



THIRD DRAFT OF OCTOBER 12, 2011, FOR ATIA MEMBERSHIP REVIEW AND COMMENT . . .

October __, 2011

Denali National Park and Preserve Planning
PO Box 588
Talkeetna, AK 99676

Dear Park Planners,

Thank you for providing the Alaska Travel Industry Association (ATIA) the opportunity to comment on the Denali Park Road Vehicle Management Plan. This plan has monumental implications for the travel industry over the next twenty years, and, as a result, we have engaged the full range of visitor businesses, large and small, in a comprehensive series of meetings and discussions over several weeks in composing these comments. All ATIA members had the opportunity to contribute to the draft.

ATIA represents over 1,100 member businesses servicing the tourism industry in Alaska. Denali National Park and Preserve is one of the premium destinations for Alaska visitors and many of our member companies have products that in some way include this park. Since the experience of the vast majority of park visitors is in some way connected to the park road, your undertaking is of immense importance to our members. Our members serve a wide variety of park visitors from backpackers to budget travelers to premium tour passengers to patrons of the lodges in Kantishna. It is our sincere attempt with the comments within to acknowledge the right for the full

spectrum of visitors to have experiences of the highest possible quality in Denali National Park and Preserve. Continuing involvement in the planning process for the Denali Park Road Vehicle Management Plan is a priority of our Tourism Planning Committee.

ATIA desires that tourism resources be developed in a prudent manner to assure long term sustainability of the wide diversity of tourism businesses, small and large. In so doing, we recognize the importance of remaining attentive to caring for the environment, the recognition of cultures, and to Alaska's unique quality of life.

Introduction

IMPORTANCE OF DENALI NATIONAL PARK TO ALASKA'S TRAVEL INDUSTRY

Since 1980, a vast area of land in Alaska was added to our National Parks, Preserves, and Monuments. Now some 15 park units encompass 54 million acres of Alaska. What has not changed in all these years since is this: Denali National Park and Preserve remains the only National Park whose borders are accessible to Alaska's paved highway system **and** has a road providing access to its remote areas. Some Parks have primitive roads touching their borders (Wrangell St. Elias, Gates of the Arctic, Kenai Fjords, Yukon-Charley) and some parks have limited primitive roads within them (Katmai, Wrangell St. Elias) and some can provide large and small boat access for large numbers of visitors (Glacier, Kenai Fjords), but no National Park, other than Denali, has both highway access and a road penetrating into its interior. Add to this Denali's unique geographical position between Alaska's two largest communities and two largest airports (Anchorage and Fairbanks), and it is no mystery why Denali is still a critical component to the entire state's Tourism Industry, from Ketchikan to Barrow.

The tourism economy is critical to Alaska (Tourism is one of Alaska's largest industries, one of Alaska's largest generators of employment, with over \$1.6 billion annual contribution to Alaska's economy, not including good and services coming from

outside the state), and the economic importance of Denali National Park and Preserve to Alaska is tremendous. In an ideal world, increased access to Alaska's other national parks could take some pressure from Denali in this regard. The fact is, though, we don't see much evidence of this changing over the next 20 years. While we acknowledge that the unique resources that make Denali so special (the wildlife, the pristine landscapes, the unique ecosystems, the high mountain scenery) must be appropriately safeguarded, for the aforementioned reasons we believe that the next twenty years should provide for optimum access for the wide spectrum of visitors to Denali while attending to those safeguards. We believe the Denali Park Road Vehicle Management Plan provides such an opportunity.

PUBLIC ACCESS TO NATIONAL PARKS TAKES MANY FORMS

There appears to be an expressed bias by the National Park Service to maximize access for low cost, transit bus access for riders and that this is the preferred access mode of the general public. While we certainly acknowledge that a substantial amount of access must be guaranteed for the lowest cost transit riders and that a methodology must be present to make this type of access reasonably priced, we wish to point out that the general public actually chooses from a wide range of options for their visit to Denali National Park. These options include, and are not limited to, riding the Transit buses in an unguided fashion (both staying on the bus and getting off to hike); choosing guided, Premium Bus Tours because of the value added to the experience and/or as a part of a multi day package in Alaska; choosing a more interactive and small-group park experience by booking a trip with one of the Kantishna Lodges; and driving a car or RV to the park area to enjoy a camping experience. Please note that all of the above are park visitors and constituents of the "general public".

Alaska's parks are far north and remote: distance between parks and other protected areas can be expansive, wilderness conditions are ever present, wildlife dangers are always a potential, and the northern climate can be extreme, even in summer. Many Alaska visitors choose to visit National Parks in a tour or guided format in acknowledgement of the value added component in facing these barriers and

challenges. Indeed, most of the first visitors to Denali National Park back as early as 1923 enjoyed a full-service, guided, and outfitted experience with horse transportation (later motorized) to Savage Camp on the Savage River. It is unreasonable and inequitable to assign a priority to one form of use of the General Public without defining relative priorities of other forms of general public use.

LOW COST TRANSIT OPPORTUNITIES AND PREMIUM TOUR VOLUME ARE INTRINSICALLY LINKED, BOTH ARE ESSENTIAL, AND THEIR INTERRELATIONSHIP SHOULD BE ACKNOWLEDGED AND FORMALIZED.

The Visitor Industry acknowledges the priority to provide access to Denali National Park and Preserve through a simple Transit bus system that is as affordable as possible to those who want to or can only afford to get access in this manner. Cost should not be a barrier to providing unique natural experiences in our National Parks. However, it is broadly recognized that, in the current and any likely future contractual arrangement, reasonably priced transit service is not possible without a certain volume of Premium Tours. The price and volume of Premium Tours subsidizes the lower cost and less efficient occupancy (to facilitate hikers and campers) of the transit tours. We believe this essential link between the two types of services should be formally recognized and empirically established. A desired volume of Premium Tours creates the condition where reasonable pricing of Transit service can exist. The latter cannot exist without the former. Our Visitor Industry Alternative proposes such a prescribed relationship.

Visitor Industry Alternative

EXECUTIVE SUMMARY OF VISITOR INDUSTRY ALTERNATIVE

The Adaptive Management approach should be pursued, but the safety net of a Fall-back Plan to the 10,512 vehicle limitation, with appropriate modifications, should be

included in the final plan in the case that funding of the necessary research or other conditions exist that make Adaptive Management unsuccessful.

The Visitor Industry prefers Alternative B, with some important modifications.

Transit service and the Self Guided Economy Tour riders would be combined into the same service (as they are in the existing condition) but not differentiated into separate products.

Guided Premium Tours would consist of a short tour to Teklanika (4½ hours), Premium Long Tours to Toklat/Stony Dome (same as today's Tundra Wilderness Tours), limited Premium Long Tours to Eielson Visitor Center, and limited Premium Long Tours to Kantishna.

The allocation of buses to the Transit and Premium Long Tours would be linked in a set ratio that would only be altered temporarily from season to season to adjust to market demands.

With regard to Other Vehicle Use, the Travel Industry Alternative is in general agreement with the concepts presented in Alternative B.

Other Long Range Planning concepts are presented, consistent with our previous submission.

VISITOR INDUSTRY ALTERNATIVE

1. The Adaptive Management Approach and the Fall-back Plan.

The Alaska Visitor Industry prefers Alternative B, with the important modifications specified below and, in addition, with a built-in Fall-back Plan if the Adaptive Management approach fails for any reason. We believe that the Adaptive Management approach provides more opportunity and flexibility compared with managing against a

hard number of vehicles, as is currently provided under the 1986 GMP, and we support this approach. However, such an approach must be taken thoughtfully and with an appreciation of the park Vision Statement. Assessing wildlife fluctuations and behavior appears to be an imprecise science and fluctuations and behavior may be impacted by factors other than vehicle frequency, such as weather, climate, seasonal availability of food sources, animal to animal interactions, etc., which need to be taken into consideration prior to any major changes to the transportation system. Indicators need to be weighted appropriately, and the efficiency of vehicle utilization needs to be factored in as well.

Social science indicators of crowdedness need also be assessed thoughtfully as virtually all respondents would likely acknowledge preference for a more solitary park road experience. Sufficient checks and balances need to be incorporated into the decision process so that changes responding to indicators would result in tweaks and improvements and not radical modifications. In addition, increased quality of interpretation, especially with the Transit service, would serve to enhance the understanding of visitors of the benefits and rationale of the bus transit concept in its relatively harmonious impact upon wildlife as opposed to passenger car alternatives. This alone would result in more favorable results on visitor surveys and an enhanced appreciation for Denali's unique access system.

The Visitor Industry must plan ahead at least two years prior to operating in any given year, and a certain level of volume and predictability is required. The current system has generally allowed for this and the new system must as well. We strongly recommend that the new plan includes a provision where any reduction in volume of Premium Tours requires a two year advance notice whereby the Visitor Industry can adequately plan for success. It would be extremely difficult and cause severe disadvantages to the entire Alaska Travel Industry if dramatic changes are made with less than a two year warning.

While the Adaptive Management is a progressive and positive approach to maximizing a full range of visitor experiences without degrading the natural

environment, it is not without issues. Here are the questions that this approach poses for the Visitor Industry:

- a) Will Adaptive Management work in the long run? It appears experimental, complicated, and it is to be played out over many years.
- b) Can the substantial funds to perform the necessary monitoring be assured?
- c) Will unending experimentation and yearly tweaks eventually result in a system less efficient (less volume, less predictable) than the status quo?

For the aforementioned reasons, we believe a Fall-back Plan should be built into the New Vehicle Management Plan in the case that Adaptive Management proves unsuccessful or if the critical funding for the essential monitoring is cut to such a level to make the management plan unworkable. The Fall-back Plan would consist of the current No Action Alternative, with the following modifications:

- a) The lessons learned from Adaptive Management, the data collected, and appropriate monitoring can be used to improve the existing condition.
- b) The hard cap of 10,512 maximum vehicles during the designated season has been relatively successful, has evolved over time, and has been tweaked and improved upon over the years. It could be improved upon with the addition of the provisions of the Other Vehicle Use section of Alternative B.
- c) We propose the 10,512 limitation of the Fall-back plan would not include the vehicles used for the Teklanika Premium Tour as described herein nor would it include contractor traffic for road and other improvements (just as the DNHT and contractor traffic does not count against the road limit today). In addition, it would NOT have set limits on any particular type of service and this would allow flexibility to move allocations between service types.

The Fall-back Plan could be triggered by funding cuts or other conditions that exist that make Adaptive Management unsuccessful. Alternatively or in addition, the Fall-back Plan could be triggered by a 5 year review to assess the performance of Adaptive Management. Regardless of whether or not Adaptive Management continues to be implemented, we recommend a 5 year review of the plan to provide stakeholder involvement.

2. Transit and Self Guided Economy Tour.

In our vision, Transit service and Self Guided Economy Tour riders would be combined into the same service (as they are in the existing condition) but not differentiated into separate products. The Transit system would be adequately explained to provide both access for off bus experiences (camping and/or hiking) and also for the most economical way to experience the park road without departing the bus, or any combination thereof. Optional interpretive materials could be made available to ANYONE who wanted them, be they campers, hikers, or stay-on-the-bus travelers. The same pricing scheme would be consistent whether you got off or stay on the bus, and anyone could purchase interpretive tools to enhance their visit. Minimum but somewhat standardized interpretive messages would be provided by drivers without the intention of providing a fully narrated tour. Interpretive messages would include basic safety, park purposes, and the rationale and benefits of the Vehicle Transportation System. Since the level of interpretation would be basic and minimal, in order for visitors to accurately distinguish between the Transit service and the Premium Tours, for the purposes of marketing this trip, it would not be described as a narrated tour.

We encourage pre-booking of the Transit buses up to 50% capacity, and we encourage the design of a system where visitors can also pre book the return trip from an intended point along the Park Road to assist with bus management on a daily basis.

3. Guided Premium Tours.

Guided Premium Tours would consist of the following:

A) **Premium Short Tour to Teklanika.** The Premium short tour to Teklanika would be approximately 4 ½ hours in duration and these tours would be offered to designated locations throughout Wildlife Viewing Subzone 1 (Savage River to Teklanika). Topics and activities for the short tour would be standardized (i.e. wildlife, park history, wilderness) to increase operating efficiencies in training and marketing. Off the bus interpretive/interactive experiences would be conducted along the way. While each Tour should have an experience of equal quality, it may be possible to include different “off-the-bus” interpretive experiences for different buses so that bottlenecks are not created. For example, one bus may experience the living history cabin experience (similar to what is now in place for the Denali Natural History Tour) and another may experience a loop hike with interpretive staff and/or signage and exhibits. All tours could end with option to visit the entrance Visitor Center.

There are several important goals of this trip: 1) to provide a short, quality alternative to the Premium Long Tours; 2) to provide a more in-depth park experience than is currently provided by the DHT; 3) to provide enough volume to reduce pressure from the more sensitive park habitat beyond for the next 20 years; 4) to help assure that visitors take a trip that is best suited for them to increase the satisfaction levels of both the longer and short tours; 5) to maximize the use of the section of the road that is engineered best for volume while containing less sensitive roadside ecosystems than the road beyond.

For the reasons stated above, the Adaptive Management plan for this section of the Park may be more liberally applied.

B) **Premium Long Tour.** These tours would be offered predominately from the Park Entrance to Toklat/Stony Dome (7-8 hours), as they are today.

The tours would start with a pickup at the local hotels or with a pickup at the Wilderness Access Center.

A limited amount of Premium Long Tours would extend to Eielson Visitor Center (9-10 hours), the daily quantity of which would be determined by the combination of market demand and facility constraints (capacity of the Visitor Center and parking at Eielson Visitor Center).

Premium Long Tours to Kantishna could be offered on a limited basis to meet limited demand, as they are today. However, if demand decreases for this tour in the years ahead and/or a growing demand exists for the other Premium Tours, this tour should be eliminated, thereby allowing the day trips of the Kantishna Lodges to meet the remaining demand for this trip.

In general, we believe, unless market demand dictates otherwise, the total of Premium Long Tours should equal or exceed Transit buses due to fact that the volume of the Premium Tours help keep the Transit service reasonably priced. In this way, the allocation of buses to Transit and Premium Long Tours would be linked in a set ratio that would only be altered temporarily from season to season to adjust to market demands.

4. Creation of Transportation System Advisory Council

We recommend the formation of a Transportation System Advisory Council or Committee made up of a wide range of stakeholders including but not limited to a range of tourism representatives representing multiple segments of travel. This group could meet annually to review the system, review relative allocations of the buses over the various tours and transit service, and recommend improvements. This same group could be involved with the 5 year review process of the Adaptive Management approach

and also be involved if there is ever any transition to the Fall-back Plan of the 10,512 vehicle limit, with modifications proposed herein.

5. Other Vehicle Use

With regard to Other Vehicle Use, the Travel Industry Alternative is in general agreement with the concepts presented in Alternative B, with the exception noted below.

For the Kantishna Lodges, no daily limits should be applied to the day trip service so long as they are within their overall permit allocations for each season. It should be up to each lodge to run their businesses as they see fit.

6. Additional Comments

TOUR ALLOCATON SYSTEM AND NPS ROLE

It is very important for NPS to recognize that the seat allocation, inventory control, comparable pricing and competitive marketing of tour products can be major contributors to the number of vehicles on the Park Road. Expanded tour choices, improved logistics, higher quality experiences, and enhanced vehicles collectively will not necessarily resolve current problems without enhancements in the tour inventory, pricing structure, and allocation system. For this reason, we believe NPS must take a more active role in managing the transportation contract after it has been let.

All tour companies should have a fair playing field in receiving tour allocation. If an allocation system is necessary, it should be addressed in a manner that is flexible and transparent. Industry involvement in designing such a system should be sought prior to putting the specifications of such a system out to bid. ***In addition, once the***

transportation service has been contracted, an annual review by NPS and stakeholders to consider improvements should be conducted.

The current inventory, tour pricing, and reservation processes often do not accommodate the choice of the individual visitor within a tour program in an efficient manner. Tour operators and packing companies are unable to receive block for all park tour and VTS options. This creates an inflated demand on the longer tour seats thereby potentially increasing the number of vehicles on the Park road unnecessarily. In the event of the availability of two or more high quality and premium priced tour options of varying lengths, such as proposed in this document, an improved inventory, rate structure, and reservation system to accommodate limited individual choices of the visitor should increase the quality of the visitor experience and decrease the number of visitors taking a trip not best suited for them. Allowing a limited number of passengers to change their choice with short notice could also be considered if the inventory system will also help in managing these options effectively.

The future concession agreement should include a rate structure that allows for qualified park “Tour Re-Sellers” who provide the widest marketing value and distribution such as package tour operators and wholesalers, as well as to point of sale resellers such as qualified area hotels and travel agents. The travel industry typically has an established commission structure that will reward Re-Sellers for marketing and booking any premium tour that is the most suitable for the clients’ interest, allowable time, and budget. The industry standard is 20% discount for qualified Wholesalers and 10% for qualified Travel Agents off of the “Rack Rate” pricing that is established by the National Park Service and/or the Concessionaire. The Premium Tours and the Transit service should be commissionable on this basis.

As mentioned previously, up to at least 50% of the capacity of the Transit buses should be allowed to be pre-booked under generally acceptable industry terms. This

would eliminate the 8 seat limit and would not require the inclusion of specific names at the time of the initial booking.

Lastly, the tour mix and respective capacities should be evaluated regularly to ensure tour mix is meeting visitor demand. As the industry evolves over the next 20 years and passenger expectations shift, there must be flexibility to respond to the market.

NOTES ON ROAD SAFETY

Every effort should be made to improve any section of road where basic safety is a concern. Safety should take priority over managing for a “primitive road experience”. An extra 6-10 feet of road width around a narrow curve will not be viewed as “less wild” or “less primitive” by park visitors. The visitor industry would welcome the opportunity to propose specific areas for road improvements.

In particular, since our alternative contemplates a high volume Premium Tour to Teklanika that may involve larger and more comfortable vehicles than those which traverse the entire length of the road, it will be important that the first 30 miles of the Park Road are engineered properly for the volume and vehicle size anticipated.

BEST STEP FORWARD FOR TWENTY YEARS

The Travel Industry takes seriously the opportunity to plan for the next twenty years. Once a transportation concept has been developed, we recommend the Park Service convene an unbiased team of experts composed of consultants with extended experience in visitor services, logistics, and interpretation both inside and outside of the Park Service and inclusive of professional tour providers. Every opportunity should be taken to provide for the highest quality visitor experience possible and “out of the box” thinking should be welcome. The public and the visitor industry should have an opportunity to provide input in the process. The funds necessary for thoroughly examining options to enhance the quality of the visitor experience would be well spent.

PREPARE FOR CAPITAL AND OPERATIONAL EXPENDITURES

While we realize that it is not within the parameters of this planning process, to truly enhance the visitor experience in Denali National Park, we believe it will be necessary to think beyond vehicles and vehicle logistics. Over time, capital and operational expenditures will be necessary for parking improvements, visitor centers in key locations, improved rest stops in key locations, trails, interpretive staffing, covered and enclosed gathering and dining areas, and road improvements. Such improvements are can be phased in over time and may include:

- Parking and turnaround areas enhanced as needed at Teklanika and Eielson.
- Covered and heated pavilions or areas provided for sitting or dining at Teklanika, Toklat and Eielson. In addition, “take in/take out” of foods with each bus may be appropriate, but the possibility of beverage and/or or snacks and/or provision of simple snacks, beverages, and meals should be considered. Visitors need space to get out, move around, have contact time with the Park, and have a pleasant dining experience rather than be expected to get by on a “snack” eaten uncomfortably on a bus.
- A substantial Visitor Center at Teklanika as well as an amphitheatre for interpretive presentations. This may be best placed in an area distinct and separated from the Teklanika rest stop that services Transit and Long Premium Tours.

In closing, as the planning process continues, we look forward to working closely with the National Park Service to ensure that the final plans provide a wide range of the highest quality experiences for visitors to Denali Park and Preserve while protecting the unique resources that make the Park a rare and special place.

Respectfully,

_____, Chair ATIA Board

_____, Tourism Planning Subcommittee Chair

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