

184 | D-345

FINDING OF NO SIGNIFICANT IMPACT

**FOR THE CONSTRUCTION OF A NEW EIELSON VISITOR CENTER
AND A
PERMANENT TOKLAT REST STOP**

The National Park Service (NPS) has prepared an environmental assessment (EA) that evaluates replacing the Eielson Visitor Center (Eielson) and constructing a new Toklat Rest Stop along the park road in Denali National Park and Preserve (Denali) as authorized by the 1997 Record of Decision for the *Entrance Area and Road Corridor Development Concept Plan (DCP/EIS)*. Facility developments authorized by the 1997 Record of Decision are limited to actions in which the NPS has traditionally specialized, such as interpretive centers and other visitor facilities.

The NPS preferred alternative (Alternative 2) includes:

- Replacing the 3,700 square foot Eielson Visitor Center at Mile 66 of the park road, built in 1959, with a 9,000 square facility to be built on the same site during the summers of 2005 and 2006. The structure would be designed so that the main floor would be below ground level on the uphill side, with the parking lot at grade with a roof functioning as a picnic and observation area. The new building would continue the functions of the present building as a visitor contact center, interpretive program center, bus transit center, rest stop, picnic site, book store, maintenance facility, and seasonal housing. Access to the building would be by an ADA compliant outside ramp leading down from the parking lot to the restrooms and main entrance. Functional areas on the main floor closer to the building entrance would include an information counter, exhibit areas, book store, observation areas, picnic areas and staff office. Functional areas further away from the entrance would include most mechanical and maintenance areas, bus driver break room, and seasonal quarters.
- The existing parking lot would be enlarged to accommodate circulation room for nine permanent bus spaces arranged in echelon, and for ten private and administrative parking spaces. The existing septic system and leach field would be replaced. Existing trails would be re-connected to the new site facilities. Areas of alpine tundra to be disturbed by construction would be saved for use during site reclamation. Using hand tools, the existing wood spring box and galvanized pipe water line would be replaced at the same site with newer materials.
- Solar, hydro and wind alternative energy sources would be incorporated into the building and site design to almost eliminate dependence on a fossil fuel (propane) generator. Photo-voltaic panels would be attached to the outside of the building. A small 4'x4'x5' hydro power plant structure would be installed 300-400 feet below the park road near the stream that flows just east of Eielson. At some point in the future, one or two ten-meter towers to hold wind power generators could be erected 100-200 feet west of the visitor center.
- A permanent Rest Stop would be constructed at Toklat at mile 54 of the park road, 600 feet downstream of the west Toklat Bridge and 450 feet downstream of the present facility. The new facility at Toklat would include parking for 15 buses and 10 cars, three large vault toilets temporary installation of the chemical toilets used at the present Toklat Rest Stop, a 24'x24' visitor contact center with a staff office, and a 16'x 24' bus dispatch office. Gravel berms up to 8 feet in height would be constructed to reduce visibility of the facility from the park road and to

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help protect the facilities from stream course changes in the alluvial fan above the facility. Some functions at the site could be initially housed in weatherports or other similar soft-sided structures, but the new Toklat Rest Stop would be made a permanent facility with hard-sided structures replacing the temporary ones when additional funding becomes available.

- The existing service road would be re-routed above the new facility. The parts of the adjacent alluvial fan disturbed for gravel extraction in the late 1980s would be recontoured.
- A related proposal to construct bank stabilization of the Toklat River, using steel sheet pile or gabion walls, to protect the facilities between the west Toklat River bridge and the Toklat Road Camp would be completed. Protected breaks in the sheet pile would be installed every 300-400 feet to allow animal passage to and from the river floodplain.
- An ADA compliant trail would be defined from the parking lot and facilities to the edge of the river where it would continue along the top of the bank stabilization to the present rest stop.
- During the two summers of construction at Eielson, shuttle buses would stop at Toklat for the lunch and rest stop break, and would also drive to Stony for the mountain views and additional wildlife viewing. Shuttle buses would use the Little Stony pullout as a turn-around point and would stay longer on the edge of the park road at Stony for the views from that site.

Other Alternatives Considered in the EA

Two alternatives were evaluated in the EA, in addition to the NPS preferred alternative. Briefly, those alternatives were:

Alternative 1 (No Action Alternative): Under this alternative there would be continued use of the existing Eielson Visitor Center and temporary Toklat Rest Stop. A new leachfield would be constructed near the present site. Interpretive programs in the west end of the park would continue to be based out of Eielson. Approximately 50% of shuttle bus visitors would turn around after a break at Eielson, and visitors riding Wonder Lake buses would make two stops at Eielson. Electrical power would be generated for Eielson from a fossil fuel generator. There would continue to be an outdoor uncovered picnic area, and the 1976 addition would provide a limited outdoor covered picnic area. Annual maintenance to fix leaky roofs and differential subsidence between the two halves of the building would continue.

The temporary rest stop at Toklat would continue to serve as the site of a major turnaround point for the shuttle buses and as the primary turnaround point for the tour buses. Additional bank protection would not be installed at Toklat upstream of the present southern limit.

Alternative 3 - Replace Eielson Visitor Center on Site and Construct Toklat Rest Stop at Upstream Site:

The same proposal as in Alternative 2 for a new Eielson Visitor Center and for bank stabilization at Toklat would be part of the alternative.

A permanent Toklat Rest Stop would include the same facilities, with changes in gravel berms or layout to accommodate the slightly different topography, as in the preferred alternative, but the site would be 200 feet downstream of the west Toklat Bridge and would enlarge and cover the present facility site.

The existing service road would be partially re-routed through the previously disturbed area of the alluvial fan to end up above the new facility. The bank of the Toklat River in this area slopes gradually to the clearwater stream flowing under the west bridge.

Proposal Objectives

The primary objectives of the preferred alternative are to construct an appropriate facility to enhance the use of the Eielson site for on-site park resource interpretation, as a bus passenger rest stop and as a bus turnaround and transfer station. The present facility is undersized, the two halves of the building settle differentially, there are not enough toilets for the pulse visitation, there is not any protected space for cating during inclement weather, there is not enough exhibit space, there is no real office space, and the downstairs areas are not accessible. The facility should incorporate alternative energy systems to eliminate as much as possible the use of a diesel generator.

The functions performed at the Eielson Visitor Center would need to be continued during the construction period, and the proposal includes constructing improved facilities near the present Toklat Rest Stop at Mile 54 to serve during the construction seasons at the new visitor center. The new Toklat Rest Stop would be made a permanent facility when additional funding becomes available. Gravel berms to protect the facility from flooding and to provide some visual screening would be part of the design. A temporary turn-around site east of Eielson and revised shuttle bus schedules would be needed during the construction period. A related proposal to construct bank stabilization of the Toklat River to protect the visitor and administrative facilities downstream of the west Toklat River bridge would be completed. A trail would be constructed from the rest stop southward along the river edge to connect to the Clearwater stream under the west Toklat bridge.

Both action alternatives are considered to be the **Environmentally Preferred Alternative** because: the installation of alternative energy sources at Eielson would greatly reduce the dependence on fossil fuels; the replacement of Eielson with a structure that blends better with the landscape would reduce existing visual impacts; enhanced interpretive displays would allow visitors to become better educated about park resource values which would enable them to be better land stewards; the installation of bank stabilization at Toklat would allow necessary park support development to concentrate at Toklat rather than need to find new areas to develop along the west end of the park road; the replacement of Eielson with an ADA facility would broaden the population that could enjoy the interpretive opportunities or who could work at the site.

Public Involvement

Public review of the EA was conducted from April 9, 2004 to May 9, 2004, and a requested comment extension was granted until May 21, 2004. Ten comment letters were received on the EA. Five commentators supported Alternative #3, two supported Alternative #2, and three did not express a preference. Those commentators that supported the Toklat Rest Stop proposal in Alternative #3 cited less disruption of new habitat, a safer site for visitors by not perching the rest stop next to a steep drop at the proposed sheet pile, continued access to the freshwater stream that flows under the west Toklat bridge, less of an appearance of facility sprawl, and less hazard from alluvial fan flooding. The commentators that supported the a downstream Toklat Rest Stop in Alternative #2 cited less visual intrusion at the new Rest Stop site.

The responsive comments that have not led to changes in the proposal are discussed in an **Errata Document**, which is attached to this decision. Comments that have led to refinements in the proposal or additional mitigation are addressed here:

The Northern Alaska Environmental Center (NAEC) and most other commentors felt that the gravel berms proposed for the Toklat Rest Stop were not justified in terms of hiding the facility from the park road, would obscure the view of the landscape and of approaching bears for people at the rest stop, would make it difficult for bus drivers to keep track of their passengers, would become an unsafe playground for children, and may contribute particulate matter to the wind. NPS accepts the public recommendations for removing the berms around the parking and visitor facilities at Toklat. The berm designed for west of the road will be built to help protect the site from floods.

The State of Alaska and other commentors requested that permanent facilities at Toklat, aside from toilets, should be roofed but otherwise open to the elements. NPS agrees that, unlike the temporary facilities necessary to replace the Eielson functions during visitor center construction, the permanent facilities at the Toklat Rest Stop will not include a bus dispatch office, interpretation office or structure for book sales. The permanent Toklat Rest Stop will be designed along the lines of the protected space at the Teklanika and Polychrome Rest Stops and will 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.

Two commentors suggested changes to the layout for the bus parking scheme at Toklat. NPS agrees and will coordinate with the concessionaire on the operational requirements for separating the tours and shuttle bus system. The parking area at the Toklat Rest Stop is designed to accommodate a maximum number of buses during the construction period and may be reduced (parking spots eliminated) once the new Eielson is complete.

Two commentors requested improved monitoring and mitigation measures to support wildlife movement across the bank stabilization on the Toklat River. Monitoring will initially consist of gathering informal observations from park staff, bus drivers and visitors. Initial mitigation will include burying as much length of the stabilization as possible and putting in wall breaks every 300-400 feet. Large rip rap, which may be used on the river side of the sheet pile to slow the river's flow, would also provide stepping stones down to the floodplain.

Two commentors stated that the proposed sheet pile at Toklat would be a huge visual intrusion. NPS recognizes that the proposed sheet pile at Toklat will be a moderate visual intrusion, adding to the man-made structures at Toklat which currently includes both concrete bridges, the causeway between the bridges, the soon-to-be reclaimed extraction and processing site on the alluvial fan, and the Road Camp and gravel processing site ½ mile downstream of the park road. Given that the Toklat River is aggrading, it is likely that less of the sheet pile will be exposed as time goes on, similar to what we see now with regard to the sheetpile just east of the east Toklat bridge. The NPS will place rip-rap at the base of the sheet pile to break up the visual intrusion as well as to slow down the river and potentially increase gravel deposition. The NPS will consult with the Corps of Engineers and other agencies as to other visual resource mitigation possibilities.

The NAEC suggested that the turnaround for the Shuttle buses during the two summers of construction at Eielson be moved to a grader pullout near the top of Thorofare Pass rather than at the Little Stony grader pullout. This would allow the visitors to go two miles further into high quality grizzly bear country and

get a better view of Denali. NPS agrees to investigate the use of other pullouts beyond Little Stony, with the considerations of passenger safety and additional wildlife viewing in mind.

Mitigation and Monitoring

The mitigation and monitoring measures listed in the EA as part of the action alternatives and assumed in the analysis of effects will be implemented as part of this decision. Additional mitigation identified during the public comment period has been incorporated into this section:

Vegetation and Soils- Silt fences and straw bales or other Best Management Practices (BMP) barriers will be placed around the Eielson work area to limit erosion and other direct impacts to vegetation and soils. Landscaping and replanting native vegetation will occur around the new development area. Replanting with native vegetation will replace portions of the habitat lost from the construction operations. Periodic surveys will be conducted to determine the presence of exotic plants. Actions to replace the spring box and water line will be accomplished using hand tools.

Wetlands - Silt fences and straw bales will protect meadows and riparian zones in the areas not directly affected by construction. If collection boxes are used for the hydro plant at Eielson, and in order to keep the riparian zone soils in the streambed east of Eielson at least damp, the boxes will be closed when dry conditions reduce the stream discharge to less than one and one-half times the pipe discharge.

Wildlife Values and Habitat - The NPS and contractors will follow established guidelines in the park's bear-human conflict management plan. The plan requires operators to use bear-proof containers for food and refuse and sets up guidelines for temporary closures. Vehicle and animal access breaks are designed every 300-400 feet into the bank stabilization. Staff will monitor the sheetpile at Toklat to see if additional mitigation measures are needed to support wildlife movement from the floodplain to the uplands.

Water Resources - Water drainages will be avoided to the extent possible in the design of the new facilities.

Floodplains - Design for the proposed bank stabilization will include constructed "roughness" to prevent the river from speeding up as it courses next to the sheetpile. Fuel spill kits will be carried with heavy equipment when the vehicles are being used in floodplains.

Air Quality - Contractors will be required to use BMP, such as to control vehicle and equipment pollution. Equipment not in use will be turned off.

Sound Quality - Contractors will be required to use BMP equipment, such as mufflers to control vehicle and equipment noise.

Cultural Resources - Additional archeological investigations at Eielson and Toklat will be carried out in the summer of 2004. If previously unknown cultural resources are located during construction, the project will be halted in the discovery area until cultural resource staff could determine the significance of the finding.

Visual Resources - Minimal antenna height will be permitted above the roof line of the new Eielson Visitor Center. The NPS will place rip-rap at the base of the Toklat sheet pile to break up the visual intrusion as well as to slow down the river and potentially increase gravel deposition. The NPS will

consult with the Corps of Engineers and other agencies as to other visual resource mitigation possibilities.

Visitor Use and Recreation - Construction phasing will be coordinated with the park bus systems to minimize traffic delays on the park road. Visitor impact is expected, so an educational program with information and interpretive signs will be implemented. Barricades will be placed around the construction sites to prevent visitor entry, although some rest room facilities at the Eielson site may continue to be open to the public. NPS will investigate the use of other turnaround pullouts beyond Little Stony for the shuttle buses, with the considerations of passenger safety and additional wildlife viewing in mind. The permanent Toklat Rest Stop will 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.

Safety - Visitors will generally not be allowed within the Eielson or Toklat construction limits without permission from the park superintendent or delegate. If a gravel berm is constructed uphill of the service road at Toklat, it will have a gabion core to ensure that any flood in the alluvial fan will be diverted away from the rest stop facility. NPS will coordinate with the concessionaire on the operational requirements for separating the tours and shuttle buses at the Rest Stop parking lot.

Environmental Consequences of the NPS Preferred Alternative

The NPS has determined that the preferred alternative can be implemented with no significant adverse effect to the natural or cultural resources as documented by the EA and briefly summarized below.

- The loss of 1.3 acres of alpine tundra and soil at Eielson and the loss of 3.25 acres of thinly vegetated alluvial fan at Toklat will be a minor impact to vegetation resources. The vegetation communities are locally and regionally common along the west end of the park road.

About 0.5 acres of former alpine tundra will be restored at the present Eielson leach field by using tundra saved during construction. An additional 4.65 acres will be re-contoured and then re-seeded with native legumes at Toklat disturbed sites.

- Disturbance to less than 0.01 acres of riparian zone wetlands disturbed at Eielson and Toklat will have a negligible effect on wetland resources common near Eielson and Toklat.
- Wildlife habitat for small mammals, birds and large mammals will be reduced by 1.3 acres at Eielson and by 3.25 acres at Toklat. This is close to the 4.4 acres of disturbance estimated in the DCP/EIS and will have a minor effect. Existing use of these sites by large mammals such as grizzly bears, caribou and wolves is limited due to ongoing use of the facilities by people and vehicles.

Much of the new sheetpile will make it more difficult for caribou and other animals to move from the Toklat floodplain to the adjacent uplands. Vehicle access breaks are designed every 300-400 feet into the bank stabilization. This localized and minor impact to wildlife movement will be monitored and mitigation will be evaluated should any incidents or continuing impacts be identified.

- Use of alternative energy sources will reduce the need for and emissions from the present diesel generator from 12 out of 48 hours to an average of 4 out of 48 hours and have a beneficial effect.

- Effects from surface water runoff, such as erosion, will be controlled by silt fencing and other best management practices during construction and will be negligible.
- The new Rest Stop at Toklat will include constructed protection from natural flooding for a small part of the alluvial fan . The proposed sheet pile at Toklat will preserve the status quo with regard to upland versus floodplain acreage. These facilities will have a negligible to minor effect on floodplain resources.
- Local sound quality will be temporarily reduced by the use of heavy machinery. The use of alternative energy sources will reduce the noise from the generator. The hydro plant noise will be contained in the small valley, and will be minimized by the use of BMP sound-proofing. A minor benefit to the sound environment is expected after the project is completed.
- No cultural resources are expected to be adversely affected by this project.
- The new Eielson will be less visible from a distance because the single floor will be set into the ground. Moderate temporary visual impacts will occur during construction of the new visitor center, but long-term impacts to visual resources will be minor. Long-term impacts at Toklat to visual resources will be minor or possibly beneficial because the Toklat Rest Stop will be further away from the park road than at present and partially shielded from the park road. The elimination of remnants of the alluvial fan extraction site will also help by cleaning up unnecessary impacts to the natural landscape.
- Recreational opportunities for shuttle bus riders will be adversely affected for two years by the construction of the new visitor center and by the shortening of the bus trip to Stony at mile 62 instead of Eielson at Mile 66. This will have a moderate impact on the quality of the visit. Noise and visual impacts in the construction areas will temporarily inconvenience park visitors.
- The expanded and improved interpretive exhibits and opportunities at the new Eielson Visitor Center will benefit all visitors who stop there.
- The replacement and expansion of the Eielson Visitor Center will create a facility that will blend in with the landscape, be easier to maintain, easier to set up for interpretive displays, meet sustainability goals, and will be ADA compliant. Also, the facilities will help the NPS meet future demands should the tour bus system offer a tour that includes Eielson.
- A permanent rest stop at Toklat will improve the visitor experience over the chemical toilets presently in place and will provide opportunities for interpretive education and an exciting perch over the main stem of the Toklat River.
- The new facilities at Toklat will meet many park management goals, including a safe and protected place for a visitor rest stop, elimination of the use of chemical toilets there, providing bank stabilization to connect with existing sheet pile to protect all of the facilities between the Toklat bridge and the Toklat Road Camp. The rehabilitation of the alluvial fan gravel extraction area will allow natural recovery of the area.
- If the new structure provides a memorable interpretive experience, more visitors might come and stay in the local area in preparation for an all-day trip to Eielson, which will be a moderate beneficial effect on the local hotels and other businesses.

Rationale for the Decision

The NPS preferred alternative is chosen because it best meets the visitor experience objectives and does so with similar impacts to park resources as the other action alternatives. Additional mitigation based on public comment, as indicated in the public involvement and mitigation sections above, are incorporated into the plan.

In response to public comment, three refinements to the preferred alternative with negligible impacts are also incorporated into the plan. The permanent facilities at the Toklat Rest Stop after the new Eielson is opened will not include a bus dispatch office, interpretation office and structure for book sales. The permanent Toklat Rest Stop will 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. Gravel berms have been removed from the Toklat Rest Stop design except for the berm upstream of the service road designed to protect the site from flooding. The use of other turnaround pullouts for shuttle bus use beyond Little Stony will be investigated, with the considerations of passenger safety and additional wildlife viewing in mind.

Even though the No-action alternative does not disturb new habitat, it would not meet any of the stated objectives. The primary objectives are to construct an appropriate facility to enhance the use of the Eielson site for on-site park resource interpretation, as a bus passenger rest stop and as a bus turnaround and transfer station. Other objectives are to continue the functions performed at Eielson during the construction period, to construct improved facilities near the present Toklat Rest Stop at Mile 54, and to construct bank stabilization of the Toklat River to protect the visitor and administrative facilities downstream of the west Toklat River bridge. The site for the Toklat Rest Stop in Alternative 3 - the only difference between that and the preferred alternative - would have additional adverse effects from being more visible from the eastern approach along the park road, would be further from potential utility connections at the Road Camp, and would not have as wide a downstream view.

This preferred alternative is consistent with the 1986 Park General Management Plan, the direction in the 1997 Entrance Area and Road Corridor Development Concept Plan/Environmental Impact Statement, and National Park Service Management Policies.

All environmental impacts will be minor to moderate at most and, therefore, will not result in an impairment of resources or values of Denali National Park and Preserve and will not violate the NPS Organic Act.

The preferred alternative complies with the Endangered Species Act, the National Historic Preservation Act, the Clean Water Act, and Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands). There will be no significant restriction of subsistence activities as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 810(a) Summary Evaluation and Findings.

I find that the proposed action does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and the regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared.

Recommended: Paul R. Anderson
Superintendent, Denali National Park and Preserve

6/21/04
Date

Approved: Ralph H. Ungay
acting Regional Director, Alaska Region

6/22/04
Date

SENT BY:NPS

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National Parks:#11

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 at 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.