

Response to Public Comments:

# **National Park Service National Long Range Transportation Plan**

## Foreword

The National Park Service (NPS) National Long Range Transportation Plan (LRTP) establishes a strategic framework for transportation investment servicewide. The current federal surface transportation authorization, the *Fixing America's Surface Transportation Act* (FAST Act), requires federal land management agencies such as the National Park Service to develop long-range transportation plans that are consistent with the continuous, comprehensive, and cooperative long-range transportation planning processes required of state departments of transportation and metropolitan planning organizations (23 USC §134 and 135). This National LRTP is consistent with those processes and legal requirements.

The draft NLRTP was released for 30 days of public review and comment from March 16, 2017 to April 15, 2017. We evaluated all letters and emails provided to the NPS during the comment period. This document summarizes all of the substantive comments we received and provides our responses to them. We thank our partners and the public for providing input on the draft National LRTP. We look forward to working with you as we put this plan into practice and move forward.

## The Public Comment Period

The Draft National Long Range Transportation Plan was made available for public comment on the NPS Planning, Environment & Public Comment (PEPC) webpage from March 16, 2017 to April 15, 2017. The draft plan received 12 comment submissions during the open comment period. From these written submissions, we identified 87 individual comments.

## Summary of Comments

Below, we describe and respond to the substantive comments that were received during the open review period. Generally, a substantive comment meets at least one of the following criteria:

- It challenges the accuracy or adequacy of the information presented
- It presents new information relevant to the analysis
- It presents reasonable alternatives other than those presented in the document

Several comments received addressed grammar, syntax, or other general suggestions; although helpful, those are not addressed in this summary. Similar comments were grouped together and provided a single response below. Comments are grouped in four categories:

- 1 Disputed Information / Inaccuracies
- 2 Requests to Clarify Existing Text
- 3 Requests to Clarify Existing Data, Figures, or Tables
- 4 Requests to Add a New or Expanded Content to the Plan

## 1. *Disputed Information / Inaccuracies*

**Comment:** One commenter noted that the plan suggests private automobiles are the primary form of transportation visitors use to access the parks, but noted that at least one dozen parks are not accessible by automobile.

**Response:** Thank you. We have revised the text to note that visitors rely on private autos to access *most* parks in the National Parks system and that some are primarily accessed via alternative transportation modes.

**Comment:** One commenter noted that the *Improving the Transportation Safety Program* section of the Safety Goal Area chapter states that the NPS is required by law to use crash data to inform decision making related to transportation, but cites Federal regulations. While regulations generally carry the force of law, the commenter suggested replacing this with a citation to the U.S. Code.

**Response:** Thank you. We have removed the term “by law” from the description to eliminate any ambiguity that it may have created.

**Comment:** One commenter noted that the Transit section implies that, due to a discontinuation of major federal programs that in the past funded NPS transit systems, the National Park Service will have difficulty replacing aging buses and other transit capital assets as they reach the end of their useful lives. The commenter noted that MAP-21 eliminated the Transit in Parks Program, but that it also created the Federal Lands Transportation Program which is eligible to fund transit systems as well as roads and other forms of alternative transportation.

**Response:** Thank you for the observation. You are correct that funding transit systems is an eligible activity under the FLTP. Nevertheless, the loss of a dedicated program for funding transit capital and planning needs for the National Park Service and other Federal Land Management Agencies has created a more complex management environment and has put transit projects in competition with Paved Road and Bridge Network projects, among others. We have revised the text within the plan to acknowledge this.

Also, as is detailed in the Transportation Finance Goal Area chapter, the National Park Service estimates that changes in MAP-21 resulted in a net reduction of funding for NPS transportation needs of 23% from Titles 23 and 49 (Highways and Transportation respectively) as compared with the average funding from Fiscal Years 2006-2013. The FAST Act provided increased funding for NPS transportation needs and the National Park Service will release an amendment to the National LRTP in Fiscal Year 2018 to update the financial forecast to reflect this increase.

**Comment:** One commenter suggested that discussion of habitat fragmentation under the Resource Protection goal too narrowly described the impact of roads on threatened and endangered species, and the commenter provided citations of academic literature to support their position that species outside of these classifications are also impacted by roads.

**Response:** Thank you for your observation and associated literature. We have broadened the discussion of transportation impacts on habitat fragmentation to reflect this.

**Comment:** Multiple commenters asked that the National Park Service update project costs mentioned in the Transportation Finance Goal Area chapter's highlight of large scale projects, and to evaluate if the three projects profiled remain NPS priorities.

**Response:** Thank you for your comment. The cost estimates provided reflect the best information available at the time of the plan's development. The three projects cited remain NPS priorities and they reflect the diversity of goals presented in the National LRTP.

## ***2. Requests to Clarify Existing Text***

**Comment:** One commenter suggested adding additional text either in the Introduction or in the Investment Strategy chapter of the document to explain how the Investment Strategy and Goals relate to each other and will work together to identify and prioritize transportation needs.

**Response:** Thank you for your suggestion. We have revised the text in the Investment Strategy chapter *Six Year Expected Outcomes* section to clarify that the Investment Strategy focuses the majority of funding (92%) on asset management and transportation finance Goal Areas, as is consistent with the NPS Capital Investment Strategy and our overall emphasis on asset preservation and deferred maintenance reduction. The Investment Strategy chapter was also revised to clarify that 8% of overall funding supports planning, administration, and management systems. These management systems (e.g. Safety Management System, Congestion Management Program, INSTEP tool) will improve the ability of the National Park Service to address the other Goal Areas in the plan as transportation assets are planned, rehabilitated, updated, or replaced.

**Comment:** One commenter noted that it may be unclear how the Existing Pavement and Bridge Management Systems and NPS Safety Management system mentioned in the Investment Strategies chapter assist in meeting specific Goal Area objectives.

**Response:** Thank you for your observation. We have revised the text in the *Six Year Expected Outcomes* and *Implementation* sections of the Investment Strategy chapter to further describe these connections.

**Comment:** One commenter suggested that a chart be added to the text that states "nearly three quarters of all NPS crashes occurred within 33 parks."

**Response:** Thank you for your comment. Although we agree that a table with crash data by park unit would add additional information, the focus of this plan is on national scale issues. As such, the National LRTP provides summary information at the National scale.

**Comment:** Several commenters requested that the plan add in more specific projections, implications, and in-depth discussions about the effects of climate change on wildlife, visitors, and the parks' transportation assets.

**Response:** Thank you for your suggestions. The National LRTP includes a detailed list of various issues that experts have identified as possible challenges for transportation systems relating to climate change. The plan also includes an objective and performance measure to conduct vulnerability assessments of transportation infrastructure to better understand these potential risks and objectives and strategies to improve the consideration of natural and cultural resource considerations in all aspects of transportation. While the National Park Service recognizes the potential for widespread changes in wildlife, visitation, and other factors, we do not agree that the National LRTP is the appropriate venue in which to explore them in detail, particularly given that these impacts are covered by other NPS programs and are likely to vary widely across the 417 units of the National Park Service.

**Comment:** Multiple commenters asked that transit be mentioned in both the Asset Management and Investment Strategy chapters as a high priority need.

**Response:** Thank you for the observation. We agree that transit is an important piece of the transportation asset portfolio. Table 4-2 in the draft plan included all transit systems in the Highest Priority category. To further emphasize this, additional mentions of transit as a high priority were added in the Investment Strategy chapter and elsewhere where we thought additional emphasis may be helpful.

**Comment:** One commenter suggested that the section titled "National LRTP Development Process" further describe the outreach conducted for public review and comment, as described in the introduction.

**Response:** Thank you for the suggestion. We have added additional text to this section that describes the outreach efforts in more detail. In summary, the majority of the stakeholder outreach was internal among the many business units of the National Park Service in addition to the Federal Highway Administration. The public comment period which is summarized in this document represents the process for external comment and review.

**Comment:** A commenter suggested that the plan would benefit from a more in-depth discussion of how the National LRTP will be implemented and applied within regions and across different park units so that regions and units better understand their role(s) in the plan's implementation.

**Response:** Thank you for your suggestion. Page 7 of the National LRTP describes how the National, Regional, and Unit level LRTPs relate to each other. As the first cycle of LRTPs move into a performance monitoring and implementation phase, the National Park Service plans to update guidance on how LRTPs should be aligned to streamline performance reporting and future updates. Additionally, the Park Service is currently preparing a performance management plan which provides guidance to regions on how to align their respective updates with the goals and metrics of this national plan.

**Comment:** One commenter recommended better describing the linkages between the performance measures and objectives within the plan.

**Response:** Thank you for your comment. The National Park Service chose to focus on a limited set of performance measures for which national-scale data is available. They are not always directly linked to discrete objectives. Instead, performance measures that best fit the overall emphasis of each Goal Area were chosen. In several cases the performance measures are designed to measure progress toward the development of management systems, as opposed to desired outcomes. This is because in many cases national-scale data was not available. However, the creation of management systems in these Goal Areas is designed to collect data which may inform future performance measures in an update to the National LRTP.

**Comment:** One commenter requested that the discussion of the Roadway Inventory Monitoring program in the Asset Management chapter include how often FHWA inspects the roads.

**Response:** Thank you for your comment. The Roadway Inventory Program conducts ongoing inspections of most NPS paved roads and parking areas. Inspection frequency varies based on a variety of factors, with a complete cycle of inspections taking between 4-6 years on average. The focus of the discussion of pavement condition is on the overall servicewide trends. We do not agree that additional detail on the inspection cycle or methodology is needed to understand the key points that pavement condition is monitored using industry-standard techniques and that pavement condition is forecasted to decline slightly from recent gains.

**Comment:** One commenter suggested that it is not clear in the safety Goal Area what strategies NPS will pursue for non-motorized users. Another commenter inquired whether the People Powered Park Initiative or the NPS Active Transportation Guidebook could be added to the Visitor Experience or Safety Goal Areas to further highlight the efforts NPS is working on to increase safe access for non-motorized users.

**Response:** Thank you for your comment. The National Park Service is committed to the safety of all visitors, including users of non-motorized transportation options. The Safety Goal Area chapter was revised to clarify that non-motorized users are included in objectives to reduce serious and fatal transportation-related injuries. The guidebook and initiative referenced in the comments are not yet published or official NPS programs and thus have not been added to the discussion of baseline conditions in the plan. These resources and initiatives may be included in future updates when appropriate.

**Comment:** One commenter noted that the introduction of the Transportation Finance chapter notes that the NPS estimates a \$1.5 billion per year shortcoming in funding, but also noted that the document fails to mention for how long this level of funding would be required.

**Response:** Thank you for your observation. The National Park Service estimates that \$1.5 billion per year would be needed for 6-10 years to meet all identified transportation needs; this information was added to the plan

**Comment:** One commenter noted that a strategy in the Transportation Finance chapter recommended “creating a system of record to track planned and actual maintenance spending,” and asked how that would be different than FMSS.

**Response:** Thank you for your observation. You are correct that FMSS is the system of record for tracking planned and actual maintenance spending. This strategy was revised to reflect the need to develop a regular report examining planned vs. actual maintenance spending, drawing from FMSS data.

**Comment:** One commenter asked that the discussion of traveler information be made more clear, noting that the draft version mentions “travel time” and “locations of congestion,” which indicates (instead of clearly stating) that predictive traveler messaging be provided by the Parks websites.

**Response:** Thank you for your observation. The discussion of the essential traveler information performance measure was revised to more clearly define the nine essential elements of traveler information included in the performance measure.

### ***3. Requests to Clarify Existing Data, Figures, or Tables***

**Comment:** Multiple commenters discussed the need to clarify that the plan has been constrained within current funding levels.

**Response:** Thank you for the suggestion. We have added more specific information about how the National LRTP is fiscally-constrained within forecasted funding level in the conclusion of the document.

**Comment:** One commenter suggested that Figure 2-1 in the National Transportation Strategy chapter, which illustrates the principles of the NPS investment strategy, was unclear.

**Response:** Thank you for your comment. Figure 2-1 has been revised to clarify that all three principles apply to the full amount of forecasted funding and that the three principles are combined and reflected in the overall investment strategy.

**Comment:** One commenter noted that the data in Table 5-2 do not correspond with those in Table 3.1.

**Response:** Thank you for your observation. Data in these tables did not align exactly because of differences in rounding and the number of categories used. Table 5-2 was revised to match the approach used in Table 3-1.

#### ***4. Requests to Add New or Expanded Content to the Plan***

**Comment:** Multiple commenters proposed adding new or significantly expanded Resource Protection content to the plan, including night sky protection and light pollution, specific strategies to ensure resource and wildlife protection, adding specific performance metrics to INSTEP, and vegetation management at designed viewpoints.

**Response:** Thank you for your suggestions. We agree that these topics are important considerations for NPS transportation. However, at the time of the plan's development, we feel these were not sufficiently established in national policy, guidance, or appropriate baseline information to be included in this plan's framework. We look forward to working with resource protection experts and stakeholders during the performance monitoring and implementation of the plan to discuss how more specific issues like these, and their related data and information, can be better addressed in future updates to the National LRTP.

**Comment:** Multiple commenters suggested incorporating the Federal Highway Administration's Eco-Logical approach in improve agency cooperation.

**Response:** Thank you for the suggestion. The Department of the Interior is a signatory of the Eco-Logical document, and the National Park Service practices a landscape-scale conservation approach when appropriate. A GIS-based, landscape-scale planning tool has been developed and is being tested in the development of several regional LRTP's (the Transportation Resource Stewardship Planning Tool –TRSPT), and results of that testing will be reported, as appropriate, in subsequent performance reporting and LRTP updates. We have also added references to Eco-Logical and landscape-scale approaches to conservation to the Resource Protection chapter.

**Comment:** One commenter expressed their disappointment that the plan does not discuss the 'burden on the National Park Service' on the maintenance of the five parkways in the DC metropolitan area.

**Response:** Thank you for your comment. The National Capital Region of the National Park Service is currently developing a Regional LRTP which will address the NPS parkways in the Washington D.C. metropolitan area. The National Capital Region LRTP is scheduled to be released in 2018, and appropriate results from that plan will be incorporated into future National LRTP updates.

**Comment:** One commenter asked that the plan define a minimum Wildlife Vehicle Collision and traffic volume threshold which would trigger the Service to review wildlife mitigation strategies.

**Response:** Thank you for your suggestion. Such a strategy will require further definition of appropriate best management practices upon which such a policy might be based. We look forward to working with resource protection experts during the performance monitoring and implementation stage to explore how issues like this might be better reflected in future updates to the National LRTP as well as regional and unit-level LRTPs.



**Comment:** Multiple commenters suggested adding in opportunities for conducting Citizen Science Projects in National Parks.

**Response:** Thank you for this suggestion. We have added references to the use of Citizen Science in the Resource Protection Goal Area chapter of the plan, and we are further exploring implementing a citizen science data collection mobile app to report and track wildlife-vehicle incidents.

**Comment:** One commenter suggested incorporating some of the provisions promulgated in the DOI's Departmental Manual 600 DM 6, *Implementing Mitigation at the Landscape Scale*, into the NLRTP.

**Response:** Thank you for your suggestion. We have added references to applicable provisions to the NLRTP in the Resource Protection chapter, including within the objective that describes the process of incorporating natural and cultural resource considerations into all aspects of the transportation decision-making process (page 82). We added a new strategy specifically related to incorporating landscape-scale ecosystem planning into transportation planning.

**Comment:** Several comments were made about wildlife vehicle collision data, its availability to the public, and suggestions of better ways to collect the data.

**Response:** Thank you for your suggestions. We acknowledge that collecting wildlife-vehicle collision data is challenging and is an evolving practice. Some NPS-specific approaches already exist, and are covered under other program areas. Of note, the National Park Service is currently working with the Fish and Wildlife Service to pilot a new tool to improve wildlife-vehicle collision data collection. Information related to this pilot will be shared with the public once it has sufficiently advanced. Information and findings from this pilot may ultimately, and will inform future updates to the National LRTP as well as regional and unit level LRTPs.

**Comment:** Several comments were received about citing existing Executive and Secretarial Orders or management policies where related content is discussed within the plan.

**Response:** Thank you for your suggestions. We have added several citations which reference these orders and policies throughout the Plan where we feel it was most appropriate to do so.

## Conclusion

The National Park Service thanks the public for reviewing its first National Long Range Transportation Plan. We look forward to continuing to work alongside citizens, subject matter experts, and other key stakeholders to implement and periodically update this plan. NPS will begin work to establish and implement the performance monitoring protocols described in the NLRTP and to coordinate within the agency and with partners to advance the goals of this plan immediately after its official adoption.

The NLRTP represents a living document and plan. We invite interested parties to remain involved in the evolution of the Parks Service's Transportation planning goals and developments throughout this process. Please visit the [NPS Long Range Transportation Planning website](#) to learn more, or check the [NPS Planning, Environment & Public Comment website](#) to view items and proposals currently open for public comment.