



Northern Alaska Environmental Center
Conservation's Northern Voice

November 11, 2003

Mike McKinnon, Project Manager
Statewide Planning Division
Alaska Department of Transportation and Public Facilities
3132 Channel Drive, Room 200
Juneau, Alaska 99801-7898

RE: Northwest Alaska Transportation Plan

Dear Mr. McKinnon:

Please accept these comments on the Northwest Alaska Transportation Plan on behalf of the Northern Alaska Environmental Center (NAEC). Based in Fairbanks, the NAEC is the nation's most northerly, broad-spectrum environmental advocacy organization. Founded in 1970 by a concerned group of Interior Alaska conservationists, the NAEC has a membership base of more than 1,150 (the majority of whom live in Alaska). The NAEC works to conserve Alaska's stunning natural resources by advocating management and stewardship policies that promote sustainable, responsible practices.

Our concerns about the Northwest Alaska Transportation Plan focus on chapter five of the plan—the Roads Plan. Throughout this chapter there seems to be a disconnect between the Community Transportation Analysis and the Resource Transportation Analysis (RTA), specifically in the discussion of resource roads. According to the plan (p. 5-9), "Two roads under consideration in the RTA that would potentially benefit communities and inter-community travel are the Dalton Highway to Nuiqsut/National Petroleum Reserve (NPR) Corridor and the Point Lay Coal to Delong Mountain Terminal Corridor at the Red Dog Mine." While these roads potentially offer benefits to surrounding communities, the overwhelming purpose of them is to serve as resource access roads. It seems that Alaskans are being asked to comment on the community benefit aspect of these roads in the Northwest Alaska Transportation Plan without having the benefit of examining the RTA to gain a comprehensive understanding of the implications these roads would have in Northwest Alaska.


According to officials at Alaska DOT, the RTA will not be made available to the public until the end of the year, fully a month after comments are due on the Northwest Alaska Transportation Plan. We do not believe Alaskans can adequately comment on the roads under this circumstance. Therefore, we request one of two suggestions be considered by DOT. First, the Northwest Alaska Transportation Plan be rewritten to comprehensively address both the community and resource aspects of the Dalton Highway to Nuiqsut/National Petroleum Reserve Corridor and the Point Lay Coal to Delong Mountain Terminal Corridor, and then be made available for comment. An alternative choice is to remove those two roads from consideration under the Northwest Alaska Transportation Plan and place all deliberation in the RTA Phase II scheduled for public comment later in the year. The segregation of the two purposes of the roads under current plan is unacceptable and should be changed.


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We thank you for the opportunity to comment on the Northwest Alaska Transportation Plan. Please continue to keep the NAEC updated on transportation developments associated with this and other state plans.

Sincerely,


Mara Bacsujlaky
Assistant Director, Mining Coordinator


Kelly Hill Scanlon
Arctic Coordinator