

Input Received in Comments:

Glennallen Meeting Comments 6/21/2021

Map 2

- Gravel Sources for new land subdivisions.
- Parking areas along major highways for access to public easements and trails.
- Develop access to Copper River for motorboat, rafts, fish wheels.
- Develop hiking (not ATV) trails in the greater Glennallen area and along Richardson Hwy and Tok cutoff.
- Glennallen Landfill (solid waste & wastewater) located North of Gulkana Airport. Was sited there the land was labeled for industrial use – No settlement. Also- the shooting range is north of the Airport. Neither of these sites should be around home sites.
- Maintain public access to Paxson Lake & boat launch
- Public access & boat launch on Gulkana River
- Parking for access to all 17b easements and trailheads off of major highways

Map 3

- Public access to Copper River – At Mile 102.5, across from the old pink Copper Center School, the river has eroded towards the Old Richardson, into highway right of way. This may be a great pull-out spot. Parking would need to be put here.
- Maintain Willow Lake pullout, update interp panels, create trail to Willow Mountain.
- Outhouse at Pippin Lake. Improve/widen pippin lake pullout. Improve public boat launch.
- Personal use firewood development.
- State land with good potential for gravel pit – the one at the intersection of Rich. Hwy and Brenwick-Craig is Ahtna's. State land is back behind in wooded area.
- Improve Access to Klutina Lake & maintain boat launches, create road around private land at 1 acre site by Klutina Lake. Develop camping on Kluntina Lake.
- Create (non-motorized) foot trails throughout Thompson Pass.
- Personal use wood cutting development.
- Overall- coordinate w/ Copper Basin Area Community. Protection plans for areas to be designated & developed as fuel/fire breaks.
- Outhouse Maintenance year-round
- No current access to Tazlina River & Lake for recreational use
- 17(b) easement/rs2477 up Klutina Rd. Status of state maintenance on road? Very difficult travel conditions.
- Trails/Access off Richardson Hwy recreational use needed full length

Map 4

- Campground development on McCarthy Road near Chitina/Copper Confluence. Camping is highly congested. There's a need for more outhouses, garbage pickup, transfer site, campground facilities.
- Parking/camping development near McCarthy. Outhouse/garbage transfer site needed.

Valdez Meeting Comments 6/22/2021**Map 3**

- Thompson Pass special use area needs some special regulations regarding helicopter skiing and other motorized activities. A big non-motorized zone is necessary. Also, tailgate Alaska needs to stop. It is really destructive. Don't give the land east of the hairpin turn at mile 23 Richardson to native corporation.
- Preserve responsible drone flight on public land, non-intrusive to animals, people, and land. Most drones are small, FAA reg keeps it withing 400 ft og a surface, within line of sight. Maybe specify useful line of sight (within 500-750 lateral ft of pilot). Even would be worth sharing media of state lands with the state. Also, drones are not really in the same category as "motorized" use.
- Restrict motorized access in some areas of Thompson pass. Please leave it for people who use their own energy. Helicopters, snowmobiles, etc. can be very disruptive.

Kenny Lake Meeting Comments 6/23/2021**Map 2**

- Why is this portion of the Denali outside planning area?
- Invasive Plant management throughout the Copper Basin.

Map 3

- North Tonsina Ag Project- to west was state & AHTNA selected pre-2008 at some point state dropped their selection here. This property could be (IF* AHTNA does not convey it) traded with BLM & become state land.
- Water is an issue in Kenny Lake along the Edgerton Hwy and the Old Richardson Hwy. Our area last year got 7 ½ inches of rain. Deserts are classified as 8". Most residents get their water at the firehall. In 2000 it was down for lack of water. Wells (ours) can be as deep as 320 Ft. Water quality is always questionable. Subdivision is not a good choice for us. Because ATHNA has big land parcels and the large homesteads open areas for hunting and berry picking are not readily available; another reason to not subdivide willow lake drains into willow creek. Williwow creek is our only running stream along in Kenny Lake and into the Tonsina River. Willow lake provides a drainage system that feed this creek. The state kand behind mile 3, Edgerton Hwy, is a part of this. It is swamp land and essential to willow creeks health.
- This should be opened up to traditional use as ag land farming & ranching & such
- 160 acres is titles as private land. Map does not reflect this. Note: all parcels in that specific spot are showing state selected on the map.
- Consider open this area to ag sales it presently boarder North Tonisna Ag Project.
- 1986 plan Eliminate "Do not exceed 18,000 acre" pg 2.8
- If there is a Wildlife Corridor (North Tonsina Ag Project 2004) eliminate it.

Chitna Meeting Comments 6/23/2021

- N/A

Mentasta Lake Meeting Comments 6/24/2021

- Would changes affect wood cutting permits on state land?

Anchorage Lunch Meeting Comments 7/6/2021

- Whitefish spearfishing

Anchorage/Cordova Meeting Comments 7/6/2021

- Why is Cordova named as the Prince William Sound Water District - and not the Copper River Water District. Although Cordova is at the confluence of both (and is now recognized as such via ecosystem science), the Copper River watershed surrounds this entire community, and is the driving economic, cultural and subsistence force for Cordova. As you know, Cordova was not listed in the DNR plan site, and is still not.
- What kind of amendments have happened in this area plan since 1986
- Silt, sediment, and nutrients from the Copper River feed into the gulf and then circulate all the way up to the Arctic, how much will potentially effected areas get in this plan

Anchorage Meeting Comments 7/8/2021

- N/A

Kenny Lake Fair 8/21/2021

- Primo soil in between the Copper and Klutina Rivers
- Room for agricultural development between Copper Center and Kenny Lake
- Agriculture opportunities just North of Copper Center
- Trade the land that is currently Native selected, convert to ag lands
- Mineral sites along the Richardson Hwy near Copper Center
- Pipeline crossing area Southwest of Copper Center
- Soil in the Native selected lands is poor quality and marshy

Comments Received through electronic methods or mail

- Management guidelines and goals should emphasize preventative activities. Thoroughly cleaning all equipment prior to use within the Copper River Basin Area, and especially after use in a known infested area, can reduce the spread of existing invasive plant populations. This is especially important since the opportunity for the introduction and spread of invasive plant species is due to ground disturbance associated with all management practices defined in the CRBAP (i.e. agriculture, forestry, transportation, trail management, subsurface resources, public access and settlement).Room for agricultural development between Copper Center and Kenny Lake
- Adhere to the Best Management Practices for Road Maintenance, which can be found in this manual hyper-linked below. This manual was created in partnership between multiple state agencies and the University of Alaska Fairbanks Cooperative Extension Service: http://cespubs.uaf.edu/index.php/download_file/1441/. The manual is also attached to this letter for your convenience. Trade the land that is currently Native selected, convert to ag lands
- Regarding material extraction and importation: All mineral materials, topsoil, and straw or hay should be certified as weed-free under the State of Alaska's Division of Agriculture weed-free certification program prior to use in road maintenance,

construction, or erosion control projects. Pipeline crossing area Southwest of Copper Center. Include recognition and mitigation tactics of the potential for vehicles, boats, and planes to transfer non-native invertebrates, vertebrates and fungi, in addition to terrestrial and aquatic plants.

- For new development projects, include baseline surveys of all species present prior to commencement of work; regularly schedule early detection surveys for invasive species during specific projects and after completion; prepare response plans in the event invasive species are detected to ensure rapid response; and implement post-response monitoring and assessment.
- These proposed revisions continue a very disturbing pattern or trend in recreation management of Alaska public lands, waters, and air (“public lands”) by the current administration. The Dear Alaskan letter (6/28/2021) makes things very clear: DNR “is proposing to revise its regulations to allow additional use of Alaska State Parks....” And later: DPOR “wants to allow use of snowmobiles, bicycles including electric bicycles, hunting, and use of trolling motors in areas in state parks which are currently closed to these activities.” We oppose these ill-advised proposals to increase access on public lands which in many cases are already over-crowded; and to increase motorized vehicle use on these lands; already there is a gross imbalance heavily favoring the use of motorized vehicles, to the detriment of both ecological values (see above) and those visitors seeking a quiet, natural, human-powered, non-motorized experience.
- Management of the public lands that seeks to increase access regardless of the effects on the resource and the quality of the visitor experience is irresponsible, and is certainly not good stewardship (a recent, and especially egregious example is the repeal of the jet ski prohibition in the Kachemak Bay Critical Habitat Area in spite of the belief by ADF&G biologists that the prohibition was still justified).
- All public lands have a carrying capacity, both ecological and social, a fact which the current administration seems to be ignoring. A number of Alaska State Parks units are already overcrowded, negatively impacting both the environment and the visitor experience--at a time when the division is already short of both funding and ranger personnel to manage the crowding. Access for even more people is not the answer.
- Similarly, State Parks has all too often developed facilities or other infrastructure that it does not have the resources to operate and maintain. Those resources are still lacking, yet over-development continues (for example, at South Fork Eagle River; and on the CSP Hillside, where an explosion of single-track trails has occurred). State Parks should have learned a lesson long ago, but doesn’t seem to have: Don’t encourage increased visitor use, and types of access (e.g., motorized) that often create significant problems and conflicts, when you don’t have either the funding or the rangers to manage that use.
- We oppose the use of e-bikes on trails where motorized use is not presently allowed. To state the obvious: e-bikes have motors; that’s the point of an e-bike. By definition they should be excluded from non-motorized trails. On motorized trails, e-bikes would presumably be far preferable to traditional gas-powered dirt bikes and ATVs, producing less noise, doing less damage, and creating fewer conflicts. But because of safety issues, noise conflicts, a potentially large and detrimental increase of recreationists, and the fact that they are motorized, e-bikes don’t belong on non-motorized trails.
- We are aware that the industry manufactures three types of e-bikes: pedal assisted, 20 mph maximum (Type 1); throttle only, 20 mph maximum (Type 2); and pedal assisted, 28 mph maximum, 17 years or older (Type 3). All three types are motor driven and all three types produce noise, a high-pitched whine that increases with speed. One of the problems with selectively allowing one type or another on public trails is from an enforcement perspective because it is difficult to tell these types apart without actually stopping the individual and inspecting their bike. Consequently, we do not believe State Parks should make a regulatory distinction among these types of e-bikes at this point in time. On non-motorized trails e-bikes of all types should be prohibited.

- The provision of conflict-free, high-quality human-powered recreation opportunities on the public lands becomes more important every day, and that is not going to change. As populations grow, and development continues, more and more of us will be seeking refuge in the outdoors from the increasing mechanization, motorization, noise and artificiality of our daily lives. Allowing e-bikes on non-motorized trails would be a substantial step backwards.
- Safety, and whether one feels safe when hiking, is another significant concern. Mountain bikers on traditional mountain bikes, if they're riding too fast around blind corners, can result in near, or actual, pedestrian/bike collisions. This is a problem especially, but not exclusively, for families with small children, and for the less mobile. Adding e-bikes to traditional mountain bike use increases the risk to hikers and decreases their ability to fully enjoy their hike without worrying about their or their family's safety.
- Another safety issue concerns bear/human encounters. A literature review for Parks Canada found that although intensity of use by mountain bikers was much less than for hikers on a trail in Banff NP, mountain bikers accounted for a disproportionately high incidence of conflicts with bears. The speed and relative silence of mountain bikes (and of course e-bikes as well, which can at this time reach top speeds of 20-28 mph) makes inadvertently surprising a bear more likely on a bike than on foot. Just outside of Glacier NP a ranger was fatally mauled by a grizzly bear when he collided with the bear while mountain biking. Adding e-bikes to non-motorized trails will only make this type of conflict more likely.
- Finally, we are concerned about what new—or existing—technology State Parks might decide to allow on non-motorized trails. One company has put pedals on an off-road motorcycle. This heavier bike with narrower tires could do significant trail damage. Might it, since it can be pedaled, be allowed on non-motorized trails? We would certainly hope not. And it's far from unreasonable to be concerned about the possible appearance of new types of motorized recreation vehicles: Who would ever have imagined that e-surfboards would be developed and become the next new thing?
- Similarly, e-bikes at this time are generally limited to speeds no greater than 20-28 mph and a range of 50-75 miles. This could change in the future. There is talk in the industry of speeds as high as 80mph and ranges as great as 245 miles. E-bikes with these capabilities would be totally inappropriate in Alaska State Parks.
- Please see the statement of AQRC's mission and goals at the beginning of this letter, and its general comments, in regard to snowmobiles, ORVs, electric trolling motors, and hunter access. More trails and areas open to snowmobiles and ATVs are certainly not warranted; more places closed to snowmobiles and ATVs are. We oppose regulations opening additional trails or areas to the use of snowmobiles and/or ATVs.
- For a number of reasons, electric trolling motors are preferable to gas powered motors. But that hardly means that they should be allowed on lakes where visitors presently have the rare opportunity to have a quiet, human-powered recreational experience free of reminders of their highly mechanized daily lives. We oppose the use of trolling motors on Tanaina Lake.
- Increasing hunter access by allowing more motorized access is a mistake. In many places, excessive motorized access has produced a less enjoyable hunting experience. It has also driven game farther into the backcountry, and made foot hunting (which a number of hunters prefer and are seeking) harder and harder to undertake successfully. We oppose regulations increasing motorized hunter access--and would ask whether ADF&G thinks this is a wise policy.
- We are very concerned with how drone use is affecting the public lands. All of the State of Alaska's land managing agencies—and certainly State Parks—should have regulations in place governing their use. Drones have become increasingly available and affordable, and their use has become "immensely popular and versatile" (Kealia Pond National Wildlife Refuge website). They are being used for both commercial and recreational purposes. A number of us have encountered drones flying over the public lands or other natural areas. Drones can of course have positive attributes, such as for search and rescue, fire look-

out, wildlife population counts, and certain types of photography. But they can also have significantly negative consequences, some of which we've documented below. We believe that drones should be prohibited (except perhaps as approved in writing by the land manager) in units of the Alaska State Park system (as well as in other special areas; on undesignated public lands, drones should be carefully and responsibly regulated in an enforceable manner).

- For the reasons described below AQRC believes that the use of drones in units of the State Park System should be prohibited:
 - Noise disturbance that degrades the natural soundscape
 - Disturbance and harassment of wildlife
 - Privacy issues
 - Causes conflicts between park users
 - Degrades quality of backcountry experience
 - Unethical for searching for game while hunting (even though ADF&G prohibits drone use for spotting game, it is difficult to enforce)
 - Already, large custom drones have been used to pull skiers and snowboarders across the snow, turning drone technology from an aerial platform into a vehicle
 - Drone technology is advancing very rapidly and it is impossible to anticipate just how they will be able to be used in the future and how their use will affect other park visitors and wildlife
- We specifically urge DNR to consider the breeding habitat needs of the 25 priority species listed in Table 1, when promoting activities that would significantly impact the CRB landscape. This includes activities such as wetland filling, extractive development, or recreational trail networks, which would further exacerbate habitat loss for the 25 species listed. Such activities may destroy key areas used by wetland-obligate species, fragment valuable breeding habitat via development of motorized trail networks, increase ambient noise levels, and result in alteration of microhabitats like wetlands or riparian areas.
- We also see unique management opportunities for the CRBAP to address those species with trends in bold in Table 1. In these situations, small amounts of management effort to conserve and manage bird breeding habitat could greatly reduce steep regional losses, or potentially conserve a national or regional species of concern that appears to be increasing rapidly in the CRB area, compared to the rest of the state.
- Finally, BPIF is also concerned about potential impacts of activity in the CRB area on one other species that is **not** part of Table 1, because it is too rare to be adequately assessed with BBS trend data. Timberline Sparrow (*Spizella breweri taverneri*), is a species with a very small and restricted breeding range in Alaska that is entirely within the Upper Copper River Basin area. This species has a convoluted taxonomic history, and was once considered a distinct species but it is now nested as a subspecies of Brewer's Sparrow (*Spizella breweri*). Although not much is known about this species, what little previous work has been done indicates it has strict habitat requirements of steep south facing slopes in the transition zone between subalpine and alpine with large continuous patches of willow and dwarf birch (Doyle 1997). Currently, Timberline Sparrows have only been documented in two localities in Alaska: the vicinity of Gold Hill (1460-1525m) and the Upper Cheslina River (1325m; Z. Pohlen, US Fish and Wildlife Service, *pers. comm.*). The four points below are within 1km of where every individual has been documented in the state of Alaska. It is likely some other localities host this species closer to the Yukon border, but they are very remote and have never been surveyed.
- SETTLEMENT:

- Wildlife habitat is an important priority, both for the sake of future generations of Alaskans and visitors and for the sake of wildlife itself. Selling and developing state lands are irreversible actions. Caution and prudence are required before making any decision to sell off state land that wildlife needs in order to thrive.
- Any residential land sales should be carefully considered and close to existing communities. The old plan called for more communities. It is better to locate land sales in or close to existing communities in order to keep existing schools open, have more opportunities for local businesses and jobs, and have more walkable communities. Currently, there is a lot of land on the private market. New subdivisions keep appearing and lots keep selling, but when there is a scarcity of affordable land for young people, some affordable state land should be made available.
- The Remote Cabin Sites sales program should be terminated. Although these sites have provided some Alaskans with relaxing getaways and a closer connection with nature, or with the opportunity to pursue a more self-sufficient lifestyle, access is almost always by some form of motorized transport—aircraft, motorized watercraft, snowmachines, or ATVs—all of which use the fossil fuels that spur climate change. They also reduce wildlife habitat, adversely impact wildlife behavior, and pose problems for wildfire response.
- Land sales should not impair public access to hunting and fishing areas; e.g., ridges that lead to sheep country, or rivers with salmon, or creeks with grayling.
- Residential land sales should have designated access roads which are delineated on suitable terrain and sustainable. Poorly-sited roads can do great damage to habitats, especially fish migration creeks and other wetlands.
- Land should be reserved for neighborhood and community trails and parks or greenbelts or open spaces. Well-planned, attractive, and livable communities have these features. Several years back, lack of a community decision about what to do with such land in in the Kenny Lake Subdivision prompted DNR to sell it. In the future, community-purpose land should be held for these important purposes until a community is ready to use it.
- Settlement areas should be at low risk for climate-change impacts, such as erosion and flooding.
- The first sentence of Goal 5 (page 2-24) should end with “especially renewable energy such as wind and solar.”
- In the second sentence of Land Allocation Summary (page 2-29), add “climate change” to impacts.
- Delete Klutina Lake Area from Settlement Areas (page 2-30). Klutina Lake is prime bear habitat and is well-used by bears. This makes it unsuitable for settlement.
- Land surrounding Tonsina Lake and the Tonsina Lake Trail (Unit 14) should not be settled because of its importance to hunters. This trail begins west of Richardson Highway Mile 74 and goes up the south side of the upper Tonsina River.
- REMOTE CABINS (by permit, not sale): It appears that this program may already have been terminated, but if not, it should be—for the same reason as Remote Cabin Sites by sale (above).
- TRAPPING CABINS: Trapping cabin permits should make clear that the permit does not provide a pathway to ownership and that the trapper has the responsibility to remove it when no longer in use; trapping cabins should not be permitted along non-motorized trails. Dogs—even those harnessed to a sled, leashed, or otherwise under close control—have been known to be caught in traps set directly on or very close to trails, and recreational users are hesitant to use the trails for that reason. (Please see our comments in “Transportation and Trails” on the importance of non-motorized trails.)
- AGRICULTURE AND GRAZING:
 - In Land Allocation Summary (page 2-7), retain the statement that “Large scale agricultural projects are not proposed.” In the South 48, large-scale agriculture has resulted in remote ownership that does not respond to community concerns about water and pollution, noise, and odor. Monocropping generally requires heavy doses of pesticides and inorganic fertilizers and

lack the wildlife benefits of edges that are found in smaller plots. Pesticides are a major factor in the loss of untold numbers of insects and almost 3 billion North American birds between 1970 and 2019. Birds and insects are vital parts of the food chain. Many native insect species are effective plant pollinators. Some large-scale projects in Alaska have failed to meet their goals and proved costly to the state.

- Agriculture land sales should be of various sizes (but not large-scale, as noted above) to promote local and regional self-sufficiency. COVID-19 has demonstrated the importance of having local food sources. All agricultural offerings should be suitable for crops that will grow well in our changing climate. (This is an example of where input from agronomists, hydrologists, and climate scientists would be valuable.) Like current agricultural offerings, they should have covenants to keep them agricultural. Some land with good soil should be small enough to be affordable to young people.
- Preventing transmission of disease to wild animals should be a grazing guideline.
- WATER RESOURCES (STREAMS, LAKES, WETLANDS, GROUND WATER)
 - Water availability should be known to be adequate before any land sales are offered. Quantity and quality of water needed for existing residences, farms, businesses, and wildlife—both now and as climate change intensifies—should not be impaired by new sales.
 - Water is actually a scarce resource in the Copper Basin. Many people haul water because they cannot afford to go deep enough for water or because water quality beneath their land is poor. They depend upon community wells, and at least one of those (Kenny Lake Fire Department well) had to ration one summer. Both those people who haul water and those who do have good wells are anxious to protect quality and quantity.
 - Wetlands should be avoided in designing settlement areas and access to them.
 - Willow Creek Watershed should be protected from development that would impair water quality and/or quantity. This includes Willow Creek, its network of tributaries, Willow Lake, and Pippin Lake. Settlement and agriculture land should not extend upstream of the present agricultural sales in Unit 19, because access would cross the many small feeder creeks. Likewise, land north of the Edgerton Highway in Unit 18 contains Willow Creek source lakes, tributaries, and Willow Creek itself. Willow Creek Water Consortium is doing scientific studies of the Willow Creek Watershed. Copper Country Alliance is a partner of the Consortium.
- FISH AND WILDLIFE:
 - Wildlife habitat is an important priority, both for the sake of future generations of Alaskans and visitors and for the sake of wildlife itself. Let's not rush to sell off state land that wildlife needs in order to thrive.
 - Wildlife scientists in all specialties are recognizing the need for climate change refugia for everything from insects to birds to mammals like the altitude-dependent pika. North facing slopes, which receive less sun and can hold snow longer are just one example of refugia. So are streams fed by cool groundwater. Refugia are badly needed. As we stated in the Agriculture Section, birds and insects are in decline. Climate change and other causes of habitat loss are believed to be two of the major factors (along with pesticides).
 - The Alaska Department of Fish and Game should be involved in this planning process. The final revised plan should be signed by the ADFG Commissioner, just as the original was. The revised Plan should be a document that ADFG biologists believe meets the needs of fish, wildlife, and their consumptive and non-consumptive users.
 - ADFG should re-visit wildlife ratings for each Unit. Biologists should look for new information about “Unrated” units and should re-consider whether any habitat still deserves a “C” (low) habitat rating. Notations beside the unit ratings suggest that

in 1986, ADFG concentrated on moose, caribou, bear, and trumpeter swans, with one mention of osprey and eagles. Small game and non-game species are important to healthy ecosystems, too.

- The first goal listed in Fish and Wildlife Habitat policies is too narrow, in that it does not recognize the value of wildlife habitat for maintaining healthy wildlife populations for their own good. We recommend that you delete “resources necessary to maintain or enhance public use and economic benefits.”
- There is strong scientific evidence that many different species of animals—not just waterfowl—are impacted by high levels of acoustical or visual disturbances. We request that you delete the word “waterfowl” from Fish and Wildlife Habitat Guideline B.
- In guidelines H-3 and H-4 of Fish and Wildlife Habitat, regarding loss of habitat productivity to land use activities, please add “or consider denying a permit.”
- Information that ADFG has gained over the past 35 years about anadromous and non-anadromous fish must be added for each Unit. Area fish benefit people from Anchorage to Fairbanks and points between, especially Copper Basin communities. They contribute importantly to the wildlife food chain. All anadromous salmon spawning areas must be protected.
- Eastern Denali Highway should be kept in the Planning Area. The highway viewshed should be closed to new mining claims. It should be recommended for inclusion in a future Tangle Lakes State Game Refuge for protection of the Nelchina caribou herd and continued opportunities for hunting (except that the Paxson Closed Area would remain closed to big game hunting). For more information on the importance of the region and the refuge proposal, please go to <https://www.savetanglelakes.org/>

- **TRANSPORTATION AND TRAILS**

- The Plan should specifically state that no new highways should be built within the planning area. Highway construction equipment fragments wildlife habitat. Scientists believe that wildlife needs more road-free land for unimpaired migration to areas better for them as the climate changes. The state should take carbon emissions into consideration for any industrial development or roads.
- A road link to Cordova (the old Copper River Highway idea) should be removed from the plan.
- Balance is needed between motorized and non-motorized uses of the land. Other than the Tangle Lakes Archaeological District (TLAD) and certain ADFG Controlled Use Areas, no state lands in the Area have restrictions on ATV travel. Even in the TLAD, there are a number of designated motorized trails. In ADFG Controlled Use Areas, where ATVs cannot be used for hunting, they still be used for non-hunting purposes. With the exception of the Rusty Lake Trail (which has gone unrepaired for years and is basically unusable) we know of no designated non-motorized trails on state land in the Planning Area. (As stated above, all of the Eastern Denali Highway should be included in the Copper River Basin Area Plan.)
- Uncontrolled recreational motorized travel on land and water in all seasons, and the more diverse and powerful equipment for doing so, means more fossil fuel use at a time when we should be cutting back on climate-changing emissions.
- The COVID-19 pandemic has illustrated the need for trails within and near settlements. Being able to walk, run, ski, and snowshoe near home was an important “sanity saver” for many people. It was also a safe way to meet up with friends. We could use more walking trails. Using trails near home rather than having to drive long distances to them is a way to reduce vehicle use and enhance the quality of life.
- Providing walking trails and encouraging their use is a way to combat the serious obesity problem in this country.
- Visitors from foreign countries, the South 48, and Alaskan communities like Anchorage enjoy having the option of taking non-motorized trails. Many people seek quiet outdoors experiences and deserve some good opportunities for their preferred recreation.

- The tradition of hunting on foot, which many Alaskans used to enjoy and take pride in, is being lost. Even in those places, like the Tonsina Controlled Use Area, where motorized access for hunting is disallowed, recreational users can and do use OHVs, which can lessen hunters' enjoyment and success.
- Non-motorized trails are much cheaper and easier to build and maintain than motorized trails. Some Copper Country Alliance members make a habit of maintaining a few trails that see little motorized use. We believe that if some areas were designated non-motorized, an organization could be formed to build and maintain non-motorized trails.
- The Plan should identify and designate non-motorized areas or trails. It should note suitability for non-motorized uses in the "resource information summary" for each unit. It should also make non-motorized areas and trails a goal.
- The Plan should recommend means to identify public trails which have or should have trap-free corridors and/or which control the use, means, and location of traps along those public corridors.
- We suggest that the following areas and trails are suitable for non-motorized designation or recommendation:
 - o Tielkel River downstream of the Richardson Highway
 - o A portion of the Thompson Pass area, at the north end, for both back-country skiing and hiking
 - o Mile 62 Richardson Highway to Kimball Pass via telegraph route.
 - o Perhaps another route or area within the Tonsina Controlled Use Area, which is already closed for motorized hunting from late July through September
 - o A route on any state land along the north bluff of the Tonsina River, from the Richardson Highway bridge to the Edgerton Highway bridge
 - o Mile 12.5 Denali Highway trail on the north side of the highway
 - o South side of Denali Highway mile 3 to 4 within the Paxson Closed Area
 - o Some non-motorized routes or trails in the Nelchina Public Use Area
- RECREATION, CULTURAL, AND SCENIC RESOURCES:
 - In Goals (page 2-18) substitute "communities and neighborhoods for "population centers" and delete "major" from "major transportation routes." As stated in the Transportation and Trails section, being able to recreate close to home is essential.
 - Maintained outhouses are a necessity for encouraging a tourism industry that will be a source of local businesses and jobs. In recent years, the State has failed to provide and/or maintain adequate outhouse facilities. This is also a health issue, as human feces abound near highways and trailheads when outhouses are closed.
 - The Eastern Denali Highway and Klutina Lake should remain public because of their heavy use by fishers, hunters, and recreationists. Add both of them to Recommended Legislative Designations (page 2-21).
 - Fire hazard should be among the concerns for Public Use Cabins and Private Recreational Facilities on Public Lands. Human-caused wildfires constitute the majority of forest fires in the Copper River Basin, and climate change is already increasing the frequency of wildfires.
 - As discussed under our "Transportation and Trails" heading, more balance is needed between motorized and non-motorized access.
- FORESTRY
 - A mechanism is needed for the State, BLM, Ahtna, and Chitina Native Corp. to collaboratively keep track of the cumulative forest acres involved in planned and projected forestry projects (logging, commercial and home firewood, and biomass) on all Copper Basin lands. This is important for keeping the take sustainable and avoiding unwanted impacts to other uses and to wildlife.

- In Goals (page 2-13), recognize the importance of forests in capturing carbon.
- Likewise, in Land Allocation Summary (page 2-14), add “carbon capture” to major uses of forest land.
- Please add a Guideline (page 2-13) for protection of viewsheds and trails when harvest areas are laid out.
- **SUBSURFACE RESOURCES**
 - Oil and gas exploration and development should not be allowed. Fossil fuels are the major drivers of already-disastrous climate change and are not the fuels of the future. Seismic lines, new access roads, and pipelines break up habitat for our important wildlife. Oil pipelines pose risks to our important salmon.
 - Mineral development should be the exception, not the rule, in allowed uses on various land blocks. Large-scale mining, both placer and hardrock, impairs fish and wildlife habitat. ADFG should play a significant role in determining which units or subunits are unsuitable for mineral entry. If an area is too large for DNR to close to mineral entry through this plan, the plan should list it as unsuitable and make the recommendation that it be closed.
 - In Goals (page 2-31) reference to subsidization through infrastructure or other means should be deleted.
 - Guideline B (page 2-31) should say that any appropriate mineral exploration should be “permitted” (not “encouraged”) under lease and be properly sited.
 - Where mineral entry is allowed, leasehold locations rather than mining claims should be required. According to the DNR website (Mineral Property Records page), “State lands are designated for leasehold location only if there may be other valuable resources present or if the surface has already been leased or sold for other uses.” We sincerely believe that all undeveloped state lands have “other valuable resources,” such as wildlife (including nongame and small game), plants, clean air, and clean water.
 - Phase out Gold Placer Mining as an allowable use of state land. Placer mining and associated roads and trails are destructive of the landscape; waters suffer from siltation. Zone more areas closed to mineral entry; phase out unsuitable areas now in use.
 - Mineral development should not be an allowed use within sight or sound of scenic highways. Keeping our highways scenic is important to Alaska’s growing tourist industry and to Alaskan travelers. Mineral guideline F should be strengthened.
 - The Denali Highway viewshed within Unit 28 is an example of an area unsuitable for mineral entry. Subjecting Unit 28’s important wildlife habitat and popular hunting, recreation, and sight-seeing area to further mineral exploration activities would be a poor choice.
- **MATERIALS:** Please see our “Invasive Species” section.
- **BOUNDARY ADJUSTMENTS:**
 - Eastern Denali Highway should be kept in the Planning Area. The highway viewshed should be closed to new mining claims. It should be recommended for inclusion in a future Tangle Lakes State Game Refuge for protection of the Nelchina caribou herd and continued opportunities for hunting (except that the Paxson Closed Area would remain closed to big game hunting).
 - We support the Planners’ 2016 ideas for expanding the Area boundary near Lake Louise, and also extending the southern boundary west to include Thompson Pass.
- **NVASIVE SPECIES:**
 - The potential for spreading invasive species of plants should be a consideration in framing all goals and policies. Currently, contaminated gravel pits and road corridors are the big drivers of the spread of invasives such as white sweet clover. Airplanes and watercraft spread lake-choking Elodea. Require accepted invasive species Best Management Practices for all state operations.

- The key issues regarding the Copper Basin land management policies that we are concerned with are intact fish spawning and rearing habitat, trail system and recreational overuse, and mineral exploration and entry within the watershed. Further, CDFU requests inclusion in further discussions with DNR regarding the Copper River Basin, as our stakeholder members are significantly impacted by upriver decisions.
- Recreational abuses along the Copper River during the summer dipnet season, particularly between the O'Brien Creek and Haley Creek section near Chitina have left damage and destruction, litter, and human waste in sensitive habitat areas, and we have concerns regarding how left-behind debris and riverbank damage may impact the future salmon runs within the Copper River Watershed. ATVs, including 4 wheeler and 6 wheeler traffic in spawning areas have led to further degradation, and should be planned for appropriately moving forward.
- Additionally, given the significant impacts to spawning habitat and river channels that can be caused by beavers, we support a higher priority placed on maintaining comprehensive trapping access within the area, particularly surrounding primary tributaries within the Copper River system. In particular, the area surrounding Sinona Creek near Chistochina, as it is a major spawning area for Chinook salmon.
- We support identifying state lands appropriate for either primary or co-designation as Forestry due to local interest in utilizing biomass, timber, and firewood, and potential export markets.
- We support including consideration of a future Copper River State Forest into the draft. Our first comment is actually a question: Who or what primarily made the decision, and when, regarding what communities and region would delineate the Copper River Basin water district for the CRBAP? How was that decision made? Was it based on geography, watershed delineation, recoverable resource potential? Possibly some ecosystem considerations? A historical answer to this is expected. Also, reasons why it was decided that Cordova should be in the Prince William Sound water district, and not the Copper River water district. Thank you.
- The Eyak Preservation Council (EPC), based in Cordova, is impacted, along with Cordova and the entire community in every way and definition, culturally, economically, financially, subsistence-wise, tourism, recreation, lifestyle - by the Copper River Delta (basin) watershed. For the community of Cordova to not be included in the Copper River water district is in error regarding every one of the points mentioned in the previous sentence.
- EPC is firmly requesting that the DNR, and the public, take a serious regenerative economic and scientific review of the current geographic delineations of the Copper River and Prince William Sound water districts from a not only a resource but an ecosystem perspective. EPC recommends including Cordova into the Copper River water district, and, changing the CRBAP map. (An example is A. on page 3, courtesy of the CRWP). Cordova is in an unusual geographic position. The Prince William Sound and the Copper River watershed/estuary meet and intertwine in the Gulf of Alaska. These monumental water systems are interconnected, and the life systems and all of the surrounding Alaska communities in Southcentral Alaska depend of the regenerative health of these water systems, that are also termed, Districts.
- EPC' also wishes to comment and request that the Department of Natural Resources acknowledges that in the last 35 years the impacts and acceleration of climate change is a fact that must be included in considerations for all development considerations and plans.
- The DNR's mission is: "Develop, conserve and maximize the use of Alaska's natural resources consistent with the public interest." Possibly EPC must ask for forbearance in the current mission in these times of drastic climatic change, that DNR might consider what is best for not only the consistent public interest, but also to seriously include and consider the best consistent interest of future generations, translated as not short term financial yearly gains. The DNR Divisions are primarily

based on the financial gain of resource development, stated so for the public. In the Copper River Basin, the regenerative sensitivity of the watershed MUST be included from a scientific and ecosystem perspective. This perspective is omitted verbally almost entirely in all the DNR Division descriptions. There are several untapped natural resources in Alaska that are being overlooked that could well help the public interests and the state of Alaska financially with focus, consideration and investment. These would have far-reaching and exciting consequences. To utilize Alaska's powerful sun, wind and tides for the generation of electric power could provide a statewide and nationwide leadership opportunity for creative yet financially solvent development opportunities. These abundant Alaskan natural resources are waiting to be developed.

- Most importantly, understand that Thompson Pass is an enchanted wonderland for everyone, not just for the outdoor enthusiasts who consider it a “hallowed ground”. TP has transformed countless lives. It has mended intergenerational trauma, circumnavigated suicide, cleaned up a drug dealer, transformed a felon, nourished a new mother etc. The power of Thompson Pass is undeniable, sacred. The state knew its value as far back as 1970 when it funded a nearly 100-page study encouraging it’s protection with a “scenic park” for “present and future generations”. This land is the renewable asset capable of sustaining the physical, emotional and economic health of Valdez. And it has no computer to submit an online comment. So I will commence by sharing decades of perspective on the irrelevancy of both the CRBAP (I’ve had my own copy since pre-fax machines) and public input in Thompson Pass.
- First clue, we are discussing a plan, the CRBAP, that states in its opening summary, “the plan will be reviewed every 5 years to determine if revisions are required (1-3).” It has never been revised in the 35 years since its inception. Each time was going to be “the time” that changes would be made. Each time, DNR went through the expense not only to drop the ball but to have lost the ball. According to Kevin Husa, the project manager who was heading up the summer public meetings (I imagine that nearly a week’s worth of travel expenses for three folks were substantial) that were barely attended (because folks have given up?), DNR has no previous comments with exception of the last round of comments that were submitted online. Perhaps they were vaporized like the big million-year-old release off of 27 1/2-mile glacier that I witnessed last week; it lingered just long enough for me to feel the nasal sting; as sensory tattoo. Last round, a handful of years ago, I submitted my comments via snail mail. I will electronically submit this round hoping that DNR doesn’t catch a digital vaporization virus. This round I will skip the minutia that mattered to me the last few rounds and address a wider more compelling perspective. Like, what is the point? I ask not out of resignation but out of hope that the three new folks – Kevin, Shawana and Jacoby might shed new light on a nagging issue. There is an advantage to not being so enmeshed. I hope that by connecting some dots I can inspire the three of you to find a “third way” that I cannot yet see.
- I met you at the Kenny Lake meeting this summer (because I was on the Copper River the day of the Valdez meeting). You were amiable and genuine. But, to no fault of your own, you were also sadly a stark metaphor for a broken system. I asked Kevin Husa, the CRBAP project manager, if he had noticed the eyesore in clear view from the Richardson Highway, the collapsed building on the DNR permit site at the bottom of Thompson Pass. He saw it. “Wish I would have known, we would have stopped”. I explained that the permittee, Dave Geis of AK Snowboard Guides, is essentially squatting on the property. He has not paid his permit fees, user fees, insurance etc. I then asked Kevin if he noticed (also visible from the highway) the school bus at the Thompson Pass airstrip with garbage hanging out the window, power cords running to the generator, a wire running to the Copper Valley Telephone service stub, fuel and other miscellaneous junk scattered about; priceless roadside real estate. He noticed.
- I explained that was a DNR permit site and that Dustin James AKA Dustin Huebner AKA the new face of Tailgate AK, had been living there over 3 months since his permit expired (about 4 months in total) without an outhouse, also squatting. Kevin

said again, “Wish I would have known, we would have stopped”. 2 examples should be sufficient to conclude the metaphor. Here you are, the DNR folks tasked with rewriting the management plan and yet you have no clue, no connectivity to the management area even when driving right through it. I attempted to respectfully share my frustration with the blatant disconnect at the meeting. Clearly the system is broken. Your intentions seemed earnest. Certainly the turnover and reshuffling practices of DNR contribute to the “disconnect”. How can we hyper-focus on dotting the CRBAP’s “i’s” when DNR has proven, time and time again, that they (the 3 of you are becoming “they” because you have not been a part of what I will be addressing moving forward) do not even see the letters, let alone the words, in the management plan. You are tasked with remedying a colossal conundrum. And perhaps I can help pack your toolbox. I propose that remedying the disconnect should proceed dotting the “i’s” that DNR cannot see (wink).

- Thompson Pass’s management logistics (severely abbreviated) are important to understand, particularly for the folks who are charged with revising its management plan (who do not have any knowledge of the area and it’s unfortunate management history). The 1986 Copper River Basin Area Plan, CRBAP, which is in the process of being updated, “describes how DNR will manage state land in the Copper River Basin”. The plan summary for Thompson Pass states that the lands should be “actively managed for recreation”. The plan recommends that DMLW enter into a cooperative management agreement with Dept. of Parks and Outdoor Recreation, DPOR; and that a citizen’s advisory board be formed to “propose management”. There is no funding available (and never has been) to implement the agreement or the management. Not only will there be no management, but the land is also not regulated. Thompson Pass is even excluded from DMLW’s 8/11 Fact Sheet “Generally Allowed Use on State Lands”. A State Park Citizen’s Advisory Board was originally formed in the mid-nineties to no avail. Both the original and the most recent board, now several years ago, became inactive. The members were ready, willing and able to serve. But DNR’s bylaws require that the state organize, staff and record the monthly meetings. And DPOR has failed to meet their obligations. The board was notified that it will no longer be supported. Valdez was “abandoned” due to budget cuts. A concerned board member reached out to John Hozey, a deputy Chief of Staff to AK’s (then) governor Bill Walker. Hozey apologized, “Sorry, wish we could do more, but it’s getting pretty ugly everywhere.” Nonetheless, all iterations of the board shared disillusionment induced by DMLW’s deaf ear. The board always attempted to communicate to DMLW that, time and time again, all Valdez user groups have been unanimously and adamantly against ANY commercial development in the Thompson Pass corridor (recordings available). The Valdez high school students gathered the majority of their peer’s signatures on a petition that stated, “Commercial development is not appropriate for this area.” The student who presented the petition addressed DNR “I am a 16-year-old junior at the Valdez High School. The future of Alaska does not want to see Thompson Pass developed.” There is only one other DNR document, besides the CRBAP, stipulating TP’s management . The Thompson Pass Special Use Area, TPSUA, designation was created in 1994 in response to growing winter tourism. Its purpose was to protect TP’s recreational resource value. The requirement of event/operator permits is, thus far, the only public stipulation. Still, DMLW has not required Tailgate Alaska to permit their competitions. In fact, DMLW is out of compliance with all of their obligations set forth in the TPSUA. For Example, “. . . at minimum an annual meeting should be held to ensure communication between the users and the agency is maintained.” There has been only a few meeting since the 1994 (or the 1986 CRABAP) designation and they had nothing to do with the TPSUA designation.
- The most recent outrageous and downright tragic example of DNR’s disrespect of Thompson Pass came directly from the commissioner herself. DNR Commissioner Corey Feige pressured the DNR staff to conditionally relinquish its’ State selected land (specifically contingent on a transfer to the Chugach AK Corporation) at the Thompson Pass hairpin turn. Feige took the DNR staff by surprise. From: Stolpe, Adrienne K (DNR) on 12/7/20 Sent: Monday, December 7, 2020 To: Pinckney, Charles A

(DNR) ,Hamner, Lacy C (DNR) Subject: RE: East AK RMP Amendment “As far as I am aware, we have no plans of relinquishing any selections in the area.” Same day, Chuck (Charles) replies, “really just need to know if we had promised anything to them regarding our selections.” Same day, Adrienne replies, “As far as I’m aware, absolutely not. We’ve received pressure to relinquish lands for years and always push back. Unless something was promised higher up, which I doubt, I’d operate under no promise to relinquish (Attachment DNR Research, p.77)”. Next communication in the file was from politically appointed Commissioner Feige pushing forward the land exchange in a 1/27/20 letter addressed to DNR’s Deputy Commissioner and to both the Director and Deputy Director of the Division of Mining, Land and Water. The letter included an attached draft land exchange contract prepared by the corporation and Commissioner Feige stated, “Please look at the parcel and determine what would need to be done to lift the state selection . . . Thank you very much for your work on this”. (Attachment: DNR Research p.28). The public was not notified or invited to comment. Interesting, eh?, what happens when a private corporation who is currently exploring metal mining in 5 areas in the Chugach region (<https://www.miningnewsnorth.com/story/2019/12/01/in-depth/purpose-tradition-guide-chugach-alaska/6080.html>) reaches out to DNR’s politically appointed Commissioner Corrie Feige who (not so incidentally) has had an oil, gas and mining consultation firm with her husband for the past couple decades. Feige was setting the enabling wheels in motion to allow for an exchange of Thompson Pass’s most widely used winter recreation land for partially glaciated totally inaccessible mountain top land in the middle of the Wrangells . Worth noting, , “land exchanges must be in the public interest”. (43 U.S.C. §1716(a)).

- Against both the CRBAP and the TPSUA, the commissioner conditionally relinquished prime public recreation land [PHOTO]. The CRBAP’s first line under TP “Management Intent” reads, “ The management Unit should be retained in state ownership and managed for multiple use with emphasis on expanding recreation opportunities (3-103).” It continues by suggesting a legislative designation for mineral closure. In TP “the potential for conflict between minerals and other resources is high. The relative values of fish habitat or recreation (at these specific sites) are higher than potential mineral values and therefore warrant a closure (A-4). And the TPSUA states that “Adoption of a special use designation will serve to focus attention on affected state lands for their unique winter recreation values. Winter time use of the area will be reviewed and monitored by the Division of Land staff to better evaluate the need for more active management. Annual public meetings should be held to provide the public opportunity to comment on existing uses and to participate in future management actions (p.3)”. Commissioner Feige also overlooked the Special Use Designation statement indicating, “Any changes or modifications to the special use area will be subject to public review and comment (p.3)” before she signed over our prime public recreation land to make it available to a private corporation. What is the point of having plans and designations if DNR is not accountable to their guiding doctrines?
- The “hairpin” zone is the most used ski area in the TP corridor for multiple reasons. It offers the only reasonably accessible south-facing terrain in the corridor. And because of its south aspect, it actually receives a bit of warmth in deep winter when temperatures are plummeting below zero. And when folks get off work and want to squeeze in a run in the last of the light, the hairpin is their “go-to”. It is often protected when the rest of the corridor is being blasted by nuclear north winds. It offers the most family accessible ski area in the corridor. The lower angle terrain is both less intimidating and diminishes (not deletes!) the likelihood of avalanches. It is available to a wide range of ability levels because there are no crevasses or massive cliffs. There is no more user-friendly terrain than the “hairpin” in the Thompson Pass corridor.
- It was an unlikely fluke that I caught wind, moments before the BLM deadline, of this ludicrous situation. And when I got word out, in a matter days, mostly between this last Christmas Eve and the day after New Year’s, 143 folks (one representing

6,000 voices, another 10,000 and another 160,000) overwhelmingly sent comments to BLM (because the state had already signed the relinquishment), “Not this land!”. Hunters, defenders of wildlife, motorheads and self-propelled recreationalist all stood on the same ground. “Do not give our public land to a private corporation!”. For a more detailed explanation of this example: <https://drive.google.com/file/d/1jGR5CeVHJ0eK6tE8kunpYsx9d9Vrg6dL/view?usp=sharing>

- Both DNR’s DMLW and most of its Thompson Pass permittees have histories of gross negligence in regards to compliance with their requisite guidelines. Examples of out of compliance permittees abound. Tailgate AK operated on state land without having any permit or business license for its first 4 years. Another Thompson Pass DMLW permit area, named the “superfund site” by Alyeska Pipeline’s fire chief, the old Valdez Heli-Camps/VHC base, was a disaster for decades. A persistent stream of hydraulic fluid ran from the permit base across the Lowe River and to the top of Stone Mountain. They also built an illegal overnight cabin on Stone Mt. It took several years of my perseverance before the abandoned site’s leaking diesel tanks, a leaking jet fuel truck, old truck batteries and collapsed, cracked-open Atco’s were superficially cleaned up. DNR did not red-flag Matt White. Instead DMLW traded our Worthington Glacier state recreation site for inland contaminated Kodiak property so the Matt White, the superfund site provocateur, could build a private lodge. Local adamant opposition was ignored (recording available). After an exhaustive year, in a last-ditch effort, I gave the Kodiak Native Corporation a pile of paperwork which included numerous lawsuits against White, the same paperwork that I had distributed generously throughout DNR and Juneau, and they withdrew their backing. The project failed to materialize without financing.
- And then DMLW emailed only heli operators to notify them that the land was available, hardly a public process. And AK Snowboard Guides now squats the same property with a different collapsed building (mentioned previously in the introduction).It’s a sad never ending story. I could write a lengthy document solely on close-calls barely circumnavigated. Dean Cummings was awarded the right to close off public access at the “hairpin”. But he kindly reversed his intention after reading a letter that I wrote. I barely intercepted DNR from giving another operator Deserted glacier where connexes etc. would have decorated the awe-inspiring view driving southbound over the Thompson Pass summit. Kevin, Shawan and Jacoby, I sure look forward to any ideas that might take the pressure off me (and TP!).DMLW’s gross negligence enables its permittees gross negligence. Sadly even the word of DNR’s commissioner can have no influence, no credibility. On 9/12/07 Thomas Irwin, the (then) DNR Commissioner, wrote in an appeal response that a connex was to be removed from the TP airstrip. Irwin referenced the CRBAP, “The relevant management guideline says that all development along the Richardson Highway Corridor should be sited and designed to minimize impacts on views from the highway . . .”. Irwin continues describing allowable seasonal structures . . . “All structures will be wood-sided with brown roofs . . .”. 14 years later the old connex still clutters the Worthington Glacier viewshed. And several years ago another connex grew next to it like an invasive weed. And the access to the DNR’s “crown-jewel’s” parking is littered with 30 ragged signs about money. There are not even 30 parking spots. Truly a depressing welcome to a breathtaking place, the Worthington Glacier. Another Thompson Pass DNR Land Use Permit stated, "Removal or destruction of the vegetative mat is not authorized under this permit." Nonetheless, the property was bulldozed (as seen above). The permit allowed for one cabin. 7 cabins were put on the property. And then the same operator was awarded 2 more permits.
- The growing eyesores have been authorized for 7-8 months on five-year permits with only 10 – 30 claimed user days annually. Permit application numbers indicate that one tour bus will potentially be more impacted by the eyesore (of a single permit site) than the total number of the permittee’s annual clients. DMLW is aware of the blatant misrepresentation of daily user numbers by heli-operators. There are several Thompson Pass permits that have been issued and never used. Operators buy up permits to keep others away. While I was in Juneau attending a Senate Resource Committee meeting, a resident from

the north side of Thompson Pass phoned in to emphasize the quackery of DNR's permitting. He was referencing a recent "free and easy" local permit, "the accepted DNR application literally looked like it was filled out and compiled by a third-grader" (SENATE RES COMMITTEE -33- March 14, 2014). TP area permits are given out like candy on Halloween. When hundreds of folks wrote comments (see Addendum 1/17 Public Tailgate Comments Annotated) to DNR in 2017 to protest Tailgate Alaska's TP permit, DNR awarded Tailgate a bigger better permit with 2 more weeks and an unlimited number of participants. It also included an unrestricted number of snowmachines, helicopters and airplanes. DMLW essentially gave Sullivan the right to own Thompson Pass' PEAK recreational and commercial user season for a month and a half-long "10-day event". For a mere \$500 annual DNR DMLW lease fee Mark Charles Sullivan's limited liability company "Tailgate Alaska" had been purchasing the right to monopolize Alaska's most PRIME winter tourism real estate. The winter alpine access is unmatched in the entire world. This, by the way, also happens to be in the foreground of Valdez and the Copper River Basin's most visited tourist site and Alaska's most accessible glacier. The Worthington Glacier is described on DNR's website as a "crown jewel" of the Alaska State Park system. A bargain indeed I sent DNR's Cliff Larson the below TP photo early April 2021 (of hot tubs and open fuel in a fish and mammal bearing stream that feeds into the Copper River) twice asking the same question, "Who is the contact responsible for protecting State waterways that contain fish and mammals?" I was never provided a contact. The hot tub continues to be in the same river every spring.

- DMLW has the authority to issue permits/leases but has no designated people or plan to manage them. They are not only grossly imposing upon other, already strapped, state agencies (especially Department of Transportation and the Division of State Troopers) but they are also imposing upon the public. DMLW is enabling the decimation of their citizen's favorite "destination" and their potential winter tourism dollars.
- DMLW has been enabling disrespect for Thompson Pass and its users for decades. Incomplete permits are issued, fees go uncollected, oversight is unseen, spills and other public concerns go unaddressed. DMLW is clearly not poised contractually or functionally to take on ANYTHING in TP. Again, the system is broken. What is the point of spending time and energy rewriting a document that has been incessantly ignored? Why should hundreds of locals and tourists a day be burdened with an eyesore on their public land (on the account of DNR's incompetency)? I propose DNR start by investing its energy into resolving the messes it has already enabled. And then? I propose DNR call an "All Systems Stop!". The state must stop issuing permits that they have no ability to enforce. It's like having a baby and leaving him/her/they in the street and walking away. Don't go there if you don't care and/or don't have the resources. The state is grossly out of compliance on the existing plan. Perhaps the public has a revolutionary idea for how to manage the TP corridor? Wouldn't it be lovely if Thompson Pass could be a model in management for the many other areas that are also feeling the squeeze of dwindling state resources? Setting an example is far more enticing than being a whipping post poster child. Hundreds of folks, from both Alaska and across the globe, have written to DNR about how they avoid, both personally and professionally, Thompson Pass. In the care of DNR, TP has evolved from arguably the most pristine paradise on the American road system to, according to one public comment (see addendum), "a shitshow (sic)". Yes, we need change. But is another false start to a plan that has no bearing in reality going to initiate the change? Apparently I am not capable of giving up hope. But I am asking for both the public and DNR to get creative before it is too late. It is heartbreaking to watch DNR sabotage TP's recreation potential.
- DNR's habitual negligence clearly indicates a need for more oversight not less. Failure should not be rewarded with the issuance of more authority. After 3 decades of listening to both tourists and locals, I am certain that it is the endangered unspoiled vastness more than any single activity that draws folks to this area. Nestled between Thompson Pass and Prince William Sound, Valdez has the opportunity not only to become Alaska's recreation hub but to become North America's

recreation hub. The Valdez gold rush went bust. The oil will eventually run dry. And even the fishing has, at times, become more . . . well . . . like fishing. But thankfully Americans spend \$788 billion annually on outdoor recreation. Thompson Pass, if responsibly managed, is THE precious renewable resource, the ASSET, capable of sustaining Valdez's long-term health and economy. It is poor public policy to give up unique-in-all-the-world public land for private profit (and perhaps pillage?) particularly with the public investment hat has gone into this area, this enchanted place that can't be reduced to words or pictures.

- We are interested in landscape level planning and this 15.9-million-acre area provides a huge opportunity to consider large-scale conservation planning. As the State develops the draft CRBAP, the Service is happy to be involved to the level appropriate. Based on a review of the 1986 CRBAP, we identified opportunities to update the threatened and endangered species section, craft management goals for invasive species in the area (invasive species are not mentioned in the existing plan), conserve migratory bird and fish habitat, and more.
- My concerns regarding the Copper River Basin Area Plan center especially on the continuing vitality and ecological health of the Willow Creek watershed. Willow Creek flows from just south of Copper Center southeasterly to the Richardson Highway, then between the Old Edgerton Highway and the Edgerton Highway. The creek crosses the Edgerton Highway immediately east of Kenny Lake School. From there it continues meandering southeasterly until it empties into the Tonsina River.
- Land owners along the course of Willow Creek include Ahtna Native Corporation, Chitina Native Corporation, the Copper River School District, a number of private owners — including the Wellwood Nature Preserve with which I am associated — and the State of Alaska. The State of Alaska owns large portions of land around the source of Willow Creek, and most of the land south of Kenny Lake School and Wellwood Nature Preserve downstream toward the mouth of the creek. In my role as coordinator of the Willow Creek Research Project I have been involved in the systematic measurement and recording of such parameters as volumetric flow, water temperature, and conductivity. Ground temperatures have been measured at depths down to 2 meters, and some monitoring was begun of groundwater resources, using a number of local wells. The focus has been on factors that affect the quantity and quality of water, both surface and subsurface.
- Willow Creek, though it's watershed extends over 100 square miles, is a relatively small stream, reflecting the overall low rate of precipitation in the region. Unlike the major rivers nearby, Willow Creek does not receive water from snowfields or glaciers; its flow is completely dependent upon local precipitation. In its downstream portions, south of the Edgerton Highway, some of its flow goes underground into porous substrate. During dry periods, this may deplete the surface flow entirely, resulting in the death of commercially valuable salmon fry and other aquatic species. I believe this intermittent character calls for great care that the present sources of water are not compromised. Upstream, the headwaters of Willow Creek comprise multiple small channels. These channels converge into a single channel before the Creek crosses the Richardson Highway. Through much of its course, Willow Creek flows through marshy terrain. Beaver dams play a large defining role in the hydrologic characteristics of this region — as moderators of flow, as reservoirs of water during dry seasons, as habitat for grayling and young salmon (silver and king), and as oases for wildlife. The periodic flooding caused by the dams also serves to restart the cycle of ecological succession, renewing habitat for browsers and grazers such as moose and snowshoe hares. Willow Lake and Pippin Lake are the two largest water reservoirs in the Willow Creek watershed. While research data is not yet complete, it appears likely that these two lakes are important in supplying water to underground aquifers on which local wells depend. Of critical concern is the upstream region of Willow Creek, where flow in the multiple streams and small channels would be easily disrupted by human activity, especially the building of access roads and lanes. Our measurements show that this is a region of permafrost, with frozen ground existing year-round at a depth of about 1 meter at our monitoring station. This

permafrost, by forming an impermeable barrier, likely plays a very significant role in maintaining surface water and flow in the upstream channels, which feed all lower portions of the creek. The clearing of forest, essential to human development, could result in the melting of this permafrost, causing disruption and reduction of flow. Because of this, I urge that this upstream region of the Willow Creek watershed — whose northern border is the southern edge of the Klutina River gorge, and which extends southeastward to the Richardson Highway — be set aside, reserved from human alteration. It seems far preferable to prevent problems before they occur, rather than try to correct them through regulation and oversight after-the-fact, or suffer the loss or degradation of the Willow Creek watershed for future generations.

- Second, I would also like to comment on the area to the south of Kenny Lake School, where a longused trail follows the north bluff above the Tonsina River. This trail has traditionally been utilized and enjoyed by local Kenny Lake residents and others — for hiking, hunting, for skiing in the winter, and other recreational, educational, and subsistence activities. This trail, which roughly follows south of Willow Creek and leads ultimately to the mouth of the creek, should be maintained as is, without issues of private ownership affecting access, or built structures interfering with the magnificent views. Some benches and interpretive signs have been placed at two locations along this trail. This was done a number of years ago through a public project, for the benefit of students at Kenny Lake School and others. Wellwood Nature Preserve, which includes a camp area and a trail system, borders this area. The area has been utilized since 2007 for nature tours sponsored by Wrangell Institute for Science and Environment. Tourists, from in-state as well as out-of-state, have found these trails to be a powerful incentive to come to this area and appreciate the natural beauty that is its greatest asset. I strongly urge that this Tonsina Bluff Trail be kept in a natural state, available for the use and enjoyment of future generations, as it has been for generations of the past.

Input Received in Discussions:

Thompson Pass Specific Comments

Motorized use

- Designate non-motorized area within Thompson Pass
- Important for safety (snowmachine vs skier, etc), avalanche triggers
- Accommodate the non-motorized user group in this plan by designating separate use areas
- Support setting aside a non-motorized area in the name of safety, as well as supporting those who want to be able to quickly escape to quiet for a few hours
- Snowmachine and helicopter use adversely impacts the recreation experience sought by many nonmotorized users and will displace nonmotorized use where use is heavy
- Impacts to nonmotorized recreationists involve noise, exhaust, consumption of powder snow, and safety
- Noise from motorized use in winter is one of the biggest conflicts with nonmotorized users due to confinement to plowed access points
- Backcountry use needs to be zoned to provide an area for nonmotorized recreational use to occur
- Snowmachines should still be allowed to operate in all areas of the pass
- Area needs prescriptions that are consistent and coordinated with surrounding land managers and provide for a diversity of recreational experiences (non-motorized and motorized) through a more specific plan
- Keep motorized use a priority for the recreation plans in the future for Thompson Pass
- Need some regulations for a non-motorized area and should be a priority to get a management plan or regulations

Other Input

- Turn entire Thomson Pass Special Use Area into a park
- Additional facilities (trailheads, trails, parking areas, boat launch areas and signage) are needed
- Behavior of people recreating in the pass needs to change to respectful and responsible use
- Dilapidated building in Thompson Pass should be removed as it is one of the first things you see when entering

Heli-ski/helicopter operations

- No heli-drops should be allowed above backcountry ski-tourers ascending slopes
- Risk of triggering avalanche on top of Touring skier increases
- Helicopter use is increasing

Tailgate Event

- Tailgate event is out of control and needs to be put on a permit basis
- Snow machine use in the TPSUA has grown exponentially
- It would probably be best to stop issuing permits for organized events of any kind in the TPSUA
- Event results in increased human waste and trash, particularly around parking venues
- Trash is left behind for months after the Tailgate event with no accountability
- Special Events need to be more closely scrutinized due to high levels of use

Settlement Areas

Access/Location

- All land sales should have designated access roads or trails
- Proposed access roads and trails should be investigated to ensure that they are usable year-round and are not in areas in which become flooded
- Should be close to existing communities
- Land sales should not impair public access to hunting and fishing areas
- Consider intentions of earlier settlement areas when adding to existing settlement areas
- Use setback from highways
- Access that will not result in highly degraded wetlands and other resources
- New subdivisions should be providing easements to access rivers, lakes, or other common areas of interest within the subdivision
- Any settlement should be in the best interest of the community and should not allow others to impeded water to those downstream
- Future land disposals adjacent to lakes and rivers need to provide for public access
- Consider access-related impacts for settlement land

Resource considerations

- Remote recreational cabin sites that have been abandoned or are not properly permitted
- Water availability should be known to be adequate before land sales are offered
- Avoid wetlands in settlement areas or access to the area
- Not located in areas important to fish and wildlife
- Should not conflict with significant recreation usage
- Carefully selected land should be sold for residential or agricultural use
- Remote recreational cabin sites should not be in areas that are already important to subsistence users and recreationists
- Consult Native Corporations/AHTNA for subsistence areas
- Please add fish and wildlife habitat and existing hunting, fishing, and recreational uses to criteria used to select settlement lands
- Ensure that logging practices can persist in already designated areas

Other Input

- Area currently designated settlement is too close to the Gulkana shooting range and landfill
- The number of areas designated settlement should be minimized
- Goal should be to provide “pride of ownership” of lots to ensure development
- State must continue ensuring good private ownership land is made available

Motorized use – primarily outside of Thompson Pass

- 4 wheelers should only be allowed on designated trails in some areas
- Snowmobile use in some areas should be restricted

- Opportunities for non-motorized recreation should be created
- Motorized recreation conflicts with quiet recreation and displaces large numbers of quiet recreationists
- Balance is needed between motorized and non-motorized use

Mineral closing order (mostly involving Unit 28)

- No mining around rivers, lakes, other water bodies
- Please consider limiting new mineral entry

Agricultural Land

- More agricultural land should be made available
- Would marijuana be an eligible use
- Water infrastructure is needed to promote agricultural land
- Consider small scale agricultural offerings
- Identify lands that can be developed for agriculture rather than land that is unsuitable for agriculture (prone to flooding/swampy/permafrost areas)
- Lands should be designated agriculture only where adequate water is available and water quality will not be degraded
- Carefully selected land should be sold for residential or agricultural use
- Carefully selected lands that are affordable should be sold
- More parcels of additional land being put into legitimate agricultural production

Subsurface Resources

Oil and Gas

- Oil and gas exploration should not be encouraged or allowed far from existing communities and roads
- Oil and gas development fragments habitat and pipelines pose risk to salmon

Minerals

- Where mineral entry is allowed, leasehold locations rather than mining claims should be required
- Should be exception not the rule on state lands
- Impairs fish and wildlife habitat

Fish and Wildlife

- Involve ADF&G intimately/heavily in the plan decisions
- Fish and wildlife and their habitats deserve protection as an important priority
- The Tonsina River is important salmon spawning habitat

Forestry

- Support the creation of more personal use firewood gathering areas, particularly those accessed in the winter months
- Need to maintain firebreaks around populated areas around the Glennallen area where fuels are high

- The plan should incorporate comments from the state Division of Forestry in regard to fuels, firewood, and forest development

Plan boundaries

- Expand planning area to include area east of Lake Louise

Water Resources

- Support efforts to inventory waterways for inclusion into the anadromous stream database
- Water availability should be known to be adequate before any land sales are offered
- Need improved water infrastructure

General Input

- All fish waterbodies in the planning area that are documented in the Alaska Anadromous Waters Catalog should have a 200' buffer, or development setback, from the shoreline
- Remove the settlement limit that is outlined in the original 1986 plan
- Maintaining trash and outhouse facilities for visitors, current situation is unsightly and unsanitary on our roadside scenic areas if facilities are not present - are a necessity for sanitation and for encouraging local tourism
- More clearly mark trails and access roads around water bodies
- Access to the Copper River is difficult for nonmotorized boat due to limited put-in (Gulkana or Tazlina bridges) and only one public take-out at Chitina – additional access is critically needed – Need more access to Copper River
- Low-key infrastructure development (signing state lands, trailheads, off road parking areas, trails, boat launch areas) would help Alaskans access state lands
- Please develop more public use campgrounds
- Make more access to State Lands near communities for hiking, berry picking, wood cutting and traditional use – includes areas where not much state land exists due to Alaska Native private holdings
- Plan should include access to water bodies
- State should not withdraw its land selection in Thompson Pass even if the easement/trail is approved