

## **APPENDIX F: CONSULTATION PARTY INPUT**

As outlined in Section 502 of P.L. 117-328 of the 2023 Consolidated Appropriations Act, the study was conducted in consultation with five entities: “1) the Secretary of Agriculture, acting through the Chief of the Forest Service; 2) the State of Alaska; 3) units of local government in the State of Alaska; 4) Alaska Native Corporations; and 5) representatives of the private sector, including any entity that holds a permit issued by the Federal Energy Regulatory Commission.” These organizations were provided with individual opportunities for in-person and virtual meetings leading up to the publication of the draft study. Not all consultation entities invited responded with interest to attend a meeting. Not all consultation entities provided formal input. The formal letters received from the consultation entities listed in P.L. 117-328 and representatives of the private sector are included in this Appendix.

June 28, 2024

Bureau of Land Management  
Alaska State Office  
Attn: Zach Million (zmillion@blm.gov)  
Carrie Cecil (ccecil@blm.gov)

Delivered Online: <https://eplanning.blm.gov/eplanning-ui/project/2030342/595/8020427/comment>

RE: Alaska Gasline Development Corporation Comments on the Alaska Long Trail National Scenic Trail Feasibility Study, NEPA Number DOI-BLM-AK-0000-2024-0003-CX

Dear BLM Personnel:

Thank you for the opportunity for the Alaska Gasline Development Corporation (AGDC) to provide comments on the Alaska Long Trail National Scenic Trail Feasibility Study, NEPA Number DOI-BLM-AK-0000-2024-0003-CX.

Review of the Long Trail documents available online indicate the trail alternatives overlap and cross two projects managed by AGDC, including the Alaska LNG Project and the Alaska Stand Alone Pipeline (ASAP) project. The projects include natural gas pipelines, material sites, pipe storage yards, camps, compressor and heater stations, access roads, and other work spaces. As an example, we have identified 42 potential overlaps with the Alaska LNG Project, as shown on the enclosed table. There will be similar overlaps with the ASAP Project.

As a state corporation, AGDC supports multiple uses of state land where possible and notes there are provisions in issued permits and land leases to provide for existing trail crossings. However, new and modified trails, especially those which have the potential to cross project infrastructure, will need to be reviewed carefully and managed to ensure minimal conflicts. To allow that review and interaction, AGDC requests formal consultation with BLM on the Long Trail project. With that consultation, we can review and develop opportunities to resolve potential conflicts.

We appreciate BLM's consideration of our comments. Please do not hesitate to contact Lisa Haas, our Environmental, Regulatory, and Lands Manager, via phone at 907-947-9353 or email at [lhaas@agdc.us](mailto:lhaas@agdc.us) with any questions, and to begin the consultation process.

Sincerely,



Frank Richards  
President

cc:

Lisa Haas, AGDC

**Table 1. Alaska Long Trail Segments – Potential Overlap with Alaska LNG Project Facilities**

Alaska Long Trail Segments - Potential Overlap with Alaska LNG Project Facilities					
Zone	Segment ID	Segment Status	Segment Name	Facility Type	Crossing Count
Zone 2: Denali	DEN-2F	Identified gap - conceptual route	Antler Ridge Trail	Operations ROW	1
	DEN-3A	Identified gap - work in progress	Nenana River Multi-use Trail	Access Road	1
			Nenana River Multi-use Trail	Operations ROW	10
			Nenana River Multi-use Trail	Construction ROW	1
	DEN-3B	Identified gap - work in progress	Nenana River Hiking Trail	Additional Temp. Workspace	1
			Nenana River Hiking Trail	Operations ROW	1
	DEN-3C	Existing pathway - candidate	Parks Highway Multi-use Pathway (DNP entrance to Glitter Gulch)	Operations ROW	1
	DEN-3D	Identified gap - work in progress	Glitter Gulch to Healy Separated Path (MP 239-247)	Access Road	1
			Glitter Gulch to Healy Separated Path (MP 239-247)	Access Road	1
			Glitter Gulch to Healy Separated Path (MP 239-247)	Access Road	1
			Glitter Gulch to Healy Separated Path (MP 239-247)	Access Road	1
			Glitter Gulch to Healy Separated Path (MP 239-247)	Operations ROW	1
	DEN-4F	Identified gap - conceptual route	Kobe Ag Road	Access Road	1
	DEN-4J	Identified gap - conceptual route	Totchaket Road to Nenana (Parks Hwy MP 304)	Access Road	1
Totchaket Road to Nenana (Parks Hwy MP 304)			Operations ROW	1	
Zone 3: Mat-Su Valley	MSB-4A	Existing trail - candidate	Susitna Valley Winter Trail	Material Site	1
			Susitna Valley Winter Trail	Material Site	1
			Susitna Valley Winter Trail	Material Site	1
			Susitna Valley Winter Trail	Material Site	1
			Susitna Valley Winter Trail	Camp	1
			Susitna Valley Winter Trail	Compressor Station	1
			Susitna Valley Winter Trail	Main Line Block Valve	1
			Susitna Valley Winter Trail	Operations ROW	11
<b>Grand Total</b>					<b>42</b>

Data Source: AK Long Trail Segments from public Story Map - [https://services5.arcgis.com/gJAeEJVyKiKW6D8d/arcgis/rest/services/AK\\_Long\\_Trail\\_Segments/FeatureServer](https://services5.arcgis.com/gJAeEJVyKiKW6D8d/arcgis/rest/services/AK_Long_Trail_Segments/FeatureServer)  
 Note: Alaska Long Trail Segments for identified gaps referencing the Parks Highway have been excluded from the analysis and counts

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*Our Culture Unites us; Our Land Sustains us; Our People are Prosperous*

May 15, 2024

Steve Cohn, State Director  
United States Department of Interior  
Bureau of Land Management  
Alaska State Office  
222 West 7<sup>th</sup> Avenue, Suite 13  
Anchorage, AK 99513

Via E-mail: [blm\\_ak\\_state\\_director@blm.gov](mailto:blm_ak_state_director@blm.gov)

**RE: Alaska Long Trail Project - Cantwell**

Dear Director Cohn:

This letter is in response to BLM's announcement regarding its intent to commence the proposed Alaska Long National Scenic Trail (Alaska Long NST) Feasibility Study for the public trail system that would run through Cantwell land. As you know, Ahtna Incorporated (Ahtna) was formed under the Alaska Native Claims Settlement Act as the Regional Corporation for the Ahtna Athabascan people of the Copper River Valley and Cantwell area. Ahtna is the largest private landowner in the Cantwell area and has large inholdings in Denali National Park and Preserve.

Ahtna has been combating trespass for decades because our lands are situated along the road system. Trespass is an ongoing threat to our customary and traditional practices of hunting and gathering on the land. We are concerned the Alaska Long Trail Project will exacerbate this problem by opening up Ahtna lands to public use. For this reason, Ahtna respectfully opposes the Alaska Long NST where it crosses Ahtna lands.

If you have any questions, please do not hesitate to contact me at [manderson@ahтна.net](mailto:manderson@ahтна.net).

Sincerely,

AHTNA, INCORPORATED

A handwritten signature in blue ink that reads "Michelle Anderson". The signature is written in a cursive, flowing style.

Michelle Anderson  
President

cc: Kevin Pendergast – Via E-mail: [kpendergast@blm.gov](mailto:kpendergast@blm.gov)  
Deputy State Director, Resources

[www.ahtna.com](http://www.ahtna.com)



October 30, 2024

Steve Cohn, Statewide Director  
BLM Alaska  
222 West 7<sup>th</sup> Avenue, #13  
Anchorage, Alaska 99513

Dear Director Cohen,

The Alaska Department of Fish and Game (ADF&G) received a copy of the Alaska Bureau of Land Management's (BLM's) September 2024, Alaska Long Trail (Long Trail) Newsletter on September 27, 2024. This newsletter included the announcement that BLM will cover the preparation of the feasibility study under a Departmental Categorical Exclusion (CX) found at 43 CFR 46.210(g). ADF&G is formally objecting to this BLM decision based on National Environmental Policy Act (NEPA) requirements for National Scenic Trails, deviation from BLM policies that guide NEPA compliance, and the potential impacts of designating a trail corridor and therefore a new Conservation System Unit (CSU) under ANILCA without environmental review.

### **NEPA compliance**

My staff discussed our objection with Mr. Zach Million of your staff on October 22, 2024. Mr. Million indicated BLM considers the feasibility study itself an action that will have no environmental consequences and thus appropriately exempted from detailed review under the National Environmental Policy Act (NEPA).

We respectfully disagree. By failing to consider various alternatives and their impacts through an EA or EIS, BLM is circumventing its assigned responsibility to inform Congress regarding the feasibility of a trail without providing any information considering various potential impacts of the multiple alignment alternatives. The Feasibility Study is a document whose intent is to inform Congress as to the feasibility of designating the Long Trail. If the trail were to be designated, it would have major impacts on the human environment in Alaska that will not be considered by Congress in designating a trail corridor.

Trail issues identified by your agency involve visitor use conflicts, sanitation, visitor centers, trail ethics, vegetation and soil loss, historic site vandalism [in Alaska disturbance of previously unknown sites is likely a bigger issue], visitor health and safety, law enforcement, travel management, interpretation, and education.<sup>1</sup> Visitor access and visitor use conflicts, sanitation, fragile soils and sensitive wildlife habitats, as well as certain wildlife areas requiring protection, are issues that will make a trail inappropriate in certain areas throughout the State. These issues are best addressed in, at a minimum, an environmental assessment. Visitor health and safety, existing subsistence and recreational use in various areas, the ability to enforce travel

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<sup>1</sup> BLM National Scenic and Historic Trails Strategy and Work Plan, U.S. Department of the Interior, BLM, 2015, page 2.

management actions, impacts to cultural areas, and social and economic impacts are additional topic areas Congress should take into consideration in route selection.

Using a CX is not consistent with BLM's own policies regarding preparation of National Trail Feasibility Studies because of the following extraordinary circumstances. In a situation such as this, completion of either an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) for the Alaska Long Trail is appropriate in conjunction with the Feasibility Study.<sup>2</sup>

- Congressional designation of the Alaska Long Trail as a BLM-managed National Scenic Trail, therefore a component of the National Landscape Conservation System, and a new Conservation System Unit (CSU) in Alaska under the Alaska National Interest Lands Conservation Act will significantly affect the unique characteristics of federal land management in Alaska.
- The proposed feasibility study is proving to be highly controversial because of its potential effects on the quality of existing recreational experiences, subsistence activities, potential access issues, and potential impacts to adjacent property owners and communities along the potential trail corridor.
- A trail across 500 miles of Alaska could contribute to the spread of noxious weeds or non-native invasive species in areas currently free of such species.

### **Potential Impacts to ADF&G authorities must be considered prior to Congressional approval of a corridor**

My department has the primary responsibility for managing Alaska's fish and resident wildlife populations on all lands, including Federal public lands. A National Scenic Trail has the potential to impact not only how we manage the fish and wildlife populations under the sustained yield principal; but also threatens our ability to meet our constitutional mandate to provide sustained hunting, fishing, and trapping opportunities for the people of the State by limiting off-road vehicle use, requiring setbacks from the trail corridor for discharge of a firearm or trap sets, and other unanticipated impacts to hunters, anglers, and trappers.

In addition to fish and wildlife management, we hold responsibility for reviewing and approving all "proposed construction, work or use" within anadromous waterbodies (AS 16.05.871) as well as to ensure that any obstruction built across or in a stream frequented by fish shall be provided with a durable and efficient fishway that "shall be kept open, unobstructed, and supplied with a sufficient quantity of water to admit freely the passage of fish through it (AS 16.05.841). The proposed trail will certainly cross numerous waterbodies, consideration of the effects to various waterbodies must be considered prior to determining if the trail will be feasible. The potential impacts this proposed trail will have on our management responsibilities must be considered in any submittal to Congress. The appropriate process to consider these impacts is through a more robust NEPA process than a CX.

Engagement with state agencies in the development of the Feasibility Study is necessary to consider access along the trail and how the trail will directly affect uses of adjacent state lands, may limit access to state navigable waterbodies and state-owned shorelands, and how it may limit uses on state-owned navigable waters and RS 2477 highways. Mr. Million indicated that the State will have an opportunity to review the Draft Feasibility Study prior to its release for public review, but it was unclear that sufficient time will be provided for the State to influence

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<sup>2</sup> See Department of the Interior (DOI) Department Manual (DM) 516 DM 2, Appendix 2

the Draft Feasibility Study before it is released to the public. We were told tight timelines exist as the Feasibility Study must be submitted to Congress in the Fall of 2025.

### **Deviation from BLM policies**

BLM's policies direct that proposals for National Scenic Trails normally require an EA or EIS.<sup>3,4</sup> Reviewing the environmental impacts under an EA or EIS will align with the direction in Public Law 117-328—DEC. 29, 2022, to study the feasibility of designating the trail, “including evaluating the potential impacts of the trail on rights-of-way, existing rights, or other recreational uses of the land proposed to be used for the trail”. Congress did not limit the study to rights-of-way, existing rights, and recreational uses of the land, it emphasized including those in the study.

### **ANILCA and new CSU**

ANILCA includes National Trails designated by Congress in its definition of CSUs. The trail will be subject to all the statutory provisions in ANILCA that apply to CSUs, most relevant to the study processes are the access provisions that apply to subsistence users and the general public in Titles VIII and XI. Both ANILCA sections 811 and 1110(a) direct the Secretary to allow motorized and non-motorized methods of access in all CSUs (e.g., WSRs) subject to “reasonable regulation.” The BLM must conduct an 810 analysis of this trail before Congress takes action to designate a CSU.

We request the BLM reconsider the decision to use a CX for the Alaska Long Trail Feasibility Study and initiate an EA or EIS in conjunction with the Feasibility Study. We also request the Feasibility Study provide an analysis of the statutes and regulations that will apply to the trail, if designated. We are concerned designation could result in layers of overlapping restrictions applied to land both inside and outside of the designated trail corridor. Without a summary of applicable regulations the BLM would apply in its management of the trail, Congress will be unable to consider the full implications this designation could cause on Alaskan's use of these public lands. As an example, OHV travel restrictions, implemented under BLM nationwide regulations, could inappropriately limit the public's ability to access both BLM's lands as well as adjacent state and private lands for hunting and fishing.

If you have any questions or would like to discuss, please contact Brad Dunker at 907-267-2119 or [Bradley.dunker@alaska.gov](mailto:Bradley.dunker@alaska.gov).

Respectfully,



Doug Vincent-Lang  
Commissioner, Alaska Department of Fish and Game

Cc:

The Honorable Lisa Murkowski, United States Senate  
The Honorable Dan Sullivan, United States Senate  
The Honorable Mary Peltola, United States House of Representatives  
John Boyle, Commissioner, Alaska Department of Natural Resources  
Ryan Anderson, Commissioner, Alaska Department of Transportation

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<sup>3</sup> DOI 516 DM 11, Chapter 11, Managing the NEPA Process – [BLM], 11.8 Major Actions Requiring an [Environmental Impact Statement] EIS, B.(2).

<sup>4</sup> BLM Manual 6250 National Scenic and Historic Trail Administration. B. National Trail Feasibility Study

## Talkeetna Loop Long Trail Comments

### Alaska Long Trail National Scenic Trail Feasibility Study Comments Specific Focus: Talkeetna Loop Conceptual Route, Zone 3 Matanuska Susitna Valley

6/11/24

This feasibility study process has a Categorical Exclusion under NEPA. Thus, there is no EA or EIS requirement. These comments are what I would call “scoping comments” under NEPA. I hope that I am understanding correctly the following. If Congress accepts your feasibility study and wants to proceed with the designation, an EIS under NEPA should be required.

This loop should NOT be included in the Alaska Long Trail National Scenic Trail designation. The loop trail on various maps in the BLM e-planning and AlaskaTrails.org is only conceptual. The route is an identified gap and is not representative of an actual alignment according to BLM. Thus, public comment now in this designated comment period does not conform with (b)(1) of the National Trails System Act which is to state the actual proposed route.

According to Sam Dinges, Mat Su Coordinator of Alaska Trails the exact route selection will happen in the fall of 2024. So we cannot really comment on the actual Talkeetna Loop trail route because it does not actually exist at this time. We can only make generalized comments of the area that the conceptual line passes through. Thus, we also cannot fulfill (b)(2).

This conceptual trail passes through the management land boundaries of the state and borough: Hatcher Pass Management Area, the Susitna Matanuska Area Plan, the Southeast Susitna Area Plan, the Susitna Basin Recreation River Management Plan and the Mat Su Borough Talkeetna Comprehensive Plan. The route will impact the Nelchina Public Use Area.

The habitat of these state and borough public lands are priceless. The general area of the loop is one of the most heavily used big game hunting areas in the state.

#### 1. Susitna-Matanuska Area Plan (SMAP) of the State of Alaska

The Susitna-Matanuska Area Plan was adopted August 2011 by the Division of Mining, Land and Water, Alaska Department of Natural Resources.

Talkeetna Mountains Region

**Members of the public believe that winter trails and winter travel in the Talkeetna Mountains is NOT feasible.**

Subunit T-01 of this region has designations/classification of Habitat/Wildlife Habitat Land and Water Resources/Water Resources Land. Subunit T-02 is designated Habitat and Recreation Public Dispersed/Public Recreation Land. Subunit L-03 is the state Legislatively Designated area Nelchina Public Use Area.

“Most of the region’s resources are related to its wildlife and its associated habitat. Significant moose calving, and winter concentration areas occur within the Talkeetna foothills, while Dall sheep are present throughout much of the remainder of the unit and especially those areas that are exposed and provide escape terrain from predators. Both winter and summer caribou concentration areas occur near and east of the Talkeetna River. The prime caribou calving areas occur, however, further to the east within the Nelchina Public Use Area. All of the principal streams are anadromous.

With the presence of significant game populations and adjacent populated areas, this is one of the most heavily used big game hunting areas in the state, offering moose, Dall sheep, bear, and caribou.” (pg. 3-114)



“Most state land will be managed in a manner similar to that inferred from its designation, which means that most will be managed for its wildlife habitat, water resource, and public recreation values.” (pg. 3-115)

Subunit T-01 includes 6 principal streams within the Talkeetna Mtn. region: Kashwitna River, Sheep Creek, Sheep River, Montana Creek, Iron Creek and the upper Talkeetna River from the end of the Recreation River designation. All of these waterways are anadromous. The riverine areas are dense spruce-poplar forest.

Subunit T-02 includes Mineral Licks in T 026N 001 E Sec 25,28,35 and T 025N 001 E Sec 1,2,4. Special considerations for mineral lick protections and to protect uses within the Nelchina Public Use Area and the Hatcher Pass Management Area. Mitigation stipulations for these important habitat resources.

These 2 subunits are mostly mountainous except for the 7 prominent river valleys. Important wildlife travel corridors in these regions. Significant moose calving and winter concentration areas occur within the Talkeetna Foothills. Dall sheep are present throughout much of the unit especially in those areas that are exposed and provide escape terrain from predators. Both winter and summer caribou concentrations areas exist near the Talkeetna River and east.

#### South Parks Highway Region of SMAP

The western area of the region has experienced considerable growth over the last 25 years, consisting first of recreational cabins but more recently of residential homes that are used throughout the year. Some commercial development has occurred along the principal road within this region-the Talkeetna Spur Road- with concentration occurring in its last half mile before the intersection with the Parks Highway. Several local management plans affect this region. (p. 3-25)

A number of state land disposals have happened in this Region. The past disposals of public land which has become private land which would be impacted by this Loop conceptual trail are:

- Open to Entry Lands,
- Talkeetna Bluffs and Talkeetna Bluffs Addition which abuts south of the Talkeetna Recreation River and its corridor,
- Bald Mountain Remote,
- Bald Mountain and Bald Mountain South Subdivisions, and
- Bartlett Hills Subdivision.

Much of the land east of the Parks Highway from Wasilla to Talkeetna including land along the river corridors is at least partially in private ownership.

Subunits S-17 and S-24 of the South Parks Highway Region is the area south of the Talkeetna River including the Sheep River Corridor and several large lakes. Numerous remote lots are scattered over 29,061 acres. This is a belt of remote settlement lands of approximately 386 parcels created by state land disposals the last fifty years or so. The moose and caribou fall and winter habitat is prime. Important moose calving and winter concentration areas occur. Anadromous streams abound. This is important habitat that has much open undeveloped space. These subunits are also part of a wildlife migration corridor from the high country of the Talkeetna Mountain foothills to the riverine country of the Talkeetna River. Residents, such as myself, have witnessed such.

These subunits provide a buffer between the human development and land uses to the west towards and including Talkeetna and the Talkeetna Mountains to the east. The Plan's management intent is to avoid negative impacts to the habitat.

## Talkeetna Loop Long Trail Comments

There are big chunks of native private land, Mat Su Borough public land private land to the east of Talkeetna and the Spur Road.

Subunit S-35, 12,781 acres, is designated Forestry. This subunit along with the Kashwitna Uplands Region unit U-01 of the Southeast Susitna Area Plan has been classified forestry for over 25 years. These lands are a significant portion of the Division of Forestry sustained yield inventory within the eastern part of the Susitna Valley.

### 2. SUSITNA BASIN RECREATION RIVERS MANAGEMENT PLAN: FOCUS TALKEETNA RECREATION RIVER MANAGEMENT UNIT

The conceptual route could impact the management plan area. **The general conceptual map line is just south of the Talkeetna River which would put it in the Recreation River Corridor area.**

The Susitna Basin Recreation Rivers Management Plan was adopted August 1991 and is currently under a Revision process. This important state management plan personifies the important resources of this general area that the public wants to protect. It is also an Alaska Department of Natural Resources managed plan. 44.5 miles of the Talkeetna River, including the upper Talkeetna River Canyon, is a state legislatively designated Recreation River. The river and its recreation river corridors are managed for high public use values. Riparian management areas are within the corridors. These are public ownership and use, recreation, fish and wildlife habitat, water quality and water flow.

The Final Update of the plan is expected out to the public soon. The public scoping comments focused on protection of the natural resources.

- Maintaining or expanding protections for fish and wildlife habitat within the corridors,
- Habitat degradation especially to spawning areas, from motorized use,
- Increased rates of bank erosion in the corridors, water quality and riparian area degradation.
- The effects on fish and wildlife species due to climate change warming waterbodies and decreasing stream flows. Support to maintain instream flow reservations to preserve the quantity of water that supports fish and wildlife populations.

### 3. The Nelchina Public Use Area (NPUA) and the Nelchina Caribou Herd

The Nelchina Public Use Area has no management plan but is overseen by the Alaska Department of Natural Resources. This is habitat for the herd and contains migratory routes.

Due to the many vagaries of the changing climate conditions, wintering adult and calf mortality have been high the past three years. This has led to a severe population decline and low recruitment rate. The fall of 2022 population estimate was 17,433.

ADFG's statistics show the latest herd population estimate is 8,823. Thus, there is no harvestable surplus. ADFG emergency order on 6/30/2023 has closed GMU 13 hunts including both tier 1 and community subsistence hunts. This means no state hunts in one of the most popular residential hunting areas in the state. The herd might need 15 years to recover. The range forage needs the time to recover. If the D-1 protections in the herd range are eliminated that would remove the federal subsistence priority affecting the subsistence resource This is the bigger picture.

A recent study by the U.S. Geological Survey regarding caribou herds on the North Slope can be applied to the Nelchina Herd if human trail access and ancillary development occurs in their range. The new study has shown that caribou are very sensitive to human activity more than we previously recognized. The study adds to the growing body of evidence that caribou are much more bothered

by infrastructure and industrial activity. Such development has a “barrier effect” which causes longer migratory delays. Potential effects range from an individual animal’s body condition, reproductive success, and total population size. Calves are smaller affecting their survival rate.

4. The Talkeetna Comprehensive Plan (TCP)

Generally, the planning area is bounded on the north by the Talkeetna River, on the west by the Susitna River, on the east by a line between Range 1 East and Range 2 East, Seward Meridian, townships 24-29 North and on the south by a line extending east from Fish Lake to T 24N R2E, S.M. (page iv TCP) The Plan was adopted by the Mat Su Borough Assembly January 1998. An Advisory Committee of citizens was formed by the borough’s planning commission to write the plan along with the help of the Borough Planning Department. The Land Use and Community Development Goals are:

- Maintain the community’s small-town atmosphere, sense of community and high quality of life.
- Protect and preserve the wilderness values and natural resources of the lands surrounding Talkeetna.
- Guide development in a manner which enhances Talkeetna’s natural appeal, taking steps to ensure that future growth and change will build a desirable human environment.
- Maintain Talkeetna’s major recreation and ecologically sound tourism economy and avoid conflicting activities. (p. vii)

5. The Southeast Susitna Area Plan encompasses lands conceptualized on the loop map.

This Plan was adopted in April 2008 by the Resource Assessment and Development Section of the Division of Mining, Land and Water, Alaska Department of Natural Resources. To the west is the Kashwitna -Willow Uplands and to the east is the Hatcher Pass Management Plan for state land.

Since the adoption of the previous plan much has changed in the Susitna Valley. Much of the area along the Parks Highway has been extensively developed from the intersection of the Talkeetna Spur Road and Parks Highway to the Knik Arm of Cook Inlet in the South, the Susitna River to the west and the Matanuska River to the east. A number of Legislatively Designated Areas occur: Willow Creek and Nancy Lake State Recreation Areas, Palmer Hay Flats, Goose Bay and Susitna Flats State Game Refuges, the Little Susitna State Recreation River, and the Fish Creek Management Plan of the borough and state. The units are a mix of vegetated uplands and shrub type palustrine wetlands. Most state land designation provides for habitat protection and winter recreation. To the east and north, it is fairly mountainous. A portion is heavily forested and is an important part of the forest inventory base. Moose are generally present with a number of areas of winter concentration, rutting and calving areas. Waterfowl and shorebird concentrations and nesting occur seasonally. A number of designated anadromous creeks and rivers occur and are listed in the Anadromous Water Catalog: Willow, Little Willow and Montana Creeks and the Little Susitna River. Habitat and Water Resources designations occur on each side of the streams.

6. Specific scoping type questions that need to be answered in the draft feasibility study

- It also appears that the route is on the current motorized Talkeetna Bluffs Subdivision Trail. This motorized trail is used by approximately 200 to 300 remote property owners to access their properties. These are the 2 Talkeetna Bluffs Subdivisions, the Bald Mountain Remote Parcels, and private parcels across the Talkeetna River and upriver. If it becomes a National Scenic Trail, how will our private properties be protected from crime etc. from outsiders coming in and trespassing? Or will the route be a totally new trail further fragmenting fish and wildlife habitat? What will be the cumulative impacts from a second new trail along with the current motorized trail? What will prevent the motorized not coming onto the non-motorized trail?

## Talkeetna Loop Long Trail Comments

The general route along the west side of the loop appears to parallel the Talkeetna Spur Road. There are 100s of private properties along the Talkeetna Spur Road. How will the national trail avoid the properties and driveways?

- Those portions of the Talkeetna Mountains are roadless and far from any law enforcement, fire protection and emergency medical personnel. Wildlife is getting pushed farther out into the Talkeetna Mountain area by human development in the Talkeetna town and Spur Road areas. Thus, the remote areas of the Talkeetna Mts, where this trail is proposed, has become critical habitat for moose, caribou, and all other mammals and birds that thrive in remote areas. The trail would fragment the habitat. Human intervention would be introduced and be constant. The trail would be a vertical road requiring mechanical means to build and maintain it.
- The future of trail building and trail maintenance in the Long Trail is especially appropriate for the Talkeetna/Hatcher Pass loops. Typically, trails have a lifespan of 10-20 years before needing major maintenance. But now with climate change impacts, maintenance has to be done that is not technically planned for.

A lot of trails in the Southcentral area are created from old mining trails. Do not make the mistake of using them without in-depth analysis for the future. These mining trails were built to get to resources as fast as possible. They were not built for longevity or climate resilience. A lot of them are not in good spots. They go up narrow canyons along creeks and are vulnerable to landslides and erosion.

Building trails with climate resilience in mind might mean putting in larger bridges to handle larger floods. Lay down gravel to weigh down the soil and stop water from pooling up. Or rerouting to make a trail less vulnerable to erosion.

- Search and rescue costs must be considered upfront. We have 14 trooper openings here in the Mat Su. Who will pay for such? The community is currently maxed out now to provide those services.
- The Mat Su Borough Assembly has recently passed Resolution 24-056 to support the Long Trail. Not the designation but the trail itself. Their resolution specifically state that the borough can use that access for extractive industries like mining and logging on public land. So, the Long Trail loop could be opening up a whole area to resource extraction.
- The Long Trail is a big bulldozer trail through the undeveloped woods with ancillary development and infrastructure.

The value of intact boreal forest and natural undeveloped lands is imperative in this time of climate change. Shifting weather patterns impact fish, wildlife, plant ranges and habitat. Intact natural lands that are NOT fragmented by roads, human development and infrastructure that clears land, is more resilient to climactic changes. Natural forests and lands that are diverse complex systems form their own sheltering and buffering microclimates. This slows the rate of change and allow resident species time to adapt to climate changes. Resilient ecosystems can regenerate better after disturbances, and resist and recover from pests, diseases, temperature changes and water availability.

Becky Long for Alaska Survival,  
On behalf of the Board of Directors

cc: Judy Price, President Board of Directors  
alaskasurvival101@gmail.com

*Rebecca Long*



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**[EXTERNAL] Alaska Long Trail**

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**From** Rick Van Nieuwenhuyse <rickvann@contangoore.com>

**Date** Fri 6/28/2024 4:15 PM

**To** Million, Zach <zmillion@blm.gov>; Cecil, Carrie H <ccecil@blm.gov>

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To: Mr. Zach Million and Ms. Carrie Cecil;

I am very interested to learn more about what the BLM has planned for the Alaska Long Trail (ALT) route. I have been following this effort for the past several years, but didn't hear much more once the BLM took on this project in 2022-2023. I am an avid hiker and enjoy the outdoors like many Alaskans. I am also a geologist and CEO of an Alaska based mining and exploration company located in Fairbanks, Alaska. We own mineral rights throughout the State and so are naturally concerned about access to and use of lands that would be impacted by this proposed trail system. As I am sure you can appreciate, most of the lands the BLM is evaluating under the feasibility study are not BLM lands; they are State of Alaska lands and private lands – including Native corporation lands as well as lands that are traditional used by many, many tribes and Alaskans in general. This fact raises many, many questions about the Feasibility Study currently being undertaken by the BLM. In general nearly all of the “trails” you refer to on the your maps were established to support mining operations. With regards to State of Alaska lands – many of the “trails” are now roads (including some that are highways) and most if not all of the rest of the trails are RS2477 designations – which grants the State of Alaska and its residents right-of-way access. How will the proposed ALT effect these rights? Furthermore, with regards to the State of Alaska lands, many of these have active mining claims currently being explored. There are also some large and many small active mines on these State owned lands as well. How will the proposed ALT impact these existing mineral rights? The reason I bring these points up is that there is scarce to absolutely no mention of any of this in any of your promotional materials. Furthermore, you mention stakeholder engagement and yet we are an owner of patented land along several of your proposed routes and have never been contacted. I know many other people and groups that own land and or have mineral rights along and adjacent to these routes and they have not been contacted either. Your current effort of outreach and public engagement has only been with like minded people who want a trail system – certainly not representative of people who live and earn a living here in Alaska.

My specific areas of direct concern are around Hatcher Pass and our Lucky Shot mine (active) and in the Fairbanks area where we also own active mining claims. When I read statements that are in your public meeting materials such as the definition of a National Scenic Trail (which I understand is the designation you are evaluating) you wrote: *“Continuous, extended routes of outdoor recreation within protected corridors”*. What gives BLM the right to establish “protective corridors” on anything but perhaps BLM owned lands? Who establishes the criteria for what defines a “protective corridor”?

Your Phase 1 period lasted from October 2023 to June 2024 for “Stakeholder Engagement” and yet I am just learning about this yesterday at a Fairbanks Chamber of Commerce meeting – the day before public comments are due! Obviously, you have gamed the system. I am not against the ALT, but the BLM’s public outreach has been sorely lacking when you make no effort to engage with patented land owners and mineral rights owners clearly along the route. Nor have made any effort to include resource extraction industry advocacy groups. On one of your slides titled “Collaboration” you mention consultation with “Representatives of the private sector” – again, this is not accurate. There has been NO concerted effort to include industry groups like AMA, RDC and Alaska Metal Mines, nor as I said previously to include active miners along this extensive trail route. In addition, there is no mention of existing Land Management Plans and taking those into consideration. You mention that new management plans will have to be designed once the ALT route has been determined! Why are you not using existing Management Plans? By what authority do you ignore existing land management plans!? Furthermore, the definition of what a “Feasibility Study” is and is not are incredibly uninformative. Certainly nothing of the caliber that we must undertake in the private sector to obtain authorization to construct and operate a mine.

In your description of “What is the purpose of a Feasibility Study – The Study Evaluates the following:”

1. “The areas adjacent to such trails, to be utilized for scenic, historic, natural, cultural, or developmental purposes.” – there is no criteria describe or how the criteria will be used;
2. “The characteristics which, in the judgement of the appropriate Secretary, make the proposed trail worthy of designation as a national scenic or national historic trail.” – Who is the “appropriate Secretary” on lands that the BLM has absolutely no authority to make such determinations – not the Secretaries of DOI nor DOA!; and again, what are the criteria being used and who established them?”
3. “The current status of land ownership, as well as the current and potential use along the designated route.” What authority does BLM, DOI or the DOA have here on lands it does not own or manage; Certainly if the State is involved and co-funding this study, then the State should have ultimate say and control on those lands at the very least. I suppose the next point is an honorable mention of the State of Alaska’s role in this process!
4. “The extent to which a State or its political subdivision and public and private organizations might reasonably be expected to participate in acquiring the necessary lands and in the administration thereof.” The term “might reasonably be expected to participate” sounds a bit ominous. Again, the BLM has zero authority on State of Alaska lands or on private lands; nor can the BLM trample peoples existing rights – even with Congressional approval!
5. “The Relative uses of the lands involved, including: the number of anticipated visitor-days for the entire length of, as well as for segments of, such trail; the number of months which such trail, or segments thereof, will be open for recreation purposes; economic and social benefits which might accrue from alternate land uses; and the estimated [human]-years of civilian employment and expenditures expected for the purposes of maintenance, supervision, and regulation of such trail.” This entire piece assumes that there is a trail. What about all the private property rights, mineral rights and access rights that already exist? They are not mentioned in any of the documentation!

I, like many Alaskans enjoy the outdoors. However, this Feasibility is ill-conceived and not well thought through, and is **not** the result of bona fide public engagement. It has one purpose in mind – to get a determination to build a trail while completely ignoring the rights of existing property and mineral rights owners as well as all those who have traditional access over these same areas. The very fact that you have made no attempt to include us and the rest of the mining sector in your planning stages demonstrates this point.

Thoughtfully,

Rick Van Nieuwenhuyse  
 President & CEO  
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# ALASKA LONG TRAIL FEASIBILITY STUDY

## COMMENT FORM



We encourage you to provide comments by filling out and submitting this form during one of the in-person public engagement sessions. Please use additional pages if needed. Please note route specific comments on physical maps, or via the GIS mapping tool.

*Before including your address, phone number, e-mail address, or other personal identifying information in your comment, please be advised that your entire comment--including your personal identifying information--may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.*

Visit the BLM's project website for more information, updates:



### Contact Information (Please Print)

Name: Frank Schultz Affiliation: \_\_\_\_\_  
Address: PO BOX 91765  
City: Fairbanks State: AK Zip: 99708  
E-mail address: AKSUFFER77@Yahoo.com

**Do you think the proposed route is nationally significant? Why or why not?**

I think if it was designated as a national scenic trail it would, I also think as far as "long trails" go it would probably be far down on most through hikes list. Most long trails seem to be more in and out of towns where people can resupply often. This trail has many sections where someone would be days without any area to get supplies.



How do you currently use the area along the proposed corridor? How does this change by the season?

I have a cabin that I use by sled in winter and by boat in summer. Spring and fall the area is hunted and in summer we work on the cabin and trails. winter trapping

How might the designation of the AK Long Trail NST affect your area/community?

It would not directly affect the actual cabin but would affect the trails I use ~~to~~ hunt, fish, trap.

Are there alternative segments that should be included? Why?

Are there segments that you think should NOT be included? Why?

I think the area north of the Alaska Range that detours out to done lake is almost all bog/swamp and is one of the only areas of the trail that seem to make a major detour. The area also has seen problems in the past with tourists when the into the wild bus was still on the other side of the TEK many people drown, enough for the state to move the BUS.



## MATANUSKA-SUSITNA BOROUGH COMMUNITY DEVELOPMENT DEPARTMENT

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### MEMO

**Date:** September 6, 2024

**To:** Zach Million, BLM Alaska Region

**From:** Jillian Morrissey, Director

**RE:** Alaska Long Trail, National Scenic Trail Feasibility Study

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Thank you for the opportunity to provide comments on the National Scenic Trail Feasibility Study for the Alaska Long Trail. The Matanuska-Susitna Borough is in support of the continued development of the AK Long Trail and the Assembly included it in their FY24 Legislative Priorities and in an unanimously approved legislation. Additionally, I wanted to make note of the entirety of the legislation that the Assembly passed this spring. Resolution 24-056 title is “opposing releasing land authority along the proposed Alaska Long Trail as it pertains to the National Scenic Trail feasibility study” and I have attached the legislation to this memo for your review.

The Assembly has directed the Manager to continue efforts with partners and agencies to plan and support development of this project with the following caveats:

- The Borough will maintain land authority and management where applicable
- The Borough retains the right to exercise existing and future Borough management plans and economic development opportunities
- The Borough asserts jurisdiction of management of all Borough trails and uses and will not support any trail losing traditional use. For example, any Borough trail that is currently or traditionally utilized as a motorized trail will be maintained and managed as motorized access and/or use.

As the planning and development process continues, it is important to note that the Mat-Su Borough is not the primary landowner for the majority of the proposed alignments through the Borough boundaries. Therefore, our comments on proposed alignments are that we support enhanced multi-use connectivity throughout the Borough and public access for residents and visitors, alike. Additionally, the use of existing alignments and facilities like the Pioneer Peak trail and Government Peak Recreation Area are fiscally responsible decisions and allow more efficient allocation and distribution of resources into the future.

Sponsored by: Assemblymember Yundt  
Amended: 05/21/24  
Adopted: 05/21/24

**MATANUSKA-SUSITNA BOROUGH  
RESOLUTION SERIAL NO. 24-056**

A RESOLUTION OF THE MATANUSKA-SUSITNA BOROUGH ASSEMBLY TO OPPOSE  
RELEASING LAND AUTHORITY ALONG THE PROPOSED ALASKA LONG TRAIL AS  
IT PERTAINS TO THE NATIONAL SCENIC TRAIL FEASIBILITY STUDY.

WHEREAS, the proposed Alaska Long Trail would run from Seward to Fairbanks; and

WHEREAS, approximately 100 of the 500 miles of the Alaska Long Trail would run through the Borough; and

WHEREAS, there are a number of proposed routes for the trail through the Borough and some are existing trails and some are proposed new trails; and

WHEREAS, the proposed Alaska Long Trail alignments within the Borough utilize some existing trails that are on Borough land and non-Borough lands where the Borough has partnerships and agreements; and

WHEREAS, Congress has approved the Alaska Long National Scenic Trail Feasibility Study to evaluate the trail's eligibility and inclusion as a National Scenic Trail; and

WHEREAS, the Bureau of Land Management is the federal agency authorized to conduct the Alaska Long Trail Feasibility Study has begun to solicit input from the public on the feasibility,

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suitability, and desirability of the Alaska Long National Scenic Trail and will forward the information to Congress; and

WHEREAS, the Bureau of Land Management has not entered discussion with the Borough on right-of-way easements and necessary cooperative agreements; and

WHEREAS, the Borough is committed to retaining land authority and management of Borough lands; and retain the right to exercise existing and future Borough management plans and economic development opportunities; and

WHEREAS, the Borough asserts jurisdiction of management of all Borough trails and uses including visitor access, visitor use, visitor modalities, land management and development along the corridor and at existing and future corridor crossings; and

NOW, THEREFORE, BE IT RESOLVED, the Assembly is opposed to relinquishing authority over Borough-Owned and/or operated trails and lands and opposed to over-reaching restrictions on the Alaska Long Trail within the boundaries of the Borough.

NOW, THEREFORE, BE IT RESOLVED, the Assembly reaffirms its commitment to the Alaska Long Trail for the reasons expressed in Resolution Serial No. 21-045.

ADOPTED by the Matanuska-Susitna Borough Assembly this 21 day of May, 2024.

  
EDNA DeVRIES, Borough Mayor

ATTEST:

  
LONNIE R. McKECHNIE, CMC, Borough Clerk  
(SEAL)

PASSED UNANIMOUSLY: Hale, Nowers, McKee, Yundt, Gamble, Fonov, and Bernier

Sponsored by: Assemblymembers Yundt and Gamble  
Postponed to 10/01/24: 09/10/24  
Amended: 10/01/24  
Adopted: 10/01/24

**MATANUSKA-SUSITNA BOROUGH  
RESOLUTION SERIAL NO. 24-099**

A RESOLUTION OF THE MATANUSKA-SUSITNA BOROUGH ASSEMBLY OPPOSING  
THE RELEASE OF LAND AUTHORITY ALONG THE PROPOSED ALASKA LONG TRAIL  
AS IT PERTAINS TO THE NATIONAL SCENIC TRAIL FEASIBILITY STUDY.

WHEREAS, the proposed Alaska Long Trail would run from  
Seward to Fairbanks; and

WHEREAS, approximately 100 of the 500 miles of the Alaska  
Long Trail would run through the Borough; and

WHEREAS, there are a number of proposed routes for the trail  
through the Borough and some are existing trails, and some are  
proposed new trails; and

WHEREAS, the proposed Alaska Long Trail alignments within the  
Borough utilize some existing trails that are on Borough land and  
non-Borough lands where the Borough has partnerships and  
agreements; and

WHEREAS, Congress has approved the Alaska Long National  
Scenic Trail Feasibility Study to evaluate the trails eligibility  
and inclusion as a National Scenic Trail; and

WHEREAS, the Bureau of Land Management is the federal agency  
authorized to conduct the Alaska Long Trail Feasibility Study has

begun to solicit input from the public on the feasibility, suitability, and desirability of the Alaska Long National Scenic Trail and will forward the information to Congress; and

WHEREAS, the Bureau of Land Management has not entered discussion with the Borough on right-of-way easements and necessary cooperative agreements; and

WHEREAS, the Borough is committed to retaining land authority and management of Borough lands; and retain the right to exercise existing and future Borough management plans and economic development opportunities; and

WHEREAS, the Borough asserts jurisdiction of management of all Borough trails and uses including visitor access, visitor use, visitor modalities, land management and development along the corridor and existing and future corridor crossing.

NOW, THEREFORE, BE IT RESOLVED, that the Assembly is opposed to relinquishing authority over Borough-owned and/or operated trails and lands and opposed to over-reaching restrictions on the Alaska Long Trail within the boundaries of the Borough.

BE IT FURTHER RESOLVED, that the Assembly specifically opposes the designation of the Alaska Long Trail as a National Scenic Trail on Borough-Owned land because of the use restrictions and loss of local control over the trail.

BE IT FURTHER RESOLVED, that the Assembly reaffirms its commitment to the Alaska Long Trail for the reasons expressed in Resolution Serial No. 21-045.

ADOPTED by the Matanuska-Susitna Borough Assembly this 1 day of October, 2024.

  
EDNA DeVRIES, Borough Mayor

ATTEST:

  
LONNIE R. McKECHNIE, CMC, Borough Clerk

(SEAL)



PASSED UNANIMOUSLY: Hale, Nowers, McKee, Gamble, Fonov, and Bernier