

May 21, 2004

Dear Superintendent Anderson,

On behalf of the board and membership of Denali Citizens Council, I would like to thank you for the opportunity to comment on the EA for Construction of a new Eielson Visitor Center and a permanent rest stop at Toklat. We have reviewed the EA and pertinent sections of the Frontcountry DCP/EIS of 1997. We find that the EA is incomplete as currently formulated and without more thorough analysis could lead to unintended impairment of park resources and values. Our concerns and suggestions appear below:

General Considerations

- The NPS Organic Act provide a double mandate to the National Park Service “to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” (16 U.S.C 1.) Actions implementing the Frontcountry EIS, of which this is one, emphasize the *visitor enjoyment* element of that mandate. While we support activities that provide for the enjoyment and education of park visitors, this is only part of the NPS mandate. We are concerned that access and interpretation are overtaking wilderness preservation at Denali National Park and Preserve. For example NPS is currently constructing major facilities at the east end of the park, NPS is scoping for a major interpretive project south of the park, and NPS is writing a backcountry plan that may admit off road motorized activities in areas of the park suitable for wilderness designations. At the same time, to cite one example, wilderness identification and designation in the Denali park additions is languishing. We realize that the frontcountry is not Wilderness and that the activities described in this EA will not be occurring in formally designated Wilderness. However, impacts to the wilderness character of the park **will occur** as the result of enlarging Eielson Visitor Center (EVC), and must be more thoroughly addressed in the EA. We understand that numerous safeguards to protect the environment and to provide for more appropriate aesthetics at EVC have been incorporated into the EA. Nevertheless our concerns are genuine about this visitor center’s cumulative impact on the park, as currently configured as a major visitor destination with increased retail sales, educational services and associated trails.
- Members of Denali Citizens Council who drive tour and shuttle into the park have told me that the primary interpretive experience along the park road is the face-to-face confrontation with a wilderness park. We urge you to keep this in mind when designing waysides and rest stops west of the park entrance, and even more so west of MP 30. An enlarged Eielson will be a “destination site” deep in the heart of Denali. Although we support maintaining some interpretive exhibits and amenities at Eielson, they are of secondary importance to the visitor center’s function as a comfort station, shelter and comfortable viewing platform. The nature of this in-park experience is the feel of the air, the sounds of birds, wind and water, the silencing of conversation in the face of wilderness terrain extending out from the place where one stands, the opportunity to observe what is going on firsthand. The proposed world class destination at Eielson, however well intended, could create unintended consequences for this wilderness experience along the park road, and in designated Wilderness nearby.

DCC Board and Staff

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I. PURPOSE AND NEED

A. Authorization – Front Country EIS of 1997.

- The Frontcountry EIS, which provides the authority for actions taken under this EA, received comments from 262 individuals and agencies and testimony by 40 individuals. Although after reviewing the comments NPS selected Alternative D, significant public comment favored principles of Alternative C, a less development-oriented alternative. To suggest that the public *overwhelmingly supported* expanding Eielson Visitor Center into the facility represented in this EA does not reflect the reality of public comment.
- Departures from the development concepts of the Frontcountry EIS have already occurred (for example, retaining the park airstrip and retaining toilets at Primrose). Although changes may be inevitable, they require close scrutiny in order to avoid an unacceptable drift away from the appropriate balance between visitor accommodation and resource protection. This EA represents a departure from the direction of the Frontcountry EIS, we feel, by mandating greater increases in size and type of facilities than we consider appropriate.
- The Frontcountry EIS directed the NPS to assess the impacts of changes mandated in the plan by performing a VERP (Visitor Experience Resource Protection) process, to identify trends that may be affecting the carrying capacity of the park. We have heard very little about how VERP has been used to assist NPS in determining what scope and size of facilities are needed. We understand that it is to be a continuing process during the life of the EIS, and will assist the park in implementing appropriate facilities in the Plan.
- An EA acts as a decision document and as such, should provide a range of alternatives. As regards the Eielson Visitor Center, no alternative to the one action alternative has been provided. Instead, the decision as to size and space allocation of this facility has been made through a briefly-described in house process (pp. 16, 23, EA). We need more information on how NPS came to this decision.

B. Structural and Size Requirements

- ***Eielson:*** *The EA states (p. 3) that Eielson gets “extremely crowded” each time two or more buses arrive, that it is “undersized,” has structural problems and needs more “protected space” during inclement weather. On page 4, the EA states that there are over 1000 visits to this site daily. The EA recommends a size increase from 3700 square feet to 9000 square feet to accommodate this level of visitation or perhaps a small increase in the number of tour buses. In addition, the EA states that the leach field will reach its functional lifetime in 2005 and will be replaced as part of the project.*

We agree that Eielson is too crowded, has structural and aesthetic problems and should be rehabilitated or replaced. The earth berm design in the proposed alternative is elegantly simple and incorporates many features that we accept and admire. However, we question its overall size and the allocation of additional space for maintenance activities, exhibits and retail sales.

The Frontcountry EIS stated that Eielson VC “*would be replaced with a facility of appropriate size and function*” (p. 67, Draft). The increase advocated by this EA would be more than double the size of the current facility. The size of EVC in this EA requires justification through objective data and analysis. We calculated through rough measurement

of the map in the EA that the indoor public viewing area encompasses approximately 2700 square feet, enough room for perhaps 200 people (?). The EA should explain the allocation of this much space.

The Frontcountry EIS authorized use of alternative energy sources for Eielson “*if feasible*” (p. 109, Draft). We understand that these projects are still under study for their feasibility and impacts. We encourage NPS to carefully assess their impacts before embarking on technologies that, although proven in many settings, will be experimental in this area, an area with strong resource values for both viewshed and soundscape.

- ***Toklat:*** *The Frontcountry EIS authorized building a rest area at Toklat that would incorporate “interpretive exhibits, a shelter, a comfort station and a short (1/4-1/2 mile) loop trail” (p.110).*

This EA also authorizes permanent hard-sided facilities for bus dispatch and a visitor contact station and ranger housing. This EA must justify the need for facilities above and beyond those indicated in the EIS. We feel that an enclosed visitor contact station is not necessary at Toklat and that instead the effort should center on providing adequate shelter for the viewing area and comfort station, adequate numbers of toilets, and perhaps a kiosk or outdoor interpretive sign as interpretation. A ranger could provide intermittent interpretive lectures, similarly to what is currently done at Teklanika rest stop.

In the Frontcountry EIS, the Toklat Rest Stop was a Priority One Action, while Eielson replacement was Priority Two. The EA should state why these priorities appear to have been changed, and why it is necessary to construct a temporary facility at Toklat, only completing it after Eielson is finished. It would appear to be more cost effective to complete the permanent Toklat facility first, and would in the long run increase visitor satisfaction.

C. Impact Topics

We suggest broadening two existing impact topics for both Eielson and Toklat as follows:

- **Wildlife Values and Habitat**
Enlarge the impact analysis to include cumulative impacts on wildlife habitat beyond the road corridor through construction of trails at Eielson and Toklat.

Enlarge the impact analysis to include cumulative impacts on wildlife associated with increased use of segments of the park road between Stony and Eielson and between Eielson and Wonder Lake that could result from creating a world class visitor destination at Eielson. In addition, off trail wandering at Eielson, because vegetation there is low, will require regular monitoring or impacts to vegetation will remain a problem.

- **Local Communities and Socioeconomic Resources**

Altered length of stay for park visitors could result in special marketing activities associated with tours to Eielson and Wonder Lake. The cumulative impacts of these increases on park road traffic require analysis.

We suggest two additional impact topics.

- **Road character**

The 1994 Road System Evaluation states the management objective for the park road, as follows: “Provide...efficient public transportation...which enables visitors to use and enjoy park resources in the safest and freest possible manner compatible with protection of park resources (p. 2).”

In addition, this document describes Denali’s unique “road character” beyond MP 30 as a road that winds a sinuous path over dramatic terrain, conforms to topography, is variable in width and grade, has engineered structures only when necessary to protect the resource, is gravel surfaces and has minimal signage (p. 3).

The EA should describe the impacts that might occur to the road character as a result of any of the action alternatives. Because of increased use of the road, perhaps larger, heavier buses, and possible tighter schedules, the maintenance of a primitive road will be less easy to justify.

- **Wilderness resource values**

Although the EA considered and rejected the impact of these projects on wilderness resource values, we feel that cumulative impacts of activities carried on within the wilderness exclusion, or road corridor, will be felt in the designated Wilderness areas adjacent to that road corridor.

Because of more traffic and increased visitation, and new trails construction, especially at Eielson, impacts Wilderness areas outside the road corridor will occur, and should be addressed in the EA. Even within the road corridor, there are wilderness resource values to be considered.

Although alternative energy projects and a propane generator could decrease noise impacts at Eielson, the hydro and possible wind projects will generate noise. The tundra around Eielson visitor center is known for its natural sounds, including multiple small bird species. These contribute to the sense of wilderness, along with the huge vistas and feeling of solitude not far from the road. Impacts to these values by action alternatives must be included in the EA.

II. ALTERNATIVES and THEIR CONSEQUENCES

A. Toklat Rest Stop

Both action alternatives involve similar designs for the Toklat rest stop. The main difference between the two Toklat action alternatives is site placement, the NPS preferred alternative being 600 ft downstream from the Toklat Bridge, the other action alternative being closer to the existing site, at a point 200 ft. downstream from the Toklat Bridge.

After reviewing the descriptions and impacts for the Toklat Project, we support Alternative 3 for Toklat, the upstream site. After reviewing impact analysis, we feel that this site carries out the intent of the Frontcountry EIS with minimal impact to habitat and maximum opportunity for visitor safety. We urge the National Park Service to complete this entire project before commencing the Eielson project. To this end we suggest that you finalize the EA for Toklat only, and publish a new EA for Eielson that addresses the points we have brought up in this letter.

Our support for Alternative 3 for Toklat is based on the following considerations:

- **Impacts to Habitat** Alternative 3 would involve the least disruption of new habitat in its construction, up to 2.75 acres as opposed to 4.55 acres.
- **Visitor experience and safety** The large drop off that would occur at the rest stop in the NPS preferred alternative as the result of sheet pile installation, would not be a factor at this site. From the standpoint of erosion, maintenance and visitor safety, there appears to be little reason to put the site further downstream. At the upstream site, the EA states visitors have enjoyed access to a freshwater stream under the bridge. This would enhance their experience under this alternative.
- **Visual impacts** We appreciate the NPS concern for visual impact in the placing of the preferred alternative rest stop. However, a well-designed rest stop need not be a visual impairment, just as Polychrome, which is visible, and Teklanika, which is visible from the road, are not. Therefore, we feel that the placement of the rest stop close to the road is not aesthetically problematic to the degree that would remove it from consideration.

B. Toklat Rest Stop – Our Recommendations

- **Complete the permanent Toklat rest stop before beginning Eielson Visitor Center.** Install the permanent allocation of SST toilets and complete all appropriate structures. This is as the Frontcountry EIS directed, and it is likely to be more cost effective in the long run than making a temporary facility now.
- **Reduce or eliminate berms, except for erosion control:** Eight foot berms create numerous problems, such as limiting the viewshed, limiting ability to detect approaching wildlife, especially bears, limiting ability of drivers to observe and supervise passengers,

restricting visitors to a small plaza that will not accommodate adequate visitor numbers based on current and projected use.

Berms may not really be necessary if the facilities are constructed with a low profile. After all, other facilities along the park road are visible from long distances, such as Polychrome and Teklanika. If the uphill berms are required to control drainage, they are necessary, but berms simply to reduce visual impact are not necessary, on our opinion. Wind shielding can be accomplished to a degree through placement of the toilet structures.

- **Reduce or eliminate hard-sided structures at Toklat except when used for wind reduction, necessary storage and housing the comfort stations**

The Frontcountry EIS did not authorize bus dispatch, a visitor contact station, or hard sided ranger quarters at Toklat Rest Stop. Are these structures necessary in the long term? If any of these are necessary during Eielson construction, let them be temporary, destined to be removed. Toklat is supposed to be a rest stop, as comfortable as it can be, but not a visitor center. Covered toilets and an ADA-accessible observation area will go a long way toward meeting the requirements of the Frontcountry EIS, while making the face-to-face park experience primary. Interpretation by park rangers as it occurs at Teklanika would be another way to provide education without permanent structures. Outdoor kiosks, one or two, could provide salient information on the immediate area.

II. ALTERNATIVES AND THEIR CONSEQUENCES

C. Eielson

There is only one action alternative in this EA for construction of an Eielson Visitor Center. We feel that the EA will be incomplete until a smaller alternative has been presented, one that will be cost effective, and will meet visitor needs for shelter and comfort.

Shelter and provision for toilets are the primary functions of a visitor center deep in the heart of a wilderness park. Secondary functions of a visitor center, including exhibits, interpretation and retail sales, must be reviewed in light of cumulative impacts to soundscape, visitor experience, road character, wilderness values and wildlife.

Because the design is less obtrusive, easier to heat, and more efficient at dealing with the primary functions of shelter and comfort, we support the earth berm design. The observation deck on the roof is a great improvement on the current situation. However, we recommend a smaller increase total size that will continue to serve park purposes.

The Eielson Visitor Center EA does not fully explore cumulative impacts of the proposed Eielson Visitor Center, as designed and envisioned, upon bus traffic along the park road, and thereby on visitor satisfaction. Although the EA discusses the number of underserved visitors reaching Eielson, it does not provide complete data to show the current use profile for both Toilet and Eielson, nor does it project a use profile for the next 20 years or so. The EVC is expected to serve the park visitor for the foreseeable future. What number of buses per hour or per day is

anticipated and factored into its design? What quantity of people will fit into the space provided? What additional number of Eielson tours might be offered by hotel tour companies? How many buses travel between Stony and Eielson on a typical busy summer day now? How many additional buses can be expected to travel between Stony and Wonder Lake? Does this project depend upon widening the road to Wonder Lake? What connection between this project and park road character standards will ultimately be drawn? What role will limits on daily visitation to Eielson play in the implementation of this EA? How will the park decide when to set limits?

D. Eielson Visitor Center – Our Recommendations

- **Issue an EA specific to the Eielson Project providing other Action Alternatives.**

We request that NPS reformulate this EA by separating the Toklat and Eielson projects into two EAs. The EA for Eielson would include another action alternative based on the earth berm design. This action alternative would reconsider the square footage needed to provide adequate shelter and comfort. This could be done by reducing the size of alcoves and recessed areas, reducing the displays, reconsidering retail sales and reconsidering space allocated to maintenance needs. For example, the mountain model could be made of material that would allow it to be placed outdoors, thereby freeing up space inside for shelter, the primary purpose and function for a new structure.

The alternatives should review the balance between covered outdoor space and enclosed indoor space. The alternatives should reconsider the space allocation to retail sales.

The alternatives should consider the \$7 million + price tag for Eielson. Is this a cost effective expenditure? Can an adequate facility be constructed for less? Will the existing proposal of approximately 9000 square feet end up costing more than anticipated?

The EA should provide the alternative of a smaller visitor center while still offering these basic needs: Safe bus parking, safe covered and uncovered observation areas, toilet facilities, camper storage, and ranger and bus quarters.

- **Protect the Denali Park road character, visitor experience and nearby wilderness resource values through traffic limits**

Although there is a limit on traffic set in regulation at 10,512 vehicles per summer season, a destination style visitor center at Eielson would lead to more crowding and reduced visitor satisfaction between Stony and Wonder Lake.

We are not opposed to bringing visitors to enjoy Eielson, but even maintaining the current levels of visitation at 1000-1200 a day may be difficult after a 7 million dollar destination has been placed in the heart of this wilderness park. The EA should state what ideal number of daily visits NPS is planning toward. We feel that the current level of visitation, even with more adequate space, is more than ample. Denali Citizens Council has always argued that what the park has to teach is better absorbed in an environment of limited access.

To that end, we urge you to review bus size and weight limits, and hourly and daily limits on the stretch of road between Stony and Wonder Lake most likely to be affected by this visitor center.

We understand that another business in Kantishna may be running day tours this year. Denali Citizens Council has argued in the past and we argue now that these day tours over-emphasize access through the park at the expense of park resources and visitor satisfaction, and that they are not an ANILCA access guarantee for Kantishna businesses.

- **Eielson needs adequate staffing with NPS personnel to provide interpretation, enforcement and mitigation and to ensure visitor safety.**

A larger visitor center would have more visitors for longer periods of time. Visitors would probably spend more time at the facility, and would base hiking activities radiating out from the facility.

A larger center should provide NPS rangers to support hikers and provide education on impact reduction and bear safety, rangers to monitor on-the-ground impacts and animal encounters. A large visitor center without National Park Rangers to provide education and mitigation can have cumulative negative impacts to park resources. We cannot in good conscience support large capital projects if the funding for ranger support staff is dwindling.

- **Perform baseline sound studies before construction begins and after new VC is in place.**

This information will assist NPS in determining the changes that will occur with new alternative energy plans. As part of these studies consider the energy demands of the proposed visitor center as compared to the existing facility and keep those demands as close as possible to those of the existing facility. This may require limiting electricity-based interpretive videos, for instance.

Alternative energy is laudable and was mandated in the Front country EIS. Is hydro being used elsewhere in the park? Is it effective for the job required? Noise quality for hikers south of the center will be impacted by the hydro plant. From the standpoint of energy efficiency, are battery banks and occasional generator operation effective, i.e. is the present system effective? Solar panels could be helpful, but the role and impacts of hydro should be reviewed.

- **Rangers and dispatchers need an observation post that is level with the parking lot** to provide surveillance for wildlife encounters and bus safety. Otherwise surveillance cameras would have to be used but would be less effective. The dispatch room should be placed so that it has visual contact with the buses and parking area. The break room could be combined with the dispatch center. The EA does not state how many bus drivers would be expected to be using the break room at any given time, nor does it state how dispatch is handled at the present time.
- **Emergency exit strategies from the “view side” of the building should be stipulated.** In case of a fire, people exiting from the indoor seating and viewing areas will egress onto a sloping hillside and will have to file eastward around the building to get to the ramp back up to the parking lot. The danger here is that there is a significant grade right off the edge of this building. How will fire exit plans deal with the possibility that in the rush to leave people will fall? Is escape from staff quarters safe and easy?
- **Relocate the lockers to a less high traffic area.** They could have outside access. The need for lockers requires re-assessment.
- **Parking lot exit lane needs to be designed to expedite left turn back onto park road if heading toward Kantishna.**
- **Provide safe and minimal-impact alternatives for bus turnarounds during interim construction.**
If the Eielson parking lot will be unavailable for turning buses around during the two year construction period, the park should develop, through consultation with bus drivers and transportation experts, a contingency plan identifying sites where buses can turn around safely and identifying sites that cannot be used for turning around. The EA should contain a plan for avoiding unacceptable impacts to the Stony parking area, in view of increased use it may receive from shuttle buses during this period.

We understand that NPS is planning to meet with Denali Park bus drivers to discuss their concerns on June 14th, 2004. We applaud this effort. Drivers have practical knowledge that will provide great assistance to you. Thank you again for the opportunity to comment. You may contact me at 907-277-3825 if you have questions.

Sincerely,



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