



October 25, 2021

Alaska Department of Natural Resources
Division of Mining, Land & Water
Southcentral Regional Land Office
550 West 7th Avenue, Suite 900C
Anchorage, AK 99501

Sent via electronic mail:

Re: Comstat Quarry Proposal - Material Site Designation 231512, ILMA 215567

Dear Carol Hasburgh and Commissioner Feige,

We thank you for providing an opportunity for the public to weigh in on the Comstat site quarry. Please accept this letter on behalf of the Susitna River Coalition (SRC) and add it to the ADL records for the site case file and for both ADL #231512 and ADL #215567. SRC has a number of concerns with this development, some of which we have outlined in this letter.

The Susitna River Coalition is based in Talkeetna, Alaska and has a broad membership of over 23,000 individuals, groups, and businesses. SRC works to protect the sustainable natural resources of the Susitna River Watershed and advocates for the protection and integrity of the healthy communities it sustains. Our members are dependent on the \$200 million dollars annually generated through tourism and recreation in the Susitna Watershed and rely on long-term plans that ensure vibrant salmon runs and pristine habitat long into the future.

The Talkeetna community has worked diligently to grow the economy and community around ecological principles and respect to the indigenous heritage in the area. This project presents extremely limited opportunity for public engagement and development and goes against the best interests, intentions, cultural and ecological strengths of Upper Susitna residents.

The proposed quarry will have immediate and long-term impacts on heavily used nearby recreation and nature areas that are an economic catalyst for locals and visitors. The plan to classify this land defied the long history and land use plans that exist for Talkeetna, plans that are designed to keep Talkeetna unique - and one of the reasons it is a top destination for both local and national tourism. DNR has not evaluated the trends in tourism that

support towns like Talkeetna and the elements that make it attractive to visitors. A large quarry in this space would greatly harm our economy.

Because of the proximity of this project to heavily used and ecologically productive lands, recreational lakes, subdivisions, recreational parks, and wildlife corridors in the surrounding area, mitigation efforts would be costly and complex, likely impossible to mitigate.

The water table here flows to the Talkeetna and Christiansen Lakes, where it comes up in the form of springs. There is no way to operate the parcel without impacting the water. Residents rely on wells in Talkeetna and groundwater will be affected. The operations of the past contractor have broken into a part of the water table, creating waterfalls and cascades from the quarry wall during early summer, which in 2021 slowed to a constant seep of running water throughout the driest part of the year. This water should have remained underground, filtered until it reaches its destination lakes. Instead, the water's closed system has been breached. This remains unaddressed.

We support the proposal put forth by the Comstat Area Lakes and Land Alliance (CALLA) and supported by the Mat-Su Borough in April 2021 to designate this area as wildlife habitat and public recreation land.

This quarry is clearly opposed by the community, will significantly hurt the economics of Talkeetna, and has been poorly researched with inadequate fish and wildlife surveys and no known cultural surveys.

Overall, as an agency tasked with both conserving and developing our resources, we encourage you to deny these ADLs and to better balance the importance of strong local economies and the development of an unnecessary and ill researched quarry. We encourage you to reconsider these proposed ADLs.

Sincerely,

Melissa Heuer

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