

# ALASKA STATE LEGISLATURE



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## Representative David Guttenberg

Mr. Chris Milles  
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Alaska Department of Natural Resources  
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Dear Mr. Milles,

Thank you for the opportunity to comment on the proposed extension of the Stampede Road. I urge you to deny the requested permit and tell the Alaska Department of Transportation and Public Facilities (DOT&PF) to complete their study on potential northern access routes to Denali National Park and Preserve before proposing any road improvement or new construction intended to enhance tourist infrastructure in the area.

My conclusion is based on several factors:

1. Local residents oppose the project.
2. Recreational users of the area oppose the project.
3. The National Park Service's perspective has been ignored.
4. The proposed road is inadequate.
5. The planning process has been short-circuited.
6. Better routes are available.

I'll elaborate on each of these points:

**1. Local residents oppose the project.** As Alaska State Representative for House District 8, I represent the Denali Borough residents who would be most directly affected by this proposed project. I have heard from many local residents and traveled there recently to meet in person with concerned citizens. Their opposition to this project is virtually unanimous. In addition, the Denali Borough's Mayor, Assembly, and Planning

Commission have all taken formal public positions in opposition to the Stampede Road plan. The Panguingue Creek Homeowners Association has come out in opposition to this project. In pushing this project, the governor has ignored the legitimate concerns of a majority of the local population.

**2. Recreational users of the area oppose the project.** Hikers, campers, hunters, fishermen, birdwatchers, off-road vehicle (ORV) users, mountain bikers, and other outdoor enthusiasts oppose the Stampede Road extension. Even existing tourism enterprises that use the road (e.g., jeep tours, horseback rides, and dog mushing adventures) would gain little, and construction could actually jeopardize their activities.

The proposal is ostensibly intended to increase tourist traffic, but includes no provisions for visitor facilities or even restrooms. Lands adjacent to the proposed Stampede Road extension have high wildlife values, but enjoy no state protection such as parks, waysides, refuges, or critical habitat designations. Little comprehensive planning for the Healy area's tourism future has occurred to date, but significant pre-planning is essential to protect the area's world-class viewsheds, abundant wildlife, many varied uses, and, especially, accommodate the people who live in and enjoy these riches.

**3. The National Park Service's perspective has been ignored.** The National Park Service (NPS) has long advocated for the important habitat values of the area, which include important wintering grounds for caribou and wolves. The state has recognized the area's importance in this regard by declaring areas west of the Savage River off-limits to wolf hunting and trapping, and has closed this area to caribou hunting for many years. The NPS has collected most of the data on soils and wildlife in this area, and places a high value on historic and cultural research to locate important sites. Even though the Park Service has a long, historic connection to the Stampede Road area, the state has virtually ignored them in the road development process. That the state has neglected the NPS is at best a significant oversight and at worst, a serious insult to an important agency partner.

**4. The proposed road is inadequate.** DOT&PF's proposal is for construction of a single lane, 12-foot wide, gravel "pioneer road" with pullouts, bridges, and culverts – hardly an adequate facility to provide reasonable access to the Park and Preserve, even in the best of circumstances. But the apparent route is rife with blind corners, steep grades, and hazardous approaches that reduce the plan from “hardly adequate” to “eminently dangerous.”

The National Park Service's (NPS) 1997 "Denali National Park and Preserve North Access Feasibility Study" from 1997 draws several conclusions relevant to the present proposal, especially regarding use of "pioneer roads":

*"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 a higher overall construction cost 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."*

and

*"Alaska Department of Transportation and Public Facilities were 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. ADOT has a rule of thumb that any road with an average daily traffic volume of more than 300 should be paved. At over 300 there is inadequate time between vehicles for the dust to clear and visibility becomes a problem. 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]."*

DOT&PF contradicts its own past policy in proposing to build a 12-foot-wide pioneer road, especially in light of expected tourist traffic loads (the NPS report said "Projections using state traffic estimates and assuming a minimum ridership per vehicle indicate that a north access road would be used by more than 247,000 people per year"), present-day political scrutiny of government budgets, and widespread desire to avoid waste in transportation projects.

Finally, it would be irresponsible for the DOT&PF to proceed with a project intended to attract more traffic to the Stampede Road without first addressing the significant safety problems present on the first four miles of that road. Foremost among these concerns is the intersection of the Stampede Road with the Parks Highway, which is improperly aligned properly and lacks designated turn lanes.

The first four miles of the Stampede Road were recently chip sealed. Two of these four miles pass through a large residential subdivision and are posted at a 20 MPH speed

limit because of numerous blind corners, steep hills, and driveways. This section of the Stampede Road is clearly not adequate for the anticipated increase in traffic the project is intended to produce.

**5. The planning process has been short-circuited.** The fact that DOT&PF seeks a 1000-foot wide construction corridor to ultimately evolve into a 100-foot wide easement containing a 12-foot wide road is further evidence the proposed project is neither carefully nor thoroughly planned. DNR should deny any permits until the applicants figure out exactly where they want to put their roads. In this instance, requiring DOT&PF to complete their ongoing northern access study would be a prudent first step.

Meanwhile, DOT&PF is in the middle of a \$1.6 million study of potential access routes into Denali from the north. Even though the study is incomplete, DOT&PF has already spent about \$1 million on engineering and preliminary work on the Stampede Road. By overenthusiastically promoting this ill-advised route, the governor is preemptively discarding the conclusions of this study. Rushing to construction without careful planning is no way to promote projects.

**6. Better routes are available.** At my recent town hall meeting in Healy, many of my District 8 constituents not only expressed serious concerns with this project, but mentioned a variety of more appropriate routes both for access to the Park and Preserve, but to points further west. I assume the DOT&PF study will reveal those alternatives, and they should be considered carefully. The only way to insure the best route is chosen is to suspend or end the Stampede Road plan.

Even Denali Borough residents who were less than enthusiastic about new roads in general told me they weren't necessarily opposed to road access to the west, but they are definitely opposed to this particular route. Their reasoning is sound and their conclusion valid – this route is not suitable and should be scrapped. I stand with my constituents and urge you to reject DOT&PF's permit application.

Thank you for the opportunity to share concerns on behalf on my constituents.

Best regards,



Representative David Guttenberg