



RE: Opposition to Proposed Conveyance of Approximately 19,950 Acres to AIDEA – ADL 234762

To the Alaska Department of Natural Resources:

The Alaska Outdoor Council (AOC) respectfully submits these comments in opposition to the proposed conveyance of approximately 19,950 acres of State land to the Alaska Industrial Development and Export Authority (AIDEA) under AS 38.05.810(a).

Founded in 1955, AOC represents approximately 4,000 members and affiliated clubs throughout Alaska, including hunters, trappers, anglers, and outdoor enthusiasts who depend upon access to State and federal public lands. For more than 70 years, AOC has participated in Alaska's public processes involving fish and wildlife, public lands, access, and resource management.

AOC supports responsible economic and energy development. Our concern is whether permanently transferring more than 31 square miles of State land is necessary when the specific projects, tenants, development footprints, and acreage requirements remain largely undefined.

Alaska Law Favors Retaining State Land in Public Ownership

AS 38.04.015, **Public Interest in Retaining State Land in Public Ownership**, is directly relevant to this proposal.

The statute recognizes that it is in the public interest to retain State land in public ownership unless the land is appropriately transferred into private ownership or otherwise disposed of consistent with law and the State's land-use planning process.

A conveyance of nearly 20,000 acres should therefore require a clear demonstration that permanent transfer is necessary and provides a greater public benefit than continued State ownership.



AOC believes development can proceed without unnecessarily disposing of the public's land. The State can retain title while leasing acreage required for specific industrial projects, granting easements for utility and transportation corridors, and making additional sites available as demonstrated needs arise.

The acreage committed to development should follow demonstrated need rather than precede it.

Public Access and Traditional Use Must Be Protected

This land is part of a larger public landscape used for hunting, fishing, trapping, snowmachine and ORV travel, dog mushing, recreation, and access to surrounding lands and waters, including the Little Susitna River area.

DNR itself acknowledges the potential loss of public access to State land and reduced access to trails and an area traditionally used for travel and outdoor recreation.

AOC strongly supports protection of all RS 2477 rights-of-way, section-line easements, historic trails, and other existing public access. However, preserving a trail easement through AIDEA-controlled land is not equivalent to preserving the public-land access that exists today.

Hunters, trappers, anglers, and other outdoor users often depend upon the ability to leave established routes, reach surrounding lands and waters, connect between trails, and disperse across public land where lawful.

Protecting a legal trail corridor is not the same as protecting the public recreational landscape surrounding it.

DNR should evaluate that loss of general public access when determining whether this conveyance serves the public interest.

Public Ownership Provides Long-Term Protection

The State currently owns this land on behalf of the people of Alaska. Public ownership provides long-term opportunities for access, recreation, fish and wildlife use, and future resource management that may not be recoverable once title is transferred.



AOC is particularly concerned that DNR proposes to waive the reversionary interest required by AS 38.05.810(g) unless the Commissioner determines that waiver is in the public interest.

If the State permanently transfers this land and relinquishes its reversionary interest, DNR should establish enforceable protections before conveyance that ensure the property continues to serve the public purposes used to justify its transfer.

Future financing, leasing, or development arrangements should not diminish existing public access or allow the public purposes supporting the conveyance to disappear over time.

The Scale Requires Strong Justification

Approximately 19,950 acres — more than 31 square miles — is an extraordinary amount of State land to convey when future development remains largely tenant-specific and undefined.

AOC therefore asks DNR to identify comparable large-scale conveyances previously approved under AS 38.05.810(a) and explain why permanent transfer of the entire tract is necessary rather than retaining State ownership and authorizing development incrementally.

The larger and more permanent the disposal of public land, the stronger the State's justification and safeguards should be.

AOC's Request

The Alaska Outdoor Council respectfully requests that DNR **not approve ADL 234762 in its present form.**

AOC asks the State to retain ownership wherever possible; authorize legitimate development through leases, easements, permits, or phased land actions based upon demonstrated need; preserve RS 2477 rights-of-way, section-line easements, historic trails, traditional access, and connectivity; and ensure that any land ultimately conveyed remains subject to enforceable protections serving a continuing public purpose.



Alaska can pursue responsible economic development while preserving the public lands and access upon which generations of Alaskans have depended.

Alaska should develop what is needed while protecting what does not need to be given away.

Respectfully,

Alaska Outdoor Council Board of Directors