



Monday, August 10, 2015

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### **Board of Directors**

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Denali National Park and Preserve  
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Dear Superintendent Striker,

On behalf of the Board of Denali Citizens Council and our more than 300 members, thank you for the opportunity to submit comments on the Environmental Assessment for Expansion of the 5 Mile Pit and Rehabilitation of the 7 Mile Pit. We support, in concept, the closure of 7 Mile and, in concept, the expansion of 5 Mile. We have some suggestions on items not fully addressed in the EA and will request, below, additional information and monitoring that we think will ensure that a true Finding of No Significant Impact (FONSI) can be made.

#### **1. Purpose and Need**

- a. To close a pit (7 Mile) where maintenance activities could impact wildlife activity (nearby wolf den) – we agree, but have some suggestions regarding the actual process, below.
- b. To expand a pit (5 Mile) to accommodate expected laydown and storage needs of park maintenance crews – we support this idea in concept, although little detailed information is available on NEPA compliance required for any future uses. Although we appreciate that the convenience of contractors is important, and siting equipment closer to projects lessens the impact of contractor vehicles and equipment on the park road, we are concerned regarding the re-purposing of areas not defined as more than a 'turnout or parking area' historically, to major industrial road support activities.

#### **In the FONSI please include the following:**

- i. **If included in the wilderness exclusion, please indicate what Development Subzone status the 5 Mile pit has received. According to the Entrance Area and Road Corridor DCP, Volume 1, p. 275, gravel pits at Miles 5 and 7 would be designated D-2, which does not allow offices, housing, or commercial facilities, and only allows smaller structures.**
- ii. **Indicate what activities potentially slated to occur at 5 Mile pit would require additional evaluation under NEPA, such as activities that could move it beyond the D-2 descriptor.**
- iii. **Indicate whether noise-making equipment, such as crushers, running engines and portable generators is allowable under the Development Subzone D-2 descriptor, and under what conditions.**
- iv. **List the 1997 Entrance Area and Road Corridor DCP in the References for this EA.**

## 2. Wilderness exclusion

- a. We agree that the intent of Congress, as expressed in the Federal Register notice of September 30, 1992, p. 45183, allows the wilderness boundary to begin 150 feet from the edge of all existing (December 2, 1980) “turnouts and parking areas”, and that Mile 5 existed as a “turnout or parking area” as of December 2, 1980. This would mean that the area proposed for expansion of the 5 Mile pit, and the pit itself, are considered part of the wilderness exclusion portion of the road corridor, something that was not specifically identified in 1992.
- b. In addition, we agree that 7 Mile pit, after reclamation, should be returned to the status of Wilderness, despite its listing in 1992 as part of the wilderness exclusion.

**In the FONSI please include the following:**

- i. **Include a map depicting that portion of 7 Mile pit that will be returned to designated Wilderness. What is the acreage slated for reclamation; what acreage is slated for return to designated Wilderness?**
  - ii. **Describe the legal process that will be used to return the reclaimed area of 7 Mile pit to Wilderness status, giving a timeline for this process to be completed. A commitment to this process would ensure that 7 Mile pit would be permanently unavailable for future development-related activities.**
  - iii. **Indicate the maximum possible acreage of 5 Mile pit. We assume that this EA authorizes maximum buildout of this pit, up to the authorized boundaries with designated wilderness, within the parameters of use appropriate to its Development Zone designation.**
- c. We note that on page 6, the EA states that “The official boundary description (1992) does not list the 1980 ‘turnouts and parking areas,’ and published maps showing the Wilderness boundary do not depict those areas.” We ask that NPS make a commitment to perform an inventory of all such areas remaining unspecified along the park road and develop a protocol for how to address their status. It is likely that not all ‘turnouts and parking areas’ that pre-existed ANILCA should be allowed to trigger the expansion of the wilderness exclusion zone along the park road, or repurposing above and beyond Development Zone designation.

3. **Alternative 2 – Action Alternative.** Expand 5 Mile Pit on the west side by up to 2.4 acres, to occur in the fall of 2015. Decommission and rehabilitate 7 Mile Pit. We accept this alternative in concept, with a few suggestions.

**In the FONSI please include the following:**

- i. **Add more specifics about the program of wildlife monitoring at 7 Mile pit that will help determine the rehabilitation schedule. Identify someone from Resources as a consultant on this EA. Address also any habituation of wolves to both 7 Mile and 5 Mile and how NPS will monitor it and control for impacts of both the expansion and rehabilitation activities.**
- ii. **Note that DCC members advocate for utmost protection of wolves who currently den at 7 Mile pit. If the park is interested in maintaining wolf-viewing opportunities, any disturbance to wolves at 7 Mile pit could be eliminated by moving forward with the**

expansion at 5 Mile, but postponing 7 Mile reclamation work until the den site has not been used in 1-2 years, whether 2019 or even later.

- iii. Describe the “reject material” from the 2016 paving project that will be used to reclaim 7 Mile. We assume it will be gravelly soil and not pure asphalt reject. Indicate how the chosen material **will be optimum** for site reclamation.
- iv. Describe “revegetation efforts” at 7 Mile pit in more detail. What is meant by “organics and topsoil” from 5 Mile project? We assume it will be placed over the gravelly soil used to re-contour the pit. If in the opinion of wildlife researchers the revegetation activities cannot occur for a number of years, will the “organics and topsoil” from 5 Mile pit be stored somewhere, and are these materials expected to survive the interim? Will the revegetation materials from 5 Mile pit be sufficient for full revegetation of 7 Mile, and if not, from what alternative sources will they be chosen?

#### 4. Cumulative impacts

We are concerned regarding the possibility that heavy industrial types of uses could eventually be permitted at a small gravel pit along the park road, one that should have a minimalist D-2 designation and be absent noise-making equipment and heavy industrial-type activities (unless very temporary, with strict guidelines). Although this area is currently described for “storage” and “laydown” uses, what guarantee can NPS provide that ‘mission drift’ will not occur during upcoming paving projects and into the future?

Thank you again for the opportunity to provide comments on this EA. Our concerns reflect DCC’s ongoing commitment to the special character of the park road and its associated infrastructure, the importance of nearby wilderness lands, and the integrity of wildlife whose habitat includes the project area.

Sincerely,

/s/ Nancy Bale

/s/ Hannah Ragland

DCC Board of Directors