

Final Visitor Services Plan
Environmental Impact Statement



CRATER LAKE

National Park • Oregon



Crater Lake

National Park • Oregon

Draft Visitor Services Plan / Environmental Impact Statement

The *Draft Visitor Services Plan / Environmental Impact Statement* described and analyzed five alternatives for the management and use of the developed areas of Crater Lake National Park. The alternatives addressed appropriate levels and kinds of visitor services and set the basis for a new concession contract. The *Draft Visitor Services Plan / Environmental Impact Statement* for Crater Lake National Park was released for formal public review on December 12, 1997, as announced in the *Federal Register*. The draft document was on public review for 45 days.

This *Final Visitor Services Plan / Environmental Impact Statement* includes only minor modifications, factual corrections and text clarifications to the draft document, plus copies of representative comment letters and responses of the National Park Service to public comments. This document is intended to be used in tandem with the draft plan.

A record of decision on the final plan will be issued 30 days after this final document has been made available for public review, as announced in the *Federal Register*. For further information about this plan, please contact Crater Lake National Park at the following address:

Superintendent
Crater Lake National Park
P.O. Box 7
Crater lake, Oregon 97064



Contents

Introduction 1

Revisions to the Document 3

Comments and Responses 19



Introduction

This document is an abbreviated final environmental impact statement (FEIS), and the material included here is to be integrated with the *Draft Visitors Services Plan / Environmental Impact Statement*. The abbreviated format has been used because changes to the draft are minor, do not result in major modification of the proposal or alternatives, and do not result in new information that may have a significant effect on the environment. Use of this format is in compliance with the 1969 National Environmental Policy Act regulations (40 CFR 1503.4(c)). It is important that the reader use the draft plan in reviewing this document because the draft and final environmental impact statements together describe the final proposed action, its alternatives, all significant environmental impacts, and the public comments that have been evaluated.

The first major part of this document contains the corrections of errors that were noted in the draft text. It also contains clarifying or modifying text changes in response to public comments and/or agency review. The second major part contains responses to public comments and is broken down into responses to governmental agencies, organizations, and individuals. Because many of the organization and individual comment letters addressed the same issue, representative letters were chosen for response and are reprinted in this final document.

The major issues of concern raised in the letters were related to:

- retaining the cultural landscape of Rim Village
- constructing any new facilities in the park. (as opposed to adaptively using existing historic structures or developing any needed facilities outside the park.)
- reducing the number of boat tours on Crater Lake from nine to seven
- eliminating boat tours
- rehabilitating the cafeteria building to its 1928 size and configuration
- removing Rim Dormitory
- water rights and levels of water use
- access for people with disabilities



Community House

REVISIONS TO THE DOCUMENT



Revisions to the Document

CORRECTIONS AND REVISIONS

Corrections and revisions to the *Final Visitor Services Plan/ Environmental Impact Statement* (FEIS) are listed in this section. Revisions were made in response to comments from public and agency reviews of the draft plan. These revisions have not resulted in substantive modification of the proposed action or the alternatives. It has been determined that the revisions do not require additional environmental analysis within this document.

Changes to existing sentences are shown in bold:

ALTERNATIVES, INCLUDING THE PROPOSED ACTION

ALTERNATIVE A: ENHANCE RESOURCE PROTECTION AND VISITORS' APPRECIATION OF THE PARK (PROPOSED ACTION)

- page 18 second paragraph, first sentence, change to read: A new visitor contact station would be built at Rim Village near the cafeteria building to provide information, orientation, interpretation, Natural History Association (NHA) sales, a **full service** post office, and year-round views of the lake.
- page 18 second paragraph, second sentence, change to read: **The community house, Sinnott Memorial, plaza comfort station, and comfort station #4 would be rehabilitated for their historic uses. The community house would be used for summer evening programs. The Sinnott Memorial would be used to present interpretive talks and exhibits about Crater Lake geology and ecosystems. The plaza comfort station and comfort station #4 would provide seasonal restroom facilities for visitors. The Kiser Studio, originally constructed as a photography studio, would be rehabilitated to offer interpretive exhibits on the cultural resources of the studio and village. The promenade and historic landscape would be rehabilitated to improve resource protection and visitor safety. All rehabilitation work would follow the *Secretary of the Interior's Standards for Rehabilitation*. Additional interpretation and wayside . . .**

- page 18 second paragraph, after seventh sentence, add: **The rehabilitated cafeteria would have a complete basement for food service and merchandise storage.**
- page 18 third paragraph, eighth sentence, change to read: **The Rim Dormitory would be removed and the site restored.**
- page 18 third paragraph, after last sentence, add: **The Crater Wall Trail historically led from the promenade down to the lake. Its north aspect and an unstable slope made the trail dangerous and difficult to maintain. The trail was thereby abandoned in 1960 and replaced with one at Cleetwood. Some visitors are still able to see the Crater Wall trailhead from the promenade, and some have climbed over the promenade wall and walked along the trail, potentially endangering themselves. This led to one fatality in 1992. To correct this public safety hazard, the trailhead will be concealed by regrading and planting with native vegetation those sections visible from the promenade.**
- page 19 second paragraph, delete first and second sentences, change to read: **The amphitheater would be retained in its present location. Visitor information and orientation would be available at a self-service kiosk near the Mazama Village store. The existing road system would remain.**
- page 20 first paragraph, replace first three sentences with the following: **The single-wall underground storage tank and approximately 1,100 feet of single-wall aboveground fuel line would be removed and the sites restored. A new fuel system would be installed. The entire system would be designed and constructed in accordance with State of Oregon and U.S. Environmental Protection Agency (EPA) regulatory requirements for underground gasoline storage and delivery systems. A new underground storage tank would be installed near the rim parking lot. A new surge tank in a permanent structure at the rim would have a capacity slightly less than that of the day tank at lakeside to minimize the potential for overfilling the lakeside day tank. Approximately 3,000 feet of double-wall fuel line from the rim underground storage tank to the existing lakeside day tank would be provided. Approximately 200 feet of fuel line would be installed aboveground from the underground storage tank to the trail; approximately 2,500 would be laid underground in the trail; and the final segment of line (approximately 300 feet) would be placed aboveground from trail to the lakeside day tank, paralleling the existing fuel line location. A new double-wall underground fuel line from the lakeside day tank to the dispensing unit would be provided. The dispensing pedestal and hose reel would be upgraded, and positive locking aircraft style dispensing units would be installed. The National Park Service would identify response procedures to address fuel spills or leaks.**
- page 20 second paragraph, replace second sentence with the following: **Munson Valley would remain the focal point for park administration and housing. During summer, the Steel Information Center, formerly the Ranger Dormitory, would serve as the base for interpreting the Munson Valley Historic District and other historic and cultural resources remotely scattered throughout the park. Interpretive services would include exhibits, talks, tours and video or slide program presentations. Public restrooms would be available during operating hours.**
- During the park's off-season, October through May, the Steel Information Center would serve as an interpretive, educational, and resource center for groups and for individuals with special interpretive or resource interests. When the road between Park Headquarters and Rim Village is temporarily closed due to inclement weather and poor road conditions, the facility would serve as a backup visitor contact station while plows reopened the road.**

The Crater Lake Natural History Association would maintain a year round sales area. The post office at the Steel Information Center would continue to serve visitors, park residents, park administration and the concession during winter. A full-service post office would operate at the Rim Village visitor contact station during the summer.

page 20

insert after last paragraph: Access to visitor facilities would conform to federal accessibility standards, and accessible parking with adjoining aisles would be next to accessible routes to these facilities. As explained in the NPS *Management Policies*, the National Park Service would provide the highest feasible level of physical access for people with disabilities to historic properties, consistent with the preservation of the property's significant historical attributes. Access modifications for people with disabilities would be designed to minimize effects on the features of a property that contribute to its significance. All new facilities would be accessible. At Rim Village, the trail to the Sinnott Memorial would not be made accessible. However, an accessible route between the cafeteria/visitor contact station area and the caldera edge would be provided where appropriate and feasible, and an accessible route from the cafeteria/visitor contact station area to the lodge would be constructed. Other new and existing visitor structures at Mazama Village, at Munson Valley, and at the Cleetwood developed area on the rim would be made accessible.

ALTERNATIVE B (NO ACTION)

page 29

fifth paragraph, replace sentences two through four with the following: The single-wall underground storage tank and approximately 1,100 feet of single-wall aboveground fuel line would be removed and the sites restored. A new fuel system would be installed. The entire system would be designed and constructed in accordance with State of Oregon and U.S. Environmental Protection Agency (EPA) regulatory requirements for underground gasoline storage and delivery systems. A new underground storage tank would be installed near the rim parking lot. A new surge tank in a permanent structure at the rim would have a capacity slightly less than that of the day tank at lakeside to minimize the potential for overfilling the lakeside day tank. Approximately 3,000 feet of double-wall fuel line from the rim underground storage tank to the existing lakeside day tank would be provided. Approximately 200 feet of fuel line would be installed aboveground from the underground storage tank to the trail; approximately 2,500 would be laid underground in the trail; and the final segment of line (approximately 300 feet) would be placed aboveground from trail to the lakeside day tank, paralleling the existing fuel line location. A new double-wall underground fuel line from the lakeside day tank to the dispensing unit would be provided. The dispensing pedestal and hose reel would be upgraded, and positive locking aircraft style dispensing units would be installed. The National Park Service would identify response procedures to address fuel spills or leaks.

page 29

insert after last paragraph: Access to visitor facilities would conform to federal accessibility standards, and accessible parking with adjoining aisles would be next to accessible routes to these facilities. As explained in the NPS *Management Policies*, the National Park Service would provide the highest feasible level of physical access for people with disabilities to historic properties, consistent with the preservation of the property's significant historical attributes. Access modifications for people with disabilities would be designed to minimize effects on the features of a property that contribute to its significance. All new facilities would be accessible. At Rim Village, the trail to the Sinnott Memorial would not be made accessible. However, an accessible route between the cafeteria/visitor contact station area and the caldera edge would be provided where appropriate and feasible, and an accessible route from the cafeteria/visitor contact station area to the lodge would be constructed. Other new and existing visitor structures at Mazama Village, at Munson Valley, and at the Cleetwood developed area on the rim would be made accessible.

ALTERNATIVE C: PROVIDE OPPORTUNITIES FOR SELF-DIRECTED VISITOR EXPERIENCES

page 39 insert after last paragraph: Access to visitor facilities would conform to federal accessibility standards, and accessible parking with adjoining aisles would be next to accessible routes to these facilities. As explained in the *NPS Management Policies*, the park service would provide the highest feasible level of physical access for people with disabilities to historic properties, consistent with the preservation of the properties significant historical attributes. Access modifications for people with disabilities would be designed to least affect the features of a property that contributes to its significance. All new facilities would be accessible. At Rim Village, the trail to the Sinnott Memorial would not be made accessible. However, an accessible route between the cafeteria/visitor contact station area and the caldera edge would be provided where appropriate and feasible, and an accessible route from the cafeteria/visitor contact station area to the lodge would be constructed. Other new and existing visitor structures at Mazama Village, at Munson Valley, and at the Cleetwood developed area on the rim would be made accessible.

ALTERNATIVE D: OFFER A VARIETY OF NPS AND COMMERCIAL VISITOR SERVICES

page 50 first paragraph, replace sentences two through six with the following: The single-wall underground storage tank and approximately 1,100 feet of single-wall aboveground fuel line would be removed and the sites restored. A new fuel system would be installed. The entire system would be designed and constructed in accordance with State of Oregon and U.S. Environmental Protection Agency (EPA) regulatory requirements for underground gasoline storage and delivery systems. A new underground storage tank would be installed near the rim parking lot. A new surge tank in a permanent structure at the rim would have a capacity slightly less than that of the day tank at lakeside to minimize the potential for overfilling the lakeside day tank. Approximately 3,000 feet of double-wall fuel line from the rim underground storage tank to the existing lakeside day tank would be provided. Approximately 200 feet of fuel line would be installed aboveground from the underground storage tank to the trail; approximately 2,500 would be laid underground in the trail; and the final segment of line (approximately 300 feet) would be placed aboveground from trail to the lakeside day tank, paralleling the existing fuel line location. A new double-wall underground fuel line from the lakeside day tank to the dispensing unit would be provided. The dispensing pedestal and hose reel would be upgraded, and positive locking aircraft style dispensing units would be installed. The National Park Service would identify response procedures to address fuel spills or leaks.

page 50 insert after last paragraph: Access to visitor facilities would conform to federal accessibility standards, and accessible parking with adjoining aisles would be next to accessible routes to these facilities. As explained in the *NPS Management Policies*, the National Park Service would provide the highest feasible level of physical access for people with disabilities to historic properties, consistent with the preservation of the properties significant historical attributes. Access modifications for people with disabilities would be designed to least affect the features of a property that contributes to its significance. All new facilities would be accessible. At Rim Village, the trail to the Sinnott Memorial would not be made accessible. However, an accessible route between the cafeteria/visitor contact station area and the caldera edge would be provided where appropriate and feasible, and an accessible route from the cafeteria/visitor contact station area to the lodge would be constructed. Other new and existing visitor structures at Mazama Village, at Munson Valley, and at the Cleetwood developed area on the rim would be made accessible.

ALTERNATIVE E: FOCUS VISITOR FACILITIES AT RIM VILLAGE

page 60

third paragraph, replace sentences two through four with the following: **The existing single-wall underground storage tank and approximately 1,100 feet of existing single-wall aboveground fuel line would be removed and the sites restored. A new fuel system would be installed. The entire system would be designed and constructed in accordance with current State of Oregon and EPA regulatory requirements for underground gasoline storage systems. A new underground storage tank would be installed at the rim parking lot. The new surge tank in a permanent structure at the rim would have a capacity slightly less than that of the day tank at lakeside to minimize the potential for overfilling the lakeside day tank. Approximately 3,000 feet of double-wall fuel line from the rim underground storage tank to the existing lakeside day tank would be provided. Approximately 200 feet of fuel line would be installed aboveground from the underground storage tank to the trail; approximately 2,500 would be laid underground in the trail; and the final segment of line (approximately 300 feet) would be placed aboveground from trail to the lakeside day tank, paralleling the existing fuel line location. A new double-wall underground fuel line from the lakeside day tank to the dispensing unit would be provided. The dispensing pedestal and hose reel would be upgraded, and positive locking aircraft style units would be installed. A monitoring system would be put in place. The National Park Service would identify response procedures to address potential fuel spills or leaks.**

page 60

insert after last paragraph: **Access to visitor facilities would conform to federal accessibility standards, and accessible parking with adjoining aisles would be next to accessible routes to these facilities. As explained in the NPS *Management Policies*, the park service would provide the highest feasible level of physical access for people with disabilities to historic properties, consistent with the preservation of the properties significant historical attributes. Access modification for people with disabilities would be designed to least affect the features of a property that contributes to its significance. All new facilities would be accessible. At Rim Village, the trail to the Sinnott Memorial would not be made accessible. However, an accessible route between the cafeteria/visitor contact station area and the caldera edge would be provided where appropriate and feasible, and an accessible route from the cafeteria/visitor contact station area to the lodge would be constructed. Other new and existing visitor structures at Mazama Village, at Munson Valley, and at the Cleetwood developed area on the rim would be made accessible.**

TABLE I: COMPARISON OF ALTERNATIVES

SERVICES AND FACILITIES	ALTERNATIVE A: PROPOSED ACTION	ALTERNATIVE B: NO ACTION	ALTERNATIVE C: PROVIDE OPPORTUNITIES FOR SELF-DIRECTED VISITOR EXPERIENCES	ALTERNATIVE D: OFFER A VARIETY OF NPS AND COMMERCIAL VISITOR SERVICES	ALTERNATIVE E: FOCUS VISITOR FACILITIES AT RIM VILLAGE
RIM VILLAGE					
Visitor Contact (NPS)	Provide year-round visitor information, orientation, accessible viewing of lake, and interpretive exhibits in new visitor contact station. Rehabilitate the community house for summer evening programs	Provide limited visitor information and orientation at Kiser Studio (summer) and cafeteria building (winter); year-round accessible viewing of the lake would not be provided; remove the community house	Provide limited year-round visitor information, orientation, and accessible viewing of the lake in rehabilitated 1928 part of cafeteria building; remove later additions to cafeteria building; remove the community house	Same as the proposed action	Provide year-round visitor orientation and interpretation with accessible viewing of lake, indoor evening programs, changeable interpretive exhibits, and auditorium in new activity center near the cafeteria site; remove the community house
Interpretive Programs (NPS)	Provide roving interpreter, historical walks, interpretive waysides, and evening programs during the summer	Provide roving interpreter, historical walks, and interpretive waysides during the summer	Same as no-action alternative	Same as the proposed action	Same as the proposed action
Sinnott Memorial	Present interpretive talks about Crater Lake geology; develop exhibits about Crater Lake geology and lake ecosystems	Present interpretive talks about Crater Lake geology	Same as no-action alternative	Same as the proposed action	Provide limited interpretation at Sinnott Memorial because new activity center would be the focus of interpretation
Kiser Studio	Provide cultural resource interpretive exhibits during the summer	Provide NPS visitor contact and orientation	Same as the proposed action	Provide Artist-in-the-Park program during the summer	Same as the proposed action
Food Services (Concession)	Offer fine dining at Crater Lake Lodge during the summer and year-round deli/fast food service in rehabilitated 1928 part of cafeteria building; remove later additions to cafeteria building but provide a complete basement for food service and merchandise storage.	Retain cafeteria and restaurant at cafeteria building and fine dining at Crater Lake Lodge during the summer; rehabilitate the cafeteria building	Offer fine dining at Crater Lake Lodge during the summer; remove all other food service	Offer fine dining at Crater Lake Lodge during the summer; provide year-round cafeteria in new facility at the lower parking area; remove the cafeteria building	Offer fine dining at Crater Lake Lodge during the summer; provide year-round cafeteria and restaurant at new activity center; remove the cafeteria building
Gift and Sundry Sales (Concession)	Offer limited numbers of sundries and gifts (related to Crater Lake) in rehabilitated 1928 part of cafeteria building	Retain year-round gift (related to Crater Lake) and sundry sales at cafeteria building	Relocate sales of sundries and gifts to Mazama Village	Offer sundries and gifts (related to Crater Lake) in new facility at the lower parking area	Sell sundries and gifts (related to Crater Lake) at new activity center
Recreation Equipment (Concession)	None	None	None	Rent appropriate recreation equipment out of a new facility at the lower parking area	Rent appropriate recreation equipment out of the new activity center
Lodging (Concession)	Continue summer lodging at Crater Lake Lodge	Same as the proposed action	Same as the proposed action	Same as the proposed action	Same as the proposed action
Natural History Association (NHA) Sales	Provide space in new visitor contact station for NHA sales that support NPS interpretive and research programs at Crater Lake; provide a full service post office	Continue to provide space at Kiser Studio for seasonal NHA sales that support NPS interpretive and research programs at Crater Lake	Provide space in rehabilitated part of 1928 cafeteria building for NHA sales that support NPS interpretive and research programs at Crater Lake; provide post office	Same as the proposed action	Provide space in the new activity center for NHA sales that support NPS interpretive and research programs at Crater Lake; provide post office
Roads and Trails	Retain Rim Village Drive to lodge. Construct accessible trail from the cafeteria/visitor contact area to the promenade where appropriate and feasible. Provide accessible route from the cafeteria/visitor contact area to the lodge. For safety purposes, conceal the Crater Wall Trail trailhead by regrading and planting.	Same as the proposed action	Same as the proposed action	Remove Rim Village Drive; construct new access road from remote parking area and visitor contact station to lodge	Remove Rim Village Drive; construct new access road from parking structure and activity center to lodge for shuttle buses
Parking	Remove cafeteria parking lot; construct a smaller parking lot behind the cafeteria building; retain parking along Rim Village Drive and at the lodge and remove Rim Dormitory parking lot and access road and restore site to its natural condition	Retain parking along Rim Village Drive, in front of cafeteria building at the lodge, and at Rim Dormitory	Construct a small parking lot behind visitor contact station; remove parking from rim edge, along Rim Village Drive, and at Rim Dormitory; build additional parking loop at lodge for guests	Construct a small parking lot behind the visitor contact station; build a new parking lot off the rim; remove parking along Rim Village Drive; and provide more parking for lodge at the Rim Dormitory site	Remove all parking from Rim Village and construct new three-level parking structure off the rim with a shuttle system to provide access to the new activity center and lodge
Rim Dormitory (Concession Housing)	Remove the 70-bed Rim Dormitory	Retain Rim Dormitory	Same as the proposed action	Same as the proposed action	Same as the proposed action
Estimated Costs (in Millions of Dollars)*	\$15.0	\$6.1	\$12.4	\$17.1	\$59.9

SERVICES AND FACILITIES	ALTERNATIVE A: PROPOSED ACTION	ALTERNATIVE B: NO ACTION	ALTERNATIVE C: PROVIDE OPPORTUNITIES FOR SELF-DIRECTED VISITOR EXPERIENCES	ALTERNATIVE D: OFFER A VARIETY OF NPS AND COMMERCIAL VISITOR SERVICES	ALTERNATIVE E: FOCUS VISITOR FACILITIES AT RIM VILLAGE
MAZAMA VILLAGE					
Visitor Contact (NPS)	Build a self-service information kiosk near the Mazama Village store to provide seasonal information for visitors entering the park	No self-service information kiosk would be provided	Same as the proposed action	Same as the proposed action	Same as the proposed action
Interpretive Programs (NPS)	Continue to provide evening programs at the amphitheater and offer natural history walks during the summer	Same as the proposed action	Same as the proposed action	Relocate amphitheater to a more central location; provide evening programs at the amphitheater; and offer natural history walks during the summer	Same as alternative D
Camper Services (Concession)	Retain existing camper supplies and public showers at Mazama Village store; remove public laundry	Retain existing camper supplies and public showers and laundry at the Mazama Village store	Retain existing camper supplies at Mazama Village store; remove public laundry and showers	Same as the no-action alternative	Same as the no-action alternative
Food Services (Concession)	Retain limited food service at the Mazama Village store during the summer and develop a new seasonal restaurant	Retain limited food service at the Mazama Village store during the summer	Increase limited food service slightly from existing levels	Construct a new cafeteria that could operate year-round	Construct a new restaurant that could operate year-round
Gift and Sundry Sales (Concession)	Increase space at the seasonal camper store for sales of sundries and gifts (related to Crater Lake) slightly over existing levels	Retain limited sundry and gift sales (related to Crater Lake) at the seasonal camper store	Same as the proposed action	Offer sundries and gifts (related to Crater Lake) year-round at the camper store	Same as alternative D
Gasoline Station (Concession)	Retain seasonal gasoline sales at the camper store	Same as the proposed action	Same as the proposed action	Provide year-round gasoline and emergency vehicle service during the summer	Same as alternative D
Recreation Equipment (Concession)	None	None	None	Provide recreation equipment rentals	Same as alternative D
Lodging (Concession)	Retain the 40-unit Mazama Village Motor Inn for seasonal public lodging	Same as the proposed action	Convert the 40-unit Mazama Village Motor Inn to concession employee housing; no public lodging would be available at Mazama Village	Build 40 new units with kitchenettes to provide year-round lodging; retain the existing 40 seasonal units	Same as alternative D
Roads	Retain existing roads to provide adequate seasonal access to services and facilities	Same as the proposed action	Same as the proposed action	Modify roads to allow for better snow removal for year-round operations	Same as alternative D
Parking	Provide parking at the camper store and restaurant	Rely on existing parking areas to accommodate the level of services and facilities of this alternative	Continue to provide camper store parking	Provide amphitheater, camper store, and cafeteria parking; construct covered parking to accommodate the new lodging units	Same as alternative D
Mazama Dormitory (Concession Housing)	Complete the 70-bed Mazama Dormitory in 1998; locate or construct employee housing outside the park, or add an additional 30-beds to the Mazama Dormitory (100 total), or build up to 30 RV sites in the park.	Complete the 70-bed Mazama Dormitory in 1998	Complete the 70-bed Mazama Dormitory in 1998; convert the 40-unit Mazama Village Motor Inn to concession employee housing	Same as the no-action alternative	Same as the proposed action, plus additional housing would be constructed after further planning determined a suitable location
Maintenance Facility (Concession)	Construct a maintenance facility near the Mazama Dormitory site	None	Construct a concession maintenance facility near the Mazama Dormitory site	Construct a larger maintenance facility with a small warehouse near the Mazama Dormitory site	Same as alternative D
Estimated Costs (in Millions of Dollars)*	\$3.6	\$0.0	\$1.9	\$10.9	\$9.8

SERVICES AND FACILITIES	ALTERNATIVE A: PROPOSED ACTION	ALTERNATIVE B: NO ACTION	ALTERNATIVE C: PROVIDE OPPORTUNITIES FOR SELF-DIRECTED VISITOR EXPERIENCES	ALTERNATIVE D: OFFER A VARIETY OF NPS AND COMMERCIAL VISITOR SERVICES	ALTERNATIVE E: FOCUS VISITOR FACILITIES AT RIM VILLAGE
CLEETWOOD					
Wayside Exhibits (NPS)	Increase wayside exhibits along trail	Retain wayside exhibits at top and bottom of trail	Increase wayside exhibits at top and bottom of trail and provide self-guiding trail pamphlets	Same as the proposed action	Same as the proposed action
Interpretive Programs (NPS)	Continue to provide NPS ranger-led interpretive talks on boat tours; add NPS interpreter at Wizard Island	Same as the proposed action	None	Same as the proposed action	Same as the proposed action
Boat Tours (Concession)	Offer seven boat tours per day with 8th boat trip when needed for Wizard Island pickup; offer a variety of tour lengths and routes	Maintain current level — nine tours per day with 10th boat trip when needed for Wizard Island pickup	Eliminate boat tours	Provide eight tours per day with 9th boat trip when needed for Wizard Island pickup; offer multiple tour lengths and routes	Same as no-action alternative
Ticket Sales (Concession)	Sell tickets at the rim at a permanent structure; institute a reservation system to allow visitors to buy tickets by phone and at concession facilities in the park; hold a number of tickets for same-day purchase	Sell tickets at nonpermanent concession facility at rim	None	Same as the proposed action	Same as the proposed action
Food Services (Concession)	Offer limited prepackaged food and beverages at rim in permanent structure	Continue to use temporary structure for the sales of prepackaged food and beverages	None	Same as the proposed action	Same as the proposed action
Sundry Sales (Concession)	Offer limited sundry sales at rim in a permanent structure	Continue to use temporary structure for limited sundry sales	None	Same as the proposed action	Same as the proposed action
Parking	Restripe existing parking lot to provide 120 spaces 9 feet wide; no overflow parking along Rim Drive would be anticipated	Retain existing parking lot dimensions; restripe with 120 spaces 9 feet wide; overflow parking would continue at peak times along Rim Drive	Provide minimal parking (50 spaces); restore rest of existing parking lot to natural conditions	Restripe parking lot to provide 120 spaces 9 feet wide; add drop-off area; overflow parking would be anticipated along Rim Drive at peak periods because of the level of tours provided	Same as alternative D except the parking lot would be widened to provide RV spaces and there would be a greater level of overflow parking along Rim Drive during peak periods
Trail	Retain trail with some additional erosion control measures; use low-impact vehicles for NPS research operations and concessions	Retain existing trail; use small tractors for concession and NPS operations	Retain trail with some additional erosion control measures; use low impact powered equipment for NPS research operations where possible	Modify trail alignment by installing a grated metal staircase before the slide chute for visitor safety; retain trail through chute for park use only; allow only low-impact powered vehicles on trail for NPS and concession operations	Retain existing trail and construct deflector walls above trail through slide chute; cut back rock overhanging trail below slide chute; use low-impact powered vehicles for NPS and concession operations
Trailhead Support Facilities	Construct composting / vault toilet; store boat operations and maintenance equipment in a permanent structure	Retain portable toilets	Retain portable toilets at rehabilitated portion of the parking area	Construct composting / vault toilet	Construct composting / vault toilet and a larger structure for concession boat maintenance and equipment storage
Lakeside Support Facilities	Improve bulkhead and replace dock (may not be used by boats at extreme water levels); build a small storage structure for concession and NPS boat operations; provide small waiting area with shade structure; retain existing toilet	Retain existing toilet, dock, bulkhead, and gangway; build nonpermanent storage for boat operations; only minimal facilities for NPS and concession equipment would be provided	Remove existing dock and bulkhead; construct small dock and equipment storage for research vessel; retain existing toilet	Construct new dock and bulkhead to access boats at all water levels; build permanent structure for concession and NPS boat operations; provide shade structure and open-air waiting area with seating; retain existing toilet	Same as alternative D
Fuel System	The entire fuel system is scheduled to be replaced in 1998 and will consist of an underground storage tank near the rim; double-wall primarily underground fuel line beneath the trail to a screened, protected aboveground storage tank at lakeside; double-wall, underground fuel line to a dispensing pump with positive locking aircraft style dispensing units; system will meet ODEQ and EPA standards	Same as the proposed action	Remove entire fuel system and restore sites; gasoline needed for search and rescue and research boats would be carried down in containers on low-impact vehicles	Same as the proposed action	Same as the proposed action
Estimated Costs (in Millions of Dollars)*	\$2.0	\$1.0	\$1.1	\$2.6	\$3.4

SERVICES AND FACILITIES	ALTERNATIVE A: PROPOSED ACTION	ALTERNATIVE B: NO ACTION	ALTERNATIVE C: PROVIDE OPPORTUNITIES FOR SELF-DIRECTED VISITOR EXPERIENCES	ALTERNATIVE D: OFFER A VARIETY OF NPS AND COMMERCIAL VISITOR SERVICES	ALTERNATIVE E: FOCUS VISITOR FACILITIES AT RIM VILLAGE
MUNSON VALLEY					
Visitor Contact (NPS)	During the summer, the Steel Information Center would serve as the base for interpreting the Munson Valley Historic District and other historic and cultural resources scattered throughout the park. In the park's off-season, October through May, the Steel Information Center would serve as an interpretive, educational, and resource center for groups and individuals with special interpretive or resource interests. During the winter, it would be the backup visitor contact station to the facility at Rim Village when the road to the rim is closed due to inclement weather.	Provide year-round visitor contact and interpretive exhibits at the Steel Information Center	No visitor contact during the summer; provide backup visitor contact during the winter	Same as alternative C	Same as alternative C
Natural History Association (NHA) Sales	Offer NHA sales at Steel Information Center to support NPS interpretive and research programs at Crater Lake; post office would continue to serve visitors, park residents, park administration, and the concession during the winter.	Same as the proposed action	Provide backup NHA sales and post office areas in winter	Same as alternative C	Same as alternative C
Estimated Costs (in millions of Dollars)*	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
TOTAL ESTIMATED COSTS (IN MILLIONS OF DOLLARS)	\$20.6	\$7.1	\$15.4	\$30.6	\$73.1

* NOTE: A significant component of the estimated costs to implement any of the alternatives would be incurred by the park concessioner. The exact amount and payment conditions will be presented in the new long-term concession contract. The concessioner costs will be phased in over a period of time and may occur in more than one long-term contract.

Estimated costs will be further refined for the proposed action when it moves into the design phase.

AFFECTED ENVIRONMENT

NATURAL ENVIRONMENT

Special Status Species

- page 87 last paragraph, first sentence, change to read: **The bull trout (*Salvelinus confluentus*) is currently proposed for listing as an endangered species in the Klamath River Basin by the U.S. Fish and Wildlife Service and is also a state-listed species. The U.S. Fish and Wildlife Service is scheduled to make their rule on this proposed listing by June 13, 1998.**
- page 89 fifth paragraph: Add to end of last sentence: **(Harry 1997).**

CULTURAL ENVIRONMENT

Ethnographic Resources

- page 90 first paragraph, replace first two sentences with the following: **Although three Indian groups bordered the Crater Lake area on the west - Molala, Upper Umpqua, and Takelma - the Klamath Indians, living to the east, have long been recognized as the tribe that used the Crater Lake area most extensively.**
- page 90 third paragraph, end of paragraph, add two sentences. **The National Park Service would conduct initial assessments for construction projects to evaluate potential impacts to sacred resources. This would be done as part of the Park Service's continuing consultation process.**
- page 90 fourth paragraph, insert after last sentence: **The National Park Service will continue to consult with the tribes and maintain open lines of communication regarding the entire spectrum of ethnographic and archeological work in the park, including selection of archeological consultants and archeological site assessment work.**

Historic Resources

- page 90 sixth paragraph, change to read: **Prior to 1997, four buildings in Rim Village were listed on the national register under criterion A for their association with the history and development of Crater Lake National Park, and criterion C, as outstanding examples of rustic architectural design. These include Crater Lake Lodge (1981), Sinnott Memorial building (1988), and comfort stations no. 68 and 72 (1988). On September 18, 1997, Rim Village Historic District was listed on the national register under Criteria A and C.**
- pages 90 & 91 seventh paragraph (pg 90) and beginning portion of first paragraph (pg 91), replace with the following: **In the historic district that was listed on the national register in 1997, seven buildings (including the aforementioned four) and other individual features in Rim Village were determined to contribute to the district's significance as a historic designed landscape. These features are eligible under criterion A for . . .**

ENVIRONMENTAL CONSEQUENCES*

ALTERNATIVE A: PROPOSED ACTION

Natural Resources

Impacts on Soils / Geology / Vegetation:

- page 101 second paragraph, third sentence, modify as follows: About **2.3** acres would be rehabilitated by removing the Rim Dormitory, **the Rim Dormitory parking lot and access road**, and the large cafeteria parking lot.
- page 101 fourth paragraph, first sentence, modify as follows: Erosion potential would temporarily increase during the installation of **approximately 2,500 feet of a double-wall fuel line and the construction** of new retaining walls along the Cleetwood Trail.

Cultural Resources

Impacts on Historic Resources:

- page 107 sixth paragraph, revise as follows: Constructing a visitor contact facility between the cafeteria building and the plaza comfort station in Rim Village would have ~~only~~ a minor effect on the ~~proposed~~ historic district because it would be constructed in a style compatible with other buildings in the district. Removing the large parking area along the rim edge in front of the cafeteria would eliminate this circulation feature from the historic district **and thus will constitute an adverse effect on the historic district**. However, the area would be revegetated to be compatible with the village's historic designed landscape. The new parking lot behind the cafeteria would **have a visual effect on the** historic district, **although** most of this lot would be outside the boundaries of the ~~proposed~~ historic district. **Removal of the Rim Dormitory would not be an adverse effect because the building is a noncontributing structure to the significance of the historic district. The park's actions to obscure visibility of the historic Crater Wall trailhead from the promenade for public safety reasons would result in the loss of some historic fabric, but that would have little impact on the remaining vestiges of the abandoned trail.**

A programmatic agreement will be developed among the National Park Service, the Oregon State Historic Preservation Office, and the Advisory Council on Historic Preservation to provide measures for mitigating the adverse effects.

* The revisions to the environmental consequences in this section of the report should be referenced by the reader when reading Table 2: Comparison of Impacts in the *Draft Visitor Services Plan Environmental Impact Statement*.

Visitor Experience

Impacts on Visitors at Rim Village:

- page 108 add a new paragraph after the sixth paragraph. **Visitor safety would be improved by obliterating the trailhead of the abandoned dangerous Crater Wall Trail.**
- page 108 eighth paragraph, modify first sentence: Visitors would benefit from enhanced **safety**, information, and interpretive opportunities at the new visitor contact station and other sites, slightly reduced congestion, and continued opportunities for lodging and fine dining at Crater Lake Lodge.

Impacts on Visitors at Mazama Village:

- page 108 ninth paragraph, eliminate second sentence: ~~Relocating the amphitheater to a more central location would allow for easier visitor access.~~
- page 109 fifth paragraph, first sentence, modify as follows: Visitors would benefit from information provided at a new self-service kiosk, ~~and the relocated amphitheater would provide visitors with easier access to programs.~~

Impacts on Visitors at Cleetwood:

- page 110 new paragraph after the fourth paragraph: **Some visitors will be inconvenienced if the Cleetwood Trail and boat operation are closed for the 1998 summer season due to installation of a new boat fuel system. Short term visitor inconveniences will occur in portions or all of this or a future summer season(s) with closure of Cleetwood facilities and services due to construction activities.**

Impacts on Visitors at Munson Valley:

- page 110 replace seventh paragraph with the following: **Visitors would benefit from enhanced interpretation of the Munson Valley Historic District during summer. Some visitors might be inconvenienced because of the reduced orientation and information function at the Steel Information Center. Winter visitors would continue to benefit from the information provided at the Steel Information Center when inclement weather forces closure of the Rim Village visitor contact station.**
- page 110 replace ninth paragraph with the following: **Cultural and historical interpretive programs and educational services based at the Steel Information Center would enhance visitors' appreciation and understanding of significant park resources. Visitors seeking orientation and information could easily find these services three miles away at Rim Village. During winter, the Steel Information Center would provide orientation services when the Rim Village visitor contact station was inaccessible. Educational groups and organizations would benefit from an indoor facility at the Steel Information Center during winter, when most visitor facilities are closed due to deep snows and customary severe weather.**

ALTERNATIVE B: NO ACTION

Visitor Experience

Impacts on Visitors at Cleetwood:

page 116 new paragraph at the top of the page: **Some visitors will be inconvenienced if the Cleetwood Trail and boat operation are closed for the 1998 summer season due to the installation of a new boat fuel system. Short-term visitor inconveniences would occur in portions or all of this or a future summer season(s) with the closure of Cleetwood facilities and services due to construction activities.**

ALTERNATIVE D: OFFER A VARIETY OF NPS AND COMMERCIAL VISITOR SERVICES

Visitor Experience

Impacts on Visitors at Cleetwood

page 134 new paragraph after the third paragraph: **Some visitors will be inconvenienced if the Cleetwood Trail and boat operation are closed for the 1998 summer season due to the installation of a new boat fuel system. Short-term visitor inconveniences would occur in portions or all of this or a future summer season(s) with the closure of Cleetwood facilities and services due to construction activities.**

ALTERNATIVE E: FOCUS VISITOR SERVICES AT RIM VILLAGE

Visitor Experience

Impacts on Visitors at Cleetwood

page 144, new paragraph after the second paragraph: **Some visitors will be inconvenienced if the Cleetwood Trail and boat operation are closed for the 1998 summer season due to the installation of a new boat fuel system. Short-term visitor inconveniences would occur in portions or all of this or a future summer season(s) with the closure of Cleetwood facilities and services due to construction activities.**

SELECTED REFERENCES

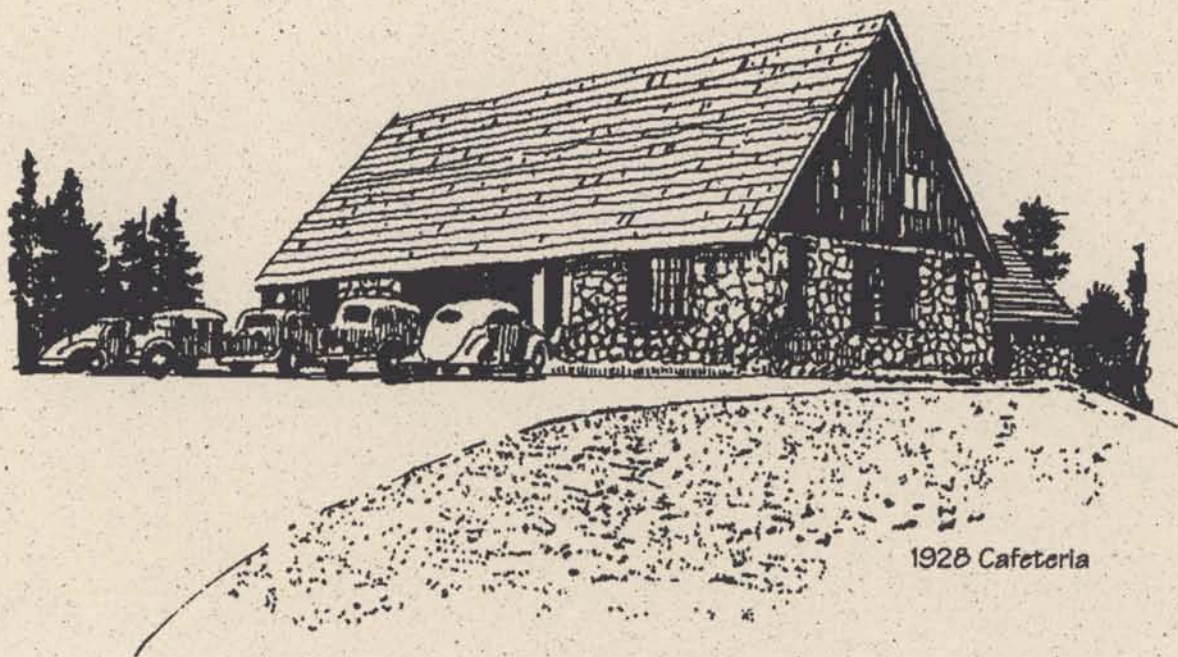
page 156 The following should be added to the list of references in alphabetical order:

Harry, David J.

1997 "Archeological Investigations at Crater Lake National Park, Klamath County, Oregon" National Park Service, Crater Lake , Oregon

page 160 The 1996b entry should be deleted and replaced by the following:

1997b National Register of Historic Places Registration Form, "Rim Village Historic District," prepared by Steven R. Mark, Crater Lake National Park, OR. (Listed September 18, 1997).



COMMENTS AND RESPONSES



Comments and Responses

This section includes a summary of comments received through letters following the release of the draft plan on the week of December 8, 1997. A notice of availability was published in the *Federal Register* on December 12, 1997, which officially began the 45-day public review period. Approximately 500 copies of the draft were distributed to government agencies, public interest groups, and individuals.

A total of 38 comment letters were received from government agencies, organizations, interest groups, and individuals during the comment period. All letters from governmental agencies are reprinted in this section. Also included are reprints of letters from individuals and interest groups that raised points needing clarification, resulted in text corrections, or were chosen to represent the range of issues included in the individual letters. No responses are provided to comments that only expressed opinions and did not identify a needed text clarification or correction.

Some of the written comments expressed preference for all or most elements of alternative A, the proposed action (11 letters), alternative B, no action (2 letters), and alternative C (4 letters). Other letters received from organizations and interest groups focused on specific actions in the alternatives, and did not endorse any alternative preference.

COMMENTS

RESPONSES

38

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 9th Avenue
Seattle, Washington 98101

JAN 29 1998

Reply To
Attn Of: ECO-088

Albert J. Hendricks, Superintendent
Crater Lake National Park
PO Box 7
Crater Lake, Oregon 97604

Re: Visitor Services Plan, Crater Lake National Park
Draft Environmental Impact Statement

Dear Mr. Hendricks:

The U.S. Environmental Protection Agency (EPA) has received the Visitor Services Plan for Crater Lake National Park Draft Environmental Impact Statement (EIS) for review in accordance with our responsibilities under the National Environmental Policy Act and under Section 509 of the Clean Air Act.

EPA Region 10 has used a screening tool to conduct a limited review of the draft EIS. Based upon the screen, we do not foresee having any major environmental objections to the proposed project. Therefore, we will not be conducting a detailed review of the draft EIS.

If you have any questions, please contact me in Seattle at 206/553-8574.

Sincerely,

Richard H. Parkin, Manager
Geographic Implementation Unit

Printed on Recycled Paper

Environmental Protection Agency

Comment noted.

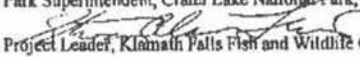
United States Department of the Interior

FISH AND WILDLIFE SERVICE
 Klamath Falls Fish & Wildlife Office
 6610 Washburn Way
 Klamath Falls, OR 97603
 (541) 885-8491 FAX: (541) 885-7837

January 21, 1998

In Reply Refer To: 1-10-97-TA-13

Memorandum

To: Park Superintendent, Crater Lake National Park, Crater Lake, Oregon
 From:  Project Leader, Klamath Falls Fish and Wildlife Office, Klamath Falls, Oregon
 Subject: Comments on Draft Visitor Services Plan/Environmental Impact Statement for the Proposed redesign of the Cove parking area, trail, and dock area.

This memorandum acknowledges the U. S. Fish and Wildlife Service's (Service) receipt of your Draft Visitor Services Plan/Environmental Impact Statement for Crater Lake National Park (Park). The plan was received by us on December 5, 1997. The Service has reviewed this document with emphasis on how the proposed action could affect threatened and endangered species and other sensitive wildlife and plants.

The issue of potential significance to the Service is that of water flows in Annie Spring and Annie Creek. Annie Creek empties into the Wood River which helps support the habitat of the Shortnose sucker (*Chasmistes brevirostris*) and the Lost River sucker (*Deltistes luxatus*). Both species are federally listed as endangered and critical habitat is proposed. The Wood River has specifically been identified as a spawning area for the Lost River sucker¹. Therefore any alternative that results in a decline of quantity or quality of the flows of Annie Spring/Creek is less desirable because of its potential impact to habitats downstream. As identified in the plan, alternative A (the proposed) or C would result in an *increase* in the flows of Annie Spring/Creek making them the preferable alternatives when considering sensitive species and habitats.

The Service questioned the continued use of water from Annie Spring rather than the exploration of other potential water sources. We also were concerned about the effects of the sewage treatment on water quality and the hydrological characteristics of the area. These issues were discussed in a phone conversation with John Miele of your staff on January 9th, 1998. John explained that several years ago a study was conducted to explore using wells as a water source. The conclusion was that well drilling could affect the hydrology of Crater Lake and because of

¹Markle, D. F. and D. C. Simon. 1993. Final Report to U. S. Bureau of Reclamation, Klamath Falls, Oregon.

United States Fish and Wildlife Service

COMMENTS

RESPONSES

that risk the well option was not explored further. John also clarified the position of the sewage treatment ponds. From the description given it would appear that the ponds recharge the same watershed that Annie Creek drains except that the recharge takes place a mile or so below Annie Spring.

1

The lower stretch (outside of the Park's boundary) of Annie Creek forms a connection to Sun Creek which contains a population of Bull trout (*Salvelinus confluentus*). The Bull trout is currently proposed for listing as endangered by the Service. The Endangered Species Act requires that federal agencies conference with the Service on any action that is likely to jeopardize the continuing existence of a proposed species or destroy or adversely modify proposed critical habitat. The Service recommends that since this project may affect the quantity of water available to bull trout downstream (even if it is likely to be beneficial) the park service should informally conference with the Service on the affects of this action to this proposed species

The Service is aware that the Park along with other agencies is involved in the development of a conservation strategy for Bull trout in Sun Creek and connecting waters. John Bowerman of my staff is a part of this cooperative effort and is working closely with the planning team. We encourage the Park to continue this prooess and work toward the long term conservation of this species.

The Service appreciates the opportunity to review and comment on the draft. We appreciate your efforts in this matter and will work with you on threatened and/or endangered species issues as they arise. If you have any questions, please contact Doug Laye at (541)885-8481.

1. The National Park Service has informally conferred with the U.S. Fish and Wildlife Service. This conference resulted in the determination that the proposed plan would not be likely to adversely affect bull trout.

COMMENTS

RESPONSES



PARKS AND RECREATION DEPARTMENT

STATE HISTORIC PRESERVATION OFFICE

January 26, 1998

Superintendent, Crater Lake National Park
P.O. Box 7
Crater Lake, OR 97634

RE: Draft Visitor Services Plan/Environmental Impact Statement
Crater Lake National Park, Klamath County, Oregon

Dear Superintendent:

Thank you for your submission of project documentation for the property(s) referenced above. This information was submitted in compliance with the National Historic Preservation Act of 1966 (16 U.S.C. 470f), Section 106, and reviewed under criteria and procedures outlined in 36 CFR Part 800. Further consultation and comment was also solicited from appropriate SHPO program staff.

We appreciate and support your efforts to stabilize, maintain, and improve facilities, particularly historic resources, at Crater Lake National Park. Improving the visitor experience at the Rim, as well as enhancing protection of resources are important goals. We do, however, have concerns regarding the implementation of Alternative A (Proposed Action) and its impacts in the Rim Village Historic District.

The Rim Village Historic District is designated as a designed historic landscape that is comprised of several features, including several buildings and structures, the circulation system, vegetation, and some small scale features such as benches or masonry details. In aggregate, these features form a single historic resource known as the Rim Village Historic District. As such, the District should be treated not as a group of individual elements, but as a holistic system with interdependent elements. Changes to any one element potentially affect the character of the entire district.

We commend the portions of the proposal which recommend rehabilitation of features such as removal of the non-historic portions of the cafeteria, and stabilization of the parapet wall along the promenade. Would it be possible to expand such rehabilitation efforts to include areas of the features within the District, such as curbing, planting areas, signage, benches and picnic tables, fountains, etc.?

The subject of most concern to us is the redesign of the circulation system in and around the cafeteria plaza area. The circulation system at Rim Village was designed to connect various features to each other while allowing the visitor to experience the Lake. Since the circulation system is integral to the character of the District, it is our opinion that implementation of the proposal as presented would have an "Adverse Effect" on the District as a whole for the following reasons:

Removal of resources and significant changes in the function and appearance of the cafeteria area would clearly compromise the historic integrity of the designed landscape. Removal of parking and traffic from the cafeteria plaza results in a fundamental change in the intended use of the plaza area. We do recognize the legitimate reasons for this proposed change, and understand the desire to minimize vehicular "cluttering" of the area as well as potential vehicle/pedestrian conflicts. In the proposal, however, the historic continuity of circulation between the cafeteria area, the Rim and

1

Oregon Parks and Recreation Department - State Historic Preservation Office

- 1. Although supportive of most elements of the proposed action, the state historic preservation office has determined that implementation of the proposal as stated in the draft plan would have an "Adverse Effect," because removal of resources and significant changes in the function and appearance of the cafeteria plaza area would compromise the historic integrity of the designed landscape in Rim Village Historic District (entered in the National Register of Historic Places on September 18, 1997). The construction of a new parking area to the rear of the cafeteria might have visual impacts on the historic district and would direct visitors to the rear of the building, rather than the front. The construction of a new visitor contact station near the cafeteria building would have a visual effect on the cafeteria plaza and the district as a whole.

There has been a commitment between the Oregon State Historic Preservation Officer, Advisory Council on Historic Preservation and the National Park Service to prepare a programmatic agreement, under the guidelines of section 106 of the National Historic Preservation Act, to ensure that mutually agreeable design mitigating measures are undertaken to resolve the adverse effect that will occur to the Rim Village Historic District due to implementation of the proposed action. Some of the design mitigation measures that will be discussed are use of native vegetation species incorporated in the original designed landscape of the village, utilization of visitor contact station architectural design and materials that are compatible with the historic district, and development of an historically appropriate designed landscape and circulation pattern for the plaza area immediately north of the cafeteria.

COMMENTS

RESPONSES

Superintendent, Crater Lake National Park
January 26, 1998
page 2

the Lodge is broken. Since a new parking area behind the cafeteria is being proposed, perhaps vehicular traffic could be minimized rather than eliminated from the cafeteria plaza. In this way, traffic congestion could be controlled and the historic configuration and function of the area could be retained. This might also allow for a reduction in the size of the new parking area, further minimizing its impact on the District.

Another effect of the construction of a new parking area to the rear of the cafeteria is that visitors will be directed to the rear of the building, rather than the front. Is there a way to direct visitors to enter the building from the front, even if they use a parking area in the rear?

The proposed new parking area, while outside the historic district boundaries, is adjacent to and may have visual impacts on the District. Careful placement, design and use of materials on the new parking area could minimize its impact. As stated above, perhaps retaining the plaza area for limited vehicular use would reduce the necessary size of the new parking area, thus lessening its effect. More information about the proposed design of the parking area would be helpful.

Construction of a new visitor contact station near the cafeteria building will have a visual effect on the cafeteria plaza and the District as a whole. Careful consideration will need to be given to scale, materials and design to minimize the impact of this new building. Are there drawings for the buildings that were proposed to be built near this location, as indicated in the 1932 Master Plan? If so, these might provide some interesting design ideas that could be applied to the new building. Again, more information about this new construction would be helpful to our office in determining its effect on the District.

Thank you for giving us the opportunity to comment on this plan. We are in support of your efforts to maintain and improve upon the facility, and would welcome further discussion on the details of the project. If you should have any further questions, or need additional assistance, please feel free to contact me at the SHPO, extension 229.

Sincerely,



Lisa Carter
Preservation Specialist

cc: Stephanie Toothman, NPS, Seattle
James Hamrick, Deputy State Historic Preservation Officer



**CRATER
LAKE
COMPANY**

January 23, 1998

Al Hendricks, Superintendent
Crater Lake National Park
PO Box 7
Crater Lake, OR 97604

Subject: Draft Visitors Service Plan Environmental Impact Statement

Dear Superintendent Hendricks:

I am responding for Crater Lake, Lodge, Inc. (Company) to the National Park Service (NPS) Draft Visitor Service Plan Environmental Impact Statement (DVSP) for Crater Lake National Park (Park), which I received on December 15, 1997. I am pleased for the opportunity to respond to the DVSP.

Our mission as the concessionaire at the Park is to provide quality guest services which enhance the guests visit to the Park and we do this through our team's commitment to provide guest services which exceed the guest's expectations. We are also committed to supporting NPS in your efforts to preserve the natural and cultural resources of the Park. We strive to minimize or decrease the impact our services have on the natural and cultural resources.

My approach to providing input is based on your alternative "A" (proposed action) and to comment on how we recommend NPS can improve alternative "A".

RIM VILLAGE

Cafeteria/Gift Store Building The cafeteria/gift store building was originally built in the late 1920's to provide food service, convenience store, and gifts. The expanded building today serves many purposes including a cafeteria, gift store, convenience store, seasonal Watchman restaurant, two sleeping rooms, maintenance storage crib and over 10,000 feet in storage for food, beverage, gifts, convenience store, plus office space. It is wonderful NPS wants to preserve the 1920's building and have a concessioner provide fast food, gifts, and convenience store, but by selecting Alternative "A" NPS does not take into account the following:

1. A majority of the food stores, food service supplies, and beverages for the Crater Lake Lodge Dining Room and Team Member Dining Room are stored in the cafeteria/gift store building. There is no room for this storage in the

Crater Lake Company, Crater Lake National Park
1211 Avenue C, White City, OR 97503
Business Office (541) 830-4051 Fax: 541 830-8314
Reservations (541) 830-8700

Crater Lake Company

1. Rim Village has historically been the focal point for visitor services at Crater Lake National Park. As the number of visitors and the commercial facilities and services have grown during the past 40 years, congestion at Rim Village has worsened to the point where it interferes with visitor enjoyment of Crater Lake. The *Visitor Services Plan* would eliminate unnecessary commercial services from Rim Village while continuing those services essential for visitor enjoyment of Crater Lake. A deli/fast food facility would offer good quality, limited menu food service to serve visitors' needs. Likewise the retail operation at Rim Village would offer a limited inventory of gifts, souvenirs and sundries to meet visitor needs. The emphasis would be on gifts and souvenirs related to the park's features, natural values, and interpretive themes. The sale of gifts and souvenirs related to Crater Lake would provide visitors with a tangible memento of their park experience. It is envisioned that the new food service/retail facility would be an efficient, high-volume operation where individual visitors would spend a minimal amount of time.

In planning the food service for the rehabilitated building, the National Park Service consulted with a variety of food service and restaurant industry sources. Based on what was learned from these sources, the National Park Service has determined that there is adequate space for a deli/fast food service in the building. Although specific determinations regarding layout and space allocation will be made when the new facility is designed, it is envisioned that the new fast food area would hold 75 seats. Ample storage space for food products to support the food service operation would be available in the basement of the building. With a limited menu and high turnover of customers, there would be sufficient space for the deli/fast food service.

Storage space for gifts and other retail merchandise would be available both in the attic and the basement of the building. It is

COMMENTS

- lodge. This storage needs to be in close proximity to the lodge for immediate restocking to meet the current dining room guest orders.
2. During the summer we have over \$100,000 in food and beverage products stored in the cafeteria/gift store building. If removing all but the 1920's part of the building, there will not be sufficient space for the services listed in Alternative "A" for this location. Even with the dispersion of visitors to Mazama and on the rim, the space is inadequate for a food service during peak season.
 3. The cost to put a fast food service in the 1920's building will be costly at best and may be impossible due to the construction requirements of a food service, unless NPS changes the building considerably.
 4. At the current time the cafeteria overflows in the summer and the gift and convenience store is sufficiently crowded that the foot traffic slows down significantly. The 1920's wing can not handle the people volume, even with reduced services.
 5. With a fast food operation, people could be encouraged to eat outside, but if this happens an even bigger problem occurs. There is a substantial wind that blows at the Rim a majority of summer afternoons. A significant problem today is controlling the waste paper, food, and plastics outside. They blow all over and we spend a considerable amount of time cleaning up the horseshoe area of the building. Animals normally get to the food and spilled drinks first. This problem will increase with a fast food service operation and when the number of people eating outside increases. The environmental consequences draft section does not deal with the people element of the proposed fast food services in the 1920's part of the building.
 6. The 1920's building lacks sufficient storage to support a food service operation even when using all the 1920's building. It may lack sufficient back-up storage for a retail gift store and convenience store, using all the building. The building would be more appropriate as a visitor contact station with displays and movies. If the 1920's wing is all that remains, we recommend it for a visitor contact station and the proposed new visitor contact station be used for commercial services.
 7. The 1970's addition is structurally sound with a full foundation. It's life expectancy is for an additional 30+ years because of its heavy beam construction.
 8. The 1950's wing appears to be in good shape and will last many more years.
 9. The 1920's wing is in very poor condition and does not have a foundation. We believe this wing, if restored, would require being torn down and rebuilt in a similar manner as Crater Lake Lodge.
 10. We strongly recommend that the 1950's and 1970's wings, which are structurally sound, not be torn down.

2

RESPONSES

expected that 1,635 square feet of floor space would be available for merchandising. Surveys conducted by the National Park Service indicate that the current retail gift store operation is well below the average in NPS areas in terms of sales revenue per square foot. With a more innovative and park related gift/souvenir selection, a concessioner should be able to meet visitor needs and increase the amount of sales revenue per square foot.

In its present configuration, the cafeteria building is not a contributing structure to the Rim Village Historic District because the integrity of the building has been extensively compromised by the additions, made between 1958 and 1972. From an aesthetic and architectural perspective, the structure does not enhance the attractiveness of Rim Village. Many visitors have described the building as "ugly." The newer parts of the facility are from 25 to 40 years old. The entire building is in need of renovation or rehabilitation. At a time when a facility needs extensive rehabilitation, the National Park Service has a responsibility to plan for the current and future needs of park visitors. The rehabilitated 1928 cafeteria building would be a functional facility that would enhance visitors' enjoyment of Crater Lake and meet visitor expectations at Rim Village. With the nonhistoric additions removed, the building would also be an attractive component of the Rim Village Historic District contributing to the preservation of the nation's cultural heritage.

The National Park Service agrees that many visitors will purchase food and take it outside to eat. There is potential for an increased amount of litter. This situation could be mitigated by strategic placement of trash containers and keeping the plaza area neat, clean, and attractive. Also the operator could use a minimum of waste producing products. There would also need to be a continuing effort made to educate visitors. The National Park Service believes that the vast majority of visitors respect Crater Lake National Park and will want to put their waste into trash containers.

COMMENTS

- 1
11. We support building a Mazama Village food service if your studies show it can operationally be run at a profit. With the Mazama Village food service, the Watchman Restaurant would no longer be needed. The Watchman kitchen, office area, and seating area could be converted to a visitor contact station. This would lessen the Environmental Intrusion listed in Alternative "A" and would save considerable tax payer money.
 12. If the 1970s cafeteria wing remains, converting the cafeteria with all its seating to a fast food restaurant would be in order.
 13. The housing for an on-call skilled maintenance worker is located in the cafeteria/gift store building during the Crater Lake Lodge season. Alternative "A" removes this housing. Housing is necessary at Rim Village for timely response to emergency lodge situations. Fifteen to twenty minute trips from the new Mazama Dormitory area is unacceptable.
 14. Alternative "A" without modification, will inconvenience visitors by the relocation of a significant portion of food and retail services to Mazama Village. Visitors entering the Park from the north will especially be inconvenienced.
 15. Alternative "A" will result in an increase in day traffic on the Manson Valley Road. Can this road and pedestrian walkways safely handle the day increases?

RIM DORMITORY

2

A quote from page 95 of the DVSP.

"Crater Lake Lodge, Inc., employs up to 240 people in the summer, including management staff. An employee dormitory on the east side of the village currently provides the majority of seasonal housing and serves some administrative functions. The lack of adequate seasonal housing has been critical and has contributed to high staff turnover and hiring limitations."

The lack of adequate housing is the Company's number one problem and affects our ability to hire and retain quality people. This in turn affects the quality of services we provide.

Since 1995 we have had at times in excess of 130 people living in the Rim dormitory. During the summer months in 1997 we averaged 115 people. We had access to over 70 RV spaces in 1997 which allowed us to relieve some pressure from the dormitory.

We agree with NPS estimates that established the appropriate occupancy of the Rim Dormitory at 86 employees (see page 25 of the September 21, 1992 Briefing Report, Rim Village Redevelopment).

3

RESPONSES

A new, full basement was constructed under Crater Lake Lodge when the rehabilitation project was done in the early 1990s. Support services for the kitchen were designed to be located in the new Great Hall basement, including dry storage, liquor storage, and cold storage. A concessioner might want to consider reorganizing the space allocations in the lodge basement to provide more space for the storage of food, beverages, and food service supplies. Additionally, it is expected that the new maintenance facility at Mazama would contain warehouse space; this would be the receiving point for all freight and truck deliveries. There would be enough storage space at the lodge for one day's dining room food service needs. It is expected that daily deliveries from the warehouse at Mazama would be needed for restocking, both for the lodge dining room and the deli/fast food operation (similar to the current restocking program from the cafeteria to the lodge).

The National Park Service agrees that there is need for an on-call skilled maintenance worker at Crater Lake Lodge for response to emergency situations. The design program for the lodge rehabilitation provided for two rooms on the second floor for employee housing. It was the intent at the time that one room would be occupied by the lodge manager and the other by an on-call skilled maintenance worker. The room assignments at Crater Lake Lodge would be up to a concessioner. However, it appears, that a concessioner might want to consider assigning one of the two rooms at the lodge to an on-call skilled maintenance worker. With the addition of the new Mazama Dormitory complex, the general manager could easily move to an apartment at Mazama.

The plan envisions a contemporary food service and gift store at Rim Village which would meet the needs and expectations of the visiting public in the 21st century. Visitors come to Rim Village to view Crater Lake. The services offered would allow visitors to obtain what they need conveniently and spend most of their time enjoying the spectacular beauty of Crater Lake.

COMMENTS

Alternative "A" calls for the removal of the dormitory. In concept we do not object to this as long as NPS arranges for the Company to be compensated fairly at appraised value for our loss and to take the leadership in providing adequate substitute housing.

I have a problem with the DVSP's failure to adequately address concession housing needs. Housing is the concessioners number one problem and directly affects visitor services. We request the DVSP adequately address concession housing levels.

In order to determine concession housing levels we need to review the number of employees we employ during the summer peak season. Exhibit 1 shows, by month, the number of employees employed by the Company in 1995, 1996, and 1997. The information is accurate. You will note a reduction in the number of employees in peak season 1997 compared to 1995 and 1996. We have worked to improve our profitability and at the same time carry out the Superintendent's request for us to reduce our employee numbers. We continue to look for other possible reductions, however, I do not foresee large numbers of further employee decreases. One of the reasons I do not foresee other employee decreases involves finding ourselves in a precarious situation when the Superintendent asks us to reduce the number of employees, but we ultimately increase staff.

1. We are frequently requested to change the way we deliver our services, an example, includes establishing a second work station for our boat operations at the top of Cleetwood Trail.
2. Also, alternative "A" calls for new services which incrementally will add employees. An example involves a required reservation system for volcano cruises and Mazama Campground.
3. While we are being asked to reduce the number of employees, other NPS employees evaluate our performance and have suggested adding more staff. See exhibit 2, the hand written comments at the bottom. Another example involves the '97 annual report narrative which states in part in the opening paragraph:
"Many problems in delivery of services could be attributed to a shortage of qualified staff."

Although some of the service issues is related to turnover, most of the problem is due to illnesses in an over crowded dormitory and our staffing guidelines. We currently staff most areas for 90 percent of peak volume. Anytime we exceed 90 percent, the lines get longer and the wait for food increases. We try to balance what the Superintendent wants with what his staff demands of us.

4. Alternative "A" and other alternatives call for a restaurant or cafeteria at Mazama Village and a fast food restaurant at Rim Village. This change could affect the total number of employees, but for reviewing housing levels we are suggesting no change.
5. The new campground and volcano cruise reservation system and staffing the Mazama Dormitory will add eight to twelve people (there will need to be

RESPONSES

2. The National Park Service agrees that adequate housing is needed for seasonal concession employees at Crater Lake National Park. The National Park Service is currently undertaking a major project to provide good housing for concession employees. The new Mazama Dormitory is now under construction and will be ready for occupancy in 1999 at the time when the new concession contract is executed. The Mazama Dormitory is located away from visitor use areas and offers modern, comfortable living accommodations. The new facility will replace the 25-year-old Rim Dormitory, which is nearing the end of its useful life.

Although it is important to provide good housing for seasonal concession employees, we do not believe that it is necessary for every seasonal concession employee to reside within Crater Lake National Park. The location currently being used for housing summer employees near Fort Klamath (Crater Lake RV Park and Campground) is an eminently suitable site that offers amenities not available to those who live at Crater Lake. There would also be other locations available outside the park that could serve as housing for concession employees.

A park staff member has conducted a preliminary investigation of available sites outside the park and has found a property for sale with potential for use as concession employee housing and a maintenance facility. The property has a dormitory, kitchen/dining hall, manager's residence, maintenance shop, fueling facility and a number of out buildings. We estimate that the complex would be capable of housing up to 60 employees. The buildings would need some rehabilitation work, but the cost would be far less than developing new facilities within Crater Lake National Park. A concession operator could move forward to acquire property such as this and develop facilities needed for business operations at Crater Lake, rather than relying on tax payer-financed government buildings. Furthermore, the concessioner is unable to pay the fair market value for lease of the buildings currently assigned by the government, and building another dormitory would compound this problem.

COMMENTS

RESPONSES

additional maintenance hours, part time receptionist, housekeeper for public areas, staffing the dormitory food service, security hours etc.)

The following is a summary of our bed needs:

230 seasonal and permanent team members (from August '97 - Exhibit 1).
 +8 needed for new dormitory and reservations
 238
 -13 people who work from the White City office in August
 225
 -20 the average number of commuters for the last two years
 205 beds needed

Alternative "A" on page 19 of the DVSP states in part:

"Additional replacement housing for concession employees would be located outside the park. However, if studies determined that this was not feasible, the construction of up to thirty sites might be authorized for an employee RV/trailer facility near the Mazama Dormitory complex west of OR 62 or the number of beds at Mazama Dormitory would be increased to about 100."

If both the 30 RV sites (45 beds*) and 30 additional beds in the dormitory are provided, that totals an additional 75 beds. In summary:

205 beds needed
 -85 new Mazama Dormitory beds (70 dormitory beds, plus 15 RV beds*)
 120
 -75 additional possible Mazama beds from above
 45 remaining needed beds

Our experience has been that our hiring provides us with an average of 1 1/2 employees per RV site.

The only for sure beds are the 85 (70 beds and 15 beds in the RV area) at the new Mazama dormitory. That leaves 120 needed beds (205 - 85). The DVSP needs to address this problem straight on and not dodge it. The DVSP should provide for 205 beds and then reduce the number of beds if beds are located outside the park.

The suggestion that housing can be located outside the park is ignoring the issue. I have spent the last six months trying to arrange housing outside the park.

Some activities which have occurred includes:

1. Crater Lake Realty has been looking for property for us. They have contacted all the land owners between the Park and Fort Klamath and could not locate anyone who wants to sell, except two parcels. One parcel has the wrong zoning and the other parcel I will comment on below.

2

3. The National Park Service concurs with your comments that the Rim Dormitory is in the Crater Lake Lodge viewshed. We further concur that the site and road to the site should be returned to its natural state after the dormitory building was removed. The *Final Visitor Services Plan* has been revised to provide for restoration of the dormitory site and road to natural conditions.

Removing the Rim Dormitory would greatly improve the view of the park and the Klamath basin for guests staying at Crater Lake Lodge. Vehicle and pedestrian congestion at Rim Village would also be reduced by removing the Rim Dormitory. Employee parking spaces would not be needed at Rim Village because the new contract would require the concessioner to provide a shuttle bus for transportation of employees to Rim Village.

4. Each day during summer there are more than 500 overnight guests staying at the Mazama Village Motor Inn and Mazama Campground. At the present time these guests must travel 7 miles to Rim Village to purchase a meal. Many of these guests have traveled into the park through the North Entrance straight to Mazama Village and are upset when they find out they must drive 7 miles back up the road to eat.

The National Park Service has been told for the past several years that the Watchman Restaurant at Rim Village has been unable to make a profit. The menu has been revamped several times, and there has even been a proposal to close the restaurant. The opportunity for profit would be enhanced by locating the restaurant closer to many potential customers staying at Mazama Village. If the restaurant was located closer to most of its potential customers, it would attract more business and better serve park visitors.

The National Park Service has developed an *Economic Feasibility Study*, which includes an analysis of the potential profitability of a new restaurant at Mazama Village. The study makes the assump-

COMMENTS

RESPONSES

- 2. Eric from the Klamath County Planning Department told me that it would be in his opinion impossible to change the land use in this area to commercial if it is not currently commercial. Doug Adkins at Adkins Engineering in Klamath Falls told me the same thing.
- 3. Crater Lake RV Park and Campground has a commercial zone. The owner may be interested in selling. We had test holes dug for a septic system only to find Klamath County will not approve. See Exhibit 3.
- 4. On our behalf Doug Adkins contacted DEQ In Bend and was told orally that it was doubtful DEQ would approve any kind of variance.
- 5. At the current time Doug Adkins is researching alternative waste water systems. It does not look promising. There is insufficient conditions for a lagoon system like the Park has. The fact that I can not find any NPS documents which acknowledges private housing that could be located outside the park is further support for our position that private housing in any quantity immediately outside the park is unlikely.

2

Based on an NPS 1992 study, free market housing outside the Park cannot meet the projected housing needs without extensive federal funding (U.S. Department of Interior, NPS 1992). Therefore, the cost of out of the Park housing must be added to the cost of Alternative "A" or the cost of in Park housing needs to be added to the cost of Alternative "A".

- 6. Furthermore, if beds are privately found outside the Park, the DVSP should not include those beds because they may not be available to a new concessioner for their employees.

Steve Tedder told me Yellowstone National Park had a similar situation with current concessioners owning beds outside the park and those beds would probably not be available to a new concessioner. I do not know how Yellowstone National Park managed this issue.

Other Rim Village Dormitory concerns. The reason for the removal of the Rim employee dormitory was at the request of former Senator Mark Hatfield. The dormitory is in the Crater Lake Lodge view shed. If this is true then anything less than returning the site and roadway to the site to its natural state is not acceptable. If the view shed is not the reason, then I do not understand why a twenty year old building which has a longer life expectancy is being proposed for removal? It's a sound building.

If Alternative "A's" removal of the dormitory remains, we recommend the following be considered:

3

- 1. Use the dormitory site for company employee parking and company vehicle parking. Yes, there is a shortage of guest parking at the lodge and which Alternative "C" addresses. There will be a further parking shortage when the Rim dormitory and dormitory parking is removed.
- 2. Do not use this area for day bus parking. On busy days we have four to eight buses in Rim Village. The bus is home base for the tour guests with

6

tion that there would be approximately 4,000 square feet for the restaurant operation and that it would be a full service restaurant that would replace the food services removed from Rim Village. Based on the analysis, the National Park Service believes that the new restaurant at Mazama Village would be economically feasible. We both agree on the need for a food service at Mazama Village.

- 5. The 1988 *Development Concept Plan* did allow 40 additional cabin units to be built at Mazama; however, the 1988 plan was superseded by the 1994 *Winter Use Plan* and the 1995 *Development Concept Plan*. The 1994 *Final Winter Use* plan stated: "The preferred winter use plan alternative does not propose an expansion of activities in Mazama Village that would justify the immediate construction of year-round lodging units." The plan proposed "to defer the final decision on lodging until the issue can be reevaluated in the year 2000." The 1995 *Final Development Concept Plan* stated "a year-round lodge (at Mazama Village) would be analyzed as part of a separate decision-making process." The *Record of Decision* for the 1995 development concept plan called for the development of a visitor services plan. The National Park Service has analyzed the issue of year-round lodging in developing this *Final Visitor Services Plan*.

Two of the alternatives in this plan included the development of 40 year-round lodging units at Mazama Village. The proposed action does not include construction of winter overnight lodging, primarily, because there is a lack of demand for winter lodging. Winter lodging needs are appropriately being met by facilities outside the park. The small number of visitors who might use a winter lodging facility in the park does not justify the significant increase in costs associated with constructing winterized lodging units and the additional snow removal that would be needed.

- 6. The need for a commercial laundry to provide clean linen for lodging and food service operations has long been recognized. A commercial laundry was one component of the proposed conces-

COMMENTS

RESPONSES

3 guests continually getting on and off the bus during their short stay. For example, guests eat or buy gifts and return to the bus and remain there or drop off their packages, get a camera, get a coat, walk the Rim path, etc. The bus needs to be close to where the tour guests are located. Logistically, the dormitory site puts the bus far away from the tour guests and the bus driver.

Mazama Village

4 Restaurant/Cafeteria: We concur with the need for a food service at Mazama Village. Our past profitability projections for a food establishment at the location showed a loss, unless it is subsidized. We request a copy of your construction cost estimates for the building and your operational revenue and expense projections. If your projections show the project can be properly debt serviced, plus pay operating expenses, then we are 100 percent supportive.

40 Year-Round Lodging Unit. The biggest surprise in the DVSP was the deletion of forty year-round over-night accommodations. Ever since I started work for the Company in 1991, I have been told by NPS representatives the Company could move ahead and build the forty units. We probably would have built the units if we had not been so close to the end of our contract and unexpectedly made a large investment to reopen Crater Lake Lodge. We request the forty lodging units be added to Alternative "A".

5 Many Park and company decisions were based on having year-round lodging. This includes the Mazama dormitory. The main Mazama dormitory was built for year round usage and cost \$3.6 million dollars in total costs (our estimate) for forty beds. That represents a cost of \$75,000 per bed. The thirty bed outer dormitory cost is \$1.2 million (our estimate). This represents a cost of \$40,000 per bed. The only reason for building the main dormitory for year round occupancy was to support a winter visitor service plan which included as the anchor the forty year-round lodging units. There is no need for a year-round dormitory under Alternative "A" if NPS removes the overnight winter lodging. In essence the DVSP is saying that some current and past NPS staff wasted \$1,400,000.00 (\$75,000-\$40,000x40) in tax payer money in building an unnecessary year-round dormitory. I know the dollar figures are not exact, but I feel they are in the ball park. My estimates include indirect construction cost estimates.

The lodging units are needed. They will be fully occupied in the summer. The January, 1992, Crater Lake Market Assessment Final Report prepared by the Community Planning Workshop, University of Oregon, supports winter lodging as needed to generate a successful winter business. We concur with this 1992 report. We do not understand why NPS ignored this tax payer paid report when reviewing the year-round lodging needs at the park. The lodging is the cornerstone of a successful winter business. The lodging would help support the Mazama restaurant being proposed. The lodging could sufficiently help to make the Mazama restaurant economically feasible.

Crater Lake is one of the most beautiful places I have ever been to in the winter. At the current time most people can not enjoy winter, sun rises, sun sets, the fresh snow fall, the crystal clear night skies, the moon reflecting off the snow at night, cross country

7

sioner central support facility. In 1992 the House-Senate Appropriations Conference Committee requested the National Park Service to review alternatives for lodging and support facility operations. In response to the committee's request, the concessioner support facility was significantly downsized. However, the commercial laundry was still included as part of the smaller facility, along with the maintenance and warehouse functions. Location of a commercial laundry with the lodging units at Mazama Village was never a part of any plan.

It has always been, and continues to be, NPS policy to locate support facilities and employee housing in separate areas away from visitor use areas. This reduces the potential for support activities to impact the visitor experience. The best location for the commercial laundry is in the new maintenance facility near the Mazama Dormitory.

Amendment #11 to the expired concession contract, executed in 1994, authorized the expansion of the Mazama Village Store to provide space for more commercial laundry equipment. The increased laundry capacity was needed to provide clean linen for Crater Lake Lodge. Location of the laundry in the store building was a temporary measure. It was recognized at the time that construction of the maintenance/support facility was not going to happen before the lodge opened, and a place was needed to house the laundry in the interim. Location of the commercial laundry in the permanent concessioner maintenance/support facility has been a part of every plan for the past 10 years.

7. Park Management objectives for the Visitor Services Plan are to minimize the impact of commercial services and to provide only those services that are necessary and appropriate to meet the needs of visitors and enhance their enjoyment of the park. Public laundromats are widely available everywhere, including the surrounding towns and communities in southern Oregon. Travelers on vacation can plan to wash their clothes virtually anywhere

COMMENTS

RESPONSES

5 | skiing in the campground area with a place to get warmed up, etc. The Park needs to accommodate visitors who want to enjoy the beauty of Crater Lake in the winter time.

6 | **Laundry.** The commercial laundry is located in the Mazama store. When the store was expanded to meet the Crater Lake Lodge needs, it was remodeled as a temporary location. The laundry should be located with the year-round lodging units or at Crater Lake Lodge to reduce transportation costs and to provide increased flexibility in having fully productive employees. If I put the laundry in the maintenance building as suggested in Alternative "A", I may not be able to use the employees between loads of linen. If located in the year-round lodging, where between linen loads, guest rooms can be cleaned, corridors swept, etc. I can fully utilize the employee's work hours. I can eliminate the cost of transporting the linen from the Mazama dormitory to Mazama Village Motor Inn and the year-round lodging units.

If I had known the lodging units were going to be deleted, I would never have made the decision to establish a temporary commercial laundry and may not have expanded the Mazama store. The current commercial laundry space would make an excellent small recreational equipment rental area.

7 | **Laundromat.** A minor item, but one that is important to the visiting public. Our prior written input supports the continuation of the laundromat operation. See Exhibit 4, page three. With a majority of the overnight stays at Mazama Village being out of state visitors who are probably on the road for multiple days, they periodically, during their trip need laundromat services.

If space was available, the laundromat needs fifty percent more space and two or three additional machines. It is not unusual to see visitors washing clothes in the middle of the night because they can't get in the laundromat during the evening hours. I understand NPS believes I said the laundromat was not needed and I'm not denying I said it, but Exhibit 4 clearly sets forth the company's position which also is my personal opinion.

CLEETWOOD

8 | We are very supportive of Alternative "A's" inclusion of volcano cruises of varying time lengths and routes to diversify lake experiences a visitor can have.

We disagree with the reduction in tours. We request a minimum sixteen hours daily of boat time carrying passengers on the lake during the peak season, plus an island run, when necessary. The number of boat tours, Exhibit 4, page four, and the top of page five provides 1996 numbers which show we would turn people away with a seven tour schedule.

In 1997 there were twenty seven days when more than 420 visitors (60 passengers X 7 tours) took a volcano cruise. See Exhibit 7 for documentation. Many of these days were together so it would have been difficult for the visitors from around the world to have scheduled their tour on an alternative day. For example, the following dates were consecutive and over 420 visitors went on tours: July 23 - 28 (6 days), August 2 - 6 (5 days), August 11 - 14 (4 days), August 16 - 19 (4 days), etc. We estimate

8

along the route of their trip. Providing public laundry facilities within Crater Lake National Park is a convenience perhaps, but it can hardly be considered a necessary service.

Reducing water consumption and minimizing the amount of detergent and laundry chemicals entering the wastewater disposal system would further the conservation of park resources. Elimination of the coin-operated laundry would serve this purpose, as well as allowing for the expansion of retail merchandise space. Display space for gifts, sundries, groceries, and camper supplies is at a premium. We believe that the opportunity to purchase needed items at the camper store is of greater benefit to most visitors than the opportunity to wash clothes.

8. Under the *Visitor Services Plan's* proposed alternative, the frequency of boat tours would be reduced from nine to seven per day, and an eighth tour would be provided when necessary to pick up passengers from Wizard Island.

Boat tour occupancy percentages for the past two years with a nine tour schedule are shown below:

Month	1996	1997
June	73.4%	77.9%
July	77.4%	75.3%
August	75.9%	85.2%
September	66.7%	67.2%
Yearly average	74.9%	79.3%

You will note that passenger occupancy on the boat tours is well below full capacity. On very few days were more than 90% of the available seats sold. We expect that a seven tour schedule coupled with a reservation system would result in boat tours operating at closer to full capacity. There would likely be a few days when some visitors might not be able to take the boat tour, but this would probably occur infrequently. The reservation system would allow visitors to plan their boat tour in advance, thereby reducing

COMMENTS

over 1,700 visitors in 1997 would have lost out on having a different view of Crater Lake from a volcano cruise. About seven percent of the total 1997 passengers would not have been able to take a volcano cruise if we had operated with seven cruises. At nine cruises daily in 1997 we were able to accommodate on days that we were open all but an estimated 150 visitors over the entire season.

I continue to receive mixed signals from NPS. One of the first directives I was given in 1992 by the Park was to solve the problem of many visitors seeking a volcano cruise and not being able to because all the tickets were sold. Also visitors had long waits. I added two tours per day starting in 1992 during the peak season (55-60 days per year). I adjusted the tour schedule during the mid-day to accommodate when visitors arrived at Cleetwood, I improved the mechanical reliability of the boats, and these actions solved the problem. NPS in the 1992 year-end annual rating narrative (see Exhibit) stated:

"In 1992 the tour boat schedule was expanded to nine tours daily to provide better service. Waiting times for boat tours were shortened, and virtually all visitors wishing to take the boat tour were accommodated". (Emphases added).

Seven tours per day during the six busiest weeks of the peak season will:

1. Recreate the problems the park identified to me in 1992 and asked me to solve. This included long visitor waits.
2. Ration tickets during the busiest time of the season. Even with a reservation system there will be hundreds of disappointed visitors.
3. The eighth and ninth tours daily provide the lowest marginal cost. The concession will experience a reduction in volcano cruise profitability.

There are three main boat issues I am aware of and which NPS is trying to deal with in this planning process. Below are the three issues and my perspective on each.

1. Should there be four boats on Crater Lake?

Primarily environmentalists, including some NPS staff do not want boats on the lake. This is an emotional issue and obviously NPS needs to make the final decision. If your decision is to have boat tours then I encourage you not to compromise the operations.

2. Boats interfere with the view shed!

Our tour boats hug the shore line except in two areas, travel slowly, and leave a very small wake. With the proposed varying trip lengths and travel routes, the interference with the view shed can be further reduced.

I believe the DVSP deals without fact on the view shed issue, but deals with personal prejudices to satisfy personal needs for number one above.

9

RESPONSES

or eliminating their waiting time at Cleetwood. The reservation system would also enable visitors to book tours that are currently undersold. The end result has great potential for a more efficient boat tour operation, both for the passengers and for a concession operator.

The National Park Service has analyzed the profitability of the seven boat tour schedule as part of its *Economic Feasibility Study*. The analysis concludes that a concessioner would not lose a substantial amount of revenue by reducing the number of tours from nine to seven. With lower operating costs, the profitability of the boat tours might even be enhanced for an efficient concession operator.

In 1991 ticket sales for the boat tours were located at the Cleetwood dock. Visitors wishing to take the boat tour hiked 1 mile down the steep trail expecting to go on a boat tour around Crater Lake. If a scheduled tour was full, people had to wait around for the next tour. If all tours were sold out for the day, the visitors had to walk 1 mile back up the steep trail without going on the boat tour. Expanding the tour boat schedule to nine boat tours in 1992 temporarily addressed the problem for the next several years; most visitors wishing to take the boat tour were accommodated. In 1995 visitor complaints and dissatisfaction with the boat tour operation reached an all time high, due in large part to persistent vessel mechanical problems resulting in many days with a four tour schedule. The greatest problem was caused by the location of ticket sales at the dock. Finally, in 1996, the concession operator agreed to sell tickets at the trailhead parking area. The new ticket sales system implemented for the 1996 season worked well. Passengers purchased tickets for the boat tour before hiking down Cleetwood Trail and thus were assured of space on a boat tour departing from the dock at a scheduled time.

COMMENTS

There exists no factual information about view shed interference. In fact, there is proof to the contrary. NPS has boats on the lake. Generally, NPS boats travel faster and travel frequently in the middle of the lake, leaving giant wakes when compared to the wake of a tour boat. I know of no control on the use of NPS boats on the lake to protect the view shed. My boat operations manager, Kevin Richardson, has shared with me his observations on the lack of wake control by NPS boats and shared with me one situation where the NPS boat wake was sufficiently large to cause Kevin difficulty at the Cleetwood dock.

The view shed issue is an emotional issue and not a fact based issue.

3. Cleetwood parking lot crowding.

This is the major issue and one NPS needs to address more aggressively. Reduction of two tours to seven tours daily will not solve the natural resource problem at the parking lot. Even with a 125 car parking lot the problem will not be solved. Why?

A. From page seven of the DVSP it states in part:

"Three quarters of all visitation comes during a five-hour period in the middle of the day (10:00 am to 3:00 pm) . . ."

We concur with the observation. This is the heavy visitation time to Cleetwood. In addition to ticket holders, there are large numbers who walk down to the lake and do not take boat tours. Many of the people who cannot get cruise tickets will hike down to the lake anyway. Last summer we noticed late arrivals who missed the last boat tour tended to hike down the trail.

B. With the seven tour day, the waits are longer which leaves more cars in the Cleetwood parking lot. In talking to our boat crew, they reported on busy consecutive days with one day having nine tours and the next day having seven tours that the waits at Cleetwood Cove were very short on the nine tour day as we were able to accommodate the visitors quicker with nine tours, while the waits exceeded two hours mid-day on the seven tour day. The only way to eliminate this waiting problem is to require 100 percent advance reservations which is not practical and not visitor friendly.

During the open house last year, NPS provided me with boat profit estimates which were thousands of dollars in error (see Exhibit 5). I provided some corrected information and that information is hand written on Exhibit 5. Also at the open house, I requested a copy of the NPS, seven tour schedule impact on the Cleetwood parking lot forecast. I am waiting to receive it.

RESPONSES

We have both recognized that there has been a major problem with overcrowding in the Cleetwood parking area. This problem has continued in 1996 and 1997 even with the new ticket sales system. Reduction in the number of boat tours and implementation of a reservation system would reduce the number of people and vehicles at the Cleetwood parking area. Coupled with an increase in the number of parking spaces to 120, the reduction in boat tours has the potential to resolve the overcrowding problems at Cleetwood. Our objectives are to provide increased visitor safety, reduce environmental impacts, and improve the efficiency of the boat tour operation.

Regarding the concern expressed about the impact of a seven-tour schedule on concession profitability, the *Economic Feasibility Study* indicates that reducing tours from nine to seven will not impact a concessioner's opportunity to operate profitably. Additionally, the primary thrust of the *Visitor Services Plan* is to respond to public input and comments; most of the comments favored a reduction in the number of boat tours and a substantial percentage favored the elimination of boat tours.

9. The National Park Service is preparing a prospectus that calls for a concessioner to provide lodging services, food services, retail merchandising, gasoline sales, a campground, and boat tour operations. Commercial visitor services provided by a concessioner are intended to augment services provided by the National Park Service and to further park management objectives. The concessioner is a key partner with the National Park Service in achieving park management objectives.

The 1998 *Visitor Services Plan* sets the direction for commercial visitor services at Crater Lake National Park. Under the plan, some existing commercial visitor services would be modified to better serve the park visitors. A major objective of the new concession contract is to turn the concepts described in the plan into reality.

COMMENTS

RESPONSES

8

Also, the DVSP states in one section that the new seven tour schedule would be spread out over the day to reduce the Cleetwood Cove parking lot crowding, while in another section the DVSP states this schedule will be condensed to mid-day to provide a clear view shed in the early morning and late afternoon. Please provide me with the proposed schedule. This will allow me the opportunity to provide you with knowledgeable feedback on the impact the schedule will have on the Cleetwood parking lot.

The National Park Service has developed an *Economic Feasibility Study* for the *Draft Visitor Services Plan*. The analysis indicates that a contract based on the direction set forth in the plan would provide a concessioner with a reasonable opportunity to realize a profit on the operation as a whole in recognition of the capital to be invested and the obligations to be assumed. The National Park Service expects to issue the prospectus for the new 15- year concession contract in the late spring of 1998.

OTHER COMMENTS

Environmental Consequences. After reading this section of the DVSP, I interpreted what I read as the concessioner will provide less visitor services. Have I interpreted the results correctly? For example, this section shows the following per day water usage in gallons:

	<u>Rim Village</u>	<u>Mazama Village</u>
Alternative B (no action)	39,300	31,800
Alternative A (proposed action)	<u>34,400</u>	<u>34,000</u>
	4,900 gal. reduction	2,200 gal. increase

Overall: 2,600 gallon daily reduction (4%)

9

Construction Costs. The cost for Alternative "A" is estimated at \$20.6 million. After reviewing this alternative and doing our own estimates, we feel the \$20.6 million understates by several million the costs. We request an analysis of the proposed alternative "A" money needed.

For your information we used the lodge costs including A & E and planning (\$22,500,000) to determine a per foot cost and applied that to our guess of square feet in the remodel projects. We used our guesses at the cost of the main Mazama dormitory (\$3,600,000) to estimate a per foot cost for new construction. We added in our guess-estimates for the road and parking lot construction and the removal and revegetation of the old areas, and added money to buy out the concessioner's possessory interest in the Rim Village buildings. We used your estimates for Cleetwood. We added in a ten percent contingency for the smaller items we did not attempt to estimate.

Operational Costs. John Minle is quoted in the Medford Mail Tribune (see Exhibit 8) as follows:

"The federal government would pay \$10 million of the cost. The \$5 million would come from the concessioner."

I personally said to myself after reading the article that it sounds like it might be reasonable in a fifteen year contract. When I pursued the proposed action, Alternative "A", I began to worry. I could see reductions in revenue from boats, retail at Rim Village, and an increase in operating expenses with boat and campground reservation

COMMENTS

RESPONSES

requirements, etc. You obviously have completed your revenue and expense estimates to determine if the concession can provide \$5 million and still have a reasonable opportunity to make a profit. With what you have proposed, we fail to see how a concessioner can make a reasonable profit. Please provide me with your forecasts. We also took note that your Alternative "A" cost estimate is \$20.6 million and Exhibit 6 identifying money sources lists for \$15 million. Where does the additional \$5.6 million come from?

9

Hospitality Industry Input. The hospitality industry has changed significantly in the last decade. It does not appear that the DVSP document has kept up with the times. Old concepts such as building a new cafeteria at Mazama are dated. There are many more modern food concepts than a cafeteria.

When reviewing the list of planning team members, contributors, and consultants (DVSP, pages 162 - 163), it does not appear to include hospitality industry input from any parties (except myself and I am suspect as the current concessioner representative) with current hospitality food, lodging, and retail management experience. When seeing who you sent the DVSP (DVSP, pages 149 - 151), you are not likely to receive the type of hospitality input comments you need other than this letter.

I recommend you have the DVSP reviewed by appropriate hospitality industry representatives.

Overall Approach. Fred Stockton's comments from his December 30, 1996 letter to you remains crucial. Fred states in part:

"I am concerned by the overall approach used. Will the information gathered provide a true picture of the desires of visitors, the National Public, local communities as well as specific special interest groups? With over 500,000 visitors annually, I question whether or not 500 questionnaires sent out against an interested party mailing list will generate a balanced, statistically reliable, sampling of opinion. I have further concerns that the three public meetings, which were held exclusively in Southern Oregon, will provide a broad enough base of opinion on a majority of the issues addressed in the questionnaire.

The entire Fred Stockton letter is enclosed as Exhibit 8. At the time of the letter, Fred was the President of the Company. Fred's concerns in 1996 are still valid in 1998 and have never been addressed by NPS.

CONCLUSION

We remain excited about this process. We are excited about bidding on a new fifteen year contract.

Our "major" concerns about the proposed action, Alternative "A" are:

12

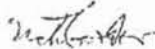
COMMENTS

RESPONSES

9

1. Will the concessioner have a reasonable opportunity to make a profit?
2. The cost estimates to carry out the proposed action seem low. Where does the money come from?
3. Tearing down sound buildings.
4. The deletion of forty year-round lodging units.
5. There is not an inadequate plan for sufficient concessioner employee housing

Yours truly,



Dick Gordon, General Manager
Crater Lake Lodge, Inc.
Vice President, The Recreational Property Group
The Estey Corporation

Enclosure
DG1053/ch

COMMENTS

RESPONSES

The Klamath Tribes

P.O. Box 136
Chiloquish, Oregon 97623
Telephone 541-783-2214
FAX 541-744-5169
FAX (Marketing Dept.) 541-783-5816
800-624-9787

January 17, 1998

Albert J. Hendrick
Superintendent, Crater Lake National Park
P.O. Box 7
Crater Lake, Oregon 97604

Subject: Draft Visitor Service Plan/Environmental Impact Statement

Dear Mr. Hendrick,

This letter is to advise you that the Draft Service Plan/Environmental Report Statement has been reviewed by the Klamath Tribes Planning & Cultural Resource Department and Cultural/Heritage Department offer the following comments regarding the above referred document. The ancestral territory of the Klamath Tribes covered 1,137,794 acres in what is now Klamath and Lake Counties in Oregon and North Central California. These ancestral lands also include the Crater Lake National Park area where the Klamath Tribes maintain a strong and vibrant presence. A harmonious balance between man and nature, which is the fundamental basis of what the Klamath Tribes call "ecosystem management" the Klamath Tribes would like the Draft Visitor Service Plan/Environmental Impact Statement for Crater Lake National Park be revised to include the following items that are acknowledged within the proposed visitor service package plans including: interpretive and cultural educational protocols and interpretive talks by Park staff. Furthermore, it is recommended that future considerations be given towards and employment processes be revised accordingly to give a more accurate picture of the Klamath Tribes.

It is further suggested that any park entrance and service fees be waived for all "registered" Klamath Tribal Members in recognition of their ancestral history of the area surrounding the park area.

In addition, to the issues listed above the following concerns/comments and issues outlined on the attached "exhibit" should be comprehensively addressed within all aspects of the document.

We thank you for the opportunity to review this document and we thank you and your organization in advance for adding our concerns. Should you have any questions feel free to contact this office at your earliest convenience.

Sincerely,


Elwood Miller, Jr.
Natural Resource Director

Sincerely,


Gordon Bettes
Cultural Resource Director

Sincerely,


Gordon Bettes
Cultural Resource Director

Klamath Tribes

- 1. The park will work with the tribes on appropriate interpretation of the Klamath Tribes ancestral use of the area.
- 2. The topic of park entrance and service fees regarding tribal members is beyond the scope of this plan.

COMMENTS

RESPONSES

EXHIBIT

Additional concerns and issues regarding Draft Visitor Services Plan/Environmental Impact Statement.

3	<p>♦ Page 13, paragraph 4: To prevent oil/pollutants from drainage of parking lots, all drainage facilities should be designed to include grease/oil traps to mitigate potential adverse impacts to water quality resources.</p>
4	<p>♦ As noted within the document the water quality of Crater Lake is extremely high, and although the new boat refueling and storage system that is to be installed is double-lined it is recommended that a emergency response plan for fuel containment and disposal of leaking fuels be developed and included within all appropriate alternative proposals to mitigate potentially adverse impacts to the lake's exceptional water quality (as referenced on page 82, paragraph 4-5).</p>
5	<p>♦ Page 70, the last paragraph indicates that conversion of gasoline tour boat motors to electric would mitigate noise and water pollution, none of the proposed development alternatives include statements or directives that such conversion would be required to occur within 5 to 10 years. Revisions of all development alternatives should be provided along with budgetary funds collected over the next 5 to 10 years to bring the conversion about within that 5 to 10 year period.</p>
6	<p>♦ All proposed development alternatives should be revised to include statements and/or directives that any reduction in wildlife habitat, flora or fauna above and beyond the impacts identified, within this document, should be reviewed by the Klamath Tribes and the Klamath Tribes Natural Resource Department.</p>
8	<p>♦ Pages 89-90, within the section regarding prehistoric and ethnographic resources, revisions are suggested to provide clear acknowledgment of Klamath Tribes ancestral use of the region.</p>

3. The potential for stormwater runoff to reach the lake would be reduced by this plan. In general, based on the topography, soil porosity, and the distance of facilities from creeks and streams, water quality would not be expected to be impaired. However, the need for any specific mitigation measures to control potential sources of water pollution would be identified during the project design stage
4. The document has been revised to state that the National Park Service would identify response procedures to address potential fuel spills or leaks.
5. As stated in the document, electric motors or another type of nonpolluting fuel source would be implemented to replace the current gasoline-powered boat engines when alternative technology becomes practicable. Based on the current state of this technology, it appears that this could become a viable option within the next 5 to 10 years. The conversion of gasoline motors to electric motors is not based on funding availability, but on the advancement of the technology. Electric motors need to be powerful enough to operate effectively in the high winds that are periodically encountered on Crater Lake.
6. During the project design stage, when more detailed information is developed, individual construction projects would be evaluated for consistency with the EIS impact evaluation. Should new impacts be identified, further environmental analysis and appropriate NEPA documentation and public involvement would be conducted.
7. The document has been revised to state that the National Park Service will continue to consult with the tribes and maintain open lines of communication regarding the entire spectrum of ethnographic and archeological work in the park during the design process.

COMMENTS

RESPONSES

7

♦ Page 90, within the Ethnographic Resources section the Crater Lake area is identified as a sacred ceremonial resource to regional Native Americans however, no pedestrian walkovers are recommended for areas that will be disturbed and/or developed under the various development proposal alternatives outlined within the document only that the park service will continue to "consult with tribes and maintain" open-lines of communication. It is recommended that the document be comprehensively revised to ensure that under all development scenarios, initial assessments will be conducted to ensure that no sacred resource is disturbed and/or destroyed.

It is further suggested that the Klamath Tribes be allowed to participate in the award process for archeological consultants as well as be allowed to participate within any archeological site assessment process that is to occur within the Crater Lake National Park.

8

The Klamath Tribes have long been recognized by surrounding and neighboring tribes as the tribe that used the Crater Lake area most extensively and had the greatest knowledge which is contrary to first statement within Ethnographic Resource Section of the EIS referring to three (3) other tribes using the area as their aboriginal land holdings. Furthermore it is requested that a copy of referenced Maires et al, 1994 documents be sent to the director of the Klamath Tribes Cultural/Heritage Department for review.

Tribal maps of "ceded lands" which have been acknowledged by other tribes historians included the Crater Lake area as aboriginal territory of the Klamath Tribes.

The Klamath Tribes oral history and legends speak to the creation of the Crater Lake which has been proven scientifically that the Klamath Tribes were the first peoples within the area.

8. The document has been revised to acknowledge the Klamath Tribes use of the Crater lake area. The first two sentences in paragraph 1, page 90 will be revised as follows: "Although three Indian groups bordered the Crater Lake area on the west - Molala, Upper Umpqua, and Takelma - the Klamath Indians, living to the east, have long been recognized as the tribe that used the Crater Lake area most extensively."

National Parks and Conservation Association

PACIFIC REGIONAL OFFICE

26 January 1998

Superintendent Albert Hendricks
Crater Lake National Park
P.O. Box 7
Crater Lake, OR 97604

**RE: CRATER LAKE NATIONAL PARK DRAFT VISITOR SERVICES
PLAN/ENVIRONMENTAL IMPACT STATEMENT**

Dear Superintendent Hendricks:

The National Parks and Conservation Association (NPCA) is America's only private nonprofit citizen's organization dedicated solely to protecting, preserving and enhancing the U.S. National Park System. NPCA was founded in 1919 and currently has over 475,000 members.

Thank you for this opportunity to assist the NPS in determining the "necessary and appropriate" level of visitor services in Crater Lake National Park. We are pleased to see that the park has made a concerted effort to substantially reduce the overbearing concession presence at Rim Village. We noted that the preferred alternative addresses several of our concerns and suggestions from scoping. For example, we appreciate the fact that no new overnight facilities will be constructed that interpretation will be enhanced at the Rim, and that Mazama will be the new "hub" for visitor services, all suggesting a plan which emphasizes park resources.

To further this emphasis, we urge the NPS to define "necessary and appropriate" as that which best protects and showcases the park resources, rather than stressing visitor convenience. This planning process should be seen as a tool for managing visitors consistent with the protection of



Pacific Regional Office
P.O. Box 1289, Oakland, CA 94601-1289
Tel: (510) 839-9922 • Fax: (510) 835-4441

National Office
1776 Mass. Ave., N.W., Washington, D.C. 20036
Tel: (202) 223-6722 • Fax: (202) 659-0650

♻️
PRINTED ON RECYCLED PAPER

National Parks and Conservation Association

COMMENTS

RESPONSES

the park. We think the park would be best served by an alternative that combines elements of alternatives A and C. Please see the following comments for our specific concerns and questions on the proposed alternative.

RIM VILLAGE:

We commend NPS for significantly scaling back the facilities at Rim Village. By removing unnecessary development, it will reduce congestion problems and the likelihood that concession developments will detract from the public's immediate experience of the park's values. In line with our earlier scoping comments, we support the reduction of the scale and range of food service and merchandise at Rim Village. We also support the relocation of the parking lot, the increase in interpretive tools, and the establishment of a visitor center that provides information, interpretation and viewing opportunities.

1	However, we do request clarification on certain components of this alternative. Why is the park building a new visitor center instead of using part of the vacated concession facilities? Also, it
2	appears that the park intends to develop new dormitory facilities for concession employees. Please explain if and how that expense will be offset by fees from the concession company. As we
3	suggested in our scoping comments, no more than basic food supplies should be available at Rim Village. We do not understand the need for a fast food restaurant at Rim Village, particularly when there may be a full service restaurant at Mazama Village seven miles away. Furthermore, a fast food restaurant is likely to increase waste generation, slow parking turnover and encourage congestion in the area.
4	We would also like to reiterate our earlier suggestion to implement a shuttle system, for park and concession employees as well as for park visitors. A shuttle service between Mazama Village and/or outside the park to Rim Village would decrease the need for parking and lessen traffic congestion. The loop road is ideally suited for a shuttle system and it would provide an additional vehicle for park interpretation. This will also provide an alternative to the limited boat tours.

1. A new visitor contact station would be constructed because the rehabilitation of the cafeteria building to its 1928 configuration would not be adequate in size to provide for food services and visitor contact, and views of the lake in the winter would be unavailable due to the one-story architecture of the building.
2. Presently the concessioner is being strongly urged to find and fund additional employee housing outside the park.
3. Fast-food service at Rim Village is deemed necessary to provide for a quicker turnaround time and concomitant fewer parking requirements for cafeteria visitors. This type of food service is also desirable because without it visitors would likely go to the lodge for lunch rather than drive back to Mazama Village. The lodge dining room has limited capacity, and the service is organized for a more leisurely eating experience. The lodge would be unable to accommodate visitors quickly, and long waits for lunch would be the norm during the peak summer months.
4. The concessioner would be required to provide an employee shuttle service between concession housing and the rim to minimize the need for employee parking on the rim. Providing a shuttle system for visitors would require a shuttle fleet with associated storage, maintenance, and additional employees, plus a large parking/staging area(s). The costs and impacts associated with constructing and operating such a system would not be warranted given visitation numbers, the yearly fluctuation in visitation, and adequate capacity of the park roads. In addition, the proposed action encourages shorter visitor stays by reducing commercial services, and it somewhat alters the traffic patterns at Rim Village, thus reducing traffic congestion and the parking demand there.

COMMENTS

RESPONSES

MAZAMA VILLAGE:

We support the shift to make Mazama the primary concession area. However, we do have some

related concerns. As we mentioned in our scoping comments, we believe that NPS should place concession housing and the maintenance facility outside of the park. The document suggests that placing housing outside the park may be deemed infeasible but does not explain why. All feasibility analyses should be concluded prior to development of the plan. The document should explain why this is the case. We also would like a fuller explanation for the relocation of the

amphitheater. Does the more convenient location outweigh the financial costs and resource impacts that would result from the construction of a new facility?

Also, we question the appropriateness of a larger scale restaurant at Mazama to replace the facilities at Rim Village. We do not consider it untenable, but it will require the installation of additional facilities and impacts to the area's resources, including Annie Spring. This being the case, NPS must carefully approach this decision, and discuss why nearby restaurants including places outside the park wouldn't meet this need.

CLEETWOOD:

In general, we think the level of proposed development at Cleetwood is reasonable. We support the modification of the Cleetwood trail insofar as it provides for erosion control and protection of park resources and public safety. We also are pleased to see that the park will continue to consider the implementation of electric boats when the technology is feasible. We also support the reduction in boat tours and scheduling which prevents conflicts with optimal lake viewing times

However, we are concerned about the expense and risk involved with fuel leaks from the boat tours. While we support the park's decision to install a new fuel system that will decrease the risk of fuel line leaks, it is unclear how the NPS will ensure that part of this expense is covered through fees paid by the concessioner? Additionally, because of the ongoing risk of a fuel spill and the potentially serious environmental impact, the park needs to develop an emergency spill plan and require that the concession company post a clean-up bond that would cover the worst

- 5. It is the preference of the National Park Service to locate replacement housing for concession employees outside of the park. However, a feasibility study would be completed to evaluate housing needs. The development of new concession housing within the park would not occur prior to this study, and it would be done only if the study concluded that replacement housing outside of the park was not feasible.
- 6. The proposed action has been revised to state that the existing amphitheater would be retained in its present location.
- 7. The new restaurant at Mazama Village would serve both day users and the overnight visitors staying at the motor inn and campground. This would relieve some of the demand for services and associated parking at Rim Village during the day. Also, this restaurant, being more convenient to overnight visitors, would reduce the amount of traffic to and from the Rim or areas outside of the park.
- 8. See response 3 to Klamath Tribes.

COMMENTS

RESPONSES

8

case scenario. This would provide assurances for NPS and increase the accountability of the concessioner. The bonding requirement can also serve to filter out concession bids by potential operators who would not be able to shoulder the financial responsibility in the event of a fuel spill.

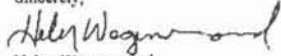
GATEWAY COMMUNITIES:

9

In the "Issues and Concerns" section, the document raises the question as to whether certain facilities, such as the gift store at Rim Village or services that are currently being transferred to Mazama Village might in fact be located outside the park. Yet, the document does not subsequently discuss these options except in the case of concession housing. The document needs to analyze these issues in greater detail, including the potential for benefit or harm to the local economy.

Thank you again for this opportunity to provide input into the planning process. Please do not hesitate to call with any questions or comments and please keep us updated on all future developments.

Sincerely,



Helen Wagenvoord
Pacific Regional Office

9. See response 7 above. In the case of gift and sundry sales, space for these items would become available within the existing camper store with the removal of the laundry facilities. Limited sale of these items was considered appropriate, particularly given the availability of space. Gifts would be limited to those related to Crater Lake.

COMMENTS

RESPONSES

P.O. Box 128
 Fort Klamath, OR 97626
 January 21, 1988

Subject: Draft Visitor Services Plan
 Environmental Impact Statement
 Crater Lake National Park, Oregon

Dear Sirs:

The residents of Fort Klamath and Wood River Valley have some concerns about the planning for Crater Lake that was initiated in September 1986. A number of the local citizens responded to your request for input. We would still appreciate some answers to the following:

1. Where will the Park obtain the potable water to accommodate the increased number of visitors?
2. Much more importantly, where will the sewage be treated? Our concern to this question relates to the drainage of the sewage which now drains to Munson Valley which drains on to the Wood River Valley floor where approximately 100 families reside and depend on ground water for their homes.
3. Since the concern for oil from car parking at the Lake rim and that oil is being plowed to the rim edge in the snow, we suggest that the snow be plowed away from the rim--a single row. Leave the parking area as is.
4. If the concessionaire is to provide portable toilets at strategic spots, he should provide enough for the current number of people that visit the park. In the past, this has not been the case, and those toilets have been allowed to overflow.
5. If the concern is pollution of the Lake, get those gasoline powered boats off the lake until a different source of power is available.

The original purpose of establishing national park was not to enlarge concessions for sleeping, launching, shopping. THE ORIGINAL PURPOSE OF ALL NATIONAL PARKS WAS TO KEEP THE SPECIFIED AREA PRISTINE FOR EVERYONE FOR ALL TIME. We would like to see Crater Lake kept as pristine as possible.

Sincerely,
 The C.I. Club
 The Fort Klamath Community
 Citizens of Wood River Valley

cc
 Bruce Barbit, Dept. of Interior, Washington, DC 20540
 Al Hendrike, Supt., CLNP, Box 7, Crater Lake, Oregon 97604
 Sen. Ron Wyden, 259 Russell Senate Office Bldg, Washington DC 20510
 Sen Gordon Smith, 9 343 Dirksen Senate Office Bldg, Washington DC 20510
 Rep. Bob Smith, District 2, 1126 Longworth House Office Bldg
 Washington DC 20515

Civic Improvement Club

1. Water for park use would continue to be supplied from Annie Spring. Water demand is expected to decrease compared to existing levels because of an overall reduction in food services, employee housing, and public laundry facilities.
2. Sewage from existing and proposed facilities would continue to be treated at existing sewage lagoons at Munson Valley and Mazama Village. These lagoons were upgraded and their capacity increased in the early 1990s. They meet all applicable state and federal wastewater treatment and disposal regulations and have sufficient capacity to process wastewater from all existing and proposed facilities.
3. The prevailing winter winds in the Rim Village area blow snow toward the lake. Consequently, snow is predominantly plowed or blown toward the rim to minimize drifting of snow back across the cafeteria parking area. Removing the existing cafeteria parking area would also have other benefits in addition to decreasing the possibility of stormwater runoff or contaminated snow from entering the lake. Vehicles and traffic congestion would be eliminated along the rim north of the proposed visitor contact facility and cafeteria building, when that parking lot is converted to pedestrian space.
4. Proposed restroom facilities at Rim Village and Mazama Village would be sized to accommodate expected usage and would be connected to the existing sewage system. Composting / vault toilets would be constructed at Cleetwood to replace the existing portable toilets.
5. The National Park Service supports continuation of the boat tours as an appropriate interpretive experience for visitors. A new fuel system would be installed to reduce the potential for fuel line leaks. Although exhausts from boats would continue, existing

COMMENTS

RESPONSES

January 20, 1998

P.O. Box 455
Fort Klumath, OR 97626

Mr. Albert J. Hendricks
Superintendent, Crater Lake National Park
P.O. Box 7
Crater Lake, OR 97604

Dear : Mr. Hendricks

Subject: Draft Visitors Services Plan/Environmental Impact Statement

We have reviewed the Draft Visitors Plan/Environmental Impact Statement (DVP/EIS), and have the following comments.

Commercial Services. We strongly support reducing commercial services and staffing within the park, and believe that the objectives of the National Park Service (NPS) as stated on page 11 will be best served through preservation of the park's natural environment. Commercialization and development of the park will significantly detract from the public's ability to enjoy the natural beauty of the park. We do not need or want a "Disneyland" experience at Crater Lake National Park!

Improvements required to maintain minimum levels of concessions in the park should be borne by the concessionaire, not us taxpayers. Visitor facilities should be minimized; it is not necessary to provide facilities that support long stays within the park. These services are all available outside the park within reasonable driving distances.

Mazama Village. We support the actions described in Alternative C, which include conversion of the existing motel to concession housing, and elimination of the public laundry and showers. We do not support the construction of additional group camping sites. Any group sites will significantly increase the density of campers in the area, and should be avoided. If group camping is to be constructed, it should be done with a commensurate reduction in the number of individual spaces.

Construction and operation of a new laundry must be compatible with the existing wastewater treatment and disposal system. The DVP/EIS is silent regarding impacts to the existing wastewater system, and must be considered inadequate unless these issues are addressed. We do not support any development that can not be accommodated by the

Elmore E. and Mary Nicholson

1. See response 2 to the C.I. Club.

1

COMMENTS

RESPONSES

Superintendent, Crater Lake National Park
Page 2
January 20, 1998

- | | |
|---|---|
| 1 | current wastewater treatment system, or any development that negatively impacts water quality in Annie Creek in any way. |
| 2 | Cleetwood Cove. We support elimination of all boat tours on the lake and removal of the boats and fuel system. This will avoid the need to mitigate possible fuel spills and pollution from operation of the boats. These tours are use by only a small fraction of the visitors to the park, and should be eliminated. Tours on the lake could be revisited when technology has advanced enough to provide electric or other clean methods of propelling tour boats. We support leaving the trail so that those who wish to hike down to the lake can do so, and support Alternative C in this regard. |
| 3 | <p>Water Resources. The DVP/EIS states that the NPS completed the <i>Final Development Concept Plan/Amendment to the General Management Plan/Environmental Impact Statement</i>, and that the document was never approved. During review of that document, we had several comments and questions regarding water rights and water use at the Park which were not adequately responded to. The NPS does not have any firm water rights to Annie Creek or any of its tributaries, which we believe must be resolved before any further planning and development within the park that affects this water use are implemented. This letter includes similar questions, which we request be answered before any action described in this plan is implemented. We <u>AGAIN</u> request that the NPS provide specific answers to the following questions:</p> <ol style="list-style-type: none"> 1. What specific rules, regulations, or actions does the NPS propose to implement to protect the priority and later water rights of water users in the Fort Klamath valley? 2. How will water for current and proposed developments be measured, such that water use during drought conditions can be regulated? 3. Will the NPS cease diversions from Annie Springs and use of Annie Creek water during drought years? This was required of downstream water users in 1992 and 1994 who have higher priority rights than the park. 4. Will the NPS compensate down stream water rights holders if water use within the park affects water use within the valley? 5. Will the NPS bear the costs of additional management, flow monitoring, or physical structures required to protect the rights of downstream water rights holders due to use of water by the park? 6. Has the NPS evaluated alternative water supplies for park operations that would eliminate the use of unauthorized water from Annie Creek? If so, what were the conclusions of those studies? Is the NPS going to implement any actions to reduce its water use? |

2. See response 5 to the C.I. Club.
3. From the earliest water right permit issuance for surface waters in the Klamath Basin, the state of Oregon had never included federal reserved water rights in its decisions. As a result, the amount and priority date of these federal reserved water rights are, as yet, undetermined. Relative priority dates have not yet been decreed.

To correct the situation in which federal reserved water rights were not considered in the assignment of other basin water rights, the state of Oregon initiated the Klamath Basin Adjudication. Following the schedule established by the state, the National Park Service filed claims for federal reserved water rights in 1997. As submitted, the federal water rights claimed would provide for planned present and future consumptive water needs at the park even in years which match the lowest recorded flow conditions. Claims were also filed for stream flow levels to maintain natural processes, and the natural water levels in Crater Lake. The adjudication process will provide the answer to the relative priority date question, mentioned in the previous paragraph.

Concurrently, the state has initiated an Alternative Dispute Resolution (ADR) process in an attempt to identify and resolve disputes regarding water right claims filed in the Klamath Adjudication. The National Park Service is participating in the ADR process. To the extent that it is possible, the National Park Service desires to reach mutually acceptable settlement(s) with the individuals and groups participating in the ADR process regarding the nature and extent of water use for Klamath Basin streams which originate within the park.

The National Park Service believes the Adjudication process will confirm that adequate water rights are held by the federal government to provide for the usage levels envisioned by the Visitor Services Plan. The National Park Service is willing to pursue alternatives that would obviate the need to wait for a final decision in the adjudication, which may take several years.

COMMENTS

RESPONSES

Superintendent, Crater Lake National Park
Page 3
January 20, 1998

7. Does the NPS intend to continue to develop park facilities and use water from Annie Creek without resolution of (and apparently in spite of) the questions raised by water rights holders in the Fort Klamath valley? We are compelled to ask this question because your responses to our comments about water rights in our letter on the *Final Development Concept Plan/Amendment to the General Management Plan/Environmental Impact Statement* did not even attempt to answer these important concerns. In many cases, your response was to state that our comments were "noted," and provided no explanation or further response.

We previously requested that the NPS delay planning and implementation of improvements in the Park until the issue of water rights and water use were settled. Your response (in the *Final Development Concept Plan/Amendment to the General Management Plan/Environmental Impact Statement*) was that "To delay planning activities in the park until this process is complete would be an unreasonable constraint on park operations." We strongly object to that statement, and offer that it is completely unreasonable to continue planning and implementation of facilities within the park before the issue of water rights are settled. The NPS appears to have a callus disregard of the rights and concerns of water users in the Fort Klamath valley and has chosen to ignore this fundamental issue! It is an unacceptable use of public funds to continue to plan and develop facilities that use water for which the Park has no secure water right.

General Comments.

Implementation of any of the alternatives or combinations of alternatives described in the DVP/EIS will influence the overall development and scope of long-range improvements in the Park. How the actions described in the DVP/EIS will affect long-range planning and improvements has not been made clear. For example, construction of new parking lots or visitor facilities near the Rim may bias future considerations of park improvements, and result in more concentrated facilities in those areas. It is inappropriate to request that the public comment on the alternatives described in the DVP/EIS without clearly explaining how they relate to long-term plans.

We request that the answers to these questions be provided in a revised DVP/EIS or supplement, and that the public be allowed to comment on how these proposed actions affect the long-term use and enjoyment of the Park. The fact that the *Final Development Concept Plan/Amendment to the General Management Plan/Environmental Impact Statement* was never approved is evidence that the long-range plan for the park is still unclear. We strongly object to continued evaluation and implementation of development plans in the absence of a finalized plan that should provide the over-arching guidance from which to evaluate specific actions.

The National Park Service does not believe that drilling for ground water sources to supplement or supplant current surface water sources, is an appropriate alternative. Potential impairment to park geothermal resources is antithetical to the purpose for which the park was established.

Finally, the National Park Service recognizes that restrictions to its water use may be necessary, should water flows fall below the amount available on whatever the priority date established by the state of Oregon adjudication process. This could result in a reduction of visitor services to meet water availability, or the closure of the park for the period of time that permitted water flows were insufficient to meet any consumptive use needs.

3

COMMENTS

RESPONSES

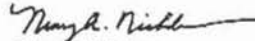
Superintendent, Crater Lake National Park
Page 4
January 20, 1998

We appreciate the opportunity to participate in the planning process to determine what improvements, if any, are made at Crater Lake National Park. We request that we be directly included in any correspondence regarding implementation of this plan or notifications about any other proposed actions or studies. Please contact us directly at 541-381-2329 if you have any questions or would like to discuss the contents of this letter.

Sincerely,



Elmore E. Nicholson



Mary A. Nicholson

Senator Gordon Smith
Congressmen Bob Smith
Senator Neil Bryant
Representative Dennis Luke

COMMENTS

RESPONSES

Superintendent
Crater Lake National Park
P O Box 7
Crater Lake, OR 97064

1/24/98

RE: Comments on the Draft Visitor Services Plan / Environmental Impact Statement

Dear Sir:

My wife and I have reviewed the Draft report and offer our comments.

A Concern We did not see the issue of people with disabilities addressed. This may be incorporated in other planning documents which specify handicapped parking and other access requirements. However, we wish to voice our concern that it appears there will be unavoidable impacts in the various alternatives without specific attention to the issue.

Alternative A (Proposed Action) Rim Village - Our concern (above) is that some visitors will have difficulty getting between the facilities which are widely separated and they may need to have access to handicapped parking in several locations. There is parking fairly close to the rehabilitated cafeteria, but not to the new visitor center. The Kiser Studio and Sinnott Memorial need separate handicapped parking as would the Lodge.

Similar attention to handicapped parking is needed at Mazama Village and Munson Valley, but this may be less of a problem at Cleetwood.

Alternative C This alternative creates more impacts for our concern at Rim Village which suggests that this alternative will limit adequate access to those with handicaps. The same appears true for the amphitheater at Mazama Village which does not have adjacent parking.

Alternative D The impacts appear even more severe at Rim Village with this alternative. However, at Mazama Village the situation is similar to Alternative A.

We see an advantage for the year-round lodging with this alternative.

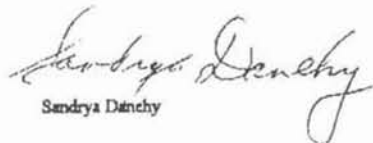
Alternative E The Rim Village situation is similar to Alternative D.

We support Alternative A with regard to the activities proposed at Rim Village for Visitor Contact, Interpretive Program, Sinnott Memorial, Kiser Studio, and N.H.A. sales.

We appreciate the opportunity to comment.

Sincerely,


Edward Danchy


Sandrya Danchy

Edward and Sandrya Danchy

1. The document has been revised to address access for people with disabilities.

COMMENTS

RESPONSES

Superintendent Al Hendricks
Crater Lake National Park
P.O. Box 7
Crater Lake, OR 97604

06-Jan-1998

Subject: Draft Visitor Services Plan / Environmental Impact Statement

Dear Supt. Hendricks:

I wish to offer the following comments regarding the Draft Visitor Services Plan / Environmental Impact Statement. In general, I support a merger of elements from Alternatives A and C.

The biggest complaint that I have regarding Alternative A is the continuation of, what I feel, is an excessive level of concessioner services in the park, most notably the proposal to construct a restaurant at Mazama Village. This latter action is entirely inappropriate and should be reconsidered in the final plan.

- | | |
|---|--|
| 1 | The construction of a restaurant at Mazama Village would result in increased water demands from Annie Spring, thus reducing peak summer flows downstream, which in turn impacts any existing or planned reintroduction of bull trout in Annie Creek. Its presence would produce a health risk to campers due to human-black bear encounters. Even if stringent sanitation practices are employed by the concessioner, the odors of cooked food would be sufficient to attract bears from miles - placing them in direct conflict with people camping in the adjacent campground. The restaurant would also result in the unnecessary loss of vegetation for an expanded parking lot, its structure and associated support facilities (loading area, dumpsters, etc.) This restaurant would further increase the level of development of Mazama Village -- a cumulative impact from development of the nearby concessioner dormitory, employee RV sites, group camp sites, new amphitheater. A new restaurant would also clearly violate the objectives outlined in The Vail Agenda where: "The National Park Service should minimize the development of facilities within park boundaries..." and "Facilities that are purely for the convenience of visitors should be provided by the private sector in gateway communities." Where is the justification or need for this facility in the park? Just because a cafe has historically been provided at Rim Village, that does not automatically determine a need for a replacement facility in Mazama Village. Finally, there is the cost issue -- not just the up-front costs of building this facility, but the ongoing maintenance of yet another building in the park, and the increase in demand for parking at Mazama Village, etc. I do not feel the Draft VSP/EIS has given adequate analysis to the extensive impacts the construction of this restaurant would have on the Mazama Village area and the park and these impacts should be explored further and documented in the Final VSP/EIS before a decision is made. |
| 2 | |
| 3 | |
| 4 | |
| 5 | One other element that should be documented in detail in the Final VSP/EIS is a discussion of the projected water usage for the four Alternatives, much like that which was presented in the 1995 Final DCP/amended GMP/EIS. I am confused by your numbers. In the 1995 Final, the selected alternative (4) showed a usage of 88,400 gpd (page 4-74). Under the Draft VSP/EIS, the No Action alternative shows usage of 84,300 gpd (page 112). The Draft VSP/EIS No Action differs from the 1995 Alternative 4 in that the No Action does not call for a new Rim parking garage (-7,000 gpd) and no new activity center (-14,060 gpd). So why isn't the projected water usage for the Draft VSP/EIS No Action: 88,400 - 7,000 - 14,060 = 67,340 gpd? This is nearly a 25% reduction in water usage. |

Randall Payne

1. Although the projected water demand at Mazama Village is expected to increase, the total projected water demand from Annie Creek (which also includes Rim Village and Munson Valley) is expected to decrease due to an overall reduction in facilities and services. The proposed action would not be likely to adversely affect bull trout.
2. The document acknowledges that development in areas used by bears would increase the risk of incidents between bears and humans. At Mazama Village bears have been a problem in the campground and could be an occasional problem at new facilities. Outside cooking and storage of food in the campground would still likely be the primary source of conflicts.
3. See response 7 to the National Parks and Conservation Association.
4. The document adequately recognizes and evaluates the impacts associated with construction of a new restaurant at Mazama Village, including the cumulative effects of existing development.
5. The commenter's calculations do not accurately reflect the facilities that would exist under the no-action alternative. For instance, the dormitory would remain on the rim under the no-action alternative. Additionally, more recent water demand figures have been used based on actual water usage figures obtained since the opening of the Crater Lake lodge in 1995.

As stated in response 1, although the projected water demand at Mazama Village is expected to increase, the total projected water demand from Annie Creek (which also includes Rim Village and Munson Valley) is expected to decrease due to an overall reduction in facilities and services. Total food service capacity, employee housing, and laundry capacity would decrease, as would their respective water demands.

COMMENTS

RESPONSES

5

from the proposed alternative! Why is the projected No Action usage at Rim Village set at 39,300 gpd, when the 1995 Final Rim projections is only 24,511 gpd? (existing: 18,151 + Lodge: 17,360 - Dorm: 11,000) I am also puzzled how the Draft VSP/EIS preferred alternative value of 79,300 gpd was determined. A Rim Village with a cafeteria, two comfort stations, new visitor contact station, plus the lodge (and with dorm removed) should be comparable to the 1995 Final (minus the parking garage) of 38,571 gpd (existing: 18,151 + Lodge: 17,360 + new developments (guesstimated): 14,060 - Dorm: 11,000), not the 34,400 gpd (page 103) you project. In addition, with the addition of a new restaurant at Mazama Village (no water usage values given, but a conservative guesstimate of 10,000 gpd), group campsites (no guesstimate on water usage), and elimination of laundry (no water usage values given, but a liberal guesstimate would be -4,000 gpd), again taking the 1995 Final Alternative 4 numbers (29,417 gpd), the projected Mazama Village water usage for the Draft VSP/EIS preferred alternative would be much closer to 35,417 gpd (29,417 + 10,000 - 4,000). Add the numbers up and I get total average daily summer water usage for the preferred alternative to be: 84,888 gpd. Still below the allowable water right threshold, but actually an increase over the existing water utilization. Please elaborate where my calculations are in error. The bottom line is, I continue to have concerns regarding the increasing human demand for removing water from Annie Creek to the detriment of streamside vegetation and aquatic organisms (including bull trout). The 1995 Final selected alternative already resulted in a 21,000 gpd increase in water use over existing levels; I remain concerned that proposed Rim and Mazama Village developments in this Draft VSP/EIS will increase that level even more - a cumulative affect.

6

In general, I feel the biggest flaw with Alternative A lies in the level of construction and accompanying visitor services that will be permitted in the park. Besides the aforementioned new restaurant, we have a new Visitor Contact Station at Rim Village, a renovated Cafeteria Building and a renovated Community House, a new amphitheater and group campsites, new employee RV park or expanded Mazama Dormitory, new concession facility at Cleetwood rim and new bulkhead/dock and "shade structure" at Cleetwood Cove. And here I was lead to believe that Park Service funding was chronically tight, but it would appear hiring more interpreters or researchers doesn't have the funding priorities or sex appeal of having new and better buildings in the park. That's where the elements of Alternative C come in. While I recognize the historical significance of the Community House and the original Cafeteria Building, maintaining three buildings at Rim Village, where one dual purpose Visitor Center would do nicely. Dual, as in interpretation and education - NOT entertainment and recreation. An energy efficient, universally accessible, year-round Rim Visitor Center, yet built in the Rustic style, though utilizing recycled products (plastics) and reused materials (building stones or other salvaged items from the old Cafeteria Building and Community House). A Rim Visitor Center which would compliment Crater Lake Lodge, Kiser Studio, and Sinnott Memorial would be a far better investment than an undersized visitor contact station adjacent to a rehabilitated cafeteria building and a seasonal-only community house. A long Visitor Center, whose design criteria is solely for the display of state-of-the-art visitor exhibits, visitor information, NHA sales, a year-round auditorium (so even winter visitors can get in out of the elements and watch a movie or slide show about the park, in addition to summer-time evening talks), and year-round viewing of the lake makes the greatest amount of sense and a wise use of precious funding resources for many years to come. And, it achieves two Vail Agenda objectives of providing facilities "consistent with the mission conveying each individual park unit's significance to the public" and an investment "in innovative expansions of its ability to provide interpretation that enhances visitor enjoyment and enlightenment", plus you save money too in the long run. If on the other hand, you decide to retain the Community House, at least restore it to its original appearance with a porch on the north side of the building.

6. There is some new construction that will occur in Alternative A, but not to the level that was proposed in the draft document. A new amphitheater will not be constructed and it is unlikely that a new expanded Mazama Dormitory or new employee RV park will be built in the park. Additional concession employee housing that will be required upon removal of the Rim Dormitory will probably be situated outside the park in order to minimize the proposed development costs and to avert degradation to some of the natural resources at Mazama Village (for additional discussion refer to comment 2 in the response to Crater Lake Company). At Rim Village the restoration of the cafeteria building to its 1928 size and configuration and the renovation of the community house to its 1930s appearance will be compatible with the historic designed landscape and will provide efficient necessary visitor services. The proposed visitor contact station design may recommend utilization of some recycled materials from the existing cafeteria building, and it will be compatible with the other historic buildings of Rim Village. The idea of a medium sized visitor contact station is to provide the necessary visitor information, orientation, and interpretation, but not to unduly retain visitors at the facility. The intent is to encourage park visitors to move outside to see Rim Village and other resources of the park.

COMMENTS

RESPONSES

7

So, my alternative would be to continue with the plans to re-route the Rim Village Drive as planned in Alternative A with parking 'out back' (I very much like your proposal in this regard). The one element that I feel was not articulated in the Draft VSP/EIS was a discussion on the parking capacity at Rim Village. According to the National Parks and Recreation Act of 1978 (P. L. 95-625) and National Park Service Management Policies, a carrying capacity analysis needs to be developed for every management zone. Unless I missed it, I did not see references to a capacity analysis that arrived at the number of parking spaces allowed at the new parking lot, along the remnants of Rim Village Drive, and the new bus parking area on the site of the old Rim Dormitory. In fact, I don't recall the preferred alternative stating how many parking spaces would be provided at Rim Village. This oversight (or my vision) should be corrected in the Final VSP/EIS.

Anyway, the new Rim Visitor Center would sit on the footprint of the existing cafeteria building (same orientation too to 'hide' the parking area behind the building). An indoor restroom would be provided along with retention of the existing plaza comfort station (summer use). The community house would be removed and the site revegetated. The only concessioner services at Rim Village would be at Crater Lake Lodge, period. Without visitors having easy access to Fritos, french fries, and peanuts from a rim cafeteria/grocery store, maybe the occurrences of visitors feeding wildlife will diminish to some extent. The remaining elements of Alternative A would be implemented as proposed.

My alternative for Mazama Village would be identical to Alternative A, minus the hideous new restaurant and parking lot expansion. I agree the shower facilities should remain - after a few days hiking in the park, a shower is an essential service and a certainly a blessing to your fellow park visitors.

At Cleetwood, once again, the permanent concession facility should be the barest minimum to provide ticket sales - no food and sundry sales. And the idea for a "shade structure" is clearly "for the convenience of visitors" and must certainly should not be built. Clearly, boat tour participants are exposed to the elements simply getting to Cleetwood Cove, and has been the case for decades, visitors have managed quite well without one.

And lastly, at Munson Valley. While I still like the idea of adaptively re-using the existing Steel Information Center as a year-round museum documenting the historical aspects of the park (both Rim Village, but also Munson Valley's historic past as Government Camp; this would allow the new Rim Visitor Center to devote its message solely to the natural history of the park), if that is not permitted I am more of the mind to eliminate Steel Information Center from any public use and dedicate it solely for administrative purposes. Once again, with a decent year-round Rim Visitor Center, there simply is no need to maintain a backup winter contact station/post office in Munson Valley.

8

There is one additional element missing from any of the alternatives - that being no discussion on transportation alternatives other than the automobile. Lots of energetic plans to pave paradise by putting in and expanding parking lots, but nothing about creative uses of shuttle buses. This is most unfortunate since the Record of Decision for the 1995 Final DCP/amended GMP/EIS stated "the National Park Service will carefully analyze all rim area parking needs (that carrying capacity issue again), parking configurations, site options, and shuttle bus system proposals." How about mandating Crater Lake Lodge employees to use a concessioner shuttle bus/van, thus eliminating the need for more parking capacity at the Rim and reducing vehicle traffic to/from the rim? If advanced reservations are being proposed for the boat tour, how about letting the concessioner offer a van ride from Mazama Village to Cleetwood (and back), so folks staying at the campground who have a boat reservation can hop on the van for the tour rather than drive their vehicles to Cleetwood? What about park employees working at the Rim - can they

7. Parking is presently adequate at Rim Village. Although it is congested and crowded at times, there are adequate spaces. In the proposed action, the 150-car parking space north of the cafeteria building would be eliminated and would be replaced with a parking lot to accommodate 95-105 vehicles south of the remodeled building. The significantly smaller size of the cafeteria building, coupled with a fast food service and greatly reduced gift sales, would reduce the time visitors spend at the facility.

The proposed south parking lot should be adequately sized to accommodate visitor use; however, a more detailed analysis will be performed at the design stage.

8. See response 4 to the National Parks and Conservation Association comments regarding employee and public transportation systems.

COMMENTS

RESPONSES

8

'pool it' from Munson Valley to reduce parking demand? I mentioned in my scoping letter, what about a winter-time shuttle from Mazama Village to Rim Village (with a stop at Munson Valley) so that folks wouldn't have to drive to the Rim, thus reducing winter road damage from studded tires as well as the parking lot snow removal budget.

Thank you for taking my comments into consideration. I wish to remain on your mailing list so that I may have additional opportunities to participate in your planning process.

Sincerely,



Randall D. Payne

COMMENTS

January 17, 1998

Superintendent
Crater Lake National Park
P.O. Box 7
Crater Lake, OR 97530

Dear Mr. Hendricks:

Thank you for sending me a copy of Crater Lake's newest Master Plan. After a careful review I have several comments and concerns that I want to share with the design team before they continue on with the Park's development plan.

I have had a long association with Crater Lake National Park having started as a seasonal employee in 1961. For 23 seasons I worked on maintenance and as a ranger in law enforcement and park dispatch, and I also collected fees at the entrance stations and campground for several seasons. Seven summers were spent in interpretation on the boats (95 boat rides), at the visitor centers and giving evening programs. Presently I am "working" as a VIP both during the winter and the summer seasons. I have coauthored two books on Crater Lake.

Considering the positions I have held at Crater Lake I feel I have an excellent understanding of how the Park works. In addition to my years of experience at Crater Lake National Park, I have visited over 100 National Park areas from Alaska to Florida.

Rim Village

Glad to see the NPS is again using the word "Comfort Station." The term has so much more class and historic value than "restroom".

I am really excited about the removal and relocation of the big Rim Parking Lot and the new design for pedestrian promenades and walkways. For years the main Rim Village parking lot has been kept clear of snow by blowing the excess into the Caldera. That option will not be available when the parking lot is moved to below the Cafeteria. The snow cannot just be blown into the surrounding forest without destroying 400 year old Mountain Hemlocks. Preserving those huge and ancient trees is going to be an ecological nightmare. A great deal of planning will be required to solve the new parking lot's snow problem.

Reducing the Lodge access road to a narrow road running between the old stone comfort station and the new pedestrian plaza/visitor center still mingles pedestrians traffic in with auto traffic. Because of the steep climb coming up from the lower parking lot, the grade is going to be a killer during the winter.

RESPONSES

Larry Smith

1. The issue is valid regarding the damage or destruction of some 400 year old mountain hemlocks due to snow blowing operations for the proposed parking lot south of the cafeteria building. Careful design (e.g., parking lot set back from the trees) and analysis (e.g., snow drift studies) will need to occur prior to construction of the parking area.

COMMENTS

As much as I detest the huge, ugly Cafeteria complex dominating Rim Village, I would caution against the total removal of all additions and a return to the original 1920's Cafeteria building size. During the peak visitation hours of 10:00 - 3:00, 1,000 people an hour visit Rim Village. During inclement weather these throngs of people need a temporary place to get out of the bad weather. The Cafeteria building needs to be spacious enough to handle several hundred people at a time. The idea of getting rid of gifts and other items that have no business being sold at the Rim, such as alcohol, is to be applauded.

2

I understand that the Visitor Contact Center will not be a true "visitor center". If the goal is to disperse visitors by getting them out of the store, then there needs to be a small auditorium to show the Park movies and a whole array of interpretive displays and panels. Not only will these displays educate people as to the existence of Crater Lake, but they will allow people a safe place to linger during times the Lake is fogged in and visibility has disappeared. The visitor contact station needs to be more than just a place to sit, with comfort stations, book sales, and a ranger desk. The building needs to be a full fledged Visitor Center capable of easily handling several hundred people for more an hour.

The full or almost full story of Crater Lake needs to be told in this building because there is no other place in the Park where this can be done.

3

The Rim Visitor Center is being envisioned as a two story building that will give an all winter view of the Lake. Since the viewing windows will be facing north, be aware that north is the lee side of the building. Winter snows blow in from the south and will pile up on the north side high enough to block the views. (Observe the lee side of the Lodge during the winter.) Please include a plan for removing the snow piles. Also, what about gaining winter access to the building? With the removal of traffic, and I assume snow plows, how will winter access be gained into the building and the surrounding walkways?

Position the film showing room on the second floor so that after the film has been shown the curtains dramatically open showing a beautiful view of the Lake and the surround rim of the caldera. The visitor centers at the Fort McHenry in Baltimore and at Capital Reef NP both do this with spectacular results! If the room had a sloping floor and auditorium seats, the visual effect would even be more spectacular.

With 3,000 - 6,000 visitors visiting the Park each day, the film auditorium will have to hold a minimum of 100 - 150. That size would allow for a 200 - 300 an hour capacity. Don't make the film auditorium too small.

Glad to see that restoration is being planned for the Community Building. Amazing that less than 10 years ago the Park's plan said that the building had "no historical significance" and was to be razed. Under the current plan the building has become significant. Good. There is a desire to conduct classes at the Park and a "classroom" type of building on the Rim needs to be available for group instruction in addition to

RESPONSES

2. The visitor contact station would be designed to accommodate a substantial number of people, but a large auditorium is not envisioned. The intent is to provide adequate information, orientation, and interpretation but not to hold the visitors for lengthy periods of time. The idea is to encourage the visitors to get out and see the outstanding resources of the park.
3. Snow removal and drifting snow levels are good points in regard to the new year-round visitor contact station. These are tough questions that will be addressed during the design phase.

COMMENTS

RESPONSES

evening programs. The restoration of the Rim Community Building will satisfy this need. Hopefully a small gathering room, downstairs, will also be designed into the new Rim Visitor Center for winter group orientation since the Community Building is not winter accessible.

4

During the future restoration of the Sinnott Memorial, the building will need to be restored to its original 1929 log look. Get rid of the 1960's look. The back display room of Sinnott needs to be upgraded with new displays. Geology talks used to be given back there using large display photos on days the Lake could not be seen because of fog or snow. Historically the Sinnott displays have emphasized and explained the geology of Crater Lake. Also, an interpretive display needs to be included about the building and the history of Sinnott Memorial. The rangers on duty down there get lots of questions on "How was this building built anyway?"

Removing buses from the Rim parking lot is a good idea. But I wonder if tearing down the Concession Dorm to create a bus parking lot is a good use for that space and the existing building. The Dorm is already there. Why tear it down if a better use could be found for it? It is going to take a great deal of study, but I suggest that it be turned into a Crater Learning Center similar to Yosemite's Resident Institute. I envision a short term residential center where people, young and old, could come to the Park, stay a few days in the old dorm, take classes either for credit or non-credit, and leave "singing the praises of Crater Lake." See page 14 of the Master Proposal.

5

The "resort" prices charged at the Lodge limit people of average means from having a quality overnight experience in the Park. An economic, educational residential facility using the old Employee Dorm would certainly fit the bill. A non-profit organization such as the Friends of Crater Lake, Southern Oregon University, or the Natural History Association would be the best to run such a facility. That way the Park Service would not be directly involved. The Government has spent \$21 million on the new Lodge and \$6.5 million on the new concession employee dorm. Why not spend a couple of million to provide a facility to educate young and old alike? Wouldn't it be wonderful to bring in school kids from all over the Northwest for a world class educational experience? Many of the National Parks are already doing this. Check out what Redwood National Park is doing at their residential outdoor school. It is a wonderful experience for school groups and is mostly self supporting.

Seasonal NPS offices could also be located in the old dorm. Give this a lot of study before demolishing the building. Placing bus parking on the old dorm site is commendable, but the use of the building as an educational center should take priority.

Trails

6

Nothing has been said about using the trail system to encourage people to get out of their cars. The 1905 wagon/auto road from behind the Lodge to Park Headquarters needs to be restored for summer foot traffic and winter skiing. Presently the old road is

4. The 1929 log appearance of the Sinnott Memorial was attractive, but was replaced in the 1960s due to structural problems. Reconstructing a log roof system to meet current structural codes would require significant changes from the original design. These changes in log sizes and locations would not meet the *Secretary of Interior's Standards for Rehabilitation*. Therefore, we will not be able to reconstruct the original log appearance.
5. The intent of the proposed action is to return the concession dormitory site at Rim Village to its natural condition. The dorm presently intrudes on the scenic view of the valley from the lodge. In addition, the dorm has structural problems, and if was renovated for education purposes, the use would be during the shoulder and winter seasons, when this area of Rim Village is closed due to inclement weather.
6. The restoring of the 1905 wagon/auto road from behind the lodge to park headquarters for summer foot traffic and winter skiing would be enjoyable for recreational purposes but would attract visitors to a significant historic route that could result in damage to the resource.

COMMENTS

RESPONSES

6 over grown, with a number of giant Mountain Hemlocks blocking safe use of the trail. The old road is historic and would provide foot access to either the Rim or to Park Headquarters.

7 A walking trail needs to be established in the Headquarters Historic District.

Cleetwood

8 The restoration of the Cleetwood Trail should take precedence over any other Park restoration. The trail is literally falling off the side of the Rim in five places. The massive erosion needs to be stopped. Already the damage is visible from Rim Village, six miles away.

8 I was on the trail crew that put in the Cleetwood dock bulkhead at the end of the trail in 1962. In order to find rocks to fill the turn around we dug back into the soft cliff and blasted. Few rocks resulted from all that effort. What we did find was mostly floating pumice that ended up floating away that first winter. For the past 35 years rocks have continued to fall from the unstable cliff. Before permanent resting areas can be built, something has to be done about the constant rock fall. The whole dock area is unstable. Remember that several years ago a German lady was killed by a falling rock while hiking Cleetwood. I am surprised that so few people have been killed or injured from all the rocks that fall daily along the trail.

9 Do a good study of the Lake fluctuations. In 1983 the Lake surface was so high, there was not even room at the bottom of the trail for the ticket shack. Business was conducted the whole summer from a wooden box. The Lake has fluctuated as much as 17 feet over a decade. This will influence where "permanent" setting areas are built.

Reducing the number of daily boat trips on the Lake is a good idea. The schedule should call for a return to the 9:00 a.m. trip. Mornings are the best time to view the Lake because of the lack of wind. Late afternoon is the worst and most uncomfortable time to be on the Lake because of increasing winds.

I was also on the crew in 1961 that explored the possibility of building a permanent comfort station at the Cleetwood trail head. A well was drilled that extended below the level of the Lake, but water was never found. Keep the Cleetwood area primitive. It is a nice feeling to be in an area of the Park where "civilization" has not reached. Make it attractive, but keep it simple and primitive.

Removing excess parking from along the Rim at Cleetwood Cove is desirable, but what is going to happen when the parking lot does reach capacity? People will just drive on up to the other turnouts and walk back. This may cause a pedestrian hazard that will need to be addressed.

Permanent comfort stations near the Cleetwood parking lot that can be pumped would be nice. Do not allow septic drain fields like those first proposed in the 1960's. We do

7. A historic district walking trail is being established in the park headquarters area.

8. Stabilization of the Cleetwood Trail is ongoing, and the proposed action would provide additional shoring up of some sections of the trail. However, the main problem is the unstable nature of the caldera wall. Trails to the lake have been constructed in other locations, but this is the most stable of the sites.

9. The lake has fluctuated considerably over the years, and that will be taken in to consideration in the location and type of lakeside structures at Cleetwood.

COMMENTS

RESPONSES

not want a repeat of what happened at Rim Village. Oh the smell!

Mazama

I have given over 50 programs in the Mazama Amphitheater, so I have an idea of what I am proposing. Do not move the Amphitheater. Keep it where it is. Sure, it is out of the way somewhat, but with proper signing people can find it. The trees have already been cut down there so why destroy another area of ancient trees? By moving the amphitheater closer to the centers of action (the store and cabins), noise and congestion will become a major problem. Also, light pollution will affect the quality of the projection screen. Keep the amphitheater where it is. It badly needs some restoration, after all it is over 30 years old, but moving would be a bad idea! And what a beautiful site it is, back by Annie Creek Canyon!

So many trees have been cut down in the Mazama area for the cabins and store, the visual barrier that used to exist between Mazama Campground and South Highway 62 has been eroded. The cabins can now be seen from the highway, especially at night. The plan needs to call for the planting of a major visual barrier. Hundreds of trees have been cut down, but none have been replanted.

Why should the Mazama cabins be expanded? The area has already reached capacity. No more trees should be cut down and no more pumice paved. People can find excellent accommodations outside the Park less than an hour away. Do not compete with the private sector. The Park planners keep talking about removing services to outside the Park boundary, but at the same time they keep suggesting expanding services inside the Park. If the plan is to reduce the services at Rim Village, then the same philosophy should be applied to Mazama Village.

The purpose of a National Park is not to provide facilities and a exorbitant revenue stream for a private concessionaire.

My only suggestion for expansion at Mazama would be the addition of a small group camping area.

The Mazama Village store is not of Park Service quality or design. It looks and acts like a cheap 7-11 or Minute Market. It has a dumpy, trashy, junky feel. Does the Park really want to expand and extend this non traditional look? The look just does not fit in. What happened when this thing was designed? Poor traffic flow also! Something needs to be put into the master plan that helps these ugly buildings. They just do not fit the quality of design that has made Crater Lake architecture world famous. Removing the public laundry will certainly shorten people's stay. It will also reduce the suds being dumped into the Mazama sewer lagoons.

Please, no trailer or RV hookups at Mazama. That needs to be left to private industry outside the Park. Keep the Park facilities simple and sparse.

10. The proposed action has been modified to retain the Mazama Village amphitheater at its current location. The proposed action does not include the construction of additional cabins, and the upgrading of picnic areas outside of the developed areas is beyond the scope of this plan.

10

COMMENTS

RESPONSES

Picnic Areas

10 There is nothing in the plan about upgrading the many picnic areas found in the Park. Nothing major in the way of maintenance has been done to these areas during the past 30 years. The pavement is wearing out. Better designs would help protect the vegetation and the adjacent ancient trees.

Post Office

11 Moving the post office to Rim Village during the summer months is not a good idea. The present location is easily found by visitors who need postal services. Moving the office to the Rim would create a hardship for Park employees and their families.

Steel Center

A NPS contact center of some type needs to be maintained at HQ. The area is so visually inviting people are going to want to stop for information or for first aid or for back country permits or on business and need someone to talk to. If Steel is closed to the public during the summer, then visitors will need to be directed to Dispatch. People need to be able to find a ranger in their time of need at HQ, even if it is only for a comfort stop. Unless a non inviting chain is put across the entrance road, people are going to want to stop and talk to someone.

Thanks for allowing the opportunity to respond to the new Crater Lake Master Development Plan.

I hope these suggestions from a long time associate will be found helpful and useful.

Sincerely,

Larry B. Smith
541-898-7402

11. During the summer, the Steel Information Center would serve as the base for interpreting the Munson Valley Historic District and other historical and cultural resources scattered throughout the park. In the park's off-season, October through May, the Steel Information Center would serve as an interpretive, educational, and resource center for groups and individuals with special interpretive or resource interests.

The Crater Lake Natural History Association would maintain a year-round sales area. The post office at the Steel Information Center would continue to serve visitors, park residents, park administration and the concession during the winter. During the summer a full-service post office would operate at the Rim Village visitor contact station, and there would be on-site delivery of mail to park administration, concession, and resident employees.

As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

