

# STATE OF ALASKA

## ANILCA IMPLEMENTATION PROGRAM

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June 10, 2004

Mr. Paul Anderson  
Superintendent  
Denali National Park and Preserve  
P.O. Box 9  
Denali Park, Alaska 99755

Dear Mr. Anderson:

The State of Alaska reviewed the April 2004 Environmental Assessment for construction of a new Eielson Visitor Center and a permanent Toklat Rest Stop within Denali National Park. This letter represents the consolidated comments of State agencies.

We appreciate the National Park Service's efforts to upgrade these two facilities on the west end of the Denali Park Road. These long anticipated improvements will substantially enhance the public's enjoyment of the park. The existing Eielson Visitor Center is undersized and crowded, particularly on inclement weather days and when multiple buses arrive simultaneously. While the visitor center is intended to provide multiple functions, its current size, design and condition hinders these functions. The proposed facility in the preferred alternative appears to provide adequate space for both visitor and administrative needs. We also support the design intent to accommodate anticipated increases in visitation as a result of filling shuttle buses to capacity and the possibility of the tour bus system extending some trips to Eielson.

We do, however, have some design and permitting concerns with the two proposed facilities. Neither the proposed new Eielson Visitor Center nor the Toklat Rest Stop offers any covered, outdoor shelters for inclement weather. For visitors riding the shuttle and tour buses on rainy days, outdoor shelters -- such as at the Teklanika rest stop -- provide the only opportunity for many people to experience the outdoors within the park on such days. A covered shelter or pavilion at both locations would be a welcome addition.

The relocation and improvement of the Toklat Rest Stop is also long overdue. The current site has few amenities and is aesthetically unattractive. We appreciate the Service's attempt to block wind and visually shield the site with berms; however, we are concerned that in doing so, views of the surrounding landscape by site users will be unnecessarily blocked. We are particularly concerned that the proposed berms will also restrict visibility of bears approaching the facility, thus increasing the opportunity for unwanted bear/human encounters. Bus drivers will also have

less forewarning to direct passengers to board the bus when bears approach. Also, those visitors who wander behind the berms to appreciate the view or take pictures will be unable to see when their bus is ready to depart.

We also recommend modifying the parking layout to improve visitor safety. As proposed in the preferred alternative, wildlife tour passengers will be standing in the direct line of traffic during their rest stop as they wait for hot drinks at the rear of their buses.

The Alaska Department of Environmental Conservation (DEC) has an interest in three aspects of the preferred alternative:

- Replacing the septic system at Eielson Visitor Center. The EA does not address whether or not a DEC permit is required. In summer, the visitor center is used by 1,000 visitors/day. State regulations at 18 AAC 72.200 require plan approval for onsite wastewater disposal systems serving more than a single family or duplex dwelling. Plan submittal requirements are specifically listed at 18 AAC 72.205. Depending on the volume and characteristics of the waste, a permit may be required under 18 AAC 72.215.
- Modifying the drinking water system at Eielson. We appreciate the EA acknowledgement at the bottom of page 12 that a DEC permit will be required to alter the water supply system at the new visitor center. Specifically, state regulations at 18 AAC 80.200(b) say, in part: "...in order to construct, install, alter, renovate, operate, or improve a Class A or B public water system, or any part of one, the owner or operator must have prior written approval of engineering plans that comply with 18 AAC 80.205."
- Replacing the existing chemical toilets at the Toklat Rest Stop with vault toilets. State regulations at 18 AAC 72.205(b)(5) require the applicant to submit an engineering plan to DEC for approval prior to constructing the vault toilets.

Please contact David Johnson at 907-262-5210 ext 238 to learn more about the specific DEC permit requirements for both the Eielson Visitor Center and the Toklat Rest Stop.

Thank you for your consideration of these comments. If you have any other questions, please contact me at 907-269-7477.

Sincerely,

/ss/

Sally Gibert  
State ANILCA Coordinator