

May 31, 2004
Tom Irwin, Commissioner
DNR, 550 W. 7th Ave., Suite 1400
Anchorage, Alaska, 99501
Re: LAS 24466

Dear Mr. Irwin,

On behalf of the Board of Directors and members of Denali Citizens Council (DCC), I would like to appeal the permit referenced above (Alaska Travel Adventures Jeep Tours along the Stampede Trail).

DCC is a grassroots organization headquartered in the Denali Borough and comprised of 250 local, statewide and national members. Several of our members live in Healy, some of them along the Stampede Road. We submitted comments on the permit application (attached).

Your northern region staff was extremely helpful and cordial during the permitting process, and we appreciate their efforts. We also appreciate their plan to conduct three inspections of this operation over the course of the summer. However, we and many of our members are genuinely concerned regarding cumulative impacts of these jeep tours, both to local residents and to the state's interests.

From the ATA Website, here is a description of the jeep tours: "The first few miles of the Stampede Road are paved, but beyond this point your guide will lead you along some very primitive roadway providing you with plenty of bumps and dips and sways. There will be ample opportunity to switch drivers so everyone can enjoy the thrill of maneuvering along this wilderness road."

Our concerns appear below in the following bullet points:

- **The state takes an unacceptable risk of environmental damage by allowing jeeping on an undeveloped trail overlaying continuous permafrost.**

Although jeeping is considered a legitimate activity in Alaska's backcountry, its use is highly questionable in the specific permit area. The ground between 8 and 11 Mile on the Stampede Road is composed of "Alpine Basin" soils, in which "Permafrost is continuous, found over 80% of the area, which is the major construction limitation." (from a presentation authored by USDA Natural Resources Conservation Service soils scientist Mark Clark, given April 3, 2004 at the Stampede Summit in Healy). Jeeps on well founded backroads in areas of low permafrost may be acceptable. Use of jeeps in an area rendered vulnerable by permafrost is unwarranted.

DCC Board and Staff

Nancy Bale, President
Jean Balay
Land Cole, Vice President
Allen Cornelison, Treasurer

Nan Eagleson
Joan Frankevich, Secretary
Grady Wilson
Leslie Adams

Linda Paganelli, Issues Coordinator
Sue Deyoe, Winter Community Organizer

- **The threshold level of disturbance in the permit is too great.**

The permit establishes the threshold criteria as “an increase of 12 inches in trail cross-section depth or a doubling of trail width.” We argue that a *50% increase* in trail width constitutes a threshold level of disturbance at this site.

Considering the number of jeeps that are permitted to travel through this area per day, we feel that widening of the trail between mile 8 and 11 is inevitable. If the jeeps encounter other off road traffic at this location, they will be forced to widen the trail in passing one another. Despite suggestions from locals that these jeeps can and will do damage, the final permit makes no reductions in permitted numbers.

- **The state takes an unnecessary risk by allowing an open fire pit in an area of frequent high winds.**

If a fire is to be allowed then we suggest a wood stove. However, a fire is not necessary to provide either comfort or ambience. I have taken a guided kayak-hike trip in Seward in wet, rainy conditions, and no fires were used. An enclosed stove may be acceptable, but the risks of open fire far outweigh any benefits.

- **The permit provides incomplete descriptions of the impacts of jeep tours maintenance operations.**

For example, the method for disposal of human waste has not been sufficiently described in the permit letter. Will the jeep tour lead jeep provide this transport? The permit allows 2-3 tours of 6 jeeps per day. How much transport will be required for support activities such as trash and waste disposal, transportation for support staff, etc.? The permit does not discuss the location of trash and waste dumping. Will this be within the Denali Borough?

- **User conflicts and increased dangers during hunting season in September have not been addressed in the permit.**

We appreciate the opportunity to air our concerns during this appeal process. Only a drastic reduction in the number of trips or a change of location will sufficiently reduce the damaging impacts of this activity. If you would like to contact me on any specifics, please call 907-277-3825

Sincerely,



Nancy Bale, President Denali Citizens Council
907-277-3825
nancy@denalicitizens.org