



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Natural Resources**  
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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June 27, 2025

Seth English-Young  
Planning Team Lead  
Western Federal Lands, Highway Division  
Federal Highway Administration  
610 E 5th St.  
Vancouver, WA 98661

Submitted via email to [seth.english-young@dot.gov](mailto:seth.english-young@dot.gov)

Re: McCarthy Road Planning and Environmental Linkages study, Chitina to Kennicott River crossing

Dear Mr. English-Young:

The State of Alaska (State) reviewed the Planning and Environmental Linkages (PEL) study report draft for the McCarthy Road corridor and provides the following comments. The study identifies potential transportation-related improvements for the McCarthy Road corridor, including improvements related to road condition and drainage issues, hazards such as landslides, and bridges and culverts. The comments below incorporate review by and input from the Departments of Natural Resources (DNR) and Fish and Game (ADF&G).

DNR again asserts management authority for State lands, including the submerged lands, tidelands, and shorelands of navigable waters within the State. This authority includes management of navigable waters, tidelands, and shorelands within and adjacent to the boundaries of federal lands, including conservation system units created under the Alaska National Interest Lands Conservation Act (ANILCA). These submerged lands include but are not limited to McCarthy Creek, Kennicott River, East Fork Kennicott River, Lakina River, Long Lake, Moose Lake, Chokosna River, Kuskulana River, Chitina River, and the Copper River. The State requests that this authority be acknowledged in the final PEL.

The State has an interest in the RS 2477 transportation easements in the vicinity of the PEL study area, including but not limited to RST 1794 Bellum's Crossing-Taral, RST 1416 Chitina Elliot Trail, RST 1805 Chitina River-Strelna Trail, RST 372 Nikolai Mine Trail, RST 121 Kotsina Trail, RST 135 McCarthy-Green Butte, and RST 1349 Kennicott Mine Trails. The draft PEL acknowledges the existence of these RS 2477s, but with the caveat that "The State of Alaska and NPS interpret these rights-of-way differently". The State again asserts management authority of these rights-of-way and emphasizes the importance of these routes for resource development and overland travel in Alaska.

It is in the public's best interest to preserve access to Alaska National Interest Conservation Act (ANCSA) 17(b) easements in the vicinity of the corridor, including but not limited to 33aE

which accesses 33 E within C04S05E12 and C04S06E7, 14a D1 which accesses 14 D1 within C04S06E7, and 1g, C3, C5, D1, and L which cross the Edgerton highway within C04S07E23.

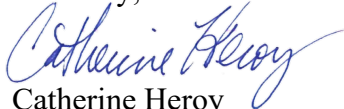
Further information about the location of RST or 17(b) access easements can be provided by DNR upon request, if needed. DNR suggests that any future road development take these routes into consideration, as their locations could result in higher traffic or user needs such as parking needs at trailheads in the future.

As a reminder, if any federal public lands will be withdrawn, reserved, leased, or otherwise used, ANILCA Section 810 details specific procedures required to evaluate the effect such use, occupancy, or disposition will have on subsistence uses and needs, and the availability of other alternatives which would reduce or eliminate the effects on subsistence uses or needs.

### **Closing**

Thank you for the opportunity to review and comment on this proposed project. Please contact me at (907)269-0880 or by email at [catherine.heroy@alaska.gov](mailto:catherine.heroy@alaska.gov) to coordinate any follow up discussions.

Sincerely,



Catherine Heroy  
Federal Program Manager