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July 6, 2003

To: Paul Anderson, Superintendent, Denali National Park  
From: Denali Citizen's Council  
Subject: Gravel Acquisition Plan EA

On behalf of the Board and members of Denali Citizens Council, thank you for the opportunity to comment and for extending the comment deadline to July 7, 2003. After reviewing the gravel acquisition plan for Denali Park, we feel that a number of alternatives have some good aspects but each is limited in its overall benefit to the Park, its resources and visitor experience.

In the plan it's stated that the Park will need approximately 375,000 cubic yards of material for a ten-year period. We question the need for this large amount and we hope that the Park Service can back up these numbers and demonstrate the capability of moving this much material. Rather than simply question these numbers, however, we urge the Park Service to develop a plan in which long term sustainability is the goal with a leveling off or reduction in the need for materials.

Alternatives could be addressed such as use of matting and engineering cloth in soft areas to reduce the amount of materials for repairs, dust palliatives and construction techniques which help conserve materials and active plans to recover materials which have migrated off the road. While some areas of the road need materials, some areas are over-wide. The Park Service should also look at using gravel sources from out of the Park at a higher level. There should be a cost versus benefits analysis on using more contracts for gravel sources outside of the Park. Though not practicable for the whole road length it still would lessen the overall impacts to Park resources.

The Park Service should also develop guidelines for an overall weight and type of bus to be used on the Park road. There have been limits on the number of busses but there does seem to be a movement towards larger, heavier busses and other design features that have more impact on the road surface.

The number of busses going to Kantishna is a growing concern and these should be limited, not as a tool to limit growth in the Kantishna area but to protect the quality of the experience that visitors seek in Denali.

We strongly support the reclaiming of North Face corner. We favor the use of mining tailings in the disturbed areas in downtown Kantishna. This should be the main focus for acquisition of gravel in the western areas of the Park road. Although the Kantishna area has been cited as a wilderness destination, downtown Kantishna has been disturbed from previous mining. Gravel extraction there could be combined with the rehabilitation of existing gravel tailings.

The issue we most strongly oppose in any alternative for gravel extraction is developing Moose Creek Terrace. This is in direct conflict with the Park Service's expense of millions of dollars to buy out and reclaim existing mining claims along Moose Creek. Another concern on developing Moose Creek Terrace is that NPS would be building a mile of new road into the area that has been considered part of the "northern access" road. Although the Park Service has not embraced building a northern access road, now it would be the Park Service itself that would be building the first mile from the west. In addition, the

planned route to the planned gravel mining site and road would have a direct impact on visitors who use Moose Creek as a hiking pathway.

The Kantishna Hills and Moose Creek are one of the three or four most important subsistence zones in Denali Park. The Kantishna area has already been partially closed to subsistence hunting due to the development in that area. Adding a mile of road and a gravel site would add more impact on the subsistence value of this area, a value that the Park Service is mandated to protect. The fact that this plan would be released and the comment period closed before the Denali Subsistence Commission could meet and review the alternatives shows a lack of concern for protecting the subsistence values of this area.

Moose Creek may have wilderness suitability and that should be considered before any development. This area is also in the historic fall migration route and often the rutting area for the Denali caribou herd. Although the herd hasn't recovered from the drop from 20,000 to 30,000 animals (Murie 1944) to its present 1800 to 2000, the Park Service should be protecting areas of traditional use and helping with recovery. Development in this area is in direct conflict with that goal.

Though the draft plan did review the impacts of gravel mining and the one mile of road building for a site at Moose Creek Terrace, it did not adequately address the added impacts of a possible rock crusher, fuel storage, fuel delivery and equipment maintenance facilities which would come at some point if not at once. The EA states (pg. 2-33) "that given the size of this deposit, this source would likely last for several decades". The level of impact for this length of time should require an EIS.

Spreading out pit sites along the road makes for shorter hauls by truck, reducing the mile for mile impact on the road from dump trucks. Trucks hauling gravel on the Park road impact the Park visitor, wildlife and the road itself. This wasn't adequately addressed in any alternative.

Lacking from the plan is consideration of developing a pit at about mile 80-81. This area has suitable topography, can be out of sight of road users and has been cited before as an area with suitable materials. It should be included in a 10 year assessment since materials would be more central to the use area, requiring less hauling and travel time, more efficient road maintenance and less impact on Park resources.

In the EA, NPS supports the unique character of the Park road and its compatibility with the surrounding terrain, giving visitors a chance to experience the Park's landscape while sightseeing and wildlife viewing. It is an experience unique to any National Park.

We urge you to include our concerns in your review of the present acquisition plan, and to develop a final plan that provides for the maintenance needs of this unique road, considers both sustainability and safety, and triggers the least amount of impact on Park resources.

Sincerely,

Bruce Lee

Board Member, Denali Citizens Council