

September 8, 2007

Paul R. Anderson, Superintendent
Denali National Park and Preserve
PO Box 9
Denali Park, Alaska 99755

Dear Paul,

I am sending this letter on behalf of the board and members of Denali Citizens Council in response to learning that the National Park Service has plans to make permanent the Alaska Natural History Association bookstore at Toklat Rest Stop. Siting commercial facilities at Toklat Rest Stop is a substantive change to the intent of the Eielson/Toklat EA of 2004. In addition, it is a major change to planning intent expressed by the Entrance Area and Road Corridor DCP/EIS of 1997.

Relevant documents are quoted below:

1. Siting commercial facilities at Toklat Rest Stop is a major departure from planning intent expressed in the Final Entrance Area and Road Corridor DCP/EIS, 1997. In Appendix D of the Draft Plan (included by reference in the Final), p. 274-5, the service defines two levels of “Development Subzones” for the frontcountry;
 - a. **Level 1 (D-1)** “may include commercial facilities, interpretive facilities, and other administrative and support facilities....” D-1 areas in the final plan included headquarters housing and offices, land at the entrance where the visitor center and east end ANHA bookstore are located, and Eielson Visitor Center, among several others. (Final Entrance Area and Road Corridor EIS, first volume, p. 274, emphasis added).
 - b. **Level 2 (D-2)** “includes visitor services and administrative support facilities such as campgrounds, rest areas, and trail heads. This subzone does not allow for commercial facilities and buildings are limited to smaller structures. While the sights and sounds of people and vehicles are common, these areas are immediately adjacent to backcountry or designated wilderness.” D-2 areas in the final plan included all existing campgrounds and rest stops, Toklat among them. (Final Entrance Area and Road Corridor EIS, first volume, p. 275, emphasis added).
2. Siting commercial facilities at Toklat Rest Stop is a reversal of the FONSI that completed the EA for Construction of a new Eielson Visitor Center and Permanent Rest Stop at Toklat (2004). The FONSI, quoted below, states:

“The State of Alaska and other commentors requested that permanent facilities at Toklat, aside from toilets, would be roofed but otherwise open to the elements. NPS agrees that, unlike the temporary facilities necessary to replace the Eielson functions during visitor center construction, the permanent facilities at the Toklat Rest Stop will not include a bus dispatch office, interpretation

DCC Board

Jean Balay
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Cass Ray

Jenna Hamm
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Nan Eagleson

Julia Potter, Community Organizer

office or structure for book sales. The permanent Toklat Rest Stop will be designed along the lines of the protected space at the Teklanika and Polychrome Rest Stops and will include one or more sheltered areas-such as a pavilion-for protection from the rain for visitors and as a protected area for interpretive talks and exhibits.” (FONSI, p. 4, emphasis added)

This action, constituting a significant change in pre-existing planning direction, requires review under NEPA, which would include new analysis and new opportunities for public comment. We request that any plans to put a permanent bookstore at Toklat be canceled until such review can take place. We welcome the opportunity for a full public discussion of the appropriateness of commercial activities within the Wilderness core park.

Briefly, here is our view. The Toklat River is an important wildlife corridor with a central role in the history of the park. The scenery and setting are large, dramatic and emblematic. These facts strongly argue for keeping folks out of doors and in the environment at Toklat, not inside a bookstore. Additionally, we agree that it is appropriate to remove commercial sales from Eielson Visitor Center, even though it is zoned D-1, and we support your decision to display art at the Eielson Visitor Center as an alternative. There is no mandate for commercial activity within the Wilderness core park after one has left the entrance area, especially now that there is a well appointed bookstore at the entrance.

Sincerely,

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

Nancy Bale, President, DCC
907-277-3825