

Denali Citizens Council
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National Parks Conservation Association
Alaska Regional Office, 750 West 2nd Ave., Suite 205, Anchorage, AK 99501, 907-277-6722

February 17, 2006

State of Alaska Department of Natural Resources
Division of Mining, Land and Water
3700 Airport Way
Fairbanks AK 99709-4699
Attn: Chris Milles Acting Northern Regional Manager
nroland@dnr.state.ak.us

Re: Stampede Road Improvement Project (or Stampede Road Extension) –
Materials Sites: ADL 417624, 417625, 417626 & 417627
Easement: ADL 417638

Dear Mr. Milles,

We are submitting these comments on behalf of the Board of Directors and members of Denali Citizens Council (DCC) and the Alaska Regional Office of the National Parks Conservation Association (NPCA).

DCC, a community based public interest group with ~350 members, has worked since 1974 to raise awareness about issues affecting our livelihoods, lifestyles and the well being of Denali National Park and Preserve. Many of our members live or have lived in the gateway communities of Denali National Park. We are keenly aware of the importance of this park to the local community economically, socially and environmentally. Furthermore, we support careful development on lands adjacent to Denali National Park, realizing that these lands, although available for a greater number of uses, are universally known and valued as critical wildlife habitat and for wilderness recreation.

NPCA's mission is to protect and enhance America's National Park System for present and future generations. We believe that our National Parks and historical sites embody the American spirit and we strive to protect them in the face of increasing demands placed on them.

Currently, the State of Alaska Department of Transportation and Public Facilities (DOT) proposes to construct a 12 foot wide pioneer road from 8 Mile Lake to the Savage River near Denali National Park. We have thoroughly reviewed the two permits being considered by the State of Alaska Department of Natural Resources (DNR) for the Stampede Road Extension Project. The permits are: the 1000' road construction easement (ADL 417638) and the four proposed material sites (ADL 417624, 417625, 417626, and 417627). We urge DNR to deny these permits and give our reasons below in a series of points.

- 1. Simply said, this project is premature. It pre-empts existing planning efforts using a design and location that are not well considered. Although it claims not to be North Access into Denali National Park and Preserve, it must be considered as such, since it is proposed for one of the suggested routes in the North Denali Access Reconnaissance Study.**

Improvements to the Stampede Road have been continuously revisited over the past decades. Currently DOT is conducting the North Denali Access Reconnaissance Study (NDARS). The Stampede route is but one of the routes under consideration by this study. No work should proceed until the findings of this study are released this year. DOT should be required to follow its own agency process.

- 2. The Stampede Trail route, though asserted as an RS 2477 right of way, is the wrong location for a road in this day and age.**

The original "Stampede Road" to Earl Pilgrim's antimony mine was conceived and executed in another era (1965), prior to the environmental and cultural resource protection laws and regulations that we now have in place. These laws and regulations now mandate careful planning that takes into account the potential impacts and appropriate mitigations to those impacts. Just because this road project was tried before does not mean that it was or is a good idea. The Stampede "Road" was only used once by vehicle and it proceeded to sink back into the tundra. The soils in this area are Alpine Basin Soils, the wettest and most laden with permafrost. An endless supply of gravel will be needed to keep this road from sinking back into the tundra like the 1965 alignment did upon completion.

- 3. The use of state-only funds may avoid some environmental oversight and expedite construction, but is untenable in the long run.**

The Stampede Road project is part of the Governor's 2004 Transportation Initiative for "Tourism Infrastructure." Justified as a way to fast-track needed infrastructure, this project relies on potentially limited funds, ignores more pressing state transportation needs, and fails to acknowledge the absolute requirement for federal oversight if this project ever must leverage federal dollars in the future. Why not submit the project to federal oversight now, and avoid building a road that ignores to important planning standards.

- 4. There is little justification for construction of a pioneer road in this setting.**

The Denali National Park North Access Feasibility Study of 1997 (on which DOT was a collaborator) provides direction on what specifications a road should be engineered to meet.

"Specific design would be almost entirely a function of the size and volume of expected traffic and the speed at which the traffic would travel. A pioneer road was not considered because they are generally used for temporary access only and such a road would not meet the intent or the need for the new north access route. ADOT/PF experience has shown that converting a pioneer road to a modern road generally results in higher overall construction costs and the finished product often has greater

long-term maintenance problems and higher annual maintenance costs than a properly designed and constructed road over the same terrain.

Alaska Department of Transportation and Public Facilities was in agreement that the minimum road width should be 28 feet. This would provide two 12 foot driving lanes with 2 foot shoulders on each side. Anything less would be a hazard for pedestrians and bicyclists and there would be insufficient room for a vehicle to pull over and stop without impeding traffic...Gravel road cost is higher per mile than pavement at about 4:1. Blading plus reapplication of gravel and calcium chloride for dust control add to the cost for approx. \$7,000 per mile in maintenance (1997 costs)" (North Access Feasibility Study, 1997, p. 1)

Instead of adhering to this policy DOT proposes a twelve foot wide pioneer road, one that will not handle traffic for which it is proposed and will be a maintenance headache. This is a waste of Alaska state funds, especially in today's political climate of scrutinizing government waste in transportation projects

5. The easement for this project is inexact and the map is misleading.

The loose language in the public easement notice for the Stampede Road Improvement Project stating that the road will “**generally** follow RST 340, the Lignite-Stampede Trail,” and that the “route of the easement for the proposed pioneer road will **generally** follow the trail as reflected by DOT’s GPS readings taken in the field in 2005,” make it obvious that little preliminary work has been done to make this a viable project. How can DNR authorize DOT to construct within a 1000’ corridor centered on the existing trail when that centerline has not been located, surveyed or recorded?

The map issued by DNR identifying the proposed route and material sites for the project is flawed. The route on the topographic map indicates the project route, as identified by GPS tracking (the Garmin program for this area has been known to have flaws) in the fall of 2005 on what was perceived to be the Stampede Trail. During a single field check, someone unfamiliar with the actual trail could easily mistake other trails for the correct one.

The material sites are associated with this projected route, the red line on the map, but the true RST 340 is questionable. The only items on the map that are correct, according to DNR, are the material sites and project route, which differ greatly from the indicated Stampede Trail alignment. They are correct in relationship to each other using latitude and longitude, but not correct in relationship to any other topographic feature. This renders the map useless to the public trying to determine the exact location of the proposed route, and a map is the only accurate way to convey to the public where this project will be located.

The DOT map is confusing where the GPS trail, the red line, leaves the second and largest gravel pit ASL 417627. The map makes it appear that the existing Stampede trail crosses Fish Creek and then stays on the west side of the creek for several miles. This is very deceptive because the actual Stampede trail as constructed in 1965 (the basis for RST 340) stays on the east side of Fish Creek for a half mile and then repeatedly crosses the creek and even runs for significant stretches

right in the creek bed. (As shown on the map by the black double dotted line.) The request at this site for 160 acres shows that DOT's need for gravel to build and maintain this road will be excessive.

This map confusion is compounded where the red line trail is shown leaving the 3rd material site ASL 417626. It appears on the DOT map that the existing trail (RST 340) leaves the material site and immediately crosses Fish Creek and then goes slightly south onto higher ground. This gives an entirely false impression. The existing trail actually follows right along Fish Creek in an area of beaver ponds and is subject to substantial winter flooding by overflow which results in ice build-up many feet in depth.

How can the public comment on the gravel pits and easement when the map we are using to evaluate this is incorrect? It is impossible to comment when the tools we have been given are inaccurate. We request that DNR provide an accurate map of the project that indicates the proposed route in relationship to the actual Stampede Trail (RST 340) and all other topographic features. The permit states that RST 340 is not located, which means the road has not been surveyed and recorded. How can DNR make a guarantee that the new road will be in the corridor when DNR does not know where the trail officially is? How will DNR reconcile that discrepancy?

The inaccuracies with regard to water bodies on the map are substantial and should be corrected. The DOT engineers involved in this project should have aerial photos on which they can reconcile their GPS route and its relationship to topographical features more accurately than this map does. These photos should be made available to the public during an extended comment period.

6. Material sites are poorly marked, too large and not placed with the intended use of the road in mind.

All four material sites should be marked in the field, so that an accurate determination of impact can be made. This is especially necessary for the first material site proposed near 8 Mile Lake, where visual impact would dramatically compromise the scenic viewpoint on Borough-selected Municipal Land Entitlements. This proposed pit site ADL 417624 is adjacent and directly west of the current parking area and thus would be in the immediate foreground when viewing Mt. McKinley. There is an informal camping spot here, the current gravel road ends and the trail begins. It is also the end of State summer road maintenance. The main access trail to 8 Mile Lake starts there and goes 1/2 mile down to the lake access for recreation and private cabins. It is the first and best location to view Mt. McKinley along Stampede road until about 17 miles further out the trail. If the state promotes this project on the basis of tourism, greater consideration must be given to viewshed impacts.

These four large materials sites could impact a broad area in which there are multiple potential impacts. The materials request states that clearing and thawing will be done far in advance. This recognizes that there is permafrost to be thawed to liberate the gravel. Three sites are forty acres and one is 160 acres. They will be developed in 5 acre cells. The permit request states that

“DOT/PF will resort to selective development when there are no suitable materials in the initial cells.” DOT/PF is asking for a great deal of room to work in here, a sign that there is little field knowledge of the exact composition of these sites. Site specific examination of these areas prior to their permitting would result in more accurate site selection and less overall impact from these material sites.

7. It is premature to grant this permit when impacts to wetlands have not yet been analyzed nor mitigations specified.

The amount of wetlands impacted by this project requires a thorough environmental review. The Corps of Engineers should do a field evaluation in the summer for a project of this wetland magnitude. Final granting of an easement should follow these studies, not precede them. Has wetland mitigation been incorporated into cost estimates and feasibility analyses for this project? What guarantees will the State provide to ensure that appropriate and necessary mitigation will be taken and enforced before and after development?

8. This route should not be permitted until the present cultural resource inventory is updated.

At this time exact archaeological and historic sites in relation to the proposed and existing route have not been thoroughly documented. Within the 280 acre project area there are undoubtedly unidentified archaeological. The May 1980 report, “Reconnaissance of Cultural Resources along the Stampede Road,” by M. Dean Pittinger and Elizabeth A. Thomas, was done after the 1978 DOT authorization to build the road to 8 Mile Lake. It is the most current and not very detailed survey, covers only the existing road, and recognizes 7 archaeological sites. In original Alaska Road Commission reports these road alignments are often pre-existing native trails with historical and archaeological sites along them. Discovery of such sites should precede permitting.

9. Impacts to world renowned wildlife populations have not been considered adequately during this permit process.

This road would bisect the Wolf Townships, an area the state has recognized as important habitat by declaring areas west of the Savage River off limits for wolf hunting and trapping and closing the area to caribou hunting for many years. The Tanana Basin Area Plan Subunit 4E1 states the primary use of this land is public recreation and wildlife habitat and it is prime-rated for caribou, moose, grizzly bear and furbearers. A road through this area would increase the pressure on these world famous populations.

10. Consultation with the National Park Service has been inadequate.

Activities on state lands outside of the park should also be coordinated with the NPS in order to enhance the visitor experience and to avoid haphazard development. It is important to share the NPS perspective, one that is based on existing planning efforts, and to consider the associated effect of the 1980 expansion of Denali National Park and Preserve.

In the Denali National Park and Preserve 1986 Land Protection Plan and General Management Plan, the area of state lands east of the Sushana River in the Stampede area called the Wolf Townships were identified as the park's highest priority for acquisition. The GMP states, "These lands are essential to preserve habitat for moose, wolves, bear, sheep, and caribou which migrate annually into the area from present park lands."

The GMP further notes that: "A northern access route through the park would have severe environmental impacts." The Senate report accompanying HR 39 (the Alaska National Interest Lands Conservation Act) says that "the prime resource for which the north addition is established is the critical range necessary to support populations of moose, wolf, and caribou as part of an integral ecosystem."

The Stampede Road Extension if built as planned in two stages would end abruptly at the park boundary near the Sushana River. There is little chance that it could continue into the park. The northern additions (added by ANILCA in 1980) are highly suitable for wilderness designation and are currently managed to retain their wilderness character. The continuation of this road would be a controversial, time consuming and lengthy process at best, and would require amending the Denali Park General Management Plan.

11. This permit must carefully consider social and economic impacts to existing communities adjacent to the Stampede Road. In the assertion of benefits, local citizens' needs must receive consideration.

In the easement request the DNR says that they will evaluate social and economic impacts of the proposed easement. The stated goal of this project is to attract more visitor use to the area yet there is no mention of the impact of increased road usage on the residents of the 4 square mile Panguingue Creek residential subdivision. Where is the evaluation of current road usage and the predictions for increased use? There is a total lack of information on the social and safety issues and cost/benefit analysis for this project. Filling these gaps would ensure that the development would provide the greatest benefit to the broadest possible audience.

There is no mention of the currently existing dangers along the first four miles of Stampede Road which were currently chip sealed in 2000. 140 people and four tourist oriented businesses reside in the subdivision. The intersection of the Stampede Road and the Parks Highway is dangerously aligned at a 60 degree angle and has no turn lanes. The 2 mile long portion of the road which bisects the subdivision is narrow, has 21 driveways and side roads, numerous blind corners and hills. The entire 2 mile section is posted at 20 MPH. DOT/DNR proposes a project which is designed to attract more traffic to the road without having even acknowledged these existing problems in their request

This first section of the Stampede Road is clearly not adequate for the anticipated increase in traffic which this project will produce. These current problems should be addressed before DOT does anything which will attract more traffic. Without any traffic forecasting, how does the State propose to mitigate the impacts to the existing road's safety and structural integrity? What will this development do to the social and economic well-being of area residents?

The George Parks Highway and Alaska Railroad already provide visitors a remarkable experience. Why are we not talking about upgrading facilities along the main north south corridor through the state to accommodate increased tourism needs? The proposed road extension will actually hurt the tourism businesses built around the wild, quiet and remote feel of this area. How will the State ensure that the existing businesses will not be negatively impacted by this development? The 280 acres of proposed gravel pits on open tundra can devastate any views of Denali and the surrounding mountains visitors would hope to see.

12. This permit is requested without overall land use and infrastructure planning and before the Denali Borough has completed a Comprehensive Land Plan.

In addition, this proposal includes no money or plans for visitor facilities such as campgrounds and restrooms, leaving the residents of the area to deal with the problems this access would create. This project will open access for residents to more public recreation opportunities, perhaps we need to be looking at how we plan to develop and manage this area overall. The desire to lease state land along this corridor will increase. The future plans for maintenance are also painfully inadequate. Without a budget for road maintenance, how does the State propose to provide for the upkeep of this road and its continued use?

DOT Commissioner Barton claims this improved access to state land will reduce the environmental impacts currently being caused by off-road vehicle travel and provide visitors and residents with more opportunities for wildlife and scenic viewing areas. However, without accompanying infrastructure and trails planning, this improved access will be a problem, not a benefit, allowing greater ORV use without marked trails, hunting and poaching impacts, and public safety issues. This road would be bounded on the north, south and west by the park whose management standards are significantly different from those on state lands. Little cooperative planning for these conflicts has been done between the State and the National Park Service.

Conclusion

The State must weigh public input on this project carefully. Already \$5 million has been allocated and DNR is following a mandate from the Governor to proceed. Please reconsider whether this project is truly in the best interests of the State of Alaska, Alaska citizens or residents of the Denali area. The public notice clearly states, "If public comment in response to this notice indicates the need for significant change in the decision, additional public notice will be given on or about March 1, 2006." There is clearly inadequate identification of the easement and material sites. This makes it impossible for the public to make substantive comments. We urge DNR to deny the permits for easement and materials at this time since the public was not given adequate information for comment.

DCC and NPCA hope that you will be receptive to our concerns regarding the Stampede Road Improvements. Two resolutions have been passed by the Denali Borough Assembly concerning this project. The Mayor, Planning Commission, Panguingue Creek Homeowners Association, the Middle Nenana Advisory Committee and Denali National Park have each issued letters questioning the Stampede Road Improvement Project.

While we agree that tourism infrastructure is important for our state and this area, this project will set a misguided precedent. General fund dollars will cover the cost of the work with no opportunity to leverage federal dollars. This could be problematic in the future when the state coffers are smaller. We should be investing in the areas that are currently heavily used by tourism. The Stampede Trail is not one of them. If we are attempting to make the best use of state transportation funds, the current allocation and the proposed \$9 million additional should be put into other transportation projects.

Sincerely,

Cathy Lieser
Community Organizer, Denali Citizens Council

Jim Stratton
Executive Director, National Parks Conservation Association

cc. Governor Murkowski
Mayor Talerico
Senator Seekins
Representative Guttenberg
Superintendent Anderson