



May 20, 2024

Ms. Mary Hermon
Division of Mining, Land and Water
550 West 7th Avenue, Suite 640
Anchorage, Alaska 99501

RE: Petersburg Borough Municipal Land Selections ADL 108982, 108983, and 108984 dated APRIL 18, 2024.

Dear Ms. Hermon,

The Petersburg Borough has completed its preliminary review of ADL 108982, 108983, and 108984 dated APRIL 18, 2024.

The Petersburg Borough supports the LCS's decision to convey approximately 1,758.17 acres of state owned vacant, unappropriated, unreserved (VUU) general grant land on Mitkof Island.

The Petersburg Borough has the following additional comments regarding statements in the Preliminary Decision:

Section VI.

B.3. The PD establishes that the mineral estate is reserved to the state. Under Mineral Order 279, all parcels on NE Mitkof are closed to mineral entry. Thank you for clarifying that there are no other known mineral orders affecting these selections.

D.2. The borough concurs with the LCS that there are no RS-2477 rights-of-way with the selected lands.

D. 4. The borough concurs with the LCS that there are no known navigable waters bordering or within the selected lands.

D. 4. The borough notes that no waters navigable in fact have been identified by the state in this decision.

D. 4. The borough notes that the LCS does not propose any alternative upland access routes to be reserved under 11 AAC 51.045(d)(1).

D.4. The borough concurs with the LCS that the beds of public waters are to be conveyed to the borough with the adjoining approved lands.

Section IX.

B.4 The borough concurs with the LCS that administration of public easements for the surface estate on land to be conveyed will be transferred when the FFD becomes effective.

B.5 The borough concurs with the LCS that administration of any active state leases and permits for the surface estate on land to be conveyed will be transferred when the FFD becomes effective. Accordingly, ADL 107871 and 107869 should be transferred to the borough as these represent surface estate permits. In the case of ADL 107869, the material site contract was issued to the then-City of Petersburg. Similarly, ADL 106335 is leased to the Petersburg Borough and will be transferred upon approval of the FFD.

Lastly, the borough appreciates ADNR labeling the FDRs, AWCs, and ADLs on the attachments. This addition makes review of the PD much more efficient.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Liz Cabrera". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Liz Cabrera
Municipal Land Agent
Petersburg Borough