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April 14, 2025

Bureau of Land Management  
Alaska State Office  
222 West 7th Avenue, #13  
Anchorage, AK 99513-7504  
*Submitted electronically at BLM National NEPA Register website*

Subject: Comments on the Alaska Long National Scenic Trail Feasibility Study

Dear Sir/Madam,

The Alaska Miners Association (AMA) writes to comment on the Bureau of Land Management's recently released *Alaska Long National Scenic Trail Feasibility Study*. We appreciate the opportunity to share our thoughts on the feasibility study and the Alaska Long Trail.

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,400 members that come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Our members include individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

### **Mining and tourism can both be important industries for Alaska**

Mining and tourism are both important resource industries for Alaska. They both provide important employment for Alaskans, and both support Alaska communities. Given recent declines and various challenges in other natural resource industries, they have the most significant potential for expansion among resource-based industries. We believe mining and tourism can be compatible—though not on every acre. The two industries can coexist and complement each other in ways that benefit Alaskans and visitors alike.

### **Key Comments and Recommendations on the Feasibility Study**

Upon reviewing the feasibility study, we have several points of concern and recommendations for clarification:

1. **Clarify the Limitations of Federal Control.** The feasibility study must clearly state that a National Scenic Trail (NST) does not grant federal agency control or influence over non-federal land, including state, municipal, Native Corporation, or other private landowners. The federal

government cannot dictate how non-federal landowners manage their land, including deciding trail location, restrictions on motorized use, or land management buffers around the trail.

There are several sentences that imply this limitation, but they are scattered throughout the document and potentially contradicted in other locations. The limitations on federal authority must be explicitly stated. Ideally, this would be a separate section at the beginning of the study, so the limits of federal authority are clear to all stakeholders, including state and local governments, recreation users, and private landowners.

2. **Incorporating a Clear Statement in Any Federal Statute Designating the Trail.** This clarification about federal limitations should not only be present in the feasibility study but must also be included in legislation that designates an Alaska Long National Scenic Trail. Ensuring the federal government cannot dictate land use or force landowners to adopt federal restrictions will provide much-needed certainty for all landholders and users along the trail's eventual route. Making this clear is critical for a fact-based assessment of the trail's impacts and benefits. The statute should require that any land or easements can only be acquired from willing sellers or donors.
3. **Showcasing Alaska's Diverse Values Along the Trail.** The study should also recognize that different sections of the trail can and should showcase the wide range of valuable uses of Alaska land. While some areas should highlight Alaska's scenic beauty and wilderness, other sections, such as those through Hatcher Pass, should also highlight the state's rich history, including the significant role of mining in shaping Alaska's economy and heritage. In these sections, the trail could help visitors understand and appreciate the historical and current uses of the land, including ongoing mining operations, timber harvests, remote cabins, and other uses. Where necessary, trail rerouting may be required for safety reasons near active mining sites, but such rerouting should also ensure that hikers are able to respect, experience and understand these uses in a meaningful way.
4. **Trail Development and Maintenance Compatibility with Other Uses.** Finally, we recommend that the feasibility study explicitly state that federal funds allocated for trail development and maintenance should also be able to support activities that make the trail compatible with other land uses in the area. For example, these funds could be used for improving roads and trailheads, rerouting trails where there may be conflicts with resource development activities, installing visual buffers, creating overlooks, or placing educational signage that explains the various uses of the land along the trail. Such measures would help ensure the trail coexists harmoniously with other local industries, including mining, while enhancing the visitor experience.

In conclusion, we support efforts to expand tourism and recreational opportunities in Alaska, but we strongly believe that the long-term success of the Alaska Long National Scenic Trail depends on how it supports and showcases land uses and industries along the route. We understand Long Trail advocates recognize that an Alaska Long Trail needs to be different than "lower 48" National Scenic Trails, ensuring that trail users gain both from the experience of our state's unique wild places and



also Alaska's historic, existing and future land uses such as mining. With these issues addressed, we believe the Long Trail can become a valuable asset for Alaska.

Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Deantha Skibinski".

Deantha Skibinski  
Executive Director

Cc: Mariyam Medovaya, Alaska Trails