

DNR - Mining, Land & Water Online Public Comment

Eastern Tanana Area Plan

Topic: Comments on Public Review Draft

Comment 1 of 141 - submitted on 08/15/2014 at 09:46 AM:

Once upon a time there was an engineered road up Faith Creek and Hope Creek ending at Zepher Creek. This access point to the White Mountains has been sadly neglected. The placer miners removed much of the road and flooding removed the rest. There was an old cat trail up Zepher Creek. The trail has captured Zepher Creek in many places. Wheeler traffic has caused lots of trail damage. I would like to see Faith/Hope/Zepher Creeks designated for recreational access. If it was in the plan perhaps someday the road and trail would get repaired so hikers, rock climbers and hunters would have better access. Thank You. Stan Justice

Comment 2 of 141 - submitted on 08/22/2014 at 09:13 AM:

I Have been in the process to obtain ownership of my residence at Mile 93 Tok-Cutoff Highway for several years now. It is currently slated for forestry designation under current plan. I ask that this parcel and maybe the one across the highway be re-designated to Settlement so the State DNR can make a decision to possibly sale to me.

Jeff:

The parcel you are leasing is included within the planning area for the Eastern Tanana Area Plan (ETAP). The plan proposes to designate the area including your leased parcel for forestry. The plan needs to be revised to designate that parcel Settlement so it can be sold to you (if the state issues a decision to approve a sale). In order for the plan to be revised you need to submit a comment to DNR that you are leasing the parcel and have applied to purchase it. You want to request the parcel be reclassified from Forestry to Settlement. You can submit your comment online at this ETAP planning website:

<http://dnr.alaska.gov/mlw/planning/areaplans/etap/>.

The public review period ends November 14, 2014. Please be sure to submit your comments no later than then. If you have any questions please contact me.

Ed

Comment 3 of 141 - submitted on 08/28/2014 at 12:00 AM:

I own a personal residence located at Mile 93 of the Tok-Cutoff Highway. My home is located on state leased lands under ADL30089 and has been at this location for a few decades now. I have applied to DNR to purchase the lands. At this point Lauren Rouen at Preference Rights is held up because the parcel is lumped into the wrong designation. The ETAP is currently under review and is there a way this small parcel or the two I originally leased be designated Settlement??? Lauren Rouen has all the information including my latest as built survey. Thank you for your time and consideration.

As Builts and Map attached

Comment 4 of 141 - submitted on 09/29/2014 at 09:00 PM:

PUBLIC REVIEW DRAFT Chapter 2: Agriculture and Grazing Eastern Tanana Area Plan
August 2014 2-5

MY COMMENTS ARE INCLUDED IN UPPER CASE LETTERS

Agriculture and Grazing

Agriculture

Goals

Food Security. Provide a reserve of land for agricultural use to support the local and regional production of foodstuffs necessary to support the citizens of Alaska in the future. Known as food security, this goal recognizes the potential variabilities of worldwide food production and its distribution in the future and indicates the state's intent to ensure a continuing agricultural land base. Economic Development. Diversify and strengthen the state's economy by increasing the availability of Alaska food products by:

Encouraging expanded production and availability of farm products from agricultural lands within Alaska; WHEN ECONOMICALLY FEASIBLE WITHOUT PUBLIC SUBSIDIES, AS DETERMINED BY AN INDEPENDENT/NEUTRAL PARTY.

PAGE 2

C. Agricultural Land Disposals. Agricultural land disposals shall be consistent with the requirements of 11 AAC 177. Agricultural land cannot be used for other purposes that would preclude its eventual use for agriculture. Land conveyed under this authority may only be used for agricultural purposes or for purposes that do not conflict with the use of the land for agriculture. Remote state land with good agricultural potential and designated Agriculture, but not scheduled for sale within the next 15 year period, shall remain in public ownership, continue in an agricultural designation, and shall not be used for other purposes except through a plan amendment that re-designates such areas into another land use designation. (This prohibition does not extend to non-permanent, temporary uses of agricultural land such as uses associated with permits.) A Farm Conservation Plans approved by the state shall be provided as a condition of an agricultural sale and shall meet all other requirements of 11 AAC 177. THE CLASSIFICATION OF AGRICULTURAL LAND AND THE DEVELOPMENT OF A CONSERVATION PLAN APPROVED BY THE LOCAL SWCD SHALL PRECLUDE THIS LAND FROM BEING RECLASSIFIED AS "HIGHLY ERODIBLE" OR SOME OTHER DESIGNATION THAT QUALIFIES IT FOR "PUBLIC FUNDS" (SUCH AS THE USDA CONSERVATION RESERVE PROGRAM) TO MITIGATE AN EROSION OR ENVIRONMENTAL PROBLEM.

Comment 5 of 141 - submitted on 09/29/2014 at 09:34 PM:

MY COMMENTS ARE INCLUDED AND WRITTEN IN UPPER CASE LETTERS.

PUBLIC REVIEW DRAFT Chapter 2: Fish and Wildlife Habitat Eastern Tanana Area Plan
August 2014 2 13

Fish and Wildlife Habitat Goals Maintain and Protect Publicly Owned Habitat Base.

Maintain in public ownership and protect habitat for fish and wildlife resources sufficient to conserve a diversity of species to support commercial, recreational, or traditional uses on sustained yield basis; or protect a unique or rare assemblage of a single or multiple species of regional, state, or national significance. Ensure Access to Public Lands and Waters. Ensure access to public lands and waters and promote or enhance the responsible public use and enjoyment of fish and wildlife resources. EASEMENTS AROUND AND /OR THROUGH NON-PUBLIC LAND WILL BE PUBLICIZED _____ . (WHERE EXACTLY I DO NOT KNOW BUT THIS SHOULD BE DONE AS A PUBLIC SERVICE).

PAGE 2 A. Mitigation.

DNR shall consider replacement or enhancement of fish and wildlife habitat when steps 1 through 3 cannot avoid substantial and irreversible loss of habitat. The ADF&G will identify the species affected, the need for replacement or enhancement, and the suggested method for addressing the impact. In those instances when replacement or enhancement is not feasible, DNR will consider the provision of substitute resources or environments. DNR will consider only those replacement and enhancement techniques that have either been proven to be, or are likely to be, effective and that will result in a benefit to the species impacted by the development. Replacement or enhancement will be required by DNR if it is determined to be in the best interest of the state either through the AS 38.05.035(e) or other authorization process DNR SHALL CONSULT/COLLABORATE WITH ADFG TO DEVELOP A COMPREHENSIVE ATV/ORV PLAN TO MITIGATE THE HABITAT AND ENVIRONMENTAL DAMAGE CURRENTLY BEING CAUSED BY UNREGULATED USE OF THESE VEHICLES ON MOST OF OUR PUBLIC LANDS.

Comment 6 of 141 - submitted on 09/30/2014 at 12:00 AM:

"I'm just here to discuss the Island Lake area and the Gardener Creek areas. Those are both used for tribal traditional hunting native grounds. We use those for moose hunting, for wood cutting, for trapping, for fishing; all of the above. I really would not like to see that be portioned up and sold off to anybody else because we still use that as traditional native hunting grounds, and it's been used as traditional native hunting grounds for the past thousands of years and I just really think that would be a wrong decision to portion that up and start subdividing it up, selling it up to people from all different places when we still use those areas as hunting grounds. That's the only thing I'd have to say."

Comment 7 of 141 - submitted on 09/30/2014 at 09:06 AM:

The land use plans are an exercise in futility if state agencies choose not to enforce the regulations.

The Agricultural Lands involved in the Delta Barley Project were intended for agricultural purposes only and thus protected by regulation and covenants to prevent extensive subdivision and housing projects.

Unfortunately, these regulations have not been enforced and the lack of enforcement is now considered tacit approval by the State of Alaska. More subdivisions are sure to follow.

How can we possibly consider this plan as a valid instrument for land use in Alaska?

Comment 8 of 141 - submitted on 10/09/2014 at 07:06 AM:

A long term 50 year lease for development for recreational purposes was issued for the Cleary Summit area (ADL 37). The lessee defaulted on the lease and at public foreclosure auction, five people (Cleary Summit Investors LLC) with improved properties contained within this lease purchased the remaining leasehold interests with the SOA with the understanding expressed by representatives of DNR that the DNR would honor a request for purchase with preference rights. An application with fees attached was presented to DNR immediately thereafter. This was followed by 14 years of inaction on the part of DNR to achieve this preference right sale due to no full time party in the DNR being responsible for follow up on this matter even though continuous efforts were made by the new lease holder, Cleary Summit Investors LLC to further this process. All efforts were met with the response of, "there is 14 years left on the leasehold interest, so what is the hurry?" In 2013, the application was rejected by DNR in that it may conflict with the ETAP. As there are many full time residential and recreational improvements on the properties CSI, LLC had intentions of transferring the properties to the sub leases upon completion of the preference right process. Therefore, we respectfully request that his area located within the ETAP continue to be designated as an recreational area and that a preference sale or new long term lease be issued by DNR for the benefit of the lessee and sub lessees.

Comment 9 of 141 - submitted on 10/10/2014 at 12:00 AM:

My name is Tom Dillon. My wife Michelle and I have a small cabin on Cleary Summit. This place holds some of my fondest memories growing up... My brother and I learned to ski in the 80's on the bunny slopes of the adjacent Cleary Ski Hill (web link: www.alsap.org/clearysummit/clearysummit.htm) by snowplowing inside my Mom's skis and grasping a ski pole that she held horizontally in front of us. On sunny Spring days we had picnics with friends on one of the less traversed mogul-runs. Skiing there was affordable and we went every chance we could...

In the Summers, we would drive up to a cabin my folks built in the 70's at 42 Mile Steese on the Chatanika river. We often stopped at the Summit to pick the tart blueberries that grow so well under those stunted pines. There is nothing better than the crisp clear air and views to what seems like a Northern Infinity.

When I had some money saved, I jumped at an opportunity to build something of my own at Cleary. With the help of Brent and Tom, I found a lease to buy and was welcomed to the close-knit community. Summit Telephone shared half of their driveway and another neighbor Jim hauled some tailings in for me to continue a little trail to my site. Jim was dealing with cancer at the time, but still helped me out. Jim passed on in 2013.

My Aunt Judy became acquainted with (and later married) the late Fairbanks City Attorney Pat Cole and he offered to let my soon-to-be Wife and I stay at his A-frame (also on Cleary) while we worked on our place. At Pat's Celebration of Life in January 2014, my Wife wrote a poem which I read to everyone. It had the couplet:

"Pat loaned us his Cleary Cabin awhile We burned right through his firewood pile" -it got a few laughs...thanks Pat.

My Wife and I now have a Son and Daughter and we made some new memories this year at "The Box" (thats what we call our place because its kind of Modern

Looking)...it's constructed from building materials recycled from my late Father's Fairbanks-Based Construction Company which I'm very proud of. Anyhow, Michael, Athena, Michelle & my Mom picked enough blueberries for 4 pies while Daryl and I did some cabin-maintenance. When the kids are a little bigger, we will have to put them on some skis over at Mt Aurora (Skiland)!

In Short, I'm hoping to keep building new memories at Cleary with Family, Friends and Neighbors as we've been doing for at least 30 years...

Comment 10 of 141 - submitted on 10/14/2014 at 11:41 AM:

we don't need any more outside hunters in our unit. That's all they want the land for period!!(cc)!!!!

Comment 11 of 141 - submitted on 10/14/2014 at 11:50 AM:

I strongly oppose the state selling land in the areas around Northway at Deadmans Lake and Paradise, I have hunted this area, as have my children and my parents and grandparents before me for hundreds of years. This is not in the best interest of Northway and its tribal members to sell this land. Please respect our request.

Comment 12 of 141 - submitted on 10/14/2014 at 12:07 PM:

I strongly oppose the State sale of land in the deadmans lake and paradise areas in Northway listed on the Eastern Tanana Area plan. WE the tribal members of north way have used these areas for hundreds of years for hunting, fishing and berry picking. These areas should not sold. thank you.

Comment 13 of 141 - submitted on 10/14/2014 at 12:44 PM:

I am against selling the land!!! Us local natives use that land for hunting and fishing and substance lifestyle.

Comment 14 of 141 - submitted on 10/14/2014 at 12:52 PM:

I HIGHLY OPPOSE selling the land as we TRADITIONALLY use this land to hunt, fish and trap. I'm against selling the land. This is where our children slide every Winter also (Paradise Hill).

Comment 15 of 141 - submitted on 10/15/2014 at 11:21 AM:

I don't agree with the selling of the land... we all use that land for hunting, fishing, and access to our hunting cabins. we also use that area for local activities and I strongly disagree with you guys selling that land!!!!

Thanks

Comment 16 of 141 - submitted on 10/15/2014 at 12:43 PM:

I don't agree with selling any land around our areas where we hunt and live off of for survival. . WE USE THIS PLACE FOR MANY YEARS SO OBVIOUSLY I DISAGREE WITH YOU GUYS SELLING THAT LAND!!
THANKS.

Comment 17 of 141 - submitted on 10/16/2014 at 12:00 AM:

Recently, representatives of the Department of Natural Resources presented on the Public Review Draft of the Eastern Tanana Area Plan in Northway, Alaska, and surrounding communities. Included in this plan is the proposed settlement and land sale of two particular areas located near Northway at Deadman Lake and Paradise. Northway Natives, Incorporated and Northway Village Council strongly oppose both

proposed land settlement areas. It is our understanding that one of the proposed locations will serve 'remote cabin sites' and one location will service as a 'subdivision', and that both of these locations will have a highly seasonal use, primarily utilized for hunting purposes.

The proposed land settlement encompasses traditional hunting areas that have been used for years by our community. Paradise is one of the most highly utilized hunting areas for Northway; a community that still thrives off of traditional use and subsistence in a part of Alaska where an economy is nearly non-existent and there are few year round jobs. Not only does the proposed land settlement and future sale allow non-community members and non-residents to permanently impose on our main hunting area, which supports our families and community, but it also brings little economic benefit. This is not the best use of State land.

Northway Natives, Incorporated and Northway Village Council do not support the proposed land settlement and sale and recommend that it not be approved by the State of Alaska Department of Natural Resources.

Thank you

Letter also signed by President of Northway Village Council

Comment 18 of 141 - submitted on 10/16/2014 at 06:04 AM:

I would like to see the lands mentioned become available to settlement. This could encourage business and better economic development in those areas. I grew up at Gardner Creek (MP 1247) and would welcome the opportunity to build a home and retire there. Under our current Land Settlement Act only a handful of folks live in those areas and the way is blocked for further development. Restrictions & guidelines should be in place for the development of these lands to encourage positive growth.

Comment 19 of 141 - submitted on 10/16/2014 at 04:34 PM:

It's our hunting ground from way back in the days and I disagree with any land trying to be bought from other people. So, I strongly disagree with your decision. Thanks!!

Comment 20 of 141 - submitted on 10/16/2014 at 04:38 PM:

I do not hunt any more, but my kids do and they need this land for meat. It's been hunting land for years and years. I oppose any land sales.

Comment 21 of 141 - submitted on 10/16/2014 at 04:43 PM:

This is our hunting grounds our parents, grandparents, grandma, grandpa have been using this for many many years and from way before our time. This land is for our grand children and our kids. We disagree with the decision making and we need this land and not for sale. This is our traditional territory.

Comment 22 of 141 - submitted on 10/16/2014 at 04:52 PM:

Your proposed subdivision at Paradise hill is a bad idea. I am totally against it. I have been trapping and hunting that trail for 37 years. I have had traps, snares and fur stolen and had traps, snares and fur destroyed by people not from around here. I have had items stolen from both trapping cabins, one is marked on the map at the end of the trail. I don't need a bunch more people using the trail. I would end up catching children and pets in my traps and snares and I don't want that. I don't need

more people crowding me when I go hunting either. It could also give access to people to try to smuggle stuff across the border and I don't want that on my trapline period. (It has happened before) I also know that the people that selected their Native allotments on that trail didn't pick that spot so they could be in the middle of a subdivision. This proposal would ruin my livelihood. There are a lot of locals that do their subsistence hunting here. It is a bad idea and needs to be scrapped. The other bad idea is the proposed spot by Deadman lake. Our family has been trapping that trail for 40 years. A subdivision on that trail would end our trapping there. You need to drop both of these selections, we don't want them.
Michael James

Comment 23 of 141 - submitted on 10/16/2014 at 04:55 PM:

I totally oppose any land sales as this is OUR traditional hunting, trapping and fishing areas. Do not sell any of our lands. We need all this land for our children, grand children and great grand children.

Comment 24 of 141 - submitted on 10/16/2014 at 04:59 PM:

DO NOT SELL our land we use for our traditional hunting, trapping and fishing areas. I highly oppose any land sales.

Comment 25 of 141 - submitted on 10/16/2014 at 05:00 PM:

I oppose any land sales as we hunt, trap and fish on these lands. DO NOT SELL no land at all, we reject any land sales. We need this land for our kids, grand children and so forth.

Comment 26 of 141 - submitted on 10/16/2014 at 05:04 PM:

We, as residents of Northway and as for myself, Gerald M. Albert, really am concerned about lands sales in our area due to our hunting grounds and subsistence use, even though the state owns the land, we as a community depend on those areas for food, we hunted in those areas for years and even before our time our ancestors hunted them. If there is to be a land sale, let it happen 10 miles away from the road system, we use the lands next to the road for years. I as a resident of Northway object to the land sale and if anything else, look at local organizations first or just not sell at all. Why would the state want to sell land? We need to communicate on why and what's the purpose of this, meet with us. I am one that depends on food from the land and them 2 places are the 2 places I rely on. For your considerations, think about how this will hurt us and maybe the state. Not besides the highway. Look at selling lands about 10 miles away from the road system. Thank you!!

Comment 27 of 141 - submitted on 10/16/2014 at 05:19 PM:

I highly oppose any land sales because we hunt, trap and fish here. I do not want any land sales at all. If they want to sell land here look at our local people and let us have 1st priority over non-residents. This is our traditional territory and we all reject any land sales. DO NOT SELL OUR LAND!!!!!!!!!!!!!!

Comment 28 of 141 - submitted on 10/16/2014 at 05:20 PM:

I oppose the proposal to sell land at Paradise and Deadman Lake. I was born and raised in Northway and I don't feel that this land sale brings any value to that area or the community. It isn't the best use of state land.

Comment 29 of 141 - submitted on 10/17/2014 at 09:15 AM:

I am 61 years old and a life long resident of Northway. I have raised four kids here

and worked as a health aide for many years. I currently serve the Northway community as a board member on the Northway Village Council. The Department of Natural Resources representatives presented in the end of September in Northway about the Eastern Tanana Area Plan and the proposed land settlement and sale at Deadman and Paradise. This has caused much concern throughout Northway. The proposed land settlement areas are located near and on traditional hunting areas by the people of Northway. We understand that this area was chosen for a land sale because it was specifically requested and also because it has favorable geographic aspects like road access. This area is very active moose hunting territory for the community. Selling this land to non-community members and non-residents sets the stage for overuse of game and other conflicts.

Northway residents have always relied on subsistence and traditional use of the land, as they will into the future. The Department of Natural Resources must consider the current use of game and land by the current community near the proposed land sale areas before attempting to satisfy the wishful desires of non-community and non-resident hunters looking for a road accessible hunt. This does not seem to have been considered in this long term management plan. I recommend that the state not approve the land sales at Deadman Lake and Paradise.

Comment 30 of 141 - submitted on 10/17/2014 at 09:51 AM:

I oppose the land sale near my village of Northway at Deadman Lake and Paradise. I am an enrollee to Northway Village Council and have hunted and continue to hunt in this area like many others in Northway. It is hard to find full time employment in Northway and surrounding communities and hunting and fishing is still a part of every day life here. Selling this land does not add any economic benefit to the state or community except for the actual land proceeds. It would only place people who are not community members who can afford to buy land on our top hunting areas that we rely on.

Comment 31 of 141 - submitted on 10/17/2014 at 11:15 AM:

I do not support the proposal to sell land at Deadman Lake and Paradise as part of the ETAP. I grew up hunting near Paradise & Deadman with my family throughout the years and now I often bring my own family to hunt in that area. I am raising my son to learn the traditional hunting and fishing that I was taught in our Athabaskan culture. There are limited jobs in Northway and whatever income Northway people receive is for things like fuel and power. Our community would not survive without hunting. Paradise and Deadman are part of our main hunting areas. The state's plan to bring in outside hunters who would buy lands in these two locations would negatively impact our traditional hunting AND the lives of the Northway community.

Comment 32 of 141 - submitted on 10/17/2014 at 11:41 AM:

I would like to ask the State Department of Natural Resources to remove the land sale at deadman and paradise. After hearing about this land use plan in late September at a public review meeting in our village, our entire community was instantly concerned. We were concerned about the Dept of Natural Resources idea to offer seasonal recreational land for sale in our community's main hunting areas. We have relied on hunting and fishing all of our lives. My family continues to today. It is confusing why the state would feel that it was enough of a benefit to include in the long term plan. There is no long term benefit to the Northway community or the state. The only people who would get a benefit are those who made the request for

land in this area. Is satisfying these very few non-community and non-resident individuals with a land sale more important than sustaining an entire community and the many State residents needs who live here? I don't feel that it is.

Comment 33 of 141 - submitted on 10/17/2014 at 01:24 PM:

The Department of Natural Resources should immediately reconsider opening up land sales at Deadman Lake and Paradise. These two areas are located on and near traditional hunting areas for our Upper Tanana Athabaskan people of Northway. Any long term plan of the Department of Natural Resources for land management should consider current use. This area has high traditional hunting use and directly serves the Northway community which depends on hunting and fishing.

Comment 34 of 141 - submitted on 10/17/2014 at 04:24 PM:

I do not agree with the idea of a land sale in the Northway Community by Paradise and Deadman Lake.

Offering land sales to a few individuals who have the finances to buy land and build cabins and camps will also be able to buy ATVs and other gear contributing to an easier hunt. There would be a large increase in animals harvested here and it would be increased competition with the community for moose and caribou hunting. The state is acting irresponsibly by allowing a land sale with no benefit to the state or economy to occur. Not only would it provide no benefit, but our community would have lessened chances at successful hunts against all of the added people.

In our community, we share and work together. We do not over hunt and we use all we can. This would directly affect how our community operates as far as providing for our families. Paradise and Deadman Lake are part of our traditional hunting areas and are areas which affect game in other subsistence use areas. We rely on our hunting. Please do not open a land sale in one of Northway's hunting areas that supports the community.

Comment 35 of 141 - submitted on 10/18/2014 at 12:24 PM:

I am a youth in the Northway community who takes care of my family with hunting. I am worried that selling Paradise and Deadman Lake land will hurt my future and the future of my village.

Comment 36 of 141 - submitted on 10/18/2014 at 12:40 PM:

I oppose the land sale in Northway at Deadman Lake and Paradise in the ETAP. My family has native allotments located near the land sale area. The allotments were chosen long before the ETAP was established. The proposed land settlement sales would affect native allotments and traditional hunting.

Comment 37 of 141 - submitted on 10/18/2014 at 03:05 PM:

I don't think that selling land in the Northway area is beneficial to the community or the state. My family has hunted in both areas mentioned in the land sale. I currently live in Fairbanks and visit my family and community in Northway often. The population of the community varies around 180 residents and there are enough full time jobs to provide about 11% of the population with work. Most of the people here rely heavily on subsistence.

Comment 38 of 141 - submitted on 10/18/2014 at 03:36 PM:

The area that the state is proposing to sell at Deadman and Paradise has always been used by the Northway community. I have hunted this area in my younger years.

It was hunted before me by others in our community and continues to be hunted today. I think the DNR should reconsider adding additional hunters to an area in which the fish and game are utilized well and of which also supports Northway.

Comment 39 of 141 - submitted on 10/18/2014 at 03:43 PM:

The DNR's presentation in Tok and Northway included mention of land sales. I don't believe that this is a good idea for our community. I live in Tok but my family is from Northway. Northway is a traditional native community that depends on their moose and caribou hunting in the two areas that you included in your plan to sell. It wouldn't help Northway or Tok to sell property here. There is also not much benefit for the state.

Comment 40 of 141 - submitted on 10/18/2014 at 04:28 PM:

I oppose the Northway land sales. This land is regularly used by the community for hunting and trapping for self sufficiency. We have been living the subsistence lifestyle for a long time in this location. The state should not sell lots in the middle of areas that we have used for years and years to people who won't help the community at all and have the financial ability to afford this.

The cost benefit comparison between selling land and our community's ability to provide for itself is non-comparable. The small amount of money the state would bring in via land sales does not even come close to comparing to feeding an entire community over a long period of time that does not have a current economy or the potential for one in the future.

Comment 41 of 141 - submitted on 10/18/2014 at 05:14 PM:

The state should reject the DNR's proposed plan to sell subdivided lots at Paradise and remote cabin sites at Deadman. The influx of hunters and individuals who would show up in the area would hurt the resources (moose, ducks, caribou, berries, etc.) that the community uses.

Comment 42 of 141 - submitted on 10/18/2014 at 05:51 PM:

Please reconsider selling land in our community Northway at Deadman & Paradise. I grew up in Northway and I am also a council member of the Northway Village Council. Our community has used these lands to hunt and gather food for as long as I can remember. My family uses these lands to hunt & fish, which provides for our community as well as our families. Selling these lands would only hurt our community.

Comment 43 of 141 - submitted on 10/18/2014 at 06:11 PM:

The part of this plan that I disagree with is selling Northway lands to recreational users. The areas that would be sold are used by the Northway people for fishing, hunting, berry picking, gathering roots and other traditional use. My family has hunted at Paradise and Deadman for a very long time and depend on their hunting. Please do not open this land up to sell.

Comment 44 of 141 - submitted on 10/18/2014 at 07:09 PM:

I would ask the Department of Natural Resources to remove the proposed land settlement and sale at Deadman Lake and Paradise. I would like the Department of Natural Resources to understand that the Paradise and Deadman lands are main traditional hunting lands which are being used efficiently now. Our community is careful not to overhunt. If hunters from urban areas are able to purchase lands and permanently move within our main hunting grounds, it creates a situation that

would likely result in overuse. My family's native allotments are located in close vicinity to Paradise and Deadman so I am also quite concerned about how this would affect the fish and game at the allotments.

Comment 45 of 141 - submitted on 10/18/2014 at 09:30 PM:

We trap a trail that goes from the Alaska Highway to the Canadian Border slash that stretches 15 miles in the proposed subdivision at Paradise. We have trapped it for over 25 years. We were both born and raised in Northway and Tok and have lived in this area for 48 years. This area has been a well producing spot and that if it was to be opened up as a subdivision, this would likely create issues with people straying onto the trapline. We have not had any issues with people transversing the trapline in the winter months. We picked this location for its remoteness. The first three miles of the proposed area covers the trapline so therefore we would be trespassing on someone's private land if this was approved. We believe that we provide a valuable benefit to the eco system because of our trapping practices. If there were other people in the area, it would directly affect the animal population so we highly oppose the land sales.

In addition, we don't know how the influx of people would affect the animals, fur bearing and game animals, as we don't know how Canada manages their fish and game so close to the border.

We oppose the subdivision and remote cabin site at Deadman & Paradise.

Comment 46 of 141 - submitted on 10/19/2014 at 01:22 PM:

My grandmother has native allotments within the land sale area at Northway and our family has used that area for subsistence reasons before Alaska was a state. This area is traditionally used and I oppose selling it because it would hurt my family and the Northway community.

Comment 47 of 141 - submitted on 10/19/2014 at 01:30 PM:

I'm concerned that the land sale in Northway will hurt the upcoming youth in our village. I am 18 years old and myself and others are learning to hunt and carry on the culture and take care of our community. It would hurt Northway quite a bit if the state sold land to outside people who want recreational use land and want to come down and hunt for the fun of it and who could take the animals we need.

Comment 48 of 141 - submitted on 10/20/2014 at 01:56 PM:

I oppose the land sale near Deadman Lake and Paradise because that is where we hunt and fish. We gather roots, mushrooms and berries in those areas. I remember hunting trips w/my parents when I was a little girl. Berry and mushroom picking. Fishing trips. Going to camps along the highway where our people sit up hunting camps. If the State proceeds with Land Sales than those areas could be closed to us and putting our traditional life style in jeopardy. Our way of life, gathering food. With prices sky rocketing and jobs being scarce we depend on moose and caribou and putting away fish, roots, berries for the winter. I grew up here in Northway and raised my family here, we live in two worlds but subsistence is a major and vital part of our life. We also gather birch bark and spruce roots to supplement our income. With land sales our moose population and caribou population could decrease and make it harder for us to survive therefore I am totally against the proposed land

sale!

Comment 49 of 141 - submitted on 10/20/2014 at 08:07 PM:

In response to your proposed subdivisions near Deadman lake and Paradise hill. My family and myself have been hunting and trapping in and around these area's for over 40 years along with a lot of the local natives. These subdivisions would completely eliminate any access to all of these area's to the locals who have been using the area to feed thier families for all these years. It would also invite many more people to further deplete the already low populations of wildlife there. You are obviously aware of the native allotments in the Paradise area. These allotments were chosen because of their remote locations and are regularly used for subsistence purposes. Putting subdivisions all the way around their land would totally shut down all of their activities in all of these locations. It would shut down my trapline in the Deadman area, Glen Marunde's trapline at Sweetwater creek and my brothers Steve and Mike's traplines at Paradise hill. Howard Fix would lose his hunting area. Bernard Hildebrand would lose his hunting area. My entire family would lose our hunting area. Duane Stone would also lose his hunting area. These subdivisions would devastate a large number of the locals who have lived in the area their entire lives. I sescerely that someone will see the damage it would to the locals and their way of life and put a stop to it.

Comment 50 of 141 - submitted on 10/20/2014 at 09:36 PM:

Our family learned recently that the DNR had included selling land near our community in this Eastern Tanana Area Plan. We hunt and do other traditional activities at Paradise like gathering roots, picking mushrooms, and hunting. Others in our community use Deadman for hunting and traditional activities. As a young person with two new babies, their father and I worry about how selling this land would harm our village.

Comment 51 of 141 - submitted on 10/20/2014 at 09:38 PM:

I oppose the land sale near Northway for cabin sites and recreational, subdivided lots. I have grown up in Northway and hunted this area. Northway relies on their traditional hunting and selling cabin sites and recreational lots to people who don't rely on hunting would hurt the chances of those in the Northway community in their hunts who actually survive on what they catch.

Comment 52 of 141 - submitted on 10/22/2014 at 04:00 PM:

I am from Northway and oppose the land sale at Deadman Lake and Paradise Hill. Both areas experience a lot of hunting use already and selling recreational lots would have a lot of negative implications for the entire area including major stress on the caribou and moose numbers. This is not a good idea.

Comment 53 of 141 - submitted on 10/23/2014 at 11:59 AM:

I oppose the land sale at Deadman Lake and at Paradise Hill. I was rasied at Deadman Lake for 18 years and there are too many people hunting there already. I can't imagine adding even more people who aren't even from our community in those spots.

Comment 54 of 141 - submitted on 10/23/2014 at 02:54 PM:

I oppose the state proposing to sell land in Northway at Deadman Lake and Paradise hill. My family has hunted here as many do. Getting a good job with benefits is rare in Northway and that means a lot of us rely on subsistence and traditional use. The

Northway people are proud that they can take care of themselves with hunting and fishing. Although the land sales are for remote cabins and recreational lots we know that this will bring the interest of many hunters who aren't from the community. The areas really can't sustain too many more hunters. Each family has their spot to hunt and fish and shoot ducks at and we respect that and we don't take too much of any of these. New hunters who buy recreational lots and cabin spots could AND HAVE over hunted our area. There are too many hunters who show up here who aren't from Northway right now!!! Please remove the land sale.

Comment 55 of 141 - submitted on 10/24/2014 at 12:00 AM:

Quartz Lake Shaw Creek Flats Park Proposal

I have taken the initiative as a Quartz Lake cabin owner, and as a professional wildlife ecologist in organizing a committee to work together on developing a proposal to create Quartz Lake-Shaw Creek Flats State Park. The proposal would expand the 600 acre Quartz Lake State Recreation Area to include the entire watershed of Quartz Lake, the waters of the lake itself and much of the Shaw Creek Flats. The proposal would ultimately go before the State Legislature to be voted on.

Quartz Lake and the Flats are a wetland system hydrologically and ecologically interconnected. Presently responsibility for management of fish, wildlife, and their habitats within this area, which is primarily state land with private inholdings of cabins around the lake and a few other inholdings, is spread through three state agencies with some federal oversight largely related to migratory birds. In this area the state constitution mandates that DNR has primary management responsibility for fish and wildlife habitat, ADF&G has primary responsibility for assessing and maintaining fish and wildlife populations and allocation of their sustainable harvest, and DEC has primary responsibility for maintaining quality of the waters in the area for human health and well being as well as the health and well being of the fish and wildlife of the area. Under this fractured tripartite responsibility no single state agency takes responsibility for overall management of the fish and wildlife habitats of the area or in protecting the wellbeing and productivity of critical habitats in this wetland complex. Habitat management has been totally ignored by state management agencies and none of the three agencies have trained staff to assess changes in habitat brought about by:

- 1) Climate change (drying of the wetlands and increasing hazard from wild fire, and thawing of permafrost which accelerates draining of wetlands)
- 2) Habitat damage by airboat use in and adjacent to lakes and wetlands (especially Quartz Lake accelerating drainage of small lakes and marshes, destruction of nesting habitats, direct killing of young flightless water birds, accelerating permafrost thawing, preventing beavers from raising the water table through dam building with negative hydrological consequences of decreasing water flow from the Flats into Quartz Lake). Uncontrolled use of the four-wheelers during spring when ground frost is thawing to set up bear baiting stations causes excessive rutting and erosion of trails leading to silting of critical lake and stream edge habitats. Shaw Creek itself and its tributaries provide spawning and rearing habitat for chinook, chum, and coho salmon, grayling, burbot, and other fish. Beaver dams play an essential role in helping to maintain water levels in lower Shaw Creek, one of the major fish over wintering and rearing areas in the upper Tanana Valley.

Expanding and joining Quartz Lake and much of the Shaw Creek Flats to form a full

state park would place primary responsibility for management and protection of the habitat of this complex and biologically productive area within State Parks, as a single park. This is now the case with other state parks in the state such as Chugach and Wood Tikchik State Parks resulting in more clearly defined management responsibility, more secure protection of critical wetlands, and better assurance of the sustained high productivity of the state's wetland habitats.

The Quartz Lake Shaw Creek Flats Park proposal Committee is composed of those with strong interests in the area, inclusive of those from the wide range of user groups, recreational; sport and subsistence hunting, fishing, and trapping; cabin and other land owners; commercial interests, boat rental etc.; scientists who have ongoing ecological and other investigations there; archaeologists and historians who investigate prior human uses and the human cultures who have lived around the lake and flats during the past 14,000 or more years. Protection of the Quartz Lake and Shaw Creek Flats wetland complex within a state park appears to be the best way to assure the continued public use of this rich wetlands complex, the future sustained harvest of its fish and wildlife resources, interpretation for the visiting public of the complex ecology of these wetlands, and their appreciation and use by future generations of Alaskans. The following individuals are working with me (David R. Klein, dklein7@alaska.edu) on this park proposal committee:

Judy Hicks, Delta school teacher, hicksjudyoink@gmail.com Melinda Eagleston, Delta school teacher, mde@alaska.net Josh Reuther, Fairbanks archaeologist with the Museum of the North, John Beckley, North Pole trapper and Shaw Creek Flats cabin owner, jbinthewind1@Yahoo.com Dean Seibold, Quartz Lake concessionaire, dog musher, fishing guide, deabnseibold@hotmail.com Wendell Shiffler, Fairbanks, retired high school science teacher, Wendell@arcticwintergames.org

Comment 56 of 141 - submitted on 10/24/2014 at 12:00 AM:

I live in Cleary Summit. Investors lease land from the state (DNR). That makes me a sublesser. I believe that all will work out for the best. I love living up there and feel invested in a place to live (my home). I am concern about having to move. Honestly, I could not afford it. I would prefer to buy land at fair market value (if assessment price & lease (C.S.I.) price are of reason and wrote up in legal way on paper. If not: to have lease renewed long term again and have legal way of sublesser being reasonable and in a legal way. I want to thank the people (DNR the state and Cleary Summit Investors for the good of the work and effort and cooperation of this project where I live (HOME).

Comment 57 of 141 - submitted on 10/24/2014 at 09:13 AM:

I'm not sure where to begin but I would just like to say that I oppose this proposal. Reasons important to me as to why are the facts that my family and I have hunted the areas around Northway and up to the Canadian border my entire life and don't think it would be fair to us to allow others to come in to the area and hunt on lands we have hunted for generations. Do I feel a sense of entitlement of the lands yes I do. I don't believe farmers down south or on a farm anywhere would appreciate me going onto their land and eating their crops. I do understand that the land belongs to the state but where was the state before when my ancestors were already hunting on that land. Another reason I find it wrong is the fact that eventhough we now have stores and all this welfare and food assistance I know allot of people in my area still rely heavily on subsistence to survive the cold winters because money what little

some have needs to be used for everyday things like water utilities and heat and electricity. Hunting moose and other game helps them save money for that. More hunters in the area will also just cause the moose population to dwindle along the highway and areas that are accessible from the highway which a lot of people hunt because they don't have the money to buy things like four wheelers and side by sides. So with that I just ask that you not allow these cabin permits to be issued.

Comment 58 of 141 - submitted on 10/25/2014 at 11:21 AM:

I would like to submit a comment opposing the land sale at Deadman Lake and Paradise included in the ETAP. I have raised my kids here as well as my grandkids. My family has relied on subsistence throughout our lives. We have hunted in the proposed land sale area like a lot of other Northway residents. In our culture, we make sure that we don't hunt too much and hurt our chances of a good hunt in the next year. The people here work together in that way. We all have our areas we hunt or that our families have used for a long time and we respect each other. If the land is sold to all of these people, we will have to change how we work together and have to compete with the new hunters to the area who won't care about our community. This will result in hurting moose and caribou numbers. As a Northway Village Council board member that is vested in helping my community and planning for the future - I feel strongly that opening land sales would permanently hurt this community that relies on subsistence. There really isn't a lot of good that this land sale would bring to the area.

Comment 59 of 141 - submitted on 10/25/2014 at 01:03 PM:

"We, Andrew Tyone and Vivian Vincent, would like to oppose the proposed land sale in Northway at Paradise Hill and Deadman Lake. Our native allotment is located near both land sale areas. We do not currently live in Northway but our family is from the area and we maintain very close ties with our Northway family and community. We traditionally subsisted off the land in those areas and that is why our family's native allotments are there.

We know that they are still a very cultural community that depends on traditional hunting and cultural use. There are few jobs in Northway. People there fish in the summer. Berry picking and gathering birch bark and roots is also a major part of the Northway life in the summer months. They hunt ducks & fish hard in the summer/fall. Caribou hunting is a huge part of supplementing their food source, especially when moose hunting isn't successful. With the increased population of the state in urban areas like Fairbanks and Anchorage, people are looking to drive further and further away from their areas in search of their dream moose hunt or caribou hunt. But the people who live in the areas far from these urban communities don't have employment or credit cards or stores with fair prices.

Living and hunting in Northway is not a recreational experience, it is their life. It is a life this village has lived for centuries. It is very sad that the DNR would use the requests of many urban hunters who understand how to utilize the DNR system to overwhelm those who subsist off the land and were here long before these urban hunters ever knew about Alaska and were not included in any discussion of how and where urban people could "recreationally use" lands near the community. The community also is closely related and tied to the communities across the Canadian border. The land sale is within 30-40 miles of the first Canadian community where hunting also takes place.

We are concerned that the state chose this recreational land sale area without performing a long term study on how it would hurt the caribou herds and moose. We know that an area which can be accessed by road like Northway would be inundated by urban people by word of mouth as it has a million times before around the state and that it would hurt the moose and caribou population for Northway and our family across the border. We would ask that the DNR remove the deadman and paradise land sale for this long term plan. It does not serve the greatest amount of people, and does not utilize state land in the best way.

Comment 60 of 141 - submitted on 10/25/2014 at 01:14 PM:

I oppose the proposed land sale in Northway at paradise hill and deadman lake. Our village depends on using these traditional hunting areas. A lot of our village is hard to use for us because it has sunk since our village picked it in the land claims or has a lot of military contamination. There are just a few jobs here and a lot of us depend on subsistence.

Paradise and deadman lake remain our best traditional use areas. They were always used by the upper Tanana people. We still use it and live off of it. We trap and hunt here. Even as a young person from this village I have noticed that a lot of non-community people are showing up here more and more every year.

Because we survive on subsistence hunting and trapping, selling these lots to people for "recreational use" will destroy how our community takes care of itself. The state will please just a few guys who want to have a recreationaltrip to permanently, negatively impact a village and community who cares for and uses the land to survive. This needs to be analyzed further and there needs to be a discussion on how the state will manage the sheer amount of people that will show up in a land sale scenario. And also how they will affect our land and animals. And half of my family is from Canada, so how does this affect our Canadian family so close to the land sale area too. This needs to be removed from the ETAP at this time.

Comment 61 of 141 - submitted on 10/25/2014 at 03:09 PM:

I oppose the land sales near Northway because Northway residents depend on hunting and fishing. They currently use the land sites in the proposed etap constantly. I was raised in Northway and left to pursue a full time job. But I have a lot of family there that lives the native life style or doesn't have the education or skills to leave and get a great job. To them, living off the land is how they survive and a way of life. There are a lot of people who are showing up in Northway who are well off and just want to have a great road hunt and they take food from those who really need it. Adding all of these hunters would hurt the moose, fish and bird populations. It is hard to think about the things that could happen to my village if the land sale goes through. It is not the right thing to do.

Comment 62 of 141 - submitted on 10/25/2014 at 06:13 PM:

I don't think the state should offer the land sales near the village of Northway. Those areas are used by the entire community, year round. There is a growing amount of Fairbanks and anchorage hunters who are already over hunting that area. Northway has to deal with this now and it is an extremely difficult issue for them to manage. Allowing non residents and non-Alaskans to permanently build camps here is hard to understand. If Northway people rely on their fishing and hunting, and have a problem with non community people over using the good areas near the village that

Northway has used for many years to survive, why would the state open this area to even more over use?

Comment 63 of 141 - submitted on 10/25/2014 at 06:29 PM:

I feel that the proposed land sales as part of the etap at Northway should be removed because: 1) the land used to capacity currently by the Northway community and could not handle additional users of any type. 2) the Northway people are very subsistent. There are few ways to make a living in Northway and most people need the moose and caribou meat to survive. 3) I don't feel that there is enough information on the current use of these areas to title as recreational use and remote cabin lots and sell.

The repercussions on the land and animals and the community are too high risk to take so lightly and without supportive facts and information. I grew up in the community of Northway and live close by in Tok. My Northway family uses that area very regularly and in all seasons. Northway has no economic base, the jobs are primarily state and federal based. These jobs are directly impacted by the Alaska & US economy and some of these few positions are up for reduction and elimination (the post office position). These all impact how Northway residents make money or subsist off the land. I think there is too much uncertainty for the Northway community and their continued reliance on subsistence to add non community and non-Alaska residents into that particular area. It is irresponsible of the state. I would recommend that the state take this land sale out, there are far too many questions and risks at this time.

Comment 64 of 141 - submitted on 10/26/2014 at 02:21 AM:

I believe this is a horrible idea. I don't understand how this happening. There are so many other areas to do this with why so close to people who need this land especially for subsistence hunting. I am ATHABASCAN. And I disagree with this proposal. All areas are to close to tribal areas. Our tribes have already lost enough heritage they don't need or want to lose hunting as well. Hunting is a big part of tradition and if it is taken from us I know I won't tolerate it. I will make it public, I will go through the courts. Those who say nothing are just as bad as those who are unjust

SGT Thomas Duncan 91B/00G U.S Army Veteran of Iraq and Afghanistan.

Comment 65 of 141 - submitted on 10/26/2014 at 07:07 PM:

I grew up in Northway and don't believe the land sale is a good contribution to the state or community. This pertains to the land sales at Deadman Lake and Paradise Hill. I am 19 years old and have fished, hunted, picked berries and mushroom, and camped in these places. my family lives on a native allotment in the village of Northway. Most of these allotments are either sunken by land changes or are affected by military contamination. Paradise and deadman lake were also traditionally used and there are many of my family members who have allotments next to the areas you all want to sell. They picked these traditionally used lands in the 70s. It is the last of our main hunting areas that remain free from contamination and sunken land. Also- these areas are both maxed out on use. We have a major influx of urban hunters! It would destroy our moose population and caribou hunting and how this village survives. Our village is concerned that the dept of natural resources didn't study the biology of what this would do to the caribou herds and moose. What about the ducks? I choose to live the Athabascan culture and will teach

both of my sons too. Our community survives on our subsistence. Please consider a large community and the many years and generations who would be impacted by this. and please consider the biology of an ecosystem and a caribou herd before pleasing the requests of a limited few.

Comment 66 of 141 - submitted on 10/27/2014 at 12:00 AM:

RE: Opposing ETAP Land Sale at Northway

I would like to request that the Resource Assessment & Development team remove the Northway land sale from the ETAP. I am an elder in the village of Northway and raised my children, grandchildren and now my great grandchildren in the community. I have seen many changes to the community, good and bad. There are new standards for how people live their lives, ways to do things, new technologies, new ways that our community and country is managed, and the list goes on. But the one thing that remains constant is that the people of Northway can always survive with their gathering, crafting, fishing, and hunting. Although the world has changed, our community still lives off of the land. Northway grows and shrinks in each year but Northway has been here for a long time and will always be here. Most of my family still lives in Northway today and our native allotments are in the Northway area too.

The prices for food and gas in our community is very high. Traveling to other locations like Fairbanks or Whitehorse to get goods and supplies is even more expensive. So we have to fish, pick berries, pick roots, cut firewood, moose hunt, caribou hunt, trap, and haul water in everyday life. Northway uses the Deadman and Paradise lands a lot for all of these activities. Like a lot of other people in Northway, some of my grand kids lived near these areas and hunted here all their lives. Selling these spots will hurt our community by making us compete with outsiders who come here for just for the fun of it. It is not a matter of survival for them. I don't think this is something the state wants to be responsible for.

Thank you

Comment 67 of 141 - submitted on 10/27/2014 at 12:00 AM:

The Delta Fish and Game Advisory Committee met on October 15, 2014 and voted 10 yeas, 0 Nays, 1 Abstention to submit the following comments on the designation of the Craig Lake Settlement land (specifically Section 6 of Township 14 South, Range 16 East, Fairbanks Meridian, Alaska) as currently proposed in the Eastern Tanana Area Plan.

Section 6 surrounds Craig Lake. It is designated as "Recreation" land in the current land management plan. People utilize this section of land to hunt, fish, trap, hike and other recreational activities all of which meet the definition of recreation in your plan. Craig Lake has been stocked regularly by the Alaska Department of Fish and Game (ADFG) since 1960 and is a popular destination for anglers, as well as other outdoor recreationists. ADFG has a tent platform, outhouse and row-boat provided there for public recreational use. Refer to the following web site for additional information:

<http://www.adfg.alaska.gov/index.cfm?adfg=fishingSport.lakeDetail&LakeID=1046>
Craig Lake is also listed in the "Milepost" and elsewhere (ADFG publications) to inform the public of recreational opportunities.

The proposed land management plan designates the Craig Lake area as Settlement

land (D-56 area on map 3-3) which purports to be 6,184 acres of which roughly 480 acres has already been transferred to private ownership. The preservation of Section 6 in its current designation as "Recreation" status should not materially affect the overall intent of the settlement expansion. Maintaining the designation of section 6 (surrounding Craig Lake) as Recreation land will preserve the public's opportunities to continue to utilize the lake for fishing and other recreational activities as it has always been.

Removing section 6 from the proposed designation of Settlement land and maintaining its designation as Recreation will also preserve the public's access to Craig Lake. In 2005 the DNR disposed of Tracts I and J in the original Plat as new Lots 1 and 2 within the existing subdivision created in the early 80s. The legal access "corridor" to Craig Lake, through the subdivision, was now reduced to a width of 25 feet. At the time ADFG unsuccessfully recommended to DNR that excluding Tracts I and/or J from the disposal would avoid potential public access issues to Craig Lake. The new 25 foot access corridor, designated by DNR, has several very steep sections that are limited for the increased use the new settlement would create. The fragile sections of the corridor would not support the increased use of the public freighting building materials and sustained year-round access into the settlement area, in addition to the recreational use. We suspect that this corridor would soon be rutted out and destroyed with no other option for public access, other than negotiations for transit along private lands on each side of the narrow 25 foot surveyed corridor.

The Delta AC references the following information from the DNR proposed land plan to substantiate their position:

CHAPTER 2:

Goals: (page 1): The following goals are for state lands in the planning area. Goals are general conditions that DNR attempts to achieve through management actions. ----- No single goal has a priority over the others.

Recreation.: (page 2): Protect recreational resources including public access and visual resources, and manage recreational activities to minimize user conflict, while providing for a range of recreational experiences on state land managed for multiple uses.

General Guidelines: (page 4)

B. In considering authorizations for use of state land, DNR will adjudicate applications to: 1. Avoid, or if not possible, minimize damage to streambeds, fish and wildlife habitat, vegetation, trails, anchorages, and other resources; 2. Minimize conflicts between resources and uses; and 3. Protect the long-term value of the resource, public safety, and the environment.

Fish and Wildlife Habitat: (page 13)

Ensure Access to Public Lands and Waters. Ensure access to public lands and waters and promote or enhance the responsible public use and enjoyment of fish and wildlife resources.

Public Access: (page 34)

1) Preserve, enhance, or provide adequate access to public and private lands and resources. Provide for future trail and access needs, and protect or establish trail corridors to ensure continued public access consistent with responsible wildlife and fish habitat conservation.

2) Ensure adequate opportunities for the public's use of public resources of local, regional, and statewide significance. 3) Provide access to and within developing areas within the region, including bridge crossings of major rivers, consistent with federal/state design and environmental requirements.

Recreation and Scenic Resources: (page 39)

Recreation Opportunities

Lands will be provided for accessible outdoor recreational opportunities with well-designed and conveniently located recreational facilities. In addition, undeveloped lands should be provided for recreation pursuits that do not require developed facilities. These opportunities shall be realized by:

- providing recreation opportunities on state land and water that serves multiple purposes such as habitat protection, timber management, and mineral resource extraction;
- assisting communities through cooperative planning, conveyance of state lands, and grants-in-aid for parks and trails within population centers;
- encouraging commercial development of recreational facilities and services through concession contracts, land sales, leases, and permits where public recreation needs can most effectively be provided by private enterprise, while minimizing environmental impacts and conflicts with the existing users of an area;
- protection of recreation resources including public access, visual resources, fish and wildlife important for recreation, and, where appropriate, the isolation and unique wilderness characteristics of the planning area;
- management of recreation to minimize user conflict, provide for a quality experience for all user groups, and protect the natural values and attributes of the area within which the recreation occurs; and,
- protection of ecosystems and habitat from damage caused by inappropriate recreation use

Shorelands and Stream Corridors: (page 51)

Management Guidelines (page 53)

G. Lakeshore Public Access. A portion of the lakefront on lakes greater than 10 acres that have or may be expected to have public recreation and all inlets and outlets of lakes of this size and capable of sustaining year-round natural or stocked game fish species shall remain in public ownership for habitat protection and public recreation. Adequate public access to these lakes shall also remain in public ownership or is to be provided through section line, 'to-and-along' easements or other types of public access easements. The amount of public ownership may vary on a site specific basis, but, at a minimum, some portion of these lakes shall remain

public. The size of the public reservation shall be appropriate to its expected long range recreational use and relative to the size of the lake. A width of 150' or more measured from OHW is to be retained or protected through an easement along inlet and outlet streams. Public use sites, created through the land disposal program, on lakes of 10-20 acres shall have at least 4 contiguous acres reserved for public access. For lakes larger than 20 acres a public use site of at least 6 acres shall be provided.

CHAPTER 4:

State Land Classification: (page 2)

11 AAC 55.160. Public Recreation Land. Land classified public recreation is land that is suitable for recreation uses, waysides, parks, campsites, scenic overlooks, hunting, fishing or boating access sites, trail corridors, or greenbelts along bodies of water or roadways.

Conclusion:

In reviewing the goals, objectives, management strategies and definitions above, the Delta AC sees essentially no conflict between DNR's objective to offer Settlement land in the vicinity of Craig Lake and the retention of section 6 (surrounding Craig Lake) as Recreation Land. Retaining section 6 as recreation land would actually bolster DNR's position on overall management of all land in the immediate vicinity of Craig Lake.

Should DNR have any questions regarding our comments, please contact us.

Sincerely

Addendum:

We would also like to express our disappointment with the quality of the maps provided in the proposed plan they contain essentially no detail and are impossible to read with any degree of accuracy

Comment 68 of 141 - submitted on 10/27/2014 at 12:00 AM:

I am writing in regards to your proposed land sale near Deadman Lake and Paradise Hill.

I have lived in Northway since 1964. For 50 years I have been using these areas and trails. I trapped and hunted. We still use them every year to get to camp. Many people in Northway use these areas and trails. Their ancestors used them for hundreds of years.

My children are a part of Northway Village. They all live in this area. I want my children & grandchildren to be able to use these areas and trails as we have been using them.

Why are you selling these particular areas? It seems to me that someone wants to own these already-made traditional trails, control them and restrict their use. If someone wants remote land, along the Taylor Highway would be a good place. There would be no village close by.

I am very opposed to land sales in these two areas.

I am requesting a public meeting in Northway re this sale, adequately publicized.

Comment 69 of 141 - submitted on 10/27/2014 at 12:00 AM:

I am greatly against your proposed land sale at Deadman Lake and Paradise Hill. My husband & I have used these areas and trails for years and we still use them every year. We are Senior Citizens now and cannot make other trails and new camps for hunting & other subsistence uses.

Out of all the land available, who picked these established trails that have been used by the people of this area for years - even before Alaska became a state?

Comment 70 of 141 - submitted on 10/27/2014 at 10:14 AM:

I oppose including the land sales near Northway because they are primary traditional hunting and subsistence use areas for the people of Northway. The land sale actually would limit how a great amount of Northway residents moose hunt. Each family has an established spot they hunt. There has been a massive amount of hunters from outside of our villages who aren't even associated with the villages from places like Fairbanks and Anchorage who are showing up in and near Northway and have pushed out a lot of subsistence users already. These are hunters who can afford to drive a very long distance who are over hunting areas and can afford the best hunting equipment and ATVs where people don't even have jobs and rely on subsistence. There would be a substantial impact to the fish and game which is integral to supporting the Northway people. I think that this could cause far too many problems to include in a long term plan.

Comment 71 of 141 - submitted on 10/27/2014 at 11:29 AM:

I would like to submit a comment stating that I do not agree with the land sales in Northway. The Paradise Hill land sale surrounds my family's native allotment. Our family has used the area traditionally and this is why the allotment was chosen in this area. They knew that this was an area that had a lot of resources and wanted to be able to keep this spot for generations to come. This is a major hunting area for my family and the entire village. If the state decides to sell land surrounding our allotment which is regularly used by the the community of Northway, it would create a major issue. Northway lives on hunting and fishing. There would be way too many people here if the land is sold and it would benefit no one. I would like to see additional reports to show how the state made this designation and how it affects the moose and caribou.

Comment 72 of 141 - submitted on 10/27/2014 at 02:28 PM:

I would like to submit a comment requesting that the Dept. of Natural Resources remove the land sale near and in Northway which is proposed in the Eastern Tanana Area Plan. I was born and raised in the community of Northway and live nearby in the community of Tok. Although, I continue to use my traditional hunting grounds in Northway by introducing my children to the same area used by both my late parents and late grandparents. My late parents' family has a long history in Northway. I am also a Board of Director for Northway Natives, Inc. which is the Native village Corporation representing its shareholders. I've lived most of my years near the proposed land sale sights. There are reasons why I oppose this: Reason 1 - the areas, Deadman Lake and Paradise, have been used for decades by our Northway people and selling the land means they would only be competing for traditional hunting areas. This benefits a very small amount of people overall. This Plan will

only increase the stress of hunting areas that Northway residents rely on for subsistence. This plan will offer land to NON-residents who are unfamiliar with the area and local people that utilize the surrounding areas. The Northway people relies on this area year around. For those NON-residents of the area, the benefits are very small to buy land and build cabins. This puts more stress on the local community of Northway, its people and State of Alaska. Reason 2 - if a land sale happens, it pushes Northway people out around the land sale area to hunt and further increases the number of moose & caribou killed in a larger area and would hurt the moose and caribou population. Reason 3 - there will be an additional large amount of hunters that will come to the area and further impact our moose and caribou numbers. This won't stop, once the state opens a land sale, an onslaught of hunters hoping to get away from Urban areas will discover our caribou and other fish, over trap, and over hunt and it will be inevitably over used and Northway people will lose their primary resource. As a leader in this community, who makes decisions every day on how to best serve and assist people, I can tell you with certainty that this is not a good idea for Northway or the state.

Comment 73 of 141 - submitted on 10/27/2014 at 02:58 PM:

I highly disagree with the selling of the land! Us locals use that land for hunting, fishing, and access to hunting grounds. The Northway Village Council also uses that land for Activities... Don't sell the land!!!!

Comment 74 of 141 - submitted on 10/27/2014 at 03:10 PM:

I grew up in Northway and don't believe the land sale is a good contribution to the state or community. This pertains to the land sales at Deadman Lake and Paradise Hill. I have fished, hunted, picked berries and mushrooms, got firewood, and camped in these places. my family lives on a native allotment in the village of Northway. Most of these allotments are either sunken by land changes or are affected by military contamination. There are now signs posted in areas we used traditionally stating that the sites are now contaminated. Paradise and deadman lake were also traditionally used and there are many of my family members who have allotments next to the areas you all want to sell. They picked these traditionally used lands in the 70s, long before you thought about your requests from people who aren't even from the community. It is the last of our main hunting areas that remain free from contamination and sunken land. Also- these areas are both maxed out on use. We have a major influx of urban hunters! It would destroy our moose population and caribou hunting and how this village survives. Our village is concerned that the dept of natural resources didn't study the biology of what this would do to the caribou herds and moose. What about the ducks? There aren't as many Ducks coming through here either. I choose to live the Athabascan culture and will teach my family . Our community survives on our subsistence. Please consider a large community and the many years and generations who would be impacted by this. and please consider the biology of an ecosystem and a caribou herd before pleasing the requests of a limited few."

Comment 75 of 141 - submitted on 10/27/2014 at 03:42 PM:

I grew up in Northway and don't believe the land sale is a good contribution to the state or community. This pertains to the land sales at Deadman Lake and Paradise Hill. I have fished, hunted, picked berries and mushrooms, got firewood, and camped in these places. my family lives on a native allotment in the village of Northway. Most of these allotments are either sunken by land changes or are

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Comment 76 of 141 - submitted on 10/27/2014 at 03:43 PM:

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Comment 77 of 141 - submitted on 10/27/2014 at 03:47 PM:

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Comment 79 of 141 - submitted on 10/27/2014 at 03:51 PM:

I grew up in Northway and don't believe the land sale is a good contribution to the state or community. This pertains to the land sales at Deadman Lake and Paradise Hill. I have fished, hunted, picked berries and mushrooms, got firewood, and camped in these places. my family lives on a native allotment in the village of Northway. Most of these allotments are either sunken by land changes or are affected by military contamination. There are now signs posted in areas we used traditionally stating that the sites are now contaminated. Paradise and deadman lake were also traditionally used and there are many of my family members who have allotments next to the areas you all want to sell. They picked these traditionally used lands in the 70s, long before you thought about your requests from people who aren't even from the community. It is the last of our main hunting areas that remain free from contamination and sunken land. Also- these areas are both maxed out on use. We have a major influx of urban hunters! It would destroy our moose population and caribou hunting and how this village survives. Our village is concerned that the dept of natural resources didn't study the biology of what this

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Comment 80 of 141 - submitted on 10/27/2014 at 03:54 PM:

I grew up in Northway and don't believe the land sale is a good contribution to the state or community. This pertains to the land sales at Deadman Lake and Paradise Hill. I have fished, hunted, picked berries and mushrooms, got firewood, and camped in these places. my family lives on a native allotment in the village of Northway. Most of these allotments are either sunken by land changes or are affected by military contamination. There are now signs posted in areas we used traditionally stating that the sites are now contaminated. Paradise and deadman lake were also traditionally used and there are many of my family members who have allotments next to the areas you all want to sell. They picked these traditionally used lands in the 70s, long before you thought about your requests from people who aren't even from the community. It is the last of our main hunting areas that remain free from contamination and sunken land. Also- these areas are both maxed out on use. We have a major influx of urban hunters! It would destroy our moose population and caribou hunting and how this village survives. Our village is concerned that the dept of natural resources didn't study the biology of what this would do to the caribou herds and moose. What about the ducks? There aren't as many Ducks coming through here either. I choose to live the Athabaskan culture and will teach my family . Our community survives on our subsistence. Please consider a large community and the many years and generations who would be impacted by this. and please consider the biology of an ecosystem and a caribou herd before pleasing the requests of a limited few."

Comment 81 of 141 - submitted on 10/27/2014 at 03:56 PM:

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herd before pleasing the requests of a limited few."

Comment 82 of 141 - submitted on 10/28/2014 at 10:51 AM:

I strongly object to the sales or any other improvements to the Deadman Lake area and Paradise area. The reason is listed below. I was born and raised in Northway. My late Aunt Della Northway has a native allotment at Paradise and this map surrounds her native allotment. I have camped and hunted this area with the family for many years. We have a lot of outside hunters who use this area and have no respect for her land. There is one other NA in this area. These areas are used as traditional hunting grounds for our people. We are already competing with outside hunters who can afford equipment to take them out. We still pack and if lucky, have a family member who has a 4 wheeler to help out. To do this will only hurt the local people and will bring no economy to our small community. An arrow head was found near Deadman lake that was estimated to be 1500 years old by Norm Easton, Anthropology. This to me proves that these areas are and will be used by the local people. Bringing in more outsiders just for recreation will hurt us more.

Comment 83 of 141 - submitted on 10/28/2014 at 11:05 AM:

My family is from the village of Northway and I currently live in Fairbanks. I visit the community often and keep in touch with our relatives in the fairbanks area. I know that this community still depends on hunting and fishing. I have several family members whose native allotments are near the area. That community is extremely related to the land. The most employment that the community experiences is temporary seasonal summer employment like firefighting. It isn't necessarily a career that provides retirement and benefits in the village like it does in more urban areas. The dept of natural resources should consider that Northway will need the land to survive on for at least the next 15-20 years which is what I understand the length of the eastern Tanana area plan to be. They have also been subject to many outsiders showing up in these areas already and it is difficult for the village to handle. I would recommend removing the land sales near Northway that threaten their fishing and hunting abilities.

Comment 84 of 141 - submitted on 10/28/2014 at 01:17 PM:

I don't think the state should sell land in Northway. This area experiences a lot of hunting and trapping use and it would provide little benefit to a very small amount of people. We have saw how much non-Northway residents have impacted the area already. It is very sad and has hurt our village and community. There were four wheelers everywhere (non-Northway people) last year in these areas you want to sell and you could hear the four wheelers constantly during hunting season. It is about the only place left for us to hunt and it is almost ruined now. Selling land would attract even more hunters who have the money to travel long distances and drive out to our Northway community. Our Northway people don't have a lot and are subsistent on the land. It really drives our people out of the last of our good hunting areas. If this was something that provided jobs or benefited the community, our village would likely have a different opinion.

Comment 85 of 141 - submitted on 10/28/2014 at 01:49 PM:

I am a Northway resident and oppose the land sales in the ETAP in our area. Our village uses hunting and trapping for survival and there are just too many people on the lands you want to sell now. It would be just crazy to add more people who aren't from the community that would hunt the animals out and leave us with nothing in

the next years or later years.

Comment 86 of 141 - submitted on 10/28/2014 at 02:03 PM:

I think the Department of Natural Resources should remove the land sales near Northway from the Eastern Tanana Area Plan. My grandma's native allotment is surrounded by one of these land sales at Paradise Hill. Our family was raised in this area and it is the last and best of Northway's traditional use areas.

Right now these lands are being destroyed by people who aren't even related to the community of Northway or live even within our region. These are people coming a very long ways to be in our best hunting land. I hope the DNR knows that Northway is a community that doesn't have much jobs and never has. I hope the DNR knows that selling these lands would just add even more abuse by non-community/non-resident users on the land and moose, caribou until nothing is left. Then where will the Northway people go who really survive on this area?

I don't agree with this and I STRONGLY oppose the DNR selling land near Northway.

Comment 87 of 141 - submitted on 10/28/2014 at 02:35 PM:

I don't believe the Northway area should be subjected to a land sale at this time. We understand the land sale is directed to recreational users which will probably be hunting. I'm a descendant of the Northway community and I fully understand our Northway community's dependence on subsistence hunting, fishing, and trapping. This is a way of life as well as something that the community is reliant upon.

There is a substantial and important difference between a non-Northway resident (For example - Fairbanks & Anchorage) hunter's interest in the state lands near Northway for a good hunting prospect further away from populated areas and the actual dependence on these traditional use areas by the Northway people. There are far too many people who have no connections to real subsistence or the community aggressively using these areas now. It is a tough situation and hurts the community's ability to have successful hunts as it is. Selling state land here is destructive to the land and the community as well as the moose and caribou.

Comment 88 of 141 - submitted on 10/28/2014 at 02:54 PM:

The land sale in Northway should be removed from the Eastern Tanana Area Plan. The entire community uses those areas. My parents have trapped the proposed Paradise land sale area for at least 30 years. The community uses these areas mostly for hunting. It serves a lot of other purposes for the native and non-native communities. Northway is a hunting and trapping community. I think offering a land sale for recreational reasons would draw the attention of a lot of hunters and trappers not from this area as it does now. So drawing in many non-resident and non-community hunters and trappers into the focal area for this hunting and trapping community just isn't a sound plan or use of the land. It would really hurt a lot of families. There would be more people hurt by this potential land sale than would benefit.

Comment 89 of 141 - submitted on 10/28/2014 at 05:55 PM:

I don't agree with the Department of Natural Resources including land sales in Northway. I think it should be removed. I am from the community of Northway and have a lot of family who have used and still use these areas for traditional and cultural use like hunting. I also use these lands, this is where my family also hunts and where my children are learning to hunt.

The community, like most rural communities, has to largely supplement their life with fishing and hunting. There will be some in rural communities that don't have jobs but receive state or federal assistance which covers some things but not much. These are places where gas prices and food prices easily double or triple from those in regular large towns. Let's not even add shipping or mailing costs into that equation, which is a massive and necessary cost because it is hard for rural people to purchase well functioning cars and maintain them without employment, which again is minimal in the first place.

Traditional and cultural use was a way of life for hundreds of years and even longer in the communities of our region - Northway, Tetlin, Mentasta, Dot Lake, and Tanacross. The state of Alaska is only 55 years old so you can imagine that while life has changed, the roots are very strong in our Athabascan culture. There are some who choose to leave our villages and pursue education to assist our villages and there are some who continue living in our rural villages; most stay because they were raised in the Athabascan culture and it is a way of life. I also believe that our people are still in a state of transition between cultures. While we would like our youth to pursue education and help our village, sometime it is hard for them to step into the western world when they were raised in a very different culture.

With that being said, you can see that there is a mix of people who remain in our villages for different reasons but what they all absolutely have in common is dependence on the land. Our community understands that the ETAP is about 15 years in length. The damage that can be done to this community by distributing the top traditional use areas in the next fifteen years to non-community and non-residents would be far reaching and very deep. It would definitely impact how people are supporting themselves. I think there would be a lot of fall out for the state of Alaska that the DNR is underestimating. The DNR is setting up a lot of people and organizations for failure if they sold this land. The negative outcomes out weigh the positive ones by 100%.

Comment 90 of 141 - submitted on 10/28/2014 at 06:14 PM:

I think the state should remove the land sale in the community of Northway where I grew up because: 1) there is way too many people in these areas now; there are a lot of local Northway people and more and more non-locals showing up in the area too, 2) This is traditionally a major hunting area for the village of Northway (for a very long time), it has a deep connection to the Northway community and it is one of the last areas they can really subsist on, 3) Northway has very few ways to make money unless you are a teacher or state trooper and these aren't jobs normally held by local or long term Northway people so they very much rely on cultural use like fishing and hunting and a land sale would really hurt that aspect of their community, 4) This provides little benefit to the state overall. The number of people who might have a good hunt or experience means that people in our village didn't eat and don't have many other options to fulfill that need.

Comment 91 of 141 - submitted on 10/29/2014 at 11:07 AM:

I oppose the incorporation of a leasehold area and potentially a land sale in Northway at Deadman and Paradise as part of the ETAP.

I have lived in Northway for 24 years and will raise my five children in this community. My family, as do most of Northway residents, relies on hunting and fishing to either fully or support or supplement our lives in this community. Our

community survived and lived in this proposed leasing/land sale location long before the Alcan highway was built next to it. Opening up land use options like leaseholds or land sales to non-community members and non-residents near and on main traditional hunting areas where the community is mostly subsistence based will hurt the community immediately. It is not ethical or appropriate.

Comment 92 of 141 - submitted on 10/29/2014 at 11:59 AM:

The state should remove the leasehold or land sale in the Northway area at Deadman Lake and Paradise Hill. There are too many local people already utilizing all of the areas encompassed in the two proposed land use designation areas. Deadman Lake & Paradise were and are traditional hunting areas for the Northway people including a majority of my family. Our community, village and my family depends on hunting in our lives. This plan to let non-community members and non-residents engage in land use here doesn't provide much benefit to the people who could get a land lease or buy land because its being well used by locals already as it has for a 100 or more years and that would create much conflict as their designated area is already in use. There is no benefit for the community and the village of Northway which is located next to these areas. It would affects a great number of the current user's hunting and trapping patterns.

Comment 93 of 141 - submitted on 11/01/2014 at 01:49 PM:

I oppose the land leasing or sale in Northway at Deadman and Paradise. Allowing non-locals to come in and hunt here would greatly affect our traditional hunting patterns. The Northway village and community has used this area for a very long time, years and years. This means local people who are native and non-native. It is used in many ways: hunting, trapping, a place to harvest birch and mushrooms and berries, community activities, and a meeting place among many other things. It is not efficient or practical to lease/sell remote cabin lots and recreational use lots to non-Northway community members or non-Alaska residents when the community depends on the two areas quite heavily. The outcome of the state doing this is just not going to be a good one for the Northway people. Northway is pretty subsistent and these land areas are part of every day life there. Everyone in Northway is connected to these areas whether it be they used to hunt this area or hunt it now. So the DNR would be ignoring the current use by allocating these areas to other people who have requested it obviously not from our community.

Our community is concerned what this land use plan would do to our moose and how the state proposes to manage that aspect of it. That is one of the most important parts of this whole situation! The DNR needs thorough analysis on biological impacts and management and that is not included in the proposal.

Comment 94 of 141 - submitted on 11/01/2014 at 01:55 PM:

I don't feel that th DNR should include leasing or selling lots so close to the Northway community. I am a descendant from the community and spent mY youth in Northway. Most of my family lives in the area and Use hunting, fishing and gathering as an everyday part of life.

The community would not benefit from any recreational subdivision lots or remote cabin lots. This would serve a very small amount of people and over extend the Northway people's resources they depend on in this area. It would actually harm more people than help. I would think that the Northway community and its larger

population (who are also state residents) than of the potential population of users of proposed recreational and cabin lots would have precedence in this situation. Especially because this is not a recreational experience for this community, it is how they survive.

Comment 95 of 141 - submitted on 11/03/2014 at 12:00 AM:

Thank you for the opportunity to provide comments on the Public Review Draft (PRD) of the Eastern Tanana Area Plan (ETAP).

Pure Nickel Inc. is a mineral exploration company and through its US subsidiary has a 100% interest in the MAN Alaska Property. Pure Nickel provided comments during the 2009 public scoping period, at that time the land that comprises the MAN Alaska Property was mostly located in the Alaska Range East Region of the ETAP.

The 2014 PRD states "that part of the 1985 region south of T018S has been dropped from the ETAP plan boundary . . . this area includes the Tangle Lakes which are rich in cultural history and archaeological features and generally include the Amphitheatre Mountains. (page 3-139)" The PRD also notes that "the area is functionally similar to other state lands in the area of the Denali Highway (page 1-3)." By removing this land from the ETAP, the MAN Alaska Property has also been removed.

We have two comments. First, by dropping the area out of ETAP before it is included in another plan, it becomes an area without a plan. Due to the legal requirement that a plan must precede a disposal of state interest, this legal no-plans-land means that the department cannot authorize a disposal of interest in the area without the long and somewhat complicated planning process. This action would disable the Department from considering a right-of-way, gravel sale, permanent trail improvement (i.e., easements), etc. Should budget issues or other unforeseen problems prevent a land-use plan for the area, the action would prohibit some recreational development, mining, or other improvements in the area. Creating this impediment is unnecessary and inappropriate.

Our second comment is that the MAN Property is very different from the lands in the area of the Denali Highway. Because of access difficulties, lands north of the Amphitheatre Range experience infrequent public use. The area to the south sees frequent use. North of the range is comprised of glacial creeks and little to no fishing value. South of the range has clear-water streams and important fishing values. The Tangle Lakes Archaeological District (TLAD) includes the area south of the range but stop at the township lines near the divide.

The MAN property is north of the Amphitheatre Mountains. It is approximately 17 kilometres from the highway and separated by the Amphitheatre Range. The Property is highly prospective for a polymetallic discovery that could eventually be developed into a mine. It should, as it has in the past, be considered separate from the protected Tangle Lakes Archaeological District (TLAD), and from the more frequently used public recreation area to the south. The Company has invested over \$25 million in exploration and would like the land, which has been classified since 1985 as active use, remain active use, so that it can be accessed for mineral exploration and eventual mine development. We believe that the plan update is an opportunity to separate the management unit at the Amphitheatre Mountains, and

include the differences between the two areas in the resource description and management intent.

It is definitely inappropriate to delete the area from all plans, even temporarily, and the language of the current ETAP draft implies that the two areas have similar values. That is in error and should be changed.

Thank you for the opportunity to comment.

Yours truly

Comment 96 of 141 - submitted on 11/03/2014 at 12:00 AM:

Attached is copy of Resolution 2014-22 passed by the Northway Village council opposing Eastern Tanana Area Plan proposed Sale of Deadman Lake and Paradise properties, This would negatively impact the subsistence and traditional hunting that the community of Northway relies on. We hope you and the state give serious consideration to our opposition. Thank you.

Sincerely

Resolution 2014-22

A Resolution Opposing Eastern Tanana Area Plan

WHEREAS: The Northway Village Council is fully authorized to act on behalf of our members in matters arising under the Indian Self Determination Act of 1975, P.L.93-638, as Amended, 25 USC 450 ET. Seq: and

WHEREAS: The governing body of the Northway Village Council is made up of (7) members empowered to act for and on behalf of its tribal members in adopting resolutions, and

WHEREAS: the Council is concerned about the Health, safety and welfare of its families and children, and

WHEREAS: the health, safety and wellbeing of our men, women and children assures our Survival as a tribe and as a people, and

WHEREAS: Northway residents have always relied on subsistence and traditional use of the land, as they will into the future.

THEREFORE BE IT RESOLVED; that the Northway Village Council opposes the State of Alaska Department of Natural Resources proposed land sale of Deadman Lake, and Paradise properties in the Eastern Tanana Area Plan because it would directly, negatively impact the subsistence and traditional hunting the Northway community relies on.

Certification

We hereby certify that this resolution was passed by the Northway Village Council on October 14, 2014.

Comment 97 of 141 - submitted on 11/03/2014 at 12:48 PM:

I request that the state eliminate the proposed leasing and/or land sale in Northway at deadman and paradise. These areas are traditionally used by the village. This use

extends back many generations and is something the village continues to depend on. Our village will depend on using this land in the next decade or two. Leasing this area out to people not from Northway or who are non-Alaska residents who will build camps and cabins and directly affect Northways caribou and moose hunting. The state needs to consider the current and long lasting impact to the rural population of Northway.

Comment 98 of 141 - submitted on 11/03/2014 at 01:13 PM:

I disagree with the DNR's plan to offer leases near Northway. This is not a good idea. Northway has few jobs. Most people work seasonal employment in the summer like brush cutting or fire fighting. And some work slope jobs which takes them far from family and the community. Those in our family who remain in the village have to continue to fish and hunt to support our families even if one member of the family has income. It usually cannot support an entire family due to high energy & food prices. It is stunning that the state would offer these areas without fully engaging our villages in the original stages of planning. Or without studying and discussing with our villages what the impacts are.

Our villages on the road system are often subject to added use in addition to the community's consistent use because people drive out from urban areas and want to find less crowded spots to try and moose hunt. Their reasons to moose hunt are far different than our reasons to moose hunt.

My family has a native allotment which would be directly affected by the land leases. It isn't okay for the DNR to offer this opportunity to recreational users not from our community without understanding what this does to the Northway community and surrounding villages too! We are also state residents. We should be included in the initial conversation, maybe there are other areas that would fit this purpose or other things we think would benefit our communities AND the state to include in your plan.

This proposed land leasing doesn't fit the needs of our area or offer much in the way of benefits.

Comment 99 of 141 - submitted on 11/03/2014 at 02:16 PM:

I do not agree with the proposed land leasing or sale near my village of Northway because these two areas, Deadman Lake and Paradise, are important to the Northway community. They are places we depend on to hunt and pick berries. If the DNR wants to add people to our area to satisfy their requests for lands in this area, then the DNR also needs to listen to our community and understand what kind of impact leasing or selling land to non-community people will have on us. Do they have precedence over us? My family hunts here. I am caring for a new son and use subsistence and traditional and cultural use to care for my family. We don't have various job options here. My family has a native allotment within the proposed leasing/sale area. This will affect every person in our community.

Comment 100 of 141 - submitted on 11/03/2014 at 04:19 PM:

I oppose the section in the Eastern Tanana Area Plan that includes leasing land at Northway on Dead Man Lake and Paradise Hill. These areas are currently well used by the community of Northway and have a long history with our native people. I have hunted here with Northway friends and family for all of my life. Northway depends on this land because the village and community can't currently hunt too

many other places due to contamination and a lot of changed geography (water related as in flooding, etc.). Our community always used this area and now relies on it more than ever. I feel that this area is important to the survival of the Northway community. This includes the current community who are the leaders and providers as well as the youth my age who were raised traditionally and are starting their own families.

Comment 101 of 141 - submitted on 11/05/2014 at 12:00 AM:

We respectfully request that you remove the leasehold/potential land sale areas in the Northway area from the Eastern Tanana Area Plan.

We are elders in the community of Northway. We are the last of the people in our village that were here before Alaska was a state. Our family was here in the Northway area for years and generations. We grew up here and moved regularly around this area to our seasonal camps. We had fish camps and moose camps and places we picked berries and got caribou. We have places we like to get birch bark for baskets at. We have places that we trapped animals at like beaver, lynx, and martin, to make clothing. We have places we find the perfect wood for in tanning our hides. We have spots to get grouse and ducks.

And we use these places today. Our kids use them, our grandkids use them, and our great grandkids use them. Our extended family uses them. Our community uses them.

Our family chose a native allotment in the land claims period which was required from the passing of the Alaska Native Claims Settlement Act in 1971. This native allotment is surrounded by the Department of Natural Resources' proposed land sale in the Eastern Tanana Area Plan. This is one of the last areas that still can offer what it used to when it was first chosen. Many areas in the Northway community have changed due to the climate and many are also contaminated by the military. Paradise Hill was not only traditionally used by our family but several other Northway families. In our culture, our Athabascan people work together. We respect the animals that we take from the land and we share with our family and other community members. In our culture, our people have an understanding and connection with the land and animals. We know that we rely on these animals and cannot over hunt or over fish.

Currently, the state land in the proposed leasehold/land sale areas is being overrun by people who have no association with Northway, the surrounding villages, or subsistence. There are ATV trails growing in the areas and hunters driving in from Anchorage and Fairbanks combatting our local people who survive on moose and caribou in everyday life for hunting areas. Not only is it dangerous to have so many people in a small area but it is also hurting the entire community as well as our family. These hunters do not share what they hunt or care about over hunting, they are here to get what they need and leave. They do not have to deal with the after effects of their actions on an entire community and the land like we do.

The Northway community depends on their ability to use these areas. Northway is still a subsistence community. The leasing/land sale would bring in a lot of new people in addition to those who actually hold leases or buy land. To our knowledge, the impact on moose to our entire community as well as to our family across the border in Canada has not been examined. We also need to know the current statistics and the long term impact on the Forty Mile caribou herd. Without this

information, to our community and our family, offering leases or land sales in the two areas is too large of a risk to take.

We feel that the Department of Natural Resources should re-evaluate their intention in this area in addressing other Alaska residents/non-residents requests and must factor in the input of the current residents in the area. There are approximately 160-180 people residing in Northway. This is a significantly larger amount of people that the area serves than what we would assume the leasehold/land sales would serve. This dramatically affects our lives and well-being.

We do not support any leasing or permanent sale of the traditional lands in the Northway area at this time, including Deadman Lake and Paradise Hill sales.

Thank you

Comment 102 of 141 - submitted on 11/05/2014 at 02:07 PM:

There is a section of SEC 36 T1N R1E N1/2 NE1/4 NE1/4 that is designated as Wildlife Habitat. The corner has a dirt road/trail running through it and is bounded on two sides by residential neighborhoods. I request that you release the 20 acre corner portion and redesignate the parcel appropriately for land disposal.

Comment 103 of 141 - submitted on 11/06/2014 at 12:00 AM:

I am writing on behalf of the Board of Directors of Partners for Progress in Delta, Inc. to be on record regarding the proposed "Eastern Tanana Area Plan" currently out for public comment.

Partners for Progress in Delta, Inc., as I told you at the public hearing at the Delta Community Center, is affected directly by the proposed change in the designation of the land identified on page 91 of the plan. The item at the top of page 3-91, described as D-30, RSU 57L, F010S010E, is the area which we are addressing through this letter.

Specifically, we began the application process last year to purchase Tract B on North Clearwater Road as permitted under the current land designation. Because of delays regarding the acceptance by the Department of Education of the Delta/Greely School District relinquishment of Tract B, the process bogged down. Now we see that if the plan is adopted as written, we can no longer purchase the land. To keep the process moving, since we are seeking legislative support in the FY16 capital budget for additional funding to build our proposed stand-alone expansion facility, we have amended our application to continue with a request for a long-term lease of Tract B.

Nonetheless, we ask that the designation for at least this particular parcel (Tract B) not be changed, thereby allowing Partners for Progress in Delta, Inc. to consider purchase of the land at a later date.

Many thanks for your consideration of our request.

Sincerely

Comment 104 of 141 - submitted on 11/06/2014 at 06:19 AM:

I and my family oppose the Alaska Dept. of Natural Resources proposal to offer a land sale or leaseholds near Northway at Deadman Lake and Paradise Hill area. My

kids, neighbors, and community of Northway have hunted these areas for hundreds of years. I personally taught my children to subsist in these areas. We are already in dispute with a number of hunters that just started hunting the area and are very inconsiderate toward the local subsistence hunters that grew with this land. I could see the animosity and trouble this sale will cause between the locals and leases. I strictly oppose such a sale and will do anything to protect the area. The state needs to understand the impact this sale will have on the local subsistence users.

Sincerely,

Bernard Hildebrand

Comment 105 of 141 - submitted on 11/06/2014 at 09:55 AM:

Tanana Chiefs Conference responded to a request by Alaska Native villages in the Upper Tanana planning area and helped facilitate a meeting in Tanacross over the Eastern Tanana plan on October 31, 2014. The meeting included approximately 25 persons living in the community and the discussion focused on the land designations currently proposed in the Eastern Tanana draft plan. Local residents are concerned about demographic changes the plan poses to their community. They asked TCC for technical assistance to request the State planners to convene a meeting in Tanacross to explain the plan and obtain community comment prior to the November 14 comment deadline. The DNR team can contact me at the number provided (ext 3343) or call Tanacross Council 883-5024 and request assistance to set a date and time to gather concerned community members in a discussion over the proposed plan.

Comment 106 of 141 - submitted on 11/08/2014 at 09:55 AM:

Concerning proposed "land disposal, subunits" East of Deadman Lake, Gardner Creek, Paradise Hill and Sweet Water trail areas. I strongly disapprove of the development of these areas. My family and friends have been subsistence hunting, trapping and berry picking there since we were able to do so. We depend on these areas to feed our families through the long hard Alaskan winters. We are extremely concerned that we might be blocked, or have added competition, by new land owners that don't fully understand the importance of these areas and or trails to the survival of the local people. We have the lowest moose population in the state and do not want or need the added pressure on our "already stressed" resources. It's hard enough to fill our freezers as it is. These trail heads are very important to our survival and some have been active trap lines since the mid '70's. Please reconsider these areas.

Comment 107 of 141 - submitted on 11/10/2014 at 12:00 AM:

INTRODUCTORY COMMENTS

Young's Timber, Inc. (YTI) is a family concern and along with its sister company, Young's Fuel Logs and Pellets LLC (YFLP) utilizes the fiber resource found in the Upper Tanana Region of the Eastern Tanana Basin Area Plan. Thus, the ETAP is of concern to both organizations. YTI business effort includes timber harvesting and transportation as well as the manufacture of house logs and cabins, sawmilling, and firewood; YTI's market includes interior and southcentral Alaska and occasionally the Yukon Territory. YFLP business plans are to manufacture and market throughout Alaska and the western one-half of the Yukon Territory 8 pound fuel logs and wood pellets (both require clean chips, i.e. no bark). YTI will be the primary supplier of fiber for YFLP fuel logs and pellets. Dirty chips, chips containing white wood, bark,

and branches but no foliage will be used to heat the driers and buildings. Plans are for YFLP to be operational in 2015. Future plans include a gasifier unit which will be used to produce electrical power for YTI and YTLP and for sale into the grid; this is currently being investigated. YTI and YFLP plan to be in operation for numerous generations.

Currently, YTI employs 5 to 13 people on a seasonal basis, weather permitting, and as demand warrants. YFLP will employ an estimated 15 to 30 people once fully operational and YTI will employ an additional 2 to 6 people to meet YFLP demand. YTI will most likely hire local individuals. YFLP plans to hire as many local people as possible and provide in-plant training in the Lower-48-this is already arranged.

YTI largely confines its comments to the Upper Tanana Region and the eastern Alaska Range East Region. YTI's working circle is within this Region as well the adjacent YBAP. YTI personnel and consultants provided information/comments at my request.

As stated in the cover letter. "This land is primarily located adjacent to the Tanana River and the surrounding uplands and the Fairbanks North Star Borough north of the Tanana River" is misleading. It excludes much land immediately south of the Tanana River and south of Delta as well as the Tangle Lakes and portions of the Chisana and Nabesna Rivers. What is meant by "Tanana River"? Is it the watershed/ecosystem or a hodge-podge of political entities/units. Modern classifications and planning are done on an ecosystem basis. The plan should be done on an ecosystem basis (not a future plan, but the current plan. Political units (Denali Borough, Fort Wainwright, National Park Service...) management should be identified and, where appropriate, what how they manage.

YTI recognizes the Upper Tanana River Basin as a separate ecosystem: this is supported by the literature as well as personal observations. The ecosystem includes the Johnson River watershed east and west of the Johnson River) which is west of the western boundary of ETAP (Dot Lake straight line). DoF recognizes Johnson River as boundary between Tok Area (east of river) and Delta Area (west of river); Hanson's 2013 forest inventory report suggests that average site index (measure of site quality) in the upper valley is 10-15 feet less than the more western units. - can you adjust or recommend adjusting the boundary to provide "consistency" and on an ecological basis?

YTI agrees: ETAP will provide up-to-date management direction for the state owned and selected lands in the area. These plans will not affect federal, borough, Mental Health Trust, University, Native, or other private lands. However, little direction is given except for generalities-which are adequate in some cases. YTI and YFLP strongly support the concept of multiple-use as does the Tanana Valley State Forest Management Plan. I recognize that for certain sites, all uses are not compatible-these are exceptions. Forested sites, identified as forestry, Habitat, and "general recreation" (trails, access), and transportation corridors should be managed on a multiple use basis, especially if common sense is applied.

YTI's review is limited by time constraints and is not as thorough as it could be. The document must be rewritten to eliminate unnecessary, redundancy (padding?), wordiness, error including numbers in tables. Organization (not format) but text within sections and paragraphs must be organized better. The use of the verb is and

was are overused as a helping word and commonly detracts from the clarity or impact of statement.

YTI's review contains input from at least 3 people with one not on YTI's staff. Lastly, I am not the best writer, but I am a careful reader.

GENERAL COMMENTS:

- CRITICAL CONCERN: RED FOX RESEARCH FOREST

See the attached report attached to my comment pages. Why has this effort not been recognized in past plans? It is almost as if DNR does not recognize the need for operational research-research that is essential to sustained yield. It was designed to address operational forest management concerns-absolutely essential for professional forest management. The Forest (plus or minus 6,000 acres) was proposed by Mr. Richard Malchow, Area Forester of DoF and initiated in 199/early 1991. Plantations (white spruce, black spruce, tamarack lodgepole pine) were established in 1992 to test species on the gravelly outwash soils, so common in the Upper Tanana River Basin Ecosystem, and spacing (distance between trees); they have been remeasured annually. Another discussed effort was an operational study to test various site preparation techniques (leave trees, roller chopper, disk, drag chain, widespread (no skid roads) disturbance by log skidders, and prescribed fire) to determine natural regeneration success and costs. This information is critical to YTI and other loggers and to the sustained yield mandate **FORMALLY RECOGNIZING AND DESIGNATING THE RED FOX RESEARCH FOREST IN THE ETAP PLAN IS A MUST.** Again, see the attached report for background information and details. Thank you.

- Document is difficult to read: it lacks: clarity, conciseness, coherence, and organization within sections or paragraphs; it contains errors or vagueness. It needs revision/rewriting and careful proof reading.

- Document is wordy and sometimes can be tightened up by simply saying Commissioner of DNR instead of Commissioner Department of Natural Resources to rewriting paragraphs to avoid redundancies-see p A-3 line 16: "The division director of the state division" and the "Most..." which is just verbiage-one of my consultants harps at me regularly about the KISS rule-"Keep short and sweet" or Keep it simple, stupid". I, as a member of the general public, want/expect a document that is easily readable. Now look at tables 4-1 and 4-2 and 4-3; these three tables should be combined-table headings need to be modified to accomplish this.

- Document should be more forward-looking not looking at the past or current situation but the future.

- Document is written with what appears to be little local input or knowledge--who provided local input into this plan (Upper Tanana Region). Are the plan writers aware of the gold discovery and potential mine in the Tetlin Hills?

- Much of Chapter 4 can be included in Chapter 3; this would strengthen Chapter 3. After reading Chapter 4 through Table 4-3, why should I want to read more-so much redundancy.

- Modern (current) management approach is an ecosystem management approach; ecosystems can be considered as watersheds-both sides of the stream and from top

(height of land) to bottom. As put forward in this document, the plan is not up to date. This probably true for all other plans as well. It is recognized that an ecosystem management approach probably will upset the current comfortable and political status quo.

- Knowledge is essential for understanding the area and thus for developing a plan; although public hearings were held and input was requested/obtained from various agencies; the planners, demonstrate their lack of knowledge about the Upper Tanana Area. They need to spend time in the field learning what is really there. This would eliminate many errors of omission and commission and misconceptions.

- Planning unit boundaries should be based on ecological boundaries-watershed boundaries (i.e., heights of land) not straight lines for simplicity or to follow existing straight line survey boundaries for political reasons-look at the topog map for long 144 degrees-146 degrees and lat 63 degrees-64 degrees-note the sudden topographic changes from the Johnson River drainage eastward. This would allow management of an eastern chunk of the East AK Range to be planned similarly in conjunction with the adjoining Upper Tanana Region and entire downstream watersheds as ecosystems and not a string of townships between basically two straight lines.

- Much content not up-to-date; much current data not included, e.g. inventory data for State Forest and other state lands identified as forestry and possibly habitat.

- Forest health, including beetle epidemics and role of fire, is inadequately addressed; need to look at developing resilient forests-not maintaining beetle or fire prone forests.

- Why does forestry take an apparent back seat to other uses especially habitat-forested habitat is subject to change-rapid change (beetles, fire) displaces animal habitat, for example caribou-good timber management can make this forest more resilient and address the reality that trees don't live forever. Management requires skill, to do nothing requires no skill and may negatively impact habitat for some animals and positively impact habitat for others-e.g., spruce forest with lichen converted by fire to aspen forest without lichen-former habitat for caribou, latter habitat for moose. Forestry should be considered co-designated; upland forested non-co-designated areas should have prescriptions prepared by forester based on goal determined by ADF&G managers goal.

CHAPTER BY CHAPTER COMMENTS

Title page: Previously, the plan was titled referred to as the Tanana Basin Area Plan; this Plan is now the Eastern Tanana Area Plan (title page). Is there a change in policy or delineation of plan boundaries associated with this change (title portion in bold). Are the boundaries changed for political or management simplification reasons? Do the boundaries include or exclude portions of the Tanana Valley (watershed)?

Chap 1.

Map 1-1: YTI recognizes boundaries are approximate based on map capability-however, why the straight line excluding much of the Chisana and Nabesna watersheds? There are state owned land in these area Chisana airport, RS

2477 Chisana-Nabesna Trail, recordable disclaimer of Intent issued for Chisana and Nabesna Rivers and Mark Lake (submitted, withdrawn, it the boundary between the park and the refuge-if so, say so. The straight line east of Dry Creek-what is basis for its location-is it realistic? The straight lines for northern edge of the East Alaska Range-are they realistic? Do they include areas to the south of the Alaska Range crest?

p. 1-1 para 1: Summary and Purpose of Plan; multiple use should be stated here not buried in paragraphs on page 1-5 and 1-12. Quoting Ak DNR Mining, Lands, & Water: (<http://dnr.alaska.gov/mlw/planning/>): "Wherever possible, guidelines are established that allow for multiple use." Thus multiple use should be right upfront in the document here

p. 1-1 para 3 Description of Planning Area: Clear statement of area involved (that includes adjacent lands (exclusions and inclusions) from the planning unit-this should be first thing (where it is and what it is) so that reader has a good idea of what is included-when I first beginning reading the plan, I was under impression it was the basin as in the past. Map 1-1 is good, but it needs supporting clarification. What borough is to the southwest-who manages state land north of the Alaska Range within this borough? For the plan to be comprehensive-this land should be included in the plan as well as Tangle Lakes!

p. 1-1 para 3 The "Eastern..." this is purpose of plan not description: military acreage-does acreage include military lands south of Tanana River south of Fairbanks and west of Salcha?-this area belongs in the plan. This is redundant with para 2 same page.

p. 1-3 para 3: "The Land Classification..." where in document is this-"Appendix B" state that here; it really provides no information except referring to Part III-so where in Part III. Where is Part III? Is Part III "Chapter 3? To stay within Directive of NC-10-004 terminology should not chapters be title Part I, Part II, Part III, Part IV.

p, 1-3 para 3: "Leasehold..." where in document? Appendix C:

p. 1-3 para 4: "Planning Area" should be moved to p. 1-1 para 3-see comment p. 1-1 para 3 Description of Planning Area.

p. 1-4 para 1: additional rivers should be added: Tetlin, Klutna, Nabesna, Chisana; Tok River is correct bu Little Tok River used elsewhere (see p. 3-107 line 12: the Little Tok comment)

P. 1-4 para 2: just simply list the communities

p. 1-4 para 3: You include NPS but then appear (straight line to cut it out of the plan maps. Clarify what is in and what is out-relevancy of units outside planning area have little bearing on management so eliminate except for and explain why Upper Chisana/Nabesna are not included.

p. 1-4 para 4: Tetlin reservation not part of ANSCA-includes larger area than suggested-includes both sides of the Alaska Highway and eastern edge of Tok drainage; because of this uniqueness, Tetlin "reservation" should be specifically mentioned-use official wording. This reservation is east of the Glenn Highway not west.

p. 1-6-I could not find

p. 1-7 para 1: most of entire paragraph redundant with summary on p.1-1; move to p 1-1 and eliminate from here. This is also an example of padding.

p. 1-7 para 2: should chapters be "pars"; do chapters have names? They do and their name should be after each number;

p. 1-7 para 3: word "summary" used twice in same sentence (redundancy)-delete "a summary of the" and "and a summary of plan actions"

p. 1-7 para 4: delete first "the", change "and includes" to "including"; delete "major"; change "will" to "shall"

p. 1-7 para 5: delete "an"; delete "also"; change "provides a summary of" to "summarizes"; "other management constraints"-delete "management"-redundant"; move info in para 6 to line 2 (para 5) suggested: "... of listing of the 290 management units including five LDAs (Creamer's Field Migratory Waterfowl Refuge, Goldstream Public Use Area, Chena River State Recreation Area, Delta Junction Bison Range, and the Tanana Valley State Forest) and five shoreland units on major waterbodies in the region (Tanana, Delta, Robertson, Nabesna, and Chisana rivers."

p. 1-7 para 6 and p. 1-8 para 1: Start para 6 with second and third sentences followed by the first sentence and delete fourth sentence, next sentence basically okay, final sentence suggest "Management units the Rat correspond to units on plan maps."

p. 1-8 para 2-most of para and chapter largely redundant-should this chapter even exist?

p. 1-8 para 4: change sentence to "State lands in the planning area, rich in natural resources and containing a mix of developed and undeveloped land has competing use demands." Next sentence start "Many different ideas exist about..."; "used" includes being protecte. Then: "Although some proposed uses may not be compatible with others, many compatible uses can occur within an area; Taken, as a whole, the ETAP unit and regional units are managed on a multiple use basis."

p. 1-8 para 5: end second sentence with "sold to private citizens." Next sentence rehash of things already stated. Include "specific parcels" in last sentence of previous paragraph-" ... with others on specific parcels, many..."

p. 1-8 para 6: last sentence redundant with second sentence.

p. 1-8 para 7 and p 1-9 para 1-3: verbose, bulletize the points; redundant with previous items

p. 1-9 para 4: redundant

p. 1-9 para 5: more-or-less redundant with previous material

p. 1-9 para 6 through p. 1-10 para 1-5: redundant I believe; however this entire section could be retained and previous redundancies removed; but unit needs to be rewritten

p. 1-10 para 7: this is largely extraneous; what does it add to the plan/planning

process; seems to justify plan by DNR usage.

p. 1-10 para 8: why are full agency names given again with abbreviations previous given: may be should have a glossary of abbreviations; correct to "Division of Mining"

p. 1-11 para 1: "revisions, if required," the plan must be rewritten to make it easily readable, reduce redundancy/padding, errors of commission and omission; as a resident and businessman, I am upset with this product; DNR writers need to take a business report writing course. I am not satisfied. After" rewrite, plan should be sent out again for review (shorter review period (30-45 days)

p. 1-14 & 1-15 (all) for a summary this includes too much detail resulting in wordiness-if truly needed, bulletize the items with each bullet consisting of one line or less; then should be included in Summary on p 1-1 - I make only a few comments.

p. 1-14 para 1: this is a rehash of page 1-para 1-more redundancy

p. 1-14 para 5: This is a summary within the summary-how does this differ from title of summary at top of this page?

Chap 2.

p. 2-1 line 29: Economic development should be set apart as a priority for the people of the valley. Fairbanks is an exception-government supported in terms of jobs: feds: regional agency headquarters (BLM, F&W, NPS, two military bases), state regional offices, UAF and DOF is trying to bring more people from area offices into the Fairbanks regional office complex) does the plan really support the local communities without large government infrastructure. Use of the word protect raises the question protect for whom? This question does doesn't not ignore the idea of wise-use.

p. 2-1 line 35: Fiscal Costs: to approach this goal, job creation is a must

p. 2-2 line 4: Quality of Life: goal is poor especially emphasis on everything but human quality of life (Tok area experiences 60-70% unemployment seasonally-harvest opportunities oncomes in last; this needs rewriting that defines quality of life from the human perspective; need common between "habitat and".

p. 2-2 line 6: What is meant by "natural environment"? Different people interpret this differently e.g., from "wilderness-like setting", undeveloped, to developed for resource extraction-you include resource extraction but is this natural? How does natural take into account fire and insect caused mortality" or mitigation efforts? Use of the word "natural" is inadequate. Might I suggest "maintain resilient ecosystems".

p 2-2 line 35: Can you include protection of human lives and property-such as firebreaks for protection of communities and "defendable space"?

p 2-4 line 19: agree whole heartily.

p 2-13 line 3: should not moose habitat also include a statement on the encouragement of production of moose browse species and availability, especially aspen since subsistence is a major concern/life-style component? It is more than

simply winter habitat. (Seep 2-15 line 8).

p 2-17 line 21: can you list the current endangered species and their environment by region? This would be most helpful to users of the resource-just what species are endangered or threatened in the region.

p 2-20 line 7: see comment p 2-13 line 3:

p 2-22 line 5: "are a mixture of pure and mixed stands of"-all are not mixtures

p 2-22 line 6: poplar "most" commonly found..."; it is also found on moist upland sites."

p 2-22 line 7: should read boreal forest "region"-black spruce is a forest type, black spruce-white spruce is a forest type

p 2-22 line 8: "fiber" is redundant-fiber is used for sawlogs, fuelwood, biomass:

p 2-22 line 8: as written, insert "," after fiber before and; throughout text-use comma with more than two

p 2-22 line 8: what is difference between fuelwood and firewood-if none use one or the other in lines 8, 9,

p 2-22 line 9: "fiber" is redundant-fiber is used for sawlogs, firewood, biomass;

p 2-22 line 8-10: rewrite-suggest: "Paper birch fiber has value as firewood, biomass, and limited sawlogs as long as log is relatively free of defect especially redheart."

p 2-22 line 13: change-"Some communities are using woody"

p 2-22 line 22: ETAP states "These areas are more effectively managed under the TVSF." :why in the preceding sentence is there the statement "and generally adjacent to it" when the DoF already is involved in managing areas not adjacent to the current and proposed TVSF lands. There is considerable state forest land east of Tetlin Junction (state ownerships is about 1/4 million acres north of the Alaska Highway) (see Map 3-1-Timber sales and personal firewood permits have been issued for the Paradise Hills area (east of Northway Jct.). Such lands should be included in the TVSF for simplicity in administration and management; currently these stands are orphans. I also quote (p. 2-22 line 32+: "The primary purpose of the timber management program is timber management that provides for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public lands and resources" -what better way to accomplish this than placing such lands into the TVSF and have the DOF carryout their specific mandate! How does the TVSF mandate differ from the idea of "working forest"? Is not the TVSF not a "working forest"?

p. 2-22 footnote: the suggestion that TVSF plan revision "is not for sometime" is misleading it can be amended as was done in 2003; see <http://forestry.alaska.gov/pdfs/03tvtpfinalamendment.pdf>.

p. 2-23 line 4: ...when the operational costs of administering this program 5 satisfactory." Are personal use firewood permits satisfactory; does this include overhead; are firewood permits monitored similar to p-23 line 13; if not who pays?

p. 2-23 line 7: "by allowing the use" for what-commercial timber/biomass harvest or ...

p. 2-23 line 13: "Support Timber Industry" this is not "Support" it is more like "Regulate"; I am aware of efforts to shutdown (temporarily or permanently) timber industry woods operations especially on non-state forest lands. Suggest statement: "Make timber or biomass available on a sustained yield basis from state lands to support the timber industry..." The Tok biomass sale of late 2013 meets the requirements on paper but stumpage was unrealistic (not stumpage in Idaho for biomass ranges from \$0.37 to \$ 0.50 per ton w/o foliage; in Minnesota where other products are being harvested and infrastructure in place upto plus or minus \$1.00; biomass sale stumpage was \$2.50 plus\$\$\$ for adequate site preparation and regeneration. Who is interested in such a non-realistic set of fees? What non-sale costs involved? Does this subsidize firewood permit costs?

p. 2-23 line 18: What about defendable space on a community basis such as firebreaks, fuel reduction, and also on an individual property basis. As stated, this is based on the archaic "let burn policy." The statement presented here is reactive and not proactive. It needs revision. Stands are difficult to protect but development of harvest patterns to create some resiliency should also be brought into the goal

p. 2-23 line 22: Forest health in Alaska is more than aspen-the example provided is minor; what about white spruce and spruce beetle epidemic the result of lack of stand management (even-aged, densely stock, moderate to large diameter spruce stands which is exacerbated by climatic change. Need to address the concept of resiliency not protection for forest stands.

p. 2-23 line 34: why only "community needs"? should include individual needs (e.g., firewood permits)

p. 2-23 line 45-p 2-24 line 1: It should include insect and disease management

p. 2-24 line 7: correct "allowable (annual) harvest" to "annual-allowable harvest"

Chap3

Tables 3-1 & 3-2 can you add column that provides region name? this would be helpful; Tanana recordable disclaimer excludes rivers within the Tetlin Native Reservation; does this apply to Tetlin River and tributaries including Tetlin Lake? In Table 3-2, reference is made to Tetlin Area (Includes numerous lakes with Tetlin NWR)"-does this include Tetlin Indian Reservation; since Tetlin Reservation is separate from and larger than Tetlin NWR this needs clarification. Public Recreation column is incomplete. What portion of Tetlin River is anadromous? Little Scottie, Scottie Creek (navigable), Klutna River missing from list as well as most likely others.

p. 3-1 line 16; Lake Louise and Paxson never in Tanana Basin-this discussion needs clarification-as written is confusing and hard to understand.

p. 3-1 line 17-21: this also needs rewrite so it is understandable

p. 3-1 line 25: however shorelands are separated in table 4.3-needs connecting

p. 3-2 line 4: what (I have run out of time) but rest has same issues as throughout the plan

p. 3-107 line 12: the Little Tok River is a tributary of the Tok River so reference should be made as "Tok River"; should also include Tetlin River, Scottie Creek, Klutna, Chisana River and Nabesna River-the latter two have major impact on Tanana River flows.

p. 3-107 line 13: delete "excellent" and change "several" to "the";

p. 3-107 line 16-17: the community Mentasta Lake is west of Mentasta Pass in a drainage that flows into the lake or the Slana River and then the Copper River; look at map 3-4 that shows it outside the Tanana Valley-it should be deleted. Tetlin, Northway Junction, and Nabesna are not included in the list and should be; Dry Creek is on the western border of the region and is excluded because of a straight line boundary with Delta Region, which again ignores ecosystem similarities and should be part of the Upper Tanana Region

p. 1-107 line 18: delete "excellent" and change "several" to "the";

p. 1-107 line 18-19: statement: However, much of the area off the road system is mountainous and inaccessible" much of the area is also hilly; many roads and trail extensions provide access well beyond the highway (e.g., Dot Lake, Robertson River Bluff, and Northway cell tower access roads, Tetlin Road, Nabesna Road, Northway Village Road, Paradise Hill Road; additionally there is considerable navigable waters access including Scottie Creek, Chisana, Nabesna, Klutna, Tetlin, Tok, Robertson, and Mansfield and George Lakes. Note: DNR applied for Recordable Disclaimer of Interest for Chisana River, Mark Lake, and Nabesna River and then withdrew-I oppose the withdrawal and reapplication should be made. One map I saw indicated that the request was made right to the nose of the glacier. Why were the withdrawals made. These efforts should be included in the ETAP!!!

p. 3-107 line 19: drop end of sentence after "region".

p. 3-107 line 35-37: "the largest concentration is the Tetlin Wildlife Refuge and..."-this is blatantly wrong. "Tetlin Reservation" is not part of ANSCA, is larger in area than the Tetlin Wildlife Refuge! This I believe is the largest single block of native land in the Tanana Valley and especially the region. Correct this

p. 3-108 line 1: para needs rewrite; does "special purpose) land" equal special domain land? If so use only on term or the other.

p. 3-108 line 5: "and with the requirements of this plan" what requirements? Designations?

p. 3-108 line 3-4: "for the" should be, I believe "for example, the..."

p. 3-108 line 7-9: TVSF and synonym "State Forest" used three times in one sentence (accounts for 4 of total of 23 words in sentence 17.5%). Include most of this in para starting with line 36 below to remove redundancy.

p. 3-108 line 16: add 'Taylor Highway'

p. 3-108 line 17: appears to contradict lines 18-19 of previous page

p. 3-108 line 18-19: add Chisana and Tok Junction (state-owned)

p. 3-108 line 21-para full of inaccuracies: sheep throughout the mountains south of Alaska Highway; grizzly bears throughout the lower reaches into the the subalpine throughout the region

p. 3-108 line 22: add "black bear"; what about other non-game species-e.g., wolverine, lynx as examples-the plan has a fixation on game mammals-why; should also mention golden eagles, bald eagles (tourist attraction). Should include acres (upland) wetland tin terms of acres.-just like for Forestry.

p. 3-108 line 27-18 this says nothing; look at Tables 4-1 and 4-2 and place pertinent streams and add. This demonstrates lack of knowledge of the Upper Tanana Region by planners. Also need to say following this "Areas designated Wildlife Habitat (Ha) may also contain high value forest land which can be managed for forest products and habitat simultaneously." The concept of multiple use

p. 3-108 line 30: much more land in addition to state land (native land (look at communities and lands of Dot Lake, Northway, Tanacross, Tetlin)). Similarly, mining and timber are not solely on state lands. This is puffery regarding the importance of state lands.

p. 3-108 line 36: para needs rewrite; also see comment p. 108 line 7-9 which should be incorporated in this para.; delete "at certain locations" what is "systematic forest management"-sounds good but "forest management suffices); there are other problems e.g. "genera" domain; this shows planners' lack of knowledge regarding forestry.

p. 3-108 line 44. Rewrite, delete "in this region" (redundant); how many acres

p. 3-109 line 1: para inaccurate; gold mining past, present, and future east of Glenn highway equal to or greater than west side; regarding oil and gas-there is some but of questionable economic recovery-again planners lack of knowledge.

p. 3-109 line 6: para "Little Tok or Tok" why the Little Tok; what about Chisana and Nabesna (now and potential); previously access was poorly defined. What about tourism (individuals and bus tours"-major impact on economy of Tok.

p. 3-109 line 15 para needs to be rewritten; start "Only plans affecting the region are

* 1991

* TVSF (affects access to some areas in the ETAP

* USF&WS

* BLM Lands in the Basin?

* Old Haines-Fairbanks clean up

* NPS

* Are there any management plans by ADF&G for Ha designated lands-should at least mentio even if they have none--then who manages the land (decision-making)

p. 3-109 line 15: "several indicates more than two"

p. 3-109 line 15: What about Tetlin Wildlife Refuge, National Park Service?

p. 3-109 line 16: "is" rather than "will"

p. 3-109 line 18: does this mean inclusion of errors of fact and judgment and redundancies from the past in present plan? The way ETAP is currently written suggests the layout and much information is lifted from the earlier TBAP

p. 3-109 line 27: Includes much new information so not a summary; entire section need to be rewritten to make better sense and reduce redundancies, move material to earlier paragraphs, reduction of wordiness.

p. 3-109 line 29: so nothing has changed in 30 years? What about the future (population increase with new job opportunities (mining, timber, and service; climate change real or not-remember Lake Alsek Yukon Territory existed in YT c.1850)? and with the requirements of this plan. ETAP should be forward-looking.

p. 3-109 line 31: this line is looking to the past; it ignores future developments; it can block responsible development; it supports the population centers positions regarding rural Alaska-keep the unemployment high and our recreation opportunities high

p. 3-109 line 33: does it "essentially balance"; I don't believe so-Forestry (F) takes a back seat to Ha (which ignores F), recreation, Resource Management; many cases i.e/. protect,-how do you protect; natural state (U3, U4, U5... -how do you maintain, what about biodiversity, e.g., cut forest to encourage aspen for grouse, moose browse and natural ecological succession (fire mitigation, forest resilience to fire and insect problems. This ignoring realities of ecology is simply unacceptable and ignores ecological processes and management for future goals-thinking has to change away from 1985 philosophies.

p. 3-110 line 36: "working forest management concept"; what is this? See Alaska states (2012) A WORKING FOREST is a model of sustainability that's primary goal is to unite and provide support for the environment, the social structure of communities, and the region's economy. Managed for multiple use where all industries are responsible for the sustainability of their natural resources. What is DoF's definition? Needs to be here.. Definition in Glossary places constraints (don't interfere with) on forestry practices which create opportunities (justified or non-justified) for challenges to timber sales and access roads-look at the Goodpaster mess of the late 1980s; no mention of people (jobs), economics

p. 3-111 line 1: who determined this and what criteria?

p. 3-111 line 7: "lack access"; does adjacency to the Alaska Highway suggest remoteness? Look at land east of Northway Junction; what about trail access and water access-plan needs to define (redefine) remote

p. 3-111 line 12: Table should be preferably somewhere on page 3-108 (possibly 107) right after Access para or on p. 3-109 before "Management Planning Constraints"--talk about acreages in one section, not all over the place. Acreages need to be concisely presented.

RESOURCE ALLOCATION TABLE: Despite earlier plan statements, exclusive of wetlands" co-designation with Forestry is limited with most Ha not being co-designated; this must be addressed for good wildlife management to occur. Why is multiple use typically referred to Forester (F) and rarely to other designations. This needs to be addressed. Tables need to be reworked especially designation column

p. 3-139 line 1: The eastern edge of this unit completely ignores the concept of ecosystem management-I have no problem with the use designation, but management affects the down slope watershed; recommend area east of Richardson be removed and become part of Delta or Upper Tanana regions. Use crest of Alaska Range.

p. 3-139 line 10: "641,928 million acres"? correct-certainly less than a million

p. 3-139 line 11: "(448,957 million)"? correct-certainly less than a million and "acres after the #

p. 3-139 line 18: Should this not be Map 3-5? Map 3-4 covers the Upper Tanana Region.

p. 3-139 line 24: # 448, 964 does not agree with # in line 11; separate # with space from "acres"

p. 3-139 line 30: change "and" to "or"

p. 3-140 line 19: Wildlife is not scarce throughout the region as documented further down in the paragraph and also by ignoring non-game animals e.g., wolverine? Wildlife, throughout document is biased toward big game (bears, sheep, caribou, moose) or waterfowl. The importance and thus presence of wildlife is provided for E-01-need to reconcile (page 3-143); trapping cabin suggest wildlife not necessarily scarce

p. 3-141 line 17-34: wordy, confusing the general use of area and plan (what area? whose plan? Fed or State?); be concise and specific.

p. 3-141 line 39 paragraph: wordy, what was intent of 1985 plan; what are the unique geologic features that differ from terrain features

p. 3-142 line 24: table following total acres 486,171 equals plus or minus 8% more than in lines 11 and 24 on page 3-139-does this kind of error also occur in the other regions-please check your numbers

p. 3-142 line 26: paragraph provides no real information except for reader to spend time looking for additional information-sections 16 and 36 what townships, include federal lands?

p. 3-155 line 42: how does it apply to privately owned land; previous paragraph refers to "public"

p. 3-156 line 1: why include tidelands in ETAP when there are none-just adds to wordiness

p. 3-155 line 35 compare with p. 3-156 line 5 through -redundancy (combine first five paragraphs into one or two w/o redundancy

p. 3-156 line 16 "change "ecological study" to "scientific study"

p. 3-157 line 20 through 40 incorporate into preceding paragraphs and Tables 3-1 and 3-2 sort data by region; the list is largely incomplete especially Table 3-2-why even include these tables with so many omissions reference to "Selected Streams" suggest lack of knowledge of what is there or lack of interest provide information for planning and developing.

Chapter 4

Much of chapter is redundant with other chapters or within the chapter; ease of understanding/readability is a Problem

p. 4-1 line 1 through p 4-7 line 1: Incorporate into Chapter 3; combine Tables 4-1, 4-2, 4-3 may require heading modifications; remove excess verbiage

p. 4-6 line 15 through line 18: "This Land Classification Order supersedes and replaces all previous classifications and classification orders affecting the planning area of the Eastern Tanana Area Plan with a single exception. It does not affect the classification orders pertinent to the Tanana Valley State Forest." Compare this with p. 9 lines 3-8: "This revision of the ETAP replaces and supersedes all previous plan designations and land 4 classifications (termed 'survivor') that affected the ETAP planning area. It does not replace or supersede Special Use Designations predating the approval of this revision"-much of this is redundant-what is the real difference? Except for bold basically the same. How can basically same statement have different impacts? This appears redundant and raises questions. Needs merging or clarification and belongs in a preceding chapter

APPENDIX A: GLOSSARY (by term)

AAC: confusing with commonly accepted abbrev. for Annual Allowable Cut for which plan substitutes annual allowable harvest; annual allowable harvest should be included in Glossary equating it to annual allowable cut

Department: why not just simply use DNR and avoid any confusion; change in "Department in text to DNR

Disposal: redundancy; 'Disposal ... is redundant

General domain needs to be defined or preferably removed from the text

Habitat: should include forest harvest where there is no conflict and where harvest can be used to maintain or improve habitat (e.g, conifer harvest to encourage aspen as a browse species-plan uses this argument for describing forest health which is wrong usage of re forest health. "with the following fish and wildlife categories" the question begs "what categories"?-need to address by adding "listed below"

Improvements: should include temporary, semi-permanent, permanent access roads for resource extraction (mineral, timber) and access to private property;

Instream flow reservations/Interagency Land...: need space between the two

Land offering : "They" does not agree with singular noun previous sentence

LDA or Legislatively Designated Area: Separate the two as for MCO.

Leasehold Location Order: change "Department" to "DNR"

Multiple use line 27: remove first "and"

Native-owned land: Does/should this include individual native allotments? Clarify

Navigable: What about Chisana, Nabesna, Mark Lake and adjoining streams, and other waterbodies for which "Recordable Disclaimer of Interest" papers have been filed?-I found decision on Scotte Creek but not others.

Public domain: needs definition

Public Trust Doctrine: can you substitute the more inclusive "scientific study" for "ecological study"?

Ripraian: needs definition; see uplands and you use riparian in text

RS 2477: "stands for" not stands "from"

Resource Management: based on this definition much of statelands east of Tetlin Junction is misclassified because of ready access from adjoining Alaska Highway and at least two roads to the north of from the Alaska Highway; I have logged (commercially) from one of those roads.

Shall: same as will; but then look at your' definitions of Should and Will; "Should is the past tense of shall; based on should and will, there is a difference between shall and will-please untangle the mess. Although often interchangeable; "shall" is more of mandate to do something when it comes to law and regulation-need to check for correct usage in document

Shoreland-see comment for Navigable

Special domain land-needs definition

State land, state-owned land, state-selected land-see comment for Navigable; State-land and State-owned land are basically the same--correct and adjust in text.

Wetlands: what is extent or size; as defined could be construed to include puddles and ponds present due to seasonal frozen ground or after heavy precipitation-needs reworking

Will: See "Shall"

APPENDIX B: LAND CLASSIFICATION

"The classifications in Part III are based on written justification contained in one of the following plans.." provides little information as to where it is and what it is.

APPENDIX C: LEASEHOLD LOCATION ORDER

Table C-1 provides little info of use to the non-governmental reader-where are these units? What are they-material, mine, potential mineral?

THE ABOVE IS A COMPLETE TURNOFF TO MOST READERS-IT NEEDS AMPLIFICATION WHAT IT MEANS IN NON-JARGON NON-LEGALIZE! I AM NOT EVEN GOING TO LOOK AT APPENDIX D (I LOOKED AT THE MAP-it is a strip along the north side of Alaska

Highway between MP 1386-1413 with much unneeded map area to the north and south

CLOSING COMMENT

I, my family, current and future employees, and friends, the communities in the Upper Tanana Basin are impacted by this plan. I want to see a well written plan so that we can plan our lives. The current draft is therefore unacceptable; its an embarrassment. Its content can best be judged by weight or number of pages, not information provided or quality. Reduce the weight, number, and improve the content.

Attachments: Photo of sign; and report from Edmond C. Packee, Sr.

Comment 108 of 141 - submitted on 11/10/2014 at 12:00 AM:

This is a repeat of a comment I made on the original 1985 Tanana Basin Area Plan concerning a portion of Section 36, T1N R1E FM, which was in Subunit 1W2 of the Little Chena Mgmt Unit (map 3 - 5) of the 1991 TBAP.

Most of the NE1/4 NE 1/4 Section 36 is hillside, suitable for residential use. This land adjoins Herning Hills Subdivision. An extension of Sara Lynn Road provides access through the parcel and power is very close to the eastern side. Rather than classify this 20 - 40 acres of hillside as wildlife habitat, it would be more appropriate to make it available for land disposal.

Thank you for the opportunity to comment once again.

Comment 109 of 141 - submitted on 11/11/2014 at 12:00 AM:

In The Matter of:

Alaska's proposed Eastern Tanana Area Plan ["ETAP"] dated August 2014 w/regard to:

1. Alaska Division of Lands #000037, Sublease 12A [lot 11 Block B of Clear Summit Subdivision, sublease #12A dated May 16, 1990]
2. Alaska Division of Lands #414880, Land Use Permit SE 1/4 of lot 7 Section 2, Township 2 North, Range 1 East, Fairbanks Meridian dated 09-08-1994

Et als by and through The Summit Telephone & Telegraph Co. of Alaska Inc. dba Summit Telephone Company

- - -

In The State of Alabama)) s.s. County of Baldwin)

Ex Parte Motion For Classification of "Settlement" and "Ownership" W/O Prejudice

I, Roger L. Shoffstall, the President / CEO / Owner of Summit Telephone Company hereby move that ADNR classify above ADL # 000037 and ADL # 414880 for "Settlement" and compel ADNR to make / offer to tender / sell to occupants or record at fair market value forthwith.

Respectfully, subscribed & sworn, and submitted at or near Gulf Shores, Alabama on this the 11th day of November 2014.

Attached Exhibits #:

1. RELEASE FROM A PORTION OF RESTRICTION 1, EXHIBIT A - re ADL#000037 (4 pages)
2. Lease Development Plan - re ADL#000037 (1 page)
3. Plat/diagram of Cleary Summit Subdivision, a portion of NE 1/4 Sec. 36, T3N, R1E, Fairbanks Meridian - re ADL#000037 (1 page)
4. ADNR Notice of Approval of 25 year negotiated lease - re ADL#414880 (1 page)
5. ADNR Land Use Permit - re ADL#414880 (5 pages)

Comment 110 of 141 - submitted on 11/11/2014 at 11:37 AM:

I don't agree with the state including leasehold settlements at Deadman Lake and Paradise. The reasons I oppose this include: 1) more people will be negatively impacted than will benefit - our subsistence community uses the current area for trapping and hunting. It has a very long traditional history with the Northway people. Adding any additional users especially in the way of land allocation means quite a few Northway families' hunting and trapping will be changed forever. And Northway families hunt and trap as a way of life and as a way to provide for themselves. Those who would come to the area under a lease settlement agreement would do so for recreational purposes. 2) unknown affects to moose and caribou - I cannot support a plan that directly affects subsistence and efficient local use without analyzing the risk to the moose and caribou herd due to the added people and changing features of the land including atv trails and new cabins/camps. 3) I don't feel that the DNR properly communicated to the Northway people how the Eastern Tanana Area Plan would affect our community. The meetings were not well advertised and the community wasn't actively included in the planning. There are too many questions out there on how this plan would progress and be administered after approval.

Comment 111 of 141 - submitted on 11/11/2014 at 04:23 PM:

I would like to submit a comment requesting that the Department of Natural Resources remove the leasehold locations (#34 I believe) near Northway. These leasehold locations are around Deadman Lake and Paradise Mountain or Hill. I lived in Northway for the first 19 years of my life and trapped, hunted, and fished with my family. I am constantly visiting Northway and my family. Some of the trapline that I have trapped with my family and that my parents still trap today, 30 years at a minimum, is included in the leasehold area. Many of my extended family members and certainly the entire village depends on these areas for some aspect of subsistence and traditional and cultural use. And this is a use that spans the long history of our Upper Tanana people in the area. The area is used to its maximum capacity. It couldn't take any more use. If the state decides to offer recreational/cabin leases to individuals, the leasing individuals are not going to be Northway people. They are likely to be individuals from outside of our community like in Fairbanks, Anchorage, Delta, and including non-residents. I spoke to a DNR employee engaged in the ETAP in early October who had stated that the leaseholds were included because requests were made for the specific areas and really any areas East of Tok. So I know that our people using the area now have limited resources, already have a home base nearby, depend on the lands and couldn't

afford to pay and maintain a lease & build camps would not be making these requests. Requests would likely come from non-local people. So there is a conflict here that needs to be addressed. This conflict is displacing an entire community who utilizes the area, and has traditionally for a long period of time, in favor of these individuals who are making the requests. The Northway community is a population of 220. It is important for the state to analyze the efficiency in displacing 220 people who support themselves in some form on these lands in a place where there is little full time employment in comparison to the leasehold net income. I also 100% believe that in the next fifteen years, the time period of this plan, that Northway will absolutely depend on these lands to survive and as a way of life.

The issue is that this provides absolutely no benefit to the community of Northway, the surrounding communities (who utilize subsistence and traditional and cultural use) of Tetlin, Tanacross, Dot Lake, and Mentasta, the communities bordering our village in Canada, caribou herd, moose population, and other fish and game resources (like waterfowl). The idea of placing cabins/recreational lots for non-locals and non-residents on the road system right next to our village and surrounding/directly-bordering some of our native allotments in the area our community depends on the most for moose and caribou hunting is not good planning.

I would recommend that in the update of the ETAP, the state practice due diligence and analyze areas near villages before allocating lands as leaseholds for public recreation or commercial use. This includes analysis on archeological use, historical use, current land use, community statistics, fish & game impacts, and future planning by the community and native corporations.

Comment 112 of 141 - submitted on 11/11/2014 at 05:13 PM:

I oppose the selling or leasing of lands in Northway as part of the Eastern Tanana Area Plan. These areas are used to their limits now by our village. They are our traditional hunting grounds. Trying to lease or sell these lands will create so much conflict! This is not a good idea to do this at this time.

Comment 113 of 141 - submitted on 11/11/2014 at 05:30 PM:

We oppose the Department of Natural Resources inclusion of Northway lands in leasehold opportunities within the Eastern Tanana Area Plan. These areas have been used by the village of Northway for quite a few years. Our community hunts here and depends on this land, including our own family. This is one of the areas we have raised our kids and now our grandkids on. We teach them to hunt and to be self-sufficient. We want to make sure that the land isn't sold off and moose & caribou aren't over hunted by people who do it recreationally and then our people and youth who really need this and live off of it can't take care of themselves and the future of our community. The people who want to come to our area and hunt and trap and use Deadman for remote cabin sites and Paradise for recreational lots are not more important than the many families in Northway and the future of our village. - William & Pam Albert

Comment 114 of 141 - submitted on 11/11/2014 at 07:19 PM:

I disagree with the state leasing lands and potentially selling lands near Northway in the proposed Eastern Tanana Area Plan. The community of Northway depends on the lands the state wants to lease to hunt and trap. I would not want to see a place

where I grew up on and have so many childhood memories to be removed from use by the community and handed over to non-locals who know nothing about our village and come only to hunt. These two leasehold areas provide moose and caribou for our community. The young people who hunt in our village like myself still need these areas to hunt and take care of our elders and families.

Comment 115 of 141 - submitted on 11/12/2014 at 12:00 AM:

I would like to make a series of comments about the area depicted as "SETTLEMENT" in Map 3-3 indicated as D-56. I will start more generally with comments that affect the whole then more specifically regarding Section 6, Tract A, Township 14 South, Range 16 East, Fairbanks Meridian, Alaska.

There are a number of reasons why the area should not be considered at all for settlement during the time period reflected in the new ETAP.

Fall 2012 Severe Wind Event

On September 17 and 18, 2012 a significant wind storm took place in the area. (See "Attachment 1" depicting the Craig Lake Trailhead and "Original Alaska Highway" immediately after the storm.) It is my understanding that the State of Alaska asked for this area to be designated as a Federal disaster area. Al Edgren, Delta Area Forester, partook in emergency meetings that outlined the magnitude of the wind event and held additional public meetings to warn of long term impacts such as "severe increase in wild land fire hazard to residential areas and communities within and adjacent to wind damaged forestlands due to increased fuel load from forest stand mortality." and "high potential for residential insect and disease damages to forestlands affected by wind event." Forestry engaged in some emergency timber sales in the area. Substantial portions of the area depicted as D-56 on Map 3-3 have already gone into the Forestry 5-year plan as salvage wind throw. See Delta Area Forestry Proposed 2014-18 Five Year Schedule of Timber Sales Map 6 of 6 Biomass Salvage Sale Areas depicted as BD2 and BD3, link provided . . .

http://forestry.alaska.gov/pdfs/delta_timber/2014-18_FYSTS_6_of_6.pdf

1. It is not a good idea to zone an area for settlement that will have such an increased level of extreme fire danger during the term of this plan.
2. The area of the current Craig Lake Subdivision is already designated as "FULL". Increased settlement in this area may a) increase the AREA designated as "FULL" or b) change the designation from "FULL" to "CRITICAL". These changes would already stress current response times and assets of Forestry in combating wild land fires and could significantly impact the wildfire suppression regime. The State of Alaska is facing a fiscal crisis in the upcoming years due to falling oil revenues and oil prices. This change in designation to "SETTLEMENT" creates an unnecessary additional fiscal liability that can be easily avoided by picking an area for settlement with less wild fire risk. Areas of settlement in the Dry Creek area nearby have already caused MAJOR concern for risk to life and property in the local Forestry offices due to this wind event.
3. New land owners, should this settlement designation go through, will be engaged in land clearing which necessitates lots of burning, increasing risk of wildfire to State owned lands and private landowners already living in the area. Forestry already has to issue special burn permits and has issued state owned fire fighting

equipment for the fire season to residents in the area due to the area lying outside cell/phone range making it impossible for area residents to comply with normal burn permit policies which utilize call back numbers if wind conditions deteriorate during the dangerous fire season.

4. The topography of the area is glacial moraine which is inundated with steep hilly terrain making access for both settlement and wild land fire suppression difficult.

5. Substantial portions of the area depicted as D-56 have already been scoped by Forestry into the 5-year timber management plan and was considered in the Biomass project under consideration at Fort Greely. Because of the necessitated turnaround time from the field to the proposed boiler this area's proximity to the Alaska Highway was considered critical for resource development.

Original Alaska Highway

Many people do not know that the 2 ½ mile stretch of road that comes on and off the Alaska Highway at approx mile markers 1384 and 1382 is a stretch of the Original Alaska Highway. This road goes through the current Craig Lake subdivision and provides access to Craig Lake, currently zoned as "RECREATION". Craig Lake is located in Section 6, Tract A, Township 14 South, Range 16 East, Fairbanks Meridian, Alaska just to the west of the subdivision. This 2 1/2 mile stretch of the Original Alaska Highway has recently been placed on the National Register of Historic Places. It is the only remaining intact portion of the Alaska Highway left that was built to the original 25 foot wide pioneer road standard. Intact functional wooden culverts still exist under the road and historic artifact sites exist from the original road crews at various places along the road that have been discovered. The State of Alaska Department of Archeology was instrumental in getting this stretch of road on the National Register of Historic Places and has not as yet engaged in a study of all the historic relics and sites along the road that need to be protected. A person currently driving along the Original Alaska Highway gets a true sense of what it was like to travel along this important historic road which signifies a cornerstone of Alaska History.

1. It is not a good idea to utilize the Original Alaska Highway as access for any of the settlement depicted in D-56 as shown in Map 3-3. The road is used by tourists and Alaskans for access to Craig Lake which is utilized for subsistence fishing, hunting and trapping. Parking at the trailhead, which is on the Original Alaska Highway is limited. Land on both sides for most of the road is private. No alteration should be made to the Original Alaska Highway such as adding any additional parking areas or intersections that detract from the sense of the original road. Until a proper project is made by the State of Alaska Department of Archeology to locate and catalogue all of the historical sites along the road it would be all too easy for these historic sites to be destroyed or looted.

2. Current landowners have an appreciation of the Original Alaska Highway and have been maintaining the road to its original standard at their own expense. Every effort has been made with complete cooperation from current landowners to keep the road in its original state as much as possible. Tourists have been seen from all over the world as there has been a "GEOCACHE" site alongside the road in the subdivision for quite a few years.

3. This national treasure was placed on the National Register of Historic Places AFTER the disposal of the Craig Lake Subdivision. No additional usage should take place that would violate the spirit of this designation. Vehicles left on the road belonging to individuals living on potentially new settlement land only accessible by snow machine or ATV would certainly violate this spirit. These vehicles would also be in the way of current land owners privately funded snow removal efforts.

4. This national treasure will only become MORE valuable if preserved in its original state as the years go by. Tourism is an increasingly important part of our economy as falling oil prices and decreasing oil revenues force us to diversify.

5. According to the Department of History and Archeology, "It is the policy of the State to preserve the historic, prehistoric, and archaeological resources of Alaska from loss, desecration, and destruction so that the scientific, historic, and cultural heritage embodied in these resources may pass UNDIMINISHED (emphases added) to future generations (A.S. 41.35.010)."

Craig Lake

Currently the section of land surrounding Craig Lake is zoned "RECREATION" and it has been proposed to change this designation to "SETTLEMENT". The legal description of the section of land surrounding Craig Lake is: Section 6, Tract A, Township 14 South, Range 16 East, Fairbanks Meridian, Alaska. Craig Lake has been stocked regularly by ADF&G since 1960.

<http://www.adfg.alaska.gov/index.cfm?adfg=fishingSport.lakeDetail&LakeID=1046>

Alaskans hunt, fish and trap in the area. During the tourist season tourists are seen "wetting a fly" in Craig Lake as a part of their Alaska Highway Experience after driving all the way up through Canada. The Alaska Department of Fish and Game has a tent platform, fire ring, outhouse and rowboat next to the lake which is accessed down the Craig Lake Trail and goes around the edge of the lake for some distance to the site. To a certain degree a trail system has developed around the lake both ways not just for fishing but hunting & trapping as well. At least one active trap line currently exists around the lake.

1. It is not a good idea to change the designation of this land from "RECREATION" to "SETTLEMENT". Craig Lake is shaping up to be a premier tourist stop during the tourist season whereby someone who has just entered Alaska up the ALCAN is getting exposure to "The Last Frontier" in its pristine state. Just recently the Original Alaska Highway, which is used for access to the trailhead has not only been added to The National Register of Historic Places but also had its name officially changed (with the help of Representative Eric Feige and Senator Click Bishop's offices during the 28th Legislature) from "Craig Lake Trail" TO "Original Alaska Highway". Heretofore many did not even know they were driving down one of Alaska's most important intact historic relics on their way to a wilderness fly fishing experience. Clearly, there is a synergetic positive tourism effect between the two in their current state.

2. Access to the section of land surrounding Craig Lake is unsuitable for settlement due to the narrow and steep trail with private land on both sides. Parking at the trailhead on the "Original Alaska Highway" is insufficient to hold additional vehicles in excess of its current use. In 2005 the DNR surveyed a portion of the trail to Craig

Lake and sold off Tracts I and J in the original Plat as new Lots 1 and 2 within the existing subdivision created in the early 80s. The legal access "corridor" to Craig Lake through the subdivision was reduced to 25 feet. At the time ADF&G had made a contrary agency comment as follows. "ADF&G recommends excluding Tracts I and/or J from the disposal to avoid potential public access issues to Craig Lake." THIS RECOMMENDATION WAS NOT FOLLOWED and the 25 foot surveyed trail has several very steep sections that are fine for its current use but changing the designation from "RECREATION to "SETTLEMENT" would change the nature of the trail significantly as people try to freight building materials up and down the steep slopes. It would soon be rutted out and destroyed with no option to transit on the private land on each side of the narrow 25 foot surveyed trail. Even now folks have to occasionally winch their ATVs on the steep slopes especially if they are pulling a small trailer. I notice in reviewing a current DNR brochure for staking your own land that existing trails are usually maintained with 60 foot corridors much more suitable for settlement considerations than the 25 foot ROW that currently exists on the Craig Lake Trail with private property on each side.

3. The Plan proposal identifies the settlement area as D-56 which purports to be 6,184 acres of which roughly 480 acres has already been disposed of and is in private hands. The preservation of Section 6, a mere 640 acres, in its current state zoned "RECREATION" status should not materially affect the overall intent of the settlement expansion and preserves for future landowners in the area a traditional fly fishing lake stocked since 1960 in its pristine state.

4. A relatively recent phenomena is occurring in that lakes stocked by The State of Alaska on Military land are subject to having access occasionally restricted for military exercises. This is never the case at Craig Lake as it is on State Land and makes Craig Lake even more important in its current designated state as "RECREATION". As a matter of fact we have met people from all over the world on the trail as it is mentioned in the "milepost" and affords a .4 mile short hike to a pristine wilderness area where a tourist driving up the ALCAN can fly fish. Once there a person can experience a wilderness experience without the sight of structures or the sound of generators. Let's preserve this for future generations.

2 photos attached

Comment 116 of 141 - submitted on 11/12/2014 at 12:00 AM:

On behalf of Doyon, Limited I submit the following comments regarding certain proposed land disposals near Northway in the pending Eastern Tanana Area Plan. As you may know, Doyon is the Native regional corporation for Interior Alaska. It is a State chartered for-profit corporation with more than 19,000 shareholders and was established under the 1971 Alaska Native Claims Settlement Act (ANCSA). Doyon is the largest private landowner in Alaska, with more than 12.5 million acres allocated to the corporation under ANCSA. Doyon owns ANCSA land in the Northway area. Most of the members of the ANCSA village corporation, Northway Natives, Inc., and local tribe are also members of Doyon.

We have reviewed the proposed land disposals at Deadman Lake and Paradise Hill. We are also aware of the comment letter from Northway Natives, Inc. dated October 7, 2014 regarding these same disposals. Doyon fully supports the position of Northway Natives, Inc. which strongly opposes these two disposals.

We fully understand that there is a State constitutional mandate to make lands and resources "available for maximum use". We also note that this language is tempered by these words: "consistent with the public interest."

We believe that public interest not served by disposal of lands which will disrupt long-time local uses of nearby resident citizens who depend on local harvests of game for sustenance and survival, and thereby pit them against citizens who in great likelihood are not from the area.

Surely there are potential disposal areas in the planning area which need to be considered as alternatives to mitigate if not eliminate detrimental local use impacts. Perhaps these areas would not be considered "prime" by those non-locals who likely nominated Paradise Hill and Deadman Lake parcels for disposal, but the State's obligations to address the public interest must balance local needs and non-local desires.

Thank you for the opportunity to provide these comments.

Sincerely

Comment 117 of 141 - submitted on 11/12/2014 at 12:00 AM:

I'd like to go on record for the Tok Chamber of Commerce by saying that we do not fully understand the full intent of your Eastern Tanana Area Plan (ETAP). It appears after some study that concern for our forests is not evident in the length of this document. There are many parts that are unclear to the people in the Tok area, including myself with a Masters in education.

The Tok Chamber of Commerce and business owners in Tok and surrounding areas would to see a well written plan so that we can better make plans for the future of our businesses. The current draft is therefore unacceptable; its an embarrassment. Its content can best be judged by weight or number of pages, not information provided or quality. Reduce the weight, number, and improve the content.

Sincerely

Comment 118 of 141 - submitted on 11/12/2014 at 01:34 PM:

I am a resident of Northway and don't think that the leaseholds or potential land sales should be added to the Eastern Tanana Area Plan. Northway people use these areas for traditional reasons. Everyone in Northway has hunted or continues to hunt in these spots. Removing all of our people and then adding back non-Northway and/or non-Alaskan hunters who get to have ownership of the lands and stop all the families from using their traditional areas doesn't do much good for anyone. It creates a situation ripe with conflict in regards to lands and hunting.

Comment 119 of 141 - submitted on 11/12/2014 at 02:10 PM:

I am writing this in opposition to the DNR's ETAP plan. The area selected is highly used by the people of Northway for traditional hunting and gathering activities. It can not sustain further competition for the resources.

Comment 120 of 141 - submitted on 11/13/2014 at 12:00 AM:

Thank you for the opportunity to comment on the update of the Tanana Basin Area Plan, (TBAP) in this case, the Eastern Interior portion.

Overall, we see nothing that would provide significant angst to the trapping

community, however we have several comments after reviewing the draft. Our comments are borne of experience with the original TBAP. We felt the same way about the draft and even final TBAP, but found that with time, an anti-trapping bias with several DNR employees who administered the plan allowed them to manipulate portions of it to discriminate against trappers. We realize that Area Plans are only "guidelines" but the tendency of some DNR employees to manipulate parts of it or to ignore it as "just a guideline" when it suits their purpose is frustrating for users who are actually out there on the land.

With this in mind, we have general comments and then will attach items specific to the draft to this cover letter.

The first general comment is to encourage planners to put yourselves in the place of the trappers who are actually out there using state land. Please try to remember that trappers utilize these lands at a time of year when most other users do not. That temporal separation is normally quite adequate to avoid user conflicts. Occasionally the odd skier or dog musher will find a trapper's trail and cause problems. However, for the most part, there is no need for spatial separation. Perhaps more importantly, when this spatial separation does become necessary, it is the purview of the Board of Game to resolve conflicts, NOT DNR. There is really no need to preclude trapping activities such as cabin building, trail construction, temporary bridges, etc. There is no sense in trying to craft "planning type" solutions for these operations without practice input from trappers. It's not necessary and many times, counter-productive.

There are several places in your draft that euphemistically refer to consumptive uses of wildlife/fisheries as "dispersed recreation." In each case, your wording (e.g. p. 1-10) referred only to hunting and fishing. Since for the bulk of every year (some 7 months) there is NO ONE EXCEPT TRAPPERS out on most of the land in the planning area, we hope that you would consider adding the word "trapping" to your description of dispersed recreational uses. There are hundreds if not thousands of trappers using the state land in question and it seems only fair that you would come to recognize this as you craft your final plan.

In general, trapping activities do not require facilities or improvements other than cabins or tent platforms and gear caches. In fact, further development of facilities is the antithesis of what we prefer.

Please remember that trappers are trail builders. Their trails have minimal impact and are only used seasonally. Unfortunately, these trails are sometimes "discovered" by less hardy recreationists who then unfairly complain about "conflicts."

Please do not try to differentiate between commercial/recreation/subsistence/personal use trapping. Differentiation of this nature is not supported by either state or federal law.

Thank you for the opportunity to comment. Comments on specific items in the plan are attached.

Sincerely

1-4 In mentioning the primary tree species, you neglected to include the most numerous species/subspecies & Willow

1-10 Under Fisheries Wildlife, it is Boards of Fisheries and Game The Boards are statutorily separate and distinct.

1-10 In the GAU's please mention hunting, fishing and trapping

2-3 Line 2, please include trapping

2-17 Line 32, please remove references to federal permits. Since USFWS insists on ignoring ADFG/BOG rules and regulations (that they disagree with) on Refuge land, why would the state fall all over themselves to accommodate FWS mandates? Let FWS do their own enforcement work without State assistance.

2-18 Dall Sheep. This section should include at least mention of the likely negative aspects that invariably happen when domestic stock grazing occurs in proximity to Dall sheep habitat.

2-24 Line 10, references Personal Use Wood Harvest, saying that "Program will only be undertaken if it can be effectively and efficiently administered by DOF." This is a shirking of DOF's responsibility to provide personal use harvest. It is not the public's fault that DOF is unable or unwilling to investigate every place where personal use may occur. In fact, most Alaskans really don't need that level of supervision. DOF (at least in Fairbanks) have a poor record of administering personal use fuel wood/cabin log programs. Their failures should not be used as a reason to penalize the public.

2-25 Line 10. Salvage of Damaged Trees. Fairbanks Area Forestry has in the past had a policy of not allowing personal use cutters to utilize standing dead timber (damaged trees.) For example, in burned areas. Their stated reason is that the public cannot tell the difference between a live tree and a dead one. Since standing dead timber provides the driest, best and cleanest burning fuel, it seems counter-productive to allow these trees to rot on the stump. There is no shortage of trees in the Interior. If a few green ones are sniped, more will grow.

2-34 Access. Tasking DNR with identifying new, additional 17b easements is a very good idea.

2-39 Recreation Opportunities. Be careful with attempts at "management to minimize user conflicts." This should not be used as a tool to prohibit trapping in specific areas. That management is the sole purview of Board of Game, NOT DNR planners.

2-42 Reservations of Water. DNR should actively resist current efforts of the National Park Service to wrest control of water and water-borne activities on navigable waters. E.g. the NPS enforcement over-reach on the Yukon River near the Yukon-Charley Preserve just NE of the planning area.

2-43 Settlement. Please seize the opportunity to discontinue siting sub-divisions in fire prone areas. This strategy invariably ends up costing the state millions of dollars in fire suppression activity. You hint at this in the "Protect Life and Property" section (line 18, 2-47 and Cost of Public Services, line 31, 2-49.) It needs to be clear. The state happily allows permitted Trapper Cabins (TCCPs) to burn to the ground, but then spares no expense to protect state sited rural subdivisions.

Note: In your descriptions of Unit LDA's, there are a lot of small geographical inaccuracies. This appears to be the result of planners working with maps rather than gaining any practical experience or field presence. You could gain yourself a LOT of credibility by having field personnel review these charts. 4-2 State Land Classification. Line 34. In the description of Public Recreation Land, only hunting is mentioned. Please add: trapping.

Glossary

A-3 Line 22. Hunting and fishing are listed as "Dispersed Recreation." Please add trapping.

Comment 121 of 141 - submitted on 11/13/2014 at 12:00 AM:

Attached is my public comment containing a wealth of information I am sure you are unaware of. Please take the time to read it carefully. I encourage you to not look at a quick solution to fulfilling your position requirements but to look into the future and doing what is best for all of Alaska.

Keep in mind; this is in the unorganized borough of Alaska. The legislature is the official governing body over the unorganized borough.

Currently there is no state money to develop a tourist attraction with this historical road and surrounding area. Some day there may be. Preserving this entire area is essential to allow for this to unfold into the future.

Thank you for your consideration in removing the area of concern for settlement (D-56) from this cycle of the ETAP.

I am writing in hopes of helping prevent another error from being made that cannot be undone. I am using this opportunity to share with you the information I have about the affected areas within D-56 of the Eastern Tanana Area Plan (ETAP.) It is important, especially for those of us who work for "the people," to make sure that when we make decisions that affect the lives of others and "the people" as a whole, we are not ignorant of history or the facts surrounding any of those decisions. After the decision, to use the words, "we didn't know" is unacceptable.

REQUEST

I am requesting that the entire glacial moraine of the second glacial period of time (part of D-56) be designated as a recreational area. This area would encompass the current recreational area that exists today and a portion of the state land assigned to forestry. This is not all of D-56. This is only the portion of D-56 that is the second glacial period, not the first. This is the dramatically steep hilly area and not easy for roads of any kind to be built. This is the area of the historical Original Alaska Highway and small Craig Lake stocked since 1960. This area is also known as a nursery for cow and calf moose. It is raised in elevation and has the potential of being a future state forest.

INTRODUCTION

The area known as D-56 in the ETAP affects a significant historical era of Alaska's history and is becoming more significant with time. This is the Alaska Canadian Military Highway, also known as the AICan or the "Alaska Highway." In 2013 a portion of this road made the U.S. National Registry of Historical Places. This effort

did not come about because of the efforts or the foresight of the government or a bureaucracy. In fact, this historical landmark was almost lost. It came about at the will and foresight of "the people" and their desire to have future generations not forget the times in our history when we were able to achieve great things with the desire and passion of the people, minimal resources and very little time. It's the grit from the people that made this country not only great, but also respected around the world. Examples like these need to be preserved and remembered.

HISTORY - LAND

Error #1: Not Recognizing Historical Value

In the 1970's, after the realignment of the original Alaska Highway, a meaningless piece of that highway was discarded and identified as nothing more than an access road. Little did we know then, this discarded road would end up being the only intact piece, in its original state, of the infamous original Alaska Highway remaining. No one caught it. Not the legislature, the bureaucrats or the people. This area could have been a perfect historical State Forest / Tourist attraction but no one did anything to recognize its historical value and preserve it in its original state and esthetics.

Error #2: Subdividing

The state decided to sell some of the land along this access road. In the 1980's, a portion of the land on both sides of the road was divided up and offered via lottery drawing. Though this did occur, there are very few disruptions in the esthetics along the road. Many of the tracts are still not developed and any existing structures cannot clearly be seen from the road; only a few gates are visible. Again, this area could have been a perfect historical State Forest / Tourist attraction absent of any residents or man made structures but no one recognized its historical value or did anything to preserve it in its original state and esthetics. What was recognized was the recreational aspect of the area. This was prevalent by the non-disposal of three of the tracts when the subdivision originally took place.

Error #3: Selling Large Ponds and Access

In the original subdividing, three tracts of land of the section were not disposed of because of public access to large ponds, Craig Lake and the surrounding recreational and state land area. They knew what they were doing. They went out and walked it. They had to back then. This explains why these three pieces were never originally disposed. In approximately 2007, these three remaining tracts were auctioned off.

Employees filling those shoes 25 years later, most likely using google maps, never thought to ask why these tracts were not part of the original lottery. The disposal of those tracts removed from the public, 2 large ponds and easier access to recreational land and Craig Lake. The access to Craig Lake is now down a 25-foot wide steep trail.

I met a man who was disappointed to learn that the land he once used to get to his bear baits, had been sold along with easier access. It was one of the three tracts I have been speaking of. He had with him a handicapped individual in a large ATM needed for transport and it was not able to make it down the steep narrow 25-foot

trail. Once the land was sold, access options were reduced to this existing recreational and state land.

HISTORY - ROAD / NAME

Filing with Department of History and Archeology

In 2006, a gentleman who worked on the realignment, Loren Benhan, filed the paperwork necessary to nominate this access road into the "U.S. National Registry of Historical Places." Because he personally worked on it, he knew it's historical value. Unfortunately, there it sat on the corner of the desk in the Department of History and Archeology until 2013. By that time, it was obvious that all involved parties had forgotten about it. Mr. Brenham had actually given up on it after hearing nothing for so long.

2012 Wind Storm

In September 2012, a windstorm hit the area between Delta Junction and Tok. Winds were clocked at 114 mph before the wind gage broke. Thousands of acres of forests were flattened. Fortunately, there was no loss of life and structural damage was minimal, mainly because few people actually live in that area.

Forestry applied for this area to be designated a Federal Disaster Area. Forestry contacted the residents and informed them that life as they knew it had instantly changed. In the recent upcoming years, the spruce beetle would infiltrate the damaged spruce and the fire danger will become not only high, but extremely dangerous. In other words, the possibility of fighting a forest fire in that area would probably not be feasible as it would endanger the lives of the fire fighters. It was made clear that risk to personal safety and life just went up substantially.

Instantly, a local logging organization that makes wood chips for biomass products was pulled off of their current area of operations and relocated to the entry/exit points near a small community in the wind damaged area. This was to mitigate forest fires around the only exit route of the community in case a fire did break out.

Forestry was asked by the locals to submit comments on the ETAP due to the recent wind throw. Forestry stated that they submitted a comment 2-years ago, before the windstorm, not recommending this area for settlement. Forestry then said, "They don't listen," alluding that this additional effort would be a waste of time. Therefore, they declined to submit comment with further update to the circumstances and increase fire danger is this area.

Focus on the Road

A biomass project out at Fort Greely was quickly surfacing and the timeliness of the natural forest damage, Fall 2012, was perfect. The forest damage could be used for biomass. There was one major problem. Forestry wanted to use the historical Alaska Highway (this access road) for access to the forest. Forestry, at this time, did not know this was the original Alaska Highway and neither did most people.

As far back as anyone could remember, there was no street sign on the road. It was just a dirt road leading into the bush to Craig Lake, which was stocked since 1960. That's over 50 years. This road was not maintained by anyone except a few of the landowners, which came and went, off and on.

In the summer of 2010, a road sign appeared with a street name "Craig Lake Tr" and stop sign. Locals in the area researched the Deltana Community Corporation and Department of Transportation records to find out who picked the name and who paid to have it produced and installed. Their efforts produced nothing. No one had any records of how this name came to be. The unfortunate part is, many tourists drove down that road and never knew they were on the Original Alaska Highway because it was not named or was incorrectly named.

U.S. National Registry of Historical Places

The locals in the area knew of the road's significant historical value and did not want forestry doing anything to damage or destroy the road or its visual original esthetics. Once again "the people" in opposition to Forestry took action and contacted the Department of History and Archeology to try and protect the road. There they found that Loren "Squeaky" Benhan filed paperwork in 2006 to protect this historic road and that paper work was still sitting on a desk in the Department of History and Archeology. This was some time in 2013.

Four months later with 'the people's' perseverance, Alaska's infamous Original Alaska Highway was officially entered into the U.S. National Registry of Historical Places. Congratulations Alaska! The Department of Natural Resources (DNR) was required to officially document and record the name of the road. The Deltana Community Corporation (DCC) is a conduit for state funding and projects for the area outside Delta Junction in the REAA 15 area, which encompasses this road. They have no taxing or governing authority. They installed the new "Original Alaska Highway" street sign.

Why Recreational?

1. Contains the Historical Original Alaska Highway
2. Contains a small pristine wilderness lake, Craig Lake, which has been stocked since 1960. It is accessible year around and provides a secluded wilderness experience, which currently has a tent platform, outhouse, and rowboat.
3. Terrain is steep, hilly, and boggy in places.
4. Closed birch forest and black forest mix, which is good for exploring, trapping, hiking, wilderness camping, snowshoeing and snow machining.
5. This area is already a frequently used recreational area by locals and tourists (international and Americans).
6. The area is a nursery habitat for cow and calf moose.
7. International Geocache located on the road.
8. Potential for a large accessible wilderness state forest with historical value.

Why settlement not recommended?

1. High fire damage and wind thrown area.
2. Original Alaska Highway cannot sustain permanent parking or high volume

- temporary parking or high volume traffic without changes and possible damage.
3. Archeological areas not yet investigated along the side of the road.
 4. No cell phone coverage.
 5. No electricity.
 6. No water found at 450 feet.
 7. Kettle ponds collect rain and snow only. Drought years they drop significantly.
 8. Section lines go through ponds and bogs.
 9. State can make more money off of timber sales than land sales.
 10. One forest fire with landowners to protect will cost far more than what is made from land sales.
 11. Within the last seven years, many parcels of land were for sale in this area for long periods of time, years, before anyone bought them.
 12. Forestry and Fire Department over 40 miles away.
 13. Potential for a large accessible wilderness state forest with historical value.

SUMMARY

I am currently on the Board of Directors for DCC. This area is part of the REAA 15 area, which DCC represents. I do not speak on behalf of the board and speak only for myself.

I have done my best to relay to you all the information I know about this area that is going to be, in my opinion, negatively affected by changing the zoning to settlement in the proposed D-56 ETAP area. I d like to propose a positive change. I would like to recommend increasing the size of the current recreational area to encompass the second glacial moraine period. This is the elevated steep section of the glacier moraine area of D-56.

If that is not doable at this time, then I recommend the current ETAP for D-56 be left as is until time can ascertain the long term affects of the natural disaster area. The current recreational area definitely needs to remain unchanged at a minimum. Shame to the planners that dispose of currently used public recreational areas. Think good and hard before disposing of state land that is also used recreationally.

Thank you for your time and consideration.

Regards

Comment 122 of 141 - submitted on 11/13/2014 at 09:38 AM:

Greetings, My comments are regarding the ETAP in the Delta Region, specifically the Craig Lake area (unit D56, map 3-3). I completely disagree with the proposed designation change of Craig Lake and surrounding area within Section 6, T.14S, R.16E, F.M., from Recreational to Settlement. It makes absolutely no sense to take a currently and correctly designated Recreational area, complete with an existing ADF&G stocked lake, public camping area, developed and monumented public trail

(not a road), and change its designation to Settlement. This is a Recreational area used by the public. I use Craig Lake and the area around it for hiking and fishing. I've come across folks from Delta to Tok, Fairbanks to Anchorage to Juneau along the trail and at the lake. I've met tourists who happen along and take the walk in to the lake. Craig Lake and the area around it is designated correctly as Recreational. Other than the fact that it does not have a cabin, it should be looked at no differently than Lisa Lake for its recreational value. There is plenty of other state land in the area for settlement without including Craig Lake or the land around it & within Section 6 T.14S, R.16E. The terrain in this area is old glacial moraine, full of steep hills and knobs, complimented by big holes and kettle ponds. Because of this terrain in this area, the section line easements don't provide realistic, constructable access to much of the land. Kettle ponds straddle section lines in areas and make access via section line easements impossible. The steep hills and side slopes one would encounter along section lines would make even winter access impossible. This might encourage settlers to try to use the Craig Lake trail, which is a 5' wide trail that winds through the woods within a monumented 25' trail easement. This trail has been used in its current state for years (since prior to 1985). If settlement is allowed within Section 6 (Craig Lake area), Settlers will be tempted to widen the trail to get building materials back to their settlement sites. I would implore you to visit this trail in person, boots on the ground, to witness the natural character of the trail, and also the terrain in which it crosses. Very steep grades and side slopes - not at all suited to hauling anything. This trail is traversed mainly on foot. Occasionally there are ATVs or snow machines on the trail, but the grade is so steep that even those transportation methods are challenged. If I leave you with anything, please know that the land within Section 6, T.14S, R.16E (to include Craig Lake) is designated correctly as it is 'Recreational'. I am against ANY changes in the current designation. DNR got it right the first time. Don't mess it up now! Thank you for this opportunity to comment.

Comment 123 of 141 - submitted on 11/13/2014 at 01:59 PM:

I wish to make comments regarding the ETAP in the Delta Region, unit D-56, map 3-3, Public Review Draft page 3-98, specific to Craig Lake being proposed as settlement. This change from recreational to settlement is a bad idea for several reasons. Please retain Section 6, T 14S, R 16E, in state ownership, and manage to maintain and enhance public recreational values.

Craig Lake is popular for recreation and is used by the public for recreation. Page 3-79, paragraph 2 of the Public Review Draft states that lands where the level of public use is apparent should be retained in state ownership. Opening lands adjacent to Craig Lake will deteriorate the level of scenic beauty and isolation that this lake offers to residents as well as tourists traveling the Alaska Hwy. ADF&G stocks this lake and has constructed camping facilities for recreational use within 50 feet of the ENE portion of the lake.

The current public access trail (.4 miles) to Craig Lake begins on the Original Alaska Highway and passes via a 25 foot trail easement adjacent to private property in the Craig Lake subdivision. This trail is suitable for small ATVs and snow machines but due to steep grades and side-slopes is not suitable for the freighting of building material or construction equipment which settlement would encourage. Alternate routes to this area such as section line easement are next to impossible due to terrain such as described in the draft on page 3-98, specifically steep terrain and kettle ponds. The existing trail may well be destroyed by persons seeking access to

a land disposal near Craig Lake.

The Original Alaska Highway located between approximately mile 1382 and 1384 of the Alaska Highway, a roughly 2.5 mile stretch, and only remaining intact portion of the historic Alaska Highway has been placed on the National Register of Historic Places and should be preserved to the best possibility in its original state. This road is currently maintained by 2 owners of private parcels in the Craig Lake subdivision at private expense. Additional land disposals along this road could be detrimental to the preservation of the road as well as cause strife between users. Please retain lands adjacent to the Original Alaska Highway in state ownership.

High wind events during September of 2012 caused extensive tree damage to this area creating a serious increase in wild land fire hazards as was identified by Delta Area Forestry. Thousands of trees were toppled and many more damaged and left dying over the next several years. Traditional burn permits are ineffective in this area due to extremely limited and/or lack of cell phone coverage. Land disposals would increase the potential for human caused fire in this area. Access for ground based fire suppression would be difficult at best due to terrain.

Personal experience with property access in this area has taught me that platted easements are not adequate. Having owned a parcel in Craig Lake subdivision for several years prior to bidding on an adjacent parcel that can only be reasonably accessed through the first parcel, it is evident that maps and surveys are done without having feet on the ground. During the Spring 2007 Land Offering Auction #446 numerous trespass violations occurred on my private land by persons engaged in the inspection of Track O, Craig Lake Subdivision, in spite of my property being properly posted and the legal access being flagged by me. The state of Alaska should not offer land disposals that put existing owners of private property on the defensive. It is obvious that the general information section of the land offering brochure does not protect private property rights. This area is old glacial moraine and the topography varies wildly from extremely steep to kettle ponds over very short distances. This is not good terrain for additional settlement.

I sincerely invite Alaska DNR to contact me for an on-site inspection of existing trails and easements. Please retain state ownership of Section 6, Township 14 South, Range 16 East, Fairbanks Meridan, Alaska, and state lands along the Original Alaska Highway.

Marty Laudert 3238 Edby Rd Fairbanks AK 99709 chmallk@yahoo.com 907 460 1953

Property owner in Craig Lake Subdivision

Comment 124 of 141 - submitted on 11/13/2014 at 04:33 PM:

I do not support the proposed land settlement sale by Northway included in the Eastern Tanana Area Plan (ETAP) by the Dept. of Natural Resources. This land is Northway's traditional hunting lands and the people depend on the moose and caribou for their subsistence lifestyle. The cost of living is extreme

Comment 125 of 141 - submitted on 11/14/2014 at 12:00 AM:

Referencing the Craig Lake zoning designation that is currently 'Recreation', and its proposed change in designation to 'Settlement', I am concerned that this would

eliminate the general public's access to a road (and short trail) accessible lake that is used for sport fishing.

Sport fishing opportunity for the general public would be greatly compromised by this change in designation.

I am in support of well reasoned changes to the Eastern Tanana Area Plan; however this proposed change in designation would not provide a benefit to the general public who are looking for more sport fishing and tourism opportunities.

Would it be possible to look at other land selections for settlement opportunities in the Eastern Tanana Area that the public would support, in lieu of the Craig Lake area that has had fish stocked in it since 1960?

Thank you for your consideration

Comment 126 of 141 - submitted on 11/14/2014 at 12:00 AM:

As the current operating manager of Cleary Summit Investors LLC, herein after referred to as CSI, I would like to run through a brief timeline of what has taken place at Cleary Summit since the original 55-year lease was signed with Robert McCann and DNR in April 1959.

Designated as ADL # 37, the lease was for the purpose of forming a subdivision at Cleary to support McCann's downhill skiing operation. In June 25, 1973, subdivision plat was endorsed and approved by the then lands director of DNR for Cleary Summit Subdivision. It was at his point the state of Alaska put its seal of approval on future residential development at Cleary Summit regardless of mineral leases and sub-surface rights. Since that time, many year-round permanent homes have been constructed in the subdivision, as well as many recreational cabins.

Fast forward to April 1999, we were informed KeyBank Alaska was foreclosing on the master lease with Cleary Summit Inc. (Robert McCann, et .al.) and McCann's interest assigned to KeyBank would be sold at public auction. Cleary Summit Investors LLC was formed for the purpose of the purchase of the foreclosure from KeyBank (where our homes are located) with assurances from DNR personnel in Fairbanks that once we received the interest in the master lease, the state of Alaska would be glad to accept an application for those sublease holders for preferential purchase rights. The same person stated that this was the only lease of this type that in the state of Alaska and the state was anxious to get rid of it. "We will cooperate fully to transfer Cleary Summit Subdivision properties to the sub lessee's."

In August 1999 and application for Preferential Purchase Rights was made to the DNR division of lands northern region in Fairbanks and was accepted by the state after the required fees were paid. Fairbanks personnel again seemed cooperative and willing to assist in making us transfer possible and the outline for accomplishing the sale were discussed at some length such as a necessity for appraisals etc. and an appraisal order was placed with Jim Hage, a Fairbanks DNR approved appraiser. CSI Operating Manager at-the-time, Gary Roth, was then told that the application would be sent to the legal department for review and consideration. The person assigned to this review in the legal department was Leigh Carlson. Over the next several months, Mr. Roth confirmed with Ms. Carlson on many occasions about the progress of the application. He was advised that nothing had been done for some time because the state was totally involved with mental

health plan school trust lands, etc. and that the lease had 14 years remaining on it and they could not understand the need for any immediate action. It was explained to her that many subleases wanted to build new structures on the property, remodel or expand and also drill water wells and make other improvements. After 18 months, nothing had been accomplished as reported to Mr. Roth and he was then advised that all files of this nature would be transferred to the DNR office in Anchorage and that the Fairbanks personnel would have no further action on this application.

Manager Roth was given names of people in Anchorage for contacts and Mr. Dick Mylius was assigned and assured him that progress was moving forward on this application it would be under the supervision Romero Escobar. Many contacts were made with Mr. Escobar over the next year and all were met with a response that no further action had been taken.

Mr. Roth then contacted Senator Wilkins' office and legislative assistant Kara looked into the situation and we believe talked to Mr. Mylius however several months later follow-up and nothing else had been done.

Winston Burbank, attorney, acted on behalf of the LLC and sent correspondence to Mr. Escobar which was never answered. Sometime in 2003, Mr. Escobar stated that he was no longer working in that position and the file would be reviewed by a new person in that position when it was filled. In January 2004, we were able to ascertain Andrew Liebig had been slotted in that position and Roth traveled to Anchorage to visit with Andrew and he assured him that the file was on his desk. Yet again, the file was reassigned in September 2004 to Thomas Williams, a recent entry into his position, and said he would need at least 90 days to review the 600 page file. In February 2005, Roth visited and with Mr. Williams and said he had been reassigned to another department for work for the next six months and nothing could be done on the application during that period of time.

On March 25, 2005, a letter was written to the Honorable Governor of the State of Alaska Frank Murkowski detailing the frustrations we had had with the process to date. A meeting was later held with the Governor's Fairbanks staff person, Cherrie Solie, with regard to our frustrations although no actions came of that meeting.

In September 2008 a letter was written by CSI Operating manager Tom Walyer to the DNR commissioner Tom Erwin and his response was received in August 2008. Again, no action was taken on the Preferential Purchase Application.

On April 30, 2009, manager Walyer received a certified letter from the state of Alaska returning our preferential rights purchase filing fee that had been received by the state some 10 years earlier in 1999.

Again, fast forward to early 2014 when the 55-year lease is about to expire and we find that we will not only not be able to obtain a preferential purchase right, but also, not be able to obtain any sort of long-term lease or conveyance from the state of Alaska. This leaves subleases again (as they have been in the last 15 years) in the lurch as they are not able to finance, expand, build, sell, or do anything with their property. This means no bank financing, no selling, and no improvements for another five years.

On a personal note, I have owned my home in the Cleary Summit Since 1978 and

many of the original subleasees (not unlike me) are aged and would like to sell or perhaps have passed away since the original signing of the subleases. As residents many of us have donated time and money as well as purchased equipment to maintain the roads both winter and summer. The ditches have been kept clear of brush and maintained allowing safe access to all our homes. We would all like a resolution to our dilemma in a timely manner and not another decade s long struggle in protecting our homes with the State of Alaska.

Comment 127 of 141 - submitted on 11/14/2014 at 12:00 AM:

We are writing to provide comment on the Eastern Tanana Area Plan proposed by the Department of Natural Resources. From the start, the plan for creating settlement areas in the Eastern Tanana Area Plan has caused a pervasive uproar from Native residents of the affected villages. We believe that the State needs to reconsider their land-use designations that pose substantive adverse effects on the culture and economies of Upper Tanana Area Native communities. The DNR Planners have their planning process turned upside down by proposing land designations that threaten the way-of-life of village stakeholders before they outreach to those communities. Planning should include outreach to local state residents during the initiation process of a new area planning process.

The administrative code of the state should guide planners to initiate their process by visiting the state residents in the area where new settlements are proposed before reclassifying lands to the detriment of those communities. In this case, residents of the Native villages in the Eastern Tanana planning area are substantively concerned about encroachment by non-local residents who pose significant adverse user conflicts with the customary and traditional practices of local residents.

The state planners should clearly be aware that much of the land transferred to the State of Alaska subsequent of Statehood are the domain of traditional use areas of rural, Alaska Native residents. Those lands continue to be used for hunting and gathering purposes for traditional food security. The settlement parcels proposed in the Eastern Tanana Area plan in the Northway area basically propose to institute significant encroachment on local hunters and gatherers whose families have traditionally used that area for generations and continue those practices today. There are hunting cabins, camps, traplines and other traditional use areas in that geographic zone. The Paradise Hill and Gardiner Creek lowland areas are zones of high food harvests by Northway residents. Opening the area to settlement fundamentally removes those customary rights by imposing significant user conflicts.

We have a letter from Roy and Avis Sam that explains this more thoroughly and resubmit their letter as an attachment to these comments. The state needs to consider the community values of the local residents commensurate with their rights as residents of the State and the inherent rights of Alaska Natives peoples. The plan proposes to support "vital, self-sustaining, diverse local" economies (page 2-1). The Plan also presumes to "minimize conflicts between resources and uses" and "protect the long-term value of the resources, public safety and the environment" (page 2-4). Furthermore, the assumption of the Plan is to "provide local governments . . . meaningful opportunities to participate in the process of making significant land-use decisions" (page 2-9). The following comments refer back to these premises of the Eastern Tanana Area Plan.

Mr. and Mrs. Sam of Northway bring up a significant issue beyond the traditional uses of the Paradise Hill and Gardiner Creek Area. They own a Native allotment in that area and oppose the proposed settlement zone to non-local Alaskans due to past experiences of trespass and vandalism by seasonal, non-local users. Tanana Chiefs Conference manages Native allotments in consultation with allottees and continuously deals with pervasive trespassing on Native allotments throughout the Interior. We understand that the planners have not met with the Native allotment owners whose land would be surrounded by new settlement lands. In the Paradise Hill area there are two allotments within the U-58 settlement boundary and eight in the vicinity. For the U-53 Gardiner Creek settlement parcel, there are five allotments in the vicinity. State planners need to consult with those landowners about the proposed changes in land designations that could significantly affect their current uses.

The proposed settlement lands would immediately create a subdivision around these Native allotments. The change in land-use patterns has the potential to create access issues, impose user conflicts, immediately create prospects of trespassing and invite broad encroachment into their restricted allotment lands and surrounding use area. The administrative code requires the DNR to take into consideration the interests of other landowners and this requirement has been violated with regard to Native allotment owners in the planning area. With respect to the Plan, the Settlement guideline purports the State planners designated the Settlement parcels with regard to "compatibility with adjacent land uses" (Page 2-44), but this appears to be in conflict with what we've heard from allotment owners and local residents. The proposed settlement lands in U-58 and U-53 need to be changed to habitat.

The Eastern Tanana Plan is silent on law enforcement protection to offset the proposed impacts posed by the Plan. TCC staff attended a community meeting in Tanacross on October 31 where similar concerns were expressed for lands surrounding their village. Local residents in these areas favor habitat land designations over settlement prescriptions. Many of the concerns expressed in that meeting (held to discuss the Plan) echoed the concerns expressed by the residents of Northway. One of the substantive issues concerns the moose breeding zones in their areas where locals want to preserve those zones as habitat for sustained yield purposes. Habitat designations would help avoid a collapse in the local moose populations that may otherwise result from overharvesting by outside, unconcerned user groups.

The meeting in Tanacross was called to respond to the Eastern Interior Plan among concerned local residents since the State had not convened a meeting in their community. Tanacross residents are particularly concerned about the plan because no effort was made by DNR to hold a public information meeting in their community. Many residents had not known of the sanctioned meeting in Tok. In an audio conference on November 12, Tanacross officials expressed clearly to State planners that Tok and Tanacross are not the same communities and warrant separate meetings. This is an important point to emphasize. The State land planners should conform to their required code to hold meetings in affected communities. The discussion accentuated this issue and emphasized the need for State planners to schedule a meeting in Tanacross before they proceed toward adoption of the Area Plan. The State needs to pursue discussions with the Native village councils over local land-use and community plans for those areas. The planning process also

need to consider local residents' ideas and long-term plans for multiple uses on state lands in their areas.

Another concern regarding the lack of meaningful communication and coordination on land planning was expressed to TCC officials by board members of Alaska Native Claims Settlement Act (ANCSA), village for-profit corporations. The State and village for-profit corporations share interests in economic development, but those concerns have not been addressed or considered in the Plan. These entities are mentioned on Page 1-4 of the plan but not integrated in decision-making as the plan promises on page 2-9 (cited above in this letter). The ANCSA village corporations are the largest land owners' in the planning area and deserve meaningful consideration in the planning process. The State is required to take into account any and all local, municipal and other land use plans in the region, including plans by Tribal governments and private land owners. The Plan does not consider potential economic development opportunities with the large private landowners in the planning area.

Coordination and cooperation with local Tribal governments and village corporations would offer the state input to blend management of their lands in connection with local values. Some of the subsistence camps have been used for decades, centuries and, perhaps, millennia. The traditional use areas include camps, graves, traplines, berry picking sites, and hunting cabins. These cultural resources are managed under the Alaska Historic Preservation Act as presented in pages 2-11, 12) in the Plan. Some of these long term use sites may qualify as archaeological resources and the State planning process is designed to classify such lands as "Heritage Resources Land". Astonishingly, not a single acre of the 6.5 million acres considered in the Plan is classified as Heritage Resource Land (Tables 4.1, 4.2 and 4.3). This is particularly acute given that earlier this week the National Academy of Sciences and the National Sciences Foundation issued a joint media release on a heritage site in the planning area that is considered one of the most significant prehistoric discoveries in the New World. There are other significant heritage resources throughout the planning area, including rich ethnogeography of Native place-names that are not mentioned in the Plan. The omission of this information in the Plan brings the entire planning process into question.

One example of heritage resources includes archaeological collections from a district of heritage sites around Deadman Lake near the proposed settlement zone U-53. This series of sites are on Northway Natives land and the extent of significant cultural materials suggest there are more extensive cultural resources in the area. A second example is in the Paradise Hill area where archaeological sites have been identified in zone U-53. A third example is in settlement zone U-32 near the Tok River where an archeological district has been extensively documented. For this important subject, the State planners have designated Settlement lands where heritage resources are known to occur and are likely to occur more widely. The proposed settlement lands include topographic and geographic features that possess high archaeological potential for the discovery of significant heritage resources. Clearly, the plan as currently proposed is contradictory over heritage resources.

Somewhere in the methodology of preparing plans, the State should be clear how they weigh the interests of different interest groups of Alaskan residents. Perhaps

the DNR planning team can provide a formula for how they weigh the interests of urban residents and rural residents in the decision-making process. Does the state planning process favor short-term, recreational use over traditional land users that span generations of Alaskans? The planning team has made it clear that some State residents who live permanently outside the Eastern Tanana Plan area have nominated lands for settlement so they can access the same subsistence resources in conflict with local residents. How will the state evaluate the impacts to food security (as practiced by local residents) posed by encroachment into traditional and customary hunting and gathering zones by non-local residents?

The noted economist Dr. Scott Goldsmith of the University of Anchorage has described some factors the State should consider in making decisions over demographic land-use changes such as those in the Eastern Tanana Area Plan. In his paper titled "Understanding Alaska's Remote Rural Economy" (UA Research Summary 10, January 2008, Institute of Social and Economic Research) he explores the significance and high value to the informal rural economies where unemployment is high and income is low. The proposed settlement lands in the Eastern Tanana Plan threaten the rural economy for the Upper Tanana region. These considerations should be integrated in the land planning decision-making process that requires interdisciplinary analysis.

In the November 12, 2014 audio conference between State planners and Native leaders of Tanacross and Northway, discussions emerged to plan a regional meeting in Tanacross among the Tribal governments, village for-profit corporations, and TCC officials to discuss the substantive issues posed with the Plan. This prospective meeting would include officials from the communities of Dot Lake and Tetlin, both of which are in the planning area. We understand that a meeting was held in Tetlin, but no public meeting has been held in Dot Lake. TCC can assist in organizing such a meeting among potentially affected village residents in the near future.

Should you have further questions or concerns, please call Paul Mayo, Director of Natural and Cultural Resources, at 907-452-8251, ext 3261, or Bob Sattler, Senior Archaeologist/Environmental Quality Analyst at 907-452-8251, ext. 3343.

Sincerely

Attachment: Comment from Roy & Avis Sam

Comment 128 of 141 - submitted on 11/14/2014 at 12:00 AM:

Thank you for the opportunity to comment on the draft update of the Eastern Interior portion of the Tanana Basin Area Plan, (TBAP). The Alaska Outdoor Access Alliance (AOAA) is a statewide organization dedicated to assuring public access to public resources on state lands is provided consistent with current state statutes. AOAA has concerns with the lack of additional motorized public access being considered in the draft TBAP under Management Guidelines for general public access (Chapter 2: Public Access). Particularly in light of the yet to be released Record of Decision (ROD) on the Eastern Interior Resource Management Plan (RMP) and EIS.

AOAA recommends that the state extend the public comment period for 45 days after the release of the ROD for the Eastern Interior RMP. Clearly from what we were commenting on as far as alternatives for the Eastern Interior RMP there will be a reduction in allowable motorized access to federal public land surrounding the

Eastern Interior RMP. Currently BLM is 3 months overdue from making public their ROD for the Eastern Interior RMP.

AOAA would like to reserve comments on the draft review of the Eastern Tanana Area Plan until after we are able to evaluate losses of access on Federal lands surrounding the planning area.

Futhermore, Under Capter 2, Section F. Limiting Access AOAA request the additional requirement that DNR must obtain public approval through local F&G advisory committees and local user groups before any state domain lands held in trust for general public are closed. Any trail closures due to safety or protection of property must be validated with evidence.

Sincerely

Comment 129 of 141 - submitted on 11/14/2014 at 12:00 AM:

I am writing to express support of the Northway Village Council's concerns regarding a proposed Department of Natural Resources (DNR) land sale in an area that is very important for subsistence for the community of Northway. A representative of Northway Natives, Inc. participated at a recent public meeting of the Eastern Interior Alaska Subsistence Regional Advisory Council held in Fairbanks on October 21-22, 2014, and brought to our attention that traditional subsistence hunting areas would be adversely impacted by land sales under the proposed Eastern Tanana Area Plan. The Eastern Interior Alaska Subsistence Regional Advisory Council (Council) is one of ten regional advisory councils formed under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and represents subsistence users along the Yukon River and its tributaries from Tanana to the Canadian Border. The Council provides a public forum for discussion and recommendations on any matter related to subsistence uses of fish and wildlife. The Council also is empowered to evaluate and make recommendations on management plans and other matters related to subsistence uses of fish and wildlife within the region.

The Council is concerned about impacts to subsistence resources, particularly moose and caribou, that rely on important habitat in the proposed DNR land sale area for feeding, calving, and migration. Many communities in rural Alaska are struggling to meet subsistence needs, and development impacts to or fragmentation of critical habitat adversely impacts local residents who rely on species that need intact habitat. Additionally, the Council recognizes and supports Northway in maintaining access to traditional hunting areas and trap lines the community relies upon within the proposed land use plan area.

The location of the proposed land sale area near Deadman Lake and Paradise is within an area that has long been established as a traditional, cultural, and subsistence use area of great importance for the community of Northway and not an area that should be considered for cabin sites or subdivisions. The Council supports the subsistence needs of the people of Northway in requesting these particular sites not be approved for settlement or sale, and that alternatives for locations with fewer impacts to subsistence be sought.

Thank you for your consideration.

Sincerely

Comment 130 of 141 - submitted on 11/14/2014 at 12:00 AM:

My comments are in regard to the land disposals around the Northway area & road system, specifically the Paradise area and Deadman Lake area. These lands are in high critical habitat for wildlife and local access to hunting areas & traplines. Northway Village Council has express huge concerns about the proposed DNR land sale in an area that is very important not only to the community of Northway, but other communities around the area both for subsistence & personal use hunting, trapping, & gathering.

People living along, and near roads systems are being very heavily impacted by increasing numbers of hunters and recreational activities which is forcing long standing traditional practices to change, and which is threatening a long standing use of the land and wildlife resources, crucial to a way of life in rural Alaska.

This land selection has Potential for very serious negative impact to local moose populations and even greater negative impacts to the 40 mile Caribou herd, which the local Fish & Game Advisory Committees around northeastern Alaska have invested and dedicated great efforts to rebuild and restore the herd. This effort will be severely threatened by the opening of this land sale. These areas are extremely poor choices for land sales.

The potential of limiting access to the public where land turns into private property is not good for Alaska or is it good for wildlife habitat in prime areas of habitat.

Remote parcel sales within Alaska should be selected base upon the least impact to established nearby communities and not base on ease of access to such parcels. Past homesteading acts/ sale were selected in very remote settings, and participant bore the brunt of access issues. It was not a requirement of the State to provide for easy access to these parcels.

Thank you for considering my comments.

Comment 131 of 141 - submitted on 11/14/2014 at 12:00 AM:

To whom it may concern, I came to Delta jct. 1968. I live within 20 mile's of Craig lake and there are few places left where I can hunt and fish without shooting or trespassing on private land so I would like to see this land left to recreation.

To whom it may concern, I came to Delta jct. Alaska in 1968. I live within 20 mile's of Craig lake and there are few places left where I can hunt and fish without being on private land. Please leave Craig lake as it is.

Comment 132 of 141 - submitted on 11/14/2014 at 12:00 AM:

Since this ETAP is likely to be the guiding document for the next twenty years or longer, please allow for the use of rivers and creeks as a renewable source of energy. Turbines generating electricity under low-flow, low-head conditions will someday be economically viable.

Even our 'Wild and Scenic' rivers and prime recreational streams like Clearwater Creek should be made readily available for use without onerous regulations.

Thanks for the opportunity to comment.

Comment 133 of 141 - submitted on 11/14/2014 at 12:00 AM:

Please leave this area zoned as recreation. It is a beautiful location that can be visited without letting it be filled up by settlements. My Dad homesteaded in Alaska in 1949 and we have enjoyed the wild country around this area ourselves for about 25 years. I and my wife lived in Big D for about 5 years and enjoyed the beauty and remoteness when we walked the Craig Lake area last summer.
thanks

Comment 134 of 141 - submitted on 11/14/2014 at 12:00 AM:

Freegold Ventures Limited, through its subsidiaries Freegold Ventures Limited, USA and Freegold Recovery Inc. USA, owns, operates, and is exploring with the aim to further develop the Golden Summit Mineral Project situated in the following sections near Cleary Summit, just north of the Fort Knox Mine:

T. 3 North, R. 1 East, FM: Secs. 24-26 and 35-36

T. 3 North, R. 2 East, FM: Sees. 14-36.

We offer the following comments and suggestions regarding the Public Review Draft of the Eastern Tanana Area Plan:

1. Management Unit F-144 (including F-144-01):

In the second paragraph of the "Management Intent" section for F-144, DNR states as follows:

It is intended that this area [F -144 (not including the DOT material site)] will be managed for its mineral value and that authorizations are not to be issued that would be inconsistent with the management intent of this unit.

But then in the fourth paragraph of the "Management Intent" section for F-144, DNR states as follows:

DNR may authorize the continued use of existing structures within the Cleary Summit Subdivision area (F-144-01) up to 15 years from the adoption of this plan in recognition of the presence of existing structures and to amortize the value of these uses.

In order to harmonize the fourth paragraph with the management intent expressed in the second paragraph, we suggest that the fourth paragraph be revised to read as follows:

DNR may authorize the continued use of existing structures within the Cleary Summit Subdivision area (F-144-01) until April 15, 2019, and then, if a multi-year plan of operations covering such lands has not yet been submitted under 11 AAC 86.800, DNR may authorize the continued use of such structures on an annual basis for up to an additional 10 years, (following text in was crossed out: 15 years from the adoption of this plan) in recognition of the presence of existing structures and to amortize the value of these uses.

We believe that this change reflects the intent to manage this unit for mineral value and is consistent with the determination that "lease renewal for a limited term of 5 years is in the best [interest] of the state." See Resources and Uses for F-144, at p. 3.63 of the ETAP Public Review Draft.

In addition, this change will prevent the owners of existing structures from being misled regarding the nature and scope of their present or possible future rights. The lands within F-144-01 are subject to existing state mining locations. Because these mining locations were initiated before any formal conveyance and accompanying mineral reservation under AS 38.05.125,

(a) any future conveyance of the surface estate in the lands within F-144-01 must be made expressly subject to both the mineral reservation required under AS 38.05.125 and the valid existing rights held by virtue of prior claims, and

(b) any investment by any surface grantee in future surface improvements would not be protected under AS 38.05.130 from the exercise of the valid existing rights held by virtue of prior claims.

To acknowledge these valid existing rights, we suggest that the fifth paragraph of the "Management Intent" section for F-144 be revised by adding the following new sentence immediately following the existing third sentence [i.e., the sentence that ends with the words "is to be evaluated in the written decision"]:

Any formal conveyance will contain the mineral reservation required under AS 38.05.125 and will expressly recognize prior valid state mining locations as valid existing rights.

2. Management Unit F-28:

According to the Map 3-2 of the draft plan, it appears that lands in Sec. 16, T. 3 North, R. 2 East, FM, are proposed to be included in Management Unit F-28. Due to the complete coverage of the south half of Sec. 16 (as well as the southern portions of adjoining Secs. 15 and 17) with state mining claims that are part of the Golden Summit project, the lands in the south half of Sec. 16 should be included in Management Unit F-16 (the same designation given to most of the lands to the immediate north and east) rather than Management Unit F-28.

Thank you for the opportunity to submit these comments.

Sincerely

Comment 135 of 141 - submitted on 11/14/2014 at 12:00 AM:

I am the Department of Defense (DoD) Regional Environmental Coordinator for the states within EPA Region 10 and represent the military interests of the Services and installations within those states, including Alaska. I am also responsible for coordinating responses to various environmental policies and regulatory matters of interest. The DoD appreciates the opportunity to provide comments for your consideration on the proposed Eastern Tanana Area Plan.

DoD and Alaska have a long and proud history of cooperation. The military installations and training range areas within the state are crucial to DoD's worldwide mission. Alaska offers vital capabilities for sustainable military readiness training for our outstanding service members. The military continues to be one of the largest sectors of the state's diverse economy. The military presence in Alaska includes over 33,000 active duty military, Reserve, National Guard, and civilian employees, with expenditures close to \$4.9 billion. Alaska's military installations are confronted with numerous challenges. Our installations, inland and offshore training areas, airspace,

and frequency spectrum requirements - essential components to our missions face compatible-use and other environmental challenges.

We have outlined some specific comments in the attached comment pages for your consideration. The DoD remains committed to working with the State of Alaska and the Department of Natural Resources in efforts to plan for a joint future. Thank you again for this opportunity to comment on the Eastern Tanana Area Plan. Please let us now if you have any questions or would like to discuss our comments in more detail. I can be reached at (415) 977- 8846 or by email at robert.shirley.2@us.af.mil.

Sincerely

General Comment: Request that the ETAP add text to recognize that military lands and airspace within and above the ETAP planning area are essential to the missions of a large number of military units, and that the economic activity generated by those units and their host installations significantly benefits the State. A core mission of the Joint Base Elmendorf-Richardson (JBER) 673d Air Base Wing, Ft. Wainwright, Ft. Greely, and Eielson AFB is to support the ability of military units to conduct their missions; the land and air training areas within the ETAP planning area are critical facilities that enable Air Force, Army and other mission partners to conduct necessary training. Military lands support one of the largest economic drivers in Alaska.

Specific Comments:

1. Section: Chapter 2, page 2-34

Comment: Please provide more clarification; beginning on page 2-34, goal #3: "Provide access to and within developing areas within the region, including bridge crossings of major rivers, consistent with federal/state design and environmental requirements." Is it the State's intention to build additional bridges on state selected withdrawn land? Will the state be responsible for all applicable environmental documentation and compliance with U.S. Coast Guard requirements for bridges over navigable waters of the United States?

2. Section: Chapter 3, page 3-2 lines 9-11

Comment: The statement "The state exercises ANILCA 906(k) authority over the area of federal land affected by state selections, which requires that DNR concurrence for actions that occur on federal land selected by the state" should have specific language to clarify ANILCA applicability to federal land. This "concurrence statement" in ANILCA is limited in two ways. First, it is limited to actions taken by the Secretary of the Interior. Second, the action by the Secretary of the Interior must be one to "make contracts [or] grant leases, licenses, permits, rights-of-way, or easements."

Recommendations: Replace the sentence with: "The state exercises ANILCA 906(k) authority over the area of federal land affected by state selections, which requires that DNR concur on certain actions by the Secretary of the Interior that occur on federal land selected by the state such as the granting of leases, licenses, permits, rights-of-way, or easements, or the making of contracts affecting such conveyances."

3. Section: Chapter 3, page 3-73

Comment: Page 3-73 describes the Donnelly Training Area as being part of Ft. Greely. BRAC 95 transferred 650,000 acres of training land from Ft. Greely to Ft. Wainwright. Correct text to reflect BRAC 95 transferred 650,000 acres of training land from Ft. Greely to Ft. Wainwright. Ft. Greely currently has approximately 7700 acres.

4. Sections: Chapter 3, Map 3-3, and page 3-101

Comment: Include the boundary of Gerstle River Test Site on Map 3-3 and update the description information for L-02 to include military restrictions and potential contamination.

Comment 136 of 141 - submitted on 11/14/2014 at 12:03 AM:

Very few places in Fairbanks offer the majestic views of the White Mountains that we are lucky to have from our home at 1906 Ridge Run Rd on Cleary Summit. My good friend Logan Ricketts' parents had obtained this property back in 1973, back in the heyday of the old Cleary Summit Ski Area. His parents were ski patrols here and Logan practically grew up on this hill. In 1998, Logan and I started to build our log house. Both of us had our respective jobs, so we'd come up after work on weekdays, and spend all day on weekends to build. When we finally enclosed the building in December 2000, I figured we can now heat the building so I moved up here and have been living here ever since. Logan followed a few years later.

The great views to the north means great northern lights viewing. Eventually we started a B&B, and though not large, we have had many guests from around the world stay with us and visit us for this natural phenomenon, something that is very unique to this area. There are only a few places that are considered to be a northern lights destination. The Scandanavian nations of Norway, Finland & Sweden, Iceland, Yellowknife (Canada), and Fairbanks, Alaska. And within Fairbanks, the Cleary Summit area is well noted as one of the best spots for aurora viewing for not only its vistas, but for its relative ease of access from the city center.

I realize that mining is a big factor in ETAP, and I realize the importance of the mining industry in Alaska. However, the tourism industry is a growing and renewable industry, and the tremendous growth of winter visitation in the last 12 years to Alaska, and especially Fairbanks, can be directly attributed to the draw of the Aurora Borealis.

Today, Logan, my wife Akiko and our two children continue to live here and host our aurora viewing visitors. Logan, however, was diagnosed with ALS in 2007, and though it would be much easier to live in town, his love for Cleary Summit will keep him here as long as possible, and we would like to help him do that.

Thank you for allowing me to convey how much we love living here, but also being able to contribute to the growing Fairbanks tourism industry. Please feel free to contact me with any questions.

Sincerely, Makoto "Mok" Kumagai

Comment 137 of 141 - submitted on 11/14/2014 at 11:54 AM:

Tanacross Incorporated P.O. Box 76029 Tanacross, AK 99776 (907) 883-4130, Fax (907) 883-4129
November 13, 2014

Commissioner Joe Balash Alaska Dept. of Natural Resources 550 West 7th Ave. Suite 1400 Anchorage, AK 99501-3579

Subject: Comments on the Public Review Draft of the Eastern Tanana Area Plan (ETAP)

Dear Commissioner Balash,

I am the President of Tanacross, Inc., the village corporation formed under the Alaska Native Claims Settlement Act for the Native Village of Tanacross, which includes people from Mansfield, Kechumstuk, Healy Land, and Joseph Village . Anthropologists have documented parts of the territory used by our people and that, as Native place names indicate, we have occupied this country for thousands of years. In seasonal migrations and trade, our people used the land from Delta to Canada and from the Arctic Circle to the Copper River Basin.

Our People and other Native people hunted, fished, and gathered subsistence resources over all the lands included in Upper Tanana Region. This is and has been Indian country since time immemorial. Tanacross, Inc. supports the State s efforts to plan for and inform the public about its management intent for State lands in the Upper Tanana, but reminds planners and resource managers that the original people still live here, are State residents, and deserve to be served by the State planning process, not simply negatively impacted. There is little in this plan to actually improve the lives of the people in the Upper Tanana. It appears that the goals of the plan are to further programs designed to satisfy policy makers who do not live here. Where are the State s plans and programs to create jobs, contracts, and an economic base for the Upper Tanana?

The Upper Tanana, and Tok in particular, is experiencing a severe economic downturn due to systemic change in the tourism industry and closure of the US Coast Guard Loran Station. Specifically, tour busses no longer ply the Alaska Highway between Dawson City and Fairbanks, with overnight lodging in Tok. According to a letter to the Regulatory Commission of Alaska from John Rusyniak, President of the Tok Chamber of Commerce, one third of local businesses (15 of 45) have closed. Also according to Mr. Rusyniak, 200 residents have left Tok, leaving their homes boarded up and vacant. Many families have moved to Fairbanks or Anchorage to search for work. Making more land available for settlement or commercial use, of itself, does not create jobs, contracts, or opportunities for economic growth.

The sheer size of the settlement units set out in the draft ETAP is of great concern to Tanacross residents and Tanacross Inc. shareholders. For example Unit-22 which includes the area known locally as the Tok Triangle contains over 40 square miles of land. It is hard to imagine the scenario in which that much land should be developed for settlement. All of the improved land which currently makes up Tok does not exceed three square miles. While development of some commercial and subdivision land within Unit-22 may be appropriate over the 15-20 year life of the area plan, the land use designation of settlement for the entire area will be disruptive to the

local economy.

A forestry/habitat designation for some of the proposed Unit 22 lands would better support local jobs and contracts from commercial firewood harvest and sales, and the harvest of biofuels. The continued use of these lands for subsistence will also help support local families so they may remain in the area even during downturns in the cash economy. Tanacross residents in particular are resilient and reliant on subsistence resources, including firewood, game animals, wild birds, and fish to survive as they have done historically in difficult times. Many of the settlement areas proposed in the ETAP, particularly U-09, U-10, U-22, U-53, and U-58, are close to village communities and are used by those communities for subsistence hunting and gathering. The negative impact of the ETAP on these present and ongoing activities should be considered and provided for in reaching a final document.

Historically, the Tok Triangle was the location of massive migrations of caribou between the Copper River drainage and the Tanana River area. This migration continued into more recent times, gradually diminishing because wildfire was overly managed to allow the growth of thick stands of black spruce. Reducing the spruce forest through biofuel harvest will reopen the area to traditional wildlife migration patterns. Allowing land sales in the Tok Triangle for recreational cabins will lead to conflict with wildlife resources, especially with grizzly bears at the base of the mountains.

The Division of Forestry in Tok has had the foresight to begin managing fuels in the Tok and Tanacross areas. One tool has been thinning and limbing trees to discourage the spread of extensive crown fires. Many fires in the Tok and Tanacross areas are caused by people improperly burning or extinguishing campfires. The addition of cabins or remote homes in the Tok and Tanacross areas will increase the likelihood of wildfire, and will also create a larger land base that needs protection. Both will increase the cost of firefighting for state and federal governments, a factor that may not have been but should be taken into consideration in the ETAP.

Tok and Tanacross have been in the forefront of using renewable energy for both heating and generating electricity. Similar to the value of material resources, which is tied to haul distance between the pit and the point of use, the economic viability of biofuels energy projects depend on the proximity of reliable sources of biofuels. The Tok Triangle includes state lands that are the closest to the Tok School and its biofuels energy project.

The draft plan also fails to include adequate information about what type of settlement development is intended and how it might be dispersed: Large scale commercial, small lot subdivision, or remote cabin sites? Some of these concerns might be alleviated if more information about the intent of the State were clarified. Subdivisions in a smaller Unit- 22 should be laid out and sized to mitigate these concerns as much as possible with the advice of local tribes, Tok Forestry, and the Alaska Department of Fish and Game. An overall smaller Unit 22 will communicate a clearer direction of land management for local residents, land developers and forest and wildlife managers. Mixed land use throughout a large unit will inherently create less utility, lower values, and conflict amongst land managers and user groups.

Specific Comments on Unit Designations:

Page 3-116 U-12 Forestry-Habitat: These are state lands that abut large tracts of Tanacross Inc. and Native allotment land near Mansfield, and Galman Lakes. The description of this unit refers to it as being west of Tok. The reference should be to Tanacross. It is more accurate and pertinent to state that it is north and west of Tanacross. Management intent is to allow utilities, communication facilities, roads, and similar types of projects. Since this unit is generally north of the Tanana River and is an important hunting area for Tanacross people, any road development should be limited to temporary forest access roads to deter trespass and damage to important subsistence habitat and cultural resources.

Map 3-4a U-12 Forestry-Habitat Map 3-4a depicts a block of land immediately north and east of Tanacross (T 9 N, R 11 E, CRM) as state land with a forestry-habitat designation. This block is mostly Tanacross Inc. (IC 296) and certificated Native allotment land. This appears to be a mapping error that should be corrected. Virtually no state owned land lies within the one by three mile block.

Page 3-118 U-18 Settlement-Commercial The inclusion of this land in the ETAP (Map 3-4a) appears to be a mapping error. The tract appears to be made up of the Warbelow Subdivision and a patented Native allotment (Lot 2 of USS 6881) immediately west of the Warbelow Subdivision in Tanacross. If the state should acquire this land, the forestry-Habitat land use designation is better suited for this location. The ETAP may be referring to the U-19 state TA lands described below which are located nearby.

Page 3-119 U-19 Settlement-Commercial: Unit-19 as depicted on the area plan (Map 3-4a) contains many acres of Tanacross Inc. land that are in and next to Tanacross. It appears that Map 3-4a's depiction of state land at this location is a mapping error. The only state land available for inclusion in the plan in this area are two parcels of state tentatively approved land (Lot 3 of USS 11293 and USS 11552) which are subject to Native allotment applications. While these two parcels appear to be small lots on the 1:150,000 map scale (Map 3-4a) they contain a total of 160 acres. The impacts of disposals of this much settlement and commercial land in the Native village of Tanacross could be quite disruptive for Tanacross residents and the shareholders of Tanacross Inc. If these lands should become state lands the forestry-habitat land use designation would be more compatible with the culture and economy of the village and would better serve Tanacross and the state over the long term.

Page 3-120 U-22 Settlement: This unit is in several separate parcels within and surrounding greater Tok including the Tok Triangle. In addition to the above comments on Unit-22 it may be wise to allow for the acquisition of land for public facilities and use by the community of Tok. Tok is not a Native village recognized by the Alaska Native Claims Settlement Act (ANCSA), therefore an ANCSA land base does not exist from which it can nominate and acquire land from a local village corporation under Section 14(c)(3) of the act. By allowing for the possible acquisition of state land, Tok as an unincorporated community or as a municipality (which it may one day become) can better serve its residents including the expanded service demand that will be created by the offering of Unit-22 state land disposals.

Page 3-120 U-22 Settlement The settlement designation of U-22 includes a nine mile long corridor west of Tok along the Alaska Highway. The initial seven miles of

this is a mix of developed and undeveloped private and state owned land. The greatest concentration of the developed lands is along the highway frontage. With the weak economy in the area there currently is an abundance of developed and undeveloped private land along both the Tok Cut Off and Alaska Highways. The undeveloped westernmost two miles of corridor should be changed to be a forestry-habitat land use designation to avoid further extension of strip development. This designation would match the adjacent Unit 21 block and would reinforce future development back from the highway frontage on the seven miles of existing private land and proposed U-22 settlement designated state land. To preserve the natural character of the landscape a 200 foot non-development buffer from the Alaska Highway should be set out for the westernmost two mile portion of Unit 22 which we are proposing become Unit 21 forestry-habitat designated land.

Page 3-122 U-29 Settlement/Commercial: The scale of mapping for the Tok Cutoff and Alaska Highway intersection as well as the corridor west of this intersection along the Alaska Highway including Tanacross makes it difficult to adequately review U-18, U-19, U-22 and U-29 land use designations. The lack of scale will also make it difficult for resource managers to understand the intent of the plan. A map detail, inset or a separate map sheet with imagery and a satisfactory scale is needed for meaningful review and comment. If Unit-29 includes the state land near the Wadsworth s property it should be noted that a major environmental cleanup effort is needed.

Page 3-122 U-32 Settlement Unit 32 as depicted on Map 3-4a includes many acres of Tanacross Inc. land. These are lands that Tanacross Inc. acquired with patent 50-91-0425 and IC 1508. They surround the Tok River State Recreation Area (TRSRA) and the Tok cemetery. The depiction of these lands as state land on Map 3-4a appears to be a mapping error. According to DNR s Alaska Mapper few acres of state owned land exists in this western portion of Unit-32 (T18N, R13E CRM). East of this area is the closed US Coast Guard Loran C facility. If this site is intended to be included in Unit-32, a disposal of it to a governmental unit or non-profit such as the Wildfire Academy, University of Alaska or Tanana Chiefs Conference could possibly accommodate a training or educational program. This new development could make use of the buildings and infrastructure on the site and could create much-needed jobs and provide re-training services to out-of-work job seekers.

Page 3-129 U-53 Settlement: This area is east of the Alaska Highway. The 1985 classification of wildlife habitat had it right and should be retained. This is an important hunting area for the Native Village of Northway and for other Upper Tanana subsistence users. While scenic, its wildlife and habitat values outweigh its suitability for recreational cabins.

Page 3-131 U-58 Settlement: This unit is adjacent to the Tetlin National Wildlife Refuge and traversed by the Paradise Hill Cabin Trail. The 1985 classification of wildlife habitat and Forestry should be retained. The area is used for hunting by Alaskans as far away as Fairbanks and Anchorage. This area is especially important to the Native Village of Northway, a community that has an 85% unemployment rate. The state of Alaska has an obligation to protect and enhance subsistence resources for residents. There is no demand for settlement land this far from sources of employment or contract work. Page 3-133 U-64 Forestry: This hillside was identified by DGGS as a slow, continuous land slide. The flat wetland was also

identified as a unique groundwater/Tanana River recharge area. The planners should consult with Trent Hubbard for more information. DOF should be discouraged from disturbing vegetation through logging in consideration of the instability and unique geotechnical aspects of the area.

Comments on Public Access Management Guidelines:

Page 2-34 D. Management of ANCSA 17(b) Easements: While it is not likely many new 17(b) easements will be created, some additional language here may be helpful in clarifying the state's role in using newly identified 17(b) easements to access state land. The suggested language is as follows; The state will incorporate identify any new 17(b) easements to access state land as needed because of new areas proposed for Interim Conveyance required and will ensure that public access is maintained to existing 17(b) easements.

Page 2-35 E. Access for Development: This paragraph should be updated to include language that protects cultural resources. The third sentence of paragraph E should read as follows; If the new route or facility will not or should not provide public access due to concerns for public safety or the long term detrimental impact on cultural or natural resources, the current means of public access should be retained the new route or facility should be closed.

Page 2-35 F. Limiting Access We recommend that the following language be added to help reduce the risk of access related fires. Public access may be limited because of the presence of dangerous fire conditions, fire management operations, timber harvest, &

Comments on Cultural Resources in Settlement Designated Units:

The Upper Tanana Area people's use of land and resources was and continues to be widespread. This use has not been limited to ANCSA village corporation selection areas as evidenced in part by the numerous Native place names in the area (University of Alaska, Alaska Native Language Archive). Use and occupancy is documented by the 1946 work of then social scientist Dr. Walter Goldschmidt and attorney Theodore Haas working for the Office of Indian Affairs. State land disposals as proposed by the settlement designations in the ETAP present some risks to cultural sites and resources. The long term clearing and improvement of land, increased access by the public, and the eventual land disposal itself could cause sites to be damaged or lost altogether. The large size of some of the settlement designated units as set out in the draft ETAP further increases the chances that cultural areas will be included in a land use that attracts more attention or is inadvertently destroyed. Understandably so, the ETAP resource allocation table's management intent calls for the protection of cultural resources for many of the settlement designated units. This management intent language should be extended to management intent and resources and uses guidelines for settlement Units 9, 10, 18, 19 and 63 in the ETAP's resource allocation table.

Sincerely,

/Robert L. Brean/

Robert L. Brean Tanacross, Inc.

Note- This filing has also been sent by e-mail to DNR ETAP planning staff, Brandon McCutcheon and Mark Henspeter, since some of this letter's original formatting is lost with this public comment system.

Comment 138 of 141 - submitted on 11/14/2014 at 02:41 PM:

In the northeastern portion of the Delta region, north of Healy Lake, Doyon was conveyed 7 blocks of land ranging from 9 sections to 2 townships in size. Preferred ground access to 5 of the Doyon land blocks is through DNR land. The three northeasterly most Doyon land blocks of this group contain 7 mineral prospects as identified in the USGS Alaska Resource Data Files. Two these Doyon Land blocks, known as to Doyon as Carrie Creek and Jackie contain highly regarded gold prospects that have been the subjects of several mineral exploration programs in recent years. Much of the ETAP designation in this area appears to be mining/habitat and a block of habitat that is adjacent to Doyon land on presumably preferred access. Please be mindfully of unit designations that may limited ground access to isolated blocks of Doyon land within the ETAP Delta Region.

Comment 139 of 141 - submitted on 11/14/2014 at 03:28 PM:

I strongly object to the proposed land disposal and development in the areas of Paradise Hill/Sweetwater creek and Deadman Lake. These areas are established trap lines of more than 40 years, and are still in use as such. It is also used by many locals for subsistence hunting, berry picking, root and bark gathering. There are very few places where most local people can get to for their trapping and hunting, and certainly not an over abundance of wildlife to trap and hunt. These are very important for our local population.

Comment 140 of 141 - submitted on 11/14/2014 at 04:05 PM:

Thank you for the opportunity to provide agency comments on the Draft Eastern Tanana Area Plan (ETAP). The National Park Service (NPS) wishes to provide comments for the following NPS units: 1. Yukon-Charley Rivers National Preserve is adjacent to parts of the Fairbanks and Delta Regions. 2. Wrangell-St. Elias National Park and Preserve is adjacent to a part of the Upper Tanana Region. As the Draft ETAP focuses on management of general domain State lands, the NPS supports Legislatively Designated Areas, and other State domain lands with land use classifications of Wildlife Habitat Land, Public Recreation-Dispersed, open space, riparian buffers, and Heritage Resources in areas adjacent to NPS units.

Please direct questions or comments to Dick Anderson at 907-644-3536, richard_l_anderson@nps.gov or to Jobe Chakuchin at 907-455-0629, jobe_chakuchin@nps.gov.

Sincerely,

/s/

Joan B. Darnell Manager Environmental Planning and Compliance

Comment 141 of 141 - submitted on 11/14/2014 at 04:27 PM:

I would like to submit a comment opposing the Eastern Tanana Area Plan's leasehold locations in Northway. I have been a part of the Northway community on and off for years. Half of my family resides in Northway today. Northway is a traditional Upper Tanana community that continues to practice subsistence and traditional use of

lands. I am very concerned about the detrimental results leasing the land will bring to the community. The reasons I disagree with land leasing here include: 1) The areas are traditionally used to their maximized benefits. The lands serve a majority of our community. Our Athabascan culture requires that we respect the land and animals so although Northway depends very much on this area, they make sure not to use it so too much. So Northway is careful not to over hunt moose and caribou which are some of the village's main food sources. Leasing cabin sites & recreational lots would force the Northway community to completely relocate or disperse onto limited land options and allow people NOT from Northway who are interested in these areas to have semi-permanent ownership in the most productive hunting grounds for our people. We know that these people who will not be from Northway will hunt what they can and won't be considering Northway and the future for our youth as they hunt. 2) The impact on the caribou and moose is another major issue here. Setting up locations on the highway where hunters can load up and drive to easily whether it is for the day or in the long-term, right on a caribou and waterfowl route is a scary concept. Our moose population is at an equally high risk. There have been a few people from outside places of our community from Anchorage who have come in and shot far too many moose and it did affect the whole area and changed the symbiotic relationship the community had with the land. The state does not have a way to appropriately deal with this over use. As Anchorage and Fairbanks continue to grow, the Anchorage and Fairbanks hunters will have to find new areas to hunt because the areas closest to them are used up so they will move closer to and within Northway. But to them, this is a fun Alaskan experience, and to Northway, this is how they feed their families. There is a tremendous difference. There is no advantage to or profit to be made in leasing lands here. Thank you