

ATTACHMENT A: NPS Responses to Comments and Errata to the Environmental Assessment for the Construction of a New Eielson Visitor Center and a Permanent Toklat Rest Stop

ERRATA

**Environmental Assessment
Construction of a New Eielson Visitor Center and a Permanent Toklat Rest Stop
Denali National Park and Preserve, Alaska
June 2004**

NPS Responses to Substantive Comments

The NPS received a total of 10 sets of comments. These comments were either letters mailed to the superintendent or emails sent to the park web site or to the NPS public comment web site. The following parties made comments:

1. Northern Alaska Environmental Center
2. Dale Ebben
3. Denali Citizens Council
4. Bruce Lee
5. John Miller
6. Katherine Swift
7. Sue Deyoe
8. Jeralyn Hath
9. National Parks Conservation Association
10. State of Alaska

Responses follow the comments below. Many of the comments are paraphrased or summarized from the original comments.

1. Northern Alaska Environmental Center (NAEC)

NAEC-1 (also DCC, SD) states that the proposed Eielson Visitor Center (Eielson) is too large, that it would be over twice as big as the present structure. The justifications stated - such as Eielson gets extremely crowded at times, that there are not enough toilets at times, that there is no protected eating space, that there is not enough exhibit space, and that some areas are not accessible - are neither explained nor compelling arguments for such a large building. They contend that NPS should state what the ideal number of daily visits NPS is planning toward.

The average summer visitation for the current Visitor Center is approximately 120,000 people (including double stops). When the building was constructed in 1959, the summer visitation to Eielson was likely no more than 20,000 out of the total park visitation of

26,000. Increased numbers of visitors to Eielson are anticipated through modifications to bus schedules and destinations. The square footage for the visitor center was determined through user identification of needs via joint recommendations by NPS, the Alaska Natural History Association, and the major concessionaire, Joint Venture (JV), and through a computer programming model that helps define square footage requirements for NPS visitor centers. Throughout the design process the designers were careful to limit the overall square footage and keep the building footprint as small as possible. The call for replacement of the Eielson Visitor Center in the DCP/EIS anticipated that “...expanded interpretive facilities and services, including a new Eielson Visitor Center, will significantly enhance the tours into the interior of the park.” (DCP/EIS, p.15)

NAEC-2 (also DCC, SD) The Environmental Assessment (EA) did not offer a range of alternatives on building size or space allocation.

As outlined in the EA, the NPS design process began with six building designs, three of which were selected for further development and refinement. A Value Analysis engineering effort analyzed space needs, cost per square foot, and building design to develop the best possible alternative. This design was presented to the NPS Development Advisory Board and received approval.

NAEC-3 (also DCC, SD) two EAs should have been presented, one for Eielson, and one for Toklat.

NPS is required to address in NEPA documents the connected actions of projects. The build-up of facilities at Toklat is directly related to the need to house the Eielson functions during the two years of construction at Eielson. The reclamation actions at the former gravel extraction and processing site in the alluvial fan at Toklat and the installation of bank stabilization at Toklat are not directly related to Eielson replacement, but they would be impossible to separate geographically and temporally from the site plan for the Toklat Rest Stop.

NAEC-4 (also DCC) questions whether the NPS used its own VERP (Visitor Experience and Resource Protection) process when determining the carrying capacity of the proposed Eielson versus the visitor experience and resource impacts related to its design.

NPS used the VERP process during the formulation of alternatives in the 1997 DCP/EIS, when both the Eielson and Toklat projects were conceptually approved. The actual user needs for Eielson and Toklat are dependent on the experiential carrying capacity of the park road, which was stated in the 1986 GMP and recently formalized in federal regulation. The new Eielson and Toklat facilities were designed for a user carrying capacity that equaled the user needs.

NAEC-5 (also DCC, SD, NPCA) questions the financial capability of the NPS to be building a \$7 million facility when there are budget shortfalls for the purpose of staffing interpretive programs and facilities.

By federal rules, construction money cannot be used to pay staff salaries. The NPS has requested operational funding for the fiscal years after Eielson is finished so that essential visitor services will be furnished.

NAEC-6 (also DCC) questions whether the creation of an improved destination at Eielson will require upgrades of the park road and loosening of the road vehicle limits, thus affecting road character in ways not addressed in the EA.

The park road vehicle limit for almost all vehicles heading west of the Savage River during the main part of the visitor season is capped by federal regulation. Within that limit, and in exchange for reduced vehicle use by professional photographers, the DCP/EIS does permit bus totals to increase up to 6 per day over the 1997 daily bus limits. Should wildlife tour buses - which now turn around at Toklat and Stony – be sent to Eielson, the NPS does not anticipate that the extra bus traffic would require additional maintenance or project work on the park road between Stony and Eielson. That section of road was upgraded in the mid-1980s, and there are no backlogged project proposals for it, aside from isolated soft spot digouts.

NAEC-7 (also DCC, SD) wonders whether the creation of an improved destination at Eielson will lead to increased visitation with accompanying adverse impacts to the wilderness character along the road corridor not addressed in the EA.

The NPS encourages all visitors to take time to explore the wilderness resource values of the park off the road. Experience shows, however, that most visitors will not tarry far from their vehicle. The tour bus population is even less inclined to wander any distance from their vehicle or driver, and should more of the tour buses drive to Eielson, what limited impact there would be from the additional visitor population would be to the immediate building and grounds.

NAEC-8 (also DCC, SD) states that the bus dispatcher in the new Eielson should have a view of the parking lot, should be close to the driver lounge, and should be obvious and available to the bus passengers, all in order to maintain good operational order of the bus system.

The Bus Dispatcher will have video surveillance of the parking area. An intercom system, with messaging capability, will be installed between the staff break room and dispatcher to allow for communication. The location of the dispatch window is within view of the main entrance to the visitor center but is located such that the visitor does not mistake it for the main information desk.

NAEC-9 (also DCC) notes the lack of specificity on where the solar panels would be placed on the new structure, and also wonders what impacts will occur to sound quality and water quality from use of a hydro plant, and how much the alternative energy installations would cost relative to each other.

Solar Panels will be located along the edge of the roof, facing south and angled such to maximize solar collection for the summer months. The solar panels location and type will be selected for low reflective quality and will be placed to minimize the visual impact from south, across the valley. The solar panels will also be placed along the south side of the maintenance building, where the batteries will be stored. There would be no impacts to water quality from the use of the water to push the blades of a turbine in a small hydro plant. NPS will select a hydro plant that provides maximum sound proofing to go with reliability and energy production. NPS hopes that funding for the demonstration project to showcase different alternative energy applications will include an interpretive component that tracks a cost comparison of the different installations.

NAEC-10 questions the appropriateness of building the Toklat Rest Stop in an alluvial fan with a flash flood hazard. They state that there might not be enough time for drivers and other on-site personnel to round up all the visitors to transport them out of the hazard zone should a flood event occur. Additional sites out of the hazard zone, such as 300 feet to the west, should be evaluated in the EA.

The area draining into the alluvial fan is small in size and NPS believes that a large flash flood cannot be generated in that drainage. The flooding that is anticipated would have a generous lead time, and staff and drivers would have sufficient warning and time to evacuate as necessary. A rest stop site 300 feet to the west would still be in the alluvial fan, though in a part of the fan that has been inactive for over 30 years. A site there would be in important bear habitat and would put visitors at greater risk from bear encounters.

NAEC-11 (also DCC, BL, JH, SD) states that the proposal for the Toklat Rest Stop goes beyond the intent and structures approved in the 1997 Entrance Area and Road Corridor Development Concept Plan/Environmental Impact Statement (DCP/EIS).

The DCP/EIS proposal for the Toklat Rest Stop includes parking for 5-8 buses, wayside exhibits, a loop trail, comfort station and shelter – plus utilities such as sewage treatment that are not addressed in this EA. The approved parking lot has been expanded in the EA to include room for those buses staying longer at Toklat during construction at Eielson. The “loop trail” plan has been cut back to a riverside trail, which could be used as a loop if one includes the service road. Wayside exhibits are part of this plan, as are toilets. The “shelter” concept was expanded in the preferred alternative to include a bus dispatch office, interpretive office and book sales office – necessary during the Eielson Construction – and a “visitor cabin,” which would house interpretive displays and be a protected gathering place for interpretive talks.

Limited funding for Toklat Rest Stop sitework, toilets, and soft-sided structures is included with the Eielson construction funds. Funding for other permanent structures at Toklat is not anticipated until 2009. NPS agrees at this time that those permanent facilities would not include a bus dispatch office, interpretation office and structure for book sales. The permanent Toklat Rest Stop would include one or more sheltered areas –

such as a pavilion – for protection from the rain for visitors and as a protected area for interpretive talks and exhibits.

2. Dale Ebben (DE)

DE-1 (also DCC) requests that a plan be developed to mitigate impacts from increased use in the Stony area during Eielson construction.

Operational controls will evolve as problems arise from options available to bus visitors at Stony. Stony is a justly famous place from which to take a picture of Denali, but the dry tundra may attract more visitors off the road than currently wander about. Use at Stony will be carefully monitored and managed by NPS and Joint Venture to minimize additional impacts to park resources.

3. Denali Citizens Council (DCC)

DCC-1(also JH) relates a concern that access and interpretation are overtaking wilderness preservation at Denali, that the creation of a destination with a focus on indoor exhibits and amenities will remove the focus on Eielson as a protected viewing platform, that the lure and experience of the adjacent primeval nature should not be derailed by well-intended entertainment inside the visitor center.

Two management goals for Eielson – in addition to appropriate size and function - have been stressed during the planning process: hide the building within the landscape and encourage visitors to get out into the landscape. The facility is sized to accommodate visitors at the site on bad weather days and to provide an interpretive experience when the mountain is obscured and the weather does not invite hiking. On good weather days the NPS hopes that the information and exhibits inside will stimulate the visitor to use the outdoor viewing decks, hike on the designated trails around the VC, or venture beyond the end of the trails and then use the facilities as needed.

DCC-2 states that the public overwhelmingly supported the proposal in the DCP/EIS to replace the existing Eielson “with a facility of appropriate size and function,” but that the facility proposed in the EA is too big and may include too many functions.

The building is appropriately sized for the number of visitors per day and for the functions necessary for visitor necessities, for the NPS vision for interpretive capabilities at the site, and for the infrastructure necessary to support the desired functions. (See also NAEC-1)

DCC-3 contends that the analysis does not evaluate impacts to wildlife habitat from project trail construction and increased off-trail use.

Trail construction in this project is limited to putting in a new connection between the building and the trail constructed in 2000 which winds down to the bench below the visitor center. The work will be near the building and impacts to wildlife habitat would be

miniscule in acreage and not separable in terms of disturbance from the standard human and vehicular activity at the visitor center.

DCC-4 contends that the Toklat Rest Stop should be built before beginning Eielson construction.

NPS made every effort possible to change the construction schedule to allow for Toklat to be completed before Eielson. Funding was not approved for the permanent Toklat facility until fiscal year 2009.

DCC-5 is concerned that fire exits will lead visitors to steep slopes should there be a fire.

Eielson will have four fire exits. The ground to the west and south does slope away relatively steeply, though not abruptly, but the ground to the north and east is at less than 5% grades.

DCC-6 (also SD) contends that the lockers should be located in a less high traffic area.

The lockers should be located where there is 24-hour access and that is the reason that they are located in the vestibule to the bathrooms, an area open all day. People using the lockers should take their packs to other areas to open them up.

DCC-7 suggests that the parking lot at Eielson should be better designed to expedite buses exiting westbound.

The parking lot was designed to accommodate the maximum number of buses and to improve visitor safety in the parking area. The turning radius and slope influenced the decision to have all buses exit from the east side of the parking lot.

DCC-8 requests that a map of turnaround sites between Stony and Eielson be made available to drivers.

NPS agrees.

4. Bruce Lee (BL)

BL-1 suggests that ANHA book sales, normally housed at Eielson and scheduled to be moved to Toklat during Eielson construction, should instead move temporarily to the Teklanika Rest Stop because Toklat is going to be busy enough during the Eielson construction.

The Teklanika stop is designed to be a short one for all bus passengers, because they are either eager to get further into wildlife country or eager to get to their home base. At Toklat, as at Eielson, there would be enough time to purchase the appropriate book at the midpoint in their travel.

5. John Miller (JM)

JM-1 (also NPCA) wonders if there would be enough rest rooms at Eielson if additional tour buses use Eielson as a destination.

The number of restrooms designed in the Eielson project meets the code requirements.

6. Katherine Swift (KS)

KS-1 (also SD, NPCA) suggests that there are not enough toilets in the Toklat Rest Stop design during the Eielson construction years.

The current plan for the Toklat rest area is to have 3 double SST's (sweet smelling toilets) and to relocate the 10 existing chemical toilets. If this does not meet the need for visitors, additional chemical toilets could be added.

7. Sue Deyoe (SD)

SD-1 suggests that placing porta-potties at Stony and other sites would create less of a strain at the Toklat Rest Stop.

The DCP/EIS decided that there would be no additional facilities in the Stony area. The NPS believes that there will be enough capacity at Toklat and that facilities at Stony would detract from the wilderness character of the area.

SD-2 suggests that there is no need for a trail at the Toklat Rest Stop.

The trail was approved in the DCP/EIS as an appropriate recreational facility. Because of the durable gravel bench as the site, actual trail construction would be minimal and only as necessary to provide a compacted surface course to support ADA requirements.

SD-3 suggests that stricter limits on vehicle use during the Eielson construction could result in less visitor crowding and confusion.

Strict vehicle limits are in place already with the cap promulgated as a federal regulation in 2000. NPS expects that coordination between bus drivers and operational tweaking by NPS and the concessionaire will limit visitor jams at the facilities.

SD-4 suggests that the pre-1990 Toklat Rest Stop (east of the east Toklat Bridge) should be evaluated for some or all Toklat Rest Stop functions.

The NPS believes that a certain level of facility concentration enhances the wilderness character of the remaining road experience, and that one rest stop in the Toklat area is optimal.

SD-5 suggests that there may not be enough room designed into the Eielson parking lot.

The Eielson parking lot is designed to accommodate 9-10 buses with overflow parking available along the entry road and on the park road, above the parking lot.

SD-6 suggests that human-bear encounter management will be more difficult at the new Eielson than it is at the old Eielson.

NPS has given much thought to the protection of visitors when bears approach the visitor center and expects that some details of operational response will evolve as different situations arise. Then, as now, park staff and bus drivers will need to be vigilant when wild life is in the area in maintaining visitor and wildlife protection.

SD-7 wonders if the new Eielson has been designed to withstand expected earthquakes.

Eielson meets all building requirements under code, including seismic requirements.

SD-8 wonders if the communications antennas have been designed into the new Eielson.

Radio antennas will be reduced in size and will be located near the mechanical building.

SD-9 suggests that there are no bicycle racks shown for the new Eielson.

Bicycle racks will be located to the right of the entrance of the upper viewing deck (roof).

SD-10 wonders what the plan is for the cliff swallows that nest under the eaves of part of the existing Eielson.

After Eielson is demolished there would be no opportunity for cliff swallow nesting at the site for two summers. The new Eielson will have many overhanging eaves and NPS expects that cliff swallows will eventually return.

SD-11 wonders if there is a first aid station built into the Eielson design.

A first aid room is part of the design.

9. National Parks Conservation Association (NPCA)

NPCA-1 wonders if there are additional trails proposed for the Eielson area.

NPS is re-drafting the Backcountry Management Plan/Environmental Impact Statement, but trails identified in the preferred alternative in the 2003 Draft included a trail from Eielson to Gorge Creek and one from the end of the Eielson Bluffs down to the Thorofare gravel bar. Both of these proposed trails exist today as social trails and have resource protection issues.

10.State of Alaska (SOA)

SOA-1 suggests that covered outdoor pavilions at both Eielson and Toklat would allow visitors to experience the outdoors within the park on rainy days.

NPS explored covered pavilion space in the early stages of design and found that such areas were in conflict with the design intent of minimizing the visual impact of the new facility on the landscape. We have tried to accommodate this need through the creation of a covered area adjacent to the structure at the lower plaza level where visitors could have an outdoor experience with good views in relative comfort even in inclement weather. (see also NAEC-11)

SOA-2 asks whether State Department of Environmental Conservation permits will be necessary for the Eielson water system changes, the Eielson leachfield installation, and the Toklat vault toilet installation.

DEC will be consulted and all permits for the three installations that are necessary under the Clean Water Act authority of the EPA as delegated to the State DEC will be pursued.