

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT PALMER

AHTNA, INC

Plaintiff,

vs.

STATE OF ALASKA

Defendant.

Case No. 3PA-08-1600 Civil

Received in the Trial Courts
State of Alaska Third District
at Palmer
SEP 01 2011
By Clerk of the Trial Courts
Deputy

Alaska Department Of Transportation And Public Facilities'
Requested Supplement in Response to Oral Argument

State of Alaska, Department of Transportation, by and through the Office of the Attorney General hereby responds to the Court's inquiries at oral argument on July 19, 2011.

The Court put three questions to counsel.

1. How many Department of Transportation material sites are on the McCarthy Road?
2. How many accesses does Department of Transportation have which allow the public access from the right-of-way (ROW) to publicly owned recreational lands?
3. How many rest areas does Department of Transportation have (or have built) which allow camping?

While the first question was relatively easy to respond to, the second two turned out to be more challenging.

1. How Many State Material Sites Are On The McCarthy Road?

Six active material sites on the McCarthy Road are identified on the Bureau of Land Management (BLM) strip maps, including the material site at issue here.¹ These sites are located from MP 1 to MP 17.5. Two are currently in use, one of which is the

¹ Affidavit of Joe Sullivan.

site at issue here. The other has limited quantities of pit run gravel. Two are not developed. One floods frequently. Two are small and one of those does not have easy access. One only has base course and cannot be used for crushing.

They may be summarized as follows.

Material site #	Milepost	Usage	Comments
850-003-5	1	no	Site is in river and is flooded by copper river frequently
850-004-5	1.5	yes	One of our primary sites for aggregate and sand. Contested by Ahtna.
850-005-5	2	no	On Kotsina river by canyon. Not currently developed. Small site.
850-007-5	2.5	no	On Kotsina river above canyon. Not currently developed. Small site. Impractical unless project in area.
850-001-5	17	no	Lower grade material. Good only if project in area. Only good for base not crushing.
850-008-5	17.5	yes	Primary pit run site. Limited material available.

Department of Transportation applied to BLM for at least six other material site grants in 1974, however the sites were transferred to NPS and the applications were closed without grant. There were two DNR material sites at MP 59.5 and MP 15 which were subject to Department of Transportation contracts until 1980 and 1979 respectively, however those lands were either scheduled for transfer to the University of Alaska or were in fact transferred. In 1995 Department of Transportation applied to DNR for a site at MP 48.5, however the State Historic Preservation Office objected due to the proximity to a trestle. This site has not been pursued.² A private site is located at MP 26.5.

The Second Affidavit of John Hoffman and an Offer of Proof related to a pending Affidavit of Joe Sullivan are attached to support the factual information recited above.³

² Offer of Proof pending submission of Affidavit of Joe Sullivan. Affidavit of Leone Hatch.

³ *Id.*

1
2 **2. How Many Accesses Does Department of Transportation Have**
3 **Which Allow The Public Access From The ROW To Publicly Owned**
4 **Recreational Lands?**

5 The Department does not keep statistics on access to public land from the
6 ROW, including pull-outs, rest areas, waysides, parking lots, and the like. Essentially,
7 if public land is adjacent to the ROW and access is not restricted specifically or
8 otherwise illegal, it is available.⁴ Because the State is not particularly restrictive about
9 access to public resources, it would be challenging to develop a specific and
10 exhaustive list.

11 As counsel noted at oral argument, the Knik River Access
12 is an example of formally developed access near the site of the
13 Palmer Court at MP 30 of the Glenn Highway.⁵ The Knik Access
14 offers parking, an area for boat launching, and a trail head into the
15 Palmer Hay Flats. A depiction of this facility, which was
16 developed with FHWA participation, is to the right.⁶



17 DOT's Exhibit 28 to the motion practice is a list of forty-five of the formal boat
18 launch facilities constructed and/or maintained by the Department of Transportation.
19 While it does not include the many sites where the ROW intersects with navigable
20 water bodies in such a manner as to facilitate the public's enjoyment of riverine
21 uplands or private watercraft,⁷ it does include five freshwater access points. These
22 include: the Big Delta Launch Ramp off the Richardson Highway; the Chatanika
23 Launch Ramp off the [sic] Dalton Highway⁸; the Bethel Small Boat Harbor on the

24 ⁴ For instance, the Dalton Highway corridor is subject to specific access limitations
25 related to off-road vehicles. AS 19.40.210.

26 ⁵ A description may be reviewed at: <http://www.palmerhayflats.org/trails-maps.html>.

⁶ This depiction was obtained at: <http://www.palmerhayflats.org/maps/TRAIL-MAP-REFLECTIONS-LAKE-KNIK-RIVER-ACCESS.pdf>.

⁷ In the Grumpy Grandpa decision, the pull-out in question was popular for fishing
access. As described by the Department in that case, pull-outs are often constructed to
efficiently waste excess material along the side of the road in areas that may be of
interest to the public. DOT Exhibit 36, page 3.

⁸ This reference should probably be the Elliott Highway.

1 Kuskokwim River; the Manley Launch Ramp on the Elliot Highway for the Tanana
2 River; and the Salcha River Launch Ramp off the Richardson Highway.

3 The Northern Region Right of Way section is also informally aware of four
4 other boat launches within the ROW in this region. Specifically: Taylor Highway 40
5 Mile River Bridge at MP 113; Northway Road Moose Creek/Chisana River at MP 0.3;
6 Alaska Highway Tanana River at MP 1303 (The recently replaced Tanana River
7 Bridge also included reconstruction of a boat launch); Dalton Highway at the Yukon
8 River Wayside.⁹

9 **3. How Many Rest Areas Does Department of Transportation Have**
10 **(Or Have Built) Which Allow Camping?**

11 Existing Department of Transportation facilities exactly like that at issue here
12 are rare. However, as is the case with access to public resources, unless restricted or
13 otherwise illegal, camping is not forbidden in pull-outs, waysides, rest areas, and the
14 like.¹⁰ While not definitive or complete, the State does have computerized
15 maintenance records for signage and for more significant pull-outs and sites with trash
16 barrels or toilets. The Maintenance Management System (MMS) reports three
17 hundred and fifty-four scenic turn-outs and rest areas statewide which are associated
18 with the State Scenic Byways program, and sixteen which are off-system.¹¹ Of over
19 40,000 highway signs inventoried thus far for the MMS, only twenty-four "no
20 camping" signs have been identified.¹² Approximately 70% of the State's highway
21 signs have been included in the system to date, including approximately 95% of those
22 in the Northern and Southeast Regions.¹³

23 While (as counsel mentioned at oral argument) the Department of
24 Transportation does not have a formal program to develop campground facilities as

25 ⁹ Affidavit of John F. Bennett.

26 ¹⁰ See 17 AAC 45.045(a).

¹¹ Affidavit of Clark Milne.

¹² These signs do not necessarily relate to camping in the ROW.

¹³ Affidavit of Clark Milne.

1 such pursuant to AS 41.21.805,¹⁴ it has never taken a restrictive view of stopping and
2 camping so long as lawful usage did not interfere with the safe operation of the
3 facility. Therefore, a listing of all facilities within the ROW at which camping is
4 specifically permissible is not available.¹⁵ The attached Second Affidavit of John
5 Hoffman, however, supplies illustrative examples of pull-outs and a rest area on a
6 portion of the Copper River Highway (aka the O'Brien Creek Road) from Chitina to
7 O'Brien Creek for the Court's review. A drive down the Denali Highway in the
8 summer is like to offer similar illustrations.

9 In response to this Court's inquiry, a Department of Transportation employee
10 catalogued forty-two pull-outs, waysides and the like on the McCarthy Road.¹⁶ None
11 are signed to restrict camping, and several of the descriptions note popularity for
12 camping, fishing or hunting.

13 DATED: September 1, 2011

14 JOHN J. BURNS
ATTORNEY GENERAL

15 By:

16 *For* Leone Hatch
Senior Assistant Attorney General
Transportation Section
ABA No. 8506061

0311065

17 Certificate of Service

18 I certify that a true and correct copy
of the foregoing document was
mailed to the following:

19 Howard S. Trickley
20 Law Offices of Jermain Dunnagan & Owens
3000 A Street, Suite 300
Anchorage, Alaska 99503

21 John Baker
22 Senior Assistant Attorney General
Attorney General's Office
1031 W. Fourth Avenue, Suite 200
23 Anchorage, AK 99501

24 Anne Orth

9/1/11
Dated

25 ¹⁴ Formerly AS 41.21.060, renumbered in 1985.

26 ¹⁵ It is not surprising that the Department of Transportation does not make a habit of
developing formal campgrounds under the auspices of AS 41.21.805 because even the
most basic amenities at campground place a demand on the operations budget, which
may not be offset by user fees if FHWA or FAA funds are invested in the construction.

¹⁶ Second Affidavit of John Hoffman.

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT

AHTNA, INC)
)
Plaintiff,)
vs.)
)
STATE OF ALASKA)
)
Defendant.)

Case No. 3PA-08-1600 Civil

AFFIDAVIT OF CLARK MILNE

STATE OF ALASKA)
 : ss.)
THIRD JUDICIAL DISTRICT)

I, Clark Milne, do solemnly swear and affirm that I have personal knowledge of the following, and that it is true to the best of my knowledge.

1. I am Employed by the State of Alaska, Department of Transportation and Public Facilities (Department) as the Maintenance Engineer for the Northern Region.

2. I am responsible for coordination between the Maintenance & Operations group (M&O), and the many other aspects of the Department, such as Design, Construction and Planning. I manage preparation of the M&O budget, oversee the financial system used to control and document maintenance spending, and handle administration of various road/airport repair/upgrade projects.

3. The Maintenance Management System (MMS) is a complicated computer software system that accumulates daily information on M&O maintenance activities: who worked where, doing what activity, with what resources, i.e. what equipment and materials were used or expended. Thus one output of MMS is timesheets. Another important aspect of MMS is a listing of Feature Inventory items, including roadside rest areas, signs, etc.

4. The MMS was brought on as a pilot program in 2004, and fully

implemented by all maintenance stations in Alaska, in 2005. Work activity data is input into the system daily, and the MMS data lists, including feature inventory tables, are updated on an ongoing basis. While the MMS is generally reliable for management purposes, it is not always absolutely definitive due to the immense and potentially changeable nature of the infrastructure it tracks.

5. I requested that data be extracted from the MMS to identify where we have maintain rest areas, scenic pullouts and camping signage.

6. The tabular results for our assets on the State's Department-maintained road system, as indicated by the MMS is summarized as follows:

ASSET_GRP_DESCR	ASSET_DESCR	ROAD_NAME
SCENIC TURNOUTS	GRAVEL TURNOUT @ MP 89.7	GLENN HWY
SCENIC TURNOUTS	PAVED TURNOUT @ MP105.4	GLENN HWY
SCENIC TURNOUTS	PAVED TURNOUT @ MP107.3	GLENN HWY
SCENIC TURNOUTS	GRAVEL TURNOUT @ MP 104.9	PARKS HWY
SCENIC TURNOUTS	PAVED TURNOUT @ MP 126.5	PARKS HWY
SCENIC TURNOUTS	MATANUSKA SCENIC OUTLOOK	GLENN HWY
SCENIC TURNOUTS	MATANUSKA RIVER OUTLOOK	GLENN HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.1	GOLD CHORD RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.2	GOLD CHORD RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.03	KNIK RIVER RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.9	KNIK RIVER RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.3	KNIK RIVER RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 9.7	KNIK RIVER RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 7.4	OLD GLENN @ PALMER
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 8.5	OLD GLENN @ PALMER
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 13.3	OLD GLENN @ PALMER
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 16.3	OLD GLENN @ PALMER
SCENIC TURNOUTS	SINGLE ENT TRNOUT @ MIPT 8.5	PALMER-FISHHOOK RD
SCENIC TURNOUTS	DONUT HOLE @ MIPT 9.1	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 9.4	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 9.5	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 10.4	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 11.4	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 12.0	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 12.8	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 13.1	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 13.4	PALMER-FISHHOOK RD
SCENIC TURNOUTS	DONUT HOLE @ MIPT 14.2	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 14.6	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 15.0	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 15.4	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 15.9	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 16.1	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 16.4	PALMER-FISHHOOK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 17.1	PALMER-FISHHOOK RD

1			
2	SCENIC TURNOUTS	PARKS MILEPOST 195.8	PARKS HWY
3	SCENIC TURNOUTS	PARKS MILEPOST 200.9	PARKS HWY
4	SCENIC TURNOUTS	PARKS MILEPOST 203.6	PARKS HWY
5	SCENIC TURNOUTS	PARKS MILEPOST 207.9	PARKS HWY
6	SCENIC TURNOUTS	PARKS MILEPOST 209.1	PARKS HWY
7	SCENIC TURNOUTS	PARKS MILEPOST 211.6	PARKS HWY
8	SCENIC TURNOUTS	PARKS MILEPOST 213.8	PARKS HWY
9	SCENIC TURNOUTS	PARKS MILEPOST 216.3	PARKS HWY
10	SCENIC TURNOUTS	PARKS MILEPOST 218.5	PARKS HWY
11	SCENIC TURNOUTS	PARKS MILEPOST 219.7	PARKS HWY
12	SCENIC TURNOUTS	PARKS MILEPOST 220.6	PARKS HWY
13	SCENIC TURNOUTS	PARKS MILEPOST 222.2	PARKS HWY
14	SCENIC TURNOUTS	PARKS MILEPOST 229.8	PARKS HWY
15	SCENIC TURNOUTS	PARKS MILEPOST 163.1	PARKS HWY
16	SCENIC TURNOUTS	PARKS MILEPOST 167.4	PARKS HWY
17	SCENIC TURNOUTS	PARKS MILEPOST 170.1	PARKS HWY
18	SCENIC TURNOUTS	PARKS MILEPOST 173.0	PARKS HWY
19	SCENIC TURNOUTS	PARKS MILEPOST 174.1	PARKS HWY
20	SCENIC TURNOUTS	PARKS MILEPOST 176.1	PARKS HWY
21	SCENIC TURNOUTS	PARKS MILEPOST 176.5	PARKS HWY
22	SCENIC TURNOUTS	PARKS MILEPOST 179.5	PARKS HWY
23	SCENIC TURNOUTS	PARKS MILEPOST 180.0	PARKS HWY
24	SCENIC TURNOUTS	PARKS MILEPOST 183.1	PARKS HWY
25	SCENIC TURNOUTS	PARKS MILEPOST 184.9	PARKS HWY
26	SCENIC TURNOUTS	PARKS MILEPOST 187.5	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 191.2	PARKS HWY
	SCENIC TURNOUTS	MCKILEY PARK TURNOUT @ 234.1	PARKS HWY
	SCENIC TURNOUTS	ICEWORM GULCH TURNOUT @ 240.2	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 240.7	PARKS HWY
	SCENIC TURNOUTS	NENANA OVERLOOK @ 241.6	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 242.2	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 242.7	PARKS HWY
	SCENIC TURNOUTS	BISON GULCH TURNOUT @ 243.5	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 244.0	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 246.9	PARKS HWY
	SCENIC TURNOUTS	HEALY TURNOUT @ 248.6	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 259.4	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 262.8	PARKS HWY
	SCENIC TURNOUTS	BEAR CREEK S TURNOUT @ 264.5	PARKS HWY
	SCENIC TURNOUTS	BEAR CREEK N TURNOUT @ 269.3	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 271.4	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 286.7	PARKS HWY
	SCENIC TURNOUTS	TANANA RIV BRIDGE @ 305.1	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 305.9	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 308.7	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 314.6	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 318.7	PARKS HWY
	SCENIC TURNOUTS	PARKS MILEPOST 324.6	PARKS HWY
	SCENIC TURNOUTS	ABANDONED ALIGN PARKS 331.6	PARKS HWY
	SCENIC TURNOUTS	ABANDONED ALIGN PARKS 335.6	PARKS HWY
	SCENIC TURNOUTS	ABANDONED ALIGN PARKS 341.0	PARKS HWY
	SCENIC TURNOUTS	JOHNSON RD BUS PULL OUT MP 5.0	JOHNSON RD
	SCENIC TURNOUTS	RICH MILEPOST 288.1	RICHARDSON HWY

SCENIC TURNOUTS	RICH MILEPOST 289.7	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 294.0	RICHARDSON HWY
SCENIC TURNOUTS	SCENIC VW RICH MILEPOST 296.4	RICHARDSON HWY
SCENIC TURNOUTS	SCENIC VW RICH MILEPOST 297.8	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 298.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 305.4	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 310.0	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 313.0	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 317.9	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 323.7	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 324.7	RICHARDSON HWY
SCENIC TURNOUTS	PARKS MONUMENT TURNOUT @ 344.3	PARKS HWY
SCENIC TURNOUTS	ESTER WEIGH STATION @ 352.0	PARKS HWY
SCENIC TURNOUTS	GLENN MILEPOST 119.0	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 111.8	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 113.1	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 122.1	GLENN HWY
SCENIC TURNOUTS	CHICKALOON TRAILHEAD 126.4	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 129.3	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 122.2	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 133.0	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 133.9	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 135.8	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 137.8	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 155.5	GLENN HWY
SCENIC TURNOUTS	BUFFALO LAKE	GLENN HWY
SCENIC TURNOUTS	TEX SMITH LAKE	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 162.3	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 165.8	GLENN HWY
SCENIC TURNOUTS	GLENN MILEPOST 169.2	GLENN HWY
SCENIC TURNOUTS	RANCH HOUSE LODGE/STA BOUNDARY	GLENN HWY
SCENIC TURNOUTS	RICH MILEPOST 154.2	RICHARDSON HWY
SCENIC TURNOUTS	MIDDLE FORK TRAIL TURN MP 169.	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 174.7	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 180.0	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 180.1	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 182.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH ABAND ALIGN MP184.4	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 189.4	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 189.7	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 192.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 192.6	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 194.1	RICHARDSON HWY
SCENIC TURNOUTS	RICHARDSON MONUMENT MP 197.6	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 197.7	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 198.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 198.6	RICHARDSON HWY
REST AREAS	NABESNA MILEPOST 17.8	NABESNA RD
REST AREAS	NABESNA MILEPOST 21.8	NABESNA RD
REST AREAS	NABESNA MILEPOST 27.9	NABESNA RD
REST AREAS	NABESNA MILEPOST 35.4	TOK CUTOFF HWY

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

REST AREAS	CHISTOCHINA MP 35	TOK CUTOFF HWY
SCENIC TURNOUTS	NABESNA MILEPOST 3.8	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 4.6	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 6.1	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 7	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 8.9	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 9.1	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 11.1	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 12.1	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 12.8	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 13.4	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 13.8	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 14.5	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 15.7	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 16.3	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 16.6	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 18.4	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 18.9	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 19.8	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 20.7	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 22.9	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 23.4	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 24	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 26.5	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 27.6	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 29.2	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 30.9	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 31.1	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 31.8	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 32.7	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 33.5	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 36.3	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 37.8	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 38.1	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 39.7	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 40.4	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 40.8	NABESNA RD
SCENIC TURNOUTS	NABESNA MILEPOST 41.5	NABESNA RD
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 18.2	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 20.9	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 28	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 30.1	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 38.7	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 40.1	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 41.2	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 44.6	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 47	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 55.1	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 56.5	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 63	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 65.5	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 68	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 69.1	TOK CUTOFF HWY

SCENIC TURNOUTS	TOK CUTOFF MILEPOST 73.9	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 77.9	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 85.6	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 88.3	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 89	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 90	TOK CUTOFF HWY
SCENIC TURNOUTS	TOK CUTOFF MILEPOST 91	TOK CUTOFF HWY
SCENIC TURNOUTS	GLENN @ MILEPOST 174.7	GLENN HWY
SCENIC TURNOUTS	WRANGELL HISTORICAL MRK 176.6	GLENN HWY
SCENIC TURNOUTS	RICH @ MILEPOST 124.9	RICHARDSON HWY
SCENIC TURNOUTS	RICH @ MILEPOST 126.0	RICHARDSON HWY
SCENIC TURNOUTS	RICH @ MILEPOST 130.0	RICHARDSON HWY
SCENIC TURNOUTS	RICH @ MILEPOST 132.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH @ MILEPOST 138.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH @ MILEPOST 139.4	RICHARDSON HWY
SCENIC TURNOUTS	RICH @ MILEPOST 140.6	RICHARDSON HWY
SCENIC TURNOUTS	RICH @ MILEPOST 141.4	RICHARDSON HWY
SCENIC TURNOUTS	RICH @ MILEPOST 147.0	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 240.4	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 241.3	RICHARDSON HWY
SCENIC TURNOUTS	PIPELINE SCENIC VIEW @ 246.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 243.8	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 252.7	RICHARDSON HWY
SCENIC TURNOUTS	TANANA RIV TURNOUT @ 275.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 278.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 280.4	RICHARDSON HWY
REST AREAS	AK HWY WAYSIDE MP 1288	ALASKA HWY
REST AREAS	ALASKA RANGE VIEW REST AREA	ALASKA HWY
SCENIC TURNOUTS	SINGLE ENT TRNOUT @ MIPT 63.0	ALASKA HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 65.2	ALASKA HWY
SCENIC TURNOUTS	SINGLE ENT TRNOUT @ MIPT 65.6	ALASKA HWY
SCENIC TURNOUTS	SINGLE ENT TRNOUT @ MIPT 68.4	ALASKA HWY
SCENIC TURNOUTS	TURNOUT @ MIPT 69.7	ALASKA HWY
SCENIC TURNOUTS	SINGLE ENT TRNOUT @ MIPT 78.6	ALASKA HWY
SCENIC TURNOUTS	TURNOUT @ MIPT 84.6	ALASKA HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 106.0	ALASKA HWY
SCENIC TURNOUTS	TURNOUT @ MIPT 106.5	ALASKA HWY
SCENIC TURNOUTS	TURNOUT @ MIPT 126.4	ALASKA HWY
SCENIC TURNOUTS	SINGLE ENT TRNOUT @ MIPT 133.2	ALASKA HWY
SCENIC TURNOUTS	TURNOUT @ MIPT 134.6	ALASKA HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 0.9	TAYLOR HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 2.6	TAYLOR HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 4.3	TAYLOR HWY
SCENIC TURNOUTS	TURNOUT @ MIPT 5.9	TAYLOR HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 9.9	TAYLOR HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 12.1	TAYLOR HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 15.3	TAYLOR HWY
SCENIC TURNOUTS	TURNOUT @ MIPT 15.8	TAYLOR HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 18.2	TAYLOR HWY
SCENIC TURNOUTS	TURNOUT @ MIPT 18.9	TAYLOR HWY
SCENIC TURNOUTS	SINGLE ENT OVRLK @ MIPT 21.1	TAYLOR HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 21.6	TAYLOR HWY
SCENIC TURNOUTS	CONST STAGING AREA @ MIPT 27.5	TAYLOR HWY

SCENIC TURNOUTS	TURNOUT @ MIPT 31.9	TAYLOR HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 33.4	TAYLOR HWY
SCENIC TURNOUTS	DONUT HOLE @ MIPT 97.2	TOK CUTOFF HWY
SCENIC TURNOUTS	TURNOUT @ MIPT 100.9	TOK CUTOFF HWY
SCENIC TURNOUTS	TURNOUT @ MIPT 102.2	TOK CUTOFF HWY
SCENIC TURNOUTS	RICH MILEPOST 203.9	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 204.5	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 206.0	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 207.0	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 208.1	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 208.4	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 209.1	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 211.6	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 213.2	RICHARDSON HWY
SCENIC TURNOUTS	WILDLIFE VIEWING @ 214.0	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 215.0	RICHARDSON HWY
SCENIC TURNOUTS	PIPELINE VIEW @ 215.9	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 216.8	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 217.1	RICHARDSON HWY
SCENIC TURNOUTS	TRIMS STATION TURNOUT @ 218.3	RICHARDSON HWY
SCENIC TURNOUTS	MICHAEL CREEK BRIDGE @ 219.8	RICHARDSON HWY
SCENIC TURNOUTS	LOWER SUZY 1 CREEK @ 224.4	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 225.1	RICHARDSON HWY
SCENIC TURNOUTS	BLACK RAPIDS GLACIER @ 225.2	RICHARDSON HWY
SCENIC TURNOUTS	INFO BOARD @ 225.4	RICHARDSON HWY
SCENIC TURNOUTS	TURNOUT @ MILEPOST 226.0	RICHARDSON HWY
SCENIC TURNOUTS	SCENIC VIEW @ 230.3	RICHARDSON HWY
SCENIC TURNOUTS	DARLING CREEK @ 231.0	RICHARDSON HWY
SCENIC TURNOUTS	TURNOUT @ MILEPOST	RICHARDSON HWY
SCENIC TURNOUTS	BEAR CREEK @ 233.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 234.2	RICHARDSON HWY
SCENIC TURNOUTS	RICH MILEPOST 234.4	RICHARDSON HWY
SCENIC TURNOUTS	RUBY CREEK @ 234.8	RICHARDSON HWY
SCENIC TURNOUTS	DONNELLY CREEK @ 237.9	RICHARDSON HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.2	9 MILE CREEK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.6	AUKE REC RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 3.5	BACK LOOP RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.1	CHANNEL VISTA DR
SCENIC TURNOUTS	MENDENHALL WETLANDS	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	AUKE LK WIDE SHLDR @ MIPT 10.7	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	AUKE LK DONUT HOLE @ MIPT 10.8	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 11.0	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 13.4	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 13.5	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 17.7	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 18.2	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 18.3	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 20.2	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 21.1	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	SHRINE OF ST THERESE	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 22.1	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	SCHOOL BUS TURNOUT @ MIPT 24.7	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 25.9	EGAN DRIVE/GLACIER HWY

SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 27.5	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 28.0	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 30.4	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 31.3	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 31.4	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 31.7	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 31.8	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 33.1	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 33.9	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 34.0	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 34.1	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 34.2	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	PT BRIDGET TRAILHEAD	EGAN DRIVE/GLACIER HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.8	ENGINEERS CUTOFF RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.0	ENGINEERS CUTOFF RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.4	FRITZ COVE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 2.2	FRITZ COVE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 2.4	FRITZ COVE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.03	GLACIER HWY/WILLOUGHBY AV
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.1	GLACIER HWY/WILLOUGHBY AV
SCENIC TURNOUTS	DONUT HOLE @ MIPT 0.5	GLACIER HWY/WILLOUGHBY AV
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 3.5	MENDENHALL LOOP RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.8	MONTANA CREEK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.3	MONTANA CREEK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.5	MONTANA CREEK RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.9	MONTANA CRK/SKATERS CABIN
SCENIC TURNOUTS	WIDE SHOULDER @ FISH CREEK RD	NORTH DOUGLAS HWY
SCENIC TURNOUTS	SCHOOL BUS TURNOUT @ MIPT 8.1	NORTH DOUGLAS HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 8.7	NORTH DOUGLAS HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 8.8	NORTH DOUGLAS HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 9.3	NORTH DOUGLAS HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 9.4	NORTH DOUGLAS HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 10.4	NORTH DOUGLAS HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 10.4	NORTH DOUGLAS HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 11.2	NORTH DOUGLAS HWY
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 0.8	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.3	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.34	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.4	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.43	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.7	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.8	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 1.9	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 2.4	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 2.5	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 2.7	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 2.8	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 3.0	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 3.1	THANE RD

SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 3.3	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 3.6	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 3.7	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 3.8	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 4.2	THANE RD
SCENIC TURNOUTS	WIDE SHOULDER @ MIPT 5.4	THANE RD

7. The tabular results for assets listed, but not on the State's Department-maintained road system, as indicated by the MMS is summarized as follows:

ASSET_DESCR	OFF_SYS_DESCR	UPDT_DATE	PREV_UPDT_DATE
LADY BIRD REST AREA	RICHARDSON HWY MILEPOST 188.4	Jun/17/2005	May/31/2005
FISH CREEK REST AREA	RICHARDSON HWY MILEPOST 190.5	Jun/17/2005	Jun/06/2005
EAST FORK CHULITNA WAYSIDE	PARKS HWY MILEPOST 185.5	Jun/17/2005	May/31/2005
NENANA RIV PARKS MIPOST 238.1	NENANA RIV PARKS MIPOST 238.1	Jun/04/2009	Jun/04/2009
JUNE CREEK @ PARKS MIPOST 269	JUNE CREEK @ PARKS MIPOST 269	Jun/04/2009	
BIRCH LAKE REST AREA	MILEPOST 305.8 RICHARDSON HWY	Jun/17/2005	Jun/06/2005
FORT GREELY	RICHARDSON HWY MILEPOST 262.5	Jun/17/2005	Jun/08/2005
REST AREA @ MILEPOST 152.6	GLENN HWY MILEPOST 152.6	Jun/17/2005	Jun/09/2005
CHICKALOON TRAILHEAD	GLENN HWY MILEPOST 118.4	Jun/17/2005	Jun/17/2005
LAKE LOUISE	LAKE LOUISE RD MILEPOST 20	Jun/17/2005	Jun/17/2005
BILLY MITCHELL	MILEPOST 62 RICHARDSON HWY	Jun/15/2005	
CHITINA AIRPORT	EDGERTON HWY MILEPOST 32	Jun/17/2005	
COPPER RIVER	EDGERTON HWY MILEPOST 37	Jun/17/2005	
CHITINA DIP NET	COPPER RIVER AREA	Jun/17/2005	
MILE 7 DENALI CAMPGROUND	MILE 7 DENALI CAMPGROUND	Aug/10/2010	

8. During 2010 and 2011 we inventoried about 65% of the signs in the State (roughly 44,000 so far), which represents approximately 95% completion of the assemblage of signs throughout the Department's Northern and Southeast Regions, and 60% of the Central Region's signs.

9. Twenty-four "No Camping" signs have been identified so far in the MMS. They are summarized as follows:

Mileage	ROAD_NAME	SIDE OF ROAD	LEGEND
3.592689	MENDENHALL LOOP RD	Right	NO CAMPING AREA CLOSED
0.04176		Left	NO OVERNIGHT RV PARKING
4.696345	LUTAK RD	Right	NO CAMPING OR OVERNIGHT PARKING
4.861778	LUTAK RD	Right	NO OVERNIGHT PARKING OR CAMPING
4.73999	LUTAK RD	Left	NO CAMPING OR OVERNIGHT PARKING

0.020887 94	CHILKOOT LAKE RD	Right	No Camping or Overnight Parking Along The Chilkoot River Except In The Established Campground
1.01869	CHILKOOT LAKE RD	Left	NO CAMPING OR OVERNIGHT PARKING
	Sign assembly # N51039_03		NO OVERNIGHT CAMPING
0.451628 8	ABERCROMBIE DR		NO CAMPING OR SLEEPING IN VEHICLES IN THIS AREA
0.326006 25	ABERCROMBIE DR	Right	NO CAMPING OR SLEEPING IN VEHICLES IN THIS AREA
0.0064	EGAN DR	Left	NO OVERNIGHT CAMPING
138.473	STERLING HWY	Left	NO OVERNIGHT PARKING OR CAMPING
	Sign assembly # N18445_02		NO OVERNIGHT CAMPING
0.089624 32	WORTHINGTON GLACIER RD	Right	NO CAMPING
309.5888	RICHARDSON HWY	Right	NO CAMPING (SYMBOL)
309.6238	RICHARDSON HWY	Right	NO CAMPING (SYMBOL)
208.1198	PARKS HWY	Left	NO CAMPING
21.4945	PARKS HWY	Right	NO CAMPING
205.3947	PARKS HWY	Right	NO CAMPING
207.7196	PARKS HWY	Right	NO CAMPING
207.9783	PARKS HWY	Left	NO CAMPING
1.127674 36	WILLOW FISHHOOK RD	Right	NO CAMPING
	Airport Rd	Right	No Camping

Further your affiant sayeth naught.

Clark Milne

Clark Milne

SUBSCRIBED AND SWORN to before me this 1st day of September, 2011.

Cynthia L. Bills

Notary Public, State of Alaska

My commission expires: *with office*



IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT PALMER

AHTNA, INC)
)
Plaintiff,)
vs.)
)
STATE OF ALASKA)
)
Defendant.)
Case No. 3PA-08-1600 Civil

SECOND AFFIDAVIT OF JOHN F. BENNETT, PLS, SRWA

STATE OF ALASKA)
 : ss.
THIRD JUDICIAL DISTRICT)

I, John F. Bennett, do solemnly swear and affirm that I have personal knowledge of the following, and that it is true to the best of my knowledge.

1. I am the Northern Region Right of Way Chief for the Alaska Department of Transportation and Public Facilities. I am also a licensed surveyor in the State of Alaska. I have been with the department of Transportation for 26 years.

2. As Chief of the Right of Way section, I am familiar with many of the uses of Right-of-Way in the Northern Region. I am aware of the following boat launches within our right-of way:

- a. Taylor Highway 40 Mile River Bridge at MP 113;
- b. Northway Road Moose Creek/Chisana River at MP 0.3;
- c. Alaska Hwy Tanana R. at MP 1303 – The recently replaced Tanana River Bridge also included reconstruction of a boat launch;
- d. Dalton Highway at the Yukon R. Wayside

/

/

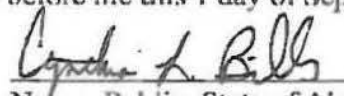
/

STATE OF ALASKA
DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
100 CUSHMAN, SUITE 400
FAIRBANKS, ALASKA 99701
PHONE: (907) 451-2811
FAX: (907) 451-2846

Further your affiant sayeth naught.


John F. Bennett

SUBSCRIBED AND SWORN to before me this 1 day of September, 2011.


Notary Public, State of Alaska
My commission expires: *with office*



1
2 IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
3 THIRD JUDICIAL DISTRICT AT PALMER

4 AHTNA, INC)

5 Plaintiff,)

6 vs.)

7 STATE OF ALASKA)

8 Defendant.)

Case No. 3PA-08-1600 Civil

9 AFFIDAVIT OF M. LEONE HATCH

10 I, Leone Hatch, being first duly sworn, deposes and says:

11 1. I am a Senior Assistant Attorney General in the Transportation Section of
12 the Department of Law. I represent the appellant State of Alaska in this litigation.

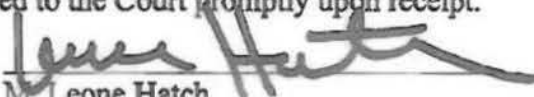
13 2. During the time allotted for the preparation of the Response to the Court's
14 inquiries during the Oral Argument on July 19, 2011, I suffered an accident that resulted
15 in a concussion and related injuries. Due to this event, I was absent from work for a
16 week and unable to work from home.

17 3. During my absence, Joe Sullivan left the State on leave and became
18 unavailable to endorse his affidavit. He will return in two to three weeks.

19 4. The attached unsigned Affidavit of Joe Sullivan is submitted as an offer of
20 proof. When he is available to endorse his affidavit with any necessary edits, it will be
submitted to the Court.

21 /
22 /
23 /
24 /
25 /
26 /
/

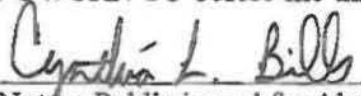
1
2 5. Also due to my unplanned absence, it was not possible to finalize the
3 affidavits of Mr. Hoffman, Mr. Bennett and Mr. Milne in time to submit originals to the
4 Palmer Court. The originals will be mailed to the Court promptly upon receipt.

5 
M. Leone Hatch

6 SUBSCRIBED AND SWORN TO before me this 1st day of September,
7 2011.



20
21
22
23
24
25
26


Notary Public in and for Alaska
My Commission Expires: with office

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT PALMER

AHTNA, INC)
)
Plaintiff,)
vs.)
STATE OF ALASKA)
)
Defendant.)
Case No. 3PA-08-1600 Civil

AFFIDAVIT OF JOSEPH P. SULLIVAN

STATE OF ALASKA)
: ss.)
THIRD JUDICIAL DISTRICT)

I, Joseph P. Sullivan, do solemnly swear and affirm that I have personal knowledge of the following, and that it is true to the best of my knowledge.

1. I am a Right of Way Agent for the State of Alaska Department of Transportation and Public Facilities. I have managed the Northern Region's material sources from 2007 to the present.

2. I have reviewed my files and have confirmed that there are six active material sites on the McCarthy Road, all of which are non-expiring right of way grants from the federal government. Ahtna, Inc is the underlying landowner on three of them. The other two are on National Park Service land.

3. There is a privately owned material site at MP 26.5 which we have occasionally used in the past.

4. There are nine material sites on the McCarthy Road noted in our records which are not available. The nine unavailable sites include six which were applied for but not granted, two which became unavailable due to transfer issues, and one which was considered but may threaten a historic resource, specifically as follows.

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT

AHTNA, INC)
)
Plaintiff,)
vs.)
)
STATE OF ALASKA)
)
Defendant.)
Case No. 3PA-08-1600 Civil

SECOND AFFIDAVIT OF JOHN R. HOFFMAN

STATE OF ALASKA)
 : ss.)
THIRD JUDICIAL DISTRICT)

I, John R. Hoffman, do solemnly swear and affirm that I have personal knowledge of the following, and that it is true to the best of my knowledge.

1. I am Employed by the State of Alaska, Department of Transportation and Public Facilities (Department) as the Maintenance and Operations Superintendent for the Tazlina District.

2. I am responsible for the supervision of the maintenance of State roads within the Tazlina District.

3. The attached spreadsheet is an inventory of waysides and pullouts on the McCarthy Road prepared by a member of my staff. Trash collection and toilets are only available at the wayside at issue in this litigation. Camping is allowed at sites with sufficient room off the shoulder of the roadway and is not posted for a time

1
2 limitation per 17 AAC 05.045.

3 4. The photographs below were taken July 26, 2011 along O'Brien Creek
4 Road from Chitina to O'Brien Creek by a member of my staff.
5

6 a. MP 1.2 is an area used for camping.



17 b. MP 1.25 is an area used for camping.



c. State maintained waste barrel at MP 1.25.



d. MP 1.4 is an area used for camping.



e. MP 1.5 also supports an area used for camping.



f. Outhouse equipped wayside at MP 1.85 which supports camping.



STATE OF ALASKA
DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
100 CUSHMAN, SUITE 400
FAIRBANKS, ALASKA 99701
PHONE: (907) 451-2811
FAX: (907) 451-2846



g. State maintained waste barrel at MP 2.1 by parked trailer and four-wheelers.



h. Main area at end of road, MP 2.7.



STATE OF ALASKA
DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
100 CUSHMAN, SUITE 400
FAIRBANKS, ALASKA 99701
PHONE: (907) 451-2811
FAX: (907) 451-2846





5. Copper River access, (without boat launching due to the incline of the bank), is available at the north-east end of the road right-of-way at the end of O'Brien Creek Road. Boat operators may launch elsewhere and pick up passengers there.

6. Road maintenance requires access to several different types of sand and gravel.

7. The McCarthy Road is within my district, and I am familiar with the

Material Sites along it.

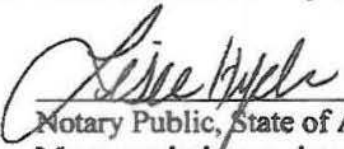
8. The following spreadsheet describes the six available DOT&PF McCarthy Road Material sites.

Material site #	Milepost	Usage	Comments
850-003-5	1	no	Site is in river and is flooded by copper river frequently
850-004-5	1.5	yes	One of our primary sites for aggregate and sand. Contested by Ahtna.
850-005-5	2	no	On Kotsina river by canyon. Not currently developed. Small site.
850-007-5	2.5	no	On Kotsina river above canyon. Not currently developed. Small site. Impractical unless project in area.
850-001-5	17	no	Lower grade material. Good only if project in area. Only good for base not crushing.
850-008-5	17.5	yes	Primary pit run site. Limited material available.

Further your affiant sayeth naught.


John R. Hoffman

SUBSCRIBED AND SWORN to before me this 31st day of August, 2011.


Notary Public, State of Alaska
My commission expires: 11/1/2013



List of McCarthy Road Right-of-Way Assets

0	rock cut - plow turnaround - multi use
0.2	salmon point - dip net - fishing
0.5	copper river overlook
1	copper river bridge pull out - dip net - fishing
1.5	copper river campground
2.6	kotsina overlook
3.2	truck turnaround
5.1	chitina river scenic overlook
5.2	chitina river scenic overlook
6.9	truck turnaround
8.9	strelina lake camp parking
10	strelina lake public access
10.7	silver lake public access
11.9	sculpin lake public access
14.4	nuget creek - kotsina road
16.9	kuskulana bridge view point
17.1	kuskulana bridge west side
17.3	kuskulana bridge east side - wayside
19.2	truck turnaround
21	truck turnaround
23.5	truck turnaround
24.6	truck turnaround
29	gilahina river - wayside - trestle
29.5	truck turnaround - hunting
33.1	truck turnaround - crystalline pit - hunting
34.5	crystalline hills trailhead
35.3	moose lake - camping
36.4	truck turnaround - red shed
39.4	truck turnaround
43.2	lakina river overlook
44	lakina bridge west
44.1	lakina bridge east
45.2	truck turnaround - winter parking
45.7	long lake - resident parking for across the lake - fishing
47.7	long lake inlet - truck turnaround - camping - fishing
50.4	subdivision parking
51	truck turnaround - roadside pit - rock stacks
53.2	tractor creek - truck turnaround
55	forestry kiosk - wayside
58.4	kennecott river overlook - forestry sign
59.5	national park service kiosk - info - wayside
60.1	kennecott river foot bridge - unloading zone