

Copper River Basin Area Plan

Topic: Public Scoping Comments for Copper River Basin Area Plan

Comment 1 of 86 - submitted on 04/25/2016 at 12:00 AM: Please take these actions:

- 1) close the viewshed of the Denali Highway within Unit 28 to new mineral entry (claims staking or leasing); and
- 2) make the viewshed of the Denali Highway within Unit 28 a part of a future Tangle Lakes State Wildlife Refuge.

Thank you

Comment 2 of 86 - submitted on 04/29/2016 at 12:00 AM: I have property off the highway at 94 mile Richardson. I wanted to ensure I could participate in the planning of the Copper valley area lands. How do I weigh in and give you multiple other neighbors and friends opinion on the land use. Overall I feel we have thousands of park acres and thousands of native lands set aside for wildlife and habitat. What we don't have much of is lands that can be developed for agriculture or that have access to put in individuals hands allowing the community to build a synergy. People need to make a living and stay in the area, they want to just can't. The area is missing the nucleolus of people to sustain. compare school enrollment so see it is shrinking rather than growing despite one of the larges park in the world and main roads cutting through Alaska. You would think the area would grow at least a little.

With this said; how and what can I / we do to get involved with input and share with you specific areas and types of use ideas?

Comment 3 of 86 - submitted on 04/27/2016 at 07:46 PM: Please close this area to further mining claims/development. I know the decision makers may already have their agendas in mind, firmly, however please take a moment and think about the legacy, the future, and our children's ability to enjoy these unique and beautiful places. Tangle Lakes is a rare gem of wild, gorgeous river and mountains... It is a place that truly heals the spirit and body. Please help set aside this area so that future generations can benefit. There are so many other ways we can continue ahead. Please be part of the solution and not part of the status quo. We need brave souls now more than ever that are willing to set aside, protect, and encourage ingenuity. Thank you!

Comment 4 of 86 - submitted on 04/29/2016 at 12:37 PM: Thompson Pass and the surrounding area is a good place for individuals, small groups and families who place a high value on backcountry ski-touring without mechanized assistance whether it be snowmachine or helicopter to enjoy the winter scenery and solitude and world-class ski-touring.

The non-motorized demographic is a strong user group and should be accommodated in the plan. This group merits their own motorized-free zone as the two uses present a fundamental conflict. Snowmachiners, helicopter ski clients and human-powered backcountry ski tour recreationists all want the same terrain. Yet, the activities of one group can spoil the opportunity for recreation by the other. There s room for everybody and there s probably a lot of sense to designating separate areas.

Over the years, the helicopter industry has expanded its operations in the area as has snowmachine access during unregulated events like Tailgate Alaska. These large scale mechanized forms of access that operate on a for-profit basis on public lands should be required to obtain permits and be monitored as to their compliance with the terms of the permit. Helicopter permits should be further scrutinized to address frequency and saturation levels of operation. This is a public safety consideration. No heli-drops should be allowed above backcountry ski-tourers ascending slopes. To facilitate this, the permit should require that helicopter operations occur on landscape beyond what the human-powered skier can travel in a day s tour. It s easy for helicopter operators to do this and it solves the problem.

Tailgate Alaska has expanded and popularized snowmachine access from the road. Sounds like this annual event is out of control and needs to be put on a permit basis with terms that require a bond be posted to ensure a thorough clean-up. Alcohol consumption perhaps should be regulated as well.

An emerging demographic is skiers/snowboarders who access the backcountry with snowmachines. Their right to recreate needs to be recognized as well. In order to avoid conflict with individuals and groups wishing to make ski-tours with human power only, the groups should be separated.

Clear topographic boundaries should be used to separate different user groups. This makes it easy for everyone to understand and allows simpler enforcement. The Turnagain Pass area in CNF is a successful example, recreationists using only human-power on one side of the road; mechanized-assisted access on the other. Very clear boundary in the middle.

Please give attention to the well-thought out and detailed comments of Tory Dugan. He represents the concerns of the backcountry skier who wishes to access the area without the use of snowmachines or helicopters in a quality fashion and offers several positive and constructive suggestions.

Comment 5 of 86 - submitted on 04/19/2016 at 10:33 AM: 1. The Denali Highway, from Paxon to Rock Creek is a high value recreation and wildlife area. It should be retained in State ownership and withdrawn from mineral exploration and development. This area Unit 28 is currently not within the CRBPA planning unit, and should be added. Long term, the state should consider relinquishing it state selections and which would enable BLM to create a Special Recreation Management Area. BLM already has significant management presence with Tangle lakes Campground, Wayside and the Nationally important Delta Wild and Scenic River. The entire Denali Corridor has become regionally more important for its wildlife and recreation significant values.

2. Retain the lands surrounding the Kenny Lake School (Unit 18) and well in state ownership and not available for home sites. The lands are currently used for school education programs and cross country skiing. The are also used for naturalist tour programs with Princess Tours and Wrangle Institute for Science and Environment. The Tonsina River is important salmon spawning habitat.

3. The Willow Creek watershed is largely undeveloped and supplies the culinary water for the community of Kenny lake. In the past ten years the state has opened up large portions of the upper watershed to agricultural use. The agricultural lands have been cleared and the

effects of that use have not been assessed as to the melting of the permafrost or the effects on local wells. There is currently a research project taking place on the effects this use on the water yields and quality. These lands should be placed in a management unit with restrictions on clearing of the land and sale for home sites.

Comment 6 of 86 - submitted on 03/21/2016 at 06:35 AM: Please consider the non-motorized user. At this point the snowmachiner has a lot of terrain to access. There are hundreds of snowmachiners ever weekend even in the former slow months of January. This is great to see so many people experiencing the mountains. But this pushes BC Skiers to the North usually in the areas of Crudbusters and Billy Mitchell. The Problem is once Helicopter operations begin they use this same area whether skiers are climbing or not. They have been approached multiple time and asked to not do this. They are not easy to work with. They have a sense of entitlement to ski whatever they choose and not consider other users. When they do "drop in" on skiers climbing they approach it with a laugh it off no big deal attitude. The problem is that it is a big deal. 1. The risk of triggering an avalanche on top of a group ascending is devastating and preventable by segregation of users. 2. It essentially ruins the experience for the backcountry skier. A lot of these BC ski users come from Europe Canada and the continental US. When they have these bad experiences they tell others who decide to visit other areas when they spend a lot of money on a Ski trip. This is lost revenue to the area and the state. Back country skiing is the most growing sector of the ski industry. Every ski shop in Alaska now has a whole section devoted to this user group. 10 years ago there wasn't a small section in one shop. Please consider this option of a non motorized area. A good compromise before lawsuits are filed or even worse a violent altercation between users groups or some one killed in a tragic but preventable accident.

Comment 7 of 86 - submitted on 03/23/2016 at 11:07 PM: The Thompson pass area is a widely used area by motorized and non motorized users and attract a lot of people from all over the state, USA and foreign country's to be able to experience this privilege, of being in a helicopter skiing/snowboarding one day and the next snowmobiling and also being able to experience non motorized recreation. If we turn Thompson pass into a non motorized recreational area this will hurt Valdez economy that so many business depend on as well leave a lot of local residents with less options to recreate on Thompson pass. Please do not segregate Thompson pass and take away freedoms from the citizens of Alaska, USA and foreign visitors.

Comment 8 of 86 - submitted on 04/25/2016 at 12:00 AM: We spend some time at the Tangle lakes every summer.

1. To close the viewshed of the Denali Highway within Unit 28 to new mineral entry (claims staking or leasing).
2. To recommend that the viewshed of the Denali Highway within Unit 28 be part of a future Tangle Lakes State Wildlife Refuge.

Thank you for this opportunity to comment

Comment 9 of 86 - submitted on 04/29/2016 at 09:59 PM: SETTLEMENT: -All residential land sales areas should be carefully considered and close to existing communities. If there is a scarcity of affordable land for young people, some affordable land should be made available BUT not by undermining local private land prices. -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. -Remote recreational cabin sites should not be in areas that are already important to hunters, fishers, and recreationists. -Land sales should not impair public access to hunting and fishing areas; e.g., ridges that lead to sheep country, or creeks with grayling. -All land sales should have designated access roads or trails. Otherwise, OHVs can and are doing great damage. -Land should be reserved for neighborhood and community trails and parks or greenbelts or open spaces. -Land surrounding Tonsina Lake and the Tonsina Lake Trail should not be settled because of its importance to hunters. -Klutina Lake is prime bear habitat and is well-used by bears. This makes it unsuitable for settlement.

WATER RESOURCES (STREAMS, LAKES, WETLANDS, GROUND WATER): -As a Kenny Laker since 1977 who hauled water for years and has a well (after drilling 3 times), I know how important and scarce water is. We have to run our water through 3 large filters, a water softener, and for our drinking water, a reverse osmosis system. -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 should not be impaired by new sales. -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 quality.

FISH AND WILDLIFE HABITAT: -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. -The Alaska Department of Fish and Game should be heavily involved in this planning process. Game biologists should plan management to keep herds stable and strong, with no influence from guides or politicians, according to my husband. -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 Wildlife 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).

TRANSPORTATION AND TRAILS: -Some areas and trails need to be non-motorized. We use a 4-wheeler to get wood and do chores, but similar to the right to motor into some areas, I have the right to some places that have the peace of quiet. I also think there should be some areas that snow-machines can't go on because a bunch of tracks look like litter. -The tradition of hunting on foot, which many Alaskans used to enjoy and take pride in, is being lost. My husband has hunted and fed our family here for almost 40 years, and he is having a harder and harder time. It's not because he's in his 60s, but because he says hunting from a 4-wheeler isn't hunting and he can't compete with the almost completely unregulated motorized chasing of game. He thinks 4-wheelers should only be allowed on designated trails in some areas, with other areas reserved for non-motorized hunting. -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 designated motorized trails, and in Controlled Use Areas, ATVs can be used for non-hunting purposes. With the exception of the Rusty Lake Trail, we know of no designated non-motorized trails on state land in the Planning Area. -Backcountry skiers have proposed a non-motorized zone at the northern partly wooded end of the Thompson Pass area. -Non-motorized trails are much cheaper and easier to build and maintain than motorized trails. -A road link to Cordova (the old Copper River Highway idea) should be

AGRICULTURE AND GRAZING: -Agriculture land sales should be of various sizes to promote local and regional self-sufficiency or larger markets; they should be suitable for crops that will grow well in our changing climate, and (like current agricultural offerings) they should have covenants to keep them agricultural. If they are covenanted, they will not compete with private land sale prices. Some land with good soil should be small enough to be affordable to young people. -The potential for spreading invasive species of plants should be a consideration in framing all goals and policies removed from the plan.

RECREATION, CULTURAL, AND SCENIC RESOURCES: -Maintained outhouses are a necessity for sanitation and for encouraging a tourism industry that will be a source of local businesses and jobs. -Klutina Lake should remain public because of its heavy use by fishers, hunters, and recreationists. -Balance is needed between motorized and non-motorized uses of the land.

FORESTRY: -A mechanism is needed for the State, BLM, Ahtna, and Chitina Native Corp. to collaboratively keep track of all anticipated 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.

SUBSURFACE RESOURCES: -Oil and gas exploration should not be encouraged or allowed far from existing communities and roads. Fossil fuels 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. -The goals for fossil fuels need to change in view of climate change. The goal should be to wean ourselves off these energy sources. -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. -Mineral and fossil fuel development should not be an allowed use within sight or sound of highways. Keeping our highways scenic is important to Alaska's growing tourist industry and to Alaskan travelers.

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 Wildlife 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' ideas for expanding the Area boundary near Lake Louise, and also extending the southern boundary west to include Thompson Pass.

Sincerely, Felicia Riedel and Tom Butler Kenny Lake, AK

Comment 10 of 86 - submitted on 04/29/2016 at 12:00 AM: On behalf of the Copper River Watershed Project and its members, I am writing to submit comments for inclusion in the Alaska Department of Natural Resources' update of the Copper Basin Area Plan. We want to echo the comments made by the Copper Country Alliance in the areas of residential and recreational development, agriculture and grazing, water resources, fish and wildlife habitat, transportation and trails, recreation, cultural and scenic resources, forestry, sub-surface resources, boundary adjustments, climate change, and invasive species.

In particular, we would like to add the following comments to your consideration for a draft plan:

- 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. Salmon are the economic foundation of this region as they support subsistence, sportfish, and commercial fishing economies: "Salmon is the foundation of the region's seafood industry, accounting for 85 percent of total first wholesale value produced in Southcentral [Alaska]. Sockeye and pink salmon are the most important species in commercial salmon fisheries." (The Economic Impact of the Seafood Industry in Southcentral Alaska, McDowell Group, 2015.) Streams and rivers also provide spawning and rearing habitat for king and coho salmon which support the region's subsistence and sport fishing economies.

We are especially concerned about potential development around Tazlina Lake, as the lake is a critical spawning and rearing lake for sockeye salmon. Changes to hydrology around the lake's shoreline would alter the water flows that are essential for oxygen flows to salmon eggs incubating over winter along the lake shoreline.

- Set aside wetlands from development. Wetlands in the Copper River valley provide an essential function for water storage, aquatic habitat, and buffering from flooding. Research shows that there has been a loss of 31 percent of total area of surface waters and a loss of 54 percent of the total number of surface waters (closed-basin ponds) in the Copper Basin over a 50 year period (1950 - 2002) (Riordan, 2006). Research on connectivity also shows how important wetlands are for supplying water flow to small headwaters streams, which provide spawning and rearing habitat for salmon (Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence, EPA, 2015).

- Expand the Willow Creek watershed area for research (see Copper Country Alliance comments).

- Grant formal recognition to the Copper Basin 300 competition trail. This event provides an important recreational resource for dog mushers both living in and coming to the area, and provides important winter tourism for the Copper River basin.

- Designate "management intent" for moose habitat in planning unit 28. This section provides important over-wintering habitat for moose in the Copper River basin, and moose are a valuable subsistence species for regional residents.

- Grant formal recognition to heavily used trails and access points that provide resources for public recreation.

- Preserve the wilderness character of the Tiekel River drainage on the lower Copper River corridor.

- Consider incorporation low impact development concepts such as site drainage plans, maintaining vegetative buffers for waterbodies, and incorporating lot contours into development plans to minimize opportunities for erosion and drainage problems.

- Designate sites that hold particular value for renewable energy generation such as wind, solar and hydro-power and restrict availability of those sites to renewable energy development.

Thank you for the opportunity to comment and we look forward to working with the Department of Natural Resources as this planning process moves forward.

Sincerely

Comment 11 of 86 - submitted on 03/30/2016 at 12:54 PM: I believe it is of the utmost importance for a portion of the Thompson Pass area to be off limits to recreational motorized vehicles. There are many reasons but the most important of these is safety (snowmachine vs skier, etc), avalanche triggers, environmental including noise pollution.

Thanks

Comment 12 of 86 - submitted on 04/24/2016 at 12:00 AM: Please include in the Copper River Basin Plan to:

Close the view shed of the Denali Highway within Unit 28 to mineral entry and include the view shed of the Denali Highway within Unit 28 within part of a future Tangle Lakes State Wildlife Refuge.

Thank you for your consideration

Comment 13 of 86 - submitted on 04/28/2016 at 12:09 PM: I support the proposed non-motorized area on Thompson Pass.

Comment 14 of 86 - submitted on 04/29/2016 at 06:14 AM: I would like to recommend that the viewshed of the Denali Highway within Unit 28 be closed to new mineral entry, and make it a part of a future Tangle Lakes State Wildlife Refuge. This area is an amazing place for recreation and a gem for our beautiful state of Alaska. I have canoed the Tangle Lakes out to the Delta River, and the beauty, the quiet nature, and the wildlife that we experienced on these trips left us in awe. What makes Alaska truly great and what draws people in is the natural beauty and wonder, its wildness, and the communities that strive to protect it. Mining not only destroys habitats, but it takes away the beauty, the wildness, the serenity. Please protect this area and our great state of Alaska. Keep it wild.

Comment 15 of 86 - submitted on 03/25/2016 at 12:33 AM: There are three things to consider with the regulation of motorized use in Thompson Pass.

History and Context: For decades Thompson Pass (TP) and Valdez have been meccas for snow machining and helicopter accessed skiing and snowboarding. As a born and raised Alaskan, I remember going down to TP with my father, riding around the area and watching the hill climb. As an adult, I continued yearly pilgrimages to the area, using snow machines to access world class skiing terrain. Publicity has made this area recognized internationally as a destination for snow machine and heli access back country ski and snowboarding. These activities are iconic to the area and put Valdez on the map for winter tourism; eliminating or decreasing these activities would be detrimental to the attraction for winter related sports in this area, which brings me to the next point.

Economy: There are at least three businesses that operate in the TP and Valdez areas for winter tourism based on snow machine and heli accessed snow boarding and skiing. These companies provide jobs and draw tourists from around the world to visit this otherwise desolate area in Alaska. These tourists visit the town of Valdez and spend money at local businesses. Valdez itself is a town that has an economy dependent on the oil industry. Denying or limiting the use of these methods of transportation will hurt the economy in Valdez and Thompson Pass.

Equity: I have experienced my most precious moments in this area, and I would never want to deny others the ability to have the same luxuries that I did, accessing amazing terrain via snow machine. Limiting snow machining, snow cat, and helicopter access options in TP would damage the current context that draws people to this amazing place and will deny many from entering and enjoying this space. There is no part of life in Valdez or Thompson Pass that is devoid of carbon emissions due to the fact that traveling to this area requires driving in by motor vehicle, plane, or boat. Skis and sleds used by non-motorized proponents are also often petroleum based products. While I support environmentally conscious lifestyle choices and movements, pointing the finger at certain user groups and denying them access to an area is discriminatory.

For the reasons listed above, I am in support of maintaining the current user allocation in the Valdez and Thomas Pass areas. I am also in support of incorporating public use huts in the area.

Comment 16 of 86 - submitted on 04/29/2016 at 01:40 PM: I live at the base of the pass, at Mile 19, otherwise known as the Heiden View subdivision. The area is my backyard, and I spend time hiking, skiing, berry picking, and trail running there almost daily. I appreciate others' love of motorized sports, and in the past, there was space for everyone to recreate. However, I have seen usage grow exponentially even the five years I have lived here, and believe it is time to manage the area differently. The most vulnerable I've ever felt was a day ski touring as snow machiners came into the area to high mark above me. Unfortunately, education is not enough: I 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. I also support stronger permit requirements on heli-ski operations, to end their practice "landing" on mountains with skiers on slopes below. As I understand it, this is unacceptable in most heli-ski destinations.

Comment 17 of 86 - submitted on 04/27/2016 at 10:35 AM: AK Department of Natural Resources Division of Mining, Land, and Water Attn: Brandon Mc Cutcheon, Charles Pickney, and Tyler Fanning Re: Thompson Pass Winter Usage & Management and the Copper Basin Area Plan

I am submitting this comment because this seems like a pivotal time for the Thompson Pass area with recreational use exploding at the same time the Copper River Basin area plan is being updated. We need regulations to separate conflicting user groups.

After growing up in Girdwood, I have lived and owned property in the Heiden View subdivision at Mile 19 on the Richardson Highway for most of the last 9 years. I am a carpenter so there's work pretty much anywhere and I chose to live here because of the scenery, solitude, and world class ski touring. I recreate in the Thompson Pass Special Use Area multiple times a week skiing, hiking in the summer, and occasionally snow machining. I am intending to raise my 1 year old daughter Polly here at 19 mile provided this area changes its current trajectory and I can still find a safe place to ski and breathe fresh air.

The Thompson Pass area was a very different place when I moved to 19 mile 2006. There were three or four weeks a year when there were helicopters and snow machines all over the place and the rest of the winter/spring ski season was relatively quiet. It wasn't necessary to have a non-motorized zone set aside although it would have been nice. The local Valdez segment of Thompson Pass recreationalists were mostly considerate and knowledgeable individuals and that's still the case. The difference I see up there now is the influx of people from other places, many of whom are uneducated in backcountry safety and etiquette. Many are downright disrespectful to both the land and to other users. Snow machine use in the TPSUA has grown exponentially for several reasons. There are more snow machiners coming from other parts of Alaska because much of Alaska doesn't seem to get enough snow anymore. Ten years ago a beautiful weekend in January or February saw little activity. This year the pass was like a hornet's nest at that time. Tailgate Alaska brings a different demographic than ever before; snow machine skiers from the lower 48. In the last few years a large percentage of the Tailgate population consisted of the uneducated and disrespectful people I mentioned earlier. A place with no rules is very attractive to them. The concept of no rules is also attractive to me but it only works in sparsely populated places. It's unlikely that the Thompson Pass area will be sparsely populated again between January and May.

Tailgate Alaska isn't run by an Alaskan and isn't bringing much money to Alaska or to the city of Valdez. People show up in RV's and park them for free at one of the many giant pullouts plowed for them by the state DOT. They barely go into Valdez because the party is on the pass. They make a mess there that the DOT cleans up when they leave except for the spilled gasoline that seeped into the ground. There are burned couches and discarded snow machine parts. Camp One Love, an extension of the Tailgate party across the road would be better named Camp One Big Mess of mud, trash, and human excrement. Tailgate Alaska is an event that involves a lot of binge drinking and heavy drug use. Would it be responsible to bring a 15 year old to Tailgate? If not, maybe it shouldn't be held for profit on public land. That type of activity belongs in bars or on private property. It would probably be best to stop issuing permits for organized events of any kind in the TPSUA.

The helicopter ski companies aren't contributing to the state or local economies much either. Of the five operators three are owned by people who live outside Alaska. The two operators that use the proposed non-motorized zone the most; Valdez Helicopter Ski Guides, and Rendezvous guides, are owned by out of state people. 90% of the people they employ come from out of state as well. Both of those

operators also provide lodging, meals and drinks for their clients so neither the city of Valdez or the State of Alaska is getting any of that money. Amazingly, commercial helicopter skiing is classified as a generally allowed use of DNR land, so there is no limit to the amount of helicopter ski companies or any permits required for them to operate.

I was told by Cliff Larson who is in charge of issuing land use permits in the TPSUA that the DNR wants as much commercial heli skiing on their land as possible. I don't agree that the TPSUA should be saturated with heli skiing. But even if someone supported that, wouldn't the number of helicopters be the limiting factor as opposed to the number of operators? If an operator has a lot on the books they just add another helicopter to accommodate the extra skiers. There is a lot of conflict and animosity between all five of the Valdez heli ski operators and it's predictable because they are all operating in the same area. There are a lot of days when there are just a few isolated pockets of clear weather and that leads to multiple operators trying to land on the same peak. Two operators instead of five, each with their own terrain makes sense because that would lead to the least amount of conflict and also avoid one operator having a monopoly. The easiest way to implement that would be to require permits.

Does more regulation or government infrastructure in the TPSUA mean an extra drain on Alaska's already dwindling budget? Maybe not. Here are a few ways the Alaska could actually make money up there instead of losing it:

1. Require a permit for heli ski companies and limit the number of permits. Put the permits up for bid. Tax the heli companies for each skier they have in the field each day. Even \$10 a day would be better than nothing. \$100 per person per day going to the state (or less than 10%) might be more appropriate. Heli skiers are mostly wealthy people from out of state. People would pay depending on how much of our resource they used up (the resource being fresh powder snow and solitude).

2. Build a campground designed to function in the winter and outlaw camping within 1/2 mile of the highway during March and April between Valdez and mile 60.

3. Create a non-motorized zone: It's hard to imagine a better place to go ski touring than the TPSUA, and the world is starting to realize that. I was surprised to meet a lot of Europeans on the pass this year who were only touring and not skiing by helicopter. This type of tourist actually stays and eats at local establishments. Another benefit of non-motorized tourism is the higher carrying capacity. For instance, imagine if there were 1000 snow machines driving around the TPSUA at once. There would be a smog of 2 stroke exhaust and the ground would be paved with their tracks (which is already the case to some degree). There would be a constant drone that would be impossible to ignore unless you were one of the helmeted drivers. Now imagine 1000 people ski touring in the same area. Even for a huge number of people the impacts to the resource would be light but the impacts to the economies of the city of Valdez and the state of Alaska would be significant.

It's hard to imagine anyone in Valdez wanting snow machine tourism here because what's being taken is so much more than what's being given back. It's especially hard to imagine local snow machine enthusiasts promoting motorized tourism like Tailgate Alaska here. Why would they want to be crowded out of their own backyard and put at risk by careless strangers?

4. Require a \$500 snow machine use permit with a mandatory backcountry etiquette and safety class for out of state riders. That would hit three birds with one stone; educating, bringing in revenue, and discouraging more snowmachiners from coming to a place that's already overrun.

5. The TPSUA is a jewel. Turn the entire TPSUA into a state park. Charge out of state people more for a permit that Alaskans are charged. Issue the permits on a yearly basis so locals wouldn't be paying much or maybe just exempt locals completely.

My Proposed Non-Motorized Zone (Please Refer to the attached Map)

There are two other major centers of backcountry skiing in Alaska in addition to Thompson Pass: Turnagain Pass and Hatcher Pass. Both places are divided into motorized areas and non-motorized areas. It's hard to think of any popular backcountry area in the lower 48 that doesn't include a non-motorized zone. The DNR included a map of the TPSUA with their survey for people to draw on. I included my own map here because there isn't a realistic non-motorized zone on the map the DNR provided. Any zone created between Thompson Pass and Cascade Creek would interfere too much with snow machining and sled skiing to have enough local support. On my map the proposed non-motorized zone starts just to the north of where the DNR survey map ends and goes north from approximately mile 34. The zone I propose is good for skiing but not for snow machining. In fact, 10 years ago there generally weren't machines in the proposed zone at all. None of it is on the way to anywhere else for someone on a snow machine. It's a bunch of steep slopes, brushy valleys and dead ends.

There is a strip of BLM land that follows the highway through most of the proposed non-motorized zone. It has been selected as land that could possibly be transferred to the DNR and I support that transfer in the name of simplicity. But even if that land stayed in BLM hands and I would want the state to designate their portion as non-motorized because all the helicopter landing zones there are on DNR land.

I called Cliff Larson in an effort to learn about DNR policies regarding permitting and I asked him about the TPSUA surveys he and Jess Meybin had created and are now processing. He told me they had received more than 50 surveys that included my alternative map (almost identical to the one attached here). He said those surveys were not legitimate because my map had been added to the packet even though the original TPSUA survey and original map created by Cliff and Jess was also included. He said my map wasn't actually inside the TPSUA and furthermore it included some of the state selected BLM land. An email correspondence between Cliff and I followed in which he sent me a link to a map delineating the boundaries of the TPSUA. Here it is: http://dnr.alaska.gov/mlw/sua/sua_list.cfm The map Cliff sent me confirmed my map to be within the TPSUA after all. My emails asking Cliff for confirmation on that and my questions as to what he and Jess intend to do with those surveys that included my map have not been responded to. I'm worried they will be disregarded and never appear on your desks. If you don't see those surveys, at least know that 50 of them were submitted in support of my non-motorized zone.

User Conflicts

So what about helicopter skiing? Heli ski companies have and advertise a staggering amount of terrain, yet they often compete for the same runs accessed by the highway in order to cut costs. This presents a very real safety risk for people ski touring and snow machining. As backcountry touring has become more popular, there's a worrisome trend of helicopters dropping skiers directly on top of people skinning from the highway. This isn't currently illegal, but it's rude, unsafe and against international standards for the industry. There is no excuse; skiers below are easily spotted from the air. But if guides routinely fail to see touring skiers, all the more reason for a non-motorized zone. When the Forest Service issues a permit to a heli ski operator there is a clause requiring the operator to yield to non-commercial users and to stay away from them at least half a mile. That clause doesn't currently exist on DNR land because commercial heli skiing doesn't require a permit. This land belongs to all Alaskans but using it to make money on it is a privilege. In addition to the fully non-motorized zone depicted on my map I would like to see heli ski operators banned from all the terrain directly above Richardson Highway between mile 26 and mile 54. It's true that Thompson Pass is home to world-class skiing right above the road. It's also true that there's world-class skiing, accessible by helicopter, just beyond the road corridor. Heli skiing is a luxury activity and they can afford to fly a little further away. The extra costs can be passed on to the clients. On the Kenai Peninsula there isn't a single place where heli skiers are allowed to ski the terrain above the highway and that's how it should be in the Thompson Pass area as well.

I've had the Valdez Heli Ski Guides land on top of me and ski down past me multiple times. Two of the times were on a mountain commonly called RFS on the south side of Cascade Creek and directly above the highway; once in early March of 2015, and once in early March in 2016. Both of those incidents were in perfectly clear and calm weather. Both times multiple helicopter loads of skiers were dropped on top of me while I was already climbing. The 2015 incident was most notable because I was able to ski right over to the one of the groups without taking my skins off and confront the guide. The guide was apologetic and claimed not to have seen my partner and I. This was amazing because in addition to the perfect weather, and multiple landings, there was another group of skiers climbing RFS besides us! VHSG has also landed on me multiple times on Crudbusters at mile 40 which I don't have dates for. I recently talked to VHSG's lead guide about their etiquette regarding touring skiers. She claimed it was OK for heli skiers to land on top of people who were climbing as long as the people from the helicopter skied a different line than the line the touring people were climbing up. This shows a new level of audacity from that company because a situation like that used to elicit "I'm sorry, we didn't see you there." But until there's some sort of regulation in place people in a helicopter are within their legal rights to ski right down on top of other backcountry users.

I've also been put at risk by snow machines riding above me or too close to me. Those incidents happened in Moonlight Basin above the hairpin turn at mile 24 and also on lower Girls Mountain above the Tailgate Alaska parking lot. My experiences with careless heli ski operators and careless (or possibly malevolent) and inebriated snow machiners are nothing compared to what's happened to many of my ski partners and I've heard of more incidents like that during this 2016 season than ever before.

Other concerns in the Copper River Basin

With regard to the Copper River Basin outside of the TPSUA, I would like to see more areas restricted to ATVs. Especially the area of the Richardson Highway north of mile 50. I've heard from multiple sources that the moose and Dahl sheep populations have been decimated there because of the recent ATV trail starting at mile 54. I would also suggest tests to be conducted measuring contamination from mining in Ernestine Creek as I have heard the gold mining operation there is poisoning the water.

In summary, DNR land in the Copper River Basin could use more management, mostly in the Thompson Pass Special Use Area. There is a desperate need for a non-motorized zone. Thank you for considering my comment.

Tory Dugan Mile 19 Richardson Highway. Attachments - Map of non-motorized zones

Comment 18 of 86 - submitted on 04/14/2016 at 11:15 AM: HC 60 Box 227, Copper Center, Alaska 99573 " 907-822-3418

April 14, 2016

To: Alaska State Land Use Planning Commission

Dear Commissioners,

The Board of Directors of the Wellwood Conservancy wishes to express its concerns about the Land Use Plan currently under discussion for the Copper River Basin, which includes the Willow Creek watershed area. The Wellwood Conservancy is a nonprofit organization which manages and leases the Wellwood Nature Preserve south of the Edgerton Highway in the Kenny Lake area. Wellwood Conservancy was incorporated in June of 2010 in order to continue and broaden the conservation and education efforts that had begun privately at the site many years previously. It is of vital importance to maintain the health of the Willow Creek watershed. We urge, therefore, that careful consideration is made of the impact of any plans for this region on the watershed. One concern is that the upper area of the watershed has many very small rivulets and small streams. These may seem unimportant at first glance. However, these tiny streams, possibly supported by permafrost, lead downhill to the formation of Willow Creek itself. If roads or trails are built across them, this will interfere with the flow, and cause serious harm to the Willow Creek watershed. Further downstream, in the area of the Wellwood Nature Preserve, water begins to go underground. In certain years, the creek loses flow in this downstream region. The fragility of the system underscores the importance of maintaining the flow upstream, as this has an effect on the downstream health of Willow Creek. The flow of the Creek is important for many reasons. There is a flourishing beaver population on the Nature Preserve, as well as fish such as grayling, dolly varden, and other species. Even further downstream, below the Nature Preserve, Willow Creek serves as a nursery for silver and king salmon fry. In addition, there is substantial recreational value in the trail system. The trail system on the Wellwood Nature Preserve connects with the trail on the north bluff of the Tonsina River. This is a high value public use trail, used for a long time by local residents and many visitors to the area. It is worth preserving. Willow Creek contributes greatly to the education and enjoyment of visitors. The Wellwood Conservancy works closely with other local organizations such as WISE, the Wrangell Mountain Institute, Kenny Lake School, and the Copper River Watershed Project to contribute to outdoor education, tourism, conservation efforts, and public land use. Thank you for the opportunity to give input to the Copper River Basin Area Plan. We trust the Land Use Planning Commission will take our concerns into account, so that the Willow Creek watershed will be healthy for many generations to come, an asset to our grandchildren and great grandchildren. Sincerely, Dorothy J. Dunne President, Wellwood Conservancy Board of Directors

Comment 19 of 86 - submitted on 04/29/2016 at 12:00 AM: Thank you for the chance to comment on this major state lands planning effort. Although I'm submitting these brief comments as an individual, I am a member of the Copper Country Alliance (CCA) board, and I completely endorse and incorporate by reference its comments; this includes its planning boundary recommendations, and its list of trails and areas that should be designated as suitable for non-motorized recreation and that should be recommended for closure to motorized use.

Probably the most important thing the Plan can do is protect fish and wildlife habitat and populations. They are heavily relied on by both qualified and other subsistence users. They are highly valuable for sport hunters and fishers from throughout Southcentral and Interior Alaska. Recreationists of all sorts, and both Alaskans and visitors, enjoy them in a wide variety of ways. One of the best ways to protect fish and wildlife is to involve ADF&G intimately in the plan decisions. I strongly believe that the ADF&G commissioner should be a co-signer with the DNR commissioner, as used to be the case. Finally, in this regard, to better protect the extremely important Nelchina Caribou Herd, the lands within the proposed Tangle Lakes State Wildlife Refuge should be closed to new mineral entry, and the Plan should recommend that the legislature create that refuge.

I'm concerned that settlement is such a focus of the revision. The number of areas designated settlement should be minimized. Settlement should generally be for needed expansion near existing communities; should not be located in areas important to fish and wildlife; should not conflict with significant recreation usage; should include opportunities for rural young people to obtain affordable raw land; should not compete with the private market; and should have means of access that will not result in highly degraded wetlands and other resources. Governor Hammond had it right--private land is the ultimate lock-up.

Natural quiet and natural sound should be protected and, where appropriate, restored. They should receive as much consideration as other ecological values like clean air and water. They are important to both humans and wildlife, and have been ignored and neglected for far too long.

Quality opportunities for non-motorized recreation should be created. Except for the lands managed by the Division of Parks and Outdoor Recreation (and even on many of those lands, for example, Denali State Park), DNR does a very poor job of providing opportunities for quality recreation for anyone but motorized recreationists. Not only does motorized recreation conflict with quiet recreation and very significantly detract from it, but it completely displaces large numbers of the many quiet recreationists who are seeking areas and trails free of the conflicts and impacts created by motorized recreation. Managing for motorized recreation can also be very expensive. For example, a great deal of money is being expended in the Tangle Lakes area on controversial trail extensions and improvements, and very little on non-motorized opportunities (the Rusty Lake Trail is a very much appreciated exception, although it now appears that flooding may make the trail unusable). Additionally, closing areas to motorized recreation doesn't just benefit muscle-powered recreationists--it also provides many ecological benefits by protecting fish and wildlife habitats and populations, clean air and water, soils and vegetation, summer and winter scenic landscapes, natural quiet and sounds, and intangible but very important wildlands character. Finally, if the Traditional Means of Access statute prevents DNR from using its land management expertise to make appropriate closures larger than 640 acres, the plan should recommend that the legislature repeal the statute and stop micromanaging public lands management.

Water quality and quantity need to be protected. This is true throughout the Basin, but might be especially important in the Kenny Lake area where many if not most people rely on community wells and where water quantity has already been an issue on occasion. Lands should be designated settlement and agriculture only where adequate water is available and water quality will not be degraded. The Willow Creek Watershed is a good example of a place that needs to be managed very carefully and conservatively.

Oil and gas exploration and development should not be a priority; leasing should be selective, not generally permitted on nearly all state lands, as it seems to be now. The state should be aggressively attempting to wean itself off of fossil fuels, not effectively encouraging their use.

Mineral development, too, should be the exception, not the rule.

Climate change should be a lens through which all decisions are evaluated.

Thank you again for the chance to offer these comments.

Sincerely

Comment 20 of 86 - submitted on 04/29/2016 at 12:00 AM: Copper Country Alliance is a volunteer grassroots 501(c)(3) organization that addresses conservation issues in the Copper Basin. The majority of our members are Copper Basin residents. They hunt, fish, hike, ski, snowshoe, pick wild berries, grow gardens, harvest firewood, enjoy and photograph the region's wildlife and stunning views, and participate in community projects and activities. We all want these activities to continue to be available, not just for ourselves, but for generations to come. Public lands and water are essential for these activities.

We appreciate the way that Area Plan public scoping meetings were held. The meetings were well-designed to encourage public participation, and planners showed a willingness to listen and to answer questions. We also are pleased that planners recognized mistakes that were made in designating earlier settlement areas and have some new and better criteria.

Public land is a rare resource in many parts of the United States. Alaska is fortunate indeed to have so much public land, and we strongly believe that the vast majority of it should remain public. Locked gates and "no trespassing" signs will-if Alaska chooses to privatize its land-greet those who used to hunt, fish, gather, and travel on that land.

There are also good economic reasons for keeping almost all state land public. Hunting, fishing, and gathering constitute an important non-cash income. Those activities, together with non-consumptive uses, also bring cash income to the region, in the form of purchased supplies, gasoline, and lodging. Expanding tourism opportunities on public lands can further contribute to the economy.

At the same time, we recognize that a certain amount of carefully selected state land should be sold for residential and agricultural uses. Our young people need affordable land on which to build. Alaska needs to be more self-supporting by growing more of our food.

Not only humans need land. Fish and wildlife do also. Their habitats deserve protection.

The above constitute the main themes of our more detailed comments, below. Some comments are repeated under different headings.

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. Let's not rush 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. If there is a scarcity of affordable land for young people, some affordable land should be made available. Please keep in mind that there is a lot of land on the private market.

- Remote recreational cabin sites should not be in areas that are already important to subsistence users and recreationists.

- Land sales should not impair public access to hunting and fishing areas; e.g., ridges that lead to sheep country, or creeks with grayling.

- All land sales should have designated access roads or trails. Otherwise, OHVs can do great damage.

- 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. Unlike what happened at Kenny Lake some years back, lack of community decision about what to do with such land should not cause it to be sold. Instead, it should be held for the future. Some of the land in Unit 18 north of the Edgerton Highway could serve a dual purpose of watershed protection and community open space.

- 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

AGRICULTURE AND GRAZING:

- Agriculture land sales should be of various sizes to promote local and regional self-sufficiency or larger markets; they should be suitable for crops that will grow well in our changing climate, and (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.

- One important large piece of agricultural land that might now belong to the state is the William Sutton homestead. It is located at about mile 14 3/4 of the Edgerton Highway (Unit 18). We urge that it be offered as agricultural land, subject to agricultural covenants, rather than sold in some other way.

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 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. 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. Remote 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.

- The Alaska Department of Fish and Game should be heavily 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 he believes 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 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 30 years about anadromous and non-anadromous fish must be added for each Unit. Area fish benefit people from Anchorage to Fairbanks and points between. They contribute importantly to the wildlife food chain.

- 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 Wildlife 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/>

- Klutina Lake is prime bear habitat and is well-used by bears. This suggests that it is unsuitable for settlement.

TRANSPORTATION AND TRAILS

- 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, and in Controlled Use Areas, ATVs can be used for non-hunting purposes. With the exception of the Rusty Lake Trail, we know of no designated non-motorized trails on state land in the Planning Area.

- Visitors from foreign countries, the South 48, and even Alaskan communities like Anchorage are used to having the option of taking non-motorized trails. These people and others seeking quiet outdoors experiences deserve some good opportunities for their 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 trails.

- If the Plan cannot designate non-motorized areas or trails, it could note suitability for non-motorized uses in the "resource information summary" for each unit. It could also make non-motorized areas and trails a goal.

- We suggest that the following areas and trails are suitable for non-motorized designation or recommendation:

- o Tiekel 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 West side of the Copper River from O'Brien Creek south. (Note: Chitina EMT Michael Moody brought up at the Chitina scoping meeting that emergency response beyond O'Brien Creek has been dangerous and harrowing because of massive sliding. A future hiking trail could be included in the plan, but acknowledging this problem. Maybe in the not-so-distant future, a segment could be developed beyond Haley Creek, with the start being accessed by boat.)

o Some non-motorized routes or trails in the Nelchina Public Use Area

- A road link to Cordova (the old Copper River Highway idea) should be removed from the plan.

RECREATION, CULTURAL, AND SCENIC RESOURCES:

- Maintained outhouses are a necessity for an encouraging a tourism industry that will be a source of local businesses and jobs. In recent years, the State has gone backward on this economic goal. This is also a health issue, as human feces abound near highways and trailheads when outhouses are closed.

- Klutina Lake should remain public because of its heavy use by fishers, hunters, and recreationists.

- Fire hazard should be among the concerns for Public Use Cabins and Private Recreational Facilities on Public Lands.

- As discussed under our "Transportation and Trails" heading, balance is needed between motorized and non-motorized uses of the land.

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 Forestry policies, please add a guideline for protection of viewsheds and trails when harvest areas are laid out.

SUBSURFACE RESOURCES

- Oil and gas exploration should not be encouraged or allowed far from existing communities and roads. Fossil fuels 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.

- The goals for fossil fuels need to change in view of climate change. The goal should be to wean ourselves off them.

- 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 at least list it as unsuitable and make the recommendation that it be closed.

- 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.

- Mineral and fossil fuel development should not be an allowed use within sight or sound of 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. The Tangle Lakes/eastern Denali Highway area has been explored by Inco, Anglo American (under agreement with Pure Nickel), Pure Nickel/Nevada Star, ITOCHU (which funded Pure Nickel for a few years), and MMG since the 1990's. Exploratory drilling and aerial magnetic surveys were employed in Unit 28 and lands to the north and west. Drilling results published by Pure Nickel have not revealed mineralization of sufficient grade and extent to be mineable. The area south of the Amphitheater Mountains seems to have been even less attractive than north, for Pure Nickel and ITOCHU allowed many of their claims to lapse while continuing exploration to the North. (Aerial magnetic surveys flown by Anglo American also revealed more complicated structure in the southern area.) Pure Nickel/Nevada Star, which held the most claims for the longest time, no longer lists this project on their website. Subjecting Unit 28's important wildlife habitat and popular hunting, recreation, and sight-seeing area to further (and almost certainly fruitless) noisy drill rigs and helicopters would be a poor choice.

- Guidelines should say that any mineral exploration should be permitted (not "encouraged") under lease and be properly sited. In goals, reference to subsidization through infrastructure or other means should be deleted.

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 Wildlife 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' ideas for expanding the Area boundary near Lake Louise, and also extending the southern boundary west to include Thompson Pass.

CLIMATE CHANGE:

- Climate change should be a consideration in framing all goals and policies.

INVASIVE SPECIES:

- The potential for spreading invasive species of plants should be a consideration in framing all goals and policies.

Although our recommendations for changes are many, we truly appreciate DNR's efforts to solicit public comment.

Sincerely

Comment 21 of 86 - submitted on 04/28/2016 at 10:59 PM: Thank you for the opportunity to submit comments on the Copper Basin Area Plan. These comments are specifically related to winter recreation management within the Thompson Pass Special Use Area. With the ever-increasing numbers of skiers and snowmachiners recreating on Thompson Pass, combined with changes in technology that are allowing these users to travel further afield in less time and with less effort, we see this planning process as an excellent opportunity to address winter recreation conflicts and zone Thompson Pass to preserve quality recreation experiences for all user groups.

Winter Wildlands Alliance (WWA) is a national non-profit organization whose mission is to promote and protect winter wildlands and quality human-powered snowsports experiences on public lands. Formed in 2000, WWA has grown to include more than 35 grassroots groups in 11 states and has a collective membership exceeding 50,000. We work with several grassroots groups in Alaska, including the Alaska Quiet Rights Coalition. Many of our members and supporters ski within the Thompson Pass Special Use Area and are very interested in winter recreation on these state lands. These skiers would like to see some change to how winter recreation is managed to protect opportunities for human-powered winter recreation on Thompson Pass. Winter Wildlands Alliance works with local skiers across the country to advocate for non-motorized zones designed to protect opportunities for human-powered winter recreation and we believe that the Thompson Pass Special Use Area is in need of this type of management.

In terms of recreation opportunity, snowmachine and helicopter use adversely impacts the recreation experience sought by many nonmotorized users, while the reverse is rarely true. Motorized recreation will displace nonmotorized users where use is heavy. This has occurred numerous places. Where displacement does not occur because of the high level of demand for a particular area or a lower density of snowmachine use, conflicts among users still arise, and can be substantial.

Conflict between winter recreationists often occurs because snowmachines and other over-snow vehicles (OSVs) substantially impact the recreation experience of non-motorized users. These impacts include noise, exhaust, consumption of powder snow, and safety in avalanche terrain. By analyzing and understanding each of the impacts, the Department of Natural Resources can enhance opportunities for nonmotorized winter recreation while maintaining a fair balance of motorized recreation opportunity.

The primary impacts that motorized recreation brings to bear on non-motorized recreationists are: noise, emissions, resource competition, and safety. These impacts are described in more detail below:

1. Noise Snowmachine noise is one of the biggest sources of use conflict, as an increasing number of winter recreationists seek out the peace and quiet found in the backcountry to escape the sounds of modern busy life (Abraham et al. 2010). Noise from motorized recreation is a particular problem in winter, when all use is restricted to a relatively small number of plowed access points.

Natural soundscapes have been found to assist in providing a deep connection to nature that is restorative and even spiritual for some visitors (Freimund et al. 2009, pg. 4). When users have these expectations, the mechanical noise of snowmachines or helicopters can result in a substantial diminution in their recreation experience. This can negatively impact the experience of the recreationist, create conflict, and ultimately lead to displacement (Gibbons and Ruddell 1995, Manning and Valliere 2001, Vitterso et al. 2004, Adams and McCool 2010).

In multiple-use areas, snowmachine and helicopter noise can be difficult to escape. While dependent on speed, type of machine, and direction of wind, snowmachine noise can travel up to 10 miles (Hastings et al. 2006, Burson 2008) a distance farther than most non-motorized recreationists travel in a day.

2. Emissions Anybody who has spent time near snowmachines is familiar with the blue haze of exhaust that trails two-stroke machines and hangs over staging areas.

A two-stroke snowmachine can emit as many hydrocarbons and nitrogen oxides as 100 cars and create up to 1,000 times more carbon monoxide (EPA, 2002). Snowmachine emissions contain dangerous levels of airborne toxins including nitrogen oxides, carbon monoxide, ozone, aldehydes, butadiene, benzenes, and extremely persistent polycyclic aromatic hydrocarbons (PAH). Several of these compounds are listed as "known" or "probable" human carcinogens by the EPA. Benzene, for instance, is a "known" human carcinogen and several aldehydes including butadiene are classified as "probable human carcinogens." All are believed to cause deleterious health effects in humans and animals well short of fatal doses (EPA 1993). Winter recreationists are especially at risk because the concentration of these emissions increases with elevation and cold (Janssen and Schettler, 2003).

3. Tracking of the Landscape and Consumption of Powder Snow Competition for a limited resource - untracked powder - is one of the most common causes of user conflict in the winter backcountry. Skiers, snowboarders, and snowmachiners all enjoy riding in untracked powder snow. However, snowmachines track up the landscape at a rate twenty or more times faster than human-powered recreationists, and in doing so they eliminate the recreation opportunity that skiers and snowboarders seek. The severe rutting that snowmachines leave on a slope can also be dangerous, especially when a skier or snowboarder is descending or turning at speed. With increased demand for backcountry alpine skiing and snowboarding, powder snow has become a precious resource that merits intentional and proactive management.

As is apparent at any ski resort on "powder days", the experience of descending steep slopes blanketed with smooth powder is highly sought by many skiers and snowboarders. In the backcountry, the experience of skiing or riding powder snow often is the primary reward for the strenuous effort of climbing up without a chairlift or helicopter. Accessible backcountry powder snow on steeper slopes is a limited resource, and a significant impact of OSVs is their disproportionate consumption of this resource. Due to its power, size and speed, one snowmachine can in a matter of hours completely consume all the powder snow on a slope that could otherwise provide recreational opportunity for twenty or more skiers and snowboarders. Likewise, a helicopter can fly a group of skiers to the top of a peak and they can track up the slope in much less time than a human-powered skier can climb, much less descend, the same peak. Acknowledging and addressing this disparate impact is critical to managing road-accessible areas on Thompson Pass.

4. Safety There are too many people in the backcountry today to safely allow an unregulated free-for-all. While it is true that there is an elevated risk any time anybody travels into the backcountry whether under their own power or aided by a snowmachine or helicopter unregulated motorized use mixed with pedestrian use, all within avalanche terrain, is a recipe for disaster. While safety concerns can be addressed through education, in areas where winter recreation is highly concentrated it is necessary to zone the backcountry. Just as it is common sense to separate pedestrians from motor vehicles in other contexts, it is important to provide pedestrians (skiers and snowboarders) with a non-motorized area to recreate in the backcountry.

Many skiers have had the unfortunate experience of a snowmachiner riding up to and above them on a steep slope. Many others have had negative encounters with helicopters. While these instances can likely be attributed to 'bad apples' within the motorized community, they occur often enough to necessitate the creation of a non-motorized zone where human-powered skiers and riders can recreate.

Proposed Non-Motorized Zone A number of local Thompson Pass skiers have proposed a non-motorized zone within the Thompson Pass Special Use Area. Zoning areas for different forms of winter recreation is not unprecedented in Alaska - two of the premier winter recreation destinations in the state are zoned to balance motorized and non-motorized use. On Turnagain Pass a road is used as the delineating boundary to separate uses and at Hatcher Pass motorized and non-motorized zones are defined by topographical features. By creating winter recreation zones that separate motorized or non-motorized use, land management agencies can proactively manage conflict and protect historical recreation opportunities.

The proposed Thompson Pass non-motorized zone starts just to the north of mile 34 and extends to the north end of Rice Mountain. This area does not see substantial snowmachine traffic and offers a much better recreational experience for non-motorized users than for motorized users. By designating this area as non-motorized the DNR would preserve an area for human-powered winter recreation without affecting the motorized recreation opportunities on Thompson Pass.

A map of the skier-proposed non-motorized zone was provided to DNR by at least 50 different individuals who responded to the Thompson Pass Special Use Area survey in April 2016. In addition, this map has been provided by a number of commenters in this comment period. I have provided this map as well, via email to Brandon McCutcheon, Charles Pinckney, and Tyler Fanning on April 29, 2016.

Thank you for considering these comments. Sincerely, Hilary Eisen. Attachment - Map TPSUA Non-Motorized Zone.

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Comment 22 of 86 - submitted on 04/10/2016 at 05:40 PM: Please keep the Denali Highway piece in the plan. Make it part of an eventual Tangle Lakes State Wildlife Refuge. Do not use it as a settlement area or for mining activities. This area is critical habitat for plants and animals and is important for hunting, berry picking, photography, and recreation.

Any settlement should be in the best interest of the community. DO NOT allow any mining to go on in any areas. Before adding any settlements or agricultural land offerings research water availability and make sure it is available. Also, do not put any settlements in permafrost areas. When the land is cleared it melts the permafrost, disrupts plant life and creates a mess. Make sure any settlements have south-facing slopes, good soil, little wetland, minimal fire danger, good potential, existing access.

Do not remove the E-W strip along the Area's south boundary (east of Thompson Pass). This is also critical habitat and where people hunt, berry pick and recreate. Do not allow any settlement in this area. It could block access to these activities.

Thank you.

Comment 23 of 86 - submitted on 04/25/2016 at 12:00 AM: The plan revision should designate a reasonable number of areas and trails that are suitable for quiet recreation and should be closed to motorized recreation.

Statewide, there is a gross imbalance on the state and federal public lands between the many areas and trails managed for motorized recreation, and the relatively tiny number of areas and trails managed for quiet, non-motorized recreation. This is certainly true of the Copper River Basin. Virtually every acre and trail on the State, BLM, and National Park Service managed public lands are open for recreational snowmachining, and only a very small portion are closed to summer ATV travel.

Fairness to the many Alaskans and visitors who are seeking a quiet outdoors experience; balanced land management; true multiple use management; and responsible stewardship of resources including wildlife and fisheries, clean air and water, scenic beauty, soils and vegetation, wildlands, and natural sounds and natural quiet (the natural soundscape) dictate that the State should designate areas and trails closed to motorized recreation.

The State should treat the Natural Soundscape like any other resource, such as clean water, and should seek to maintain, and where appropriate, restore, natural quiet and natural sounds. It should develop a Soundscape Plan that identifies a baseline and provides for periodic monitoring.

Sincerely

Comment 24 of 86 - submitted on 04/22/2016 at 12:00 AM: Please consider my requests to support the following regarding the Tangle Lakes area:

Close the viewshed of the Denali Highway within Unit 28 to new mineral entry (claims staking or leasing).

I recommend that the viewshed of the Denali Highway within Unit 28 be part of a future Tangle Lakes State Wildlife Refuge.

Thanks you for your consideration, Kind regards

Comment 25 of 86 - submitted on 04/28/2016 at 02:58 PM: Regarding the snowmachine issue at Thompson Pass - I think they should still be allowed to operate in all areas of the pass. There are other places in the state - notably Wrangell-St. Elias National Park where skiers can go to get some quiet turns in. Many skiers use snowmachiners to access the terrain. If this issue will be addressed, it should be addressed equally in the Prince William Sound Area Plan since only half of the pass is covered in the Copper River Basin Area Plan. I am a snowboarder myself and have used snowmachiners at the pass to get to some incredible places I would have never gotten to just alone on my split board. The Chugach is such a huge mountain range to explore - there are some areas I have been that are great for ski touring that not many snowmachiners go already.

Comment 26 of 86 - submitted on 04/23/2016 at 12:00 AM: I strongly urge you to:

1. Close the viewshed of the Denali Highway within Unit 28 to new mineral entry (claims staking or leasing).
2. Include the viewshed of the Denali Highway within Unit 28 be part of a future Tangle Lakes State Wildlife Refuge.
3. Do your job- Protect Our Public lands, waters, wildlife, health & future. You work for citizens, Not industry.

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you

Comment 27 of 86 - submitted on 03/23/2016 at 06:07 PM: I enjoy Alaska's wilderness in my free time, and have also made part of my living guiding clients in our state, national, municipal, and wild lands. The land is a resource that should be shared because it does not belong to any single special interest group.

There are many groups who advocate for reducing access for certain segments of the population, and on the surface these arguments can appear reasonable. Some may argue about carbon footprints, but I imagine that they still drive to the trailhead, and maybe they even fly to ski destinations (one flight to Seattle has the equivalent carbon footprint of a 3500 miles of snowmachining). Others may argue about reducing tourist traffic, which could be via helicopter or just on foot. These arguments are made by people who believe that they are superior and therefore that they deserve special rights rather than share the land with others.

If we set a precedent that limiting access to specific user groups is a reasonable practice, what would be the limit? I think a lot of people don't enjoy dog poop so maybe all dogs should be banned as well. Slow hikers and skiers obstruct trails, so maybe a fitness test should be required before people can use certain "enthusiast" areas. Of course, there is also a lot of talk about avalanche hazard, so maybe we shouldn't let anyone use the backcountry who doesn't have at least a bachelor degree. These arguments are the same as requesting that motorized usage should be banned. Unfortunately, there is only one loud group that is great at organization and zealous in their superiority...

A snowmachiner is to a backcountry skier what a hyper-fit backcountry skier is to a newbie snowshoer. This is Alaska, if we cannot handle sharing the massive amount of space that we have with others, then maybe the answer is to look a bit harder for space rather than ask for policing.

Sincerely, Brian Gehring -splitboarder, tele skier, occasional climber, snowcave camper, and snowboard snowmachiner

Comment 28 of 86 - submitted on 04/28/2016 at 12:00 AM: Thank you for the opportunity to comment on the Copper River Basin Area Plan. Please accept these comments on behalf of Earthworks, a national non-profit organization, and our Alaska members who recreate in the region.

We urge the planning team to maintain the Tangle Lakes State Wildlife Refuge and the surrounding region, as a great place to hunt, fish, recreate and sightsee by protecting its important wildlife habitat and scenery. With that in mind, we ask the team:

1. To close the viewshed of the Denali Highway within Unit 28 to new mineral entry (claim staking or leasing).
2. To recommend that the view shed of the Denali Highway within Unit 28 be part of a future Tangle Lakes State Wildlife Refuge.

Please add my contact information to the list for future notice of this planning process.

Thank you

Comment 29 of 86 - submitted on 04/29/2016 at 12:00 AM: Thank you for taking comments on the Copper River Basin Area Plan Revision.

I have been a full time and/or part time resident of the Copper River Basin since 1991. I cherish the area for the opportunities for quiet wilderness experiences. In addition to being a landowner and resident, I was a wilderness guide for 15 years. I have seen both recreational and residential use of our wild areas grow immensely during the past 25 years. I have also witnessed the spread of invasive weeds, and the encroachment of noise into every remote corner of the Basin.

I hope that the new plan consider:

- setting aside areas for quiet recreation and visitation. This includes limiting snow machine and helicopter use.
- limiting the creation of new trails, closing some current un-official trails to limit the spread of invasive species.

- allocating funds and attention towards mitigation and prevention of invasive species.
- being attentive that new residential land sales do not impact water or wildlife resources
- maintaining trash and outhouse facilities for visitors, who will put unsightly and unsanitary pressure upon our roadside scenic areas if facilities are not present.

Thank you again for considering my comments.

Comment 30 of 86 - submitted on 04/28/2016 at 12:00 AM: As the Planning and Zoning Commission for the City of Valdez, we are concerned that the residents of Valdez, a large user group of state lands in Thompson Pass, may have been inadvertently missed in the public scoping meeting held in Valdez. The meeting times and locations were not published in a local newspaper in Valdez like they were for Glennallen and the surrounding communities. Although the City of Valdez is technically outside of the planning area, the only road-side access to our community is directly thru the Copper River Plan area. Management of these lands does and will continue to impact our residents for access, recreation, subsistence, habitat, and forestry.

As the CRBAP incorporates the North portion of Thompson pass and DNR is seeking input on how state lands are used and how individuals/communities would like to see them in the future, we recommend reaching out to the residents of Valdez- with a population of about 4,000- via newspaper to allow for the equal opportunity of input.

As activities on state lands in Thompson Pass have increased and patterns have changed, we recommend that Thompson Pass- a state designated recreation area- be considered for a specific management plan to be drafted concurrently with the CRBAP.

Your consideration of our input is greatly appreciated. Thank you for your time,

Sincerely

Comment 31 of 86 - submitted on 04/29/2016 at 11:54 PM: I'd like to see a non-motorized area in TPSUA. I think heli-skiing operations need to be permitted and limited.

Comment 32 of 86 - submitted on 04/29/2016 at 12:00 AM: Boundary adjustments:

The Thompson Pass Area that is used for heli-skiing and backcountry snowmachining and skiing needs to be all within one plan. It appears that it is going to be split with a line right down the middle of the Pass instead of encompassing all of that area. The boundary for the Copper Basin Area Plan should be extended to include all areas in the Thompson Pass region that have active recreation taking place so that recommendations for that area are consistent and cohesive in one planning effort. The region operates as a whole and it would benefit it to be planned for as a whole area rather than fragmented.

The Denali Highway region and Tangle Lakes are an important part of Copper Basin residents' hunting and recreational activities. Please include the land along the Denali Highway from the MacLaren River east to Paxson in the Copper Basin Area Plan. It is an important wildlife and recreational resource that would benefit from cohesive and consistent prescriptions that are outlined in one document rather than split between two. Copper Basin residents are big stakeholders in this area and would like to see it included in this planning effort as there is active mineral exploration in the area as well as the hunting of the Nelchina Caribou herd. This area needs active and current management prescriptions.

Land Status and State land Selections:

The current preliminary planning map has very confusing land status as it shows that the State has selections over top of unencumbered BLM land within the TAPS corridor as well as selections that overlap WSR corridors. This makes it seem there are more lands selected than can be. The planning effort should clearly outline priorities for State selections and the process to complete the conveyance of these lands to the State. State selection priorities should focus on blocking up areas of State land to simplify the land status for the users of the land and also provide opportunities for blocking up and consolidating lands for other management agencies. The more straight-forward the land status the better for Alaskans.

I support a BLM managed TLAD region south of the Denali Highway as well as BLM managing land with the Sourdough Controlled Use area between the Gulkana WSR and the TAPS corridor to consolidate land management. Relinquishing these selections makes sense for Alaskans and local residents who use the area for hunting and recreation.

Thompson Pass Area:

This area needs prescriptions that are consistent and coordinated with surrounding land managers and provide for a diversity of recreational experiences (non-motorized and motorized) The heli-ski activities in the region need to have some clear goals outlined for limits/carrying capacity to the number of operators for safety in the air traffic. This region, I feel, needs a more specific plan in the future that is outside the scope of the Area Plan. Please keep this in mind and provide the tools for the development of more specific prescriptions in future planning and coordination efforts.

Land Sales:

New areas open to land sales should make sense to develop with regards to access, water, and land type. Rights of Way need to be established before opening an area to development. New subdivisions should keep in mind providing easements to access rivers, lakes, or other common areas of interest within the subdivision. Please focus on areas that are already subdivided and accessible before creating new ones out of swamp.

Forestry/Fire:

Coordinate forestry operations with other land managers in the area. I support the creation of more personal use firewood gathering areas, particularly those accessed in the winter months.

There is a need to maintain firebreaks around populated areas and this should be coordinated with the multi-land managers. Particularly around the Glennallen area where fuels are high.

General Comments: I support the idea of a wildlife refuge / special designation in the Tangle Lakes area for the Nelchina Caribou herd and recreation activities.

I do not support the idea of a road to Cordova along the Copper River. I would support a Rails to Trails route to Cordova along the old Copper River Railroad bed.

Klutina Lake Road/Brenwick Craig Road (State RS2477, BLM 17b, Ahtna route) needs to remain open to the public.

Public waysides and toilet facilities need to be maintained and remain open to promote tourism in the region.

Mineral exploration and development should stay away from the view sheds of the Denali Highway, in particular, but also other tourism resources that we have.

The quality and quantity of our water resources is of utmost importance and should be at the forefront of any decisions that could impact them.

Support efforts to inventory waterways for inclusion into the anadromous stream database.

There needs to be coordination between multiple land managers on all topics affecting wildlife and habitat.

In areas with a high concentration of motorized use there needs to be comparable opportunities for non-motorized users as well.

Comment 33 of 86 - submitted on 04/28/2016 at 06:19 PM: I moved to Valdez to enjoy full an unregulated recreation opportunities in the surrounding Chugach mountains and the prince William's sound. I have seen backcountry use expand in both scope, distance , and user numbers. I recognize that there is a lot of social, political, and ideological conflict at times between users. But, when you look at the facts the increased number of recreational users from both commercial and non- commercial backgrounds , both mechanized and non- mechanized, both locals and visitors have not produced a single accident or fatality. I have also recreated in other parts of the state where policies and politics dictate where you can and can't go while operating commercially or in with a mechanized approach to access. In areas like Turnagain pass for example where snowmobiles are limited to road side access via an east/ south east aspect there are many more accidents. This is true in areas like Haines as well. Haines has significantly less heli ski operations but a greater fatality and accident rate within the industry. I heli- guided there and believe the politics and policies that dictate mountain practices and commercial protocols have played a roll in these accidents. Heli-skiers, ski tourers, snowmobiles, and winter enthusiasts have been recreating in these areas together for over 25 years without any significant accidents or incidents due to user conflict. I see this as testament to the lack of need for delegating separate user areas in the Thompson Pass corridor . Mountain savvy users know that dynamics in the wind, temperature, aspect, and snow pack already dictate and limit where users should recreate to ensure safety. When you complicate this complex matrix of elements with politics and restrictions it forces the backcountry user to make choices that go against natures warning system. Then you have recreational users approaching from the wrong aspects, forced into areas they would likely not have chosen based on conditions, and funneled in higher concentrations in smaller areas. This not only effects safety and the recreational experience; it also places a larger burden on the area and environmental impact . There is also the economic impact that restricting or limiting user access would have on our local and statewide economy. The mechanized users rent rvs, buy gas, oil, snowmobiles, gifts, and groceries. They eat at restaurants, and rent hotel rooms. I have lived in other small towns like Seward where similar snow and mountains exist without much winter tourism. These towns shut down most of the hotels and restaurants after summer ends and there very few jobs for locals during the expensive winter months. Their populations are cut in half in the winter and job opportunities are cut even deeper. Access is already so limited in the Chugach range with the lack of roads and infrastructure. Please don't limit the access from the roadside and make these difficult and complex recreational and commercial endeavors more convoluted and dangerous. Sincerely, Sunny Hamilton

Comment 34 of 86 - submitted on 04/29/2016 at 12:14 PM: Please make view shed of Area 29 part of Tangle Lake Recreation Area. No mining in the Recreation area.

Comment 35 of 86 - submitted on 04/29/2016 at 04:32 PM: Forgive me if I submit two comments by accident, I'm not sure the last one was submitted.

I support including the lands surrounding Tangle Lakes and the area seen from the Denali Highway between Paxson and the Maclaren River in a state wildlife refuge in the near future.

Please consider limiting mining activity and new claims to lands not seen from the Denali Highway. I believe the lands within view of the Highway are more valuable to attract tourism and recreation dollars to the state's economy.

Comment 36 of 86 - submitted on 04/29/2016 at 09:17 AM: I love visiting the tangle lakes area. I visit close to three times a summer. I have yet to explore it with my snowmachine in the winter but aim to. I hope that this amazing landscape that is readily road accessible is preserved for my son as he grows up. I support that the viewshed of the Denali Highway within Unit 28 be closed to new mineral entry. I also support that the viewshed of the Denali Highway within Unit 28 be part of a future Tangle Lakes State Wildlife Refuge.

Comment 37 of 86 - submitted on 03/21/2016 at 09:33 PM: Good evening, I am an avid user of the Thompson pass area for snomobile recreation. Myself and a group of friends enjoy multiple trips each winter to the pass some lasting over multiple days. During these trips we enjoy traveling to many of the various valleys and glaciers.

Please keep motorized use a priority for the recreation plans in the future.

Comment 38 of 86 - submitted on 04/29/2016 at 10:39 PM: I want to thank the State planning team of Tyler, Chuck and Brandon for their effort in coming to the Copper Valley with their planning presentation. These are my comments concerning settlement areas:

1. Good, well-drained building ground, with, if possible, a southern exposure or good view.
2. Easemented access to the lots should follow good, practical, economical road building locations. Should lots be accessed by water, a practical parking area for cars and trailers must be provided.
3. Lots should provide privacy and be at least 5 acres in size. To maintain privacy, each lot should have a 20-foot, non-disturbed setback (no brush or tree removal) from side lines (this would make for a 40-foot wooded area between structures on adjoining lots. This non-disturbed setback area should not apply in areas of the lot designed to view a particular mountain or body of water. The surveyor of the lot should give special attention to locating lots to accent view potential.

4. The goal of each lot should be to provide the owner good 'pride of ownership', such that many people would desire to own the lot. This ensures its proper development at some point in the future. Many lots in previous Copper Valley subdivisions consisted of poor land and/or had extremely expensive or impractical access. Consequently, many of the lots remain unused, not built on, or contain abandoned structure eyesores, even after 30+ years.

5. Beautiful private ownership land will make for a strong and involved Alaska resident. The State must continue ensuring good private ownership land is made available, even in the face of opposition from some state residents.

6. To help ensure successful subdivisions, the planning team should ask for knowledgeable, local volunteers to make onsite subdivision observations with the planning team or surveying team to give local feedback and suggestions regarding potential subdivisions.

7. The State should work with area residents to identify specific areas for settlement.

Comment 39 of 86 - submitted on 04/29/2016 at 12:31 PM: Thank you for holding the public meetings in the Copper Valley area in late March. My comments regard future offerings of state land for private settlement: Please offer some property that is on good building ground (i.e. well-drained and not on permafrost), has view potential which creates pride of ownership, and lot sizes that are at least 4-5 acres. Access needs to be on ground where road building is not cost-prohibitive. Many past state subdivisions in the Copper Valley are situated on poor ground, and the cost to construct access roads has been so high that land purchasers cannot afford both home construction and road-building costs. Consequently, access "roads" often become unusable muddy ruts. Without practical access, start-up properties are later abandoned in an unfinished condition, causing the entire subdivision to be viewed negatively, while representing little positive value within the community. Please don't allow this to happen again in the Copper Valley. Thank you.

Comment 40 of 86 - submitted on 03/26/2016 at 07:38 PM: I would like to see a non-motorized backcountry zone for Thompson Pass. The high number and multiple types of users from mid-February through the end of April creates safety concerns. Avalanches in high use areas are the main concern. Helicopters often inadvertently (?) drop clients above backcountry skiers or snowmachiners traveling uphill, despite potential avalanche risks. Snowmachiners occasionally highmark above backcountry skiers.

My suggestion is a non-motorized zone that includes Mount Diamond, Mount Billy Mitchell, and Mount Tiekel. Additionally, a 6-mile buffer along the highway corridor prohibiting helicopter landings would increase safety and mitigate conflicts between user groups. Thank you for your consideration.

Ken Hill Fairbanks, AK

Comment 41 of 86 - submitted on 04/28/2016 at 10:35 AM: Please help us protect non-motorized use in Thompson Pass! There is room for all of us if managed correctly.

My proposed solution:

1) require that helicopter skiing stay off of the road-corridor accessed runs 2) divide between motorized and non-motorized areas using the road as the dividing line. easiest way to do this would be to swap sides based on the day - even day motors on one side, odd days motors on the other side.

This solution provides for safety of users and allows both user groups access to the lands, just not on every day. In my mind, this is the 'everyone wins' scenario.

Thanks for considering!

Comment 42 of 86 - submitted on 04/28/2016 at 07:54 PM: I've been backcountry skiing on Thompson Pass and in the TPSUA since 1998 and have owned property nearby at the Heiden View subdivision since 2009. I primarily ski tour, but also frequently use one of my 3 snow machines in the TPSUA.

My primary concern with the TPSUA at this time come from safety concerns with the heli ski industry. For example on March 27, 2016 I was parked at 61 degrees 7.973 north 145 degrees 17.987 west, which is within the TPSUA. 30 minutes after our arrival, a Valdez Heli Ski Guides helicopter landed on a slope directly above myself and 2 friends. The guide dug a pit on the slope, at which point it became apparent that they were intent on skiing it. We evacuated the area when the first skier was halfway down the slope.

It is common among backcountry users, especially professionals, that only one person is on or in the runout of a slope at a time. Observing this, the crew of VHSG guides and clients proceeded to ski the slope one at a time and continued past our location to a safe zone. They maintained safety protocol amongst their group but did not extend us this courtesy.

I was angered by this incident of willful and reckless endangerment by a commercial user, and started by calling the chief guide at VHSG, who happens to be a friend of mine. I was able to discuss this incident with the guide involved, also a friend of mine, and he was incredulous that he had done anything wrong, stating that they had decided to ski that run at their morning meeting and that they had waited for us to move but then decided to ski when we remained in our original location.

Not being satisfied with this answer, I contacted Jess Meybin of the DNR. After corresponding with several emails, she stated that the DNR has no ability to regulate the heli ski industry beyond their use of overnight camps or installations.

My proposal for the TPSUA is for the DNR to create a permit system for commercial heli ski users that includes some obligation for them to yield to the public, and to follow basic safety protocol including not operating above existing parties. There needs to be an avenue for the public to report violations. This area has become too busy for commercial users to continue to abuse the anarchy they've preciously enjoyed by putting the public at risk.

Second, I oppose the Tailgate festival and would like to see it discontinued. Over the past few years the event has increasingly left a mess behind and had more of a hardcore party atmosphere with heavy drug use. It does not have a place in the TPSUA.

I support a non motorized zone in the TPSUA if consensus can be reached among users. Specifically, I would like to see helicopters prohibited from operating in the road corridor.

Comment 43 of 86 - submitted on 04/28/2016 at 12:00 AM: 1. Please close the viewshed of the Denali Highway within Unit 28 to new mineral entry (claims staking or leasing).

2. Please recommend that the viewshed of the Denali Highway within Unit 28 be part of a future Tangle Lakes State Wildlife Refuge.

Thank you

Comment 44 of 86 - submitted on 04/29/2016 at 10:58 AM: I use the Tangle Lakes and Denali highway area every year, to watch wildlife, hike, canoe, and fish. I have done this for 20 years. I would love to see this area protected from further mineral exploration and development. I support this area becoming a State Wildlife Refuge.

Thank you. Karen Jensen

Comment 45 of 86 - submitted on 04/12/2016 at 04:23 PM: I attended the public meeting on the plan in Copper Center. After a quick review of the plan, it appears significantly out of date. Here are my preliminary comments:

1. Many of the lands in this planning area adjacent to the highway corridors are used by Copper Basin residents for subsistence, fishing, hunting, trapping, outdoor recreation (winter and summer, motorized, nonmotorized and on foot). They are important areas for local people as backyard parks, places to exercise, and spend time with family and friends. They are also utilized by summer visitors, who stop in our communities and are often looking for a place to get out and walk. Our communities are small, but vibrant and alive. So much land has been transferred into private ownership that it is hard to find a public place to get out and recreate legally. Since state lands are not signed, it is even more difficult.

2. Access to the Copper River is very difficult for a nonmotorized boat. Currently a raft can put in on the Gulkana River (at the state highway bridge north of Glennallen) or at the Tazlina River bridge on the Richardson highway bridge, but there is no public takeout on the river until Chitina. Additional access is critically needed, for both local residents and general public visiting our area.

Small parcels of land in these areas, as well as lands returning to state ownership, should be evaluated for retention for public enjoyment/park areas. Any lands identified for disposal should be considered in the context of surrounding land uses, and every effort made to avoid conflicts between existing and new owners.

3. Large recreational lakes important to local communities have very limited access because of past aggressive land disposal programs at the state and federal level. As a result, access to Klutina and Lake Louise lakes has become severely restricted. Similarly, land disposals along rivers, combined with limited trail or road access on rivers, has made many of our area rivers inaccessible, despite being state-owned lake and river beds.

4. Recreation sites identified in the previous plan have been lost to the public through lack of maintenance and removal. Examples include Squirrel Creek Trail and the recreation site/campground at the Little Nelchina River /Glenn Highway. This needs to be corrected. Residents and visitors to our area would use these sites if they existed.

5. State lands along the Richardson highway corridor near Paxson, as well as the Summit Lake and Alaska Range, are heavily used by motorized and nonmotorized recreationists, year round. Most use currently is from Alaskan residents but signing and information would make these areas accessible to out-of-state visitors as well.

6. Thompson Pass is an incredibly important recreation area for Alaskan residents, as well as out of state visitors. Additional facilities (trailheads, trails, parking areas, boat launch areas and signage) are needed.

7. In general, some low-key infrastructure development (signing state lands, trailheads, off road parking areas, trails, boat launch areas) would go a long way to help Alaskans access state lands.

Comment 46 of 86 - submitted on 04/25/2016 at 12:00 AM: Please close the view shed of the Denali Highway within Unit 28 to any new mineral claims staking or leasing.

Also, as I have testified before, please convert this same view shed into a State Wildlife Refuge to protect its unique resources for future generations.

Thanks

Comment 47 of 86 - submitted on 03/30/2016 at 12:27 PM: I would like to see a non-motorized area established on Thompson Pass. While I support motorized use of the pass, it is also important to provide non-motorized recreational opportunities. A non-motorized area will allow for those who do not have or choose not to use motors an opportunity to enjoy and use their public land without having to compete with or manage safety hazards concerning motorized users. A non-motorized area will ease, and potentially eliminate, motorized/non-motorized conflict. Turnagain Pass provides an example of successful designation of non-motorized and motorized areas on public land.

Comment 48 of 86 - submitted on 04/28/2016 at 12:00 AM: - Remote recreational cabin sites should not be in areas that are already important to hunters, fishers, and recreationists.

- Klutina Lake is prime bear habitat and is well-used by bears. This makes it unsuitable for settlement. Klutina Lake should remain public because of its heavy use by fishers, hunters, and Recreationists. But not recreational use area. Or land sales in the Klutina area. I use this area for recreation such as fishing and berry picking and root harvesting of medicinal plants.

- Tazlina and Klutina lake areas should be protected from human inhabitants so that the wildlife can prosper and thrive for hunting. When houses are put into area where herd cross they will no longer cross there.

- Maintained outhouses are a necessity for sanitation and for encouraging a tourism industry that will be a source of local businesses and job. Consider small contract outsourcing to maintain these

- 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. Those people who haul water and those who do have good wells are anxious to protect quality and quantity.

- 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.

- Balance is needed between motorized and non-motorized uses of the land.
- A road link to Cordova (the old Copper River Highway idea) should be removed from the plan
- A mechanism is needed for the State, BLM, Ahtna, and Chitina Native Corp. to collaboratively keep track of all anticipated 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.
- The potential for spreading invasive species of plants should be a consideration in framing all goals and policies
- The Alaska Department of Fish and Game should be heavily involved in this planning process
- Agriculture land sales should be of various sizes to promote local and regional self-sufficiency or larger markets; they should be suitable for crops that will grow well in our changing climate, and (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.
- Land should be reserved for neighborhood and community trails and parks or greenbelts or open spaces
- Land sales should not impair public access to hunting and fishing areas; e.g., ridges that lead to sheep country, or creeks with grayling, or any other habitat for animals.
- Denali highway and Paxon road areas are used for hunting and berry picking and medicinal plant harvesting.
- McCarthy road should be looked at for safety. It is also used for hunting and the lake area is used for fishing. Camping too
- O'Brien creek road should be looked at for safety
- More signage of what vast environments are in our region, volcanos, swamps, minerals, plants.

Comment 49 of 86 - submitted on 04/29/2016 at 08:33 AM: Dear CRBAP,

I would like to voice support for a non-motorized corridor along the road in Thompson Pass Special Use area. I am a property owner at Mile 46, and am a frequent visitor to the area, year-round. Thompson Pass is an amazing place to be throughout the year, but especially in winter. One could argue that it is the greatest, largest backcountry ski area accessed by a road in the world. As a result there are a number of helicopter companies, snowmachiners and backcountry skiers that devote time, money and their energy here. The prime season is March and April, due to factors such as weather, daylight, snow depth, and avalanche risk.

I believe that non-motorized users should have the right to recreate quietly and safely in Thompson Pass. Non-motorized recreation contributes much to our economy, aside from the healthy and environmental benefits. The precedent has already been set in Summit Pass, Turnagain Pass, and Hatcher Pass Special Use Area.

Safety is one of my biggest concerns, as the threat of avalanches is significant. I have personally witnessed poor judgement that has put myself and my partners in danger.

I would also like to comment on the lack of sewage and waste management in TPSUA with events and large groups. There are no restroom facilities. This is unacceptable, as human feces surrounds the parking venues after these groups leave.

Thank you, Sincerely, Anthony Larson

Comment 50 of 86 - submitted on 04/26/2016 at 12:00 AM: Thank you for coming to Valdez and making a presentation, providing maps and allowing time for discussion.

Comments are about the state land North of the Tok Cutoff, with access near Chistachena.

If you look at older state maps you will see the town of Dempsey, which is located on the north side of the Tok Cutoff. At times, access has been from near Chistachena.

Dempsey was one of the '98 Gold Rushers who was the son of a Cherokee Plantation owner and a negro slave. He was one of the few gold rushers who had actually done prospecting before (in Colorado), could read and write, and helped the illiterate prospectors to file their claims. In 1898 he made claims in this area, then returned to Valdez and told other prospectors of the location, i.e. he was a prospector's prospector not a prospector filing for absentee members of his own family like Hazelett. After Valdez became "society conscious" (around 1903) Dempsey was made to feel unwelcomed (although he had served on the town council, built the reading room, church, and relief stations on the glacier). He moved to his claims in this area and lived there permanently until he died in 1915, when he drowned crossing the river.

I think it would be great if access to this historic area could be opened up with a trail route to the Dempsey mining area. I know some people have flown in. Signs should be placed along the highway and some historical/geological interpretive information there or in the Dempsey area.

If you want more information, I suggest you contact Andrew at the Valdez Museum. He is the archivist and has thought of writing an article on Dempsey. Dempsey is briefly mentioned in Lethcoe, History of Prince William Sound., p. 65.

Comment 51 of 86 - submitted on 04/28/2016 at 07:00 AM: I support a Tangle Lakes State Wildlife Refuge. Please keep the region a great place to hunt, fish, recreate, and sightsee by protecting its important wildlife habitat and scenery. Do not allow any mineral entry or development of any kind within the view shed of the Denali Highway. This view shed ought to be part of the Tangle Lakes State Wildlife Refuge system. I drive, hike, bird, fish, and pick berries there every year. It is well worth preserving.

Thank you. Sherry Lewis

Comment 52 of 86 - submitted on 04/28/2016 at 09:10 AM: Ahtna, Incorporated does not support the Klutina Lake Remote Recreation staking program. 1) The proposed over 20,000 acres planned for this is well beyond the 500 acres to this program planned for in the CBAP. 2) There is no viable access to this area except by float plane. 3) In a recreation use survey completed in 2012, the recreational users of the Brenwick Craig road and Klutina Lake expressed their support of Ahtna, Inc. leaving this area in its pristine condition. They reported to Ahtna of the value they felt in being able to go back to an area visited 20 years earlier and seeing it in the same condition. Not all

areas have to be developed. Ahtna, Inc. would like to propose that any future land sales in the Copper River Basin provide adequate access to the parcels being sold, as done in the Mat-Su Borough. Most of the parcels of land already sold by the State of Alaska in the Copper River Basin are inaccessible. Providing only surveyed access routes is not adequate. The land might be being sold, but it is not being developed because of the access problems. The Copper River Basin is experiencing an acute shortage of firewood. The CBAP revision should look to finding areas of State land with stands of beetle killed trees to harvest for firewood for non-Ahtna shareholders.

Comment 53 of 86 - submitted on 04/27/2016 at 12:00 AM: Plan Boundary Expansions: Expand the plan boundaries to include:

- Near the Lake Louise area
- Thompson Pass
- Eastern Denali Highway

Specific Details

- Tangle Lakes State Wildlife Refuge should be created. An overwhelming purpose is to protect the Nelchina caribou herd habitat. The eastern portion of the area which is in Unit 28 should be included in the Refuge. - The viewshed of the Denali Highway within Unit 28 should be closed to new mineral entry, claims staking or leasing.
- Tonsina Lake and Tonsina Lake Trail should not be designated settlement due to its important public use resources.
- Klutina Lake should not be designated settlement because due to high public use values and is prime bear habitat and use.
- A non-motorized zone should be considered in the northern wooded area of Thompson Pass.
- Any road link to Cordova should be removed from the Plan.
- Willow Creek watershed should be protected from negative impacts to water quality and quantity.

Settlement

Land disposals privatize public land. Land use conflicts between traditional public uses and private use that excludes the public can result. The actual on the ground need for future land settlement must be considered. This has been suggested to DNR in many land management plan processes. But DNR does not follow through on this. Conducting a survey of the private land available in the area is important.

The carrying capacity of the land to support settlement must be considered. A carrying capacity figure should assume that every parcel that the state sells will eventually be settled for full time use. The cumulative impact of a settlement program along with other resource uses must be considered. This would apply to previous areas that were designated settlement. Keeping the settlement designation for those areas with consideration of re-opening land disposal must consider the cumulative impacts on the natural resources and the current resource use such as public trails, hunting and fishing.

Land disposals should avoid wetland areas because of degradation impacts. Water resources in the planning area can be scarce or limited for other reasons. Land disposals should not be created in areas with scarce water resources. Disposals should not create negative impacts on water quality and quantity for current water uses.

Forestry

Before a five year listing of timber sale process commences for commercial and personal use logging, DOF must inventory existing logging opportunities on private lands or other government agency lands. Inventory of current available logging efforts is necessary to conclude if logging on state lands is really necessary.

Climate Change

New studies have come out showing that old growth forests buffers the effects of global warming. Specifically, spatial models in studies reveals the microclimatic buffering capacity of old growth forests.

The value of an intact forest is imperative in this time of climate change. Shifting weather patterns are impacting fish, wildlife, habitat and plants. Lands that are NOT fragmented by roads and land-clearing human development are more resilient to climactic changes. Diverse natural forests form their own sheltering and buffering microclimates which slow the rate of change. Resident species have the time to adapt to climate changes. Resilient ecosystems can regenerate better after disturbances. They better resist and recover from pests, diseases, temperature changes, and water availability.

The Natural Capital of Public Lands

Natural capital "refers to the elements of nature that produce value or benefits to people (directly and indirectly) such as the stock of forests, rivers, land, minerals&as well as the natural processes and functions that underpin their operation. (From NATURAL CAPITAL VALUING THE PLANET by Dieter Helm)

The public lands of the Copper Basin are natural capital. The renewable resources of the public land ecosystems provide ECOSYSTEM SERVICES. Resource managers and the public need to practice the precautionary principle in land planning. They need to be risk averse when managing the renewable natural resources. Restoration is very long and difficult when it comes to ecosystems. Natural capital assets have thresholds which are biophysical resilience. But if the stock of the asset is depleted below sustainability, then degradation occurs.

Invasive Species

Land management policies should consider the effects of programs and use of natural resources has on the establishment of invasive vegetative species. There is controversy whether an invasive species is an environmental threat. Best management practices and public education must be encouraged in natural resource extraction and creation of access in order to prevent their establishment. We do not want to encourage herbicide use to control them.

Comment 54 of 86 - submitted on 03/31/2016 at 09:14 AM: Hello,

I have lived in Valdez and on in the Serendipity Subdivision for 15 years and recreate often in the Thompson Pass Special Use Area.

I have concern over the growing winter and spring visitation to Thompson Pass. The numbers of visitors of all types has grown exponentially for the last several years.

The Tsaina Lodge used to have 1 helicopter each season with a second helicopter backup for a few weeks of the season. This season, the Tsaina Lodge has 4 helicopters. The increase in snow machine traffic has created parking issues due to high numbers of large vehicles with trailers. More and more RVs of larger and larger sizes are setting up base camps on the pass for longer and longer periods of times. Backcountry skiers from the Anchorage and Mat-Su Valley have built ski cabins and now regularly play in Thompson Pass because of unsafe conditions and low snow fall on Turnagain Pass and Hatcher's Pass.

I support unregulated private user access to the pass that creates a culture of respectful and responsible travel in the mountains. I would like to see more education on recreating safely and respectfully between users.

More and more often I see people behaving unsafely in the mountains and jeopardizing the safety of other outdoor enthusiasts. One example from this season is snow machine riders cutting off a ski touring party on an established skin track and proceeding to loop directly above them and descend numerous times. I have even heard people bragging about doing this in parking lots. I am hoping that this type of behavior usually stems out of ignorance and not malevolence. I also witness skiers, both commercial heli-ski groups and other touring parties, descending steep slopes with people below them skinning up. I have encountered both snow machiners and ski touring parties traveling without backpacks, shovels, beacons, and probes. The level of safety and awareness has decreased substantially over the last few years.

I believe a regulatory presence on the pass could help solve the issue. One model that may work is creating a warming hut where avalanche information is disseminated and there are educational materials on respectful and safe travel in the mountain backcountry. Additionally, a regulatory authority will be a deterrent to inappropriate behavior and safety etiquette.

The building image of Thompson Pass is a place to come and party and play outside. I support playing outside, but do not want to see the pass develop a reputation as a destination to come and party. This type of behavior can become a safety issue on the edge of a highway. The current no rules, do as I wish, attitude evolving on the pass should be a red flag to all agencies involved in the area. For comparison, Arctic Man is a more remote event than Tailgate Alaska but Arctic Man has a considerable legal and agency presence. The Director's Decision on the Thompson Pass Special Use Area of 1994 (ADL 226446) speaks to the need to regulate commercial use of the pass and for annual meetings to inform the public and take public comment.

Each season there are more people camping on the pass and defecating in the snow banks near parking areas and pull outs. Every year as I am heading from my car into the backcountry my dog discovers human feces. It is becoming a public health issue. Most rental RVs are winterized and do not have functional restroom facilities in the winter because of freezing issues. In addition to human feces, people leave couches, trash, and broken machines on the pass when they leave.

When considering future management plans, regulations, and designated use areas, I urge you to consider the culture of behavior the event will help create on the pass. I would like to work towards creating a reputation as a place where respectful and responsible use of the pass is expected. I believe that, at the very least, Tailgate Alaska s permit should not be renewed until appropriate regulations are in place. Many aspects of the event have changed over the past five years and I believe the public should have opportunity to comment on the current climate and effect Tailgate Alaska has on the area. Further, if large expansive events like Tailgate Alaska will be permitted, I urge you to insist on a strict limited motorized zone that exists during the event and for the 4-5 days preceding and following the event. Currently, people come and camp for weeks before and after the event.

I am aware that the State is undergoing major budget cuts. One possible solution to this problem would be creating a nominal seasonal or annual parking pass system. Camping on the pass could require a fee and be limited to areas where there were bathroom facilities. Outhouses may need to be added as well. Specific parking areas for large vehicles or vehicles with trailers are needed to keep the highway safe as more and more users require parking and are being pushed out of the plowed pullouts and onto the highway. The increase in size of vehicles makes parking for the day a challenge. Maintaining the blueberry lake and Worthington Glacier campgrounds in the winter could help alleviate some of the human feces problems on the pass. Additionally, any festivals or events could be required to pay a per head fee or a percentage of the cost of the event. Heli-Ski operators can also contribute to the funding of a regulatory presence on the pass.

I believe that the State should be requiring more of commercial users of Thompson Pass Special Use Area. Considering the growing visitor rate of all type of winter enthusiasts and the profit the heli-ski operators are making off of public lands, these companies should be under more regulations. In order to support user increases, heli-ski operators need to be limited to skiing runs that do not terminate on the road. In other words, the terrain easily accessible by foot or snow machine needs to be reserved for the use of those without helicopter access. I realize that this will increase the cost of operation for commercial operators, however the cost can easily be passed onto the customer. Heli-skiing is luxury tourism. An increase to the user is not a deterrent to this type of visitor. I suggest either charging commercial operators a hefty permitting fee (to help support pass regulation), limiting usable terrain to areas not easily and readily accessible from the road, or both. Either one of these options would add costs to the commercial industry, but they would both alleviate some of the growing congestion and safety concerns on the pass. Public lands shouldn't be used for profit without some commercial contribution to the area.

I appreciate you taking these perspectives into consideration when considering new management strategies for Copper River Basin land management plan.

Sincerely,

Leigh Lubin

Comment 55 of 86 - submitted on 03/24/2016 at 05:22 PM: I am in favor of establishing a non motorized backcountry zone on Thompson Pass. I think the south side of the Richardson Highway from 34 Mile to 46 Mile would be ideal for this.

Comment 56 of 86 - submitted on 04/29/2016 at 12:00 AM: I urge closure of the viewshed of the Denali Highway within unit 28 to new mineral entry (claims staking or leasing) and recommend that the viewshed of the Denali Highway within Unit 28 be part of a future Tangle Lakes State Wildlife Refuge. I have climbed, skied, hiked and fished for over thirty-five years in this rare and beautiful area. Let's keep it unspoiled for future generations to savor.

Sincerely

Comment 57 of 86 - submitted on 04/29/2016 at 12:00 AM: Thank you for this public scoping process for updating the Copper River Basin Area Plan for State Lands. Following are my personal comments.

As a resident of Alaska for 70 years and of the Copper Basin for over 25 years, I have experienced and enjoyed Alaska's conveyed and selected state lands in a number of ways. Each of my occasional trips to other states reinforces my belief that Alaska is a very special place, and that what we have here has been lost in much of the rest of the country. Alaskans are fond of saying that Alaska is different, but too often we fail to protect those differences.

The natural resources which truly matter in the long term—the decades over which this revision is likely to last, and centuries beyond—are Alaska's scenery, its wildlife and their habitats, its fish runs, its forests and tundra, its clean air and water. When we keep public lands public and steward them well, these resources can remain, can be enjoyed by Alaskans and visitors, and can be used and re-used. This is why I believe it is important that planners be very careful about designating which lands—and how much in total—can be offered for sale or that can potentially have their renewable resource value impaired by the exploitation of non-renewable resources.

I do not mean that no land should be offered for settlement or agriculture. I am, however, concerned that the state—the Legislature in particular—is presently in a rush to sell off land, partly to bolster sagging finances and partly because "privatization" is a current political battle cry. We can expect these conditions to eventually change, and it could well be that ten years from now, public land and renewable resources will be more highly valued politically. The amount of land sold or industrialized should be carefully chosen. It should responsibly be limited in amount in order to avoid serious cumulative impacts.

In the scoping meetings, I was pleased to hear the list of criteria that you propose to use for evaluating settlement areas, including slope aspect, access, wildfire susceptibility, soils, water, and community desire. To that list, please add fish and wildlife habitat and existing hunting, fishing, and recreational uses. Lands that are especially important for wildlife and outdoor activities are not good candidates for settlement.

There is some good existing and potential agricultural land in the Copper Basin. This is another opportunity to avoid mistakes made in other states. Down there, industrial-scale monocropping predominates. This has resulted in the overuse of inorganic fertilizers and pesticides, to the detriment of fish, wildlife, water quality, and water quantity. After evaluating soils, hydrology, and other factors in order to determine the best agricultural land, some could be designated for offering agricultural plots (with agriculture covenants) of only a few acres, suitable for supplying a variety of crops for local or state markets. This would help make Alaska more food-secure and provide some local income.

When the original Copper River Basin Area Plan was being developed, ATVs were mostly clumsy three-wheelers. Four-wheelers were just coming on the market, and they were less powerful than today's. Snowmachines have likewise become more powerful. OHVs can go places they never could in 1986, and their use has increased exponentially. Those of us who enjoy hiking, cross-country skiing, and snowshoeing, either for recreation or as a means of access for hunting and fishing, are losing our opportunities to do so beyond the odor and noise of OHVs. Trails have become wide, muddy, and braided. Frozen rivers and snowy open slopes are crisscrossed with snowmachine tracks. This is a health issue, too: A couple generations of Alaskans haven't learned that they can travel by muscle power. State lands are badly in need of a fair balance between motorized and non-motorized uses. If you are prohibited from designating non-motorized trails and areas in the Area Plan, you should at least include "suitable for non-motorized designation" in Resource Management Summaries for some units or sub-units, and/or you could list some recommendations in the text.

Many of my comments reflect my concern about fish and wildlife populations and habitats. It is important that the Department of Fish and Game be thoroughly involved in creating the updated Plan, and their recommendations should be incorporated undiminished.

Unlike many planning documents, Area Plans for State Lands are actually used in decision-making. It's important to get this right.

Best wishes

Comment 58 of 86 - submitted on 04/23/2016 at 12:00 AM: I support closing the view shed of Denali Highway within Unit 28 to all new mineral/mining entries.

Please identify the view shed of the Denali Highway within Unit 28 as part of a future Tangle Lakes Wildlife Refuge.

Thank you for your consideration

Comment 59 of 86 - submitted on 04/12/2016 at 04:12 PM: I attended the scoping meeting held at Kluti-Kaah in Copper Center in March. I would like to reiterate the comments I made at that Meeting:

1. Access to the Copper River is inadequate. Currently the only places to put in a nonmotorized boat to access the Copper River is where the Richardson Highway crosses the Gulkana River, and at the Richardson Highway Bridge across the Tazlina River. The only takeout available to nonmotorized boats is Chitina. There is a critical need for additional developed put ins and take outs for public access to the river.

2. Land disposals adjacent to Klutina and Lake Louise lakes, as well as along the Klutina River, have severely limited public access to those rivers. Additional access needs to be provided. Future land disposals adjacent to lakes and rivers need to provide for public access, and be contiguous blocks, not a string of parcels along the bank. Long-standing legal issues related to the Klutina Lake Road public access need to be resolved.

Comment 60 of 86 - submitted on 04/29/2016 at 12:13 AM: This comment is to hopefully provide another perspective to the economic support of our snow sports industry that utilizes the Thompson Pass Special Use Area. I am a local business owner here in Valdez, and have lived here full time since 2003. I have owned and operated Magpies Bakery in many forms over the years since 2007, and am now operating a mobile food truck instead of a brick and mortar business down town. As a local back country skier, I too enjoy the beauty and peace that TPSU area can provide. However to survive in this town I also understand the need of our tourism industry to support our local existence. And winter sports tourism is becoming a very viable income source. In 2011 and 2012 when the store front for Magpies Bakery was open in down town Valdez, the ski season was a good 20% of the annual gross income on average. I often saw the clients and guides on switch out days from both the Tsaina and Rendezvous lodge, and on a more daily basis received business from H2O clients and guides. After having a mobile shop at Tailgate for those years as well, our presence in town was known, and the store front would be full of various winter sports enthusiasts on the down days. These customers are of all walks of life, here to be in the mountains in any shape and form. Be it the one who heli skies all over the world, or the one who has saved for years to do that once in a lifetime heli ski trip, and all the way to the shoe string truck camping back country adventurer. And the number of people making winter dream adventures happen in Valdez has only continued to increase since I have been in business in the past 9 years. So yes, a usage plan would benefit us all in the long run. But I believe there can be a fair split in land distribution so that road use in the best part of the pass can be obtained by all. A full non motorized zone on both sides of the highway for 30 plus miles might be a little exclusive though, and could drastically effect the decisions of weather it is worth it or not for these customers to come to our otherwise quiet town. They are here to access the mountains first and foremost.

As far as how to implement and pay for any policing and infrastructure, the thought of park fees was thrown out there. I agree with making it a state park and charging EVERY one usage fees. That would be a great way for the state to maintain the TPSUA. However, to tax our heli companies on top of the fees they are already paying for the permits they do have, might be a little much. I think to remember the head taxes that were put on our cruise ships here in Port Valdez not too long ago would be a good example of what just on more tax or fee can do to drive that industry from not wanting to go the extra step to make it to our town. My business saw the income from our cruise ships go from a noticeable amount to absolutely nothing in three summers. And I was hearing that it was due to the costs being too high to justify the out of the way reach when Seward had similar views and more in town to offer their customers. So when taxing our operators, I think it is important to keep in mind the tipping point, as to not drive them to fly else where. I have seen all the companies (Heli, fixed wing pilots, and snow machine guides) reinvest in our town, be it through lodging, food, equipment, fuel, communications, entertainment (evenings out on the town & down day boating and fishing), waste management, or contract labor. Even if they are not year round locals per say, they have dedicated at least 17% of their life to dropping all else, being in our town, and operating much needed business here during what has normally been a financially hard time of the year for an Alaskan business.

Since obtaining the mobile unit, Magpies has been able to continue operations due to the ski season tourism. In fact the average gross income of the first four months of the year has doubled since the store front closed, and we put our selves in the middle of the temporary Thompson pass community. Being up there and feeding a good portion of the campers, I do agree that a winter campground with bathroom facilities and management should happen. The need for waste management is the biggest. So to charge like any other state campground, and maybe a bit more because of the cost of waste management in Thompson Pass, is not at all out of the question. However if those camping in the designated zones can not access their desired runs via mechanized sport, that may cut the numbers down substantially. During the month of April you could have snow machine access, fixed wing access, speed wing with the fan on the pack flying around and landing, and helicopters. All of these people are camping right there and living in the cold so that they can maximize the play on the sunny days. And they would be more than happy to pay reasonable fees to do so. This in turn would help weed out those that are leaving the couches, and trash, and that may not want to pay fees to live. Camping fees and zones alone would begin to organize and clean up the current situation that has begun to be the norm over the past 3 years.

As far as the festivals go, they all bring awareness and publicity to Valdez and the towns on the way to Valdez. If there are issues with them getting to be out of control, maybe implementing a "let the land rest" philosophy might be a good way to see what is gained and what is lost from them. This idea is that you have a specific cycle of years that the festivals will not be held (i.e. maybe every fifth year) In that year the locals do not have the influx of what the festivals bring, and the land has an opportunity to breath. If it is noticed that there is nothing to be gained from the presence of these festivals, then the discussion of not having them should be had. But to simply pull the option of having them on public lands due to a disagreement as to what they provide would not be fair to the small businesses that have grown to use them to limp through the last stretch of winter. Tailgate has not been a huge money maker directly for Magpies, however the people that return to Thompson Pass because they found it through Tailgate have become great customers where ever we pop up. And during the ten days it is going on, the numbers in the Pass community increase, and so do our sales.

So yes, the winter population in Thompson Pass is increasing. And something needs to happen to manage the population and keep it clean. But it should be equal and open to all users in one way or another if we, as communities on either side of the Pass, want to continue to enjoy the economic benefits of this magical season and beautiful place.

Comment 61 of 86 - submitted on 04/23/2016 at 12:00 AM: I am an Alaskan of 47 years and support the Friends of Tangle Lakes. I am also a leader in the Alaska Wildlife Alliance.

I support a Tangle Lakes State Wildlife Refuge--keeping the region a great place to hunt, fish, recreate, and sightsee by protecting its important wildlife habitat and scenery. I understand the Copper River Basin Area Plan for State Lands is being updated for the first time in nearly 30 years with the eastern piece of the proposed Refuge is in Unit 28 of the current Plan. I ask that the Planning Team:

1. Close the viewshed of the Denali Highway within Unit 28 to new mineral entry (claims staking or leasing); and
2. Recommend that the viewshed of the Denali Highway within Unit 28 be part of a future Tangle Lakes State Wildlife Refuge.

Thank you.

Comment 62 of 86 - submitted on 04/29/2016 at 12:00 AM: I have been an Alaskan resident since 1981 and have recreated in the Tangle Lakes area since that time. I am hopeful your plan will preserve the view shed of the area from the Denali Highway (Unit 28) by restricting mining adjacent to the proposed Tangle Lakes State Wildlife Refuge, and keep it closed to new mineral development.

Thank you

Comment 63 of 86 - submitted on 04/29/2016 at 12:00 AM: I have lived at Mile 55 (by the Tiekkel Lodge) on the Richardson Hwy since 1996. Ak resident since 1994.

I am a general contractor and a solo back country/long distance wilderness trip skier in the Thompson Pass, Copper River, Klutina triangle since 1994. I have had the experience of shopping for, purchasing DNR land over the counter in a state subdivision near Glennallen.

My Comments have three main areas of concern: User conflicts in the Thompson Pass area, state land disposal in the Glennallen, Kenny Lake corridor and general allowed uses that affect the character and long term economic potential of the Copper Basin.

User Conflicts In The thompson Pass Area.

The number and severity of motorized/non-motorized and heliski/snowmachine conflicts has drastically increased since I began backcountry skiing in Thompson Pass in 1994 to the point where, even though I live almost at the edge of the Thompson Pass area, I rarely day ski there anymore because, not only do the indirect effects (noise, tracked up snow, trash) make for a very low quality experience despite the gorgeous scenery and terrain, direct contact with motorized users who are frequently very rude and aggressive to the point of making me fear for my physical safety makes this almost a "no go" area for me. This includes conflicts with both heli skiers and snowmachiners.

Here's an example from just this past year: Because of the good snow this winter, (2016) I ventured into the Thompson Pass area to day ski three times. I had one uneventful, very pleasant day near Crudbusters, one crappy weather day in the mouth of the Tsaina Valley and one day (Sunday, Feb. 14) where a distant handful of high performance snowmachiners saw us skinning up a very wide, open slope at brushline and delayed their transit of that slope so that their path intersected ours and we were surrounded by souped up machines riding in a circle around us as close as 50 feet away, doing wheelies, going off jumps, digging trenches. The noise was deafening and there were no trees big enough to get behind. This kind of threatening behavior practiced anywhere else would likely result in criminal prosecution and the DNR has known about this belligerent treatment of non-motorised users of public lands for decades. Why has the DNR not addressed this? I'm glad I

wasn't solo on that day and will likely not ski Thompson Pass again for a while unless in a larger group or armed because of incidents like this. It was that bad of an experience. I use public lands for a pleasant, relaxing experience, not to wonder how long I can go without being bullied or having my physical safety purposely threatened. Incidents of varying levels of severity have occurred regularly over the years I've used public lands in Thompson Pass. The worst incident was probably 15 years ago (last week of Feb. 2001) when one of the heli ski operators rapidly emptied a high capacity semi automatic pistol up in the air while standing on my single track backtrail. Fortunately, I was in the trees up on a slope. I could see him, he couldn't see me. This operator has since died and Thompson Pass is big enough for every user group to have most, if not all, of their user group desires met but not if the spirit of violence, belligerence and "all for me, (explicative removed)" continues to be permitted and even fostered by allowing the user group(s) most willing to use threat or violence to drive other user groups out.

I strongly advocate two fixes for the continually growing motorized/non-motorized and heliski/snowmachine conflict:

1. Designated use zones. This widely used tool is the obvious solution and is self explanatory but all user groups interest's must be as equally and satisfactorily addressed as possible for this to work. If this becomes a government club for one group to beat the other groups out of a balanced solution, the conflicts will continue to escalate and become unmanageable if/when the state decides to act.

An example of the high efficacy of designated use zones is the Turnagain Pass and Hatcher Pass areas. Like Thompson Pass, these areas have high usage rates by motorized and nonmotorized users. Potential for violent conflict between user groups is explosive but far thinking planners nipped the problem in the bud back when snowmachines were lower performance and user groups smaller by creating designated use zones. An unbelievable problem was handily averted with a little proactive work on the land owning agencies part and today conflict management in Turnagain Pass is merely a matter of occasional enforcement on an isolated individual, not the unmanageable battle royal of conflict it could be. Thompson Pass is probably past such an almost effortless implementation but the problem is still of a reasonably manageable magnitude. Delaying installation of designated use zones will only make the implementation of this inevitable, most effective conflict avoidance tool more difficult and costly.

2. The core of the conflict in Thompson Pass is not that there isn't enough area to go around and allow the different user groups to avoid each other, it's a pronounced lack of respect, mostly on the part of the motorized users, for the other users, motorized and nonmotorized. (snowmachiners can now routinely get into areas that heli ski operators used to consider "theirs" by virtue of terrain barriers and tradition and are enjoying harassing the heli skiers, not just the human powered skiers) As long as this culture of aggressive disrespect is allowed to exist unaddressed by the land owning agency, any solution to avoid conflict between user groups in Thompson Pass will be likely be contentous to implement and costly to enforce.

All users of public land in Thompson Pass must be made to very clearly understand that all other users of public lands in Thompson Pass have the same right to use and enjoy public land. Period. Per Alaska state law, no user group, private or commercial, has priority over any other group on public lands in Alaska. The DNR insisting and enforcing that all users practice respect toward all other users will go a long way toward mitigating conflicts in this area. Designated use zones will complete the solution.

Switching gears to land disposal issues.

I'm really at a loss as to why the state is bothering to make this an issue in the face of dwindling population in the Copper Basin and a huge inventory of desirable and affordable real estate already on the market in the Copper Basin. There is an abundance of reasonably priced houses and buildable lots that have sat on the market for 5 and sometimes 10 years years in the Copper Basin with little interest. The state opening up more land for disposal before this current backlog of available real estate is drawn down is unnecessary and will only bring the government into direct competition with private landowners. Why would the state consider acting in such a non indicated fashion?

I shopped for and own land in a state subdivision and am familiar with numerous other state subdivisions scattered around Kenny lake, Willow lake, Tazlina, 19 Mile on Thompson Pass, 93 mile on the Richardson, Copper Center, Gakona and, for some reason, a few of these subdivisions have been "successful" in that, on a significant number of the lots, people have moved in, built houses and currently live there. However, most lots in most subdivisions in the Copper Basin are either:

1. Rarely visited recreational property owned by people who live in the Anchorage area or outside the state all together.
2. Have had no improvements made, they are in the same condition, still covered with boreal vegetation, as when they were bought however many years (decades) ago.
3. Have had a few trees cut down and some junk vehicles and maybe an uninhabitable, moldy camper trailer drug in surrounded by piles of sun rotted trash bags which are in the process of growing into the ground. Some of these type lots look like and probably are unofficial landfills which lower the desirability of the lots around them.

The state's track record with achieving any kind of improved economic activity or long term population growth for the Copper Basin through selling lots is, frankly, atrocious and I'd strongly recommend the state discontinue the activity until a definite need for more lots warrants additional land disposal and their disposal process gets improved. Junk filled or mostly untouched would describe the vast majority, not the exception, of state sold lots in the Copper Basin. This points to very poor planning on the part of those arranging for the land disposals.

I am strongly in favor of appropriate parcels of additional land being put into legitimate agricultural production.

Some issues that might be having an impact on the lack of successful long term occupation, improvement of state disposed lots are as follows:

1. Poor ground. Permafrost is difficult and expensive to build on and maintain the improvements which will likely never stop needing significant maintenance. Selling a permafrost or swampy lot to a starry eyed dreamer who has just enough money or financial interest for the minimum down payment and aspirations of being able to afford the payments is not a recipe for economic growth in the Copper Basin.
2. Social, economy timing. It seems some state subdivisions may have become successful because of which era they were sold in. Lots sold during an economic boom, (pipeline construction, oil spill) seem to be the the least likely to be inhabited, least developed, most trash filled. Some of these subdivisions (by Willow Lake) have several full on, apparently well built, regular houses on prime lots in them that have long been empty and are being reclaimed into the undergrowth. Apparently a wave of recent immigrants, flush with oil spill wages, bought up a lot of that subdivision. Many actually built houses in it and seemingly had no plan, skills, knowledge for how to live in and make a living in rural Alaska. So they had to leave but always dreamed of when they could come back. Their dream houses are now past being able to be made inhabitable. Targeting buyers who have the experience, ability, interest to build and live on a state sold lot in the Copper Basin would probably go a long way toward improving the long term economic outlook of the Copper Basin.
3. Proximity to potential employers, gravel, ground water/ community well is really important. Cheaply available gravel is absolutely vital for building on soft ground. (which is a lot of the Copper Basin) A lot either is gravel based or large quantities of gravel will very expensively have to be trucked in. The further the gravel has to be hauled, the more expensive it is. Site future subdivisions close to gravel pits.

Ag land has to have water. Disposing of dry "ag" land is foolish.

4. New state subdivisions have the potential to negatively affect a community. To make sure the occupants of a new subdivision will have the opportunity to be assimilated and accepted by that community, don't force a subdivision down the throats of a community that doesn't want one or doesn't want it where it is being proposed. Local help is frequently vital to people getting started in rural Alaska. Prejudicing the locals against the new land owners by how the state plans/handles a land sale is poor planning.

General allowed uses that affect the character and long term economic potential of the Copper Basin.

An activity that has had a very significant negative effect on public lands in this region of the Copper Basin is "adventure" mining. There are 2 sizable placer "mines" at 60 and 61 mile on the Richardson Highway in the Tiekel River that supplies my drinking water less than 5 miles from my house and one even larger placer mine operation on the Lowe River by 19 mile at the bottom of Thompson Pass.

I use the word "mine" loosely because actual mining is where a person prospects using a core drill (if it is an operation of the size that these three are) to test the mineral content of a location then digs up and processes the gravel in a spot that core samples have shown to contain paying quantities of the sought after mineral. None of the three operations in this area own any prospecting equipment. They are just having fun "conquering the wilderness," running their equipment in previously untouched valleys on public lands that are easily accessible to the public. People travel halfway around the world looking for a place untouched by modern man and we had three gorgeous, easily accessible but mostly overlooked valleys that answered that description just minutes off the Richardson Highway and adventurers have run bulldozers up in them and dug big holes (violating every stipulation in their DNR Mining Operations Plan without consequence) without even prospecting to see if there was anything there to dig for. (Long time acquaintance of mine who helped process the concentrate from the most recent "mine" said "there was nothing there. All that digging for a few specks of flour gold and a half bucket of pyrite")

Destruction of unusually accessible, high aesthetic value public lands in the Copper Basin to allow wannabe equipment operators to realize their dream of tearing up the Alaska wilderness is an extremely poor use of public lands. Tourism in the Copper Basin, due to its pristine yet accessible wilderness, has enormous economic potential.

This area, from Valdez to Tonsina and Klutina lakes to Chitina, was very heavily prospected in the early 1900's and, while a few places looked promising, no paying quantities of gold have ever been located in this area. To continue to allow people to pursue their hobby of running heavy equipment on public lands in this area just because they have a \$140.00 mining claim but no prospecting equipment is damaging to the real economic powerhouse of this area, tourism. While I'd like to see the all areas in the Richardson Highway corridor closed to adventure mining, I realize, due to the archaic mining laws, that is not likely to happen. I'd settle for a much higher reclamation bond and realistic enforcement of conditions set forth in the mine claim stipulations.

I'd also like to see the Tiekel Valley corridor from the Richardson Highway in front of Mt. Billy Mitchell to the Copper River designated as "trail-less."

It is appropriate to declare this area trail-less due to it's brutal/swampy/brush choked terrain. Any trail built in here would be expensive to construct and would probably need to be almost entirely reconstructed every couple years. As it is, it's very high quality for ski travel in the winter and, like the other valleys that the miners drove dozers up in were, is high quality wilderness easily accessible from the highway by normal people without airplanes or snowmachines.

Thank you

Comment 64 of 86 - submitted on 04/13/2016 at 12:00 AM: -- Continue the management of the Nelchina Public Use Area as public management and ownership, rather than land sales. Its chief use should be wildlife habitat and recreation. Continue guidelines in place for generally allowed uses limited during caribou calving season May 1 to June 15. A number of private subdivisions have popped up around this area, making it even more important that this habitat area remain intact for area residents and for the many hunters/visitors from elsewhere who now use it. We don't see that pursuing a particular management plan is necessary in addition to the present designations for the Nelchina PUA, but if such an effort is made, we'd like to know about it and be involved. We have been residents here since 1983, and active in most agency planning efforts.

--Keep the part of the Denali Block north of the Denali Hwy that was a question area in the CRB plan please.

--We would prefer that the CRBplan boundary follow the MatSu Borough boundary in that area east of Lake Louise that was a question during the scoping meetings, unless there is a more compelling reason for that exclusion (Jan Lakes area).

--We'd ask that if you add to present settlement areas you consider the earlier intentions of that area, i.e. the remote cabin program placed people who wished to live remotely; settlement areas near towns could be extended where the demand exists or if the settlement would enhance the economic well-being of the community.

Thanks for allowing us to comment.

Sincerely

Comment 65 of 86 - submitted on 04/28/2016 at 12:00 AM: The following are the scoping comments of the Alaska Quiet Rights Coalition (AQRC) on the Copper River Basin Area Plan for State Lands. Thank you for the chance to participate in this very important planning process.

Founded in 1996, AQRC's mission is to maintain and restore natural sounds and natural quiet in Alaska through advocacy and education for the benefit of people and wildlife. More particularly, we're dedicated to protecting the rights of Alaskans to quiet places for the benefit of public land users, home and cabin owners, communities, businesses, visitors, future generations, and wildlife. We believe that natural sounds and natural quiet should receive the same consideration given to other ecological values, such as clean air and water, fish, wildlife, soils, vegetation, scenic beauty, and wilderness character. Although there are many places in Alaska that look the same as they did 100 or more years ago, very few sound as they did just 10 or 20 years ago.

In addition to protecting ecological values like the ones listed above, one of AQRC's specific goals is a fair and equitable overall balance on the public lands between those managed for motorized recreation, and those managed for quiet, truly traditional forms of recreation like hiking, snowshoeing, cross country skiing, canoeing, and kayaking.

1. The Natural Soundscape (natural sounds and natural quiet). Many of us remember very well when it was quite unusual to be disturbed by mechanical noises in the outdoors. There was quiet, which was beautiful in itself, and there were beautiful natural sounds, like falling snow and birdsong. These days, that quiet and that chance to hear natural sounds are all too frequently shattered. As we said above, there are many places in Alaska that look the same as they did 100 or more years ago, but very few that sound as they did just 10 or 20 years ago.

But "peace and quiet" are still highly valued, and frequently mentioned by visitors to the public lands both in Alaska and Outside as one of the outstanding and most appreciated characteristics of those lands. The State of Alaska should seek to protect those values, and where necessary, restore them. And as we also said above, the natural soundscape is just as deserving of analysis and protection as other ecological values that are routinely assessed.

Unnatural noise can harm human health, both mental and physical. A doctor at a Seattle hearing on a proposal that would result in large numbers of coal trains passing through the city said that the two biggest stressors he sees in his patients are traffic and noise. Natural quiet and natural sounds can be soothing and can benefit human health. And unnatural noise can harm wildlife as well as humans; one of the best examples is how this can disturb songbirds during the breeding season.

But beyond any measurable demonstration of health effects, many people visit the public lands as a refuge from noisy, busy, crowded daily lives. This certainly includes tourists, whether from Alaska, from other parts of the nation, or from other countries (and these tourists can generate significant economic benefits). Most of them, we suspect, are not only hoping, but expecting, to be able to hear and enjoy natural sounds, and to experience natural quiet.

The State should treat the natural soundscape the same way it treats other important ecological resources, and should consider, including in the Copper River Basin, developing soundscape plans. These plans would identify a sounds baseline, provide for periodic monitoring, and describe ways to maintain and, where appropriate, restore natural quiet and the opportunity to hear and enjoy natural sounds.

2. Quiet Recreation. Statewide, there is a gross imbalance on the state and federal public lands between the many areas and trails managed for motorized recreation, and the relatively tiny number managed for quiet, truly traditional, non-motorized recreation. This is certainly true of the Copper River Basin. Virtually every acre and trail on the State, BLM, and National Park Service managed public lands are open for recreational snowmachining, and only a very small portion are closed to summer ATV travel. Concepts of balanced land management, true multiple use management (in the absence of obviously overriding factors, at least some lands are allocated for all legitimate activities), and fairness to the many Alaskans and visitors who are seeking a quiet outdoors experience require that the State set aside lands to be managed for quiet recreation (that is, closed to motorized recreation). The plan, consequently, should designate a reasonable number of areas and trails that are suitable for quiet recreation and are recommended for closure to motorized recreation. The Division of Mining, Land and Water arguably does less than any other state or federal land managing agency to provide quality opportunities for quiet recreation; it would be a real step forward, and a feather in DMLW's cap, if it were to do so now.

Quiet recreation and motorized recreation don't mix. There is a clear conflict between the two. So-called "shared" trails and areas aren't truly shared--the quiet recreationist is the loser as his experience is significantly degraded by the noise, air pollution, marring of scenic landscapes (in both summer and winter), and loss of wildlands character in areas open to motorized recreation. However, perhaps more often than his experience is degraded, the quiet recreationist is totally--and unfairly--displaced by the motorized recreationist. Only areas managed for quiet recreation can provide a quality experience for the non-motorized user.

The need to more responsibly manage motorized recreation becomes more apparent every year, as snowmachine and ATV technology improves dramatically and the range of the vehicles increases equally dramatically--as do the associated conflicts and impacts.

As suggested above, the effect of motorized vehicle noise on humans is not their only impact. Ecological impacts include degradation of fish and wildlife habitat; other impacts to fish and wildlife; air and water pollution; often severe damage to soils and vegetation; snow compaction; and the loss of natural quiet and natural sounds. As a responsible steward, the State should of course protect these important resources.

The State should also encourage, rather than discourage, visitors to enjoy its public lands with muscle, rather than motorized, power; the health benefits of muscle-powered recreation are especially important at a time when obesity is a serious state and national problem.

Another benefit of recreating on one's own power is coming to better understand our state and nation's history: how tough, both physically and mentally, and how self-reliant, our ancestors could be. In traveling as they did a person gains substantially added respect for their accomplishments in sometimes very harsh environments and conditions.

The regional conservation group Copper Country Alliance has compiled a list of areas and trails that it suggests are suitable for quality quiet recreation and should be recommended for closure to motorized recreation (or at least some reasonable portion of them). We include that list below, and endorse it.

- A portion of Thompson Pass. Experienced and knowledgeable backcountry skiers have recommended that the northern, partially wooded end of the Thompson Pass area, Mile 34 to 54, be non-motorized. This does not include the highly popular open areas farther south, and receives relatively little, and relatively recent, snowmachine use
- Tikel River downstream of the Richardson Highway
- Mile 62 Richardson Highway to Kimball Pass via telegraph route
- Perhaps another route or area within the Tonsina Controlled Use Area, which is already closed for motorized hunting from late July through September
- A route on any state land along the north bluff of the Tonsina River, from the Richardson Highway bridge to the Edgerton Highway bridge
- Mile 12.5 Denali Highway trail on the north side of the highway
- Mile 4 Denali Highway to a ridge within the Paxson Closed Area
- West side of the Copper River from O'Brien Creek south
- Designated non-motorized routes or trails in the Nelchina Public Use Area

Thank you again for the opportunity to provide scoping comments on this important planning process. We look forward to continuing to participate in the process, including of course reviewing and commenting on the draft plan.

Sincerely

Comment 66 of 86 - submitted on 04/29/2016 at 12:00 AM: In view of the total absence of ML & W managing any of its lands (if not 100%, it is very close) for non-motorized recreation, I would like this revised plan to include trails and areas in which motorized recreation in summer and winter is restricted or prohibited. It is a well known fact that motorized recreation drives out and displaced the non-motorized, quiet recreation. It is hard to argue that state lands are being managed for the "maximum benefit of its people" when its non-management or lack of same deprives a portion of its people from using/enjoying those lands. Unless, of course, DNR has made the

decision that the "maximum benefit" equates to motorized use.

I would also suggest that planners take a good look at the recent report showing the amount of revenue created on BLM lands in Alaska which are managed for non-motorized users. In my opinion this lends economic weight to the fairness argument regarding managing lands for quiet recreation. See <http://www.pewtrusts.org/en/about/news-room/press-releases/2016/03/31/quiet-recreation-on-blm-land-generates-billions-of-dollars-supports-thousands-of-jobs> I support the Copper Country Alliance listing of specific areas and trails recommended for non-motorized management.

Thank you for this opportunity to comment.

Comment 67 of 86 - submitted on 04/07/2016 at 12:15 PM: I would like to thank Brandon, Chuck, and Tyler for their time and presentation in Valdez 4/6/16. I live and work at Serendipity (mile 46 Richardson Hwy.) for the past ten years. Our neighborhood of backcountry skiers and snowboarders seemed to be least half of the people at the meeting. Personally I'm not against helicopter skiers and snow machines but I do believe there is a safety issue as these user groups interact more and more. Hopefully before there is a tragic accident I think there needs to be regulations put in place to make a non-motorized area of use. Knowing the Thompson Pass area is such a small part of the whole plan maybe recommendation should be made to make it a higher priority to get a management plan or regulations. I love living and working here year round and enjoying the freedoms of Alaska but when the majority of the winter users come from other places I feel some regulation is needed to provide locals with a way to enjoy the area how they want to. The skiing/snowboarding around Thompson Pass is world class and I don't want to deny anyone from enjoying it how they want to, I feel a non-motorized area would only add to it. Sorry I know this is such a small part of your planning but I'm very passionate since I live here. Thank you very much for your time I'm excited about seeing the whole planning process and what the future holds. - Phillip Plunkett

Comment 68 of 86 - submitted on 04/29/2016 at 09:58 PM: SETTLEMENT: -All residential land sales areas should be carefully considered and close to existing communities. If there is a scarcity of affordable land for young people, some affordable land should be made available BUT not by undermining local private land prices. -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. -Remote recreational cabin sites should not be in areas that are already important to hunters, fishers, and recreationists. -Land sales should not impair public access to hunting and fishing areas; e.g., ridges that lead to sheep country, or creeks with grayling. -All land sales should have designated access roads or trails. Otherwise, OHVs can and are doing great damage. -Land should be reserved for neighborhood and community trails and parks or greenbelts or open spaces. -Land surrounding Tonsina Lake and the Tonsina Lake Trail should not be settled because of its importance to hunters. -Klutina Lake is prime bear habitat and is well-used by bears. This makes it unsuitable for settlement.

WATER RESOURCES (STREAMS, LAKES, WETLANDS, GROUND WATER): -As a Kenny Laker since 1977 who hauled water for years and has a well (after drilling 3 times), I know how important and scarce water is. We have to run our water through 3 large filters, a water softener, and for our drinking water, a reverse osmosis system. -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 should not be impaired by new sales. -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.

FISH AND WILDLIFE HABITAT: -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. -The Alaska Department of Fish and Game should be heavily involved in this planning process. Game biologists should plan management to keep herds stable and strong, with no influence from guides or politicians, according to my husband. -Eastern Denali Highway should be kept in the Planning Area. The highway watershed should be closed to new mining claims. It should be recommended for inclusion in a future Tangle Lakes State Wildlife 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).

TRANSPORTATION AND TRAILS: -Some areas and trails need to be non-motorized. We use a 4-wheeler to get wood and do chores, but similar to the right to motor into some areas, I have the right to some places that have the peace of quiet. I also think there should be some areas that snow-machines can't go on because a bunch of tracks look like litter. -The tradition of hunting on foot, which many Alaskans used to enjoy and take pride in, is being lost. My husband has hunted and fed our family here for almost 40 years, and he is having a harder and harder time. It's not because he's in his 60s, but because he says hunting from a 4-wheeler isn't hunting and he can't compete with the almost completely unregulated motorized chasing of game. He thinks 4-wheelers should only be allowed on designated trails in some areas, with other areas reserved for non-motorized hunting. -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 designated motorized trails, and in Controlled Use Areas, ATVs can be used for non-hunting purposes. With the exception of the Rusty Lake Trail, we know of no designated non-motorized trails on state land in the Planning Area. -Backcountry skiers have proposed a non-motorized zone at the northern partly wooded end of the Thompson Pass area. -Non-motorized trails are much cheaper and easier to build and maintain than motorized trails. -A road link to Cordova (the old Copper River Highway idea) should be

AGRICULTURE AND GRAZING: -Agriculture land sales should be of various sizes to promote local and regional self-sufficiency or larger markets; they should be suitable for crops that will grow well in our changing climate, and (like current agricultural offerings) they should have covenants to keep them agricultural. If they are covenanted, they will not compete with private land sale prices. Some land with good soil should be small enough to be affordable to young people. -The potential for spreading invasive species of plants should be a consideration in framing all goals and policies removed from the plan.

RECREATION, CULTURAL, AND SCENIC RESOURCES: -Maintained outhouses are a necessity for sanitation and for encouraging a tourism industry that will be a source of local businesses and jobs. -Klutina Lake should remain public because of its heavy use by fishers, hunters, and recreationists. -Balance is needed between motorized and non-motorized uses of the land.

FORESTRY: -A mechanism is needed for the State, BLM, Ahtna, and Chitina Native Corp. to collaboratively keep track of all anticipated 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.

SUBSURFACE RESOURCES: -Oil and gas exploration should not be encouraged or allowed far from existing communities and roads. Fossil fuels 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. -The goals for fossil fuels need to change in view of climate change. The goal should be to wean ourselves off these energy sources. -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. -Mineral and fossil fuel development should not be an allowed use within sight or sound of highways. Keeping our highways scenic is important to Alaska's growing tourist industry and to Alaskan travelers.

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 Wildlife 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' ideas for expanding the Area boundary near Lake Louise, and also extending the southern boundary west to include Thompson Pass.

Sincerely, Felicia Riedel and Tom Butler Kenny Lake, AK

Comment 69 of 86 - submitted on 04/20/2016 at 08:48 AM: I attended the scoping meeting in Kenny Lake April, 2016. I have lived in CRB 25 years; worked for USDA in natural resource management and community development. Soil Scientist.

Comments: Land Sales and Conveyances: Delete Squirrel Creek-poor aspect and access. Delete Upper Tonsina: Important wildlife habitat. Klutina River and Lake Areas-keep for public recreation and access. Don't block public access to bluffs, trails and rivers with subdivisions. Don't plan with roads through/in wetlands; if you do, get permits from Army Corps for road development, don't put the burden on landowners. Use setback from highways-protect character of highways-Now I have to look at new junky lots in Nelchina from most recent subdivision when driving by-can't see KL lots and homes from road. Keep subdivisions near communities and with adequate water resources-none past Mile 7.5 Edgerton as there are many homesteads being sub-divided and there is no sub-surface water. McCarthy Sage Subdivision still too large with 90 lots. Used for vacation homes if that. Fireweed has 40 lots-after 32 years, 12 structures and one permanent resident. Why is there demand for more? Please develop more public use campgrounds, rest areas with WORKING/CLEAN toilets. Restrict use of turnouts for camping within 20 miles of RV camps and towns. Make more access to State Lands near communities for hiking, berry picking and wood cutting.

Comment 70 of 86 - submitted on 04/29/2016 at 12:00 AM: Good day,

We would like to begin by thanking you for allowing public input to help guide you in your land disposal decisions. My husband and I are 37 year residents of Kenny Lake, raising our family here. Our thoughts are&

1. Water in the Kenny Lake area is difficult to obtain. Dry wells occur and successful wells are very deep. For example, ours is 325 ft and in the summer there is low flow and a smell of sulphur. Some wells go as deep as 425 ft. Cost of ours, 20 years ago, was \$25,000 and this has certainly risen dramatically. As a consequence, most landowners do not drill and pump water from the Community and Firehall well at mile 4.5 on the Edgerton Hwy. There is a great demand upon this water source. Will the well sustain heavy use on a long term basis? Can Kenny Lake support a large population? Land offerings in the Copper River Basin are appropriate, but Kenny Lake is not a good choice because of this factor.

2. The private sector in Kenny Lake currently has numerous lands for sale, so opportunities to live here do exist.

3. Willow Creek and its watershed is a vital natural source of water and wetlands in our semi-arid area. (We are depicted on maps as semi-arid.) Keeping this watershed in tack is essential to keeping Kenny Lake from becoming too dry. Having walked this country for over 30 years, I can draw a map of the wetlands that are important to the Willow Creek watershed.

Willow Creek and Willow Lake drain off 2 major swamp systems and there are many small ponds and lakes. The swamps flow in a southerly direction and are large enough that they drain across the Edgerton Hwy in many spots from Mile 1 to Mile 6. This extensive wetland provides water to the Kenny Lake land, habitat for birds, ducks, and swans, browse for moose, and supports lynx, fox, hare and many other small mammals. It is an important habitat area. Please do not develop.

Hand drawn map included at this point.

4. Our understanding is that Bill Sutton's Hay Farm, Mile 14.5, Edgerton Hwy is now State owned. If this is incorrect please disregard this comment. Under Bill Sutton's care his farm was one of the most productive hay producers in the State. His fields are setup for large scale machinery haying. Keeping those long fields in tack just makes sense and this is what Bill would want. We would hope his lifetime of hard work building his farm and business is honored and the property remain a large scale agricultural parcel.

5. Maintained outhouses are so needed throughout the Copper River Basin and through out the State. This is an expense, but the waysides throughout Alaska are just gross and so detract from the beauty which we promote to the tourists. Alaska is struggling with funds, but outhouse at waysides should be a priority.

6. Looking at the map you graciously provided, which is displayed at the Kenny Lake Public Library, confirms the fact that the Edgerton Hwy and the Old Edgerton Hwy do not have a lot of State land for traditional use, such as hunting, wood cutting, berry picking, and recreational use. Because of the large amount of Native Select the land we have always used before is no longer available. For residents, the remaining State lands now serve a vital role, providing land we can access. Food is very expensive here and traditional use areas are important. Other areas of traditional, local use are >

- Tonsina Plateau including Kimbell Pass

- Tonsina River at mile 74, Richardson Hwy The 4 wheel road that runs along the Tonsina River up to Tonsina Lake is an important hunt/trapping area and recreational spot. Boating is also staged from here.

- Tonsina Bluff Trail behind the Kenny Lake School is valued by local residents. This is our "to go" spot and has lots of use. It is a magnificent trail and view and is a part of our community fiber. Please do not put this land up for sale. Doing so would take something spiritual and important from the heart of our community.

- The Eastern Denali Hwy should be kept in the Planning Area. The Nelchina caribou herd needs this land to thrive and we need the caribou as an important food resource. We, as many area residents, hope for State Wildlife Refuge Status someday to protect this important land from development.

- Klutina Lake should remain public. Fishing, hunting, camping ect., are a part of this region. Bears depend upon the spined out salmon that come into the Lake. This is a major food source for them.

- Nelchina Public Use Area please keep all of the use area public so hunters, wildlife and recreational users continue to benefit.

Again, thank you for the opportunity to comment.

Comment 71 of 86 - submitted on 04/29/2016 at 07:56 PM: Hi,

As a resident of Valdez and one who works and recreates readily on the pass, I see the rapid and dramatic changes that are happening within this very beautiful area that is the TPSUA. I work with the local avalanche center, am up there readily and have been able to see a lot of scary, crazy and sad things happen within this area. It could be so very different, but it seems that the free nature and lack of structure up there results in a depressing scene when the numbers increase and more visitors come in from other areas. They don't treat the place the same as the locals do and there are a good number that don't seem very considerate, respectful and educated based upon their actions.

I generally don't like to see more regulation, but when things degrade below what you consider safe and reasonable, maybe someone has to step in and help those that can't seem to help themselves.

Ultimately, the best solution is education and accountability. I would like to believe that education would cover most of it, but sadly, many still make poor decisions and need someone to babysit them.

Both of these items are difficult to address, but there are ways to ultimately implement them over time. Some form of structure, fees and penalties are some ways to make people accountable that don't seem to get it on their own. No one likes to be hit in the pocketbook since it seems to be the main way to get any human to do anything....as long as it is substantial enough of a fee. If you make it nominal, they will just ignore and pay for the slap on the wrist....you see it all the time worldwide. Yes, sad but true scenario for the human race. In the process of all of this, some money can be raised to help fund the proper management of this area.

Education is a cultural thing that has to be accepted from the inside, but quicker, short term options can include mandatory videos, classes or tests to help prevent recreationists from making bad decisions in hazardous places and putting many in harm's way.....such as with avalanches and one person on a slope at a time.

All in all, I support more structure to the motorized usage on Thompson Pass. As of now, the current set up is destined to result in a serious accident and/or fatality that no one wants to see.

Beyond the safety concerns, the serenity and quiet of the area is quickly fading. It is difficult for some to put value on this, but it should be considered just as much as safety. After all, most of us live in Alaska because we still have this and not everyone like recreating around loud machines during their time in the mountains. In all honestly, some form of muffler regulation would make this an amazing change for everyone. I appreciate the joys that motors bring, but at times they seem like mosquitoes buzzing about me. It's a completely different type/category of fun that is annoying when you are not there for the same reason. Something others should be educated on....

To get into more details on my thoughts on the TPSUA, see the email with attachments that I will send out from salysk@yahoo.com. It actually is the same submission I sent in to Jess Meybin about a month ago, but I put a lot of time and thought into it and feel that the ideas should be read by all if you haven't already done so.

Especially note the map and different break down of heli vs snowmachine free zones. I think the originally proposed area for no snowmachines, that Tory Dugan submitted, should be expanded upon slightly. I drew this area in pink. The reason for this, as I stated earlier on paper, is that I believe a couple more peaks and drainages should be included to the west since they are closer to the pass. With higher starting elevations for access, this provides skiers more options in early and late season. In all honesty, I would like to expand it even further, but that would set off a huge uprising within the snowmachine community. With Tory's proposal, he is not asking to close access to areas that are highly used by snowmachines....therefore they are not sacrificing a whole lot. But, by expanding more to the west toward the pass, some people would be up in arms.

I feel that my proposal (up to the summit of Python) is more demanding than Tory's, but a reasonable start to the process so there won't be too much of a fight with snowmachiners.

The heli companies on the other hand will be frustrated, but they shouldn't be skiing the highway corridor anyhow....that's why they have a helicopter....duh.

Thank you for your time and consideration. I hope we can all work together to promote safe and reasonable management of the TPSUA.

Cheers, Kevin Salys. Attachments: 3 pages of handwritten text for reference and 3 maps

Comment 72 of 86 - submitted on 04/28/2016 at 12:58 PM: This comment is in support of setting aside non-motorized use areas and setting additional regulations of motorized and commercial use (incl. heli) in the Thompson Pass Special Use Area (TPSUA).

TPSUA is one of the most beautiful and easily accessible areas of the U.S. particularly for mountain sports. World class backcountry skiing destination accessible from the road due to reliable snow quality and quantity and skiing terrain for all skill levels.

To my knowledge, commercial recreation is only managed in form of permitting for helicopter skiing, lodges, and other winter recreation events. The current level of management though is inappropriate considering the public and commercial demand currently observed. Current management is ineffective and understaffed (limited resources) to preserve world class recreation values of the highest quality. Examples: - Helicopter skiing businesses use limited public parking facilities - Low level of regulation of increasingly large scale public events that is unable to limit the externalities for other users and the environment. - Camp cities consisting of RVs and tents related to snowmachining events and heli-skier operations lead to congestion and user conflicts. - Environmental externalities (primarily NOISE and FUMES, but also human waste, engine waste and oil products, logging, and vandalism occur) - Actual user numbers exceed permitted user numbers when many participants of large events poach event registration fees and thus free ride but still camp out in non-designated spots.

Possible solutions: - Establish infrastructure and improve existing infrastructure (Worthington facilities) - Establish commercial and private user fee system to pay for rule enforcement, infrastructure, maintenance, management, emergency response, backcountry education, etc. - Establish non-motorized zones as follows:

A) Winter: - The Mount Diamond Mount Tiekel area between mile 33 and 54 on both sides of the Richardson Hwy extending to the top ridges of the peaks on both sides of the highway, should be set aside as non-motorized. This area is not used by snowmachiners all that much and it has the best road-accessible backcountry skiing in the entire US. This area should be the minimum area set aside for non-motorized use. - Additionally, there should also be a non-motorized zone on the south side of the highway starting at mile 26 to at least mile 39 extending from the highway to the highest ridge tops. This section of the TPSUA would follow a management approach similar to the one that successfully exists by the U.S. Forest Service for the Turnagain Pass area. Easily enforceable as the road is the border between motorized and non-motorized users. The north side between mile 26 and mile 39 should remain motorized as it serves skiers on snowmachines access to terrain further up the Tsaina Glacier vicinity.

B) Summer: All of TPSUA between mile 22 and 39 should be non-motorized in the summer. 4-wheelers can be a real annoyance in the Blueberry Lake campsite area and take away much of the experience one could have there. Many camped at Blueberry enjoy the stunning views of the surrounding mountains to the south and Marshall Pass, expecting it to be rather quiet when it is not. Other areas of the TPSUA

could see increased motorized use in the future and their current value could be jeopardized. The hiking in the summer in the alpine is great right from the road particularly between mile 24 and 28. This value should be retained and preserved for people accessing these mountains from the road. Also, helicopter use in the summer for hiking and sightseeing in this area could further diminish recreation values for the majority of visitors (using cars) to this area.

The TPSUA is definitely reaching carrying capacity for the number of helicopters and snowmachiners that use this area. In Turnagain Pass, the number of backcountry skiers has rapidly increased in the last 5-10 years leading to congestion. Many of the Turnagain Pass skiers (including myself) are increasingly displaced from Turnagain Pass and take longer visits in the TPSUA instead of skiing at Turnagain (better snow and much better terrain). Establishing a non-motorized zone in the TPSUA would expand high quality backcountry skiing opportunities in the TPSUA and to some extent could relieve congestion in other winter recreation areas of the state, particularly around Anchorage Mat-Su where non-motorized users are growing at similar or higher rates compared to motorized users. Also, in the next 20 years, the snowline will go up in elevation. Areas that have been used for backcountry skiing in lower elevations (e.g. Turnagain Pass and front range Chugach State Park near Anchorage) will become less available due to reduction or elimination of snow cover throughout future winters. This will lead to more congestion and concentrated use of winter recreation areas such as the TPSUA that are above the average snowline predicted for the next 20 -40 years. Just for this reason, the DNR should consider better management now rather than wait another 20 years. For more information, see predictions for winter recreation in Chugach National Forest Climate Assessment report, to be published in 2016.

Comment 73 of 86 - submitted on 04/29/2016 at 12:00 AM: I am the safety officer for Heli-Ski U.S. Association, Inc. and in that role conduct performance reviews of safety practices by our member firms. From 1996 - 2006, I was a helicopter skiing guide in Valdez, Alaska. Over the past two years I have watched with alarm as conditions on Thompson Pass have grown more crowded and user conflicts have multiplied. In this regard, and in the context of your scoping process, I respectfully request that you adjust the scope of your planning process:

1. Geographically, the area that is the subject of your planning process needs to be expanded to encompass an area at least 20 miles south from the pass, toward the town of Valdez. If you fail to do so, any planning initiative will simply cause a relocation of activities that you seek to regulate.

2. Special Events need to be more closely scrutinized. This April I witnessed numerous user conflicts that peaked with special events that brought many more snow machine users to the pass with inadequate sanitation, no traffic or crowd control and so many snow machines in some area that glaciers resembled interstate highways. Most alarmingly, I witnessed snow machine riders ascending slopes that skiers and snowboarder's were descending, simultaneously. While all recreational uses need to be accommodated, events that overburden the resource are contrary to the best interests of the community and present a high risk for tragedy..

Thank you for your time.

Comment 74 of 86 - submitted on 03/21/2016 at 10:32 AM: The TPSUA is one of the last vestiges of true recreational freedom left in Alaska. The reality is that a significant portion of Alaskan wilderness is still underused, primarily as a result of lack of access. Limiting access based on user groups is not an equitable way to encourage more recreational opportunities in Alaska. The non-motorized crowd often brings an unrealistic approach to land management. By shutting down lands to certain groups, they promote the 'US vs THEM' mentality and only further the problems of land use by not allowing one group in. We have seen this play out in Hatcher Pass and Turnagain Pass, with less than stellar results. The battle between user groups only grows worse, the goal should be to create a synergistic environment in which all users can safely access the amazing terrain that Alaska has to offer. A public awareness campaign that encourages safe use by all groups using a shared public space rather than limiting access is a better way to manage the land.

Thank you for your time and consideration.

Comment 75 of 86 - submitted on 04/25/2016 at 12:00 AM: I have been an avid recreational and subsistence user of the greater Tangle lakes area for ~20 years. I have a couple recommendations I'd like you to consider.

Please close the viewshed of the Denali Highway within Unit 28 to new mineral entry (claims staking or leasing).

I recommend that the viewshed of the Denali Highway within Unit 28 be part of a future Tangle Lakes State Wildlife Refuge.

Sincerely

Comment 76 of 86 - submitted on 04/29/2016 at 12:00 AM: After spending the last 4 winters on Thompson Pass, I have seen the number of users grow dramatically. I have spoken with a number of people on "what should be done" in regards to Thompson Pass, and I have gone back and forth on what I feel like should be done. I fall into all the categories of users on the pass, so I would like to say I am not biased towards any of them. I love ski touring, I own a snowmachine, and I have worked as a heli ski guide. A number of people who only ski tour (non-mechanized) are wanting the mechanized part to go away, because they are being affected the most. The heli operators are upset because snowmachines are getting into "their zones". In all honestly all these people are throwing a fit over nothing, they are upset because Thompson Pass is becoming so heavily used, and it is no longer their little secret. So what do I think?

I think something should be done, but nothing too dramatic. Limit a very small area for non mechanized use. I have heard a bunch of non mechanized advocates pushing for the areas known as "Stairway going east through Mt billy mitchell" or basically the everything east of the Tsania Lodge, on the south side of the road. I believe it should be that zone but only the high elevation glaciated terrain, not the trees/alder cover down low. The trees down low are a blast to play in on a snowmachine early season when the light is too flat to go anywhere up high. But the glaciated valleys up high are very difficult to get to on a snowmachine, and there is really nothing that great for a snowmachine rider to access up there anyways, so why not limit it?

I also believe that the helicopters should not be aloud access to any of the terrain of off the road, especially the areas known as "Stairway, RFS, Cracked Ice, Python, Gully 2 & 1" After a big snow storm, the helicopters have a huge advantage with the ability to fly straight up to those areas and ski basically everything before any one else has a chance to get to it. I say this because they have a helicopter, and can go to places most people will never see, so for them to ski out the stuff that snowmachiners and hikers go to before they can even go to it is a bit unfair. Wlth that being said, the snowmachiners do not make it out deep to the heli zones usually until a couple days after a storm. Snowmachines are limited by snow depth, even the brand new 174" Summits cant make it out to the Tsania Valley until a day or 2 after a storm. So the heli operators are upset because days after a storm everything starts to get tracked out and they have to go deeper into the mountains and spend more money to get there. They do not get more money from their clients who are all paying a set price, unless it is done by hobbs time, but either way the heli companies are sorta getting the short end of the stick, they do have a helicopter to ski though, its not that hard to find good untracked snow with a helicopter. But again, Thompson Pass is becoming a very heavy used area, especially with WESSC coming back, and in a sense it is sort of an "every man for them self" setting out there.

If snowmachines were to be limited to a certain area, it would never work. The majority of users on Thompson Pass are snowmachiners, and you guys probably don't hear a lot from the snowmachiners because they are not being affected by anyone at all. Of course you will get an ear full from the people who only hike to ski on Thompson Pass, because they have the worst gig. They all really just want to ski down, and if you offered to pay for a hikers seat in a helicopter, or give them a snowmachine bump, 99/100 people will take it. They are just sour because they don't own a sled, or have the money to go heli skiing. Which is understandable, but that doesn't mean you should "punish" the people who worked extremely hard to purchase their snowmachine or go heli skiing by limiting the access.

Bottom line- Limit a small area for hikers, Keep the helis off the road, and let the sledders do their thing, because they are the largest user group and they are the ones making the economy go round in numerous ways. There is no real animosity between any of them, like I said, it's mostly just the people who only hike-to-ski are the ones that are upset and it is because they haven't figured out that if you don't have some sort of machine on Thompson Pass then you are doing it wrong. Thompson Pass is home of the mechanized use, and it should stay that way, always has been always will be. Just limit a small section of it for hikers just to make them feel good. Thanks and good luck, this is a huge deal what you guys are taking on and I have ton of respect for you all and wish you good luck to make the best decisions and the best plan for Thompson Pass.

About me- I moved to Valdez for Thompson Pass. I have worked for Black Ops, H2O Guides, and currently for Rendezvous. I currently work for the avalanche center, a kayaking company, and on a boat. I work super hard to play on Thompson Pass in the winter. It is my life, and there are countless people just like me in Alaska/Valdez.

Comment 77 of 86 - submitted on 04/26/2016 at 12:00 AM: I am writing to submit comments on Tangle Lakes, specifically Unit 28. I hope that there is one day a Tangle Lakes Refuge or some other designation that protects the viewshed and manages the impacts on wildlife, birds, plants, this special ecosystem. I have lived on the Denali Highway and still own land on it. I have spent a lot of time on that corridor and find it a unique place in the state of Alaska. We need to protect it from further natural resource extraction. It's one of the few jewels in the crown left in the Interior.

Thanks for considering my comments.

Comment 78 of 86 - submitted on 04/29/2016 at 04:28 PM: Please consider limiting four wheeler activity along the Denali Highway to certain trails to limit degradation of foot paths.

Please consider limiting mining and new claim staking and leasing to lands not viewable from the Denali Highway.

I support including the Tangle Lakes area and the land seen from the Denali Highway in a wildlife refuge to be managed by the Alaska Department of Fish and Game.

Comment 79 of 86 - submitted on 04/29/2016 at 12:00 AM: The Tangle Lakes area has become an area of Alaska in which the view from the Denali Highway is very valuable to the state's economy through tourism and recreation. As you review the Copper River Basin Area Plan, please consider limiting new mineral entry (including claims staking or leasing or active mining activities) to areas out of the view of the Denali Highway from Paxson to the Maclaren River.

I also support including the area viewed from the Denali Highway from Paxson to Maclaren River in a state wildlife refuge in the near future.

Thanks for the opportunity to comment.

Comment 80 of 86 - submitted on 04/29/2016 at 02:19 PM: Land Development: 1) Land sales or other development should not occur in important wildlife habitat. Terrestrial and aquatic habitats should be protected above other uses. As stewards of land and waterways, DNR should work closely with Alaska Department of Fish and Game (ADF&G) to ensure important habitats are protected. Basin residents and others rely upon the lands, waters, fish, and wildlife resources of the Copper River Basin for food, shelter, and for the opportunity to recreate. The plan should clearly describe these uses and values and should make them among the highest priorities. Slide Mountain, near Snowshoe Lake has important recreation and wildlife habitat values that should be protected.

2) The siting of any public land offering should be thoroughly vetted through ADF&G to ensure protection of both terrestrial and aquatic habitats. ADF&G comments should be a clear and stated part of any decision.

3) The continued development of private lands (homesteads, allotments, T&M sites) throughout the plan area has reduced the need to offer additional state land for disposal. It is important that the plan consider the extent of this private land development and factor the additional use and impacts when considering other uses or development. DNR should not be in competition with existing land developers.

4) Any land offerings should include road development prior to being made available.

5) Materials sites should be vetted by other agencies AND by local input.

6) Existing uses should be identified and protected in considering any land offering or subsurface development.

Recreation: The plan should acknowledge the CRB importance as a recreational destination for much of southcentral Alaska. It offers myriad opportunities for recreation. Recreational values, including motorized and non-motorized should be acknowledged in the plan and publicly vetted in any development scheme. The plan should encourage development of additional non-motorized areas. The plan should protect water access points. The plan should encourage cooperation with other land management entities (native, state, federal) to improve recreational opportunities in the CRB.

Delete any mention of a road to Cordova from the plan.

Oil/Gas/Mining: Some areas should be off limits to these activities. The Denali Highway area, the Eureka Summit area, and the Thompson Pass area should be removed from consideration for this type of development. ANY oil and Gas development should carefully consider the impacts of new roads into currently roadless areas.

Water Resources: Water resources should be identified in the plan. Domestic use should have priority over other uses except fish and wildlife. Development and Land Offerings must consider water use and potential impacts of development.

The plan should incorporate comments from the state Division of Forestry in regard to fuels, firewood, and forest development. The plan needs to address forest regeneration in the face of beetle killed forests.

the plan should protect our viewsheds. Every major roadway in the CRB includes scenic viewsheds. The plan should include plain language to protect these viewsheds.

Comment 81 of 86 - submitted on 04/29/2016 at 02:03 PM: Ten-mile Lake and all of the Hungry Hollow watershed and extending west to Tangle Lakes should be protected from future development (land disposal, mining, oil&gas, and other commercial) in the plan. The rationales for this include: 1) It would expand the benefits of the adjacent Paxson closed hunting area 2) Viewshed value 3) Recreational value - the length of the Denali Hwy is defined by its recreational importance. The eastern portion of the highway is unique and is road accessible. 4) This area is important Fish and Wildlife habitat. Migrating birds, caribou corridor, and the watersheds feed important salmon spawning areas.

Comment 82 of 86 - submitted on 03/19/2016 at 08:15 PM: I am a property owner at 46 mile of the richardson Highway on the east side of the road. I also frequently recreate in thompson pass, including backcountry skiing and hunting. I also own a snowmachine and use it in thompson pass occasionally. I am writing to propose a non-motorized use area to restrict helicopter and snowmachine use in an area along the road corridor. Helicopters are able to access areas away from the road corridor easily, and I believe an area should be set aside where people using human power can tour in the mountains without helicopters buzzing over them or snowmachines driving up the mountains past them. At times, it is a safety issue with helicopters dropping groups above backcountry skiers, and snowmachiners driving above backcountry skiers, both of which could send an avalanche down on the group below. The heliski companies (and snowmachiners) have a staggering amount of terrain that they can access and a small area would not significantly impact their operations. I believe a good area to set aside as non-motorized is an approximately three mile wide area on both sides of the road from approx. richardson highway milepost 35 to milepost 50. This is an area that is not conducive to snowmachining as the majority of the drainages area steep and/or brushy and dead end not providing access to terrain further back. This would minimize impacts to snowmachiners. Thanks for considering my comment. Neil Waggoner

Comment 83 of 86 - submitted on 04/29/2016 at 12:00 AM: Due to extended travel I was unable to participate in meetings recently held near my home in Kenny Lake, in which opportunity was provided for citizen comments on the Copper River Basin Area Plan Revision. I am therefore submitting my comments via email.

I have several concerns regarding the Copper River Basin Area Plan.

First, my primary concern regards the integrity of the Willow Creek watershed. For several years I have been involved in an ongoing study of the Willow Creek watershed, in which we have systematically measured such parameters as volumetric flow, water temperature, and conductivity. We also have measured ground temperatures at depths down to 2 meters, and have been monitoring groundwater, using a number of local wells and a flow from several springs. Our goal is to develop a definitive hydrologic portrait of the Willow Creek system, concentrating on factors that affect the quantity and quality of water, both surface and subsurface.

Willow Creek is a relatively small stream, indicating the aridity of the region. Unlike the major rivers nearby, Willow Creek does not receive water from snowfields or glaciers. It's flow is completely dependent upon annual precipitation. In its downstream portions, near the Edgerton Highway and southward, some of its flow goes underground into porous substrate. During dry periods, this may deplete the surface flow entirely.

Upstream, the headwaters of Willow Creek comprise multiple small channels. These channels converge into a single channel before the Creek crosses the Richardson Highway. These channels generally run from the northwest toward the southeast.

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 other fish, 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 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 regions of Willow Creek, where the flow of the multiple streams and streamlets 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 data logging monitoring station. This permafrost, by forming an impermeable barrier, likely plays a very significant role in maintaining surface water and flow in the in the upstream channels. The clearing of forest, essential to human development, would result in the melting of this permafrost, with probable 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 encroachment. 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 long-used trail follows the north bluff above the Tonsina River. This trail has long been used and enjoyed by local Kenny Lake residents - for hiking, for hunting and trapping, for skiing in the winter, and other recreational 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 several years ago through a public project, for the benefit of students at Kenny Lake School and others. My own land, which includes a bed-and-breakfast, a camp area, and a trail system, borders this area. Bed-and-breakfast guests and other tourists have found it 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.

Third, it is worth making the point as the state considers best uses of State lands in the Copper River Basin, that there is a great deal of private land for sale at the present time. This is largely the result of economic factors causing people to leave the area. In the Kenny Lake region in particular, it is also the results of the end of the homesteading era. Homesteads have been subdivided, and many lots, both small and large, are now on the market. Some of the larger parcels represent good lands for agriculture. The State may not wish to be in competition with these private land owners by placing still more parcels on the market.

Attached is a working map of the Willow Creek watershed, showing the areas referenced in my comments. Thank you for your attention to these comments and to these important issues.

Comment 84 of 86 - submitted on 04/27/2016 at 09:14 PM: Gulkana River and Richardson Hwy 27B: opposed to settlement as this is a traditional hunting and berry picking area and caribou migration path. No services for settlements i.e., refuse, schools. Settlements create trash, abandoned dwellings when there are no sources of income and people leave. 27D: would like to see this area back in state control for fish and wildlife. The big game reserve has been a sanctuary for a large variety of wildlife and spawning salmon, nesting for waterfowl and migration of caribou. Federal subsistence hunting regulations are destroying this area. Hunting pressure surrounding this area has always been significant yet the game reserve always produces a lot of wildlife and is their only safe haven during hunting seasons.

Comment 85 of 86 - submitted on 04/29/2016 at 11:54 AM: Dear Copper River Basin Area Plan Planners,

I live in Talkeetna, but I sometimes visit the Copper River Basin Area Planning Area. This is a spectacularly beautiful part of Alaska. It is important to Alaska resident visitors, like me, and to visitors from the lower 48 and the rest of the world. I have recreated on the Tangle Lakes and floated the Delta River, and I know this area better than I know the entire area. I support the efforts to create a Tangle Lakes State Wildlife Refuge, and I hope this plan will protect the viewshed of the Denali Highway within Unit 28, support the creation of a Tangle Lakes State Wildlife Refuge and recommend inclusion of this viewshed in the wildlife refuge.

All the viewsheds along the highways within this planning area are important visual resources to the public, and these viewsheds need to be acknowledged in the plan with appropriate land classifications and management protections. In particular, I ask that the viewshed of Unit 28 be closed to mineral entry.

My comments deal with the part of this plan closest to the Tangle Lakes because that is the area I know the best. When I look at the map of the entire planning area, however, I see nothing but drives to make and places to visit. Most of my recreation is hiking, birding, and boating (rafting, canoeing, kayaking), but one has to drive to places to hike, bird, or boat. And, the destination has to be natural and healthy to support these types of recreation. It is important to me that the viewshed and areas accessible from the highways be protected, but it is also important to Alaska's tourist economy. Thanks for the opportunity to comment.

Comment 86 of 86 - submitted on 04/28/2016 at 03:52 PM: Copper River Basin needs large area for wildlife habitat. Areas for hunting but also larger areas for undisturbed wildlife and plant habitat. Caribou and moose with supporting plants and animals. Wilderness areas. Also wet lands and watershed protection areas with no development, such as the head waters of Willow Creek, to protect aquatic flora and fauna, and free flowing waters.

Do not change the classification of the banks of the Tonsina river to protect the view shed and maintain current light status of trails and pathways.

Very limited development in the Copper River Basin. Keep light development to small homesteads/sites for agriculture or small businesses, residential wood cutting, and on/in already existing roads/transportation routes. No new public roadways. No industrial development such as mineral extraction, logging, or agriculture.

Keep the Tangle Lakes area intact and undeveloped and part of the Copper River Basin Plan. No large scale industrial activity such as mining.

Any development needs to have strict restrictions on water, air and soil pollution.

Could use some light development in current populated areas for more comprehensive recycling, repurposing and compost facilities for businesses and residents, such as collection/storage buildings, shipping/receiving areas, and simple composting infrastructure. Need these areas in each community. Also some light development for parks or recreation areas with limited development/services.

The Copper Basin Area is a very unique area that has seen relatively little development and still has a large part of the ecosystem intact. Migrating wild herds of animals are in decline throughout the world and wildlife in general is being pressured into smaller areas/loss of habitat. We have a special opportunity to protect this wonderful place and create an area that is unpolluted and a spiritually and physically healthy place for humans and animals. They need areas beside the National Park

Thank You,