

## Denali Citizens Council



*Advocating for Denali's Wilderness, Wildlife and Way of life.*

October 22, 2018

Dear Superintendent Striker,

This letter is a follow-up to our earlier discussions on June 6<sup>th</sup>, 2018 regarding vehicle management along the Denali Park Road. Since that meeting, our members have raised a number of concerns about management of the bus system, and we continue to be troubled by a trend of decreasing accountability in the vehicle management system generally. Here are our questions, concerns, and requests.

- During our earlier meeting you indicated that real-time data on vehicle use on the park road was a goal of park management, and that you expected to achieve that goal at the start of summer 2019. We applaud that goal and further hope that the data can be shared, real-time, with the public. We realize that data quality control does not happen instantly, but would hope that corrections (if any) can be transmitted at later dates - once the draft data is finalized - without losing the value of real-time. Do you still expect to implement this system in 2019?
- We hope that this new approach to data management will not suffer from the same delayed reporting issues as 2017 and 2018 data. Even though there are two separate teams of staff that collect vehicle data – the staff at the Savage Check Station and the Road Ecology Team – no comprehensive vehicle data from either 2017 or 2018 has been made available to the public in any manner that we are aware of. If we are mistaken, please direct us to where we can obtain it.

In addition, from what we understand, no 2017 data from the Savage Check Station (SCS) has even been consolidated for management's use, and indications are that data from 2018 is no better off. This data has been used in the past to inform a context for decisions on inholder travel, professional photographer travel, administrative use, and bus use. The data is also fundamental in informing park management concerning compliance with restrictions on vehicle use past the SCS, both for the still-in-regulation 10,512 annual vehicle limit, and for the VMP 160 vehicles-per-day limit. Another value of the SCS data would be to address rumors that TWT buses are going out with plenty of empty seats. Why JV would resort to such a practice is a mystery, unless our informants are seeing a lot of MSLC groups on tan buses. The passenger data from SCS would confirm or dispel the rumors.

The 2017 Annual Vehicle Management Plan (VMP) Report, as required by the VMP, is long overdue, a situation that makes it very hard to understand what issues park management and visitors are facing regarding vehicle management, much less what alternatives management has available to resolve VMP violations.

We are seeking two specific responses to these concerns. First, when do you expect to publish the 2017 and 2018 reports? Second, we would like to obtain copies of the complete SCS data as soon as possible for both 2017 and 2018.

- During our meeting this summer, we were very troubled by NPS's lack of interest in the regulatory 10,512 vehicle limit. While we understand that NPS wishes to limit vehicles using the standards in the Vehicle Management Plan, the prior regulation is still in effect. At least as long as the regulation stands, we would like to see NPS report on compliance with the 10,512 number using comparable methodology to prior years. It would take very minimal time to generate this number along with the rest of the reporting, and would give the public a sense for how much the traffic has increased over prior practice, which individuals could then compare to their personal experience on the road.
- Also troubling to us is that NPS is observing a violation of one standard (sheep gap) but is continuing to allow increases in vehicle traffic before demonstrating a successful resolution of the violation. Yes, there are several actions you have identified to address the issue. But it seems that if resource protection is (appropriately) the NPS's first priority, you would first take those steps and monitor to see if the intervention worked, and only then allow any more traffic. That would be the conservative approach. We – along with many others – felt from the beginning that the Vehicle Management Plan approach tilted way too far in favor of expanding visitation without assuring protection of the resource. Would NPS commit to freezing vehicle traffic at current levels until the sheep gap standard is positively resolved?
- Finally, members continue to call our attention to the disparity between marketing of the tours vs. the transit services. While we obviously don't have the data on ridership, a cursory visit to both the NPS and Joint-Venture websites make it clear that in online reservations the accusation has merit. Even if visitors start out reading about the "non-narrated transit" option on the NPS website, they are likely to get channeled into a choice of tours once following the links to reservedenali.com. This issue of information/marketing disparity has been raised for years; what will NPS do to address it?

We would appreciate a reply to these concerns and requests. Our intention is to publish this document as an open letter for our members. We would be happy to publish your response as well. If you can get us a response within 2 weeks we could publish them simultaneously.

Thank you,



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DCC Board of Directors

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