for wildlife but maintain an appropriate schedule. Information at wild life stops would be basic and limited to identifying and acknowledging the animal spotted. For a more educational experience akin to an interpretive tour, self-guided materials could be developed and provided as either an add-on service at an additional cost and therefore optional to the visitor, or, as material provided to all as a part of the ticket price.

Tours would all be consistent with respect to interpretive standards provided by the driver. Tour buses would be spec'd in the same manner with videography capability and other upgraded interior features. The only difference would be distance traveled and perhaps type of snack provided based on distance (two food and beverage spec's: one for the Teklanika destination and one for the longer Toklat/Eielson or Wonder Lake with quantities of food provided appropriate for the distance traveled and time out on the Park Road). A portion of these tours could also include off the bus experiences that include the Denali Visitor Center (especially the shorter Teklanika Tour) and/or specialized topics around birding, photography, wild flowers, geology, etc. Based on demand for specialized tours, inventory could be marketed and allocated in a fluid manner. This type of tour system could offer a diversity of options within the same basic program and meet the objectives of Alternative C to maximize visitor opportunities while also meeting the objectives of Alternative B of optimizing access. And such a system would achieve these objectives with the least amount of confusion.

Pricing Though not addressed by the DRAFT Denali Park Road Vehicle Management Plan EIS, to truly provide commentary on a preferred alternative based on economics requires dome discussion about how rates do need to be factored into how a final plan will be developed. With this in mind, the Joint Venture recommends the following rate guidelines be used in making final determinations:

1. Transit Service needs to be economically sustainable. At a minimum the service needs to pay for itself. The public will understand such a rate structure and not expect the concessioner to subsidize this service through higher tour pricing. 2. Maintain similar rate methodology for tours as exists in the current condition. 3. A break-even Transit service would support lower tour pricing on average, making it more affordable. 4. Commission structures should NOT be a component of any final Vehicle Management Plan. Commission structures are business decisions made the provider to incentivize the market for increased business. It would be inappropriate to legislate any type of commission structure. 5. Eliminate an Economy Tour option. Pricing for such a tour, given it would travel to the many if not all of the same destinations as the Premium Tour, would create yet again a business scenario whereas the concessioner would be placed in a position to compete with itself, only with graver consequences. This is because with an Economy Tour that allows for block space to be granted to Cruise Companies and wholesalers, Premium Tours would be less desirable, particularly given points of differentiation would be difficult to justify a higher ticket price for a Premium Tour? more so than the current condition.

Additional Comments 1. All tour and transit services, regardless of type, should be provided solely by the concessioner. Specialized tours can effectively be provided for by the concessioner given more rigorous standards for interpretation and resource knowledge than currently may exist. The concessioner can also accommodate NPS step on Ranger personnel to enhance this experience and has proven effectiveness in this collaboration, e.g. the Kantishna Experience under the current condition, 2. Seat allocations, if required, should honor the spirit with which the original allocation was first developed and implemented in 1985. Any seat allocation program should be hotel based and give priority to those hotels with longest history in the Denali corridor, between the communities of Healy and Carlo Creek. 3. Tour length for a Teklanika Tour

would have to be at a minimum 5 hours, based on current condition where Teklanika Tours are offered in the Spring and Fall shoulder seasons. Conclusion The Doyon/ARAMARK Denali National Park Concession Joint Venture recommends Alternative C with the following modifications: 1. Eliminate the Economy Tour 2. Eliminate Loop Buses 3. Maintain Transit service as it was originally established to be? access into the Park as the alternative to private vehicular traffic, all along the Denali Park Road. Baseline capacity for Transit should be as identified in Tables A and B (pages 308 and 309) of Appendix D: Traffic Model Results. 4. In addition to Transit, provide tours to destinations between Teklanika and Kantishna. Baseline capacity for Teklanika and longer tours should be as identified in Tables A and B (pages 308 and 309) of Appendix D: Traffic Model Results. 5. Utilize the remaining 1,770 buses identified in Table A, Appendix D: Traffic Model Results as a pool that can be allocated to either Transit or additional tours based on demand, hiker wait time and other standards related to a desired condition. This will ensure Transit receives the priority intended by the Draft Vehicle Management Plan while also providing growth opportunities for the industry without having to increase capacity. 6. Ensure pricing for Transit service results in a break even financial scenario for the concessioner at a minimum.

Thank you again for the opportunity to comment on the Draft Denali Park Road Vehicle Management Plan EIS. As the planning process continues we are available to further clarify any position commented upon in this submittal. Please do hesitate to reach out to me directly if there is an opportunity to further discuss these comments.

Correspondence ID: 263 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I am a year-round resident and have lived in the Healy/Denali area for the majority of my 37 years. I was also a Denali Park Service employee on and off from 1997 until 2010. My concerns about the park road management plan stem from my deep attachment to Denali's backcountry and my hope that its wildlife character be strongly protected while retaining affordable access for the average visitor. I support Alternative A, No Action, not because I think the status quo is perfect'indeed, I do not think it is, and I support the NPS's desire to create a capacity that more accurately reflects actual park use, and incorporates adaptive management strategies. However, both Alternative B & C fail to adequately address my concerns about consistent management for wilderness character, and affordable access. My two most specific concerns about the alternatives are as follows: 1. Neither B nor C provides the "safety net" of a firm capacity limit for the park road. Although adaptive management is appealing in that it clearly links capacity to data and is less random than the arbitrary 10,512, I would like to see adaptive management used over a set period to generate the data necessary to determine a new, appropriate capacity addressing the traffic that falls through the cracks in the current plan, (ie, photographers, NPS vehicles). Because of the budget increase required to fund, interpret and enforce annual monitoring, the proposed alternatives feel cumbersome, unlikely to respond quickly to oversight and overreach, and too open to the vagaries of politics which could change both the tone of park leadership and the budget available for monitoring. I do not support a plan that has no numerical "safety net," and thus requires that the public trust the NPS's good intentions. Over the years I have seen a general erosion of commitment to wilderness management, which concerns me, and for this reason I will only support a plan with firm capacity limits that are informed by adaptive management strategies. 2. Neither B nor C unequivocally supports an affordable transit option for independent travelers on a budget. Both options feel too heavily weighted towards the interests of industrial tourism. The current transportation option is already financially onerous for many Alaskans. Park access should be feasible and travel prioritized for all visitors, not just those on tours. In conclusion, I support the park's desire to update the road capacity to a level that is based on adaptive management data, but I cannot support either of the two options without serious changes. I support the critiques and recommendations to the plan as articulated by DCC and if I've heard my community members correctly, many of us in the region feel similarly. If the park listens to the comments along these lines and makes a good faith effort to draft an alternative addressing these concerns, I will definitely reconsider my support.

Correspondence ID: 264 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I'm writing to voice my comments on the draft vehicle management plan for Denali. I favor option A, which retains the existing vehicle cap of 10,512. However, I am concerned about the potential increase in vehicle use west of Eilson that may be allowed under this option and would hope that this would not be implemented without soliciting further comments (especially from shuttle bus drivers, lodge inholding bus drivers and others who spend time in this area). I've been driving in the park and west of Eilson for Camp Denali since 1997 and I would say wildlife sightings in this area (especially of caribou, moose and bear) have decreased substantially, especially in the past 2 years. The construction that widened pullouts west of Government Draw may have contributed to this. Also, the gravel trucks hauling through the Wonder Lake area to the end of the road this year wereI very noisy (Jake brakes in the 2 downhill stretches from Xerxes toward the WL campground and from Reflection Pond to the Ranger Station could be heard 8 miles away). Thank you and please keep us updated on the process.

Correspondence ID: 265 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: It has taken me quite a while to decide how to write this letter. For this reason I may have missed the deadline to comment on the Draft Road Management Plan in a timely fashion. I feel the need, however, to write to you as a concerned citizen and VTS Bus Driver for 20 seasons.

My first seasons in Denali were in 1982-1985. After a ten year hiatus, I returned in 1995 and have continued each season since then. During these years I have served as VTS Operations Manager, Trainer, Road Supervisor, TWT Driver and VTS Driver. From this broad experience platform I offer you the following viewpoint.

It is out of concern for visitors such as you, Superintendent Anderson, who have found themselves "stuck" along the Park Road for longer periods of time than desired. I came upon you, with your bicycle, early one morning near the East Fork cabin as you were trying to head west to meet up with friends. I remember that it was a bit chilly and that the bus you were aiming to meet was late. I came along 1/2 hour after and was unable to take you aboard as our bus was full with no room for bicycles. I stopped to ask if you were ok, as I do with everyone alongside the road. Noticing that you were getting cold, I was happy to say that a bus for you would be coming along shortly.

Later that afternoon, it was a different story. I came upon you and your group near "I Scream" Gulch, near Mi. 49. Again I stopped because the weather was starting to turn and our buses were running quite full. I asked if you were all doing ok and if you would be needing a ride. Fortunately, you replied that you were all doing fine - sometimes cold, sometimes warm - but that you were just heading to the East Fork Cabin. I was happy to hear you say that you were planning to ride all the way there.

What I did not say was that if you wanted a ride, the next bus with room for you was just now leaving Kantishna, heading East. It would probably be here to pick you up in a couple hours. What if you had been really cold? What if you had wanted a ride? Is telling our visitors to plan on being on the road for an hour before being picked up really a good idea? What happens when a bus breaks down or is full and that wait turns into 2 hours?

I have reviewed the Draft Management Proposals and have struggled to see how they will address many of the problems we have along the Road Corridor. I have a hard time seeing (from my Management experience) how some of the items in Options B & C can be implemented and monitored. Other people, including the Denali Citizens Council, have outlined these concerns in fine detail and I concur with many of their conclusions.

I would like to suggest that we stay with Option A and focus on fixing the things that need to be fixed, starting with the current reservation system that book buses until they are full. I miss the day when people would arrive at a beautiful spot, like the top of Highway Pass, and just ask to get off the bus. They would spend 20-30 minutes in the quiet and solitude of such beauty KNOWING that the bus coming behind had room for them. People got off A LOT when they felt they had that freedom. Those days have faded away.

Perhaps returning to the past to learn what worked and what hasn't (Puddle Shuttles to WL) would be a good exercise. I have always been taught that studying history is important so we don't make the same mistakes twice. Please listen to many of the comments from people who have been on the Park Road for many years as perhaps they can provide some valuable feedback.

Correspondence ID: 266 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: I. <Intro omitted>

II. Comments

A. Doyon urges the NPS to select Alternative A, the No Action Alternative

Doyon urges the NPS to select Alternative A, the "no action" alternative rather than one of the two action alternative presented in the Draft Plan. Doyon recognizes the NPS's need to, from time to time, revisit its management of uses of the various units of the NPS. However, this need does not translate into the need to change current management where that management is working well and consistent with the NPS's mission to "conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

NPS states that the purpose of revising the plan is to "inform the management of vehicles along the 92 mile long Denali Park Road" and that the goal of the Plan is to "provide a high quality experience for visitors; protect wilderness resource values, scenic values, wildlife, and other park resources; and maintain the unique character of the Park Road." The premise of the action alternatives identified and evaluated in the plan is that reconsidering the park road's user capacity and the various means of providing transportation that currently take place using the park road is necessary to meet these stated goals. Yet, the plan and DEIS do not provide meaningful factual data and

information to support this premise. In the absence of any such data and information, the two action alternatives appear to propose solutions that are in search of a problem and changes that are disproportionate to the issues they seek to address.

Moreover, as discussed further below, Doyon is concerned that the two action alternative are not well enough defined to enable Doyon and others to respond meaningfully to the plan and DEIS and to provide specific criticism and recommendations. Doyon appreciates, at least in concept, the park's interest in an adaptive management approach. However the DEIS still must provide for public review alternatives that are sufficiently defined to enable the public to meaning fully evaluate how the changes reflected in those alternatives will affect their and others' interests. Unfortunately, there is so much uncertainty and leeway ? and so much discretion given to future superintendents- in the two action alternatives that the DEIS fails to provide such an opportunity for meaningful comment. Absent such further definition and explanation, Doyon cannot support either of the two action alternatives.

B. The selected alternative should not include the proposed limitation on commercial use for Kantishna Inholders included in Alternative B or C.

Both of the action alternatives identified in the DEIS would limit the ability of Kantishna inholders to continue to provide day trips. The alternative ultimately selected by the NPS should not include any such limitations.

As NPS notes, two of the Kantishna lodges "operate 12-hou long commercial day tours to Kantishna and back to the park entrance." Doyon has now operated the Kantishna Wilderness Trails (KWT) all-day excursion for 16 consecutive seasons. In total, the trip has been offered and in operation for at least 25 years. To accommodate demand, Doyon operates as many as two, and sometimes three, buses per day during the peak season to provide this service. Denali Backcountry Lodge started operating its Denali Backcountry Adventure trip approximately 8 years ago, modeling it on the KWT excursion. Denali Backcountry Lodge similarly operates two, and sometimes 3, buses per day during the peak season to provide this service.

As noted above, both of the action alternatives would limit the ability of the two lodges (and other inholders that might decide in the future to establish such an operation) to provide this service even at current levels. Alternative B provides that "Commercial authorizations would be issued to retain current levels of day tour service to each Kantishna lodge (not to exceed four per day total for all lodges combined)." Assuming "four per day" refers to the number of buses per day, Alternative B would, in fact, reduce current levels of day tour service to each Kantishna lodge. It would not, as the Draft Plan asserts, retain such current service levels.

Alternative C provides that "One or more commercial authorizations would be issued for commercial day tours to Kantishna." Under this alternative, then, it appears that the two lodges potentially would not be permitted to both continue to provide these longstanding services.

Moreover, neither Alternative B nor Alternative C is clear as to how the total authorized use would be allocated or shared (whether among the existing operators or new entrants). In addition, the Draft Plan states that boy Alternative B and C "may also require reallocating use between the transportation system vehicles and other vehicles of the Park Road," which could further reduce authorized use for these trips. As a result it is impossible to determine to what extent these existing operations would have the opportunity to continue under either of these action alternatives.

Because the two action alternatives, as described in the Draft Plan, are not clear as to how much total use will be authorized for day trips to each Kantishna lodge or as to how such total use will be allocated among existing operators and/or new service providers, it is difficult to determine exactly how Doyon's existing KWT operations would be affected by either of the action alternatives. The description of the alternatives in the Draft Plan, however, indicates that the two action alternatives would result in a reduction in the level of authorized Kantishna lodge day trips.

The KWT and Denali Backcountry Adventure lodge day trips have been operated for many years, without any demonstrated adverse impact on Park resources or on visitor enjoyment. These trips provide unique opportunities for Park visitors to experience and learn about the Park and its natural, cultural, and historic resources and significance. And the numbers of buses run to provide these trips is by no means excessive. There simply is no reason to limit these trip offerings in the final plan.

The NPS has long accepted the operation of KWT (25+ years) and Denali Backcountry Adventure (7+ years) lodge day trips. In past years, the NPS provided direction to KWT on the way in which such day trips are described and advertised to park visitors. The NPS and lodge owners in the Kantishna valley have a long history of dealings that has recognized the significance of day trips to the economic vitality of lodge operations in this remote area. This significance exists today as strongly as ever.

Recently, NPS has, through its actions, acknowledged the beneficial nature of these long day trips by instituting the "Kantishna Experience", beginning with an all-day tour

in 2007 with one trip per day and quickly increasing to two trips per day in 2010. Placing limits or eliminating the long-operating lodge day trips while increasing Kantishna Experience buses would adversely impact the ability for KWT to provide ingress and egress to Doyon's property for potential customers to the Kantishna Roadhouse. The NPS Kantishna Experience does not focus on Kantishna Roadhouse, nor does it promote the Kantishna Roadhouse as a destination, as does the KWT. It would reduce this much needed access right provided under ANILCA, as discussed below.

Accordingly, Doyon respectfully urges the NPS to limit the ability of the Kantishna lodges that have historically operated day trips to continue to provide this long-running service at current levels.

C. The Final plan must be consistent with ANICA's Unique and specific provisions governing access to inholdings

Congress enacted ANILCA to protect Alaska's natural resources and ensure economic development opportunities for Alaska Natives and other private landowners in the State. ANILCA included unique and specific provisions to guarantee that such landowners would have reasonable access to inholdings in Alaska's national Parks so that they could make economic and other use of their property. Doyon is concerned that Alternative B and C may fail to fully recognize the pre-emptive status of these provisions. It should be without dispute that any elements of the plan that may affect access to inholdings in the Park must be fully consistent with these provisions.

ANILCA sought to encourage economic development by creating a comprehensive, balanced regulatory regime to govern the use and development of lands and resources in Alaska.

In enacting ANILCA, congress intended that nonfederal land within conservation system units in Alaska, including National Parks, would remain available for development. In setting forth the very purposes of the statute, section 101(d) of ANILCA expressly recognizes the balance struck between resource protection and development:

This Act provides sufficient protection for the national interest in the scenic, natural, cultural, and environmental values on the public lands in Alaska, and at the same time provides adequate opportunity for satisfaction of the economic and social needs of the State of Alaska and its people, accordingly, the designation and disposition of the public lands in Alaska pursuant to this Act are found to represent a proper balance between the preservation of national conse4rvation system units and those public lands necessary and appropriate for intensive use and disposition?

16 U.S.C. Section 3101(D). Congress included special provision in the Act to assist landowners in fulfilling this important, recognized economic need. Access to Inholdings Under ANILCA

ANILCA includes specific and critically important provisions that ensure reasonable access to inholdings in National Parks in Alaska. Subsection 1110(b) of ANILCA requires DOI to provide "adequate and feasible" access to private inholdings within National parks and other conservation system units in Alaska. Specifically, subsection 1110(b) provides:

<quote omitted>

16 U.S.C. Section 3170(b).

DOI has adopted multi-agency regulations governing access to inholdings under ANLICA subsection 1110(b) at 43 CFR Section 36.10. As the Department recognized in promulgating these regulations, the legislative history of ANILCA "clearly states that the grant of access must be broadly construed":

<quote omitted>

<reference omitted>

The Draft Plan

With respect to inholder access, the draft plan states as follows: ANILCA, Title XI, Section 1110(b) provides that inholders shall be afforded adequate and feasible access to their property subject to reasonable regulations that may include timing of road use, vehicle behavior, and use of park facilities. Permits to travel on the restricted section of the Park Road would continue to be provided to inholders to transport overnight guests and travel necessary for operation of the inholding. Park staff will work with inholders to address access to their inholding while striving to meet the goals of this plan.

Table 3, Summary of Alternative Elements, states that, under Alternative A, "Specific allocations for inholder vehicle use would be set annually in the Park's Compendium." Under the current compendium, for instance, Kantishna Roadhouse is allocated 420 permits, which includes any non-bus service or employee vehicle use. The Table, however, provides no information as to how such use would be addressed under Alternatives B and C. Once again, the lack of any such information makes it enormously difficult for Doyon and the public to respond meaningfully to these action alternatives.

Doyon also has substantial concern with the Draft Plan's statement that, under the action alternatives, "Other vehicle use, including that associated with?Kantishna inholder access?, may be reallocated to benefit the transportation system as described in chapter 2. " ANILC is clear that the access assured to Doyon and other inholders must be "adequate and feasible." It does not allow NPS to sacrifice such access "to benefit the transportation system."

As stated above, the lack of definition of the two action alternatives and the substantial and unbounded discretion they leave to future superintendents makes it difficult for Doyon to evaluate how these alternatives will affect access to its lands and its?

<footnote omitted>

?ability to obtain economic benefit from those lands, and to submit meaningful comments to the NPS in response to the Draft plan. In any case, it remains incumbent on the NPS to ensure that its final plan, consistent with the command of ANILCA, affords Doyon "such rights as may be necessary to assure adequate and feasible access" to its lands "for economic and other purposes," and that any regulations to which such access is subject are reasonable.

D. The final plan must provide reasonable certainty and ensure sufficient notice of management changes to allow operators of visitor services in the park and in park inholdings to plan for and carry out those services

As noted above, Doyon appreciates, at least in concept, the Park's interest in an adaptive management approach. However, it is essential that the NPS's final plan provide reasonable certainty and predictability for businesses and others whose planning decisions are dependent upon how the Park Road is managed, as well as ensure sufficient notice of management changes to the entities that provide visitor services in and adjacent to the Park and who rely on transportation on the park Road in connection with providing those services. It does not appear that either action alternative, as described in the Draft Plan, would meet this important goal.

As the Draft Plan recognizes, "The vehicle management plan may bring about changes in bus numbers, scheduling, spacing, and pricing that could alter concession operations and staffing." Further, "The social and economic conditions of the local gateway and regional communities, including residents and businesses, could be influenced by the actions taken to manage vehicle use along the Park Road." Based upon the albeit limited information provided with respect to each of the action alternatives in the Draft Plan and DEIS, Doyon believes that these impacts are more certainties than possibilities.

All of the backcountry lodges ? Kantishna Roadhouse, Denali Backcountry Lodge, Skyline Lodge and Camp Denali/North Face Lodge ? will be affected by the adoption of either Alternative B or Alternative C. Each lodge currently has a set allocation of seasonal permits to be used as that particular lodge deems appropriate. Under Alternatives B and C, these set allocations would go away and seasonal allocations would be determined by the Park Superintendent. How these determinations would be made, how often they would be made, and how far in advance they would be made are all important questions left unanswered by the Draft Plan.

Yet these issues are all absolutely critical to the ability of the concessioners, lodge owners, and other individuals and businesses in the community to plan for the future. Employment, purchasing (vehicle and otherwise), and advertising/marketing planning and decision-making, for instance, all will be affected by the Park's ongoing decisions regarding the management of the Park Road. Concessioners, lodge owners, and other individuals and businesses in the community will be unable to make educated and appropriate planning decisions in these areas if they don't know what their allocations of use will be from year to year and/or for the long-term.

It is critical that the final plan adopt a management scheme that provides certainty and predictability for businesses and others whose planning decisions are dependent upon how the Park Road is managed. The final plan should impose limits on the extent to which an allocation or use may be adjusted from year to year, and over the duration of

the plan. Moreover, it must ensure that the concessioners, backcountry lodges, and others who business or other interests will be affected by Park Road management decisions will have the information they need far enough in advance to make important planning decisions ?including business decisions that are critical to the ability of operators of visitor services in the park and in Park inholdings to continue to provide high quality visitor services in a financially sustainable manner.

III. Conclusion

As described in the Draft Plan and DEIS, the action alternatives, are not well-defined. Such lack of definition makes it difficult for Doyon to meaning fully evaluate and comment on the Draft Plan and DEIS, and, in particular, Alternatives B and C. Based upon Doyon's review of the Draft Plan and DEIS, therefore, Doyon urges the NPS to adopt Alternative A, the no action alternative.

In the event, however, that the NPS is committed to pursuing one of the two action alternatives, or some variation thereof, Doyon strongly believes that the action alternatives must be rewritten to clearly define parameters of the plans and the public given another opportunity to comment. Doyon prefers Alternative B, with certain modifications, over Alternative C. First, the final plan should not limit the ability of Kantishna inhalers to continue to provide day trips, as proposed in both action alternatives. Second, the Park must ensure that its final plan is fully consistent with its obligations under ANILCA and that it ensures that Doyon will, throughout the duration of the plan, continue to have adequate and feasible access over the Park Road to make economic use of its inholdings in the Park. And, third, the final plan must provide reasonable certainty and predictability for businesses and others whose planning decisions are dependent upon how the Park Road is managed, as well as ensure sufficient notice of management changes to the entities that provide visitor services in and adjacent to the Park and who rely on transportation on the Park Road in connection with providing those services.

Doyon's ties to the park and the surrounding area ? historic, cultural, and economic ? are deep and strong. The NPS has recognized that Doyon is a Native Corporation most directly affected by the establishment and expansion of the Park. It also will be most directly affected by this planning effort and by the new plan. Doyon urges the NPS to be mindful of the economic and cultural importance of access and use over the Park Road to Doyon and its members as it proceeds with development of its final plan.

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Correspondence ID: 268 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I have driven buses on the Denali Park Road for 38 years now. I have seen numerous changes over the years the most obvious is the decline in wildlife sightings, especially west of EVC. At least we always had that section of the road to depend upon for sightings, but that is no longer the case.

Plans that would put additional traffic in that section of the park are just ludicrous and show a lack of first hand knowledge of what actually goes on on the park road on a daily basis.

Bus driver after bus driver in Denali cringe at the thought of Plan's B or C being implemented.

There is already way too much traffic on the park road. On many, many days it is very simply a dust bowl which creates an awful experience for the visitor and it doesn't take a genius to figure out what impact that has on wildlife.

PLEASE go with Plan A. Thanks.

Correspondence ID: 269 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Thank you for the opportunity to comment on the Draft Vehicle Management Plan and Environmental Impact Statement for the Denali Park Road. Since 1919, the National Parks Conservation Association (NPCA) has been the leading voice of the American people in protecting and enhancing our National Park System. Today we have nearly

350,000 members of which over 1,000 are in Alaska.

We appreciate the many years of scientific study and staff effort that have gone into creation of this draft plan. It is clear NPS has worked diligently trying to develop the best possible method to manage the Denali Park Road. NPCA finds much to like about this plan and we offer the following comments.

ADAPTIVE MANAGEMENT

NPCA supports the use of adaptive management for determining vehicle capacity on the Denali Park Road with some modifications. We find the new plan has both advantages and disadvantages including the following:

Advantages ? Counts all vehicles ? including construction vehicles and the short tour which are currently outside of the 10,512 vehicle limit ? Alleviates early morning crowding by distributing buses throughout the day ? More legally defensible since standards are based on science ? Provides flexibility to respond to changing visitor demands

Disadvantages ? It is complex and not easily understood ? leads to lack of public support ? Proper implementation requires costly monitoring

NPCA Alternative: Short-Term Adaptive Management to select a new capacity number in regulation Our research has shown that while adaptive management is often considered to be good policy, implementation is frequently difficult and costly. Therefore NPCA supports a modified approach to Adaptive Management. Over the course of several years, we understand that using indicators and standards will eventually lead to a maximum number of vehicles that can be accommodated without exceeding the standards. We suggest NPS use the adaptive management process for 3-5 years to determine a new, more scientifically derived capacity number. Once that capacity number is determined, remove it from the Superintendent's compendium and put it into regulation.

Putting a newly determined number into regulation does several things. First, continued investment in collecting data will likely bring diminishing returns, so yearly monitoring can be suspended, saving significant expense and those funds (which we understand are several hundred thousand dollars a year) can be invested in other visitor related projects. Second, it removes the temptation to adjust the indicators and standards in the future. We're assuming that the indicators and standards ultimately adopted by this plan were scientifically selected and removing any temptation to adjust these in the future (something we fear could happen under political pressure) would be removed if the newly identified capacity number, based on Adaptive Management research, were adopted into regulation.

If the new plan proves problematic or unworkable, we recommend the system defaults back to using 10,512 as the vehicle capacity number.

PROTECTING TRANSIT

We offer the following comments regarding transit to help ensure it remains as a viable public transportation system.

Affordability Years ago, a budget traveler felt welcome in Denali. There was a youth hostel, unlimited space for backpackers in Morino campground, and inexpensive "Pullman sleeper cars" at the Denali Park Hotel. None of these options exist today. Additionally, there was no entrance fee and park shuttle buses were free. We recognize times have changed and don't object to modest fees to enter the park and ride a bus. Nonetheless, taken altogether a very different price structure has emerged making Denali far less available to the budget traveler, young family, or local resident. That makes it all the more important that transit be priced as low as possible. We understand that most public transit systems in the United States rely on subsidies and Denali should be no different, especially since private vehicles are not allowed.

We're not sure the draft plan's definition of affordability based on a visitor's "perceived value" is the best standard to use as there is no way of measuring potential visitors that didn't come due to the cost. We don't have a better definition to suggest, but rather encourage your efforts to continue to recognize the importance of welcoming all visitors, regardless of income level, by keeping transit prices as low as possible.

Transit Departure Wait Time We appreciate the inclusion of the standard regarding hiker wait time, and fully support the plan's emphasis that transit takes priority over other bus systems. We assume this means that if all bus seats are full (as has happened in previous years) getting an available transit seat will be as easy, or easier, than getting an available tour seat. Unfortunately the Hiker Wait Time standard doesn't provide for this. We wonder if an additional standard such as Transit Departure Wait Time is needed

regarding the wait necessary to board a transit bus compared to a tour bus to insure proper allocation between the two systems.

Create an Independent Reservation System Having the park concessionaire sell tickets for both transit and tour buses makes sense on one hand, but also causes problems. Anecdotal stories abound of visitors being sold higher priced tours that did not suit their needs and being unaware the lower cost transit system existed. We don't know if these stories are true, but the large price difference between the two bus systems does set up a challenging dynamic. Expecting a for-profit company to sell a no frills public transit seat in competition with its for-profit premium tour creates a tricky situation and puts the park concessioner in an extremely difficult position.

Since the park road is closed to private vehicles the park service has a responsibility to ensure the public has easy access to information regarding all bus options. We highly recommend NPS separate bus reservations from bus operations. We suggest the reservation function (for both tour and transit) goes to a separate company that is paid a flat fee for providing this service. Creating a neutral third party and removing the financial incentive to sell higher priced tickets, will improve the likelihood that visitors receive thorough information and purchase the bus best suited to their needs.

PREMIUM TOURS

Teklanika ? We support the expansion of the short tour to Teklanika as long as it is counted within the indicators and standards, or the 10,512 capacity limit if the No Action alternative is chosen. Visitor demand for the short tour is high and we believe expansion to Teklanika will improve the quality and visitor satisfaction over the current option.

Eielson ? We are less supportive of expansion of the long tour to Eielson Visitor Center and unsure what visitors gain by this longer trip. If the mountain is out, or wildlife sightings have been low, tours already have the option to travel to the extended turn around at Stony Hill Overlook. Traveling four more miles to reach Eielson Visitor Center provides little in additional scenery or wildlife. If spending time at a park visitor center is the goal, it makes more sense for these passengers to visit the main visitor center at the park entrance, possibly at the end of their bus trip or at another time during their stay.

Additionally the standard for number of vehicles parked at Eielson Visitor Center seems excessive, and unable to accommodate additional tour buses. The standard in the draft plan (for up to 10 buses - most which hold 45-50 passengers) far exceeds the building capacity of 250 people. Adding additional tour buses into the mix at Eielson does not seem prudent. We recommend the vehicle standard for Eielson Visitor Center be reduced to 6 ? 8 buses maximum.

ECONOMY TOUR We like the addition of the Economy Tour as it gives a descriptive name to what many visitors already do when they ride one shuttle bus for their entire trip. We believe this would work well either as a separate system or combined with transit. However the name "Economy Tour" seems to cause some confusion so it may be less complicated to simply call it transit then advertise the option "to purchase self-guided tour materials" to enhance the trip. Additionally, day hikers may also want to purchase these materials.

WILDLIFE VIEWING SUBZONE 3 NPCA strongly supports the creation of this new management zone west of Eielson Visitor Center. This is in keeping with the telescoping nature of the park road, the road design standards and accurately reflects the current situation. As one travels beyond Eielson many things change and the experience becomes more primitive and intimate: the landscape is different, typical wildlife seen changes, the road narrows, and the park is quieter. Reflecting this change and preserving it with this designation makes good sense. Additionally, we recommend extending this designation a few more miles to the Old Park boundary.

KANTISHNA ACCESS Kantishna Inholder Access We recognize that ANILCA 1110(b) provides for guaranteed access to private property inside park boundaries for certain purposes. In the case of Kantishna, this access is predominately for the guests of and to support the overnight lodges in the area. It is not for day trips (see section below). Given this ANILCA guarantee and the need to have that guarantee be a priority, we are uncertain how capacity limits for traffic to Kantishna inholdings will be determined in the new plan. Specifically, how will the 1,360 number for yearly access to inholdings, as well as individual lodge allocations from the 1997 Frontcountry Plan, be incorporated? We suggest the allocation numbers from the 1997 plan be used as a starting point (minus day trips when they are transferred to a commercial authorization) and be included in the Superintendents Compendium where overall road capacity will be addressed. Then in subsequent years these numbers may be adjusted as needed using adaptive management.

Kantishna Day Use NPCA has long argued that day trips to Kantishna businesses are illegal because they are not providing access to their business, but rather are using the park as their business. As such, we support the Park Service's intent to change day trips from inholder access to commercial authorizations. Similar to all other vehicle

traffic, Kantishna day trips must operate within all indicators and standards and be governed by the limitations set by adaptive management.

In support of our contention that day trips should not be included in Section 1110(b) access, we offer the following legal analysis:

The National Park Service retains discretion in determining how to "reasonably regulate" access for Kantishna inholders pursuant to Section 1110(b).

Section 1110(b) of ANILCA guarantees access to private and State inholdings within conservation lands in Alaska but makes such access subject to reasonable regulations, as determined by the Secretary. The provision reads as follows:

Notwithstanding any other provisions of this Act or other law, in any case in which State owned or privately owned land, including subsurface rights of such owners underlying public lands, or a valid mining claim or other valid occupancy is within or is effectively surrounded by one or more conservation system units, national recreation areas, national conservation areas, or those public lands designated as wilderness study, the State or private owner or occupier shall be given by the Secretary such rights as may be necessary to assure adequate and feasible access for economic and other purposes to the concerned land by such State or private owner or occupier and their successors in interest. Such rights shall be subject to reasonable regulations issued by the Secretary to protect the natural and other values of such lands. (emphasis added)

ANILCA section 1110(b), 16 U.S.C. ' 3170(b). Importantly, the guaranteed right to access to inholdings is "subject to reasonable regulations." Id.

The phrase "shall be subject to" indicates that Congress affirmatively expected the Secretary to regulate access, and, as discussed below, the legislative history also provides support for this interpretation. The phrase "reasonable" grants significant discretion to the National Park Service to ensure that access to Kantishna does not adversely affect the values for which Denali National Park and Preserve were designated.

While the legislative history reflects intent to ensure access (see e.g. ANILCA Leg. Hist. v. 27, p. 475 (noting that Kantishna inholders "are going to continue to have access and they are going to continue to have the rights which we all agree they cannot be denied.") it also reflects that access would be regulated by the Secretary, and in this case the National Park Service, to ensure that the values of the conservation unit are not jeopardized by such access.

For example, in one House Report, it was noted that:

Although the Committee bill permits access to inholdings, the legislation authorizes the Secretary to regulate such access to ensure that it is carried out in a manner which is consistent with the purposes for which the conservation unit was established. The Committee does not believe that private land holders should have the right to cross public lands free of all regulation to protect such lands.

H.R. REP. No. 96-97, 96th Cong., 1st Sess., pt. II, at 157 (1979) (emphasis added). The Senate Report includes an even stronger statement supporting regulation of access to inholdings:

In this regard, the Committee expects the Secretary to regulate such access in order to protect the natural and other values for which the units were established.

S. REP. No. 413 at 249. The report recognized that if the Secretary does not promulgate adequate across-the-board regulations, he or she may be required to impose restrictions upon particular grants of access in order to protect affected conservation lands from damage.

In another House Report discussing the precursor to section 1110(b), which was section 1202 entitled "Access," the report went on to say that the liberal construction of the access provision should not be construed as preventing the Secretary from "adopting reasonable regulations concerning routes, modes, or frequency of travel which may be necessary to protect the natural and other values of the [CSUs] or to assure that the access provided under 1202(a) [general access] and the travel permitted under 1202(b) [customary modes of travel] will remain consistent with the purposes of the [CSUs]." H. REP. No. 95-1045, part I, 95th Cong., 2nd Sess., at 213 (Apr. 18, 1979) (emphasis added). The House Report also noted that access was guaranteed in order "to provide for travel which is not for the primary purpose of visiting or enjoying recreational use of a [CSU], but which includes a more or less extensive passage on or over the lands within such a unit" to get to the inholding. Id.

In a Senate Report concerning treatment of inholdings in Wrangell-St. Elias (which are much more extensive than those in Denali and were given substantial attention

during the crafting of the legislation) it was stated that

It is expected that the Secretary will cooperate with local residents, private landowners, and the State in the development of plans and the implementation of regulations to assure that development of and access to private lands within the unit is compatible with the purposes of this section [' 201(9)] and the quality of the experience of park and preserve visitors.

S. REP. at 160. There is no reason why inholdings in Denali should, or were intended to, be treated any differently. It is clear that Congress intended for the Secretary to regulate inholder access in a manner that ensured the access was compatible with the purposes of the CSU and did not in any way affect the quality of the experience of park and preserve visitors.

The access provision must be interpreted in a manner that is consistent with the Act's purposes and primary among these are protecting the natural resources of the designated conservation lands and preserving the subsistence way of life of rural residents. The "reasonable regulation" language must be read strictly given that allowing damaging access across conservation lands would not be consistent with the purposes of ANILCA. The legislative history of the access clause indicates that while Congress intended to ensure access to inholdings, it also intended to ensure that such access would not cause damage to conservation lands and the resources for which those lands were protected.

The "reasonable regulation" language places a significant boundary on the access guarantee of section 1110(b) and ensures that the guarantee of access will not be used to encourage inappropriate development inside conservation lands. An access guarantee is an important means of protecting inholdings from the restrictions on general public access that accompany the creation of conservation units; however, it does not create an affirmative opportunity for inholders to capitalize on the value of the new conservation lands that surround them.

We support the National Park Service's interpretation that ANILCA section 1110(b) in no way provides additional rights to inholders to conduct commercial activity within the park and outside the boundary of their inholding. See Draft Denali Park Road Vehicle Management Plan and Environmental Impact Statement (Draft Denali VMP and EIS) at p. 46. As the NPS indicates in both Alternatives B and C, the appropriate way to regulate inholder commercial activity, which clearly includes day trips through the Park, is through commercial use authorizations. Kantishna inholders are offering day trips to their lodges for lunch, where the majority of time is spent travelling to and from the lodge through the Park. See Draft Denali VMP and EIS at 106-107. It is evident that these day trips only exist because of the opportunity to enjoy seeing the Park, as each lodge day guest spends 80-90% of the day trip in the Park. Because these day trips rely upon the value offered by travelling directly through the Park, the inholders are conducting commercial activity in the Park. Consequently, regulating these daytrips through commercial use authorizations is the proper and appropriate way to ensure that park values are preserved.

TEKLANIKA CAMPGROUND ACCESS We do not support the time restrictions on travel to Teklanika campground and the phase out of vehicle access. Campers have previously been restricted from driving to all campgrounds west of Teklanika. Additionally they may only drive in and out once, and must stay a minimum of three nights. Teklanika provides a nice option for the elderly, the handicapped or families with young children all who greatly benefit from minimizing their time on a bus. This campground provides a wonderful, traditional park experience and we support the current system as is with no for further reductions.

PROFESSIONAL PHOTOGRAPHY NPCA recognizes the opportunity the park provides for professional photographers and we support that opportunity after accommodations for road traffic by 1110(b) inholders, transit, tour, and NPS needs have been met. We leave the specifics up to the professional photographers and NPS. We also support combining the professional photography and commercial filming programs to improve efficiencies in administration and oversight.

Thank you once again for the opportunity to provide our thoughts on this important plan. This plan has garnered a great deal of interest and passionate responses. It is heartening to see that so many people care deeply about Denali and are interested in its future.

Correspondence ID: 270 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Denali Education Center is pleased to submit comments on the National Park Service's current Draft Vehicle Management Plan. As a park partner, we appreciate the National Park Service's mission and the complex nature of preserving and protecting the park resource while providing access for all to enjoy.

Denali Education Center appreciates accessing the park as defined in our partnership agreement. Because we do not access the transportation system in the same way as the

general public or tour operators, we do not feel compelled to state a specific preference on any of the current plan Alternatives. We do, however, believe that "Alternative A: No Action" is the best alternative of the three proposed in the Vehicle Management Plan. In general, we believe that: the bus system needs to be simple so visitors can easily understand their options and make decisions based on their time availability and interests; the shuttle buses should be kept at an affordable price; the shuttle bus system should be operated with interpretive narration; and a vehicle limit on the park road should be considered to protect the resource.

We appreciate two important clauses in the section "Actions Common to all Action Alternatives": ? Educational programs provided directly by the National Park Service and Murie Science and Learning Center would have preference in available system capacity over commercial tours. ? Specialized tours, such as photography, geology, birding, and family friendly tours would be address in the operating plan of the concession contract, through regular park operations, and with park partners at the Murie Science and Learning Center." The ability to access the national park helps us meet our mission, which in turn meets the park's mission. Accessing the park is the key to understanding and enjoying the park, a necessary component of cultivating ambassadors for the park; people who are invested in its future. However, limiting access to protect the resource is vital.

Correspondence ID: 271 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I find the proposed EIS for a change in management of the Denali Park Road to be alarming and upsetting. As I read through the document I was confused and perplexed by the complexity and confusing aspects of the plan. How can NPS ever manage such a sophisticated scheme when I can't even find a park ranger to help me with a medical emergency? As a 22 year veteran of driving our marvelous road I am saddened by the possibilities that adaptive management could wreak on our Adolph Murie inspired wilderness character road. Are we going to move everyone onto a tour bus and do away with independent and hiker travel entirely? I must urge NPS to choose Alternative A: NO ACTION. The other alternatives are too vague and capricious to manage--there have been years and years of data that many NPS staff have admitted to me have languished in storage boxes without any data entry or analysis. I was part of a wildlife monitoring study in the early 90's only to find out much of the carefuly collected data may have never been utliized fully. I have watched staff come and go and virtually no monitoring of the bus system for over 15 years. Tim Karle was the last NPS employee that really rode the buses daily, visited rest stops and monitored the concessionaire and contractor buses--his last summer was 1994. I support the Denali Citizens Council's analysis of the plan. They have highlighted many key areas that are of grave concern to those of us that work on the road every summer. NPS cannot sustain nor support such a model as adaptive management. The vehicle limits must be maintained. The park concessionaire has eroded much of the visitor transportation system access by convincing travelers that the tour buses are a much better option. The ridership numbers clearly show how the concessionaire has managed to move visitors from VTS to tour. And why wouldn't they? They're a for-profit privately held corporation that's sole purpose is to generate profits for its shareholders. The assignment of the VTS bus system to the concessiionaire has adversely impacted public access to the park. Having one entity run both bus systems is a conflict of interest. This EIS does not even touch on this topic which it should to protect an economical and sustainable public access to our national park. The EIS ignores this reality entirely when it should be looking at how to split up the two bus systems, not morph them together. Park visitation has not gone up dramatically. The EIS only shows visitation back to 2005. That limited data is misleading. Here's what I found on the web and it's amazing to see that we are actually down almost 200,000 visitors since the park's peak in 1987 http://www.nationalparked.com/US/Denali/Visitation_History.php Alaska will always be a limited destination due to its distance and cost to travel to. I have watched wildlife sightings drop significantly over the 22 years I have driven the road. Why aren't we talking about that? We now have much bigger, heavier, noiser air brake diesel buses that severely impact dust and noise along the road corridor. We have no hourly limits on buses which many of us have suggested for two decades. How will NPS ever monitor the number of buses at a wildlife sighting? The large mammals are fleeing our industrial tourism debacle, rightly so. The road has become almost intolerable during certain hours of the day. I am so saddened by that loss. My record grizzly bear sightings were 29 individual bears on July 4, 1993. Now I'm lucky to see one bear. What is going on with the park's wildlife? It's disappearing. Please do not let this disaster go forward. If we do, will we then have 100 tour buses a day? Please use some common sense and stop this political nightmare from advancing. I have worked with many of you for two decades and know that you are an intelligent and thoughtful group of people. Resist the pressure that the Alaska delegation and the industrial tourism providers are placing on NPS. It's time for us to Occupy Denali and stop this debacle from ruining what little is left of Adolph Murie's vision.

Correspondence ID: 272 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Thank you for the opportunity to comment of the Draft Vehicle Management Plan and Environmental Impact Statement. Extension of the comment period is also appreciated. After reading the document numerous times, attempting to make some logical sense out of what is actually being proposed by the two action alternative I find myself more bewildered than enlightened. I have more questions to which I cannot locate answers within the plan and must confess to not trusting that NPS will be able to fulfill its obligations for either of the action alternatives. I am left no choice but to support the No Action Alternative A. While I do understand that being able to scientifically defend a road capacity number is desired, I fail to understand why there is a need to change the current capacity of 10,512 vehicles per season. I also fail to understand the overly elaborate suggestions in the two action alternatives yet the document gives little if no additional information on how exactly either of the action alternatives will be achieved. Where are the details? To be determined? This does not give confidence to the reader that the action alternatives are viable. I believe that a

quality experience for visitors can be achieved with the current road transportation system. The add-ons, combining tour and transit, economy tour, and other schemes would leave a visitor struggling with the paradox of choice. No matter which they chose, in the end the experience would be diminished by leaving the visitor wondering if they should have made a different selection. There is much to be said for simplicity, rather than attempting to satisfy each and every possible experience each and every visitor expects. The plan begins to address the issue of affordability, which overall is one of my major concern, yet you leave it hanging with "perceived value." It appears that "perceived value" is geared toward the out-of-state visitor who is booked on an Alaska tour which includes a visit to Denali. These visitors would tend to perceive value based on the overall cost of their entire trip not just on the portion which transports them into the park. However for the local resident or Alaskan resident wishing to explore their backyard perceived value would be very different. As a local resident myself I find the cost to access the park via the transportation system somewhat expensive. That's my "perceived value." My other concern is adaptive management and the standards and indicators. While adaptive management appears to be a viable management tool, at least on paper, I do not believe that in actual application it will be effective to manage park road traffic nor do I believe that it would provide action in a timely manner to address impacts to resources.

As an advocate of Denali National Park and member of Denali Citizens Council, I believe that protection of the park road character, the wildlife and wildlife viewing opportunities are paramount to decisions regarding the transportation system. Capacity determinations for the park road need to be readily comprehensible and enforceable. I know that a viable, affordable and enjoyable transit system can be achieved however I do not feel that this plan adequately covers these concerns.

Correspondence ID: 273 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: As a year-round local resident who has enjoyed Denali National Park whilst playing and working in a variety of positions since 1987, I should like to add my thoughts and comments about the Vehicle Management Plan...

The goal of this plan should concentrate exclusively on protecting the wildlife and its habitat, along with the road character, as advocated by the esteemed Adolph Murie who strongly believed that the Park Road should remain primitive.

All too often, the demands of the sometimes greedy tourism companies are put ahead of this goal, which subsequently leads to undue pressure on the animals that we all come to watch, photograph and enjoy.

It seems to me that many of the current Park Service "planners" have not had the privilege of living or working in Denali long enough to realize just how quiet our road corridor used to be, nor how the animals have been impacted by increased traffic on the road since those days. They don't seem to appreciate how Alternatives B and C would further pressure both the road and the animals. Just as an example, during my thirteen years of bus driving, I have noticed quite a decline in the number of animal sightings from the road west of Eielson Visitor Center. Many current Park Service maintenance people, and even more current bus drivers with many more years of service within Denali than have had, speak of the unwelcome changes they have witnessed in this regard over the years. Almost to a person, they endorse my feelings regarding the dreaded prospect of the implementation of Alternatives B or C.

During the Road Capacity Study, much emphasis was put on interviewing visitors to Denali Park to ascertain their opinions on their bus rides into the Park. In my opinion, their views are important but should not entirely influence the Park planners. The majority of these visitors have had but one bus ride into the Park so it stands to reason that their judgment may not be a true indication of what needs to be done in the future. Every day is different out there; every bus ride and, in fact, every driver is different, and these factors can drastically alter the opinion of each visitor.

The National Park Service has always advocated a "low impact" policy. The aim is to keep the wildlife and its wilderness wild. The greater the number of vehicles on the road, the greater will be the impact on the animals, their environment, and the road itself. We need to retain, or even decrease, the current seasonal cap of 10,512 vehicles on the Park Road.

Please keep Alternative A in place.

Correspondence ID: 274 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I am a 30 year resident of Alaska and have worked 4 seasons in Denali driving shuttle during the 1980's. I truly love the Park.

Denali offers a chance for "PEAK" experiences for visitors that they can find no where else. "I will never forget..." was a common quote I heard while people were watching wildlife.

The opportunity to have this extraordinary experience was very dependent on the character of the park road. In the past there were proposals to pave the road, to take it to regular "highway standards"!!! If that had happened, the experience would have been totally lost. We do not need another smooth and fast highway, or another Disneyland type scene. Denali National Park is UNIQUE.

To insure that Denali will be preserved for future generations, THERE HAVE TO BE DEFINITE ROAD VEHICLE LIMITS. Less is better for the protection of the resource for long into the future. The road and the Park have to be protected from commercial interests intent on their future income, NOT on the Park resource that is publicly owned and is a national treasure. Alternative B and C appear to be catering to the pressures for new hotel expansion. The Park and the Park road must have protection from industry and commercial pressure or it will rapidly deteriorate.

Alternative A would be my first choice.

Do not forget that for many years the SHUTTLE WAS FREE because it was access in lieu of private vehicles.

COLLARING animals definitely changed their behavior on the roads in my experience. You need to do less, not more.

HIKERS should not be afraid to get off the bus and enjoy the park on foot. There have to be open seats to accomodate hikers. NPS has to insure that a real walking experience can be enjoyed. The Park should not be just bus rides and expensive tours.

SHUTTLE NARRATIONS No, no, no. I do not want anyone talking at me on the shuttle. Let me experience the wonders of Denali without interpretation. You pay for it on tours, but I want silence on shuttles.

LESS BUSES, LESS TRAFFIC, MORE ANIMALS has always been my experience in the 300 times I have driven the Park road in 4 seasons. Denali National Park is a national park and resource and does not belong to commercial or visitor industry representatives who are thinking about THEIR income and their expansion interests.

The National Park Service mission is to preserve the resource. If planners bow to pressure or are worrying about their own career, the Park can be lost.

I choose Alternative A. A tighter bus limit has been developed over the years and is proven. Less buses provide a better and more impressive experience CONSISTENTLY.

Alternative A would be less expensive, and with federal money getting tighter, how could that not be the better choice? Alterative B and C would be years of uncertain numbers, more expenses, and undoubtedly more years of industry and political pressure to "open" the Park.

Please do not be pressured by business interests who in making money would destroy the Park. It is not the reason for the Park

I hope NPS will hold the road limit to current numbers or less. Please try to find the courage to preserve this wonderful Park, and do not let greed compromise your mission to protect.

Correspondence ID: 275 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Thank you, I think, for the ominous opportunity to comment on the Draft Vehicle Management Plan and EIS. And thank you also for the extension for comments which makes this possible for myself and others who are so occupied during the Denali summers to comment on this important and complex issue on the initial schedule.

While previous superintendents have commented on looking forward to working in a "simple park" with just one road, you know from experience the complexities which challenge management at Denali on ecological, wildlife, socio-economic and political levels with so many partners and agendas represented. Another previous park superintendent commented that you must be doing a good job when both sides on an issue beat you up as you seek to find the balance between use and preservation. I suspect that with all interested parties weighing in on the issue of transportation management, you may feel you are in a similar situation.

The document which seeks to propose management alternatives for the complex issue of park visitation to protect park resources is itself too complex to understand, without getting a PhD on the topic, and the outcomes of choices too uncertain, especially as relates to the visitor experience. I will trust that the NPS is fully able to manage for the benefit of wildlife and wilderness values.

With an interest in transparency and providing for resource protection, the visitors (not the industries that bring them to us) and the visitors' experience, I would favor the No Action alternative. In part I support the No Action alternative because a fixed, regulatory number of 10,512 as compared to a complex and expensive system of Adaptive Management (AM) which, because it has proven so nebulous, could easily become a line in the sand that can shift as the tides change.

I know you will be receiving much comment and input from knowledgeable and involved local employees, visitors, industry, from NPS and from other agencies, so I keep this short to a few random comments and concerns.

My concerns about the future of the wilderness, wildlife and the visitor's experience along this unique road relates to the incremental changes and loses to the Denali Experience. As little as 35 years ago, employees and visitors felt they were seeing something really wild as they traveled the Park Road. Despite the vast increases in the numbers of people, buses, upgrades and additions to facilities, many still feel that connection to wild-ness and what comes with it. Unfortunately, they don't know what they are missing and many don't notice the bit-by-bit loss from those incremental changes.

When road limits began for the bus system, there were only two bus systems: the "Tour" (Tundra Wildlife Tour or now the Tundra Wilderness Tour) and the "Shuttle" (VTS or "transit"). Kantishna traffic was not yet much of a tourist trade. The Denali Natural History Tour (DNHT) started as a 3-hour tour intended to serve as a pressure relief valve should the Tours reach their allocated limit. Since the most common comment on the WLT was that it was too long, tour operators began selling the DNHT to their clientele, many not realizing what would later be perceived as a downgrade from what they thought they were getting. The DNHT length has now expanded along with the price of the experience, affecting the affordability and profits of the service. Now with incremental growth in number and types of buses and tours, the feel and character of the Park Road, does not provide the experience it used to. Four porta-potties at Teklanika and Polychrome (now at Toklat) have grown to huge destinations for the masses.

The fact that the draft plan only includes 5-6 years as a history of use suggests that the longer view is not being considered. The longer view might suggest that even with the huge increases in visitation since the 1970's the number 10,512 has held to accommodate the growth, with efficiencies in ridership and operations, and more opportunities to experience Denali without meaning the full trip to Eielson or beyond. New trails and a visitor center in the entrance area, more activities in the entrance area, southside development planning and more tourism and park activities and destinations in the rest of Alaska are all intended to address further growth of tourism in Alaska. But Denali remains a target for anticipated growth and budget projections.

The Savage River Shuttle is a great opportunity for visitors wanting to get into Denali with access to trailheads, and views of the mountain and wildlife on those special days while not impacting the 10,512 number as it travels on the road open to unrestricted private vehicle traffic. It is the ultimate in freedom and affordability for an independent traveler.

Some projections point to greater levels of visitation, but the slump or slow down in growth may also just be an inkling of the future as Peak Oil and increases to the cost of travel impact future potential visitors.

In my opinion, Teklanika is not a destination, it is a rest stop with a nice view of the river. The DNHT was initiated as a pressure relief valve with the Primrose Ridge Turnaround as an acceptable level of impact to protect areas beyond. Some opposed it because it was seen as a wedge that would drive into the park to challenge the road limit system. A Teklanika Tour would be an example of that becoming true while not really adding to the visitor experience and no doubt impacting the affordability of park road options.

If there is a typical or average visitor, that person will likely ride at least a half dozen buses during their visit to Denali, to and from depots, hotels, meals, visitor centers, and

access centers, not to mention the bus that finally takes them into the park. More tour or transit options begin to add more confusion than value to time strapped visitors.

The tour options should not include stops at the Denali Visitor Center. Not only is it not the focus of visitors' getting on a bus to go into the park, those who really want to explore the DVC will feel cheated if put on a tour time limit. A good number of passengers may end up seeing a mandated visit to the DVC as just another rest stop.

Tour and (transit) drivers have for years been contributing to documenting wildlife sightings ? on a voluntary basis. Mandating that all drivers report sightings into an expensive on-board, technical system may only provide suspect data and add to the increasingly complex duties that are ?incrementally- added, especially to Tour.

I am concerned of the NPS ability to implement an Adaptive Management program in times of decreasing federal and park budgets. I think it is a good concept but that the 10,512 regulatory limit should be maintained, and evaluated under AM ? as can be afforded in line with other park needs ? to see if it can be adjusted upwards or should be adjusted downward.

The issues to consider and address are too many for me to weigh in on at this time. I have read the combined thinking of many knowledgeable individuals as represented by the Denali Citizen's Council (DCC) and support the type of thinking and recommendations for the draft plan from this group.

If this is a draft, I look forward to seeing a final management document that is more manageable to understand and that addresses the issues that will be raised about the draft.

Correspondence ID: 276 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Thank you for providing Holland America Line ("HAL") the opportunity to submit the following comments in response to the Notice of Availability of the Draft Environmental Impact Statement ("DEIS") on a Denali Park Road Vehicle Management Plan for Denali National Park and Preserve ("Park") issued by the National Park Service ("NPS") on August 1, 2011. Draft Environmental Impact Statement on a Denali Park Road Vehicle Management Plan for Denali National Park and Preserve, 76 Fed. Reg. 45848 (Aug. 1, 2011). As one of the largest provider of cruisetours to Denali National Park, HAL has a substantial interest in the revision of the plan.

I. Introduction

Denali National Park continues to be an integral component to the HAL Alaska CruiseTour program and is a key driver for our guests choosing to visit Alaska. We are proud to be celebrating our 65th year of bringing guests to the Alaska in 2012 and have for many years been the largest user of the Tundra Wilderness Tour product, having been a very early supporter of this longer, more comprehensive offering. Our variety of tour offerings allow guests to choose the best fit for their interests between the current Natural History Tour and the longer TWT. We believe retaining choice for visitors and maintaining or increasing the amount of tour availability while being mindful of minimizing impact in the park is important to both our guests and the Denali National Park management. II. Comments

A. HAL Generally Supports Alternative B

HAL generally supports Alternative B, and recommends that NPS adopt this alternative as the basis for its final vehicle management plan for the Denali Park Road. As described in the Draft Plan, Alternative B would combine transit and self-guided economy tour services onto the same buses. In addition, it would provide for the following guided premium tours: premium short (up to half-day) tours to Teklanika; and premium long (full-day) tours to destinations along the length of the Park Road, predominately between Teklanika and Wonder Lake. Draft Plan at 47-48. HAL believes that Alternative B would best provide for a transportation system that optimizes visitor access to and use of limited Park Road capacity and offers Park visitors a well-diversified range of tour and transportation options with different experiences and price levels.

B. HAL Strongly Opposes the Proposed Plan's Prioritization of Transit Over Other Transportation and Tour Options

HAL strongly opposes any effort by the NPS to prioritize transit over other transportation and tour services as part of the new vehicle management plan. The Draft Plan includes multiple statements that, in the event that transit buses are operating near capacity or that capacity on the road becomes limited, transit buses will be given priority and use will be reallocated to transit services from premium tour services and other transportation uses. For example, the Draft Plan states that "As described in actions

common to all alternatives, transit opportunities would be given priority over tour opportunities if a decrease was necessary . . . ." Draft Plan at 75, 76. And with specific respect to Alternative B, the Draft Plan states: "This alternative may require regularly reallocating buses between transit and premium tour services. It may also require reallocating use between the transportation system vehicles and other vehicles of the Park Road." Draft Plan at 48. A similar statement appears at pages 183-84 of the Draft Plan.

HAL respectfully urges that NPS not include any such prioritization of transit over other transportation and tour services in the final plan. First, there simply is no valid rationale for prioritizing transit, and, in fact, the Draft Plan doesn't suggest one. Indeed, prioritization of transit is not necessary'in order to ensure that visitors to the Park have a wide range of opportunities, at various pricing levels, to experience the Park; in order to protect Park resources; in order to ensure visitor satisfaction and enjoyment; or for any other reason. Instead, such a policy could have the adverse effect of reducing the availability of premium tour services for visitors who seek "an experience that offers guided interpretation, education, and visitor opportunities to understand and appreciate the park's natural and cultural resources." Draft Plan at 48. Such a result would be inconsistent with the Plan's goal to "provide a high quality experience for visitors," Draft Plan at 3, and Alternative B's objective to offer a "greater opportunity to have a park experience of choice," Draft Plan at 47.

C. HAL Believes That the Adaptive Management Framework Requires Further Definition

HAL believes that there are certain issues with proposed Adaptive Management and Monitoring Strategy that must be addressed in the final plan. HAL understands the Park's interest in adopting an adaptive management approach in the revised plan. However, HAL has several concerns about the proposed strategy that must be addressed to ensure that the adaptive management approach is implemented in a manner that does not negatively impact the entities that provide visitor services that are dependent upon use of the Park Road, or the ability of those entities to continue to provide those visitor services to the public.

The Draft Plan provides that, under Alternatives B and C, "sheep gap spacing would be monitored to minimize impacts on Dall sheep," and, "[b]ased on the results of the monitoring, management actions could then be taken to ensure that standards are met. Draft Plan at 57. The Park proposes an indicator that would require that a gap in traffic occur each hour for a minimum length of time. Draft Plan at 76. Specifically:

Milepoint 21.6 will have at least a 10 minute gap in traffic every hour with a 95% success rate (23 of 24 hours with gaps), averaged over 5 years.

No one year will have less than a 90% success rate (22 of 24 hours).

Milepoints 37.6, 52.8 and 60.6 will have at least a 10 minute gap in traffic every hour with a 95% success rate (23 of 24 hours with gaps), averaged over 5 years.

No one year will have less than a 90% success rate (22 of 24 hours).

Milepoint 68.5 will have at least a 10 minute gap in traffic every hour with a 95% success rate (23 of 24 hours with gaps), averaged over 5 years.

No one year will have less than a 90% success rate (22 of 24 hours).

Draft Plan at 80. "If trends indicate the standards for sheep gap spacing are or could be exceeded, the National Park Service would respond with a decrease in traffic levels as necessary. As described in actions common to all alternatives, . . . various management strategies could be used to achieve this. These strategies could include . . . changes to the transportation system schedule, removal of buses from the schedule, or stepping the system back to the level it was last operating at when not exceeding the standards. Any such changes would occur between seasons." Draft Plan at 76.

This framework raises several important concerns. As an initial matter, HAL is concerned that this framework would not provide tour operators and others whose business planning decisions depend upon Park Road management decisions sufficient advance notice of any changes to be made in Park Road management as part of the adaptive management process. Tour operators must make important marketing, scheduling, and other business decisions far in advance of providing service. In fact, due to the length of the cycle from planning to marketing to booking to providing the service, HAL would need at least two years notice of any dramatic changes in Park Road management in order to be able to adjust its planning decisions to take those changes into account.

The framework as described in the Draft Plan does not appear to recognize the practical business and operating concerns of companies like HAL that facilitate visitor use and enjoyment of the Park. In fact, however, adaptive management for sheep gap spacing could have important impacts on HAL's cost structure and retail pricing, tour scheduling and timing (e.g., departure times), and level of tour offerings. Accordingly, HAL urges that any adaptive management framework adopted as part of the final plan set forth a clear schedule for implementation that ensures that tour operators and other stakeholders can reasonably rely on Park Road management decisions and have sufficient advance notice of any changes in those decisions to make meaningful planning decisions.

HAL also is concerned that the adaptive management framework as proposed in the Draft Plan would give present and future superintendents too much discretion to effectively revise terms of the management plan under the guise of adaptive management. HAL believes that any adaptive management framework adopted as part of the final plan should impose further limitations on a superintendent's discretion by including more specific direction on the evaluation and interpretation of research and monitoring results and the determination of any appropriate adjustments to Park Road management in response to changing conditions. Finally, HAL believes that any adaptive management framework adopted as part of the final plan should expressly acknowledge that changes in sheep crossings and other monitored conditions can result from causes other than vehicle numbers and traffic schedules. Weather, climate change, and food source availability, for example, can each impact wildlife behavior. Accordingly, HAL urges NPS to make clear in the final plan that the Park will consider the potential role of other factors in causing changes to monitored conditions before determining that changes to the transportation system schedule, removal of buses from the schedule, or stepping back the system are necessary to respond to such changes.

Correspondence ID: 277 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: Letter
Correspondence:
Thank you for providing the Alaska Travel Industry Association (ATIA) the opportunity to comment on the Denali Park Road Vehicle Management Plan. This plan has monumental implications for the travel industry over the next twenty years and as a result, we have engaged the full range of visitor businesses, large and small, in a comprehensive series of meetings and discussions over several months to compose these comments. All ATIA members had the opportunity to contribute to the draft.

ATIA represents over 1,100 member businesses servicing the tourism industry in Alaska. Denali National Park and Preserve is one of the premium destinations for Alaska visitors and many of our member companies have products that in some way include this park. Since the experience of the vast majority of park visitors is in some way connected to the park road, your undertaking is of immense importance to our members. Our members serve a wide variety of park visitors from backpackers to budget travelers to premium tour passengers to patrons of the lodges in Kantishna. It is our sincere attempt with the comments within to acknowledge the right for the full spectrum of visitors to have experiences of the highest possible quality in Denali National Park and Preserve. Continuing involvement in the planning process for the Denali Park Road Vehicle Management Plan is a priority of our Tourism Planning Committee.

ATIA desires that tourism resources be developed in a prudent manner to assure long term sustainability of the wide diversity of tourism businesses, small and large. In so doing, we recognize the importance of remaining attentive to caring for the environment, the recognition of cultures and to Alaska's unique quality of life.

Introduction

IMPORTANCE OF DENALI NATIONAL PARK TO ALASKA'S TRAVEL INDUSTRY Since 1980, a vast area of land in Alaska was added to our national parks, preserves, and monuments. Now some fifteen park units encompass 54 million acres of Alaska. What has not changed in all these years since is this: Denali National Park and Preserve remains the only national park whose borders are accessible to Alaska's paved highway system and has a road providing access to its remote areas. Some parks have primitive roads touching their borders (Wrangell St. Elias, Gates of the Arctic, Kenai Fjords, Yukon-Charley) and some parks have limited primitive roads within them (Katmai, Wrangell St. Elias) and some can provide large and small boat access for large numbers of visitors (Glacier, Kenai Fjords), but no national park, other than Denali, has both highway access and a road penetrating into its interior. Add to this Denali's unique geographical position between Alaska's two largest communities and two largest airports (Anchorage and Fairbanks) and it is no mystery why Denali is still a critical component to the entire state's Tourism Industry, from Ketchikan to Barrow.

The tourism economy is critical to Alaska. Tourism is one of Alaska's largest industries and one of Alaska's largest generators of employment, with over $1.6 billion annual contribution to Alaska's economy. This does not include goods and services coming from outside the state. The economic importance of Denali National Park and Preserve to Alaska is tremendous. In an ideal world, increased access to Alaska's other national parks could take some pressure from Denali. The fact is, we don't see much evidence of this changing over the next twenty years. While we acknowledge that the unique resources that make Denali so special (the wildlife, the pristine landscapes, the unique ecosystems, the high mountain scenery) must be appropriately safeguarded, we

believe that the next twenty years should provide optimum access for the wide spectrum of visitors to Denali while attending to those safeguards. We believe the Denali

Park Road Vehicle Management Plan provides such an opportunity.

PUBLIC ACCESS TO NATIONAL PARKS TAKES MANY FORMS There appears to be an expressed bias by the National Park Service to maximize low cost, transit bus access for riders and that this is the preferred access mode of the general public. While we certainly acknowledge that a substantial amount of access must be guaranteed for the lowest cost transit riders and that a methodology must be present to make this type of access reasonably priced, we wish to point out that the general public actually chooses from a wide range of options for their visit to Denali National Park. These options include, and are not limited to, riding the Transit buses in an unguided fashion (both staying on the bus and getting off to hike); choosing guided, Premium Bus Tours because of the value added to the experience and/or as a part of a multi day package in Alaska; choosing a more interactive and small-group park experience by booking a trip with one of the Kantishna Lodges; and driving a car or RV to the park area to enjoy a camping experience. Please note that all of the above are park visitors and constituents of the "general public".

Alaska's parks are far north and remote: distance between parks and other protected areas can be expansive, wilderness conditions are ever present, wildlife dangers are always a potential, and the northern climate can be extreme, even in summer. Many Alaska visitors choose to visit National Parks in a tour or guided format in acknowledgement of the value added component in facing these barriers and challenges. Indeed, most of the first visitors to Denali National Park, as early as 1923 enjoyed a full-service, guided, and outfitted experience with horse transportation (later motorized) to Savage Camp on the Savage River. It is unreasonable and inequitable to assign a priority to one form of use of the general public without defining relative priorities of other forms of general public use.

LOW COST TRANSIT OPPORTUNITIES AND PREMIUM TOUR VOLUME ARE INTRINSICALLY LINKED, BOTH ARE ESSENTIAL, AND THEIR INTERRELATIONSHIP SHOULD BE ACKNOWLEDGED AND FORMALIZED. The Visitor Industry acknowledges the priority to provide access to Denali National Park and Preserve through a simple Transit bus system that is as affordable as possible to those who want to or can only afford to get access in this manner. Cost should not be a barrier to providing unique natural experiences in our national parks. However, it is broadly recognized that, in the current and any likely future contractual arrangement, reasonably priced transit service is not possible without a certain volume of Premium Tours. The price and volume of Premium Tours subsidizes the lower cost and less efficient occupancy (to facilitate hikers and campers) of the Transit tours. We believe this essential link between the two types of services should be formally recognized and empirically established. A desired volume of Premium Tours creates the condition where reasonable pricing of Transit service can exist. The latter cannot exist without the former. Our Visitor Industry Alternative proposes such a prescribed relationship.

Furthermore, since this plan considers management of the park road for up to twenty years into the future, it is paramount that the capacity of the various tours and Transit bus system remain somewhat flexible in order to adequately respond to consumer demand from year to year and over time. Arbitrary limits on any tours or forms of transportation that result in unused capacity of other forms are counterproductive for maximizing visitation to the park. This flexibility must be built into the plan.

Visitor Industry Alternative

EXECUTIVE SUMMARY OF VISITOR INDUSTRY ALTERNATIVE The Adaptive Management approach should be pursued, but the safety net of a Fall-back Plan should be included in case funding of the necessary research or other conditions make Adaptive Management unsuccessful.

The Visitor Industry prefers Alternative B, with some important modifications.

Transit service and the Self Guided Economy Tour riders would be combined into the same service (as they are in the existing condition) but not differentiated into separate products.

Guided Premium Tours would consist of a short tour to Teklanika (4= hours), Premium Long Tours to Toklat/Stony Dome (same as today's Tundra Wilderness Tours), limited Premium Long Tours to Eielson Visitor Center, and limited Premium Long Tours to Kantishna.

The allocation of buses to the Transit and Premium Long Tours would be linked in a set ratio that would only be altered temporarily from season to season to adjust to market demands.

With regard to Other Vehicle Use, the Travel Industry Alternative is in general agreement with the concepts presented in Alternative B.

Other Long Range Planning concepts are presented, consistent with our previous submission.

VISITOR INDUSTRY ALTERNATIVE

1. The Adaptive Management Approach and the Fall-back Plan. The Alaska Visitor Industry prefers Alternative B, with the important modifications specified below and with a built-in Fall-back Plan, if the Adaptive Management approach fails for any reason. We believe that the Adaptive Management approach provides more opportunity and flexibility compared with managing against a hard number of vehicles, as is currently provided under the 1986 GMP, and we support this approach. However, such an approach must be taken thoughtfully and with an appreciation of the park Vision Statement. Assessing wildlife fluctuations and behavior appears to be an imprecise science and fluctuations of behavior may be impacted by factors other than vehicle frequency, such as weather, climate, seasonal availability of food sources, animal to animal interactions, etc. These need be taken into consideration prior to any major changes to the transportation system. Indicators need to be weighted appropriately and the efficiency of vehicle utilization needs to be factored in as well.

Social science indicators of crowdedness also need to be assessed thoughtfully, as virtually all respondents would likely acknowledge preference for a more solitary park road experience. Sufficient checks and balances need to be incorporated into the decision process, so that changes responding to indicators would result in tweaks and improvements and not radical modifications. In addition, increased quality of interpretation, especially with the Transit service, would serve to enhance the understanding of visitors of the benefits and rationale of the bus transit concept in its relatively harmonious impact upon wildlife, as opposed to passenger car alternatives. This alone would result in more favorable results on visitor surveys and an enhanced appreciation for Denali's unique access system.

The Visitor Industry must plan ahead at least two years prior to operating in any given year and a certain level of volume and predictability is required. The current system has generally allowed for this and the new system must, as well. We strongly recommend that the new plan includes a provision where any reduction in volume of Premium Tours requires a two year advance notice, whereby the Visitor Industry can adequately plan for success. It would be extremely difficult and cause severe disadvantages to the entire Alaska Travel Industry if dramatic changes are made with less than a two year warning.

While the Adaptive Management is a progressive and positive approach to maximizing a full range of visitor experiences, without degrading the natural environment, it is not without issues. Here are the questions that this approach poses for the Visitor Industry:

a) Will Adaptive Management work in the long run? It appears experimental, complicated and is to be played out over many years.

b) Can the substantial funds to perform the necessary monitoring be assured?

c) Will unending experimentation and yearly tweaks eventually result in a system less efficient (less volume, less predictable) than the status quo?

For the aforementioned reasons, we believe a Fall-back Plan should be built into the New Vehicle Management Plan in case Adaptive Management proves unsuccessful or if the critical funding for the essential monitoring is cut to such a level to make the management plan unworkable. The Fall-back Plan would consist of the following:

a) The lessons learned from Adaptive Management, the data collected, and appropriate monitoring can be used to improve the system.

b) The vehicle limit should be the average of ALL vehicle usage during the peak three years of the last ten, inclusive of the DNHT and road construction traffic, plus a modest 10%.

c) The Fall-Back Plan would NOT have set limits on any particular type of service and this would allow flexibility to move allocations between service types.

The Fall-back Plan could be triggered by funding cuts or other conditions that make Adaptive Management unsuccessful. Alternatively or in addition, the Fall-back

Plan could be triggered by a five year review to assess the performance of Adaptive Management. Regardless of whether or not Adaptive Management continues to be implemented, we recommend a five year review of the plan to provide stakeholder involvement. 2. Transit and Self Guided Economy Tour. In our vision, Transit service and Self Guided Economy Tour riders would be combined into the same service (as they are in the existing condition) but not differentiated into separate products. The

Transit system would be adequately explained to provide both access for off bus experiences (camping and/or hiking) and for the most economical way to experience the park road, without departing the bus or any combination thereof. Optional interpretive materials could be made available to ANYONE who wanted them, be they campers, hikers, or stay-on-the-bus travelers. The same pricing scheme would be consistent whether you got off or stay on the bus and anyone could purchase interpretive tools to enhance their visit. Minimum but somewhat standardized interpretive messages would be provided by drivers without the intention of providing a fully narrated tour. Interpretive messages would include basic safety, park purposes and the rationale and benefits of the Vehicle Transportation System. The level of interpretation would be basic and minimal. In order for visitors to accurately distinguish between the Transit service and the Premium Tours, for the purposes of marketing this trip, it would not be described as a narrated tour.

We encourage pre-booking of the Transit buses while still setting aside sufficient capacity for independent travelers, who make their arrangements much closer to the day of departure. Perhaps up to 50% of usable capacity could be booked in advance. We encourage the design of a system, where visitors can also pre book the return trip from an intended point along the Park Road to assist with bus management on a daily basis.

3. Guided Premium Tours. Guided Premium Tours would consist of the following:

A) Premium Short Tour to Teklanika. The Premium short tour to Teklanika would be approximately 4 = hours in duration. These tours would be offered to designated locations throughout Wildlife Viewing Subzone 1 (Savage River to Teklanika). Topics and activities for the short tour would be standardized (i.e. wildlife, park history, wilderness) to increase operating efficiencies in training and marketing. Off the bus interpretive/interactive experiences would be conducted along the way. While each tour should have an experience of equal quality, it may be possible to include different "off-the-bus" interpretive experiences for different buses so bottlenecks are not created. For example, one bus may experience the living history cabin experience (similar to what is now in place for the Denali Natural History Tour) and another may experience a loop hike with interpretive staff and/or signage and exhibits. All tours could end with the option to visit the entrance Visitor Center.

There are several important goals of this trip: 1) to provide a short, quality alternative to the Premium Long Tours; 2) to provide a more in-depth park experience than is currently provided by the DHT; 3) to provide enough volume to reduce pressure from the more sensitive park habitat beyond for the next twenty years; 4) to help assure visitors take a trip that is best suited for them to increase the satisfaction levels of both the longer and short tours; 5) to maximize the use of the section of the road that is engineered best for volume while traversing less sensitive ecosystems than the road beyond.

For the reasons stated above, the Adaptive Management plan for this section of the Park may be more liberally applied.

B) Premium Long Tour. These tours would be offered predominately from the park entrance to Toklat/Stony Dome (7-8 hours), as they are today. The tours would start with a pickup at the local hotels or with a pickup at the Wilderness Access Center.

A limited amount of Premium Long Tours would extend to Eielson Visitor Center (9-10 hours). The daily quantity would be determined by the combination of market demand and facility constraints (capacity of the Visitor Center and parking at Eielson Visitor Center.

Premium Long Tours to Kantishna could be offered on a limited basis to meet demand, as they are today. However, if demand decreases in the years ahead and/or a growing demand exists for other Premium Tours, this tour should be eliminated, thereby allowing the day trips of the Kantishna Lodges to meet the remaining demand for this trip.

We believe, unless market demand dictates otherwise, the total of Premium Long Tours should equal or exceed Transit buses due to the fact the volume of the Premium Tours help keep the Transit service reasonably priced. The allocation of buses to Transit and Premium Long Tours would be linked in a set ratio that would be altered temporarily from season to season to adjust to market demands.

4. Creation of Transportation System Advisory Council We recommend the formation of a Transportation System Advisory Council or Committee made up of a wide range of stakeholders, including but not limited to a range of tourism representatives representing multiple segments of travel. This group could meet annually to review the system, review relative allocations of the buses over the various tours and transit service and recommend improvements. This same group could be involved with the five year review process of the Adaptive Management approach and also be involved, if there is ever transition to the Fall-back Plan as described herein.

5. Other Vehicle Use The Travel Industry Alternative is in general agreement with the concepts presented in Alternative B, with the exception noted below.

For the Kantishna Lodges, the current system works well. Each establishment has unique transportation needs, company culture, and operation. Transportation is part and parcel to the overall experience at the inholding and should not be consolidated. Flexibility should be provided to accommodate daily variances in volume and modest growth opportunity as appropriate and warranted.

6. Additional Comments TOUR ALLOCATION SYSTEM AND NPS ROLE It is very important for NPS to recognize the seat allocation, inventory control, comparable pricing and competitive marketing of tour products can be major contributors to the number of vehicles on the park road. Expanded tour choices, improved logistics, higher quality experiences and enhanced vehicles will not necessarily resolve current problems without enhancements in the tour inventory, pricing structure and allocation system. For this reason, we believe NPS must take a more active role in managing the transportation contract, after it has been let.

All tour companies should have a fair playing field in receiving tour allocation. If an allocation system is necessary, it should be addressed in a manner that is flexible and transparent. Industry involvement in designing such a system should be sought prior to putting the specifications of such a system out to bid. In addition, once the transportation service has been contracted, an annual review by NPS and stakeholders to consider improvements should be conducted.

The current inventory, tour pricing and reservation processes often do not accommodate the choice of the individual visitor, within a tour program, in an efficient manner. Tour operators and packaging companies are unable to receive block for all park tour and VTS options. This creates an inflated demand on the longer tour seats,

thereby potentially increasing the number of vehicles on the Park road unnecessarily. In the event of the availability of two or more high quality and premium priced tour options of varying lengths, such as proposed in this document, an improved inventory, rate structure, and reservation system to accommodate limited individual choices of the visitor should increase the quality of the visitor experience and decrease the number of visitors taking a trip not best suited for them. Allowing a limited number of passengers to change their choice with short notice could also be considered, if the inventory system will also help in managing these options effectively. The future concession agreement should include a rate structure that allows for qualified park "Tour Re-Sellers", who provide the widest marketing value and distribution such as package tour operators and wholesalers, as well as to "Point-of Sale Resellers" such as qualified area hotels and travel agents. The travel industry typically has an established commission structure that will reward Re-Sellers for marketing and booking any premium tour that is the most suitable for the clients' interest, allowable time, and budget. The industry standard is 20% discount for qualified wholesalers and 10% for qualified travel agents off of the "Rack Rate" pricing that is established by the National Park Service and/or the Concessionaire. The Premium Tours and the Transit service should be commissionable on this basis. As mentioned previously, perhaps at least 50% of the capacity of the Transit buses should be allowed to be pre-booked under generally acceptable industry terms. This would eliminate the eight seat limit and would not require the inclusion of specific names at the time of the initial booking. However, we acknowledge the importance of setting aside sufficient capacity for booking near or on the day of departure to meet the needs of independent travelers. Lastly, the tour mix and respective capacities should be evaluated regularly to ensure tour mix is meeting visitor demand. As the industry evolves over the next twenty years and passenger expectations shift, there must be flexibility to respond to the market.

NOTES ON ROAD SAFETY Every effort should be made to improve any section of road where basic safety is a concern. Safety should take priority over managing for a "primitive road experience". An extra 6-10 feet of road width around a narrow curve will not be viewed as "less wild" or "less primitive" by park visitors. The visitor industry would welcome the opportunity to propose specific areas for road improvements.

Since our alternative contemplates a high volume Premium Tour to Teklanika that may involve larger and more comfortable vehicles than those which traverse the entire length of the road, it will be important that the first thirty miles of the park road are engineered properly for the volume and vehicle size anticipated.

BEST STEP FORWARD FOR TWENTY YEARS The Travel Industry takes seriously the opportunity to plan for the next twenty years. Once a transportation concept has been developed, we recommend the Park Service convene an unbiased team of experts, composed of consultants with extended experience in visitor services, logistics and interpretation both inside and outside of the Park Service and inclusive of professional tour providers. Every opportunity should be taken to provide for the highest quality visitor experience possible and "out of the box" thinking should be welcome. The public and the visitor industry should have an opportunity to provide input in the process. The funds necessary for thoroughly examining options to enhance the quality of the visitor experience would be well spent. PREPARE FOR CAPITAL AND OPERATIONAL EXPENDITURES While we realize that it is not within the parameters of this planning process, to truly enhance the visitor experience in Denali National Park, we believe it will be necessary to think beyond vehicles and vehicle logistics. Over time, capital and operational expenditures will be necessary for parking improvements, visitor centers in key locations, improved rest stops in key locations, trails, interpretive staffing, covered/enclosed gathering and dining areas and road improvements. Such improvements can be phased in over time and may include:

? Parking and turnaround areas enhanced as needed at Teklanika and Eielson.

? Covered and heated pavilions or areas provided for sitting or dining at Teklanika, Toklat and Eielson. In addition, "take in/take out" of foods with each bus may be appropriate, but the possibility of beverage and/or provision of simple snacks, beverages and meals should be considered. Visitors need space to get out, move around, have contact time with the

? Park and have a pleasant dining experience rather than be expected to get by on a "snack" eaten uncomfortably on a bus.

? A substantial Visitor Center at Teklanika, as well as an amphitheatre for interpretive presentations. This may be best placed in an area separate from the Teklanika rest stop that services Transit and Long Premium Tours.

In closing, as the planning process continues, we look forward to working closely with the National Park Service to ensure that the final plans provide a wide range of the highest quality experiences for visitors to Denali Park and Preserve while protecting the unique resources that make the Park a rare and special place.

Correspondence ID: 278 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: As I was unable to give comment through the website for some reason, I would like to do so here. Alaska has been my home for 32 years, with Denali National Park at its center. I was married in the Park and have visited there at least once annually, often using the bus system to access the back country. During my first years, filling the parking lot near Riley Creek and the old visitor's center occurred infrequently. The area north of the Park entrance remained completely untouched. All of that changed in the early to mid-80's, when Princess Tours attracted vast numbers of tourists and Denali's capacity burst at the seams. My main concern in regard to the Park road is that added traffic will adversely affect wildlife. I suggest that no change be made to the current plan and that both entrance and bus fees be frozen until the economy makes a marked growth spurt. While I appreciate the added demands increased tourism has placed on the park road in recent years, I want to provide the perspective of the Alaskan resident whose interests are being replaced by those with profit-driven motives. Frankly, I think the Park would benefit from "employing" personnel (in concessions, especially) more knowledgeable than the summer hires from Outside who know little about the Park or Alaska. Surely, a well-organized staff of qualified volunteers could lower costs. Who wouldn't want to spend some time working in one of the most magnificent places on earth, giving back to their country in a unique way? There is much to say about this Alaskan gem called Denali, and I appreciate the opportunity to give feedback. The bottom line is the Park's wildlife cannot sustain increased traffic and remain wild. Let's take the courageous step of affirming this through our actions, decisions, and intentions.

Correspondence ID: 279 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: The following comments regarding the draft vehicle plan arise from my and my family's numerous visits to Denali National Park & Preserve (DNP) over the last 30 years (my first visit to the park was in 1981) and from my acquaintance with the issues that have challenged the Park Service and in particular DNP officials over these decades. I was a NPS Volunteer in the Park in the summers of 1986 and '87, when I worked as operator of Kahiltna Base Camp. In each of those summers, I participated in climbs of Denali (Mt. McKinley). As a reporter for the Anchorage Daily News (1981-2007), I covered and wrote about an array of important DNP issues including park access, park development, mountaineering in the park, wildlife viewing, wildlife research, snowmachine access, limits to visitation, the late-summer DNP Road Lottery, poaching of wolves, and the winter sled-dog ranger patrols. From 1993 through 2003, my family and I visited DNP on the north side of the Alaska Range every summer but one. Our visits always began with our camping at the Teklanika Campground (tent camping at first, RV camping later), where our stays were generally 5 to 8 days long. From Teklanika, using our bus passes, we always ventured deeper into the park. At first, because my daughter was only 5 years old when we began in 1993, we stayed on the bus but still managed to climb the hills behind Polychrome Pass. Keep in mind that we did this with my daughter and a friend, both 5 and 6 years old. At times we visited the park with other families with children, always camping at Teklanika. By 1995 or '96, we were signing up for "Disco hikes," the incredibly generous ranger-led Discovery Hikes open to any park visitor, and thereby climbed several of the wonderful mountains adjoining or close by the park road. By the late '90s, we decided that we already knew enough about scrambling in the hills near the road and we ventured off the bus on our own. In the last few years, we climbed peaks on both sides of Igloo Canyon and in back of the Eielson V.C. During this entire period, we always traveled on the green "shuttle buses," the Visitor Transportation System. I provide this background to try to convey to NPS and DNP planners that there are few aspects of managing this great natural wonder that I do not have at least some minimal acquaintance with. In regards to the draft plan, therefore, the only option I can accept as presently written is Alternative A, which retains the status quo. I cannot support any alternative that would eliminate private vehicle access to Teklanika--i.e., access by RVs and smaller vehicles that remain parked at the Tek campground. Alternative B would do so, even though it would occur in increments or in phases. The pleasures of Teklanika are manifold. Older visitors and those with young children need a means of entering the deeper zones of the park (i.e., Tek) that doesn't involve tents. RVs, which have long been accepted at Tek, provide this opportunity. I cannot support any plan that would increase overall vehicle

traffic on the road. The impact of such traffic on wildlife has been documented. I support Alternative A because it appears that the present limits on both private vehicles and buses are well balanced for the time being. I support Alternative A because neither of the other Alternatives provides any suggestion or proposal that fees for bus travel must not rise. In the last 15 years or so, entrance and bus fees have risen to the point where a visit to ?DNP is becoming a major vacation expense for families without means. DNP should not be a destination that only those with ample means can afford. If it were up to me, I would prefer fewer "Wildlife Tour" buses (managed by the concessioners or tour companies) and more "shuttle buses," which cost considerably less and provide the all-important chance to get off the bus almost anywhere the visitor's boots have a yearning to walk. I believe that neither Alternative B nor Alternative C offers any commitment to the shuttle-bus system (the VTS). I also believe that Alternative A better supports visits by Alaskans, those who visit the park without a whole day to wait for a seat on buses that are headed out into the park filled with package tourists. Denali National Park is universally regarded as a treasure of natural, spiritual and recreational values. The NPS enabling act and subsequent laws and regulations codify the need to provide for the common use of this resource while also ensuring that the park is preserved AS IS in perpetuity. Therefore, I urge the planners to go slow. Take no further departure from the present status quo, Alternative A. If time shows a need for reasonable change to existing visitation and visitor-transportation policies, planners can make prudent changes to the existing vehicle management plan.

Correspondence ID: 280 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I would like to support no change in the DENALI road plan. I think the Alaskans and fellow independent travelers should not , in the long run, be bumped by the packaged tour company's and concession's high profit wildlife tours

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Correspondence ID: 281 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: It wasn't that long ago that the management focus at Denali trended toward managing the people, for the benefit of the wildlife and their habitat. That idea ultimately benefits the people as well as upholding the concept of an intact ecosystem with it's inherent wilderness values. Since arriving at the park in 1984, I have witnessed numerous challenges to continuing that style of management, but thankfully there are many concerned citizens to voice their opinions in defense of preserving the character of this remarkable park.

In considering the options put forth for the VMP, I believe there are flaws in options B and C significant enough for me to support plan A.

I believe Plan A would be improved with the following additions: -I support having self guided material in a variety of languages available to check out or purchase on the VTS system. -Management zoning approach of alternative C -Professional photography / filming approach of alternative C

Some of my concerns about the other options are as follows: -The multitude of bus configurations is too complicated -Unless the foot travel of "off the bus" experience is only on gravel riverbeds, I believe that trail development will be unavoidable...leading to more "nodes" of development. -Through my experience as a tour driver for 19 years, I know that although buses currently leave the East end at spaced intervals, wildlife sightings change this spacing. Buses see different things, and it would be a shame to force a "stop and talk" just to create space and then when the opportunity arises for a unique (or even spectacular) sighting, the time is no longer available due to the contrived stop. -It was always feared that the DNHT would be the start of a "wedge" of traffic into the park- options A and B make that fear a reality. More "clogging" farther into the park. -I think tour and transit should remain segregated. -Trips into the park are long, and I believe there is plenty of time to address specific interests rather than creating a dedicated trip for birding, etc.

I feel that I am being pragmatic about my opinions, and question the ability to manage the myriad of choices. The current system was deliberated over by many serious folks, and maybe a little tweaking would be beneficial...but it is not necessary to be everything to all people. If visitors can adequately access information about the current system, understand their options and grasp the wilderness character of Denali, then a powerful trip is definitely possible.

Correspondence ID: 282 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I have worked at the Murie Science and Learning Center for Alaska Geographic for four summers and currently reside in Fairbanks AK. I would like to suggest that neither of the actions that change the current workflow of vehicle management be adopted. Though there are flaws with current course of action, I feel that the Denali Citizen Council conveys an overarching message that echoes my sentiments.

"Both action alternatives in this plan make the determination of Road Capacity too flexible, too vulnerable to manipulation, too confusing and academic for the public to readily understand, and too expensive over the long run."

I have been involved in political process from the age of 15 and feel that this plan fits with many I have seen that are full of loopholes and semantics that make understanding difficult for the people that are most likely to be subject to the changes. I am not saying that the readers and audience are not intelligent. I believe that your document is rather inaccessible, perhaps bordering on offensive to the process of public involvement.

In regards to the potential action plans- they are too flexible, manipulative, and confusing. I recognize, and took advantage of, public meetings but overall feel that they were not helpful in deciphering this document.

Yes, my comments are vague, but I would like to speak to a more pervasive root problem that will prevent the best of options from succeeding. This is the atmosphere of contempt, denial, lack of compromise, distrust, and dissolution of community that is occuring in Denali National Park. The relationship between National Park and concessionaire, Doyon/Aramark, is completely toxic. I lay blame on both parties involved though am far more aware of the effects of this toxicity on the employees of this corporation. I understand that concessionares fulfill jobs that the parks do not have time for (or don't want) but the current supervisors and many other employees have created a true culture of fear, retribution, cynicism, and greed. It nearly disgusts me to know that the Park Service has faith that this corporation is justly portraying the 'American experience' and legacy of our National Parks. I suggest that the larger issue of this park partner poisoning our waters ought to be addressed promptly.

No plan, no matter how brilliant, can succeed as long as the aforementioned culture continues. Please do not distract the issue by making changes to the plan and dedicate more effort to mending this broken and tormented relationship.

Correspondence ID: 283 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I would like to comment in support of the Denali Citizen Council (DCC) Alternative as presented in their comments on the Vehicle Management Plan EIS and request that the NPS engage in a Revised Draft of the EIS. DCC has presented an excellant rational for both the alternative and the need for a revised draft, and I fully support their justifications. The responsible and conservative concept of retaining the current limit while incrementally transitioning to an expanded description of the indicators and standards was repeatedly presented to the NPS at many stages in this process, both internal and external. It is regrettable that it was not developed as an alternative. This would have ultimately have strengthened the process and any final decision. The decision to reject the type of alternative as proposed by DCC was based more on hubris, egos, arogance, and personal desires to somehow prove a point or show off to others the use of the VERP process rather than really stepping back and looking at what might be the best way to implement indicators and standards for the protection of a valuable public resource. I hope the NPS decision makers will take the very well thought out comments of DCC to heart and revise this EIS with a stepwise implementation process that still retains the clarity and protection of a regulatory numeric limit until there is actual multi year data that shows how the selected indicators and standards are really capable of protecting on the most important wildlife viewing opportunities in the world.

Correspondence ID: 284 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I very strongly oppose Alternative B (Optimizing Access) for the following reasons: 7 Alternative B does not allow for easy access for hikers and backcountry users. The decision many years ago to limit park road access to buses only was made to limit impacts by individual vehicles and limit traffic, and was not meant to limit access of individuals to the park. However, Alternative B does limit access to the park by those individuals who wish to experience more of the park than just looking out of the window on a bus. The transportation system is the only way to access the park; therefore it must be managed so that it is inclusive to all park visitors. 7 Lack of camper buses. The plan states that "strategies would be explored for carrying recreational equipment (e.g. backpacks, camping gear, bicycles, etc.) on the exterior of the buses". This is flawed for a few reasons: o Alternative B limits carrying capacity for campers and backcountry users. o Anyone who has seen a bus after miles of riding on the park road will realize that camping gear and backpacks will be in poor condition when they arrive at their destination if carried outside the bus. Who wants to start a multiday backpacking trip with gear that has been soaked or covered in dust/mud from riding on a bus? Or invest in expensive dry bags to keep their groceries dry for their trip to Wonder Lake Campground, when currently a cardboard box will do? o Alternative B plans to make Teklanika a bus access campground. Alternative B greatly increases the volume of campers needing a bus ride to their campground while at the same time cancelling the bus service that is supposed to serve this campground. 7 Teklanika campground. Alternative B phases out the ability to drive to Teklanika campground. As someone who has stayed in Teklanika campground the past two years I feel this would be a huge mistake. Teklanika allows senior citizens, those with disabilities, and those with small children the opportunity to have an overnight experience in the heart

of the park. Without the ability to drive to Teklanika campground only young, healthy individuals who are able to carry their gear into the backcountry or haul all of their camping gear onto a bus and then to a campground would be able to enjoy a night spent in heart of the park. The goal of the National Park Service is to be as inclusive as possible; this decision is a move to exclude a large percentage of visitors from the opportunity for a quality park experience. 7 Adaptive Management. I oppose adaptive management of park road access. There are not enough resources currently available to properly gather all of the required information needed for the park service to make informed decisions on adaptive management, and with possible decreased federal budgets in upcoming years this problem will be become worse. In addition adaptive management is a very subjective process that will be easily manipulated by political influence instead of taking into account what is best for the park. 7 Increased barriers to local community members. As a resident of Talkeetna, Alaska I am a short drive away from the park and enjoy visiting the park a few times a year. I feel that there are already many barriers to entry into the park for visitors: high cost of entry fees, high cost of bus service, and need for reservations for bus and backcountry access. Alternative B only increases these barriers. While the visitor from outside the state of Alaska may only come to Denali one time and so extra cost and hassle are not a big consideration for their "once in a lifetime experience", those of us who visit the park on a regular basis cannot bear these extra costs and hassles of advance reservations. 7 The main party that will benefit from this plan will be the transportation concessionaire, not the public. This plan creates a system that maximizes concessionaire profits at the expense of a quality visitor experience. I strongly support Alternative A: No Action (Continuation of Current Management) for the following reasons: 7 Alternative A allows for easy access to the backcountry and hiking opportunities. 7 Alternative A provides low cost options for accessing the park, which is especially important for those of us who live close to the park and visit many times a year. While the visitor from outside the state of Alaska may only come to Denali one time and so extra cost and hassle are not a big consideration for their "once in a lifetime experience", those of us who visit the park on a regular basis cannot bear the extra costs and hassles of advance reservations in Alternative B. 7 Teklanika campground. Teklanika allows senior citizens, those with disabilities, and those with small children the opportunity to have an overnight experience in the heart of the park. Without the ability to drive to Teklanika campground only young, healthy individuals who are able to carry their gear into the backcountry or haul all of their camping gear onto a bus and then to a campground would be able to enjoy a night spent in heart of the park. The goal of the National Park Service is to be as inclusive as possible, Alternative A does this. I do not support Alternative C (Maximizing Visitor Opportunities) for the following reasons: 7 Adaptive Management. I oppose adaptive management of park road access. There are not enough resources currently available to properly gather all of the required information needed for the park service to make informed decisions on adaptive management, and with possible decreased federal budgets in upcoming years this problem will be become worse. In addition adaptive management is a very subjective process that will be easily manipulated by political influence instead of taking into account what is best for the park 7 Increased barriers to local community members. As a resident of Talkeetna, Alaska I am a short drive away from the park and enjoy visiting the park a few times a year. I feel that there are already many barriers to entry into the park for visitors: high cost of entry fees, high cost of bus service, and need for reservations for bus and backcountry access. Alternative C will increase these barriers by increasing costs for the transit option and potential increases in the cost of economy tours. While the visitor from outside the state of Alaska may only come to Denali one time and so extra cost and hassle are not a big consideration for their "once in a lifetime experience", those of us who visit the park on a regular basis cannot bear these extra costs and hassles of advance reservations. The transportation system is the only way to access the park; therefore it must be managed so that it is inclusive to all park visitors. 7 I do like several things about Alternative C, and would support it my concerns above were addressed: o Teklanika campground. I think it is important to keep Teklanika campground as a drive in option that will allow those physically unable to haul their gear to and from a bus to experience a quality overnight experience in the heart of the park. Alternative C makes a good compromise between keeping this camping option open and reducing traffic flow during peak periods. o Emphasis on providing flexible options for visiting the park.

Correspondence ID: 285 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Thank-you for the opportunity to comment on the latest version of the Denali Park Vehicle Management Plan. I really appreciate how the Park Service listened to the travel industry during the last round of planning. You incorporated some of our ideas into Alternative B of the Vehicle Management Plan. I strongly support Alternative B because it preserves the wildlife experience and allows the maximum number of visitors to visit this great wonder. The new short tour to Teklanika will enhance the short tour experience (former DNHT) and will be a complete tour for many visitors. Please leave this as a reasonable price tour that is around 4 hours long; do not stretch the time with other mandatory interpretive programs. At the conclusion of the tour allowing a stop at the Denali Visitor Center would give the guests the choice to add on other interpretive experiences on their own. Once the numbers increase on this tour in 10 or 20 years it would be nice if a study was done to allow higher density articulated or double decker buses on this tour to increase capacity. Decreasing the number of camper vehicles to Teklanika along with less professional photographer vehicles and park service vehicles we believe the increase of seat capacity is warranted and will not negatively impact the animals. Alternative B allows for an increase over time if the Adaptive Management System studies supports it. As a starting point the base number for the first year of visitors should be higher for the longer tour due to current experience. On page 309 (Appendix D) for Alternative B the longer tour has a starting seat capacity of 124,006. When I look at page 93 the longer tour (Tundra Wilderness Tour) had 127,668 guests travel on the tour in 2007. We believe that the quality of the wildlife experience today is good and do not understand why the base number in Alternative B for the long tour is less than the actual 2007 usage. Also in Alternate B there is discussion for reducing the number of professional photographer permits and reducing the number of park service vehicles in this zone so I would think that increasing the seat capacity in the long term tour base would be appropriate. 1 professional photographer permit equals 52 seats on the long term bus times 108 days equals 5,616 additional seats. With the photographer and park service vehicle reductions we believe the base number for the long tour seat capacity should be 150,000. The Transit base of 113,184 (page 309) could also be lowered to 100,000 which is still over the 84,590 (page 93 in 2007) used in the highest count year. In your Adaptive Management Plan you talk about an annual review of the vehicle impact. We worry is that you are intending to put the burden of the necessary research on the motorcoach concessionaire which means the research cost will be borne by the consumer using the bus tour and

transit system. Too much expensive research will increase the bus operating cost. We recommend spreading the research over a few years in order to keep the cost per year in a reasonable range. Beginning on page 147, this plan talks about the regional impact on Alaska. It only talks about the effect of bed tax on the Denali Borough and not how this affects the whole state. The travel industry in Alaska brings over $1billion dollars of economic impact to our state. Almost all land tours in Alaska include a visit to our jewel, Denali National Park. Without access into Denali National Park the whole industry could be limited in Alaska, this is a much larger impact than just a small bed tax in Denali. Denali can become the limiting pinch point of Alaska tourism. Another area where we feel this plan is limited is in its scope, is restricting the analysis to Denali only. Over 50% of the US National Park land is in Alaska, which is Alaska's biggest marketing feature for visitation and tourism. Access is not available to most of the National Parks via roads. Kenai Fjords, Glacier Bay, Gates of the Arctic, Katmai and Wrangel-St. Elias don't have good road access. Really, the only National Park in Alaska with good road access is Denali. From a statewide analysis of National Parks it only makes since to choose Plan B which allows significant growth in access to Teklanika in Denali and stable access beyond that point to Eilsen, Unless you are wealthy and can afford to fly in or boat into the National Parks of Alaska, Denali is the only National Park the common man can have access to. Thank-you for the opportunity to comment on the Denali Vehicle Management Plan which is so critical to the State of Alaska's travel industry.

Correspondence ID: 286 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Thank you for the opportunity to comment on the Vehicle Management Plan and EIS, and additional thanks for responding to the many requests for an extension of the comment period until October 31. In responding to a document as complex as this one, the extra month was greatly appreciated.

However, after the days of studying the plan and attending multiple meetings and discussion groups, I'm not sure any amount of time would have allowed for true understanding of all the subtleties of these proposed changes. My suspicions have been confirmed by private and public correspondence with NPS officials who have, I do not doubt, a solid and complete grasp of the science and policy details, but whose explanations often boil down to "it's too complicated to explain; just trust us." I trust that intelligent, thoughtful people put genuine and well-meaning effort into developing the alternatives. I do not trust the attempt to communicate those ideas, and because of these many unanswered, and perhaps unanswerable questions, I can only voice my support for Alternative A, no action.

I support the effort to replace the 10,512 limit with scientifically defensible standards, and feel the work done to create standards by which this limit will be defined is important and valuable. I am dubious, though, of the nebulous explanation of "managing to a standard, not a number." There will always be a number, whether it is labeled or not, and given the pressures put upon NPS by the tourism industry and other entities, I strongly believe that a limit must be defined and enforced. This is not simply a distrust of the methodology of adaptive management; I appreciate NPS's interest in applying a scientific standard to road management, and in allowing for some degree of flexibility in the numbers and types of vehicles allowed on the road as we continue to learn more. But as outlined in this plan, if negative impacts warrant a reduction in vehicles, the infrastructure is not in place to respond to those impacts. I don't feel that it is a safe option to assume that visitor numbers will remain low and vehicle numbers will remain well below 10,512 for the first several years of implementation of any proposed change. I fear for further damages to the already tenuous grasp on the "Murie Vision" of the Denali Park road. Alternative A is the only option in this plan in which a concrete limit is retained.

As described in the plan, transit is given priority in all alternatives. The logistical gray areas of what this prioritization might look like are enough for me to oppose outright the proposals in Alternative B, which combines tour and transit users on one bus. The loss of the designated camper bus would, I believe, mark a final step away from what once made the Denali backcountry experience so unique. The many details that are yet to be worked out in order to implement the changes proposed in Alternatives B and C leave me with a sense of deep confusion as to why these changes are proposed at all. Though it is by no means perfect, the current transit system provides efficient access to backcountry users, and Alternative A is the only proposal where that access is coherently preserved.

I recognize that the transportation system at Denali is quite different from that of any other National Park, and commend NPS for their creative responses to the challenges this inevitably presents. However, I don't believe that these challenges are a sufficient reason to avoid defining "affordability" of transportation costs, and relying instead on the unstable measure of "perceived value" in order to determine whether the affordability standard has been attained. National Parks are and always have been a refuge primarily of the more comfortable classes; however, a plan that truly guarantees affordability would take into consideration the local and regional population, many of whom live at very low income levels, for whom cost of a trip into the park is very definitely prohibitive. The federal government manages to define poverty levels and low and middle incomes; surely there must be a mechanism to calculate affordability that addresses people other than out of state travelers who can afford to spend large sums of money on travel.

I understand that there is a common knee-jerk opposition to change, and that much of the opposition to this plan undoubtedly stems from that opposition. But for many of us who are deeply invested in this place, our wariness is rooted in our sense that without constant vigilance, the assurances made in proposals like this go by the wayside in the face of budgeting realities, political pressures, and diminishing interest. When I first came to Denali in the summer of 2004, I was impressed with the park's relatively

minimalist facility development within its boundaries. As is the case with anyone's personal status quo, those conditions soon changed, and I was disappointed to see the erection of the giant eyesore at Toklat. I was comforted, though, with the assurance that it was temporary; and yet, more than six years later, the tent remains. This is only one example.

I hope that NPS will be fully accountable for whatever changes might be implemented, rather than rely on the failure of the public's short term memory. But because I am unconvinced by the necessity, clarity, and feasibility of the proposed changes at this time, I support No Action.

As a board member of Denali Citizens Council, I support the comments made on behalf of the organization as well.

Correspondence ID: 287 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: The Citizens' Advisory Commission on Federal Areas reviewed the Denali Park Road Draft Vehicle Management Plan and Environmental Impact Statement. We offer the following comments for consideration in finalizing the plan to manage traffic on the park road.

Vehicle Use Levels The draft plan asserts that while the existing seasonal limit of 10,512 vehicles established by the 1986 General Management Plan (GMP) is clearly measurable, a numerical limit alone may not be the best approach for managing use of the park road. The plan proposes to set measurable indicators and standards intended to protect park resources and values along the road corridor under an adaptive management approach. This adaptive management and monitoring strategy is detailed in Appendix C.

The plan should note that the current 1 0,512 vehicle limit is the result of a phased reduction of the 1984 use level of 12,661 vehicles. This reduction, implemented as part of the 1986 GMP, included a planned 20% increase in tour and shuttle bus numbers and a 45% decrease in the number of private vehicles.

While we agree that a numerical limit alone may not be the best approach for managing vehicle use, we are not convinced that impacts arising from the current system are of sufficient magnitude to warrant extensive changes to the existing road management strategy or in use levels. However, in order for this commission and the public to objectively assess the potential benefits of the proposed management and monitoring strategy versus the current fixed numerical limit, more information is required. Little or no information is presented on the actual number of vehicles, by various type -bus, private vehicle, administrative vehicle, or vehicles transporting lodge visitors- that travel the park road throughout the season.

For example, Table 7 on page 93 lists the number of recreation visitors each year from 2005 through 2010. These numbers are broken down into 4 different categories- bus riders, lodge visitors, entrance area visitors and visitors in private vehicles past the Savage checkpoint. The table contains no information on the actual number of vehicles under each category traveling the park road during those years. Consequently, we cannot determine from the plan if use levels for the 2005-2010 period ever reached the limit of 10,512 vehicles limit or if they were at lower levels in some or all of the years. We believe it is safe to assume that traffic levels never exceeded the seasonal limit, but figures showing actual vehicle use should be provided.

There are other problems with the data presented in Table 7. The first is the recreational visitor numbers for 2010, which, according to footnote #2, were compiled using an adjusted methodology that produced an increase in total recreation numbers of approximately 8-10%. No further explanation is provided. Nor does the plan discuss how this relates to the number or types of vehicles on the park road. The second problem is that the recreational visitor use numbers in Table 7 include the shoulder season even though management of vehicles during the shoulder season was not considered because they were determined to be outside the scope of this draft plan. (pg. 83) The result is an inflated figure that does not reflect use levels during the allocation season.

While we understand that once fully implemented the proposed adoptive management strategy is not designed to be tied to a fixed limit on vehicle use levels, it is important to define a "starting" point for that strategy. We know that the 10,512 limit is the maximum number allowed under the current allocation system. We also know that actual total use levels vary from year to year and also by vehicle type. What we don't know is the actual use levels for each year since the existing limit was established. This is readily available data and should be provided.

Need for this information is demonstrated by the four tiered structure of the proposed management strategy. According to the information in Appendix C Adaptive Management and Monitoring Strategy for the Vehicle Management Plan and EJS, "The first tier includes a set of indicators with quantitative standards associated with them designed primarily to regulate the numbers of vehicles on the park road in such a way that natural resources are protected and the visitor experience is preserved." (Appendix

C, pg.l) Under Tier 1 of the strategy, the plan (Appendix C, pg. 3) states: "These indicators and their associated standards will initially limit traffic volumes on the park road, though further limitations may result from the higher-tiered parameters." Does this mean that traffic volumes will be reduced from the current I 0,512 limit or from the actual traffic volume? No explanation is given for why current traffic volume would have to be reduced to develop the quantitative standards in Tier I. Consequently, it is not possible to determine if an initial reduction is necessary under Tier I.

We suggest that the final plan include a revised table or tables that include the following for each allocation season since adoption of the current system: 1) total seasonal recreational visitors during the allocation season; 2) number of non-recreational users; 3) vehicle allocation by type; 4) total number of vehicles by type (including non-recreational users) actually using the road during the allocation season; 5) total number, by year, of vehicles using the road during the non-allocation season; and average number of vehicle by type for each year.

Teklanika Campground Future plans for this campground need to be clarified. In Table 3 -Summary of Alternative Elements- (pg. 65) under Alternative B it states: "If needed, Teklanika River Campground would phase in a tents-only campground over a 1 0 year period with visitors using the transportation system for access." Similar statements are made in Chapter 4- Environmental Consequences- on pg. 175: "Alternative B also proposes a potential change to ..... Teklanika River Campground. Over a 10 year period, this campground could become a tents only campground .. " and on pg. 184: "Within IO years, Teklanika river could become a tents only campground .. "

Elsewhere in the discussion of environmental consequences, the EIS (pg. 194) clearly states that Teklanika campground "would phase into a tents only camping area within 10 years of plan implementation." Similar statements indicating the closure of the campground to recreational vehicle users are found on pages 21 0, 21I, 224 and 232. The final plan should clarify future plans for recreational vehicle camping at this campground.

We understand that the proposal to phase out recreational vehicle camping at Teklanika is intended to reduce the number of private vehicles traveling past the Savage checkpoint. This is not a new proposal, as it was included in the 1986 GMP. Unfortunately, the plane contains no information on the number of recreational vehicles that stay at this campground during an average year. Consequently, it is impossible to determine how much POV traffic would be reduced by eliminating this use and how many park visitors would be directly affected by disallowing recreational vehicle use.

We do not support the closure of the Teklanika Campground to recreational vehicles under any of the alternatives. Thousands of visitors travel to Alaska each year via recreational vehicles. Many of them will visit Denali National Park and should be afforded the opportunity to stay in the park in their recreational vehicles without being limited to the entrance area. The limited number of campground permits available to recreational vehicle users, as well as the current restrictions requiring a minimum 3 day stay and which do not permit travel past the Teklanika campground are adequate to protect park resources, while still providing camping opportunities for this segment of the visiting public.

Inholder Access Under Alternatives Band C, the plan proposes to issue commercial authorizations to those lodge or business operators in Kantishna who currently provide day tours. These day tours are now conducted under the allocated road permits which provide for inholder access under ANILCA Section 111 O(b). The reason given for this proposed change is that "Conducting commercial activity in the park outside the boundary of the inholding is not provided by Section 111 O(b)." (pg. 46) While some form of separate commercial authorization may be considered necessary, it is essential that the NPS continue to recognize the guarantee of access to all park inholdings "for economic and other purposes" provided by ANILCA.

We are also concerned about the type of commercial authorization that could be required if either Alternative B or C is adopted. Day tours provided by the lodges in Kantishna are an important part of their business and should be allowed to continue. This can best be accomplished through issuance of a commercial use authorization rather than a competitively awarded concession contract. At the same time, the plan must contain enough flexibility to allow other property owners to develop businesses on their property or to take advantage of future economic opportunities using national park lands. It is also important to note that of the current allocation of 1360 permits for access for

Kantishna inholdings, only 1202 permits or roughly 90% of capacity are actually assigned. We understand that inholders requiring additional permits are not denied under the current allocation system. We are, however, concerned about the statement on page 184 that Kantishna inholder access may be "reallocated" to benefit the transportation (bus) system. This is particularly troubling in light of the longstanding NPS policy regarding Kantishna inholdings.

The 1986 GMP and Land Protection Plan included a planned reduction in the number of private inholdings in Kantishna to preclude future development of commercial visitor facilities and further reduce traffic demand. This strategy was reconfirmed in the 1997 Final Entrance Area and Road Corridor Development Concept Plan and most

recently in a December 2010 letter from the Alaska Regional Office to a park inholder.

The allocation for Kantishna inholder access should not be reduced or permanently reallocated under any of the alternatives or under any adaptive management strategy. In addition, the potential for future increases in access needs for inholders must be recognized and provided for in the plan, consistent with the guarantee of access for economic and other purposes.

We also suggest that in order to avoid any confusion ANILCA Section 111 O(b) be quoted in its entirety. (pg. 28)

The Commission appreciates the opportunity to comment on this plan. We also thank you and Superintendent Anderson for attending our October 27 meeting to discuss the plan, to answer questions and help members better understand the proposal. We understand the importance of the Denali Park Road as a means for the visiting public to enjoy the wildlife and scenic resources of the park. We also recognize the need to manage use of the road in such a way that the public can continue to enjoy those resources. And finally, we encourage the development of a plan that will also protect the access rights and current and future economic opportunities of the businesses and property owners in Kantishna and elsewhere in the park.

Correspondence ID: 288 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Since we all see through a personal prism, my comments on the Draft Vehicle Management Plan reflect concerns regarding how Alternatives B and C would impact professional photography in Denali National Park. I'm a professional photographer, having only recently gained adequate credentials to compete in the park road permit lottery this spring, and I was thrilled to be selected for visits to the park this summer. My experience was unforgettable, and as I continue to work with the images made during trips in July and August my admiration for the national park concept and Denali National Park in particular has grown exponentially.

From my perspective the national park concept is precious, and defending if from excessive commercial exploitation while at the same time advocating the concept's broader value to the world at large is a supreme challenge. I've studied the plan. I understand the competing priorities and subtle balancing act required to manage highly diverse interests. I strongly support and defend efforts to keep the presence of people and machines from having too great a negative impact on wildl ife and the surrounding environment. But balance is necessary, and frankly the proposed reduction in road permits and limitation to specific areas of the park for professional photographers in Alternatives Band C seem draconian to me, to the point of making me wonder what motives are really driving this proposed action.

As vehicle management within the park is reconsidered , I fervently hope one tiny segment of user access is not sacrificed simply to provide more opportunity for additional huge busses to fill the environment with diesel roar, airbrake yelps, and immense dust clouds on passage. If my being quietly parked by the side of the road for part of one afternoon in August while observing a wolf pack bedded down nearly a mile away was an adverse visual distraction to other visitors to the park, I apologize; but I seriously doubt anyone on a passing bus would have even seen the wolves or heard the incredibly inspiring chorus of howls that gently rode the airwaves for a minute or two as the members of the pack communicated among themselves.

I sincerely hope the number of "pro photo" permits are not slashed as recommended in Alternatives B and C. Denali National Park needs continued advocacy, from many diverse representatives, and the images made by participating professional photographers are among the strongest. As a park advocate I'd be happy to contribute some of my work to help perpetuate appreciation of this jewel of the north. Thank you for the opportunity to participate in the pro photo permit system this summer.

Correspondence ID: 289 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I am in agreement with Tom Walker in EVERY aspect. Additionally, being a VTS driver myself who knows the system quite well, my head was spinning on trying to understand alternatve B and C. Heck, even with the simplified current system, people are often confused! Be it as a bus driver or a passenger that has gotten off the bus to explore the "true" park. keeping straight what one needs to do to get back on a bus under alternative B and C requires far too much planning. Remembering the options available, disruption to passengers already on the bus, etx. The current systems (VTS and Tour) are doing a stellar job in meeting the needs of the packaged tour passengers, day hikers, bckpackers, and those opting for the "economy" tour (VTS). VTS schedules/Buses are constantly being assessed and adjusted to insure minimal wait times for passenger pick up with all the variables (types/classes of passengers) in alternative B and C. Who is going to develop, monitor, and administer the complexities invloved in meeting the needs of several types of passengers on the same bus.

I still question the affordability of VTS trips for families as does Tom Walker.

I have been successful as a computer programer for 36 years I think due in large part to my mantra "If it ain't broke, don't fix it"

Note: Included in this comment was a scan of Tom Walker's Anchorage Daily News article with the following highlighted: "I can only support Alternative A".

Correspondence ID: 290 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: The State of Alaska reviewed the Draft Denali Park Road Vehicle Management Plan and Environmental Impact Statement (DEIS). The following comments represent the consolidated views of the State's resource agencies.

The State appreciates the Service's efforts to anticipate and plan for increased visitation within the Park. While the Park Road vehicle limit of 10,512, established in the 1986 General Management Plan, has accommodated visitor use thus far, the number is largely arbitrary. We therefore also appreciate the objective to establish a science-based approach to vehicle management. Based on conversations with Park staff, it appears that the Service believes it will be able to increase overall access along the road while maintaining or improving visitor experience and protecting park resources.

Unfortunately, this conclusion is not particularly obvious in the DEIS and we recommend additional explanation in the final EIS.

Based on our observations of the Denali Backcountry Plan, which also relies on a science-based approach, use of standards and indicators sometimes proves challenging. Unforeseen issues may arise during implementation, especially as visitation increases over time. We anticipate we will work with the Service on those and other routine implementation issues through the annual Compendium review process. Tourism is one of Alaska's largest industries and Denali is a critical component to the State's tourism industry. The current transit system is well established and any changes that affect that system need to be carefully considered. For example, our understanding is a minimum of two years lead-time would be necessary for industry to respond to changes that result from monitoring efforts. We request the Service continue to work closely with tourism representatives on these issues to ensure the plan does not negatively affect the needs of this vital industry.

As you know, the State has a long-standing interest in both Kantishna and ensuring inholder access rights under ANILCA Section 1110(b) are honored on a statewide basis.

We support the continued viability of the lodges at Kantishna, which add a uniquely Alaskan dimension to the range of park experiences. While we agree with the plain statement on page 46 that "Conducting commercial activity in the park outside the boundary of the inholding is not provided by Section 1110(b)," the established pattern of private day tours provided by some of the Kantishna-based lodges has evolved over the years and is not necessarily cleanly outside the scope of ANILCA Section 1110(b) by virtue of recent history. The Service has openly accommodated this use for many years under the ANILCA inholder access provision and the resulting business model for some of these remote lodges appears dependent on this day use.

We therefore appreciate that the draft plan provides alternatives to continue day trips to Kantishna. The benefits of allowing this day use under one or more commercial use or concession operations could be substantial for all parties, including the ability to increase Kantishna day use. The resulting ability to coordinate the departure times with other bus trips could also reduce congestion and improve the experience of all passengers. We also appreciate that the Park has made a considerable effort to reach out to the affected lodge owners for solutions and we encourage these parties to work out an effective and mutually beneficial strategy.

We request the Service also carefully consider the likelihood that inholders would be successful in obtaining a concessions contract through the competitive bidding process. If there is a chance that the competitive process may eliminate the opportunity for inholders, we recommend instead permitting day tours with a commercial use authorization. The State supports a long-term solution that, at a minimum, provides inholders with continued levels of Kantishna day use.

Page-specific Comments Pages 28-29, Park Road Motor Vehicle Permits: The DEIS does not specify how the regulation would be revised under Alternative B or C. We request the final plan clarify how the seasonal vehicle allowance would be accounted for under adaptive management as compared to the current numerical limit. Page 46, Actions Common to All Alternatives: We recommend that the final plan further clarify the intended distinction between day use for Kantishna lodges and access for "overnight guests and travel necessary for operation of the inholding." In light of Alternatives B and C that would manage Kantishna day use as a commercial visitor use, an

understanding of the basis for this distinction is important. Pages 183-187, Transportation System and Traffic (Environmental Consequences): The only reference to Kantishna inholder access in this discussion is on page 184 regarding Alternative B. As with the page-specific comment for page 46, this reference should clarify what type of use "may be reallocated." There is no reference to inholder access in the analysis for Alternative C. The final document needs to avoid the implication that the Park may arbitrarily take away "adequate and feasible access" under Section 1110(b) to benefit recreational visitors.

Correspondence ID: 291 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Thank you for providing the opportunity to comment on the Draft Denali Vehicle Management Plan and EIS. While there are many features of the Action Alternatives that I do support, I do not support an action alternative that would eliminate statutory limits.

Public lands benefit from transparent management practices and an involved public, yet this document, with the wide array of actions presented in the alternatives and the complex monitoring structure, often becomes bewildering, and certainly not easily accessible to even the well--?educated public.

Adaptive Management isf a promising management tool, but it's ability by itself to manage traffic on the Denali Park Road, without impacting the Park's natural resources, is yet unproven.

Major decisions about road capacity could be made through a much less stringent (and more frequently amended) procedure than a NEPA process requires, and would require a much heavier burden on concerned citizens and organizations who would like to provide input on these management decisions.

I would support an alternative that utilizes adaptive management within a defined period of time, in order to establish statutory limits and a set of (tested and proven) indicators and standards for future monitoring. Any research should investigate how reducing and increasing traffic levels influences impacts park resources. NPS acknowledges that the indicators in this EIS are based on the current traffic conditions.

I am concerned that by codifying current conditions, without devoting equal resources to research the impacts of a decrease in traffic, NPS is preemptively accepting the current levels of impact.

It seems that a truly "adaptive" system of management would test potential impacts of both increased and decreased traffic levels and would produce a clearly defined capacity for the Park Road with a strong scientific defense. This research could then be used to establish statutory limits, develop bus schedules, and to test the feasibility of using identified (or newly identified) indicators and standards, which could then be used for future, periodic monitoring. While I do support this additional research, the use of collaring should be limited to the absolute minimum necessary, especially with animals identified as more sensitive to this practice, to minimize impacts to park resources, including wildlife, wilderness and visitor experience.

I support the inclusion of construction vehicles in vehicle counts as it allows for a more accurate measure of traffic. It seems that it would also be beneficial for NPS to include shoulder seasons in future monitoring, to determine the impacts that shoulder season traffic creates, especially on wildlife.

Will a mandatory reduction in nighttime traffic levels produce an increase in road use in shoulder seasons? How will this increased traffic pressure be monitored and mitigated?

As far as visitor access, I understand the park's desire to differentiate between passengers who will or will not get off the bus, but unfortunately this differentiation is not so simple. As pointed out in this EIS, 59% of transit riders (and a notable 44% of tour riders) "would have liked to get off the bus to hike." Visitors often decide whether or not they will get off the bus once they are out on the park road.

There should be no allocation on transit buses between "economy tour" riders and "transit" riders. If there is any ticketing differentiation between these types of riders (i.e. ones that plan to get off and ones that do not), seats should be made available and booked through the same means, and a certain percentage of seats on every transit bus should remain open to allow for spontaneous trips and independent travelers.

There should be no preferential seating for certain types of riders. Requiring increased education of park visitors on the full spectrum of transportation options available to

them in the park (included in Actions Common to all Action Alternatives) should focus on ensuring that all visitors are aware of all options, rather than one that is available through their tour operator, and they should be made aware of the cost of the ticket were they to purchase directly from the concessioner.

It seems that allowing large--?scale resale of tour tickets by commercial interests, and by providing pick--? up at hotels only for these tour package riders, tour riders are currently given some preferential access over transit. This situation is likely skewing the perceived demand for transit vs. tour, and it should be addressed.

I support movement to ensure equal opportunities for all visitors to access the full range of transportation options, while maintaining opportunities for spontaneous trips and independent travelers. Affordability is a critical part of accessibility.

I am encouraged that affordability was included as a goal of this EIS, but I am concerned that the standards set for affordability are inadequate. The park has recently examined mountaineering fees through the NEPA process, and stated in a recent news release on mountaineering fees that it "fees will be adjusted periodically based on actual costs, not to exceed changes in the cumulative consumer price index." It seems appropriate to consider standards of some sort similar to this in the VMP, and give fee structures the same extensive consideration mountaineering fee changes received.

Considering the unique access to public lands that Denali's transportation system provides, it seems appropriate to define a unique price index. This would ensure affordable access to visitors of all economic backgrounds, and would rely on economic data, rather than perceived economy.

Additionally, many visitors who come to Denali are part of a package tour. Unless they choose to independently purchase a ticket directly from the Park's concessionaire, they are likely unaware of the actual cost of a bus ticket, isolated from the rest of the package tour they selected, making it impossible to judge a tickets perceived value.

I fully support interpretation in our national parks, and Denali provides an outstanding opportunity to use interpretation to facilitate connections between visitors and their public lands. While bus drivers should certainly receive at least some training in interpretation, it seems more pressing for transit drivers to have a general knowledge of park history and natural features along the road (which they generally do, to an impressive extent), and maintain a focus on transportation, not interpretation. Transit drivers could easily use informal interpretive opportunities (which they should receive training in) to facilitate visitor connections, without a formal narrative. It's reasonable to require more training or higher standards for tour drivers, as is currently the case. In all interpretive programs,

I support the independent development of interpretive programs. This allows drivers to present information they are passionate about, which ultimately has large impacts on visitor experience. If NPS offered materials for a self--?guided tour separate from bus ticket purchase, it could meet the demand for an "economy" tour, without a need to allocate seats for this type of passenger. Interpretive materials, provided on demand, can satisfy the need for visitors who want something more than a quiet ride, but not a full--?blown tour, and would not impose educational opportunitieson visitors that aren't looking for that type of experience.

Improved visitor education about opportunities for transportation will likely result in increased use of the transit system, not only because of it's economics, but also because it provides an opportunity for visitors to simply sit and enjoy, and take in information at their leisure. This type of opportunity (and the value it plays in a visitor's experience) is too often overlooked.

Self--?guided tour materials should not infringe on the opportunities for solitude desired by some riders, and NPS should consider the impacts that new technologies for distributing such materials may have on the wilderness experience for both transit and tour riders. NPS should be cautious in introducing new media formats, and consider potential impacts to visitor opportunities for a quality wilderness experience.

This EIS states that it requires no additional infrastructure, but it is unclear how current rest stops along the park road could handle increased traffic that would come with flexible destinations, and whether the current infrastructure could support it. It seems that allowing flexible destinations would increase the need for a defined capacity and standards at more than just the few destinations identified in this EIS. Also related to infrastructure, previous Environmental Assessment findings regarding the Toklat Rest Stop state clearly that there will be no permanent structure for book sales, yet this facility is listed as a feature of the Toklat Rest Stop in this EIS (page 100). As this contradicts with a previous Environmental Assessment that addressed infrastructure changes, and as this EIS suggests that it will not change infrastructure along the park road, references to a bookstore at Toklat should be removed. The park should transparently address, and openly acknowledge any changes to infrastructure at the Toklat Rest Stop. Reference made to a "Toklat River Rest Visitor Center bookstore" (page 144), and all features at Toklat that are not currently considered "permanent," should be clarified or deleted from this EIS.

Thanks again for the opportunity to provide input. I have reviewed the comments submitted by the Denali Citizens Council, and fully support them. Additionally, I hope that NPS continues to keep Adolph Murie's vision for the Denali Park Road at the forefront of their consideration in these management decisions. To borrow Murie's words from comments made in 1956 on the park's Mission 66 report: "In conclusion, I urge again that we stress, in all our planning for McKinley, the high purpose of wilderness quality."

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Received: Oct,31,2011 00:00:00
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Correspondence: 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.

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.

1. 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. Denali Citizens Council ? Draft Vehicle Management Plan Comments ? 5 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 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: o 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. o 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. No one year will have less than 85% of hikers with wait times of less than 30 minutes.

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 wellsupported 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 Denali Citizens Council ? Draft Vehicle Management Plan Comments ? 15 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.

Correspondence ID: 294 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: 1) These existing 10,512 vehicle limit in the regulations is arbitrary and of mysterious and little supported origin. It used to be 12,661, also of uncertain origin. I searched the 334 page PDF of the document and did not find this former limit in it anywhere. It certainly should be discussed and the process used to reduce that number by 17% accounted for in detail.

I agree with Supt. Anderson that this 10,512 number needs to come out of federal regulation and be replaced with a more sophisticated approach to the issue.

2) The document says that it will not affect 1110(b) inholder access. Concerns: a) Legally required 1110(b) access needs to be at an equal or higher priority to other access uses. b) Such access must not be time shifted (ie only allowed between 1 am and 5 am, that sort of thing) c) Such access must not be choked out by the imposition of quotas (p 45): All vehicles traveling on the restricted section of the Park Road would be required to follow a set pattern for vehicle movement (e.g. number of vehicles per hour per road section) to meet standards for achieving desired conditions. 3) Kantishna "Day Tours" - There is no basis for grandfathering this to only two existing lodges. This is totally unacceptable. It is discriminatory to other lodge owners and landowners, is anticompetitive and does not give the visitors options and best value. 4) Costs to the public of this proposal are of concern: a) Every year, changes in the superintendents compendium are subject to a "public comment" process. These are expensive for both the NPS and the operators to be constantly subject to this every year. Maybe a tow or three year period of stability should be used instead. b) $2 million has been spent so far on research so far but this "adaptive management approach" seems to embed a permanent, constant ongoing research effort the cost of which the bus operators and ultimately the park users have to pay. Are there sensible controls to ensure that there will be real and useful value come out of this cost? c) Competitiveness and Value to the Public - I strongly disagree with much of the comments made by the Denali Citizens Council on this plan. However material in point 2. made in the Sep-Oct issue of the DCC News have merit: 2. "Perceived Value" is an inappropriate standard for assuring the affordability of basic transit service at Denali. The Denali transit system, and all national park fees, should be priced to encourage all Americans to experience [the park]. Denali has an added responsibility to provide affordable transit since it does not allow other options for traveling the park road.

Correspondence ID: 295 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am writing this letter on behalf of the members ofboth the Rainy Creek, LLC and Eldorado Ventures, LLC. It is unclear, with regard to the various alternatives, which alternative would negatively impact the use ofthe property owned by Rainy Creek, LLC as well as the mining claims held by Eldorado Ventures, LLC.

As you are aware, under ANLICA, all inholders must be afforded adequate access to their property. This access varies year to year dependent upon the use and/or operation of both the Rainy Creek property and the Liberty Claims. It has always been our position that the park service cannot restrict or limit our access to either property.

As it is not clear in reviewing the impact study as to whether Alternative "B" or "C" would detrimentally affect our inholder access, we would support that no action be taken and thus we would support Alternative "A."

Correspondence ID: 296 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Thank you for the opportunity to comment on the Draft Plan. The Draft Plan is of vital concern to our Denali Backcountry Lodge ("DBL") as it could have substantial economic impact on us and our ability to serve guests at our in-holding. We appreciate the opportunity to provide our comments and look forward to a lasting partnership with Denali National Park.

We first would like to state our full support for the overreaching goals of the Draft Plan, namely, to "provide a high quality experience for visitors; protect wilderness

resource values, scenic values, wildlife, and other park resources; and maintain the unique character of the Park Road."

We intend to reflect these mutual goals and values in all facets of our operations. DBL is part of Viad Corp's Travel and Recreation Group, which has an exemplary record of managing properties in and near national parks. In addition to DBL, our Group includes Glacier Park, Inc. ("GPI") and Brewster Inc. ("Brewster"). GPI has been the primary concessioner in Glacier National Park for over 30 years. GPI works with the National Park Service ("NPS") as a partner with the local, regional, and Washington levels of NPS, and has always received satisfactory ratings. GPI staff have been involved with pricing and evaluation classes hosted by the NPS and are very knowledgeable regarding NPS concession regulations. GPI regularly partners with the local Park staff to host fund raisers for NPS non-profit partners, as well as hosting Park training and seminars in both our in and out of park properties. Similarly, Brewster has had a long, successful history with Parks Canada.

DBL Urges the NPS to Select Alternative A (No Action)

For purposes of managing in-holder access, DBL advocates "Alternative A - No Action," rather than the other alternatives presented in the Draft Plan. DBL believes the current system is working well and is consistent with the mission of the NPS. The current method of managing inholder access effectively supports DBL's ability to plan, market and deliver high quality over-night and day visits to its property, which are great ly valued by its guests.

DBL has reviewed the Draft Plan's environmental impact data and findings. We look to the NPS' leadership to articulate whether the findings demonstrate that in-holder access is adversely impacting wilderness resources and values, particularly in light of the fact that in-holder access represents a very small percentage of overall traffic. If Draft Plan findings, in fact, indicate potential adverse impacts, then we request that the NPS consider measures that reasonably address such potential adverse impacts without overhauling the current method for managing inholder access. However, DBL respectfully maintains that the study of the Park Road has not resulted in findings that demonstrate that the In-holders use of the Park Road is adversely impacting the wilderness resources and values or harming Park visitors' enjoyment of the Park.

Further, we urge the NPS to select Alternative A because we believe the current method for managing in-holder access aligns better with in-holders' access rights under ANILCA Subsection 1110(8), and that changes to the present method may be inconsistent with this federal mandate. DBL has ca refully considered Alternatives Band C and their potential impact on DBL's guests and operations. In many respects, information concerning these alternatives lacked detail or was insufficient to fully evaluate their impact on DBL. If the current system of allocating permits is altered, important questions include: How will decisions regarding access requirements be made? How often will they be made? How far in advance will they be made?

In general, DBL believes these two alternatives would adversely affect its ability to ensure a high quality guest experience. A very significant concern is that Alternatives B and C would limit DBL's ability to continue to provide day trips at current levels. If the NPS rejects a no-action approach for in holder access, DBL advocates Alternative B but only with modifications that; (i) preserve DBL's ability to schedule trips at a minimum of eighteen months in advance; (ii) do not limit or reduce the number of day trips DBL may conduct; (iii) do not favor alternate transportation providers; and (iv) do not permit, at any point in the future, consolidation of transportation service into one provider.

DBL does not support Alternative c.

Bus Access Needs DBL requires access to its in-holding for a variety of purposes. It is critica l to the success of DBL's operations that it have the ability to personally provide transportation to and f rom its lodge. The transportation is integral to establishing a personal touch with our guests, serving their needs and optimizing their backcountry experience at the in7 holding. DBL seeks to protect its current allotment of 315 vehicle permits as a mm1mum and, when necessary for reasonable access, to obtain additional permits whether they are added to the annual allotment or for purposes of a single season. This provides DBL the certainty that is required to schedule day trips and maintain its investments in its property.

The adaptive management approach would appear to allow Park managers to make changes in scheduling of in-holders' buses and in-holders' permits according to previous year's data. This approach is detrimental to meeting our guests' needs as we plan our trips and confirm space allocation to them eighteen or more months in advance of the operating season.

Right to Conduct Day Trips under ANILCA Subsection 1110(8) DBL's day trip enables visitors to experience our in-holding property without requiring an overnight visit. Visitors that select DBL as their day trip destination enjoy lunch and may choose among va rious activities at the in-holding. DBL specifically built a day lodge on the in-

holding to entertain day trip visitors, and operates as many as 2 or 3 trips per day depending on visitor demand.

DBL believes that it has a right to operate buses on the Park Road to conduct day trips to its in7holding under ANILCA Subsection 1110(8): " ... the private owner .. . shall be given by the Secretary such rights as may be necessary to assure adequate and feasible access for economic and other purposes to the concerned land ... subject to reasonable regulations issued by the Secretary to protect the natural and other values of such lands." All elements of the Draft Plan, and all future actions taken by the NPS ,under it, should be fully consistent with this provision. DBL's access rights, for example, should neither be re-allocated to the transportation system, as suggested in the Draft Plan, nor left to the discretion of future Park managers.

Some comments in the Draft Plan appear to question the rights of in-holders to use the Park Road to conduct day trips to in-holder property. DBL is unaware of any supporting authority for this position.

As a private owner, DBL has a statutory right of access for economic and other purposes concerning the in7holding. This statutory right entitles DBL to operate vehicles to the in-holding via the Park Road. Allowing DBL access for its over-night guests but not for its day guests is an arbitrary distinction under ANILCA Subsection 1110(8). Visitors desire day trip service to the inholdings.

Denying DBL access to the Park Road for day trips, would be detrimental to DBL's use of the "concerned land" including its purpose-built day lodge. DBL believes this distinction constitutes a new interpretation of federal law that is contrary to rights that the NPS has implicitly acknowledged in the past. Day trips are an important means to draw guests to the in-holding and, more generally, to market the property.

The sightseeing experience along the Park Road is inseparable from the experience of visiting the in-holding. The fact that the Park Road has a unique scenic character should not be a rational for limiting access to the in-holding. Furthermore, DBL respectfully maintains that the Draft Plan has not resulted in findings that demonstrate that the in-holders' use of the Park Road is damaging the natural or other values of the Park.

If the NPS does not adopt Alternative A for purposes of in-holder access, DBL reserves its rights to conduct day trips pursuant to its statutory access in the future regardless of whether DBL agrees to operate its day trips under a commercial use authorization or commercial contract.

Closing Remarks The work of the NPS contributes greatly to preserving our country's unspoiled places. The Denali National Park has a significant history that makes for a wonderful story for visitors to experience. DBL is a part of that rich history. It has its own story to tell visitors about the way-of-life and other history on the property and in the surrounding area. This adds to the quality of experience and spectrum of choices that visitors may choose among when traveling in the general area. DBL looks forward to working in partnership with the NPS to protect the Parks' wilderness resources and values with the view that reasonable access must be provided for full visitor enjoyment and use of the Pa rk, including enjoyment and use of the DBL.

Correspondence ID: 296 **Project:** 22494 **Document:** 42309
Received: Oct,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Thank you for providing Princess Cruise Lines, Ltd. ("PCL") the opportunity to submit the following comments in response to the Notice of Availability of the Draft Environmental Impact Statement ("DEIS") on a Denali Park Road Vehicle Management Plan for Denali National Park and Preserve (" Park") issued by the National Park Service ("NPS") on August 1, 2011 . Draft Environmental Impact Statement on a Denali Park Road Vehicle Management Plan for Denali National Park and Preserve, 76 Fed. Reg. 45848 (Aug. 1, 2011). As one of the largest providers of cruisetours to Denali National Park, PCL has a substantial interest in the revision of the plan. I. Introduction For more than 35 years, PCL has been a leader in Alaska tourism offering premium cruise and cruisetour vacations. PCL's investment in Alaska is substantial and includes: 7 ships servicing Alaska itineraries, 5 owned and operated wilderness lodges, significant rail operations, and the largest motorcoach fleet in the state. In 2011 , PCL introduced roughly 238,000 guests to the state. Visitors have three general options when traveling to Alaska with PCL: an Inside Passage cruise, a Gulf cruise, and a cruisetour. A cruisetour is a combination of a 3-8 night Alaska land tour plus a Gulf cruise; cruisetours include overnight stays, transportation, sightseeing experiences, and in some cases meals and a tour director. All PCL Alaska cruisetours spend at least one night in the Denali area and 91% of offerings include a park tour within the itinerary. In 2011, PCL was directly responsible for delivering more than 73,350 guests into Denali National Park for a park tour. Indirectly, the number is significantly higher as many PCL Gulf cruise passengers choose to travel to Denali independently and purchase a park tour on their own. PCL is committed to providing a quality experience to guests, and the Denali National Park experience is an important component of our product. Improving it will have positive implications for the entire tourism industry for years to come. PCL desires an outcome that will be a transparent, fair, and efficient transportation system that protects the natural resources while allowing visitors to experience the uniqueness of Denali National Park. II. Comments A. PCL Supports Alternative B, With Certain Modifications PCL urges NPS to adopt Alternative B, with

certain modifications as described herein, as the final management plan. Alternative B would combine transit and selfguided economy tour services on the same buses, as well as provide for the following guided premium tours: premium short tours of up to a half-day in duration, to Teklanika; and premium long tours of a full-day in duration, to destinations along the length of the Park Road, predominately between Teklanika and Wonder Lake. Draft Plan at 47-48. Consistent with proposed Alternative B, PCL maintains that the transportation system under the revised plan should provide for the following transportation and tour service options: ? combined transit and self-guided economy tour services, utilizing the same buses; ? guided premium short tours to Teklanika (4.5 hours in length); ? guided premium long tours to Toklat Rest Stop (7-8 hours); and ? guided premium long tours to Eielson Visitor Center (8-1 0 hours). PCL believes that this Alternative, modified as discussed herein, would result in the most efficient use of limited road capacity and offer the public the most understandable and desirable range of tour and transportation offerings. Although the Draft Plan includes some discussion of pre-booking of the new combined transit/economy tour service by visitors, it does not specifically address prebooking by tour operators. The Draft Plan states that "The majority of seats would be available for pre-booking by all visitors, although some seats would be retained to allow for spontaneous trip planning for walk-in visitors, and to pick-up eastbound travelers." Draft Plan at 47. PCL maintains that the final plan should expressly allow tour operators to pre-book the new combined transit/economy tour service. Further, we recommend that the final plan make available for pre-booking up to 75% of seating capacity on the new combined transit/economy tour service buses. Such provision would greatly simplify the marketing, booking, and scheduling of this service, to the mutual benefit of visitors, NPS, the service operator, and tour operators. PCL also believes that the guided premium short tours should provide an off-bus experience as a key element of those tours. The Draft Plan describes these tours as follows: "Topics and activities for the short tour would be standardized (i.e., wildlife, park history, wilderness) to increase operating efficiencies in training and marketing. Premium short tours would incorporate a visit to the Denali Visitor Center and would originate from the Wilderness Access Center or with a pick-up at a local hotel." Draft Plan at 48. PCL supports an engaging, relevant and consistent off-bus experience that can be easily communicated and marketed. Ideally, this experience would encourage guests to interact with a park ranger, interpretive guide, or other relevant expert. The 2 experience would have to be accessible for all guests and should be relatively lowimpact. Additionally, PCL prefers that the interpretive content/topics/narration for all premium tours be consistent. The main differentiation between the premium tours should be the duration of the tour and the distance traveled on the Park Road. Currently, the Denali Natural History Tour focuses on the natural and cultural history of the Park, while the Tundra Wilderness Tour focuses more on wildlife and history. These content differences create a confusing situation for visitors as they educate themselves on the choices and try to choose their experiences. All premium tours should include content covering the history, wildlife, culture and natural features ofthe Park at some level. Obviously, the longer tours will provide more in-depth content, but PCL does not think narration/tour content should be a point of differentiation between the premium tours. Moreover, PCL believes that the overall number of each type of premium tour should remain flexible to allow NPS and providers to respond to visitor demand for each type of tour. Thus, for example, if visitor demand were to indicate a shift away from premium short tours and toward premium long tours, the system should allow flexibility to accommodate such demand. This would improve the visitor experience as well as allow for greater efficiency of bus scheduling and use. B. PCL Opposes the Plan's Prioritization of Transit Over Premium Tour Options PCL strongly opposes Alternative B's proposed prioritization of transit over premium tour services. The Draft Plan makes multiple statements indicating that, under Alternative B, in the event that transit buses are operating near capacity or that capacity on the road becomes limited, transit buses will be given priority and use will be reallocated from premium tour services and other transportation uses to transit services. For example, the Draft Plan states that Alternative B "may require regularly reallocating buses between transit and premium tour services. It may also require reallocating use between the transportation system vehicles and other vehicles of the Park Road." Draft Plan at 48. A similar statement appears at pages 183-84 of the Draft Plan. The Draft Plan further states, with regard to the adaptive management framework, that if trends indicate the standards for visitor experience indicators are or could be exceeded, NPS could respond with a decrease in traffic levels. "As described in actions common to all alternatives, transit opportunities would be given priority over tour opportunities if a decrease was necessary . . .. " Draft Plan at 75, 76. PCL respectfully urges NPS not to prioritize transit over premium tour services in the final plan. Such prioritization is not necessary in order to ensure that visitors to the Park have a wide range of opportunities, at various pricing levels, to experience the Park. Instead, such a policy could negatively impact the availability of premium tour services for visitors who seek "an experience that offers guided interpretation, education, and visitor opportunities to understand and appreciate the park's natural and cultural resources." Draft Plan at 48. Such a result would be inconsistent with the Plan's goal to 3 "provide a high quality experience for visitors," Draft Plan at 3, and Alternative B's objective to offer a "greater opportunity to have a park experience of choice," Draft Plan at 47. C. PCL Believes That Certain Changes Must be Made to the Proposed Adaptive Management Framework PCL believes that the proposed Adaptive Management and Monitoring Strategy requires further definition. PCL appreciates the Park's interest in adopting an adaptive management approach in the revised plan, and recognizes the value to the Park of having the flexibility to adjust the plan if resource and visitor experience conditions warrant. However, PCL has several concerns about the proposed strategy that must be addressed to ensure that the adaptive management approach is implemented in a manner that does not negatively impact the availability of tour services to Park visitors or the ability of tour operators and others to facilitate those experiences. First, the adaptive management framework must be designed and implemented in a manner that will ensure that tour operators and others whose business planning decisions depend upon Park Road management decisions are provided sufficient advance notice of any changes to be made in Park Road management as part of the adaptive management process. Tour operators must make important marketing, scheduling, and other business decisions far in advance of providing service. In fact, due to the length of the cycle from planning to marketing to booking to providing the service, PCL must adjust its planning to address any dramatic changes in Park Road management at least two years in advance. As proposed, tour operators like PCL will not have sufficient notice of any changes to be made by the Park as a result of implementation of the adaptive management framework. The Draft Plan states that, if trends indicate the standards for visitor experience indicators, sheep gap spacing, or resource indicators are or could be exceeded, strategies such as "changes to non-system uses described in the alternatives or changes to the transportation system schedule, such as removal of buses from the schedule or stepping the system back to the level it was last operating at when not exceeding the standards" would "occur between seasons." Draft Plan at 75, 76, 77. Yet, by this time, PCL already would have been selling the upcoming season for eight months or more. Any adaptive management framework adopted as part of the final plan must set forth a clear schedule for implementation that ensures that tour operators and other stakeholders can reasonably rely on Park Road management decisions and have sufficient advance notice of any changes in those decisions to make meaningful planning

decisions. Second, PCL is concerned that, as proposed, the adaptive management framework process lacks sufficient definition and affords park management too much discretion to interpret the results of the proposed research and monitoring program and to determine what changes to implement based upon that review. PCL recommends that NPS revisit this process and include more specific direction for present and future Superintendents in the final plan with regard to the evaluation of research and monitoring results and the 4 determination of any appropriate adjustments to Park Road management in response to changing conditions. Third, the Draft Plan states that "The prospect of substantially improving decision making justifies the cost of monitoring and assessment" associated with the adaptive management framework. Appendix B to the Draft Plan purports to set forth a breakdown of operating costs (responsibility of the concessioner) and NPS costs associated with each proposed alternative. It appears that the intent of this Appendix was to include the cost of implementation of the adaptive management framework. PCL urges the NPS to confirm that all estimated costs of implementing this framework are captured in this estimate, as well as to provide an evaluation as to how the addition of such costs are expected to affect tour pricing. Fourth, PCL believes that the list of indicators and standards proposed in the Adaptive Management and Monitoring Strategy for the Vehicle Management Plan and EIS is incomplete. PCL recommends the addition of two additional indicators: (1) premium tour participant satisfaction; and (2) system efficiency. The proposed framework includes indicators to detect changes to conditions affecting transit users, wildlife, and natural resources, and to serve as a basis for management changes where necessary to address such changes. Although visitors on premium tours comprise the largest group of users of the Park Road, no indicator is proposed to monitor their satisfaction with their visitor experience and ensure that the quality of the experience is preserved. Moreover, an indicator for monitoring system efficiency would help ensure that Alternative B meets its purpose of optimizing access by promoting "maximized seating on all transit and tour vehicles to offer the largest number of visitors the opportunity to travel the Park Road." Draft Plan at v. Any adaptive management framework adopted as part ofthe final plan should include these additional two indicators. Finally, PCL believes that any adaptive management framework adopted as part of the final plan must specifically recognize that there are factors other than traffic schedules and vehicle numbers that can cause changes in conditions for natural resources and the visitor experience. For instance, weather, climate change, and availability of food sources, among other factors, can all affect wildlife and natural resource conditions. The final plan should explicitly recognize this fact and make clear that the Park will consider any such other factors whether determining whether and, if so, how to adjust management of the Park Road in response to changing conditions. D. PCL Opposes the Cross-Subsidization of Transportation and Tour Options The current tour system as well as all alternatives allow for cross subsidy from one tour to another due to the pricing structure. Because the transit system is not efficiently utilized and it maintains a low retail price, it doesn't generate enough revenue to cover the cost to operate it. The premium tours are considerably more expensive and are more efficiently utilized, and thus the premium tours help to subsidize the transit 5 tours. PCL maintains that, under the new plan, all park experiences should support themselves with market driven pricing. Building in discounts for one type of tour over another presents an inappropriate bias towards one type of visitor over another. III. Conclusion Thank you for your consideration of these comments. PCL appreciates the opportunity to comment and applauds NPS for its commitment to providing a quality experience for Park visitors. Denali National Park is a valued resource and PCL shares your vision and commitment to developing a plan that will create long-term sustainability for future generations to enjoy. Over the years, we have enjoyed a collaborative and productive relationship with NPS and we look forward to this continued relationship for years to come. If at any time you have questions, need further clarification, or would like to discuss PCL' s response, please don't hesitate to contact us. We are committed to assisting you in any way needed.