

January 24, 2008

Marcia Blaszak, Director Alaska Region
National Park Service
240 W. 5th Avenue
Anchorage, Alaska

Dear Director Blaszak,

On behalf of the board and membership of Denali Citizens Council, I am submitting this request that the National Park reconsider its decision to maintain temporary commercial facilities (a bookstore) at Toklat Rest Stop after Eielson Visitor Center is completed. The attached letter from DCC to Superintendent Paul Anderson dated September 8, 2007 argues that siting commercial activities at Toklat Rest Stop violates NPS planning intent for that development node along the park road.

As presented in the letter, this planning intent for Toklat has been finalized, both in the Entrance Area and Road Corridor Development Concept Plan/EIS (1997), and in the EA for Construction of Eielson VC and Toklat Rest Stop (2004). According to the EA, the commercial activity (bookstore) at Toklat would be temporary, and would disappear upon completion of the Eielson Visitor Center, scheduled for this summer. We see no reason to change planning intent expressly laid down in an important and relatively recent planning document, the Entrance Area and Road Corridor DCP/EIS (1997). This DCP/EIS zoned Toklat Rest Stop D-2 (no commercial facilities).

In response to our letter of concern, Superintendent Paul Anderson sent a letter on September 21, 2007 (attached). In that letter, he stated that a Categorical Exclusion for the temporary bookstore had been completed over the summer of 2007. DCC was not notified of this action by NPS at the time, but we received information from DCC members expressing concern regarding this action. Superintendent Anderson indicated in his September 21st letter that NEPA compliance regarding possible permanent commercial activities at Toklat would be necessary, but the timing for such compliance was vague and open ended.

DCC Board

Nancy Bale
Jean Balay
Cass Ray

Jenna Hamm
Joan Frankevich
Nan Eagleson

Julia Potter, Community Organizer

This fall, I requested, received and reviewed a copy of the Categorical Exclusion. Upon review of this document, we argue that even a “temporary” commercial facility at Toklat Rest Stop beyond completion of Eielson Visitor Center is not eligible for a Categorical Exclusion. We argue that the Categorical Exclusion incompletely considered the NEPA mandated function of Toklat Rest Stop

We respectfully ask that you consider the following points:

1. The Categorical Exclusion states, under *B, Project Description/Location*, that although the FONSI for the Eielson/Toklat EA in 2004 did not allow for a permanent structure for book sales, “Upon further review the Superintendent has determined it is in the public interest to maintain an art gallery at Eielson, and a temporary Contact Station, including a bookstore, at Toklat until the NPS plans for permanent facilities at Toklat are completed.” This sentence suggests that “permanent plans” for Toklat Rest Stop have not yet been completed. They in fact have been completed; both in general outline (Entrance Area and Road Corridor EIS, 1997) and in detail (Eielson/Toklat EA, 2004).
2. The Categorical Exclusion does not mention by name or quote the guiding NEPA planning document, the Entrance Area and Road Corridor DCP/EIS, 1997, or its zoning stipulations. These zoning stipulations are detailed and clear (Appendix D, pp 274-5), and prohibit commercial activities at Toklat. No distinction is made in the DCP/EIS between “temporary” and “permanent” commercial facilities. As such these stipulations may constitute new information not considered in preparation of the Categorical Exclusion.
3. Under *Mandatory Criteria* the Categorical Exclusion answers **NO** to the question “would the proposal establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?” We disagree. Maintaining a temporary commercial node at Toklat beyond completion of Eielson and for an indefinite term, would tend to set a precedent for activities for which this area has not been zoned.
4. Under *Mandatory Criteria* the Categorical Exclusion answers **NO** to the question “would the proposal have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects.” We disagree. The character of the park road is an important element in past planning documents, defined in detail on page 269 of the Entrance Area and Road Corridor DCP/EIS (1997), Vol. 1, Appendix C “ As visitors travel west into the park, they experience a transition in environment from urban to rustic to primitive...West of the Teklanika River, the landscape and the road change...At this point the

landscape and the character of the road become integral parts of the park experience.

Engineered structures such as bridges are used only as necessary to protect the resource or preserve the road. Signs and related items are kept to a minimum. The character of the road is in keeping with the character of the land; a primitive, low-speed road located in a wild and pristine land.” It is this definition that guided the National Park Service in preparing the DCP/EIS of 1997, and led to the zoning stipulations for Toklat. We argue that incremental changes that add the trappings of civilization to what is supposed to be a rustic experience will ultimately degrade the experience NPS has intended to provide.

5. There is a large bookstore at the Entrance Area. NPS could make available reference copies of necessary field guides for use on the buses. Passengers can then be directed to visit the Entrance Area bookstore either before or after their road trip. NPS is under no obligation to make the retail experience of its visitors more convenient than this.

We ask that the National Park Service remove the temporary commercial facilities from Toklat Rest Stop as soon as Eielson Visitor Center is complete, in compliance with existing planning intent.

Sincerely,

Nancy Bale, President DCC

907-277-3825