

**Acadia National Park**  
**Draft Transportation Plan / Environmental**  
**Impact Statement**

**Comment Summary Report**

**August 15, 2018**

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## SUMMARY

Acadia National Park's Draft Transportation Plan and Environmental Impact Statement (EIS) first became available for public review and comment beginning on Thursday April 26, 2018. Opportunities to comment were advertised through press releases, posts to the park website, targeted outreach, and an announcement on the National Park Service (NPS) Planning, Environment, and Public Comment (PEPC) website. The public review and commenting period ended June 26. A total of 489 unique correspondences were received via e-mail, mail, in person at meetings and information sessions, and on the PEPC website. An additional 5,750 form letters were submitted to the park (these represent one unique correspondence). All non-PEPC correspondences were entered into the PEPC website for analysis.

Members of the public were given opportunities to share comments via letter, e-mail, fax, online, in person, and virtually. Public Information Library sessions were held May 14 through 16, 2018, reaching a total of 108 participants. Library sessions were held at Southwest Harbor Public Library (Southwest Harbor, ME), Northeast Harbor Library (Northeast Harbor, ME), and Jesup Memorial Library (Bar Harbor, ME). These meetings were streamed online courtesy of Friends of Acadia, with more than 6,000 participants viewing each session. Open House Public Comment sessions were held May 22 and 23, 2018, reaching a total of 70 participants. The open house events were held in the evenings at Mount Desert High School (Bar Harbor, ME) and at Peninsula School (Prospect Harbor, ME). Public comments from each meeting are summarized at the end of this report. Additionally, the park held briefings at town council or board of selectmen meetings in Bar Harbor, Mount Desert, Trenton, Tremont and at the League of Towns. Briefings were also held with the Bar Harbor Chamber of Commerce board, the Ellsworth Chamber of Commerce, the Acadia Regional Chamber of Commerce board, Maine Department of Transportation, Maine Office of Tourism, Maine State Historic Preservation Office, Maine Tourism Association.

To widen the geographic span of public participation, a virtual information was also held online. The virtual information session was held in the evening of June 13, 2018, with a total of 15 participants. Three videos were also created to reach a wider network of the public. The videos were posted on YouTube, reaching over 10,000 views. To inform the public of the process, a newsletter describing the context of the plan and how to comment was posted to the PEPC website and made available in paper copy at the public open house events as well as at key locations in the park. This newsletter provided a summary of park goals, purpose and need for the Acadia National Park Draft Transportation Plan and Environmental Impact Statement, a summary of the National Park Service alternatives, and an overview of the planning schedule. During all of the outreach events, members of the public were invited to submit comments on the PEPC website.

The National Park Service collected public comments in order to understand the public's perspectives on the draft plan. In this National Environmental Policy Act

(NEPA) process, thoughts and ideas from individuals, organizations, and agencies are analyzed and considered equally. For this reason, the unique content of comments, rather than the number of times a comment was received, will be used to make refinements to the final plan. This comment summary report summarizes the content from the public comments received during the comment period.

## **PUBLIC COMMENT ON DRAFT PLAN AND ENVIRONMENTAL IMPACT STATEMENT**

### **Correspondence Distribution**

The following table provides the geographic distribution of public comments that were submitted directly to the PEPC website or to the park (as of July 2, 2018). The following table depicts the distribution of these public comments by zip code.

**Table 1. Distribution of Correspondences By State**

<b>State</b>	<b>Percentage</b>	<b>Number of Correspondences</b>
Maine	35%	173
New York	7%	36
Pennsylvania	5%	25
California	5%	22
Florida	3%	17
Massachusetts	3%	17
Colorado	3%	14
New Jersey	3%	13
Ohio	2%	12
Washington	2%	12
Virginia	2%	11
Indiana	2%	8
North Carolina	2%	8
New Hampshire	2%	8
29 Other States	23%	113
<b>Total</b>		<b>489</b>

In addition to general public comments, the National Park Service received letters from official representatives of the following agencies and organizations:

- Acadia Institute of Oceanography
- Acadia Mountain Guides
- Adventure Cycling Association
- Atlantic Climbing School
- Bar Harbor Chamber of Commerce
- Carnival Corporation
- Cruise Lines International Association
- Destinations North America
- Friends of Acadia
- Maine Coast Heritage Trust
- National Parks Conservation Association
- Natural Resources Council of Maine
- Royal Caribbean Cruises Ltd.
- Sierra Club Maine
- Tom Crikelair Associates
- Town of Bar Harbor

## **Definition of Terms**

**Correspondence.** A correspondence is the entire document received from a commenter. It can be in the form of a letter, written comment form, note card, or open house transcript.

**Comment.** A comment is a portion of the text in a correspondence that addresses a single subject or issue. It could include such information as an expression of support or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis. The correspondence identification number is provided at the end of quotes in brackets.

**Comment Summary.** A grouping that is centered on a common subject. Comment summaries combine similar comments. Representative quotes from the comments may be presented to create a comment summary.

## **List of Acronyms**

DEIS	Draft Environmental Impact Statement
FEIS	Final Environmental Impact Statement

GMP	General Management Plan
NEPA	National Environmental Policy Act
NPS	National Park Service
PEPC	Planning, Environment, and Public Comment
ROD	Record of Decision

## **ANALYSIS METHODOLOGY**

The letters, e-mails, faxes, and public meeting comments represented in this Comment Summary Report were analyzed using the PEPC database, which was developed by the National Park Service and is used servicewide.

Correspondence received during the comment period was analyzed in a series of stages. Staff read each piece of correspondence to identify discrete points expressed by the author, each of which is considered to be a “comment.” Each comment was assigned a code in order to associate that comment with a particular resource topic or element of the plan (such as parking or reservations). Staff derived code categories from an analysis of the range of topics covered in relevant present and past planning documents, NPS legal guidance, and the contents of the correspondence. The coding structure enabled comment organization by topic area. Comments that discussed multiple issues (e.g., ferry service and bike safety) were assigned multiple codes. Once coded, individual comments were assigned subcategories to capture specific concerns and issues. This analysis yielded approximately 1,200 individual comments from the 489 correspondences.

The coded comments are stored in a database where they can be quickly accessed using a variety of query and reporting tools. Comments were reviewed as “in-scope” or “out of scope,” as well as “substantive” and “non-substantive.” In-scope comments were those that addressed the structure and findings of the Acadia National Park Draft Transportation Plan / Environmental Impact Statement, while out-of-scope comments included those comments addressing issues unrelated to the Acadia National Park Draft Transportation Plan / Environmental Impact Statement. Substantive comments are those comments that:

- question, with reasonable basis, the accuracy of the information in the DEIS
- question, with reasonable basis, the accuracy of the environmental analysis
- develop and evaluate reasonable alternatives other than those presented in the DEIS
- cause changes to the proposal or alternatives
- suggest factual corrections

Consistent with Council on Environmental Quality (CEQ) guidelines and NPS *Management Policies 2006*, comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.

Similar substantive comments were grouped together to develop a unique “concern statement.” The concern statement summarizes the main points or common themes expressed across one or more substantive comments. Such statements are derived from and supported by quotes from original correspondence. These quotes are stored in the PEPC database. Each statement is worded to give decision makers a clear sense of what action is being requested. Public concern statements are also intended to help guide the reader to comments on specific topics of interest. They do not replace the actual comments received from individuals. Rather, concern statements should be considered as one means of accessing information contained in original correspondence and the coded comment database.

The concern statements were framed to express the action requested of the National Park Service. The concern statements were then screened to determine whether the statement involved a request for further clarification or modification of the proposed action. In the latter case, concerns were brought to the interdisciplinary planning team or IDT for further deliberation. As a result of this deliberation, modifications will be made to the alternatives considered, to the evaluation of impacts, and in particular, to the content of the agency preferred alternative and proposed action.

Substantive comments guided the development of concern statements and subsequent changes to the Acadia National Park Draft Transportation Plan / Environmental Impact Statement. The NPS responses to concern statements will detail these changes. Other responses from the NPS will point to sections of the Acadia National Park Draft Transportation Plan / Environmental Impact Statement for further information or clarification. Some responses will provide background or relevant information in park policy that addresses the substance of the comment, but do not contain references to document revisions. Other responses will explain why comments were considered, but ultimately dismissed from further analysis. No concern statements or responses were or will be generated for non-substantive comments (such as personal opinion) or comments that misrepresented the proposed action.

All correspondences received during the public comment period were considered and are now part of the administrative record for this plan.

## **SUBSTANTIVE COMMENTS BY ISSUE AREA**

### **Planning Process and NEPA**

**Alternatives.** When an individual expressed preference for an alternative in their comments, there was expressed support for all alternatives across the range of



alternatives. For those that expressed support for a specific alternative, there was the least support for alternatives A and B and more support for alternative D. However, most of these individuals expressed support for the preferred alternative (alternative C).

**Concern: Role of Schoodic into the Plan.** Commenters noted that much of the plan does not mention Schoodic and requested it be modified to do so to be more comprehensive.

**Concern: Dismissal of Transit Only Alternative.** Commenters disagreed with the rationale for dismissal of a “transit only” alternative on page 48 of the draft plan noting that the concept works at other parks like Denali National Park and should therefore also work at Acadia.

**Concern: Goals and Desired Conditions.** Commenters suggested various improvements to the goals and desired conditions for the park’s fundamental resources and values, including increasing their prominence in the document and clarifying the relationship between goals and desired conditions. Commenters also suggested the National Park Service explicitly state in the document that where there is a conflict between stated goals, the preservation of park resources must be given priority. Commenters suggested a new goal that explicitly calls for a reduction of private vehicle use in the park with expanded options for cyclists, pedestrians, and public transportation. Commenters also suggested broadening the plan’s seventh goal relating to integrating with other local transportation planning efforts to also include the need to integrate with regional and subregional transportation planning efforts in Maine and the Northeastern United States. Commenters noted the importance of linking the park’s transportation systems with regional systems including rail, ferry, and bus services.

**Concern 69: Level of Detail.** A commenter felt that the National Park Service needed to add additional detail to the plan alternatives in order to allow a more complete analysis of impacts and a reasoned choice between them.

**Concern 182: Release of Public Comment.** Commenters urged the National Park Service to make all submitted public comments on the transportation plan available for public review.

**Concern 184: Implementation Timeline and Costs.** Commenters suggested that the National Park Service should include in the plan a timeline for implementation as well as the associated costs of each proposed action.

## **ACTIONS AND ALTERNATIVES**

### **Parking**

The National Park Service received many comments about the various parking lot proposed changes. Some commenters were in support of reducing parking overall, while other commenters encouraged the park to expand parking by building new lots

and/or not removing current lots. The concern statements related to this topic are the following:

**Support for Increases in Parking.** Some commenters thought the park should add new parking lots and expand parking lots at popular destinations, rather than adopting a plan to manage visitation. Some specific locations suggested included Great Head, Acadia Mountain, Satterlee Pit, the Tarn, Sieur de Monts, Parkman and Brown Mountains, Wonderland, and Ship Harbor. Other commenters suggested the National Park Service should consider a multilevel parking garage (possibly underground or floating, possibly several, including one at the base of Cadillac Mountain, at Sand Beach, and Bluenose Ferry Terminal) to accommodate more vehicle parking.

**Support for Reductions in Parking.** Some commenters suggested that parking spaces should be removed. Commenters specifically suggested that half of the parking lot at Cadillac Mountain be removed and the area restored to natural conditions. Other commenters noted that many existing lots are rarely full and that visitor access should be accommodated by other means, including more public transit. Other commenters added that the National Park Service should be prioritizing resource protection over accessibility to visitors. Other commenters noted that if parking is expanded, then some existing parking should be removed because increasing the amount of available parking will increase visitation overall.

**Management of other Areas Outside the Park Loop Road.** Many commenters felt that the plan should include specific strategies for management of parking and congestion in other areas of the park outside the park loop road. Specific suggestions were provided for strategies at Acadia Mountain, Brown Mountain, and elsewhere on the western side of Mount Desert Island.

**Retention of Existing Eagle Lake Parking Lot.** Commenters expressed concern that the rationale for proposed changes at Eagle Lake were not explained well in the plan. They also noted that the existing parking and restroom at Eagle Lake is better positioned and closer to the carriage roads than Liscomb Pit, particularly for people with limited mobility, for winter users on skis and snowshoes, and for visitors portaging canoes and kayaks. Commenters suggested that the National Park Service retain the existing parking and facilities at Eagle Lake even if the Liscomb Pit area is converted into a parking lot as removing these facilities would be counterproductive for visitors and would not address the problems of congestion.

**Management of Bubble Pond.** Some commenters thought the park should reopen the Bubble Pond parking area for better access to trails and for kayakers who need short distances for portage.

**Management of The Jordan Pond Parking Lots.** Some commenters felt that parking at Jordan Pond should remain first-come, first-served because of access to carriage roads and trails.

**Increasing Bus Parking.** Commenters noted that the plan relies on an increase in public transportation, additional parking spaces for buses may be necessary.

**Support for Resource Sensitive Parking Lot Design.** Some commenters suggested any new parking lots should be built with drainage-friendly materials, should minimize impact on the environment, and should avoid sensitive habitats such as wetlands. New lots should only be built as a last option to solve the park's issues with congestion.

**Concerns with the Liscomb Pit and Hulls Cove Parking Expansion.** Commenters thought the revegetation efforts proposed in the plan associated with the removal of some roadside parking would represent positive impacts to natural resources; the new parking lot expansions at Hulls Cove and Liscomb Pit represent larger impacts to similar resources than what would be restored.

**Support for Liscomb Pit and Hulls Cove Parking Expansion.** Many commenters indicated support for parking lot expansions at Liscomb Pit and Hulls Cove. Some commenters also suggested that the proposed new lot at Liscomb Pit be designed larger in order to absorb the demand for use.

**Support Removal of Parking Management Stones.** Some commenters felt that rather than reservations or new parking, the park should focus on decentralizing visitation away from heavily visited areas, including by removing existing barriers to parking. Some areas of roadside parking could be made permanent.

## **Bicycle and Pedestrian Access**

**Support for Improving Bicycle Access.** Commenters thought the National Park Service should focus more effort on improving bicycle and pedestrian access to the park, including the consideration of a dedicated bike lane on the loop road, more bike racks at trailheads and on Island Explorer buses, expanded bicycle express routes (location and time/season) on the Island Explorer, bicycle rental opportunities, bicycle-specific maps, electric bike charging stations, and continuation or expansion of car-free days. Commenters suggested that the National Park Service should also improve safety for cyclists by painting white lines to demarcate the driving lane so these changes work with emerging technologies such as a lane departure warning system. A per-bike fee could help cover the costs of expanded service. Commenters also noted that the plan implies that managing vehicle access with reservations could cause more visitors to walk or bike, increasing possibilities for unsafe interactions with vehicles when, in fact, more bicyclists improve road safety.

**Support for Limiting Bicycle Access.** Some commenters noted that the plan lacks a discussion of limiting, managing, or prohibiting cycling, particularly along Cadillac Mountain Road during busy times and days.

## **Roadway Congestion**

**Drive Through Use.** Commenters requested that the final selected action should allow for some pass-through (no parking) access to Ocean Drive. This would allow scenic driving to still occur for those who don't want to park. There was concern that without a drive through only pass, local residents would not be able to continue the tradition of dropping off / picking up family or friends at trailheads or beaches.

**Both Support and Opposition to Changes in Travel Direction.** Some commenters affirmed that there were benefits to having one-way direction of travel on the Park Loop Road. Others were concerned that the strategy of making the road one way in the counterclockwise direction (as in alternative D) would increase the driving distance to some of the most popular areas of the park. Commenters also suggested making Lower Mountain Road from Jordan Pond House to Cadillac Mountain one way in the northbound direction. These commenters noted that this action was neither considered or explicitly dismissed in the plan. Another commenter suggested that allowing buses to enter the Loop Road at Sieur de Monts (clockwise travel) or Otter Cliff Road (counterclockwise travel) and/or providing beach access from Schooner Head Road and the Great Head Trailhead could provide a more direct way to travel between Bar Harbor and Sand Beach/Ocean Drive. An additional commenter noted that one-way travel will make things more difficult for staff and volunteers because they will have to travel the full loop to check on sites or closed gates (for example). Another commenter noted that further research should be done regarding the conversion of the Park Loop Road to one-way travel between Jordan Pond House and Cadillac Mountain.

**Support for Further Reducing or Eliminating Private Vehicle Use.** Some commenters felt that the plan doesn't go far enough to reduce congestion and that further vehicle restrictions should be considered to eliminate congested roadway corridors beyond what is described in the alternatives. Some of these commenters expressed concerns that managing some corridors or lots will lead to increased roadway congestion in other areas of the park. Other commenters suggested the National Park Service restrict all private vehicle use up Cadillac Summit Road, citing that it would be more fair if everyone had to use Island Explorer or another tour service to reach the summit. There was support for a similar transit-only access alternative to both Schoodic and the rest of the Park Loop Road. Commenters were also concerned that by continuing to allow private vehicle access at new points of entry, congestion will just be moved to these new bottlenecks and not necessarily eliminate the congestion itself.

## **Shuttle and Transit Services/Island Explorer**

**Support for Expanded Island Explorer Service.** Commenters expressed a variety of ways that Island Explorer service could be expanded on both Mount Desert Island and Schoodic. These included expanded park-and-ride lots, new routes, additional express routes, expanded bike shuttle routes, and additional shuttle stops. Specific suggestions for new Park-and-Ride lot locations included Gateway Center, central Mount Desert

Island, Northeast Harbor, Southwest Harbor, and the west side of Mount Desert Island in general. Commenters noted that these new hubs could help disperse crowds away from busy areas.

**Concerns and Ideas with Expanded Island Explorer and Commercial Transit.**

Some commenters felt that increasing commercial and public transit options will only worsen the problem of crowding and overuse in the park. Other commenters questioned the feasibility of expanding Island Explorer citing shortages in bus drivers as well as suggestions for how to address these shortages. Specifically, commenters suggested recruiting local school buses/drivers or managing the expansion of Island Explorer through using smaller vehicles such as vans that didn't require drivers to have a commercial driver's license, thereby expanding the pool of potential drivers. Other suggestions included increasing wages for drivers and offering housing. Lastly, some commenters felt that the riding the Island Explorer should also be subject to the reservation system.

**Support for Charging Island Explorer Ridership Fees.** Some commenters felt that fees should be applied to Island Explorer ridership, but at a rate less than a reservation for private vehicles to encourage Island Explorer service over private vehicle use.

**Shuttle Service to Cadillac Mountain.** Commenters suggested that the National Park Service should provide shuttle service to the Cadillac summit originating from one or multiple stops or communities. This could be arranged through a concession or through an expansion of the Island Explorer. Visitors could be required to use this service, or it could be provided during peak times/seasons, and the Cadillac Summit Road may be closed to private vehicles. One commenter opposed allowing concessioners to have access to Cadillac Summit Road if no parking will be available. Some commenters suggested making shuttles the only form of transportation that could be used to access key locations such as Cadillac Mountain and Jordan Pond, while another proposed that the park use the same type of vans used by the Eagle Lake bike shuttle. Other commenters suggested that shuttles offer a "hike up, ride down" option (or vice versa). There was also a suggestion to allow a concessioner to operate a shuttle between Hulls Cove and Cadillac Mountain to serve cruise passengers. Some commenters suggested generally increasing the Island Explorer service and limiting commercial buses to tours and interpretive services.

**Concerns with the Village Green Bus Hub.** Some commenters suggested that the National Park Service, in cooperation with Downeast Transportation and the towns, should relocate the Island Explorer's transit hub away from the Village Green in downtown Bar Harbor due to lack of parking, as well as the congestion that slows bus service.

**Accessibility and Island Explorer.** Some commenters felt that the Island Explorer buses need to be made more accessible. People with mobility challenges find them difficult to use because, for example, the steps are too steep. Priority should be given to those with disabilities.

## **Right Lane Parking**

**Support and Opposition to Removal of Right lane Parking.** Commenters felt that the National Park Service should immediately eliminate all right lane parking as a part of the plan. Doing so will improve safety for cyclists and pedestrians, and help eliminate congestion that detracts from the visitor experience. Commenters noted that previous planning efforts have proposed the elimination of right lane parking at a future date, but that date has never come. Other commenters suggested that the National Park Service incrementally remove right lane parking, starting first in areas that are the least safe, or are causing congestion. There was a suggestion that in lieu of right lane parking, new parking, picnic, and picnic areas be constructed between Otter Creek and Seal Harbor.

Others suggested that the park should not eliminate right lane parking, it has been used for many years to provide space for RV parking, relieve pressure on over-filled parking lots, provide access to trailheads, and provide relatively close parking for people with limited mobility.

## **Vehicle Size Limits**

**Support for Vehicle Size Limits.** Commenters expressed strong support for limiting the height and length of oversized vehicles entering the park including tour buses, RVs, and campers. Commenters noted that buses and RVs currently entering the park are too big, sometimes taking one and one-half or two lanes creating unsafe conditions for drivers and bicyclists. Commenters suggested that only vehicles that can fit on a regular lane, make the road turns, pass under any Park Loop Road bridges, and fit in a regular parking space should be allowed. In particular, Cadillac Mountain was noted by many commenters as an area where oversized vehicles should not be allowed due to the narrowness of the road and the difficulty of large vehicles making turns there. Multiple implementation suggestions were made including adding signs at the park entrance with maximum vehicle size dimensions, accelerating the phase-in schedule for vehicle size limits, adding an Island Explorer route to the summit of Cadillac Mountain, as well as working with local tour companies to provide access to Cadillac Mountain using smaller vans or minibuses.

**Modification of Bridges for Commercial Vehicles.** One commenter suggested that the National Park Service excavate and lower the road grade under bridges in order for large coach buses to safely pass underneath them.

**Role of New Bus Technology.** One commenter noted that newer 45-foot-long buses have rear wheels that make them more flexible in maneuvering turns. It was requested for this information to be taken into account when considering vehicle size limits.

**Number of buses on the road and associated passenger capacity.** Some commenters were concerned that by decreasing the size of the buses allowed in the park, it would double the number of smaller buses required to transport the same number of visitors and increase the number of parking spaces required. There was also concern that

transportation companies would not have enough capacity to support shore excursion programs.

**Width of smaller buses.** Commenters expressed concern that shorter buses may not translate into narrower buses, which would not alleviate the problems on Cadillac Mountain Road.

**Continue use of oversize vehicles at certain locations.** A commenter suggested that current commercial vehicles in high use areas such as Ocean Drive and Jordan Pond be allowed to continue operation to support current traffic flow.

**Emissions.** Commenters expressed concern that by decreasing the size of commercial vehicles allowed, emissions would be doubled. There was a suggestion that tour companies use electric vehicles, and it was also suggested that the Island Explorer vehicles use a different engine.

## **Communications**

Commenters suggested a variety of communication strategies the National Park Service could employ to help with implementing the plan. These included creating physical signage, coordination with lodging providers, and apps that would provide information about reservations, crowding, congestion, and parking, as well as the website indicating which roads and rest facilities are open or closed throughout the year, providing signage displaying information about how bicyclists and hikers can show they have paid their entrance fee, providing educational material related to multiuse (“Rules of the Road”) to be made available to park visitors, especially considering the potential for increased buses and vehicles in the future, making Junior Ranger materials available at transit hubs for use with Island Explorer and at areas with lower visitor densities.

Additionally, some commenters suggested that the National Park Service should install digital boards at park entrances that would display information about crowding and parking availability at key locations, while an additional commenter indicated that they would also be needed at intersections where visitors will be making decisions based on the availability of parking and reservations. Some of these locations include: the Sieur de Monts entrance, Bar Harbor Visitor Center, Acadia Gateway Center, Hulls Cove Visitor Center, Cadillac Mountain Entrance Station, and at the intersection of Eagle Lake Road Route 233, Route 3, and Route 198.

**Concerns over Too Much Signage.** Commenters cautioned that too many directional and parking signs start to negatively impact the viewscape of the park.

**Cell phone coverage.** Commenters expressed concern and support to the proposal of improving cellular service throughout the park. There was concern that improving connectivity would significantly change the ability to disconnect from the modern world and enjoy the natural and serene nature of the park. Furthermore, there was concern that improving connectivity would require additional infrastructure including

antennas that would affect the historical landscape of the park. Improving ability to disseminate park congestion conditions as well as supporting visitor safety were cited as reasons to support improved cellular service in Mount Desert Island. It was also noted that adequate cell phone coverage should be in place in order for increased taxi and on-demand ride services be supported. One commenter suggested using cell towers mounted on trailers that could be installed in the park seasonally.

## **Enforcement**

**Reservation System Enforcement Concerns.** Commenters cautioned that the creation of a reservation system will confuse visitors and lead to negative interactions with park staff. These commenters noted that there is already poor enforcement of existing parking rules and little enforcement of compliance with park pass requirements. Some commenters felt that the National Park Service should take more action enforcing current regulations, including more ticketing and towing, before enacting a plan. Many vehicles in the park currently do not have a pass, and buses idle in violation of the rules to protect air quality. If the park enforced the entry pass requirements and other regulations, traffic and parking issues would be solved.

**Speed Limits.** Commenters suggested strategies to reduce vehicle speeds including use of permanent rumble strips to slow traffic, particularly where trails from town meet with the Park Loop Road. In some locations, commenters felt that the National Park Service should consider speed limit reductions. Specific locations noted include near Acadia Mountain parking and Route 102.

## **SUGGESTIONS AND PREFERENCES FOR NEW ALTERNATIVES AND STRATEGIES**

**Queuing on Cadillac Mountain.** Some commenters suggested the park should use a one-in, one-out queuing method for parking at Cadillac Mountain, rather than reservations. Such queuing systems should also be considered for other sites including Jordan Pond House and lots not on the Park Loop Road such as Echo Lake.

**Hand-Carried Watercraft Access to Boat Trailer Spaces.** Commenters thought that the National Park Service should allow vehicles with hand-carried watercraft, such as canoes and kayaks, to park in designated spaces near the boat launches at the Jordan Pond North Parking Lot and the parking lot at the north end of Eagle Lake. Commenters noted that a significant portion of boat use at both Jordan Pond and Eagle Lake is by hand-carried craft (canoes or kayaks) and these users have a physical limitation on how far they can carry their crafts.

**Expand Vistas.** Commenters suggested the National Park Service should remove trees and vegetation along Lower Mountain Road to clear larger vistas of Jordan Pond for tour bus passengers. Doing so wouldn't require tour bus operators to slow down as much as they do now to view narrow vistas and improve traffic flow on Lower Mountain Road.



**Close Lower Mountain Road.** Some commenters thought the National Park Service should close the southern end of Lower Mountain Road past the overlook parking lot. Allowing bikes, pedestrians, and shuttles only on the closed section would allow better use of the Overlook parking lot.

**Changes to Alternative D.** Commenters felt the National Park Service should modify alternative D to reroute the Park Loop Road between Stanley Brook Road and Wildwood Stables onto a gravel roadway paralleling the park loop road. Doing so would mitigate the need for a separate parking reservation at Jordan Pond in this alternative. Commenters also suggested that alternative D should be modified so that the road from Hulls Cove Visitor Center to the State Route 233 / Eagle Lake Road entrance would be two-way rather than one-way in a southbound direction as is currently stated. Routing Island Explorer buses back through Bar Harbor town streets would be too slow and expensive.

**Close Great Head Road.** Some commenters thought the National Park Service should close the Great Head Road and use it as a pedestrian and bicycle route accessing the Great Head trail system and Sand Beach.

**Autonomous Vehicles.** Commenters suggested that the National Park Service should consider the role of autonomous taxi vehicles as a means to replace all private vehicles in the park.

**Motorcycle and Scooter Parking.** Some commenters suggested the National Park Service should allow motorcycle or scooter parking areas with less restrictive parking reservation requirements. Other commenters were opposed to scooters and electric bikes, noting they've been detrimental to the character of other places where they are allowed.

**Remove the Causeway.** Commenters suggested the National Park Service should remove the causeway over Otter Cove and use a ferry instead.

**Meter Park Entry.** Commenters thought the National Park Service should meter entry into the park by allowing vehicles with even numbered license plates in on even days and odd numbered license plates on odd days.

**Establish Visitation Cap.** Some commenters noted that the National Park Service should manage congestion by limiting the total number of park passes sold each year, giving local residents priority in purchasing such passes.

**Parking Meters.** Commenters suggested the National Park Service should install parking meters or parking-time limit signs at parking lots to force turnover of spaces and keep costs down for visitors.

**Incremental Implementation.** Some commenters thought the National Park Service should incrementally implement the reservation system in order to apply lessons learned from initial lots to subsequent lots or corridors.

**Partial First-Come First-Serve Parking Lots.** Commenters suggested the National Park Service should consider only putting a certain percentage (i.e., 50%) of the parking lots in each lot on the reservation system rather than the entire lot.

**Rely on Improved Trip Planning Resources.** Commenters suggested the park should consider a real-time parking information system that allows visitors to know which lots are full and which are not before they enter Park Loop Road. This would be implemented instead of a reservation system to manage parking at the busiest locations in the park.

**Close Access.** Commenters suggested the park should manage entry more simply, similar to Baxter State Park, and should just close when full.

**Build Additional Recreation Facilities.** Some commenters thought the National Park Service should develop more visitor infrastructure such as hiking and mountain biking trails. Specific locations suggested included Bernard Mountain and Seal Cove Pond, as well as developing Thompson Island as a hiking and sunset viewing area.

## **Commercial Services**

**Support for Reducing or Removing Commercial Vehicles in the Park.** Commenters generally supported managing the number of oversized commercial buses in and around the park, or eliminating them from the park entirely. Among the reasons cited for these included safety, parking logistics, traffic, noise, pollution, impact on viewsheds and generally the need to alleviate existing conditions. There was a suggestion to implement vehicle size limits without limiting the vehicle passenger capacity and creating a threshold for the number of oversized tour buses that can enter the park at one time per day. Increasing the capacity of Island Explorer was preferred over increasing commercial traffic.

**Support for Identifying Commercial Vehicle Capacities.** Multiple commenters suggested that the National Park Service should consider creating a threshold for the maximum number of oversized commercial vehicles that enter the park at one time on any given day and indicate these in the final plan. Particular areas mentioned as needing more active park management of commercial tours and buses included the Park Loop Road and Cadillac Summit Road. Commenters also wanted additional detail on how commercial vehicles would be managed in the reservation system relative to limits on their use. It was further suggested that if demand for CUA reservations exceeds capacity, that a lottery system is implemented similar to the one used at Arches National Park and work with an outside consultant to manage these reservations as it is being done in Muir Woods National Monument. Others suggested that there should be no limit on the number of commercial operators.

**Support for not limiting commercial vehicle access to the park.** A comment submitted asked that the National Park Service not reduce or limit access commercial vehicle access to the park.

**New destinations for smaller commercial vehicles.** One commenter requested more details in the final plan on the areas envisioned for greater access to smaller commercial vehicles. These include more details on locations and the size of vehicles that would be allowed at these new locations. There was also a request to collaborate with the cruise industry to broaden access to areas of the park previously not accessible by oversized commercial vehicles.

**Feasibility of Smaller Buses.** Commenters voiced concern that transportation companies using smaller buses would not have another market where small buses could be used. This would potentially limit the financial viability of a business recapitalizing a bus fleet with smaller buses.

**Support for Removing Gift Shops and the Restaurant.** Commenters suggested that the park should close the gift shops at Cadillac Mountain and Thunder Hole as well as the restaurant and gift shop at Jordan Pond House and use the buildings as satellite visitor contact stations / covered bus stop / restroom facilities. Some commenters noted that the services provided at these locations are neither necessary nor appropriate. Multiple commenters suggested that these services be terminated once the current concession contract expires in 2023. Commenters noted these sites are already popular with visitors and that services offered at these locations contribute to extended visitor stays and crowding. Some commenters suggested relocating these services to the proposed new visitor center in Halls Cove to reduce visitor length of stay in those popular sites. Commenters noted the lack of need to have gift shops and restaurants in the park due to their availability in the surrounding towns and that Jordan Pond House Restaurant does not provide a traditional dining experience and those facilities are detracting from the historic landscape in that area. Finally, there was a suggestion to close all concession services in the park other than horse stables at Wildwood, once the contracts expire.

**Commercial Transit to Supplement Island Explorer.** A commenter suggested the National Park Service allow additional concession contracts for shuttles to move people around the park. The suggested service would be transportation only, without interpretive services, that would supplement the Island Express shuttle service.

**Safety concerns.** Commenters noted that having a vehicle on-site is necessary for climbing businesses as it can help during emergencies as well as can help adjust climbing plans to match client abilities, weather, and other climbing activities.

**Reservations for bus tours.** Commenters suggested that reservations for bus tours that serve popular destinations in the park be required.

**Taxi and On Demand Rider Services.** Commenters noted that if the park does not require reservations for taxis and cars for hire, and these vehicles transport the same number of passengers as a private vehicle, then there would not be any fewer vehicles entering the park and the visitor experience would not be improved. Commenters also

noted that these vehicles should be subject to the same commercial use authorization requirements as other commercial vehicles in the park.

**Enforcement and Education.** A commenter suggested educate CDL drivers on park rules and enforcing park rules if broken. There was also a request to limit the number of random document checks that commercial use authorization holders are subjected to, especially on Cadillac Mountain due to the delays these document checks cause to the operators running on tight schedules.

**Shuttle options.** Commenters made a suggestion to allow custom in-town pickups at Bar Harbor hotels by concessioners to avoid having them travel off the island to the Gateway Center. A commenter questioned the efficiency of shuttling visitors from the Bar Harbor pier to Trenton Gateway Center to the Island Explorer back to the park.

**Tour Bus Access to the Right Lane.** Commenters made a suggestion to allow tour buses to stop for one or two minutes in the right lane of the Park Loop Road to allow tour passengers to see interesting sights along the way.

**Additional Details about Concession Contracts.** Commenters requested additional details be provided about the potential concession contracts for commercial tour vehicles. Specifically, commenters were interested in the operating plans for concession buses, management of the volume and timing of buses, how it relates to the fee structure, and specific regulations for tours.

**Concessions contracting process.** A commenter recommended changing the concessions contracting process in order for the surrounding communities to have more of a say in the process and outcome. Specifically, local investment, knowledge and experience to be prioritized, and allow the community to provide input through the development of a concessions contract prospectus. Furthermore, more transparency was requested throughout the concessions process including allowing the community to weigh in on business proposals and opening the process to community feedback.

**Coordination on Implementation.** Commenters requested confirmation that there will be a transition period to allow companies to acquire smaller buses. Commenters suggested that vehicle size restrictions be implemented no earlier than 24 months or over a number of years from when a final plan is approved. Commenters noted that 2019 would be too soon to implement vehicle size restrictions. There was also a request for consistent and reliable business rules with the implementation of the plan as it will require significant investment from current operations. Finally, there was a request to consult with the cruise industry and commercial vehicle contractors prior to the release of the final plan to further discuss the implementation of the plan.

## **Reservation Systems**

When an individual expressed support or opposition for reservation systems in the park, there was more support than opposition to the concept of implementing these

systems in the park. Visitors were more in support of proposals to have reservations that allow for spontaneous departure (with no fixed duration of stay) than those proposals that have fixed duration of stay and exit time.

## **General**

**Parking Turnover.** Commenters wondered if reservations are implemented, will visitors park in the morning and hold the spaces all day. This means that fewer visitors will be able to see the park.

**Reservation System Design Characteristics.** Commenters had many suggestions for design characteristics of a reservation system. These suggestions included both online and telephone-based reservations, the ability to purchase in person at multiple locations (Gateway Center, kiosks in towns, etc.), and the development of a mobile device application that would show available reservations and allow for purchasing.

**Bulk Purchase and Re-Sales.** Commenters expressed concern that some individuals, groups, or businesses may purchase big blocks of reservations to ensure that they have access to the park during their stay on multiple days, but then only use one or two of the days, and thereby leaving portions of lots or corridors under-used. Commenters were also concerned about the potential individuals purchasing reservations with the expressed intent of reselling them for a higher price (also known as “ticket scalping”). Some suggested that prices should be sufficiently high to de-incentivize this behavior. There was also concern with allowing tour operators to have greater access to the park than the public and suggestion to maintain the first-come, first-served system.

**Short Term Reservation Purchase.** Many commenters affirmed the need to have a portion of reservations set aside for short-term purchase. Most commenters on this topic suggested that the short-term passes be available 48 hours in advance; some suggested up to a week in advance, and others suggested short-term passes are held until a few hours in advance. Commenters expressed a desire for the plan to be more explicit about the intervals when reservations would be available. Other commenters, suggested the National Park Service should consider allowing temporary, spontaneous additional vehicles into areas without a reservation if the reservations are undersold for that day or time or if monitoring of traffic volumes shows that a lot or area is unlikely to fill.

**Vehicle Re-Entry.** Commenters expressed that the plan should provide greater clarity on whether or not vehicles would be allowed to “re-enter” after their initial entry period if they depart the corridor or system.

**Reservation Verification and Queueing.** Commenters expressed concerns about queueing at entrance stations resulting from passes or reservations needing to be checked or from visitors needing to be turned around due to lack of having an appropriate entry pass. Relatedly, commenters expressed concerns about these queues delaying tour or transit (Island Explorer) services. Some expressed the need for some kind of bypass lane for buses and for more entrance stations than currently exist.

**Reservation System Enforcement.** Some commenters expressed concern about how the reservations will be enforced. This includes issues of visitors overstaying their reservation window (in a fixed duration of stay alternative), visitors who are parked in the lot before the reservation time starts for the day and visitors who show up without a reservation.

**Annual Pass Holders.** Commenters requested that the park clarify how the park annual pass is related to the reservation system.

**Financial Feasibility.** Commenters expressed concern over the operational and financial burden of implementing a reservation system. These commenters expressed that the operational and financial constraints make these proposals unrealistic to implement as a long-term and sustainable solution for the park.

## **Timing**

**Seasonal Timing.** Commenters expressed that the season where reservations would be required (under any alternative configuration) should be shortened to just the busiest seasons of the year. All commenters on this topic agreed that the season should include July and August, most agreed that June should also be included. Commenters expressed a range of potential seasonal start and end dates that ranged from early as mid-May to as late as Columbus Day. Some commenters expressed that the reservations season could start or end earlier than the major holidays (Memorial Day, Labor Day, Columbus Day), but that reservations could still be used as a tool for those weekends specifically.

**Daily Timing.** Commenters were mostly in support of the time of day for reservations on Cadillac be retained (for before sunrise to after sunset). However, commenters expressed that other areas (Ocean Drive, Jordan Pond House, etc.) should have later starts and early end times than the system for Cadillac Summit. Commenters suggested that reservations could start as early as 8:00 a.m. or as late as 11:00 a.m. and should end as early as 5:00 p.m. or as late as 6:00 p.m. or 8:00 p.m. Other commenters suggested that the reservations should only be needed on weekends.

**Reservation Entry Window.** Commenters suggested that the National Park Service consider having a 3- to 4-hour window for the timed entry to increase visitor flexibility. Others suggested that smaller time slots for entry (as small as 45-minute increments) would better spread out the arrivals to an area or lot.

## **Locations**

**Cadillac Summit Road.** Commenters noted that the plan doesn't make it clear as to whether or not the proposed Cadillac Mountain Road reservations will apply to parking only or all access.

**Jordan Pond Parking Lots.** Commenters requested that both lots at the Jordan Pond House should be subject to the reservation system, or reservations at Jordan Pond House should be linked to restaurant reservations.

**Extent of Ocean Drive Corridor.** Commenters noted that by making Otter Cliff Road exit only, it really makes the reservation system longer than it appears on the maps. Functionally, this makes the managed corridor extend all the way to Wildwood Stables. This alternative should allow some entry at/near Fabbri to provide access to the section of Park Loop Road between Otter Cliffs and Wildwoods Stable.

**Support for Expanding the Reservation System.** Some commenters suggested that more areas should be managed under alternatives B and C, including the Bubbles Lot and Echo Lake.

## **Allocation**

**Support and Objection to Local Accommodation.** Many commenters submitted comments both in favor, and opposed to the National Park Service providing special exemptions to the reservation system for local users. Many commenters believed that a reservation system should have some accommodation for locals. They identified the implementation of a “local pass” or annual “Acadia pass” that would allow access without reservations; or offer a local pass that could be obtained for immediate access. Some commenters expressed that the reservation system should not apply to locals at all. Others believed that if a reservation system is applied to locals that allowances could be made for them such as: discounted passes, unlimited pass-through (drive-through) access with a special pass available only to locals, specific number of spaces or lots designated for local users only, unlimited hours for locals during off-peak hours, access to roads closed to other visitors. Some commenters suggested ways these passes could be targeted to locals or frequent visitors, including selling them in the off-season or requiring documentation showing proof of residency.

Some commenters stated that no priority should be given to local residents. These commenters expressed that this is a national park and that no class of individuals or residency status should allow preference for access. These commenters also expressed that while change may be difficult, a reservation system is likely the best option to address the pressing need to reduce vehicular impact on the park.

It is important to note that across the range of comments “local” was defined as: people living near the park boundary, people who pay taxes or are residents in the four Mount Desert Island towns, Bar Harbor residents, people who have residency on Mount Desert Island, people who own property on Mount Desert Island, state of Maine residents, residents of Hancock County, residents of states with a national park in them.

**Limits to “Non-local” Vehicles.** Commenters suggested that the National Park Service should limit the amount of nonresident vehicles and people allowed onto Mount Desert Island. Commenters also suggested that the National Park Service construct an

additional access point and bridge onto Mount Desert Island to help alleviate regional traffic issues and provide an additional route if an evacuation were to be necessary.

**Reservation Set Asides.** Commenters expressed that specific allocations for access be set aside for a variety of user groups or uses. These include: volunteers working in the park, locals, American Indian communities, seniors, visitors needing to use blue parking spaces, visitors who have a national park in their home state, American citizens, commercial use authorization holders, emergency vehicles, and frequent visitors.

## **Flexibility**

**Weather Concerns.** Commenters expressed concerns that if they have a reservation on a day that the weather turns out to be less than ideal (i.e., rainy or cloudy days) that there would be a limited possibility to change to another day during their trip. Commenters were also concerned that they could not adjust their planned destinations based on last minute changes in desired activities. Also, commercial operators who rely on clients to use their personal vehicles (for convenience and safety reasons) would have to plan their intended destination earlier than is their current practice and without knowledge of the weather for that specific day.

**Limits to Spontaneous Visitation.** Commenters expressed that reservation systems limit the ability for visitors to participate in spontaneous travel or trip planning decisions and will complicate the trip planning process. The ability to participate in spontaneous travel was especially important for those visitors who live in proximity to the park.

**Proximity to Island Explorer Stops.** Commenters noted that visitors who live or are staying further from Island Explorer stops will have difficulty adapting their trips away from private vehicles and onto Island Explorer shuttles in the absence of being able to acquire a private vehicle reservation.

**Predicting Turnover Rates.** Commenters expressed concern that with a flexible system that allows for spontaneous departure, there is limited ability to predict how long a vehicle will stay, and this will limit the ability of the National Park Service to guarantee that visitors will have a parking spot when they show up with their reservation.

## **Fees**

**Refunds.** Commenters requested additional details on whether reservations would be refundable if cancelled.

**Cost of Reservations.** Commenters expressed some concern that having to purchase a reservation system on top of purchasing a park entrance fee could cause displacement for some visitors or dramatically increase the cost for those visitors who still choose to come. Additionally, there was concern that the cost of reservations for those who visit the park frequently (visitors living in proximity to the park and others) would add up to a substantial cost over the year (when compared to the ability to purchase an unlimited



entry park pass currently). Some commenters expressed having discounts on reservations available for frequent visitors or exempting some visitors from the fees (locals, visitors with small children, senior pass holders, Acadia pass holders, etc.). Commenters recommended that fees be kept as low as possible to administer the system to ensure fair access to the broadest range of visitors. Some commenters expressed that while they were in support of getting a reservation, they thought the reservations should be free since visitors already pay a park entry fee and additional fees would be overly burdensome.

**Congestion Pricing.** Commenters suggested that the National Park Service should consider congestion pricing (or another variable entrance pass pricing) to manage use levels instead of a reservation system. Others expressed concern that congestion pricing would create a pricing structure that unfairly allocates use to those who are most able to afford the higher cost of entry. These commenters recommended that the system would be most fair if the prices for access were the same for all times of day and days of the summer season.

## **IMPACT ANALYSIS**

### **Cultural Resources**

**Segmenting the Park Loop Road.** Commenters noted that segmenting the Park Loop Road with reservation-only areas is in contradiction to the historic design of the road and its traditional use.

**Visual Impacts.** A commenter requested the National Park Service should describe the visual impacts of the booths and new parking required for the reservation areas. Similarly there was concern on how Cadillac Mountain would be altered and the detrimental impact to the park in general by building additional infrastructure.

### **Natural Resources**

**Air Quality Impacts.** A commenter noted that the National Park Service should consider the impacts to air quality associated with the transportation plan. Specifically the National Park Service should ensure that increased use of the Island Explorer and other public transit not cause air quality damage.

**Natural Resource Impacts.** A commenter requested that the plan should further analyze impacts to natural resources and consider actions associated with transportation infrastructure that could improve natural resource condition (particularly associated with wildlife crossings).

**Climate Change and Sea Level Rise.** A commenter requested that the plan address specific actions associated with transportation infrastructure and other park facilities that are vulnerable to damage associated with rising sea levels and increasing storms.

The commenter noted that the National Park Service should accept that some features are not sustainable in the face of climate change.

## **Visitor Access**

**Impacts to Trail-Head Access.** A couple of commenters noted that some of the proposed actions would further reduce the already-reduced parking access to hiking trails, particularly at Cadillac North Ridge, North Gorge, Stratheden, Hemlock, and Jesup Path.

**Traffic Simulations.** Some commenters requested that traffic simulation modeling be used to help the park make decisions and/or share information about how the proposed changes will affect use in the park and in the surrounding areas.

**Limitations to First-Come, First-Served Access.** Commenters requested that the impact analysis should acknowledge that reservation systems limit first-come, first-served access, which is a reduction in access from the current condition and therefore an adverse impact.

**Supply and Demand Profiles.** A commenter requested that the analysis in the plan should include not only supply and demand profiles by season but also by time of day.

## **Visitor Experience**

**Shifting Visitation Patterns.** Commenters asked the National Park Service to consider the fact that less frequented sites that are not on the Park Loop Road will be pressured by any restrictions on popular sites. Also, the proposed restrictions will divert visitors to less-used parts of the park, Island Explorer hubs, Mount Desert Island, and/or the surrounding areas and will encourage visitation during times/seasons that are less busy. Some commenters expressed that the park should encourage people to visit less-crowded areas and during less-busy times, while other commenters were in opposition to this idea.

**Effectiveness of the Reservation System.** Commenters suggested that implementing parking reservations won't reduce congestion or the amount of illegal parking that occurs in the park, and may even increase it.

**Visitor Experience Qualities.** Commenters suggested that a reservation system will be detrimental to the quality of visitor experience. It will cause stress (as visitors attempt to reach their destination so that they don't lose their reservation or as they may have to worry about being penalized for overstaying their reservation), it will reduce the time and flexibility a visitor has when exploring the park, and it may mean that some visitors can't see the park at all if all spots are sold out ahead of the season. Many other commenters noted that the current levels of traffic in the park is degrading the quality of visitor experience. Noting that the bus noise, stress of finding a place to park, and damage to resources can all contribute to unpleasant visits.

**Purchasing Multiple Reservations.** Commenters noted that the need to purchase multiple reservations to visit different sites in the park will be confusing and expensive.

**Noise.** Commenters requested the National Park Service develop strategies to limit excessive noise. Specifically asking that unmuffled engines and other loud vehicles should be prohibited.

## **Safety**

**Changes to Safety Analysis Relative to Cyclists.** Commenters suggested that the analysis of safety impacts from increased use of the Park Loop Road by cyclists and pedestrians is inaccurate. Chapter 4 of the plan identifies that managed access to the entire Park Loop Road, particularly in alternative D, may cause more use by pedestrians and cyclists. The plan goes on to note that could cause increased conflict with vehicles. Commenters suggested this increased nonvehicular use may actually lower vehicle speeds, increase driver awareness, and actually increase safety for cyclists and pedestrians. Commenters also suggested that the plan's safety analysis should include that managing access to specific corridors will reduce vehicle volumes and therefore make the Park Loop Road safer for cyclists and pedestrians.

## **Socioeconomics**

**On Demand Rideshare Services.** Commenters expressed concern with the roundtrip cost of on-demand rideshare services to access the park being too high for people to actually use this option.

**Concerns over Increasing Congestion in Towns.** Commenters expressed concern that moving parking outside the park will cause congestion and crowding in the towns and villages on Mount Desert Island. There was also concern about increased wear and tear on town roads, specifically on Schooner Head Road and Miller Garden Road.

**Effect on local businesses.** Commenters raised multiple concerns regarding the effects of the proposed changes on local businesses. Particularly there was concern that local artists such as photographers and painters would no longer be able to use the park when the right conditions (lighting, weather conditions) were right to make their art. There was also concern on the effect a reservation system may have on vacation rentals if a reservation is implemented and guests are not able to access the park. Other commenters noted that there are other things to do in Bar Harbor and Mount Desert Island and therefore having visitors wait for their reservation time may increase business to local shops. Finally, it was noted that alternative D could have a negative impact on the relationship the park has with surrounding communities who depend on park visitation for their economies.

**Demographic analysis.** A commenter questioned whether the park had collected demographic information to help understand the increase in visitation. The commenter

questioned whether the visitation increase would be short lived if it's driven by retired baby boomers.

**Cruises.** Commenters expressed support for alternative C as it does not seek to reduce the number of visitors to the park. It was noted that maintaining access to the park for cruise passengers without restrictive measures that make visiting the park too difficult or costly was important to continue supporting the economic benefits from cruise ship visits. Other commenters noted that the number of cruise ships and passengers have increased and the need to manage them. Some commenters proposed limiting the number of cruise ships and if necessary institute a lottery for a limited number of spots cruise companies could use.

**Marketing.** A commenter noted concern with the heavy marketing of the park and suggestions to have it stopped to get visitation levels under control.

### **Indicators, Thresholds and Visitor Capacity**

**Visitor Capacity.** Commenters noted that the number of visitor reservations per day should be based on the number of people that could sustainably access the park.

**Modifications to Thresholds.** Some commenters thought the National Park Service should consider establishing additional triggers for indicators to ensure that values and resources are protected before thresholds are reached.

**Rationale for Thresholds.** Some commenters thought the National Park Service should clarify the rationale used to establish thresholds.

**Suggestions for Additional Monitoring.** Commenters suggested the National Park Service should include monitoring Island Explorer stops outside the park, including the Village Green, into its adaptive management plan.

**Commitment to Monitoring.** Commenters suggested the adaptive management approach proposed by the park should be accompanied in the plan by a statement of the park's commitment to carry out monitoring of the effects of its actions, as well as to maintaining the necessary funding to implement it.

**Clarification of Terms.** Commenters thought the National Park Service should define what qualifies as a “low use trail” in the context of this analysis and future monitoring program.