



**STATE OF ALASKA**  
**DEPARTMENT OF NATURAL RESOURCES**

**Dalton Highway Corridor**  
**RS 2477 Rights-of-Way**  
**Commissioner's Finding**  
**ADL 422765**

## **1. Proposed Action**

In the October 9, 2025 Memorandum of Agreement (MOA) signed by the State of Alaska (State), Department of Natural Resources (DNR), Alaska Department of Fish and Game (ADF&G), Department of Transportation and Public Facilities (DOT&PF), and the Bureau of Land Management (BLM) (included as Attachment A), the signatory parties agreed to specific actions that would be taken to minimize adverse impacts to federal subsistence uses resulting from the revocation of Public Land Orders (PLO) 5150 and PLO 5180. This MOA included a commitment from the State to ensure motorized access for uses, including Federal subsistence use, to lands within, adjacent to, and beyond the PLO 5150 corridor consistent with state law.

The purpose of this decision is to authorize the use of snowmachines during the winter season on select routes within the Dalton Highway Corridor (DHC), thereby providing motorized access on routes that would otherwise be restricted by prohibitions within the DHC. This action will be accomplished through the authority of the commissioner of DNR to authorize motorized use of existing easements on state land within the DHC under Alaska Statute (AS) 19.40.210(c). DNR will utilize the RST casefiles for identification of accepted routes.

In addition to serving as an industry supply route to the North Slope of Alaska, the DHC also provides highway access to communities, resources, and trails located along or adjacent to the highway. Motorized off-road vehicles are often the primary means by which individuals are able leave the highway corridor and travel through the region for social, economic, and recreational activities. Over time, routes that are best suited for overland travel have been established, and many of these routes are legally recognized by the State as Revised Statute (RS) 2477 Rights of Way (ROWs) by both state and federal authorities.

DNR is responsible for managing Alaska's natural resources, and for facilitating public access to state lands and waters. Consistent with the MOA signed by DNR, ADF&G, DOT&PF, and BLM; DNR, through this decision, will authorize winter snowmachine use on the existing RS 2477 ROWs identified in this decision under the authority granted through AS 19.40.210. ROWs identified in this decision will have the same legal meaning as an easement<sup>1</sup>. To minimize impacts to the lands and waters, this use will only be allowed between November 1<sup>st</sup>

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<sup>1</sup> Sierra Club v. Hodel, 848 F.2d 1068, 1083 (10<sup>th</sup> Cir. 1988), *overruled in part on different grounds by* Los Ranchos de Albuquerque v. Marsh, 956 F2d 970, 973 (10<sup>th</sup> Cir. 1992).

and April 15<sup>th</sup> annually. Winter uses on the ROWs that exceed Generally Allowed Use limits under 11 AAC 96.020, may be authorized on an individual basis by DNR.

DNR proposes to authorize snowmachine use within the DHC on RS 2477 ROWs that have been identified and accepted by the legislature under AS 19.30.400. RS 2477 ROWs included within this authorization will include, but are not limited to, the portions of the routes listed below as they exist within the DHC:

- RST 9: Coldfoot – Chandalar Lake Trail
- RST 38: Tramway Bar
- RST 209: Bettles – Coldfoot Trail
- RST 254: Wiseman – Chandalar Trail
- RST 262: Caro- Coldfoot Trail
- RST 412: Slate Creek Trail
- RST 450: Hickel Highway
- RST 591: Coldfoot – Junction Trail 49
- RST 899: Hammond River Trail
- RST 1611: Bergman – Cathedral Mountain Trail

A general description of these routes can be found in the corresponding ADL file within the Land Administrative System (LAS). Note: the attached map (Appendix B, Figure 1) is a graphic depiction of these routes, which have not been located by survey and are subject to change.

## **2. Authority**

The authorities undertaken by this project include:

AS 19.40.010: The Alaska legislature codified an official declaration of policy for the Dalton Highway in Chapter 40 of Title 19. AS 19.40.010 states that the reasons for building the Dalton Highway include, in part, settlement of the land and development of its resources, and commercial access to natural resources north of the Yukon River for utilization and development.

AS 19.40.210: AS 19.40.210(a) prohibits the use of off-road vehicles within the DHC, with some exceptions. AS 19.40.210(c) provides the commissioner of DNR with the authority to authorize easements on state land within the DHC from the E.L. Patton Bridge north to the southern boundary of the North Slope Borough to facilitate access for purposes not covered under AS 19.40.210(a)(1)-(4), and to provide motorized access to adjacent federal land, native

allotments, and land conveyed to or held by Alaska Native corporations under the Alaska Native Claims Settlement Act (ANCSA).

Revised Statute 2477 and AS 19.30.400: Revised Statute 2477 (RS 2477), formerly codified as 43 USC 932, was section 8 of the Mining Law of 1866. RS 2477 provided: "The right of way for the construction of highways over public lands, not reserved for public uses, is hereby granted." Under AS 19.30.400, the State of Alaska codified the RS 2477 ROWs that have been accepted by use or by administrative action.

### **3. Scope of Findings**

The Scope of this decision is to determine whether it is in the State's interest to authorize winter use of snowmachines along dedicated RS 2477 routes identified within the DHC, and what, if any, limits to that use may be imposed. The scope is based on the statutes, regulations, and other facts contained in the body of this decision.

### **4. Administrative Record**

The administrative record for the proposed action consists of the Constitution of the State of Alaska, the Alaska Land Act as amended, applicable statutes and regulations referenced herein, the Dalton Highway Master Plan (1998) and other classification references described herein, and the casefile for the action serialized by DNR as ADL 422765.

### **5. Findings**

#### AS 19.40.010 and Article VIII, Sections 1 & 2 of the Alaska Constitution

The primary reasons and purposes for the DHC are defined in AS 19.40.010. A brief discussion of how those purposes would be affected by the proposed action is included below:

- Consistency with Article VIII, Section 1 of the Constitution of the State of Alaska;
  - Article VIII of the Constitution of the State of Alaska provides that the policy of the State is "to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest," and that the legislature "shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people." The proposed action will further assist in the fulfillment of Article VIII, Section 1 of the Constitution of the State of Alaska by enhancing access to regions available for settlement and development through traditional means of transportation.
- Benefits to local and interstate commerce because "the area north of the Yukon River is rich in natural resources but is inaccessible at the present time because of the lack of roads" (A.S. 19.40.010(a)(4)).
  - Use of motorized off-road vehicles within the DHC for natural resource extraction (including exploration, development, production, and transportation) is already allowed under AS 19.40.210(a)(1) and (2). The proposed action would not affect the current uses allowed under this statute.
- Consistency with Article VIII, Section 2 of the Constitution of the State of Alaska in which

“it is provided that the legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the state, including land and water, for the maximum benefit of its people”.

- The proposed action will maintain all existing opportunities for fulfillment of Article VIII, Section 2 of the Constitution of the State of Alaska.
- The legislature found that the construction of the Dalton Highway would “not impair the natural wilderness adjacent to the highway and will not unreasonably interfere with subsistence hunting, fishing, trapping, and gathering.”
  - A primary purpose of the proposed action will be to preserve existing opportunities for federally qualified subsistence users to use motorized vehicles in the DHC to access federal lands for subsistence purposes, and to expand opportunities for hunting, fishing, trapping, and gathering for all Alaskans.

Based on these findings, DNR determines that the decision to authorize winter snowmachine use on accepted RS 2477 routes through the DHC for social, economic, and subsistence purposes is consistent with the provisions of the Constitution of the State of Alaska, consistent with the intent of the legislature, and in the interest of the citizens and industries of Alaska.

#### AS 19.40.210

AS 19.40.210 (c) provides the commissioner of DNR with the authority to authorize easements on state land within the DHC from the E.L. Patton Bridge north to the southern boundary of the North Slope Borough to facilitate access for purposes covered under AS 19.40.210(a)(1)-(4), and to provide motorized access to adjacent federal land and land conveyed to or held by Alaska Native corporations under the Alaska Native Claims Settlement Act (ANCSA). The limitations enumerated in 19.40.210 do not limit DNR’s ability to permit uses, provided those uses do not directly conflict with the statute. Based on this authority, DNR finds that the proposed action is consistent with the intent of legislature to provide the commissioner of DNR with the authority to authorize winter snowmachine use for the purposes described herein.

#### Northeast Alaska Area Plan

The Northeast Alaska Area Plan (NEAAP), adopted in February of 2026, supersedes existing land classifications in the planning area and provides area-wide management guidelines and objectives for lands within the plan boundary. Prior to the development of the Northeast Alaska Area Plan (NEAAP), the 1998 Dalton Highway Master Plan was developed by the Dalton Highway Advisory and Planning Board, with input from the public, to provide recommendations for sound economic development, public safety and prudent natural resource management along the Dalton Highway. Nothing in the Dalton Highway Master Plan is intended to conflict with federal, state, or local laws or regulations.

Below are the area-wide guidelines and objectives relevant to the DHC, and a brief discussion of how the proposed action is consistent with the management intent in the NEAAP for the DHC.

- Guideline A-1 *Preservation of Access Opportunities* states that DNR “shall preserve existing access routes, and may identify additional potential access to, through, and within the planning area.”
  - The proposed action will expand opportunities for access on existing routes.
- Guideline A-3 *Retain Access* addresses the area-wide management intent of RS 2477s. This guideline directs the State to “improve or preserve public access to areas with significant public resource values by retaining access sites and corridors in public ownership” and by “identifying, managing and legally validating RS 2477 rights-of way.”
  - The proposed action is in alignment with Guideline A-3's intent to retain and improve access to areas with significant public resource values by authorizing winter snowmachine uses along codified RS 2477 routes.
- Guideline A-6 *Access to Non-State Lands* provides that “reasonable access will be provided across state lands to other public and private lands.”
  - Consistent with the 2025 MOA, the proposed action will provide reasonable access across state lands to other public and private lands along codified RS 2477 routes. Preserving access to non-state lands for federally qualified subsistence users has been identified as a primary concern during the revocation of PLO 5150 and is likewise one of the primary reasons for authorizing motorized use along RS 2477 routes.
- Objective B-1 addresses opportunities and processes for preserving access, and describes a process in which “local access needs are identified” and access trails are preserved. Preservation of access under this objective is to be accomplished through “retention of state land in public ownership or through the creation of a public use easement.”
  - RS 2477 routes are already managed as public use easements in Alaska. The proposed action will consider local input to make sure that local access needs are identified, and will incorporate that input into the final decision.
- Objective B-3 *Width of Access Corridors* defines the width of “trails or other access facilities of statewide or regional significance” to be no less than 100 feet in width.
  - The proposed action will define the width of the RS 2477 routes included in the scope to be 100 feet.
- The NEAAP describes the management intent for Unit D-01 in the resource allocation table. The DHC is to be managed “as a utility and transportation corridor to facilitate transportation of oil and gas resources from the North Slope to facilities in other areas of the state and to support hunting, fishing, gathering, and recreation opportunities.” This intent includes the stipulation that “authorizations that may impact RS 2477 routes should ensure that access is maintained.”
  - The authorization of winter snowmachine use is designed to facilitate opportunities including, but not limited to, hunting, fishing, gathering, and recreation, by maintaining

access to established RS 2477 routes.

### Survey Requirements

This action does not constitute a disposal or modification of any property interest, therefore no survey requirement exists.

## **6. Federal Related Actions**

### Alaska National Interest Lands Act (ANILCA) Section 810(a)(3)(c)

Section 810(a)(3)(c) of ANILCA requires that any “withdrawal, reservation, lease, permit, or other use, occupancy or disposition” of lands which would significantly restrict subsistence uses must include a determination that “reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions.”

In January 2025, the Executive Order “Unleashing Alaska’s Extraordinary Resource Potential” directed the Secretary of the Interior, among other things, to evaluate changes to, including the potential revocation of, PLO 5150. To minimize adverse impacts upon subsistence uses and resources resulting from the anticipated revocation of PLO 5150 and PLO 5180 and the subsequent conveyance of top-filed State land selections, the State of Alaska worked with the BLM to draft a Memorandum of Agreement (MOA) describing the reasonable actions agreed to by both parties. The primary action detailed in the MOA was the authorization of motorized transportation on RS 2477 routes for the purpose of providing access to the Federal Public Lands adjacent to the DHC, access that would otherwise be restricted by the prohibitions under AS 19.40.210. The authorizations proposed in this decision are the direct result of that MOA, and the State’s commitments made therein.

## **7. Authorizations**

### Alyeska Property Interest

The Alyeska Pipeline Service Company (Alyeska) operates and maintains the Trans Alaska Pipeline System (TAPS). Alyeska’s property interests include the TAPS ROW, access roads, pump stations, and all associated infrastructure. RS 2477 routes are subject to these existing valid authorizations.

## **8. Notice of the Decision**

Notice will be posted on the State of Alaska's Online Public Notice System at <http://aws.state.ak.us/OnlinePublicNotices/Default.aspx> and sent to the post offices located in Coldfoot, Wiseman, and Bettles.

## 9. Approval

In consideration of the authorities and criteria listed above, I hereby determine that this decision to authorize the winter use of snowmachines on select routes within the Dalton Highway Corridor (DHC), is consistent with DNR's mission, that this action is consistent with legislative direction and administrative management intent for this land and that authorization of the described use above is in the interest of the State of Alaska. This decision takes effect immediately. The Department assumes no responsibility for maintenance or liability for injury or damages attributable to this authorized use.



4/3/2026

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John Crowther, Commissioner-Designee

Date

### Reconsideration

An eligible person affected by this decision may request reconsideration to the DNR Commissioner per AS 44.37.011 and 11 AAC 02. Any request for reconsideration must be received by the Commissioner's Office within twenty (20) calendar days after issuance of the decision under 11 AAC 02.040. The Commissioner may order or deny a request for reconsideration within thirty (30) calendar days after issuance of the decision. If the Commissioner takes no action on a request for reconsideration within thirty (30) days after issuance of the decision, the request for reconsideration is considered denied. The Commissioner's decision on reconsideration, other than a remand decision, is a final administrative order and decision of the department. An eligible person must first request reconsideration to the Commissioner before seeking relief in superior court. The Alaska State Courts establish its own rules for timely appealing final administrative orders and decisions of the department.

Reconsideration may be mailed or hand-delivered to the DNR Commissioner's Office, 550 W. 7th Avenue, Suite 1400, Anchorage, Alaska, 99501; or faxed to (907)-269-8918, or sent by electronic mail to [dnr.appeals@alaska.gov](mailto:dnr.appeals@alaska.gov). Reconsideration must be accompanied by the fee established in 11 AAC 05.160(d)(1)(F), which has been set at \$200 under the provisions of 11 AAC 05.160(a)-(b). A copy of 11 AAC 02 is available on the department's website at <https://dnr.alaska.gov/mlw/pdf/DNR-11-AAC-02.pdf>.

### Attachments

- Attachment A: Memorandum of Agreement between the United States Department of the Interior Bureau of Land Management and State of Alaska.
- Attachment B: Overview of PLO 5150 area depicting the RS 2477 routes that are included in the Commissioner's Decision.

**MEMORANDUM OF AGREEMENT**  
**between the**  
**UNITED STATES DEPARTMENT OF THE INTERIOR**  
**BUREAU OF LAND MANAGEMENT**  
**and**  
**STATE OF ALASKA**

**SUBJECT:** Developing reasonable steps to minimize impacts to Federal subsistence uses within the Dalton Utility Corridor by providing motorized access to Federal Public Lands adjacent thereto.

**I. PURPOSE**

This Memorandum of Agreement (MOA) serves to identify actions to minimize impacts to Federal subsistence use to ensure the United States Department of Interior (USDOI), Bureau of Land Management (BLM) compliance pursuant to the Alaska National Interest Lands Conservation Act (ANILCA) Section 810(a)(3)(C). These actions are intended by BLM to minimize adverse impacts upon subsistence uses and resources resulting from the potential revocation of Public Land Orders (PLO) 5150 and PLO 5180. As outlined below, the BLM finds these commitments will afford access to Federal lands for federally qualified subsistence users once State of Alaska (State) top-filed lands are conveyed to the State.

**II. BACKGROUND**

In January 2025, President Trump issued Executive Order (EO) 14153, “Unleashing Alaska’s Extraordinary Resource Potential,” which, among other things, directed the Secretary of the Interior (Secretary) to evaluate changes to, including the potential rescission of, PLO 5150. In response, the U.S. Department of the Interior (DOI) BLM is analyzing the revocation of PLOs 5150 and 5180 for Federal lands within the Dalton Utility Corridor north of the Yukon River.

Revocation of these PLOs for these Federal lands will allow approximately 2,066,000 acres of State “top filed” land selections under ANILCA Section 906(e) to become effective selections by the State. Once the selections attach, the lands will no longer meet the definition of “public lands” in Section 102(3) of ANILCA, and therefore provisions of ANILCA Title VIII will no longer apply. While these lands will still be available for subsistence use and general hunting and fishing for all Alaskans consistent with Alaska Department of Fish and Game (ADF&G) statutes and regulations, BLM finds that the loss of Federal subsistence priority under ANILCA as to these lands is an adverse impact of this action that must be minimized pursuant to ANILCA 810(a)(3)(C). Because the nature of this action leads to conveying these lands out of Federal ownership and to the State, the “adverse impact” identified by BLM to be minimized is access to federal lands that currently exists under Section 811 of ANILCA.

Provisions under AS 19.40.210 establish limits on the use of off-highway vehicles within five miles of the Dalton Highway, though it grants authority to the Commissioner of the Department of Natural Resources (DNR) to allow motorized access to adjacent Federal lands, Native allotments, and lands conveyed to and held by Alaska Native corporations under the Alaska Native Claims Settlement Act (ANCSA). Additionally, the State statute grants authority for the Commissioner of the Department of Transportation and Public Facilities (DOT&PF) to authorize

facilities and access roads in the highway right-of-way to achieve these purposes.

Section 810 of ANILCA provides that no public land uses which would significantly restrict Federal subsistence uses shall be effected until the Federal agency gives the required notice and holds a hearing in accordance with ANILCA Section 810(a)(1) and (2) and makes the three determinations required by ANILCA Section 810(a)(3)(A), (B), and (C). The three determinations that must be made are:

1. Such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands;
2. The proposed activity will involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other such disposition; and
3. Reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions.

The Central Yukon Resource Management Plan (CYRMP) Environmental Impact Statement (EIS) considered revocation of PLOs within the Dalton Utility Corridor within the range of alternatives. As part of that planning process, the BLM completed an evaluation of Federal subsistence uses and needs for all alternatives, consistent with the requirements of ANILCA Section 810(a), and these evaluations were published as Appendix R of the Final EIS for the CYRMP. However, the BLM only made determinations for the proposed plan, which did not recommend revoking the PLOs. The BLM is in the process of making new, separate ANILCA 810(a)(3) determinations for the revocation of PLOs within the Dalton Utility Corridor, and the commitments made in this MOA are intended to support that process.

The BLM identified access to ANILCA-defined public lands for Federal subsistence uses as one of the major issues to be addressed during the CYRMP planning process in its Section 810 evaluation. Because the land is under Federal management, the State has no current easements allowing motorized access for purposes of accessing Federal lands for Federal subsistence use and the conveyance of land to the State will effectively block motorized access to ANILCA-defined public lands unless the State grants an easement under AS 19.40.210, and other applicable authorities.

The commitments in this agreement address the need to minimize the adverse impacts of access through State processes.

### III. PARTIES

This MOA is hereby entered into by and between the USDO/BLM and the State; jointly referred to as the "Party" or "Parties."

### IV. THE PARTIES AGREE:

1. Section 810(d) states "After compliance with the procedural requirements of this section and other applicable law, the head of the appropriate Federal agency may manage or dispose of public lands under his primary jurisdiction for any of those uses or purposes authorized by this Act or other law."

2. Once the PLOs are revoked and the State selections become effective for the lands within the Dalton Utility Corridor, the BLM has no discretion in conveying the lands to the State pursuant to the Alaska Statehood Act.
3. Once the land is conveyed to the State, motorized access within and across the Dalton Utility Corridor to access Federal lands will be allowed when the Commissioner of DOT&PF or DNR authorizes a facility, access road, or easement pursuant to AS 19.40.210 or applicable authorities.
4. Due to the nature of this action and the change in land ownership that results, the primary opportunity to minimize impacts centers on access to the public lands, as defined in ANILCA, that will remain within and/or bordering the Dalton Utility Corridor after revocation and subsequent land conveyance are complete.
5. Consistent with existing authorities, any person, group, agency, or entity may apply to DNR or DOT&PF for an easement, facility, or access road for public or private use.
6. In order for BLM to comply with ANILCA Section 810(a)(3)(C) and take reasonable steps to minimize potential adverse impacts to Federal subsistence uses, while implementing the direction in EO 14153, the parties will develop and implement a process to facilitate access to adjacent Federal public lands pursuant to this agreement.

Commitments in this agreement will inform the BLM's ANILCA Section 810 determination that reasonable steps will be taken to minimize the adverse impacts upon Federal subsistence uses.

#### V. AUTHORITIES

The BLM enters this agreement pursuant to the following authorities:

- Alaska National Interest Lands Conservation Act, Pub. L. No. 96-487, 94 Stat. 2371 (1980);
- 307(b) of the Federal Land Policy and Management Act of 1976, 43 USC § 1737(b).

The State enters this agreement pursuant to the following authorities:

- Alaska National Interest Lands Conservation Act, Pub. L. No. 96-487, 94 Stat. 2371 (1980);
- Alaska Statehood Act, Pub. L. 85-508, § 6, 72 Stat. 339 (1958);
- AS 19.40.210(c).

#### VI. AGENCY RESPONSIBILITIES

1. The State agrees:
  - i. It is a fundamental responsibility of the state government to provide access for Alaskans, including development and maintenance of infrastructure, as well as the enhancement of local and state economies. Thus, the State is best positioned to – and herein commits to – take steps to ensure motorized access for uses, including Federal subsistence use, to

- lands within, adjacent to, and beyond the corridor. This responsibility will rest with the State once the land has been conveyed to the State.
- ii. The Commissioner of DNR will authorize motorized use on public easements under AS 19.40.210 for each valid, existing RS 2477 routes identified by the State as soon as practicable, but not later than 30 days, following tentative approval.
  - iii. As soon as practicable, and prior to the conveyance of the lands within the corridor, the State will initiate a robust public process to engage stakeholders including Federal subsistence users and to identify facilities, access roads, or easements that may be necessary to access adjacent Federal, Alaska Native corporation lands, and Native allotments, pursuant to existing authority to establish easements under AS 19.40.210.
  - iv. The public process identified in subsection VI(1)(iii) will identify and prioritize the survey of appropriate Section Line Easements (SLEs) pursuant to AS 19.40.210 to provide motorized access to adjacent Federal public land, Native allotments, and Alaska Native corporation lands.
  - v. Decisions that the State makes under AS 19.40.210 will facilitate access, and any denials will not unreasonably interfere with motorized access for users, including Federally qualified subsistence users.

2. The BLM agrees:

- i. To share with the State notes and records from the tribal consultation process for the CYRMP referenced above to help the State identify local issues and inform its proposed public process.
- ii. To provide the State with all subsistence use data and analyses for the subject lands.
- iii. To prioritize timely conveyance of title to lands requested by the State upon revocation of PLOs 5150 and 5180, and subsequent opening order which would allow top-filed selections to become effective selections.
- vi. After title transfer, BLM will survey the lands in accordance with the Alaska Statehood Act and the Manual of Surveying Instructions 2009, and section lines in the interior of the selection will be protracted on the survey plats.

VII. TERM

The MOA becomes effective upon the date last signed and executed by the duly authorized representative of the Parties to this MOA. The MOA shall remain in effect until the access provisions herein are established on the ground unless terminated.

Either Party may terminate the MOA by providing thirty (30) days written notice to the other Parties, provided that the Parties will consult during the period prior to termination to seek agreement on amendments or other action that would avoid termination in order to ensure compliance with the terms the MOA.

VIII. GENERAL PROVISIONS

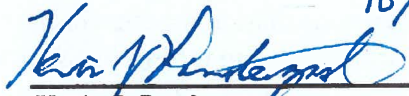


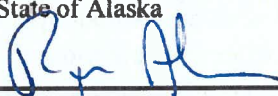
1. The BLM and the State, including their respective officials, employees, agents, and representatives, will carry out the terms of this MOA in good faith and shall make reasonable efforts to accomplish the purposes of this MOA.

2. Nothing in this MOA alters, amends, or affects in any way the statutory authority of the BLM or the State. It also does not expand nor is in derogation of those powers and authorities vested in the Parties by applicable law.
3. Nothing in this MOA, in and of itself, obligates the BLM or the State to expend appropriations or to enter into any contract, assistance agreement, or interagency agreement, or to incur financial obligations.
4. Any transaction involving transfers of funds between the parties to this MOA will be handled in accordance with applicable laws, regulations, and procedures under separate written agreements.
5. This MOA is not intended to, nor does it, create any right, benefit, or trust responsibility, substantive or procedural, enforceable at law or equity by any person or party against the United States or the State, their agencies, their officers, or any other person.

**IX. COUNTERPARTS**

This MOA may be executed in counterparts, and each copy will have the same force and effect as if signed by all Parties.

**X. SIGNATURES**

<p style="text-align: right; margin-right: 50px;"><i>10/9/2025</i></p>  <hr/> <p><b>Kevin J. Pendergast</b>          State Director, Alaska State Office          Bureau of Land Management          U.S. Department of the Interior</p>	 <hr/> <p><b>John C. Boyle, III</b>          Commissioner          Department of Natural Resources          State of Alaska</p>
 <hr/> <p><b>Doug Vincent-Lang</b>          Commissioner          Department of Fish and Game          State of Alaska</p>	 <hr/> <p><b>Ryan Anderson</b>          Commissioner          Department of Transportation and Public Facilities          State of Alaska</p>



