

April 13, 2009

Dear Superintendent Anderson

On behalf of the Board and members of the Denali Citizens Council, thank you for the opportunity to comment on the EA for a plan to replace chemical toilets within Denali National Park. DCC has a long standing interest in park infrastructure planning. Many of our members live or work in the area and have accumulated years of experience using the Denali Park road as drivers, employees and recreation users.

### **Planning History**

We note that the proposed projects are located within a Wilderness exclusion zone that includes the Denali Park Road, a corridor 150' to either side of centerline of the road, and certain pre-determined development zones described in the Entrance Area and Road Corridor EIS of 1997. This plan (sometimes called the Frontcountry Plan) is the direct precursor for the EA under consideration and should provide general guidelines for the activities carried out by this EA. The Record of Decision for the Frontcountry EIS, February 1997, specifically states, "*Frontcountry developments will be limited to actions in which the National Park service has traditionally specialized, such as interpretive centers, environmental education opportunities, trails, resource protection programs and campgrounds... The National Park Service will encourage the private sector to develop visitor service facilities (accommodations, food service, and other commercial services) outside the park.*" (ROD, page 2) While nothing in the current EA contradicts this intent language, we at DCC hope that whenever a new or changed frontcountry infrastructure project is conceived at Denali, the NPS will mention this intent and submit the project to analysis of its consistency with this specific intent language.

### **Enabling legislation**

We encourage NPS to include a more detailed presentation of ANILCA purposes when describing "Park Purpose and Significance" on page 9 of the EA. The 1917 enabling legislation receives greater attention here by being quoted in a separate italics block. A similar emphasis of ANILCA purposes would serve to remind the reader that ANILCA provided significant new detail on park purpose (see page 7 of the Draft Entrance Area and Road Corridor EIS).

### **Purpose and Need for this action**

We are aware that there is a sense of urgency behind the proposed changes described in this EA, in that the State of Alaska Department of Environmental Conservation has issued a Compliance Order to ameliorate problems with the Wastewater Treatment Facility. Given the data presented in this EA, it would appear that eliminating the large amount of effluent generated by chemical toilets is the only solution to the problem. We are supportive of this concept.

However, the NPS did not present a case **for** SSTs as the preferred alternative to chemical toilets or water based systems. SSTs may have been vetted in the past, but we would like to see information in this EA on how the selection of SSTs was developed, their advantages, and also their problems (especially with proper venting of odorous gases), based on their history of use at Denali.

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DCC Board

Nancy Bale  
Anne Beaulaurier  
Jean Balay  
Cass Ray

Jenna Hamm  
Joan Frankevich  
Nan Eagleson  
Jared Zimmerman

Julia Potter, Community Organizer

## ALTERNATIVES

### Requests common to all alternatives

1. **Viewshed:** We would have liked this EA to show architectural drawings of how the new toilet structures would look when viewed from the ground by a standing onlooker. This would enable the public to get an idea of the height of the proposed SST structures and how this compares with existing sight lines and viewsheds. Such views will provide the public with better information on the viewshed impacts of these new structures. In particular, we wonder if the proposed Polychrome structures will appear taller, given the fact that the tanks would not be buried.
2. **Noise Mitigation during construction:** We agree that noise and dust mitigation must occur, and thank you for mitigations such as visual blocking, working at night, and using noise reducing add-ons for equipment. Backup alarms, although necessary for safety, are particularly invasive and bothersome and we urge you to find the quietest way to use this safety feature effectively.
3. **Changes to bus scheduling:** Given the fact that Polychrome stay times could significantly change after the facilities are removed, the EA needs to address its impact on bus scheduling (and visitor experience) in greater detail.

## INDIVIDUAL ALTERNATIVES

### Teklanika Campground Alternative 2 (NPS Preferred Alternative)

We support this alternative.

### Teklanika Rest Stop Alternative 3 (NPS Preferred Alternative)

We support this alternative, but would like NPS to provide details on the change in the overall site footprint of this alternative, as it is larger than the existing one. **Noise mitigation:** We request that NPS, in the Final EA, provide more detail on how much the generator will have to operate at Teklanika (for the fans), and what steps will be taken to shield its noise. **Number of toilets:** We urge NPS to consider the need for as many toilets at Teklanika as have been there in the past. With Polychrome closed, guests will be urged to make full use of Teklanika, likely creating greater demand there. The same may come to be true at Toklat, eventually.

### Polychrome Rest Stop Alternative 2 (No toilet facilities)

We support this alternative, which is not the NPS Preferred Alternative.

We support this alternative because it would allow for a quiet, simple rest area where the view is dominant. We note that the distance between Teklanika and Toklat is only about 25 miles, shorter than the distance between headquarters and Teklanika. There may be few complaints from visitors about the distance between toilets if this alternative is adopted.

However, it is our conclusion that since the Frontcountry EIS has defined this area as a **Rest Area** (see map on page 5 of the EIS), toilet facilities COULD at some point be replaced there, if public need warranted. At that time, given knowledge gained over years, a new design or configuration would likely be appropriate, changing the planning and preparation of the NPS Preferred Alternative. NPS need not take the time, money and energy to develop an architectural design now.

**Polychrome Rest Stop Alternative 2 (No facilities)**

We ask that if NPS picks this alternative, you provide more detail on how you will deal with bus parking, given the fact that there will be a much larger open area at Polychrome. We urge NPS to re-vegetate as much as possible of the footprint now covered with facilities. Another possible action could be redirecting the road further north to provide more space for visitors on the “view side” of the road. Although NPS may be tempted to provide more opportunities for bus parking after facilities are gone, we urge you to consider logistics and not create a situation where many buses are using the open area for parking, creating problems of egress, ingress and safety.

**NOTE:** We have heard for months, even before the issuance of this EA, that Polychrome Rest Stop facilities would be dismantled this coming summer. It seems almost an afterthought to write an EA/FONSI for this action, as there is really no alternative but to remove the chemical toilets. The holding of public process on this particular decision would appear to be somewhat useless, even disingenuous. Was there another way to structure this EA so that the “NO ACTION” alternative on the Polychrome Rest Stop facilities would not be available?

**Toklat Rest Stop Alternative 2 (NPS Preferred Alternative)**

We support this alternative. We have heard from at least one user that SSTs become quite odorous by August. Are there mitigations for this condition?

Again, thank you for the opportunity to comment. Feel free to be in touch with me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Nancy Bale". The signature is written in a cursive, flowing style.

Nancy Bale, President DCC  
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