



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

Anchorage Field Office

4700 BLM Road

Anchorage, Alaska 99507-2591

<http://www.blm.gov/ak>

In Reply Refer To:  
6250 (AKA012)

MAY 27 2011

Mr. Frederick Thompson  
State of Alaska Pipeline Coordinator  
411 W. 4<sup>th</sup> Avenue  
Anchorage, AK 99501-2324

Dear Mr. Thompson:

The Alaska Gasline Development Corporation has applied for a Right-of-Way (ROW) lease for the construction and operation of a natural gas pipeline between the North Slope and Cook Inlet (the Alaska Stand Alone Gas Pipeline or ASAP). The segment of the proposed ASAP ROW south of Willow would cross the Iditarod National Historic Trail (INHT) and other regionally significant trails that contribute to the historic value of the Trail in this location

The Bureau of Land Management (BLM) Anchorage Field Office (AFO) is the statutorily-designated federal Administrator for the Iditarod National Historic Trail (INHT), and is the federal point-of-contact for Trail wide matters, including lands outside of federal ownership. Our two main concerns are the potential impacts of the proposed ASAP ROW crossing of the INHT, and cumulatively the impacts of the pipeline on other regionally significant trails that contribute to the historic value of the Trail.

Most of the concerns described below would be alleviated by the co-location of the pipeline in the proposed alignment of Port MacKenzie Alaska Railroad (ARR) Extension. Given that co-location of the pipeline in other transportation corridors is a stated objective of the project, and is proposed to be collocated in the Parks Highway or Alaska Railroad ROW for the majority of the pipeline route south of Fairbanks, we feel that an alignment following the railroad extension should be considered as an alternative.

Another re-route variation we would recommend is to re-align the pipeline ROW south of the Nancy Lake area to follow one of the existing non-historic trails (i.e., Crooked Lake Trail) eastward approximately four miles to an intersection with the railroad extension, at which point it would follow the railroad to the proposed extraction facility (see attachment "p.614-615 ARR FEIS annotated"). Such a route would be advantageous not only to the INHT but to other regional trails as it would prevent new intrusions and impacts to the trail system.

As proposed, the impacts of concern to the INHT are:

SPCO-20110527-12

1. visual degradation to the historic trail viewshed by removal of a wide corridor of adjacent native vegetation on both sides of the Trail,
2. safety-related impacts to the trail treadway surface from pipeline fill and/or spoils causing abrupt obstacles and/or grade changes for trail users,
3. impacts to the Trail treadway surface east and west of the pipeline crossing site, caused from the pipeline ROW being used as a new access routes for large vehicles or ATV's that previously did not have access to the Trail, and
4. impacts from unauthorized ATV or vehicular traffic to the historic or recreational resources associated with the Iditarod Trail Crossing Public Use Site on the Little Susitna State Recreational River

Impacts to other regionally significant trails are of concern because the recent Final Environmental Impact Statement for the ARR Extension described these trails as comprising a potential Iditarod Dog Sledding District that would be part of a Programmatic Agreement associated with this project. (See attachment for location trails relative to proposed pipeline route.) We are concerned that impacts to these trails from the pipeline, similar to those impacts listed above, would diminish their contribution to future use and enjoyment of the INHT, and should be included in any National Historic Protection Act Section 106 Programmatic Agreement regarding the pipeline.

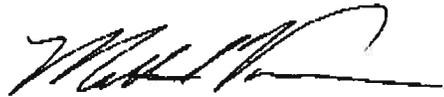
In order to minimize impacts to the INHT and other regionally significant trails, we recommend the following actions:

1. A subsurface crossing of the INHT corridor that maintains native vegetation buffer. For the INHT, choose a pipeline ROW that intersects the Trail in an area where tall, thick native vegetation currently exists. Maintain an undisturbed trailside vegetation buffer the width of the existing State management corridor for the Trail (500 feet on each side of the Trail centerline), and use directional drilling methods to insert the pipeline below the undisturbed trail corridor (such as is used to cross under rivers).
2. Similar directionally drilled and inserted crossings of other regionally significant trails with undisturbed vegetation buffers should be undertaken in locations where unauthorized vehicle/ATV access cannot be prevented.
3. Vehicle barriers should be installed in a manner that effectively prevent unauthorized vehicle access but allow for continued use of existing trails for winter users. Any permanent service or maintenance roads that are developed for the project, including the actual physical path of the pipeline, should include barriers or structures that effectively prevent unauthorized vehicle entry.
4. If the only practical solution for pipeline crossings at other non-INHT trails requires ROW clearing, the width of the clear zone should be significantly minimized on both sides of pipeline approaches to the trail from the proposed construction ROW width of 100 feet. The proposed ROW width in these sensitive areas can be minimized as demonstrated in the 2006 installation of a co-located 18 inch water main and 14 inch water main within a 40 foot wide construction ROW by the City of Palmer through the extremely hilly Matanuska Lakes State Recreation Site.

5. All remaining overburden, spoils or unused fill should be removed of and disposed of off-site. No spoils, overburden or unused fill should be disposed of within any existing trail corridor.

The INHT is a significant cultural and recreational resource of national and international stature. Since the late 1970's, BLM has worked closely with the State of Alaska to undertake cooperative efforts for the management and improvement of the INHT, as detailed in the Comprehensive Management Plan for the Trail. We appreciate your consideration and actions that will maintain the important values associated with the Trail. If you have further questions or comments, please contact the INHT Administrator Kevin Keeler at [kkeeler@blm.gov](mailto:kkeeler@blm.gov) or (907) 267-1207.

Sincerely,



Matthew S. Varner  
Field Manager, Acting

Enclosure

CC:

Earle Williams, BLM ASO-961

U.S. Army Corps of Engineers  
P.O. Box 6898 (CEPOA-RD-S)  
Elmendorf AFB, Alaska 99506-0898  
Attn: Ms. Serena Sweet, Project Manager, ASAP EIS

State Historic Preservation Office  
State of Alaska  
550 W. 7th Ave. Suite 1310,  
Anchorage AK 99501-3565  
Attn: Ms. Judy Bittner, State SHPO

State of Alaska Iditarod Easements Project  
Alaska DNR Division of Mining, Land and Water  
Southcentral Region Office  
550 W. 7th Ave., Suite 900C  
Anchorage, AK 99501-3577  
Attn: Lesli Schick

Community Development Department  
Mat-Su Borough  
350 E. Dahlia Ave.  
Palmer, AK 99645  
Attn: James King, Community Development Director

Parks, Recreation and Trails Advisory Committee  
Mat-Su Borough  
c/o Mat-Su Borough  
350 E. Dahlia Ave.  
Palmer, AK 99645  
Attn: Chairperson

Iditarod Historic Trail Alliance  
POB 2323  
Seward, AK 99664

---

Knik-Fairview Community Council  
P.O. Box 877476  
Wasilla, AK 99687-7476  
Attn: Chairperson

Knik Iditarod Trailblazers  
HC 30 Box 5460  
**Knik**, AK 99854  
Attn: Chairperson

Willow Area Community Organization  
PO Box 1027  
Willow, AK 99688  
Attn: Chairperson

Willow Trails Committee  
PO Box 845  
Willow, AK 99688  
Attn: Chairperson

**Big Lake** Community Council  
P.O. Box 520931  
**Big Lake**, AK 99652  
Attn: Chairperson

Big Lake Trails Committee  
PO Box 520705  
Big Lake, Alaska 99652  
Attn: Chairperson

potential alternative alignment of ASAP ROW within AK RR extension

Port MacKenzie Rail Extension Final Environmental Impact Statement

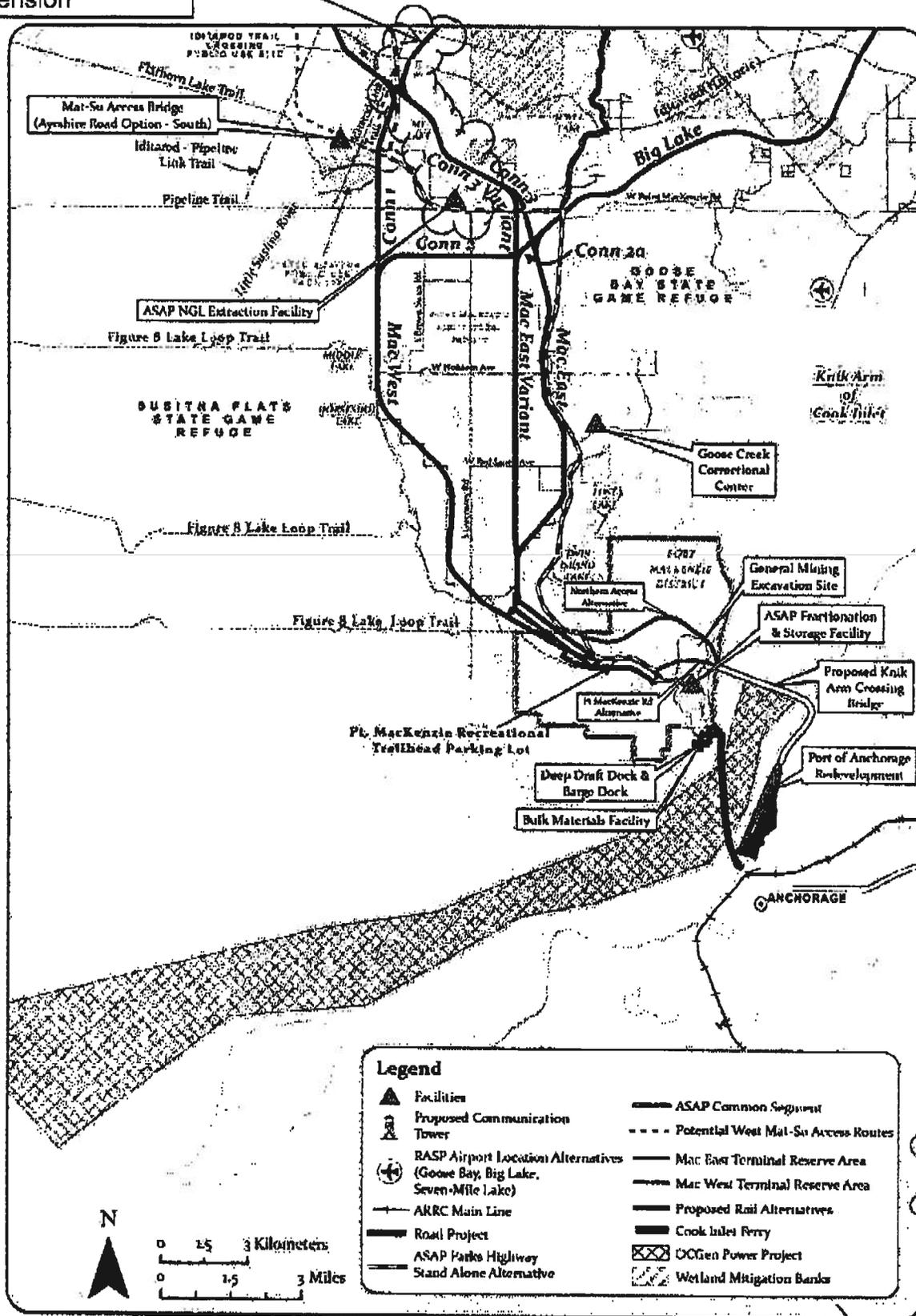


Figure 16-1. Other Projects Located Near the Mac East, Mac West, Mac East Variant, and Connector Segments

Port MacKenzie Rail Extension Final Environmental Impact Statement

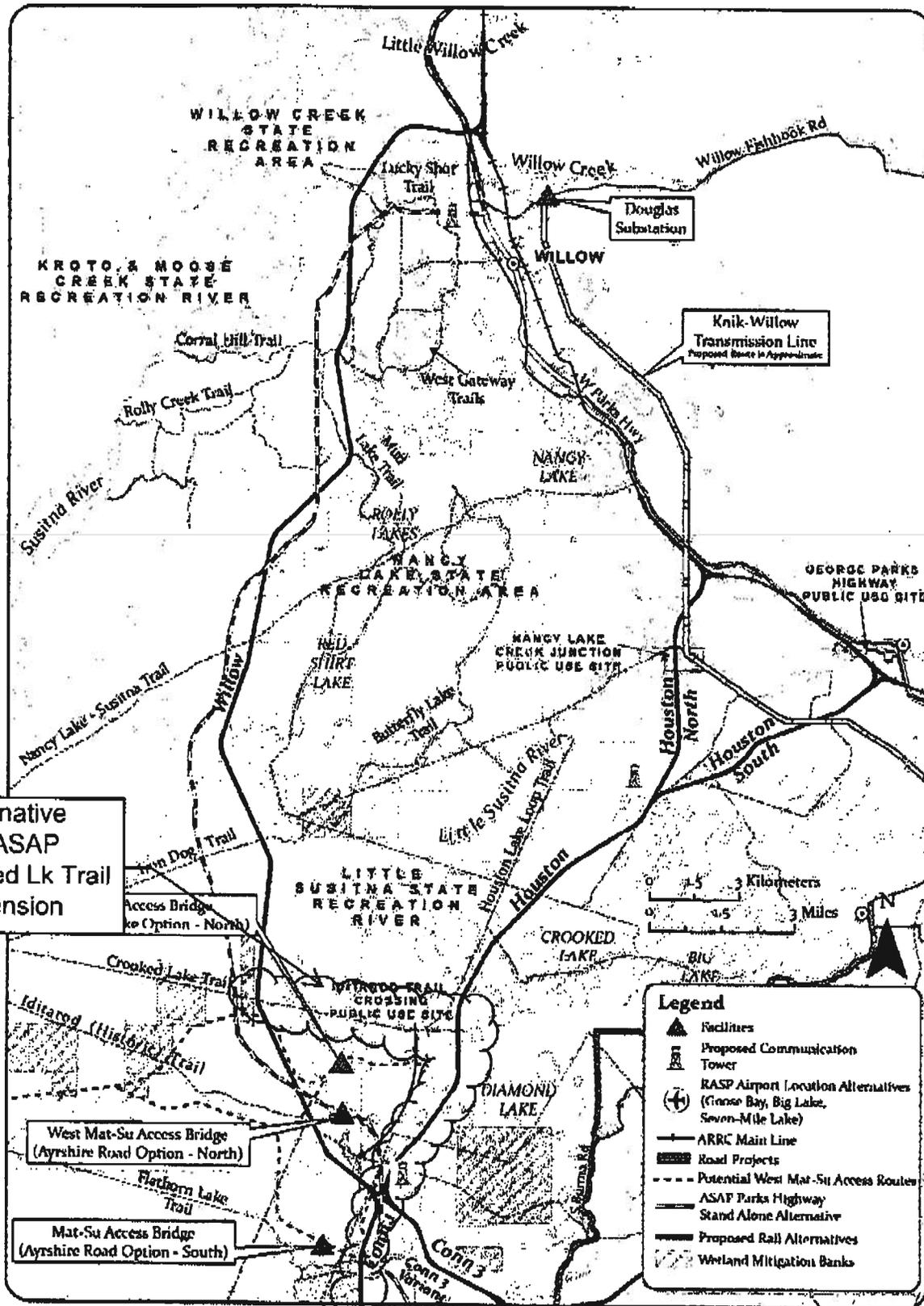


Figure 16-2. Other Projects Located Near the Willow and Houston Segments