National Park Service

U.S. Department of the Interior

Denali National Park and Preserve

Alaska

Record of Decision

Denali Park Road Vehicle Management Plan and Environmental Impact Statement

September 2012

Recommended: Paul R. Anderson 9/27/2012

Superintendent, Denali National Park and Preserve — Date

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Regional Director, Alaska — Date

NATIONAL PARK SERVICE

RECORD OF DECISION

FINAL ENVIRONMENTAL IMPACT STATEMENT

DENALI PARK ROAD VEHICLE MANAGEMENT PLAN

Denali National Park and Preserve
Alaska

INTRODUCTION

This Record of Decision (ROD) documents the decision by the National Park Service (NPS) to adopt a Vehicle Management Plan for Denali National Park and Preserve. The Vehicle Management Plan addresses management of all motorized vehicles on the restricted section of the Denali Park Road (Mile 15 – Mile 90). This plan amends the vehicle management aspect of the park's General Management Plan (GMP).

This ROD has been prepared by the NPS, pursuant to the National Environmental Policy Act of 1969 and 40 CFR 1505.2. This document details the background of the project, the decision made (selected alternative), other alternatives considered, the basis for the decision, the environmentally preferable alternative, measures adopted to minimize environmental harm, and public involvement in the decision making process.

BACKGROUND OF THE PROJECT

Vehicle management on the Denali Park Road, the primary means of access into Denali National Park and Preserve, has been based on a GMP from 1986 and the Entrance Area and Road Corridor Development Plan (a GMP amendment) completed in 1997.

The purpose of this Vehicle Management Plan is to provide specific direction for improved vehicle management on the restricted section of the Denali Park Road for the next 20 years. The plan describes how the NPS will manage vehicle use on the Park Road in order to provide future generations with an opportunity for a high quality experience while protecting wilderness resources and values, scenic values, wildlife, and other park resources; and maintaining the unique character of the Park Road.

DECISION (SELECTED ACTION)

The NPS has selected Alternative D (NPS Preferred Alternative) which offers visitors the opportunity to have a high-quality experience using a transportation system that offers predictability, efficiency, and variety.

Description of the Selected Action

With the implementation of this alternative the number of vehicles, their schedules, and behavior will be managed to meet visitor demand while maintaining standards for desired resource conditions and visitor experience. Several times each season, key indicators will be monitored to assess the success of current traffic levels, behavior and patterns to determine whether the set standards are being met.

Comprehensive monitoring will also be conducted at regular intervals to specifically address the impacts of traffic on wildlife, wilderness, and the visitor experience. A Before-After Control Impact (BACI) study will be conducted within the first five years of the plan's implementation to affirm the selection of key indicators and to distinguish impacts due to changes in current traffic patterns and traffic levels. Data from long-term inventory and monitoring programs may also be used to evaluate whether changes in the resource condition are occurring.

In addition to managing for desired conditions, the maximum level of vehicle use on the restricted section of the Park Road will be 160 vehicles per 24-hour period. This limit includes all motor vehicles counted westbound at the Savage River Check Station. The 160-vehicle limit is derived from traffic model simulation results and extensive scientific research on visitor preferences and resource condition.

The NPS will propose a modification to the current park-specific regulations to set the maximum level of daily vehicle use at 160 vehicles per 24-hour period during the GMP-defined visitor season. To meet standards, the number of vehicles allowed could be less than this maximum.

A majority of seats on both transit and tour buses will be available for prebooking by visitors (independent and organized groups) to fully optimize the performance and efficiency of the transportation system. This will allow managers to predict daily vehicle needs and maximize the flexibility of the system to accommodate visitor demand.

To further preserve wilderness resource values and the visitor experience, a new management subzone on the Park Road will be created west of Eielson Visitor Center to Wonder Lake (Wildlife Viewing Subzone 3). This section will be managed for the lowest traffic volume on the Park Road and will not allow for significant growth beyond the current condition.

Continuation of Current Management Practices

- The *2005 Denali National Park Road Maintenance, Repair and Operating Standards* and *2007 Denali National Park and Preserve Road Design Standards* will continue to apply.
- The NPS will explore the use of alternative energy vehicles and other fuel-saving technologies/practices and/or policies. Such measures could be addressed in the prospectus that will be issued for the new concession contract.

- To reduce the threat of invasive plants, the park's current requirement to regularly wash buses, park vehicles, and construction equipment will continue.
- Use of calcium chloride to control dust on the gravel section of the Park Road will continue unless its use is determined to be harmful to the environment.
- The park will continue to pursue new ways to address dust issues associated with vehicle traffic along the unpaved section of the road (e.g., use of water trucks, controlling traffic volume, and new dust palliative products).
- All visitors, whether they are on a transit or tour bus, will have the opportunity to get off the bus and return east on the transit system.
- There will be no facility capital improvements along the restricted section of the Park Road associated with plan implementation; therefore, no additional costs associated with facility development or operations are anticipated.

Managing for Desired Conditions

Vehicle use on the Park Road will be managed to achieve specific desired conditions. Through the use of indicators and standards, the current visitor experience and resource condition will be maintained or improved. For the restricted section of the Park Road (Savage River to the Old Park Boundary north of Wonder Lake), the following indicators will be used:

- sheep gap spacing
- nighttime traffic levels
- large vehicle traffic
- vehicles at a wildlife stop
- vehicles in a viewscape
- wait time for hikers
- vehicles at rest areas and Eielson Visitor Center

Additionally, comprehensive monitoring and data collection will take place for the following to detect any impacts attributable to changes made to the transportation system:

- natural resource condition
- visitor satisfaction

All vehicles traveling on the restricted section of the Park Road will be required to follow the newly adopted behavior practices for vehicle movement to meet desired conditions.

All bus drivers, including inholder bus drivers, will have the same minimum level of training in order to drive on the Park Road.

Bus Size

The NPS may conduct a study to explore the feasibility and affects of buses larger than the current design that would meet the standards for desired conditions for use in Wildlife Viewing Subzone 1 (Savage River to Teklanika). No structural upgrade to the road will be considered to accommodate these larger vehicles.

Transportation System

Within the transportation system, destinations for tour and transit service may change as long as resource protection and visitor experience standards are met. As changes are made to the transportation system, visitors' perceived value of the transportation system will be assessed over time to guide decision making.

To improve the visitor experience, the NPS will address the potential for using the best technologies for quieter, more comfortable buses through the concession prospectus process.

<u>TransitSystem</u>

The transit service will provide access along the entire length of the Park Road and offer visitors the opportunity to get off and reboard at any point along the way. Transit buses will be operated to meet the needs of hikers, campers, and visitors who may choose to remain on board. The majority of seats will be available for prebooking, and ticket pricing will be determined by destination. Some open seats will be retained in the reservation system to allow for spontaneous trip planning. Departing buses will have some open seating to facilitate visitor pickup along the Park Road.

Transit buses will run on regular intervals from the Wilderness Access Center and be scheduled to meet visitor demand. Transit buses will be equipped with external bike racks to better accommodate cyclists and to optimize seating. In addition, transit buses will be configured to accommodate recreation and camping equipment, which may be carried externally. The Denali Visitor Center will be a regular stop on the eastbound transit schedule during operating hours to give visitors the option of disembarking.

Transit drivers will provide key park messages, relevant information, and answers to visitor questions. Self-guided tour materials will be available for purchase to supplement the visitor experience, but a discrete self-guided tour will not be offered. Visitors will be able to use transit for accessing off-bus activities such as Discovery Hikes.

Flexibility and freedom to move throughout the park will be addressed through changes in the transit system schedule and monitoring the indicator for hiker wait

time. When allocating vehicle use within the transportation system, the transit service will have priority.

The range of transportation system options available to visitors will be clearly communicated through a variety of means (e.g., electronically, printed materials, and personal communication) by the Park Service and its partners.

PremiumTours

Premium tours will provide visitors with guided interpretation and education, providing enhanced opportunities to understand and appreciate the park's natural and cultural resources. Off-bus activities with professional interpretive programs, guided talks at key locations, and the use of media and technology may be included on premium tours. Premium tours will be offered along the length of the Park Road, with a higher volume of these tours occurring between the Savage and Teklanika rivers. Premium tours will have at least one opportunity to visit an NPS interpretive facility or interact with an NPS interpreter. Premium tours may include food and beverages.

Premium Short Tour: Up to half a day in duration, these tours could be offered to designated locations throughout Wildlife Viewing Subzone 1 (Savage River to Teklanika). Thematic narration and appropriate activities for the short tour may include on- and off-bus activities (i.e., wildlife, park history, wilderness, walks, and educational programs).

Premium Long Tour: These tours will be offered to destinations along the full length of the Park Road, but predominantly operate within Wildlife Viewing Subzone 2 (Teklanika to Eielson Visitor Center). Long tours will be developed for visitors who want a guided experience and have a full day to enjoy the park. Thematic narration, destination, and appropriate activities for tours will be driven by visitor demand. Visitors could expect that long tours will provide more opportunities than the short tour to view wildlife and scenery due to time and distance traveled. Premium long tours will start at the Wilderness Access Center or with a pickup at a local hotel.

In addition to guided premium tours, specialized tours and educational programs on a variety of topics will be provided by the concession contract, through regular park operations, and with park partners at the Murie Science and Learning Center. Educational programs provided directly by the NPS and Murie Science and Learning Center will have preference over commercial tours.

Opportunities for off-bus guided tour activities will be primarily restricted to the developed areas along the Park Road and will comply with the 2006 *Backcountry Management Plan*. All tours will have at least one opportunity to visit an NPS interpretive facility or interact with an NPS interpreter.

Interpretation

Key park themes and messages will be provided to facilitate visitor understanding and appreciation for the park's natural and cultural resources. This will require all drivers and naturalists to meet minimum standards for interpretation, with Premium Tour bus drivers meeting higher standards for interpretation.

Other Vehicle Use

To maximize the number of visitors who can be accommodated by the transportation system, other vehicle use may be reduced to benefit the transportation system. The following management strategies represent the most restrictive actions that would be taken over the life of the plan.

National Park Service

Contractor and NPS operations will be managed (i.e. after hours travel) to minimize impacts on the visitor experience and to minimize resource impacts.

During periods of low traffic volume, NPS employees may use private vehicles to access duty stations on the restricted portions of the Park Road (Savage River to Wonder Lake). During periods of high traffic volume, employees will use an employee transportation system (i.e., carpool or employee shuttle). Guests of employees could travel with employees or use the transportation system for access.

Professional Photography and Commercial Filming

The professional photography and commercial filming programs will be combined to provide equity in permit distribution and gain efficiencies in administration and oversight. Up to five permits per day will be available for the entire road, as long as photographer vehicles do not displace buses or administrative traffic. Permits will be reduced as necessary to avoid displacement of visitor opportunities and administrative functions.

Permits will include stipulations necessary to ensure standards for desired conditions are met (e.g., no more than one photographer vehicle at a wildlife stop, no parking in sheep crossing zones, and consideration of vehicles in the viewshed on the Park Road).

Kantishna Inholder Access

ANILCA title XI, section 1110(b) provides that inholders shall be afforded adequate and feasible access to their property for economic and other purposes, subject to reasonable regulations. These regulations could include vehicle numbers, timing of

road use, vehicle behavior, and use of park facilities. The GMP allocation of 1,360 permits will remain in effect to provide inholders use of the restricted section of the Park Road for transporting overnight guests and for 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.

Commercial Day Tours to Kantishna Inholdings

Commercial day tours to Kantishna inholdings will be allowed under appropriate authorizations. Such day tours are considered a commercial activity in the park outside the boundary of an inholding and not provided for by ANILCA section 1110(b). Visitor services, including commercial vehicle day tours on the Park Road, will be authorized consistent with this Vehicle Management Plans.

Commercial day tours to Kantishna Lodges will have the same priority as concession operated tours on the Park Road.

Teklanika River Campground

If needed to meet standards, private vehicles driving to and from Teklanika River Campground will travel on the Park Road during periods of low traffic volume.

Management Zoning

Changes to the Park Road subzones will be implemented to achieve desired conditions within specific road sections. These changes are made in part to reaffirm the *2007 Road Design Standards* and further support the preservation of character-defining qualities and attributes contributing to the road's eligibility for the National Register of Historic Places. The proposed changes include the following:

1. Creation of Wildlife Viewing Subzone 3 (from the Eielson Visitor Center to the Wonder Lake junction).

   This subzone involves a gravel section of the Park Road that is maintained to a narrower width on which vehicle restrictions (Rules of the Road) continue to apply. Visitors must use one of the bus systems. The use of private vehicles is restricted. Buses are given the right-of-way. The primary purpose of this road segment is for a more wild and remote type of visitor experience along the road.

   Travel to this section of the road requires a significant time commitment by visitors. Those who make the trip will experience a more quiet and contemplative setting and fewer encounters with other vehicles along this section of road than in Wildlife Viewing Subzone 2. Park facilities are highly limited in this zone to minimize any additional

footprint on the landscape. No visitor contact stations will be provided along this section of road.

2. Reducing Wildlife Viewing Subzone 2.

   This zone will extend from the Teklanika River Bridge to the Eielson Visitor Center and from the Wonder Lake junction to the Old Park Boundary.

3. Wildlife Viewing Subzone 1 will remain the same.

Implementation

The actions approved in this ROD will be implemented over the life of the plan. Specifically, the standards will be addressed in the operating plan for the new concessions contract. Monitoring will continue with a frequency determined from data gathered in the 2013 and 2014 season. Commercial day tours to Kantishna inholdings will be managed under the appropriate authorization by 2013. The professional photography and commercial filming program will be consolidated by the 2014 season.

MITIGATING MEASURES

Monitoring will inform park managers when mitigative measures are needed. Monitoring will be accomplished through measuring impact indicators linked to natural resources and the visitor experience.

Indicator	Standard		
	Wildlife Viewing Subzone 1	**Wildlife Viewing Subzone 2**	**Wildlife Viewing Subzone 3**
Number of vehicles at a wildlife stop **Number of vehicles at a wildlife stop** **(continued)**	At least 75% of wildlife stops will have three or fewer vehicles, averaged over five years. No one year will have less than 70% of wildlife stops with three or fewer vehicles.	At least 75% of wildlife stops will have two or fewer vehicles, averaged over five years. No one year will have less than 70% of wildlife stops with two or fewer vehicles.	At least 75% of wildlife stops will have one or fewer vehicles, averaged over five years. No one year will have less than 70% of wildlife stops with one or fewer vehicles.
	At least 90% of wildlife stops will have four or fewer vehicles, averaged over five years. No one year will have less than 85% of wildlife stops with four or fewer vehicles.	At least 90% of wildlife stops will have three or fewer vehicles, averaged over five years. No one year will have less than 85% of wildlife stops with three or fewer vehicles.	At least 90% of wildlife stops will have two or fewer vehicles, averaged over five years. No one year will have less than 85% of wildlife stops with two or fewer vehicles.
	At least 95% of wildlife stops will have five or fewer vehicles, averaged over five years. No one year will have less than 90% of wildlife stops with five or fewer vehicles.	At least 95% of wildlife stops will have four or fewer vehicles, averaged over five years. No one year will have less than 90% of wildlife stops with four or fewer vehicles.	At least 95% of wildlife stops will have three or fewer vehicles, averaged over five years. No one year will have less than 90% of wildlife stops with three or fewer vehicles.
Number of vehicles in a viewscape	At least 85% of the time during bus operating hours, there will be three or fewer vehicles visible in the mile 26 viewshed, averaged over five years. No one year will have less than 80% of the time during bus operating hours having three or fewer vehicles visible in the mile 26 viewshed.	At least 85% of the time during bus operating hours, there will be two or fewer vehicles visible in the miles 55 and 62 viewsheds, averaged over five years. No one year will have less than 80% of the time during bus operating hours having two or fewer vehicles visible in the miles 55 and 62 viewsheds.	At least 85% of the time during bus operating hours, there will be one or fewer vehicles visible in the mile 68 viewshed, averaged over five years. No one year will have less than 80% of the time during bus operating hours having one or fewer vehicles visible in the mile 68 viewshed.
	At least 95% of the time during bus operating hours, there will be four or fewer vehicles visible in the mile 26 viewshed.	At least 95% of the time during bus operating hours, there will be three or fewer vehicles visible in the miles 55 and 62 viewsheds.	At least 95% of the time during bus operating hours, there will be two or fewer vehicles visible in the mile 68 viewshed.
Number of vehicles in a viewscape	No one year will have less than 90% of the time during bus operating hours having four or fewer vehicles visible in the mile 26	No one year will have less than 90% of the time during bus operating hours having three or fewer vehicles visible in the miles 55 and	No one year will have less than 90% of the time during bus operating hours having two or fewer vehicles visible in the mile 68 viewshed.

A management toolbox (i.e., strategies for managing vehicle use to meet standards for desired conditions) will be used to manage vehicle use. From the least restrictive to most restrictive actions these strategies will include, but are not limited to:

- adjust vehicle behavior (e.g., through education and contract and permit compliance)
- adjust vehicle timing (e.g., change the schedule to allow for greater vehicle spacing)
- adjust other vehicle use to favor the transportation system (e.g., Teklanika campers travel during low traffic volume and moving administrative traffic to nighttime hours)
- reduce other vehicle use to favor the transportation system (e.g., NPS employees use transit system)
- reduce vehicles in the transportation system

PUBLIC AND AGENCY INVOLVEMENT

This ROD represents the culmination of over four years of concerted planning, analysis, and input provided by the NPS planning team, park staff, Alaska Native groups, other government agencies, and the public. The process of consultation and coordination was vitally important throughout this planning project.

The notice of intent to prepare an environmental impact statement was published in the *Federal Register* on Tuesday, August 12, 2008 (Vol. 73, No. 156).

Public Scoping

During the summer of 2008, the National Park Service issued a public newsletter announcing the vehicle management plan / environmental impact statement. The newsletter identified the Park Service's intent to evaluate a range of alternatives for managing vehicles on the Park Road, and presented background information to support the decision to undertake the plan. The newsletter invited public comments, concerns, and suggestions to assist the planning team with specific regard to the following topics:

Alternative approaches and ideas for accomplishing project goals.

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

Other potential projects that might affect or be affected by the project.

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

Information on how visitors and others use the park, and how the project might affect that use.

Concerns about conditions or activities in the park related to the planning project, and suggestions for improvement.

The National Park Service also held four public open-house scoping meetings for this plan during September 2008. Meetings were held in Anchorage (September 3, 2008); Susitna Valley (September 4, 2008); Denali Park (September 10, 2008); and Fairbanks (September 11, 2008). The National Park Service provided a brief presentation of the planning project at each meeting. Approximately 58 people attended the meetings.

Planning Workbook and Workshops

The *Denali Park Road Planning Workbook* provided background information and preliminary concepts for the plan / environmental impact statement. Public review of the workbook occurred between January 1, 2010 and March 1, 2010. A series of public workshops was held in February 2010 to discuss the preliminary concepts, and to provide information on how the alternatives would be developed. Members of the public were invited to discuss the workbook and share their suggestions with park staff. The workshops were held in the park (February 11, 2010); Fairbanks (February 17, 2010); and Anchorage (February 18, 2010). Approximately 80 people attended these meetings.

Draft and Final Environmental Impact Statements/Public Comment

The Notice of Availability for the draft plan / environmental impact statement was published in the Federal Register on August 1, 2011 (Vol. 76, No. 147). A series of public meetings were held in Denali Park (August 23, 2011); Fairbanks (August 31, 2011); and Anchorage (September 7, 2011). Approximately 61 people attended the meetings. Additionally, park staff were invited by stakeholder groups to discuss the draft plan at their regular meetings. Park staff attended and presented at approximately six stakeholder meetings.

The initial 60-day public comment period, August 1 through September 30, 2011, was extended to October 31, 2011 in response to numerous requests from the public and organizations. A total of 324 pieces of correspondence were received, containing 889 comments, during the 90-day comment period.

A preferred alternative was not identified in the draft plan to allow for refinement of the existing alternatives based on public input. The preferred alternative in the final plan addresses many of the comments and concerns that were received on the draft plan.

The Notice of Availability for the final plan/environmental impact statement was published in the Federal Register on June 29, 2012 (Vol. 77, Issue 127)

Agency and Tribal Consultation

Park staff meet on occasion with representatives of federal and state agencies and regional and local governments (as appropriate) on topics of mutual interest and concern, such as operating the park, preserving park resources, and making the park safe and enjoyable for visitors. The NPS informed these groups of the draft plan / environmental impact statement and indicated that discussion topics and planning issues were welcomed.

Park staff communicated with local tribal groups regarding the plan. The planning alternatives were developed with consideration that project actions would avoid or minimally disturb resources or values important to affiliated Alaska Native tribes. The planning alternatives do not entail new construction or ground disturbance, and are not anticipated to impede access to places of traditional religious, ceremonial, or other customary activities.

OTHER ALTERNATIVES CONSIDERED

Alternative A (No Action)

Alternative A represents the existing conditions. Currently, vehicle use on the restricted section of the Park Road is managed to maintain a 10,512 seasonal limit that was set in the 1986 general management plan and then published as a regulation in 2000 (36 CFR 13.932). The regulated season begins on the Saturday of Memorial Day weekend and continues through the second Thursday following Labor Day, or September 15, whichever comes first. Allocation for segments of the transportation system and other vehicle use were modified in the 1997 *Entrance Area and Road Corridor Development Concept Plan* and the *Superintendent's Compendium*.

Alternative B (Maximizing Visitor Access)

This alternative would promote maximizing seating on all transit and tour vehicles to offer the largest number of visitors the opportunity to travel the Park Road. Visitors would have access to a highly structured transportation system that offers predictability, efficiency, and greater opportunity to have a park experience of choice, while meeting set standards for natural resource protection and visitor experience.

To fully optimize the transportation system, a majority of seats on both transit and tour buses would be available for prebooking by visitors (independent and organized groups). This would allow managers to predict daily vehicle needs and maximize the flexibility of the system to accommodate visitor demand.

Alternative C (Maximizing Visitor Opportunities)

This alternative would promote a variety of visitor opportunities that range from brief experiences in the park's entrance area, to short and long visits along segments of the Park Road, to multiday experiences in the park's backcountry. Visitors would have opportunities for

spontaneity and freedom during their park visit, while set standards for resource condition and visitor experience are met.

The transportation system in this alternative would separate tour and transit functions by developing a self-guided economy tour. Distinguishing the economy tour experience from transit offers benefits to both user groups. Dedicated transit services would provide more seating for eastbound hikers, increasing visitors' freedom of movement. A dedicated economy tour service would provide visitors with a modest tour experience.

BASIS FOR THE DECISION

The basis for the decision stems from management objectives that were developed to comply with applicable Federal laws, regulations, and policies and respond to the issues identified through internal and public scoping. Alternative D best meets the purpose and need of the project according to the objectives identified in the FEIS.

With implementation of Alternative D, the National Park Service will use measurable indicators and standards and comprehensive monitoring to ensure key park resources and values along the Park Road are adequately protected in accordance with desired conditions. The regular monitoring of key indicators will allow a flexible and timely response to impacts on the resource and visitor experience. Comprehensive monitoring will provide for long-term analysis of traffic impacts.

In response to public comment, the alternative includes a maximum level of vehicle use once standards for desired conditions have been met. A daily vehicle capacity ensures that traffic patterns will be regularly maintained.

The traffic scenario used to analyze Alternative D modeled 147 daytime vehicles (6am-10pm). Thirteen nighttime (10pm-6am) vehicles were added to comprise the 160 vehicle limit within 24 hours. This traffic scenario is anticipated to meet set standards for desired conditions. If monitoring shows that standards are not being met, the daily vehicle limit will be lowered and managed at a level that meets standard.

The premium tour service will consist of options for short and long tours and include specialized educational tours offered by the Murie Science and Learning Center. This will provide a range of tour opportunities for visitors.

The creation of Wildlife Viewing Subzone 3 will preserve existing road character and offer a quiet, more contemplative park experience in comparison to other zones along the Park Road.

The professional photography and commercial filming programs will be combined to offer greater equity in permit distribution and administrative efficiency. The number of permits available for the combined program will be up to five per day and dependent on known traffic

volume. This will reduce the impact on the visitor experience during the peak visitor season and allow for more permits in the shoulder seasons desired by photographers.

Commercial day tours to Kantishna inholdings will be allowed under appropriate authorizations. Such day tours are considered a commercial activity in the park outside the boundary of an inholding, and are not provided for by ANILCA section 1110(b). Visitor services, including commercial vehicle day tours on the Park Road, will be authorized consistent with this Vehicle Management Plan.

Commercial day tours to Kantishna Lodges will have the same priority as concession operated tours on the Park Road.

Campers will continue to be able to drive their private vehicles to the Teklanika River Campground, but may have to travel during periods of low traffic to reduce impacts on the visitor experience and meet desired conditions.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

Alternatives B, C, and D are similar in terms of impacts on wildlife and other natural resources, consequently, the Park Service has determined that all three action alternatives are environmentally preferable compared to alternative A.

Alternative D best meets the purpose and need of the project according to the objectives identified in the FEIS.

NON-IMPAIRMENT DETERMINATION

Anticipated impacts associated with the implementation of alternative D would not constitute impairment on park resource values. This includes resource values whose conservation is necessary to fulfill the enabling legislation or proclamation of the park, or values identified as significant in the park's general management plan or other relevant NPS planning documents. The non-impairment determination is appended to this ROD as Attachment B.

CONCLUSION

Establishment of a Vehicle Management Plan for the Denali Park Road in Denali National Park and Preserve is a necessary step to address vehicle management and vehicle capacity in light of increasing visitation. The management plan will address and mitigate resource and visitor experience impacts while still providing for a modest increase in vehicle use over the current condition.

All practical means to avoid or minimize environmental harm have been adopted. The action described in this ROD will not impair park resources or values, and will enhance the ability of park users to enjoy the park in a manageable and sustainable manner.

ATTACHMENT A: RESPONSE TO COMMENTS

Twenty-three pieces of correspondence were received on the final plan. Comments were reviewed and classified as substantive or non-substantive. A substantive comment is defined in DO-12 as one that does one or more of the following (DO-12, section 4.6A):

> Question, with a reasonable basis, the accuracy of information presented in the EIS;
> Question, with reasonable basis, the adequacy of the environmental analysis;
> Present reasonable alternatives other than those presented in the EIS; and/or
> Cause changes or revisions in the proposal.

Substantive comments raise, debate, or question a point of fact or policy. Comments in favor of or against the preferred alternative or alternatives, or those that only agree or disagree with NPS policy are not considered substantive. However, the National Park Service may elect to respond to some nonsubstantive comments if they represent common questions or misunderstandings among the public or other stakeholders.

Comments were grouped by similar themes and summarized with an issue summary statement. Following each issue statement are one or more representative quotes, taken from the correspondence to illustrate the issue, concern, or idea expressed by the comments grouped under that issue statement.

VEHICLE CAPACITY

Issue Summary Statement

Commenters expressed concern over the fixed daily vehicle limit in Alternative D. Comments ranged from suggesting an hourly limit or lower daily capacity, to suggesting that any limit on vehicle capacity would decrease flexibility for park managers to adaptively manage. One comment suggested that the current GMP defined visitor season should no longer apply since vehicle use will now be managed on daily basis.

Representative Quotes

“Consider a conservative number of 145 vehicles per day as the maximum daily limit for traffic on the Denali park road. The monitoring will demonstrate whether standards can be met and wildlife viewing opportunities sustained under a higher-traffic regime.”

“We would strongly recommend against adopting formal regulations establishing a fixed 160 vehicle limit or any fixed limit pending further analysis and field testing. One of the criticisms of the current 10,512 number now in regulation is that it restricts the agency's management flexibility and options.”

Response

As shown in Appendix D of the final plan, the traffic scenario used to analyze Alternative D modeled 147 day time vehicles (6am-10pm). Thirteen nighttime (10pm-6am) vehicles were

then added to comprise the 160 vehicle limit within 24 hours. This traffic scenario is anticipated to meet set standards for desired conditions. If monitoring shows that standards are not being met, the daily vehicle limit would be lowered and managed at a level that met standard.

The flexibility needed by park managers to meet visitor interest and demand is provided by the ability to allocate vehicle use (while meeting standards for desired conditions) to favor the transportation system.

The GMP definition of the core visitor season is being retained since it still captures the period of the year when the park receives the highest visitation and vehicle use. This plan deals only with vehicle use during the core visitor season which extends from late May to mid-September.

ACCESS TO KANTISHNA

Issue Summary Statement

Comments on access to Kantishna requested clarification on the distinction between inholder access authorized under ANILCA 1110(b) and managing access for commercial day tours to inholdings, and affirming access for subsistence users. Concern was also raised about what type of access would be counted in the 1,360 allocation of inholder vehicle permits and the priority of this access in relation to the transportation system.

Representative Quotes

"It is unclear how the Service will implement the transit service priority and whether it would prevail over all other uses, including the right of access afforded inholders by ANILCA."

"Concession-authorized day tours operated by inholders should clearly be included within the 1,360 allocation limit for vehicles to Kantishna."

"The EIS should examine potential impacts to Kantishna business and property owners from maintaining current access restrictions."

"The final EIS should have provided an explanation of why concession contracts rather than commercial authorizations would be required under Alternative D."

"We request the plan expressly state that subsistence users will not be restricted."

Response

The NPS will continue to provide adequate and feasible access for Kantishna inholders. This plan does not reduce the vehicle access to Kantishna inholdings authorized under ANILCA 1110(b). However, it does make a distinction between inholder access for personal and overnight commercial use on the inholding authorized under ANILCA 1110(b) and commercial day tour use, which includes commercial activity on park lands beyond the boundaries of the inholding.

The 1,360 allocation, established in the 1997 GMP amendment, meets ANILCA 1110(b) inholder access needs and will be retained. This plan is not anticipated to have a negative economic impact on Kantishna inholders since the current allocation does not impact their ability to sustain

overnight commercial use. In the future, if inholders request additional access authorized under ANILCA 1110(b), their specific requests would be addressed by park management.

The Record of Decision allows for the appropriate mechanism to authorize commercial day tours to Kantishna. Consistent with protecting the existing level of resource and visitor experience conditions, the plan will maintain the current level of day tours and potentially allow for limited business growth.

The National Park Service will continue to provide reasonable access for subsistence activities in the Kantishna area under this plan.

SCIENTIFIC ANALYSIS

Issue Summary Statement

Some members of the public questioned the level of impact of Alternative D and impact analysis done for wildlife in the plan.

Representative Quote

"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."

Response

The plan is anticipated to retain, or improve the current resource and visitor experience condition. Historical and current wildlife data was used in the EIS analysis as referenced in the draft and final plans. Long-term monitoring of wildlife occurs as part of the Central Alaska Inventory and Monitoring Program and is included in the comprehensive monitoring plan of the Vehicle Management Plan.

INDICATORS AND STANDARDS

Issue Summary Statement

Commenters requested that the National Park Service consider additional indicators, such as a departure wait time and wilderness specific indicators.

Representative Quotes

"Monitor and report the departure wait time for visitors trying to access the transit system from the entrance area of the park"

"In all the action alternatives, there is recognition that there will be an increased impact on the wilderness experience. However, this is not addressed in the Before -After Control Impacts (BACI) study plan."

Response

The NPS considered a departure wait time indicator during the development of the draft plan. It was not selected because the hiker wait time indicator is a more effective measure of the ability of the system to meet visitor needs, and the proposed reservation system ensures reasonable and timely access to the transit system.

Indicators for desired wilderness conditions are included in the 2006 Backcountry Management Plan and will be used for the BACI study.

MONITORING

Issue Summary Statement

Comments on the monitoring program included suggestions on technical details and a request for clarification on how the monitoring results will affect the plan's implementation. One comment asked about the continued monitoring of the dust palliative program.

Representative Quotes

"Clearly state that GPS units will be required for all vehicles traveling on the restricted portion of the Park Road."

"If you or I are noticing a direct harmful impact on wildlife/experiences before the end of this time frame, can the plan be amended?"

Response

Monitoring will occur multiple times per season, both remotely (i.e., using GPS on vehicles, traffic counters) and directly (i.e., periodic staff monitoring along the road, at viewsheds, and at rest stops, in government vehicles and on buses. A GPS unit on every vehicle is not necessary.

If conditions change appreciably, new indicators may need to be identified to ensure desired conditions are achieved and maintained. Information on the NPS monitoring efforts, related visitor use management actions, and any changes to the indicators and standards will be made available to the public. All revisions to established indicators and standards would be subject to compliance with the National Environmental Policy Act; the National Historic Preservation Act; and other laws, regulations, and policies.

The park will continue monitoring to ensure any effects from the application of Calcium Chloride are identified early to avoid resource impacts as committed in the *1999 Dust Abatement Activities on the Park Road* Environmental Assessment.

PLAN IMPLEMENTATION

Issue Summary Statement

The public offered additional comments that are best addressed in the implementation phase of the VMP. Comments included suggestions for new technologies for buses, easier accessibility for families, and addressing the needs of campers within the transportation system.

Representative Quotes

“Bus numbers should be reduced and made silent. (electric)”

“Eliminating camper buses is certainly premature until NPS has at least solved the problems of transporting high numbers of campers from campgrounds and providing acceptable external storage.”

Response

The NPS will seek the best technologies available to provide quieter, more comfortable buses in addition to alternative energy and fuel savings.

While outside the scope of this plan, the NPS is committed to incorporating family friendly features and practices in the next concession contract.

The NPS is also committed to accommodating the special needs of campers, hikers, bicyclists, and backpackers along the Park Road. These users should anticipate the same or better level of service.

TRANSPORTATION SYSTEM

Issue Summary Statement

Comments received on the transportation system focused on the prioritization, flexibility, and cost of transit. Suggestions also included the ability for visitors to easily understand the range of choices available in the transportation system.

Representative Quotes

"The final plan needs a better standard for determining appropriate costs for the transit service".

“The ROD should maintain language to address the plan’s goal of making the transportation system understandable and user friendly. The ROD should commit NPS to ensuring the balanced and equitable marketing and booking of all park transportation and tour options.”

Response

The NPS recognizes that basic and affordable access is the priority for the transportation system. After additional review and consideration by non-agency experts, the National Park Service has decided to use “perceived value” in assessing the affordability of the transit service in the new concession contract.

Transit riders will have the opportunity to get on and off the bus at any point along the Park Road. In addition, tour bus passengers will be able to get off the bus and return east on the transit system at any time.

The range of transportation system options available to visitors will be clearly communicated through a variety of means by the National Park Service and its partners (e.g., electronically, printed materials and personal communication).

BEYOND THE SCOPE OF THE PLAN

Issue Summary Statement

Several comments were received that were beyond the scope of the plan. These included suggestions for the development of new facilities (campground and road), and concerns regarding existing facilities (Alaska Geographic sales at Toklat, potential for the increase in the size of rest areas). One comment suggested requiring air transport only to Kantishna.

Representative Quotes

"I would like to see the development of another campground similar to Teklanika that I can drive to within the park."

"Clarify that if rest stop standards or the facility capacity is exceeded, then the tours must be changed rather than expanding the facility."

"Alaska Geographic sales at the Toklat Rest Stop were inappropriately mentioned within this vehicle management plan"

Response

The Denali Park Road Vehicle Management Plan is intended to assist park managers with decision making and management of vehicles on the Park Road. It will inform the development of the next concession contract for visitor transportation on the Denali Park Road. Since the scope of the plan is limited to vehicle management, it does not address facilities or non-vehicle transportation.

Standards based on the designed capacity for the rest areas and the Eielson Visitor Center will be monitored. If standards are not being met, the final plan provides a tool box of management strategies that could be used, which includes changing vehicle behavior and use to favor the transportation system. Any changes or additions to park facilities would be considered under a different planning effort and would be subject to compliance with the National Environmental Policy Act.

Given that the Alaska Geographic sales at the Toklat Rest Stop are part of the current condition, analysis included this feature and its effects in the EIS.

ATTACHMENT B: DETERMINATION OF IMPAIRMENT

Denali Park Road Vehicle Management Plan and Environmental Impact Statement

A determination of impairment is made for each of the resource impact topics carried forward and analyzed in the environmental impact statement for the preferred alternative (Alternative D). The description of park significance in Chapter 1 was used as a basis for determining if a resource is:

> Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
>
> Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
>
> Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

Impairment determinations are not provided for park management and operations and socioeconomics, because impairment determinations relate back to park resources and values. These impact areas are not considered to be park resources or values.

BIOLOGICAL ENVIRONMENT TOPICS

Wildlife and Wildlife Habitat

One of the broad purposes enumerated in the park's enabling legislation is to preserve sound populations of, and habitat for, wildlife species. Wildlife and wildlife habitat are also identified as distinguishing resources in the park's significant statements and Congress identified wildlife populations and wildlife habitat as fundamental park resources.

Alternative D would have a local, long-term, moderate, adverse effect on wildlife and wildlife habitat along the Park Road corridor. This effect would primarily result from the continued, and potentially increased, number of moving or parked vehicles on the Park Road and increases in off-bus human activity at transportation nodes. Due to increased traffic during daily off-peak

hours and during the shoulder seasons, this alternative would likely increase adverse effects on wildlife. The alternative would have adverse impacts on wildlife behavior, movement, and stress levels. However, this alternative would also benefit wildlife and wildlife habitat from actions such as comprehensive monitoring programs and adaptive management measures (e.g., use of indicators and standards and a BACI study) and reductions in private vehicle use.

Wilderness

Congress identified wilderness as a fundamental park value. Denali National Park and Preserve has 2 million acres of designated wilderness that surround the project area.

Alternative D would result in a local, long-term, moderate, adverse effect on opportunities for solitude and the undeveloped, natural, untrammeled qualities of the surrounding wilderness lands along the Park Road. These adverse effects would primarily relate to the continued (and potentially increased) visual and noise disturbances to wilderness and the area's ecological system from vehicle use along the road, unnatural conditions, and concentrated human activity. When compared to alternative A, this alternative could worsen the disturbances to solitude and natural conditions due to possible increases in bus traffic and increased off-bus activity. However, alternative D would also improve the preservation of wilderness character compared to alternative A from actions such as adaptive management measures and some reductions in private vehicle use.
Overall, impacts to wilderness would not result in impairment because the use of the best technology for providing quieter, more sustainable buses will be used and traffic will be managed to provide a level of resource protection that is equal to, or better, than the current condition.

SUMMARY

Anticipated impacts associated with the implementation of alternative D would not constitute impairment on park resource values. This includes resource values whose conservation is necessary to fulfill the enabling legislation or proclamation of the park, or values identified as significant in the park's general management plan or other relevant NPS planning documents.