



ALASKA MINERS ASSOCIATION, INC.

3305 Arctic Blvd., #202, Anchorage, Alaska 99503 • (907) 563-9229 • FAX: (907) 563-9225 • www.alaskaminers.org

November 14, 2003

Mr. Mike McKinnon
Senior Planner
Alaska State Department of Transportation
3132 Channel Drive, Suite 200
Juneau AK 99801

FAX 907-465-6984

RE: Draft Northwest Alaska Transportation Plan

Dear Sirs,

The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry. The AMA is composed of individual prospectors, geologists and engineers, vendors, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, etc. Our members live and work throughout the state including all across Northwest Alaska.

Transportation infrastructure is a crucial part of all resource development. For hard minerals that usually translates into roads, rail and port transportation infrastructure. Without these, the private sector is seldom able to start new mines and create the jobs and local economic opportunities that follow. Western Alaska does not have timber to harvest, it does not have known economic reserves of oil & gas, it does not have tourism opportunities that will provide year around sustainable jobs, its fishing opportunities are limited at current levels at the very best, and it does not have any reason for government to spend large sums that will sustain the area over many decades. However, Western Alaska does have rocks! Some contain gold, silver, copper, zinc, lead, platinum, etc. and other areas have tremendous coal reserves! These rocks must be the focus of transportation infrastructure for this region.

Thank you for the opportunity to comment on this Draft Transportation Plan. It is clear that a lot of work has gone into development of this Draft Plan. Our comments should be taken as improving the plan and are divided into general and specific comments.

General Comments

1. Report format - The two column format is not logic/user friendly and results in it being more difficult to follow the flow of the information than if organized into a simple page to page format. Also, it is not clear whether this is the Community Transportation Analysis (CTA) and the Resource

Transportation Analysis (RTA) or just the former. Are both of these covered by this document or is this Draft Plan? If there are two items the context must be defined at the start of both the CTA and the RTA. However, why would these be separate when the issues are inseparable? All infrastructure must serve the needs of both communities and resource development and it appears to add confusion to break them apart into two separate reports.

2. Purpose and goals - The purpose and goals of the Plan are not clearly defined. Chapter 1 attempts to define these in paragraph format but the reader must dig them out. If these are not clear how will the agency or the public know if they are being addressed properly? These should be listed in bullet format so they are not lost in the wordiness. I can find these in the document but they are not clearly spelled out. It appears that the purpose and goals are for an infrastructure system that will:

1. Lower the cost of living in the region.
2. Improve access between villages to allow centralized facilities such as regional ports, airports, health care, schools, hub cities where economies of scale will allow for larger stores and expanded businesses and services, etc.
3. Provide infrastructure that will encourage development of natural resources of the area.
- 4.

3. Focus on the purpose and goals - Much of the discussion in the Draft Plan is peripheral to or even outside the purpose and goals. Remove as much of this as possible and focus on the list above.

4. Include all primary road, rail, port, etc. alternatives - All of the primary infrastructure alternatives should be included and shown on the maps. Many will not be feasible at this time but should none the less be identified. This will allow future consideration of these alternatives when demographics change, new resource deposits, new concepts, new construction techniques, etc. become available. This will give what today are lesser alternatives a "place holder" to ensue that are not lost in the discussions of the future. Also, it will help to alert the public when encroachment of proposed land use restrictions, such as the Beringia International Park, may impact infrastructure alternatives for the region.

5. Keep the plan flexible - Similar to the comment above, it is important that the Plan not limit future options. It is possible, if not likely, that in the future bypass mail will be eliminated, power cost equalization payments will be eliminated and other currently existing benefits for rural residents will be eliminated. If these things occur, no one knows the extreme changes that will be needed to allow Alaskans to live and prosper in rural Alaska. Also, the impact of Senator Stevens must not be forgotten. This includes the direct impacts on rural Alaska, but also the indirect impacts that will occur when +/- \$1.5 billion per year coming to Alaska begins to decrease. Less federal money to any area of the state will mean pressure on other areas of the state to make up for the change.

Specific Comments

1. Section 1.1.3 - Mineral/Energy Resource Development - Only “three major resource development zones” are listed. This is wholly inadequate and incorrect. Yes, the “North Slope oil/gas, the western Arctic coal and zinc mining areas and the Yukon Kuskokwin River’s gold area” are three major zones. However, there are many more such zones. No mention is given of: the Ambler copper district, the Seward Peninsula gold district, the Seward Peninsula poly metallic opportunities, the Nome area placer gold deposits, or the massive gravel deposits at various locations or the armor stone resources at Cape Nome.
2. Section 1.2 - Existing Transportation System - The Red Dog port is mentioned but not the Nome, Port Clarence or St. Michael port areas.
3. Section 1.2 - Recommendation 1 - How can this be a recommendation? This is a factor that we must consider. These are current opinions that must be considered but likely does not reflect the attitude of most of the residents of the region or of the State. What happens when General Comment 5 above occurs? A recommendation like this could have the effect of killing any future consideration for such a road. If such a comment is included in this Plan, those wishing to keep Alaska one big park will throw this recommendation from the “official NW Alaska Transportation Plan...” back in our faces for the next 50 years. A specific listing of roads should be recommended.
4. Section 1.2 - Recommendation 2 - This needs to be defined and referenced to Map 5-1. The road route needs to be the first sentence in the recommendation. The discussion on this item proves the need for changing the entire Draft Plan in accordance with General Comments 4 and 5 above - attitudes change over time.
5. Section 1.2 - There are no other recommendations for building roads or at least study of road alternatives? Other recommendations should include building, design or future evaluation of:
 1. A road from Nulato to the DeLong Mountain Transportation System (DMTS).
 2. A road from Kivalina to DMTS.
 3. A road from Point Lay and the NW Arctic coal fields to DMTS.
 4. A road from Kotzebue to Kiana to Ambler to Shugnak to Kobuk. Some segments of this route may not be wanted now but they may in the future and they must not be summarily dropped. Mention which segments have wide spread support and which do not at this time.
 4. A road from Council to White Mountain to Golovin to Elim, and Council to Koyuk (shown on Map 5-1) to Shaktoolik to Unalakleet to St. Michael. Some of these segments are in Table 5-6 but they are not in a Recommendation. Why is that the case?
 5. A road from Koyuk to Buckland to Candle to Deering. Also, add the same segment comment as item above.
 6. A road from Unalakleet/St. Michael to Grayling to Anvik. Grayling and Anvik are outside the plan area but the connection must be specified none the less to ensure the route is not lost or neglected. Also, add the same segment comment as item above.
 7. A road from Teller to Brevig Mission to Wales. Also, add the same segment comment

as item above.

8. A road connecting the Ruby road to Poorman to the Takotna/Ophir road system. Part of this too is outside the Plan area but the connection must be mentioned.

9. A road from the Dalton Highway to Bettles (in Table 504) to Kobuk. This is the topic of Recommendation 1 and has been addressed above.

10. A road from the Dalton Highway to Anaktuvuk Pass.

11. A road from Rampart to Eureka. This is already in the current STIP and should be defined as such.

6. Section 1.2 - No recommendations for new ports? There are no recommendations for new ports or port expansions. The only way resources are going to be developed is to have effective ports. The best way to reduce the cost of living in the Plan Area is with improved ports. Other recommendations should include building, design or future evaluation of:

1. Expansion of the Red Dog port. This would allow direct loading of zinc concentrates and coal from the port. This is a crucial step in the long term sequence to develop a railroad from the coal fields of the Western Arctic to a year around port on Norton Sound.

2. Expansion of the port at Nome to accommodate Panamax size vessels and become a potential end point for a future railroad from the Western Arctic coal fields. .

3. Evaluation of Cape Darby as a major port site.

4. Evaluation/design of St. Michael as a major port site.

5. Evaluation of Port Clarence as a major port.

7. Section 1.2 - No railroad recommendations? The coal of the Northwest Arctic can begin with truck haulage to the Red Dog port but large quantities of coal will require a rail link to a year around deep water (Panamax minimum). In many parts of the plan area a single rail line will be much lower cost than a road. A route definition study from the coal fields to Norton Sound is the first step. At a very minimum such a rail route must be included in the Plan to encourage discussion and study of this alternative.

8. Chapter 2. Winter Trails - These trails are important and should be used as an indicator of where roads should be built. Indeed, several of the roads listed in comments above coincide with these trails.

9. Chapter 3. Aviation Plan - No recognition is given to the need for a large airport in the Ambler copper district. If one or more large copper mines are developed in that area (there are four major copper deposits discovered there thus far) they will at some point require a large paved airport that will accommodate C-130 or larger aircraft. Also, no mention is made of a large airport for Noatak which can serve Red Dog when weather prohibits landing at the minesite. This of course is dependent on the road connection between Noatak and the DMTS. These needs to be included in the Plan.

10. Chapter 4. Waterborne Facilities and Operations - This title seems to be inaccurate. Why not just say Ports, Harbors and Shipping? Everyone knows what these terms mean. What are the port

and harbor recommendations? See above list for inclusion.

11. Chapter 5. Roads Plan - Discussion is included on the Yukon River Highway but there is no recommendation. Due to the cost estimates in Table 5-6 it appears that too high a road design standard is being assumed. The standard used should be defined in the Plan. The first step should be to develop roads to the "federal Resource Road" standard, not a higher standard. Upgrades should then be considered later as usage and needs justify. The immediate need is for basic roads that can connect villages and access resource areas so they can be evaluated for development. The other 11 roads listed above should be added to the recommended road list.

Thank you for the opportunity to comment on this Draft Plan.

Sincerely,

A handwritten signature in black ink that reads "Steven C. Borell". The signature is written in a cursive style with a large, stylized 'S' and 'B'.

Steven C. Borell, P.E.
Executive Director