

June 25, 2012

RE: Proposed Public and Charitable Material Sale, ADL 419038, Master Pit Reference, ADL 419270

Chris Milles, Northern Regional Manager
Division of Mining, Land, and Water
Department of Natural Resources
3700 Airport Way, Fairbanks AK 99709-4699

Dear Mr. Milles,

I am writing on behalf of the Denali Citizens Council regarding the proposed material sale referenced above, resulting in an expansion of the Antler Creek gravel pit along the George Parks Highway from 12.7 acres to 67.7 acres.

The Denali Citizens Council (DCC) is a grassroots conservation organization founded in 1974, now with over 300 members mostly in the Denali Borough area. DCC works to protect the natural integrity of Denali National Park and Preserve by supporting the ecological and wilderness values for which the Park and Preserve was established. DCC also fosters responsible planning in the greater Denali park community.

We found out about this project only on the Thursday before the comment deadline, and have not had a chance to thoroughly evaluate it. However, we are very concerned about the visual impacts the project may have at the northern entrance to Nenana Canyon, which itself is the major northern visitor gateway to Denali National Park and Preserve and the George Parks Scenic Byway. We believe in maintaining the highest possible standard of protection for this area, since it is the most important tourist destination in the interior of Alaska. Our preference would be for a gravel facility of this size to be located elsewhere.

While the analysis of the project recognizes the designated scenic byway in this area, it does not appear that DNR consulted the DOT Scenic Byways program, the DNR State Parks staff who are working on an interpretive plan for the byway, or the volunteer committee that advises on scenic byway implementation, to get their input on the project. Scenic byway designation deserves to be taken seriously by the state as a planning tool if it is to have any positive future impact. I hope that DNR consults these professionals and volunteers prior to reaching a final finding.

Because of the importance of this area as a gateway to the national park and a state scenic byway, we believe both the development and reclamation plan deserve more serious consideration than they have been given. In places where scenic viewsheds are valued, landscape analyses are often done to determine ways in which sites can be developed to minimize the

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aesthetic impacts. We believe DNR should conduct such professional analyses when contemplating projects within the scenic byway corridors, including this one. It would also be worth developing a graphic depiction of what DNR's expectations for reclamation would look like, so DOT and the public understand the goal. Unfortunately, the state's record on reclaiming gravel pits is not great, judging by the scars that greet travelers at the entrance to so many towns and along so many stretches of otherwise scenic roads. We need to do better here.

Several of our members have also expressed concern about the site creating unnecessary truck traffic along this stretch of road, impacting both safety and scenery. The notice was not specific as to which projects would be receiving gravel. We would certainly like for gravel taken from this pit to only be utilized in projects that are very near to the site, to minimize the amount of truck traffic along this section of road.

The George Parks Highway serves many functions, and we understand the need to obtain material for highway maintenance and upgrades. However, one of the highway's major functions is to provide transportation for hundreds of thousands of both in-state and out-of-state tourists each year. Those tourists are traveling the highway to experience Alaska's breathtaking natural scenery. DNR and DOT need to see as part of their mission the enhancement and protection of this scenic experience, or you will gradually destroy it.

Finally, while we try to keep our eyes open for on-line public notices for state projects in the Denali Borough, we did not see this notice posted. Because we comment on most state lands projects in this area, we would appreciate getting the electronic notices sent to us directly when they become available so that we have time to communicate with our members and provide meaningful feedback to you. Please send notices regarding actions on state lands in the Denali Borough to mail@denalicitizens.org if at all possible, or let us know if for some reason you are unable to regularly do so. Thank you.

Sincerely,



Charlie Loeb
President, Denali Citizens Council