

Hatcher Pass Management Plan
Public Review Draft
Issue Response Summary
November 2010

(See Approved Revisions document for a summary of plan changes)

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		GENERAL COMMENTS	
Lack of Objective Data	There is a lack of objective data and facts to support the recommendations and management intent stated in the draft plan.	The plan provides adequate background information and objective data to support its conclusions. Each resource or use described in Chapter 2 is preceded by background information of a factual nature. Similarly, such information is provided for each management unit in Chapter 3.	No change.
Internal Plan Consistency	The plan has numerous internal conflicts and inconsistencies.	Our review of the plan does not indicate the presence of internal conflicts and inconsistencies. Review of our response will indicate that the issues that are identified are not substantial (like wording or semantic issues), that the issues are addressed in a different part of the plan than that that cited, or, in our opinion, are incorrect and unsubstantiated conclusions and assertions.	No change.
Recreation Use Levels and Recreation Carrying Capacity	There is no discussion of the level of recreational use by type or recreational carrying capacity.	<p>The plan provides detailed discussions of recreational use, including the various types of recreational users. This occurs in the Recreation section of Chapter 2 and each management unit in Chapter 3. See these sections and, specifically, maps 1-2, 2-2, and 2-5. However, we agree to revise the plan to include numeric information on recreation use.</p> <p>The plan did not include a recreational carrying capacity analysis because of the inherent difficulty in reaching agreement on desired recreational use levels and the inability of DNR to impose the types of restrictions that would be required if such an analysis were to occur. Carrying capacity analyses are often conducted by federal agencies, which have differing authorities for land management. A detailed discussion of this issue occurs in the recreation portion of Chapter 2 under 'Topical Issues'.</p>	Numeric data on recreation will be included with the Issue Response Summary as an attachment, which will also be a table within the final plan in Chapter 2.
Effectiveness of current management approach not discussed.	The effectiveness of the current management scheme in the Hatcher Pass planning area is not discussed in detail in the plan and it should be.	The plan provides a discussion of the current management scheme in the Hatcher Pass Area. The general nature of land management and management authorities are discussed at length on pp. 1-11, and 1-14 through 1-19 of Chapter 1. Additional detail is provided in Chapter 2 under Generally Allowed Uses (p. 2-2) and 'Uses Requiring Authorization Within the Hatcher Pass Area' (p. 2-3). The revised management direction is also described in the section 'Central Management Direction: Recreation' in Chapter 2 (pp. 2-1 and 2-2. Other parts of the plan identify aspects of the current	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		problems in enforcement and management. An adequate analysis of current (and proposed) management effectiveness exists.	
Lack of enforcement and no identification of agency responsibilities.	There has been a lack of enforcement and responsibility on the part of the managing agencies to date.	The plan acknowledges that there have been problems with enforcement, and these are related to inadequate staffing for enforcement functions or to insufficient enforcement authority. In areas where the management agreement between DPOR and DMLW applies, sufficient authority exists to effectively manage the Hatcher Pass, given sufficient staffing. However, in areas where this agreement does not apply and the area is administered by DMLW, this division is hampered by the lack of enforcement capability. This issue cannot be remedied by this plan, however.	No change.
Issue of enforcement not addressed.	The draft plan notes that existing guidelines, management intent, and regulations are not being followed, but ignores the issue of enforcement in the Public Review Draft.	<p>The plan does not state that existing guidelines and management intent are not being followed. Nor does it make the plain statement that the regulations are inadequate. Rather, it states that there are instances where the regulations are not followed, but does not come to any general conclusion on the adequacy of the current enforcement procedures.</p> <p>The plan does not ignore the problems of enforcement. Very specific recommendations are made to correct the current problems of the existing regulations. Discussions of this occur throughout the plan but are dealt with in Chapter 1 (p. 1-22) and at length in Chapter 2 (pp. 2-23 through 31) and Chapter 4 (p. 4-2).</p> <p>It is inappropriate for management plans at this scale to deal with operational issues at a detailed level. Operational analyses occur at a more detailed level and through separate management agreements. Nonetheless, the plan describes the current management agreements (4-2) and recommends that these be revised to conform to the recommendations of this plan (p. 4-2 and 4-2). Aspects of enforcement will be dealt with in the revision of the management agreements.</p>	No change.
Failing of General DNR Policies	The plan does not address the failings of existing DNR policies or make any recommendations for resolving the policies	An evaluation of the 'failings of existing DNR policies' is inappropriate in a management plan. Many of the concerns that are raised are problems that exist at a statewide level and require a more comprehensive statewide review, if one is warranted. Similarly, it is inappropriate to include recommendations for resolving these 'failures' in a management plan that deals with a specific part of the state.	No change.
Insufficient justification for capital projects.	The plan lacks sufficient justification for capital projects, does not include a list of the proposed projects and	All recommendations for capital projects are subject to funding and availability, which would be disbursed by the state legislature. A ranking system is not possible. The priority of these projects is	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	does not prioritize them.	<p>dependent upon the decisions made during the operational management of the area, often require legislative approval, or are related to specific funding sources that are beyond the ability of this plan to influence.</p> <p>A listing of specific projects is included by each management unit and the road system, and a complete list of projects can be found in Chapter 4, beginning on page 4-12. Justification for these projects can be found in each of the management units and, more generally, in Chapter 4, p. 4-7.</p>	
Management intent lacks standards.	Throughout the plan, management intent is provided that lacks any standards and criteria for decision making, causing such decisions to be challenged on the grounds that they are arbitrary and capricious.	<p>The term ‘management intent’ is confused with the term ‘management guidelines’.</p> <p>Management intent, as it is used in DNR plans, refers to the general management direction of state lands and resources in a given spatial area. It is like a goal in that it provides an indication of what is to be attained. It is not a guideline, which often contains standards and criteria for decision making, and it is not intended to provide standards or criteria for decision making. Management <i>guidelines perform that function</i>. A detailed discussion of these terms is found on pp. 3-8 and 3-9.</p> <p>Review of the management guidelines used in the plan indicates that criteria and standards are identified where needed. Guidelines are discussed at length in Chapter 2, beginning on page 2-8 and are reflected in each following sub-section of that chapter. Guidelines are also provided for each management unit in Chapter 3. Specific guideline related to ‘Utility Lines, Communication, and Related Facilities’ can be found on page 2-39, beginning on line 23</p>	No change.
Public Participation Process	There is a lack of information about the planning process, especially public meetings and public comments. This information should be included in the plan.	<p>The DNR website for this plan maintains a list of meetings and meeting summaries. It also contains all of the public comments that have been received and it describes the planning process that has been used to develop this plan. This site explains that there have been 15 focus group and 4 public meetings which nearly 450 people attended. In addition, 548 written public comments and questionnaires were received prior to the release of the PRD (March 1, 2010) and approximately 1,400 thereafter.</p> <p>We agree that a summary of the planning process, especially that part related to public participation, should be included in the final plan.</p>	More detailed information related to the public process and public comments will be included in the final plan. A section regarding the public process and a table with information about the number of meetings, number of attendees, and comments received will be included. This information is also attached to the Issue Response Summary in table format.
Development Standards	Plan does not provide any standards	It is not typical for management plans of this type to provide	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	for development of utility lines, roads, trails, corridors, parking lots, trailheads, or other structures. When standards are stated – they are often followed by “where practicable”. A management plan should provide development standards and management guidelines.	<p>detailed development, or design, standards. Most often, these standards exist at the state or federal level in standard design manuals, and are used for siting, design and development purposes. Such standards include those for trails, roads, and some utilities. There are also general design standards for parking lots and trailheads. It is not appropriate or necessary to duplicate these standards in a plan if they already exist in other documents, although they are often referenced in management plans. This approach is followed in this plan.</p> <p>There are some instances where design standards do not exist and in these instances the plan provides ‘management guidelines’. These are general design and siting requirements and guide DNR adjudicators in their written decisions. DNR relies upon its written decision process to determine the type of requirements to apply to a specific land use or project. This is simply a different approach to the development of stipulations and has the advantage of adapting the stipulations to the specific project.</p>	
Planning Process (General)	The entire planning process for the Hatcher Pass Management Plan should be re-done.	<p>The planning process used in the revision of this plan was appropriate and involved the public in a very significant way. It was similar to processes used in other DNR area and management plans and involved a rigorous identification of issues, review of land status and resource information, and the development of plan designations, management intent and management guidelines that relate to recreational use patterns and land management requirements.</p> <p>Starting all over again would not result in the identification of new issues or new information, and it would result in the loss of all the public effort put into this plan revision. None of the public responses (of which there are over 1,400) have called for starting all over. Equally important, it would delay the revision of our management policies for this area indefinitely.</p>	No change.
Hunting	The plan does not state where hunting is and is not allowed.	It is not the function of an area plan to identify where hunting can and cannot occur. Determinations of this type are made by ADFG.	No change.
Physical Attributes of Area	The physical attributes of the Hatcher Pass area were not addressed.	Chapter 2 provides a description of many of the resources within the planning area on a regional basis, and the physical attributes (as well as other characteristics) are described for each management unit in Chapter 3.	No change.
		BOUNDARIES	
Increase in the size of the planning area.	The addition of the two new areas to the management plan – consisting of	These areas were added at the request of the public and agencies on the grounds that recreation activity related to the Hatcher Pass	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	the High Glacier Peaks and Kashwitna River drainage, is inappropriate and will result in additional regulation of these areas.	area was occurring in each. Since the intent of the Hatcher Pass Management Plan is to provide a comprehensive strategy for land and resource management related to activities occurring in this area, the inclusion of these two areas is considered appropriate. Most of the public participating in the plan revision also thought that the inclusion of these two areas was appropriate.	
		CHAPTER 1: INTRODUCTION	
		LINE BY LINE ANALYSIS	
Page 1- 2 Line 31-32	No information is provided to substantiate recreation use increase. There is no mention of the plan amendment 15 years ago. There is no mention of the growth of the Matanuska-Susitna Borough's (MSB) population or the challenges caused by growth.	Although information about recreation is brief on page 1-2, In-depth information related to recreational use increase is provided in chapter 2, in the section related to Recreation, beginning on page 2-20. There is no mention of a plan amendment for Hatcher Pass being done 15 years ago because the Hatcher Pass Plan Amendment was done in 1989, 21 years ago. Information regarding the 1989 amendment can be found in the 'Planning History' section in Chapter 1 on pages 1-12-13. Statistical data regarding the population growth in the MSB and evaluation of the challenges faced by that growth is not included in this management plan because this is a DNR land management plan, not a population analysis of the Mat-Su Borough. However, it is well known that the increase of recreation in the Hatcher Pass area is due to the increase in population of the MSB and Anchorage. The effect of the increase of recreation in the area is discussed in the 'Summary of Issues' beginning on page 1-22 of the plan.	No change. No change. No change.
Page 1-11 Line 8-9	No mention of MSB lease in the Government Peak Area	The information from this lease was not included in this section because the information relates to "Land Ownership." The development lease is discussed in the Administrative-Regulatory Section of Chapter 4, on page 4-2, lines 15-23.	No change.
Page 1-11 Line 15-16	A better explanation of how land use plans can direct management of particular uses needs to be included, especially enforcement.	A discussion on how land use plans are structured to direct management toward particular uses can be found in Chapter 3, beginning on page 3-8, line 26 through page 3-9, line 5. The plan deals with several enforcement issues, including the revision of the current regulations that are used to close areas to certain types of motorized uses. This is stated a number of times throughout the plan and at length in Chapter 4, p. 4-2.	No change.
Page 1-11 Line 37-38	What is the purpose of the Willow Mountain CHA and how has	The purpose and goal of the Willow Mountain CHA is statutorily defined in AS 16.20.500. It was created to protect moose habitat.	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	recreational use increase affected it?	Increased off-trail recreational summer use has shifted moose populations slightly. ADFG manages this area.	
Page 1-13 Line 29	There is no boundary on a map or definition of the east-west side included in the plan.	Definitions of both the “east” and “west” sides of the plan are included in the plan. The definitions can be found on page 1-13 in Footnote 5. The boundary between the east and west side management units will be depicted on one of the plan maps for visual orientation.	The boundary is depicted on the Adopted Plan Map. This map is included with the Issue Response Summary as an attachment.
Page 1-13 Line 17-21	MSB conducted an EIS in the Government Peak Area. This is different than what is described in the plan.	Although both the EIS and development analysis were ordered in 2005, neither had been completed as of March 2010, when the Public Review Draft of this plan was released. Progress reports for studies of the Hatcher Pass area were not copied to DNR. The EIS was not provided to DNR until after May 5, 2010 when the comment period for the draft plan was closed. Nonetheless, the text will be revised to include “A Development Suitability Analysis”.	Revise text to include a “Development Suitability Analysis” and reference completion of the EIS.
Page 1-13 Line 33	Borough land ownership: the amount owned that is owned by the borough and the amount that is under the Development Lease is in error and needs to be corrected:	The plan text needs to be corrected to properly reference the acreage owned by the borough and the amount of land that is under the Development Lease.	This statement will be revised to state: “The Borough owns large portions (3,012 acres) of the Government Peak Management Unit. A development lease with DNR affects over 11,000 acres of land, most of it within the Government Peak unit, which allows the borough to expedite the development of public ski facilities.
Page 1-14 Line 21	What population growth is being cited? What recreation demands have increased?	The population growth being cited is for south-central Alaska, including the Mat-Su Borough and Anchorage municipality. Recreation demands by public have increased year-round in the Hatcher Pass area, especially in the winter, for both motorized and non-motorized recreationalists. This information was gleaned through public comments and focus-group workshop participation and observations made by DPOR during their daily management of much of the east side of the planning area.	No change. No change.
Page 1-15 Line 21	How does DNR determine when a popular pattern of recreational use has been established? Has this been done for HP and how did DNR establish and verify that these patterns existed?	DNR determines that a popular pattern of recreational use has been established by agency observation and through public input. The two are not mutually exclusive and serve to verify or disqualify each other. In Hatcher Pass, DPOR actively manages recreation on most of the east side. The rangers are very familiar with where people go and the types of activities that occur in their management area. The west side is managed by the SCRO and is a well known snow-	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>machining area. DPOR produced a map several years ago that depicts the numerous snowmachine trails on the west side. The MSB also has trails recorded and an ongoing development study in the Government Peak Unit, which further demonstrates the patterns of recreational use in the planning area.</p> <p>The public provided input through written comments, public testimony and recreational use questionnaires. Additionally, at the focus group work-shop meetings, the attendees were asked to show directly on maps what recreation they do, and where they do it, in addition to what other types of recreation they see occurring there.</p> <p>The observations made by DMLW, DPOR, MSB, and public input were all consistent. It is highly unlikely that all of the people who participated in this planning effort were wrong.</p>	
Page 1-15 Line 1-11	The description of 'Traditional Means of Access' is confusing and unclear to the public.	<p>The description in the plan mirrors the language of the legislation and uses many of the same terms. We are therefore reluctant to change the text since to do so might introduce inconsistency between plan text and statutory wording.</p> <p>However, line 11 needs to be revised to correctly describe DNR's authorities and it is appropriate to include an introductory statement.</p> <p>This section should read, beginning on line 1, "This section of statute constrains the authority of DNR to restrict traditional means of access for traditional outdoor activities for the purpose of protecting aesthetic values. It places restrictions of ..." Line 11 will be revised to " ... has been established if the intent is related to 'aesthetic' reasons, which are defined in statute as "those values that exist as an expression of the social or cultural viewpoint held by a portion of the population."</p>	The text will be revised (see response) and the statutory definitions of traditional means of access and traditional outdoor activities will be included in the glossary of the plan.
Page 1-15 Foot Note 7	If the land in Government Peak is not part of the Special Use Area then how is it non-motorized?	<p>DPOR used its 11 AAC 12 authorities to close Title 38 land in Government Peak to motorized uses on a year round basis.</p> <p>The Division of Parks and Outdoor Recreation exercises its general park authorities under 11 AAC 12, which allows them to manage, recreational motorized uses. DPOR can use its park authorities on Title 38 land (general state land) if there is a management agreement between DMLW and DPOR and if this agreement gives DPOR the authority to manage an area for recreation. Such an agreement exists and has been operative for many years. DPOR</p>	In the adopted plan, the Government Peak Management Unit is added to the Hatcher Pass Special Use Area. No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>used its 11 AAC 12 authorities to close Title 38 land in Government Peak to motorized uses on a year round basis. This authority is explained at length on pp. 1-15 and 1-16.</p> <p>Note: The Government Peak Unit has been approved as a non-motorized area in the final plan in accordance with public comments and recommendations from the Mat-Su Borough, reflected in borough assembly Resolution No. 10-036, which recommend the unit be closed without any motorized corridors through it. Upon review of overall management strategy, DNR has recommended that the unit be added to the Hatcher Pass Special Use Area.</p>	
Page 1-15 / 1-16 Line 38 – 41 / Line 1-9	General Park Provisions (11 AAC 12). The plan does not state that DPOR is allowed to use their authorities on borough land.	<p>The plan does not state that DPOR can exercise its authorities for the management of recreation on borough land because there is uncertainty over whether adequate authority exists and there are insufficient funds for hiring a ranger for the purpose of providing such management.</p> <p>A management agreement between DPOR, DMLW, and the borough 'intends' that DPOR will be the lead agency in the enforcement of the land that is covered by the agreement. (Generally, the land within the Development Lease between the borough and DNR, ADL 225965). This agreement has never been followed up with more a detailed agreement on the transfer of authorities or with adequate funding.</p> <p>The resolution of the implementation aspects of the current management agreement is not the function of this plan. The resolution of this and other planning and enforcement issues is more properly conducted through the review and possible revision of the current management agreement. The agreement requires annual reviews but this has never occurred, to the best of our knowledge. The plan (p. 4-2) recommends the re-review of this agreement.</p>	No change.
Page 1-16 Line 25	The discussion of Area Plans and Management Plans needs clarification. The HPMP cannot be both.	<p>The distinction between area plans and management plans is explained at length in the section 'Relationship of Management Plan to Area Plans, Land Use Designations, and Hatcher Pass PUA Management Plan'.</p> <p>Management plans can also be area plans if they are developed to meet the requirements of both types of plans. An example of a dual area and management plan is the Knik River PUA Management</p>	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		Plan.	
Page 1-19 Line 16-38	The plan does not state the specific actions that will be taken to implement what the management plan will do.	This section of the plan describes the how the recommendations made in this management plan will be used. It does not deal with plan implementation. Plan implementation, including the specific steps needed to implement the plan, is contained in Chapter 4, pp. 4-1 through 4-17. Refer to that chapter for a description of implementation measures.	No change.
Page 1-19 Line 38	Regulation of or effect upon existing surface leases: the plan should state that it does not affect current surface leases.	The plan text will be revised to indicate that the plan will not affect existing surface leases. (In fact, it does not affect valid existing rights in general.)	Revise plan text to indicate that the plan does not affect valid existing rights, including surface leases.
Page 1-20 Foot Note 11	Why is the regulation process separate from the planning process? They should be done at the same time to implement the recommendations made in the plan.	<p>The development of regulations was conducted as part of the planning process. The final plan contains the associated regulations; see p. 4-2 that describes the regulations generally and Appendix D for the regulations themselves.</p> <p>The draft plan noted that the final configuration of these regulations would have to wait until the adoption of the plan. In many cases the Public Review Draft identified issues affecting regulations as ‘options’; that is, DNR wanted to get public comment on many issues prior to the finalization of the plan and before the development of regulations. It would have been imprudent for the draft plan to develop a set of final regulations until issues regarding the closure of areas to motorized uses were worked out. A more detailed explanation of the regulatory process is contained in Chapter 4. The regulation process for this management plan will be finalized following the adoption of the plan. Typically, the adoption of regulations occurs as a separate process altogether.</p>	No change.
Page 1-21 Line 41	A complete description of the plan revision process needs to be provided.	A description of the plan revision process is included in this plan. The section on “Plan Modification” provides an overview of the plan revision process. The information can be found in Chapter 4 on page 4-11, lines 1 – 33.	No change.
Page 1-22 Line 21	Why are motorized corridors needed for snowmachines to access more remote areas?	Motorized corridors were generally recommended in the draft plan in areas that are shared by all users in order to separate the types of recreational use taking place; motorized and non-motorized. Groomed snowmachine trails should make the access to remote areas, away from the road system, faster for snowmachiners. It may also reduce the amount of off-trail use occurring along popular trails that are shared, such as high marking and “ghost riding”.	An expansion on the discussion of the development motorized corridors will be included in the plan.
Page 1-22 Line 22-23	What facilities are being discussed?	This paragraph is about development of motorized corridors, focusing on the Government Peak Unit. The facilities being	Remove reference to motorized corridor development in the

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		discussed are the Alpine and Nordic Ski Facilities, as stated in preceding lines 19 and 20. Recommendations for motorized corridors in the Government Peak Unit have been dropped in the final plan	Government Peak unit in the final plan.
Page 1-22 Line 4	No definition of the “east side” or “west side” in the draft plan and no map illustrating them.	Definitions of both the “east” and “west” sides of the plan are included in the plan. The definitions can be found on page 1-13 in Footnote 5. There currently is not a map depicting the split between the east and west sides included in the plan. One of our overview maps will be modified to identify the two areas.	The boundary is depicted on the Adopted Plan Map.
Page 1-22 Line 24-25	No data is included to substantiate increase of recreational use levels.	Although no statistical data has been included in the draft to depict the increase in recreation to the Hatcher Pass area, information about the increase of recreational use of the area is discussed throughout the plan, beginning on page 1-22 in the Summary of Issues and further addressed in Chapter 2, in the section related to Recreation, beginning on page 2-20. However, we agree that numeric information related to visitation should be included.	A table reflecting DPOR visitation counts over the past decade to the eastern management area will be included in the final plan.
Page 1-22 Line 29	No data to account for the term “significant” is provided. No reference to the carrying capacity of visitation to the Hatcher Pass Area.	This section of the plan discusses a summary of the issues we learned throughout the planning process. The term “significant” in this context pertains to the expansion of the planning boundary to the Kashwitna River and High Glacier Peaks area, because recreational use related to Hatcher Pass is occurring in those areas. A cultural-ecological study related to the “carrying capacity” of the Hatcher Pass Planning Area has not been conducted.	No change.
Page 1-22 Line 31-36	A reference to the types of uses being discussed needs to be included. Is the paragraph suggesting that the area be turned into a state park? What uses are not compatible with recreation?	The types of uses being discussed in this section are recreational uses. An in-depth discussion about the types of recreational use taking place in the planning area can be found in the Recreation section of Chapter 2, beginning on page 2-20. DNR is not suggesting that the area be turned into a state park. The plan recommends that the area be managed primarily for recreational purposes, rather than commercial development, settlement, grazing, and agriculture, etc. It will be managed under Title 38 (General Land) authorities, not park authorities. Table 2-1 provides a listing of allowed, prohibited, or conditionally allowed uses that are considered compatible with recreation and with mining, where the latter is an allowed use. This description begins on page 2-4.	No change. No change. No change.
Page 1-22 Line 5-6	The plan is being extended to included “remote areas”. What are	In the context of this plan, a “remote area” is an area within the plan boundaries that is not near the road system. These would	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	the “remote areas” and how is a “remote area” defined?	include such management units as Kashwitna River drainage and High Glacier Peaks. The term ‘remote’ is used in this plan consistent with the way that word is defined in a standard dictionary.	
		CHAPTER 2: AREAWIDE POLICIES	
		LINE BY LINE ANALYSIS	
Page 2- 1 Line 34	Central or Primary Management Director or Primary Management Director?	The titling of this section is ‘Central Management Direction: Recreation’. Note the spelling of the word ‘direction’. There is no reference to ‘director’ in this part of the plan.	No change.
Page 2- 1 Line 21-28	Water and fish habitat need to be addressed in the management plan. These uses are not incompatible with recreation or the plan.	Water and fish habitat are addressed in this plan. Refer to the Fish and Wildlife Habitat section of the plan, in Chapter 2, beginning on page 2-16. Management guidelines for the protection of water and habitat are included in this plan, beginning in the General Guidelines Section of Chapter 2 on page 2-8, line 14. Additional stipulations for the protection of water and habitat can be found in the Material Extraction and Public Access, Transportation, & Utilities sections of Chapter 2 that could impact water or habitat. Refer to page 2-15, lines 19-22 and page 2-40 lines 29-34, respectively for that information. Additional guidelines can be found in the management recommendations for each management unit where applicable.	No change.
Page 2- 1 Line 9-12	Where is a list of appropriate and inappropriate uses and who determined these uses? Is there a public participation process for these types of decisions?	The list of appropriate and inappropriate uses on an area wide basis can be found in Table 2-1, which begins on page 2-4 of the plan. The list was developed by DMLW in consultation with other agencies (DPOR, and MSB). The MSB spent considerable time in reviewing this table. There is not a process to determine these uses since the uses are already defined in the plan. However, if the issue is whether the public was involved in the identification of these uses the following is provided: The public was involved throughout this planning process in the preparation of this plan. They were invited to focus group meetings, community council meetings, and open forum public meetings. The public was provided with opportunities to provide public testimony and written comments. Additionally, they volunteered to fill out recreational use questionnaires, which helped the planning group to determine what types of recreational uses were taking place throughout the planning area.	No change. No change.
Page 2- 2 Foot Note 1	Do Generally Allowed Uses affect non-state land? The plan says they do not, but the footnote says they	Generally Allowed Uses do not affect non-state land or land withdrawn or designated by the state legislature for management for special purposes.	The sentence will be re-written to say they “do not” affect...

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Page 2- 2 Line 10	“do”. How are uses determined to be compatible-non-compatible with recreation? Who makes those decisions and was the public involved?	<p>This issue references a goal statement, which is meant to be a general expression of intent. As such, it cannot be used to make determinations of compatibility or incompatibility. However, to provide an answer to the question of how uses were determined to be compatible, the following is provided:</p> <p>Uses were determined to be compatible or incompatible based on whether they would be compatible with the management intent statements for management units and with the plan designation assigned to the units. Management guidelines were also sometimes used.</p> <p>The decision as to whether a use is compatible or incompatible is made by DMLW in the issuance of an authorization or through a written determination under AS 38.05.035(e). Table 2-1 is to be used to make this determination. This identifies, for each management unit the uses that are compatible-incompatible within a given unit.</p> <p>The public was involved in the development of management intent for the various management units, which occurred during the scoping phase of the project. This was then converted into the use matrix of Table 2-1.</p>	No change.
Page 2- 2 Line 15	How does DNR determine if a prohibited use is being allowed on adjacent state land?	On adjacent state land that is affected by another area plan, which would be either Southeast Susitna or Susitna-Matanuska area plans, the applicable management plan would apply. A use would be allowed or prohibited according to the requirements of the affected management unit in the applicable plan.	No change.
Page 2- 2 Line 7	How was the “shift” in public perception and its use determined? What data was obtained and analyzed?	The shift in public perception is that “recreation” is the most popular pattern of use in the Hatcher Pass Area, and other uses are not taking place there, and would not be appropriate. The other uses referred to would include timber harvesting, grazing, agriculture and large scale commercial development. This information was gleaned through the public scoping process in 2009, based on public statements, written comments, and questionnaires completed by the public. All written statements and completed questionnaires are available for the public to review in our office and on our webpage: http://dnr.alaska.gov-mlw-planning-mgtplans-hatcher_2009/	No change.
Page 2- 2 Line 3	What are the “indications” and what are the “use patterns”?	The “indications” that Hatcher Pass has become more of a recreation are based on what has and what has not happened in	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>the area since the 1986 management plan. Since that time, other uses have not occurred, such as grazing, commercial timber, and large-scale private commercial development, while recreation use patterns have increased and expanded throughout the planning area. Given that other uses have not occurred, and recreational use is occurring at such a level that regulations and active management have been needed, one would assume that the trend would continue.</p> <p>The ‘use patterns’ are the recreational use patterns. These are discussed at length in the Recreation Section of Chapter 2 and are specifically identified in map 2-1.</p>	
Page 2- 2 / 2- 3 Line 34 – 40 / 11-18	The discussion on Generally Allowed Uses is unclear and an explanation is needed. This should be explained. More than a regulation citation is needed.	The explanation of generally allowed uses is generally clear but additional text should be added to identify some of the uses that are allowed in this section of Administrative Code. In the Agency Review Draft the region opposed including a listing of generally allowed uses on the grounds that the uses would change. While this is correct, it is nonetheless difficult for the public to know what we mean by Generally Allowed Uses without some kind of indication. The language that is proposed to be added is directly taken from Administrative Code and is unlikely to change significantly, but provides some clarity as to the types of uses that can occur on state land as generally allowed uses.	Add after, “... form of authorization from DNR”: on line 6, p. 2-3: “Uses that are generally allowed include non-motorized and motorized forms of transportation. Some allowable non-motorized uses include hiking, climbing, skiing, bicycling, or travel by horse or dogsled. Motorized use is allowable for highway vehicles up to 10,000 pounds on road easements and all-terrain vehicles up to 1,500 pounds, on or off road, provided the use does not cause adverse effects to water quality, ground disturbance and significant rutting. “ See 11 AAC 96.020 for complete list of allowable uses.
Page 2- 3 Line 35-36	The draft plan does not describe how a plan amendment occurs and should.	The procedures for plan amendment (as well as other forms of plan revision) are explained at length in the section ‘Plan Modification in Chapter 4 (p. 4-11).	No change.
Page 2- 4	The table should say whether or not a permit is required.	Line 31, p. 2-3, which proceeds and explains the table, already notes that the uses in this table require some type of authorization by DNR.	No change.
Page 2- 5 Table 2-1	Mining should be recognized as an appropriate use on the East Side. Table 2-1 does not mention this use and needs to be revised to include it.	The table simply says that mining is “Allowed in areas open to mineral entry consistent with applicable requirements under 11 AAC 96.025, ... “ This means that mining can occur anywhere within the Hatcher Pass area where this use is allowed under standard mining laws and a mineral closing or leasehold location order does not exist. This would include those portions of the East Side where valid mining rights exist and areas not closed to mineral entry.	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Page 2-5 Footnote 6.	Leases are one type of disposal of state land that may be appropriate. Wouldn't rights of way that are functionally irrevocable also be appropriate?	Correct; although the Hatcher Pass area in general is to be retained as state land, both leases and rights of way that are functionally irrevocable, may be appropriate forms of disposal. Add the words "rights of way that are functionally irrevocable"	Revise Footnote 6 to: " <u>Leases and rights of way that are functionally irrevocable (which are types of disposals) are allowed.</u> "
Page 2-10 Line 31-35	The text lists a number of state statutes that affect mining development, operations, and reclamation but there are other statutory requirements as well. These also need to be identified.	Change text to clarify that other requirements affect mining activity than those that are listed there. Other state and federal requirements also apply. Add sentence that indicates this (line 35).	Add sentence after...""and AS 29.19 (mining reclamation)". 'Other state and federal requirements also apply.'
Page 2-11 Line 31	Other requirements apply and affect mineral development and operations but are not stated.	Change text to clarify that other requirements apply.	After AS 27.19, add "as well as other state and federal requirements" ...
Page 2-11 and 2-12 Lines 30-43, p. 2-11 Lines 1-22, p. 2-12	Mineral development will be impaired or altogether precluded by the Management Guidelines related to Scenic Resources in the Subsurface Resources section. These standards are often impossible to meet because of physical and geologic constraints and are cost prohibitive. If DNR is determined to include them in the plan, they need to be revised to link with the review process associated with Plan of Operations submitted with mineral development.	Generally concur. The standards that are contained in the Public Review Draft are a modification of the requirements of the original plan, which was adopted in 1986. Although there have been no major difficulties in the use of these standards, some of the standards are, admittedly, difficult to meet and, more importantly, the standards do not describe the management objectives that are intended to be achieved and are not matched into the mineral development review process conducted for such projects. It is preferable to replace the current standards with what management objectives as to what is intended to be achieved and to link the standards into the typical DNR review process for such projects.	Revise plan; delete lines 40-43 on p. 2-11 and lines 1-22 on p. 2-12 with the wording in Appendix B.
Page 2-13 Line 5	There is no boundary on a map or definition of the east-west side included in the plan.	Definitions of both the "east" and "west" sides of the plan are included in the plan. The definitions can be found on page 1-13 in Footnote 5. There currently is not a map depicting the split between the east and west sides included in the plan.	No change
Page 2-14 Line 19	Material (rock, sand, and gravel) may be required as part of a mining operation. These should be managed as part of an overall mining development at the time of permit review.	It is appropriate to clarify in Table 2-1 that materials that are directly related to a mining operation are to be managed as part of the mining operation and that the review of this aspect of mine development is to occur through the review of the plan of operations for a proposed mine. This clarification should affect both the mining and material extraction portions of this table.	Add under the column 'Comment' for Material Extraction in Table 2-1 (p. 2-5), that materials directly related to a mining operation are to be managed as part of the mining operation and that the review of this aspect of mine development is to occur through the review of the plan of operations for a proposed mine.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Page 2-14 Line 36-37	Appropriate design, drainage, and refuse removal must also take place at material sites.	Material sales require authorization by DNR, which the region performs. These issues are best dealt with at the site specific level, not through a large-scale management plan. SCRO, in its review of material sale authorizations, deals with these concerns through a written decision process. A standard form is filled in by the applicant that deals with a wide variety of issues, including design and drainage. This is then reviewed by SCRO against general standards and a written authorization is issued. Stipulations are included in these authorizations if the plan of operations that is submitted is inadequate. It is inappropriate for a management plan at this scale to deal with specific design issues since adequate controls already exist and are used by the region in the granting of authorizations.	No change.
Page 2-15 Line 10	The word conditionally is not defined and is not defined.	The term ‘conditionally’ is commonly used in land use management and does not require additional clarification. However, this term should be defined in Table 2-1 so that it application is better understood in future adjudicatory actions. See Chapter 2, Topical response, under Table 2-1, following.	No change.
Page 2-16 Line 13-17	No data is reflected for recreational use impact on fish and wildlife in the planning area.	ADF&G did an in-depth analysis of the area in the late 1980’s and has done follow up analysis on a smaller scale in subsequent years. As part of the revision of this plan, DNR consulted with both ADF&G central area and area biologists to update fish and wildlife information. They were unaware of any significant impacts to wildlife in this area, and therefore no need for an evaluation of the impacts.	No change.
Page 2-17 Line 29-35	How does increasing recreational use affect fish and wildlife habitat? There is no discussion in the draft plan.	To the best of DNR’s knowledge, recreational use has caused no significant impact on fish and wildlife. There has been no indication from ADF&G that would suggest adverse impacts. If impacts were to occur, it would likely be on the west side of the planning area where extensive ORV use takes place.	No change.
Page 2-18 Line 18	The word ‘authorization’ is not defined in the plan. Does it have a particular meaning?	The term ‘authorization’ refers to decisions by DNR that involve the disposal of interest, a material sale, or for a permanent structure that would otherwise require an authorization (other than by permit) by DNR for such an activity to occur, such as for power transmission lines, communication sites, hydroelectric facilities, public facilities, and commercial structures. This does not include those authorizations that are related to mining. These types of uses involve a disposal of state land or an interest in state land.	Add definition of ‘authorization’ to Glossary; “As applied in the Hatcher Pass Management Plan, authorization refers to those decisions made by DNR that involve the disposal of state land or an interest in state land. This also includes the issuance of rights-of-way authorizations that are functionally irrevocable. It does not include land

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
			use permits or authorizations related to mining, where authorization occurs through different processes.”
Page 2-18 Line 37-40	Trail construction and management standards should be provided.	The plan currently refers to the state trail and management standards, but does not contain the actual standards themselves. As a matter of practice, DNR plans do not include all back-up data and studies in its plans. Design standards change over time and including them a plan means that plan standards will diverge over time from operation standards. We want to avoid this.	No change.
Page 2-19 Line 18-20	Do viewshed related problems exist today? There is no discussion provided on viewshed management guidelines.	Viewshed management issues as viewed from Hatcher Pass Road currently exist. This issue is addressed in multiple sub-sections of the plan and occurs specifically as management recommendations for the overall planning area and for individual management units. Refer to the management guideline for viewshed management in the Recreation section in Chapter 2, p. 2-33, for an explanation of viewshed requirements and to the individual managements units for how these requirements are applied in specific areas.	No change.
Page 2-20 Line 26	A definition of “particularly heavy” is needed.	“Particularly Heavy” means that the recreational use takes place in that given area on a regular basis by a large number of recreational users. The meaning of this term can be obtained from a standard dictionary.	No change
Page 2-20 Line 23-25	If an area that is now closed to motorized use is being used by motorized users, why has it been allowed to continue? What will be done to enforce these restrictions in the future? The plan is silent on the issue of enforcement.	It has not been allowed to continue. It occurs as an illegal act and enforcement action is taken in areas closed by regulation by DPOR. However, there are insufficient resources to monitor all areas at all times. DPOR enforces what it can and some areas may not be patrolled the time that the incident occurs. The plan makes enforcement easier, but it will not resolve the problem until more resources are provided to DNR and until there is a change in the behavior of a few individuals. The plan recommends the realignment of closed area boundaries to make it easier to enforce and opens areas (that are now closed to motorized use) where such use is appropriate (and occurs currently.) The revised boundaries follow topography, which should help alleviate some confusion over where a closed area starts and ends. The decision to provide additional resources is outside the province of this plan as are the needed changes in behavior. It is not appropriate for a plan of this type to get into a detailed discussion of enforcement. That is more of an operational issue	No change. No change. No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		that requires a different type of analysis, which is often quite detailed. However, the need for enforcement is recognized in the plan as well as the need to revise our current operating agreements that assign roles and responsibilities. The latter is discussed at length in Chapter 4, page 4-2, lines 1 through 23. DPOR and DMLW are working on a revised management agreement to address the management and enforcement roles of each agency. Until that time, the existing management agreement will serve as the guide.	
Page 2-20 Line 39-43	Is there a weight limit for off-road recreational vehicles?	Yes. Motorized use is allowable for highway vehicles up to 10,000 pounds on road easements and all-terrain vehicles up to 1,500 pounds, on or off road, provided the use does not cause adverse effects to water quality, ground disturbance and significant rutting. (See 11 AAC 96.020 for complete list of allowable uses).	No change.
Page 2-20 Line 14-20	No information is provided regarding the growth of recreational use or how that growth was determined. These statements are not supported by objective information or data.	Although there is not a statistical analysis of the rate of use in the Hatcher Pass Planning Area, it is discussed at length as stated previously. There will be a table depicting DPOR's counts of visitation to the east side included in the final plan. This type of information is not available for the west side as there is no active management presence for recreational use on the west side.	(Previously covered; revise plan to include table of numeric recreation information)
Page 2-20 Line 7-9	No information or data provided to support that recreation has been the main use within the HPMP area for the last 30 years.	As stated previously, although no statistical data has been included in the draft to depict the increase in recreation to the Hatcher Pass area, information about the increase of recreational use of the area is discussed throughout the plan, beginning on page 1-22 in the Summary of Issues. A careful reading of Chapter 2, in the section related to Recreation, beginning on page 2-20 provides generous information about the increase in recreational use of the area. Further, other uses that were originally intended for the area, including grazing, agriculture, and commercial development have not occurred. The use that has occurred is recreation.	No change.
Page 2-20 Line 20	What types of non-motorized use are being discussed?	The types of non-motorized recreation that occur in Hatcher Pass are discussed according to season. The types of winter non-motorized recreational use are discussed on page 2-20, lines 31-34. The types of summer non-motorized recreational use are discussed on page 2-23, lines 1-8.	No change.
Page 2-21 Map 2-1	ATV-ORV Use is depicted in the Government Peak Unit, which is supposed to be closed to motorized recreation.	The map is a depiction of where recreational uses take place. The information on the Recreational Use Patterns map was obtained through multiple focus group meetings where members of the public demonstrated where they recreated and how or where they have seen various types of recreation taking place. The map is not a depiction of where uses are allowed to take place.	No change.
Page 2-23	Eliminate the word "some" between	Concur.	The word "some" will be removed.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Line 33	designated routes.		
Page 2-23 Line 22	There is no discussion of carrying capacity, enforcement, refuse removal, safety, or enforcement.	<p>This comment is directed to the listing of goals related to Recreation in Chapter 2.</p> <p>There is no discussion of carrying capacity for the reasons given previously and as discussed in more detail in the recreation section of Chapter 2, 'Topical Issues'.</p> <p>Public safety is addressed in one of the goals (line 32, p. 2-23) already. Several of the other goals address the issues related to enforcement.</p> <p>It is inappropriate for this section of the plan to include a goal related to sanitary facilities and enforcement.</p> <p>Enforcement issues, sanitary facilities, and public safety, and enforcement are addressed in multiple parts of the plan. The recommended changes in regulations, which form the basis for enforcement, is, for example, discussed on p. 4-2, lines 24-37. Sanitary facilities are described as individual projects in Table 4-1, 'Facility Recommendations on State Land'. Public safety issues are addressed in various management units and in the Recreation of Chapter 2. See, particularly, the Archangel and Reed Lakes-Little Susitna units.</p> <p>The discussion of refuse removal is outside the scope of this plan.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
Page 2-23 Line 27	Where are the appropriate places to separate non-motorized and motorized recreational use?	<p>The draft plan provided information about the separation of uses taking place by recommending areas of recreational motorized closures and the establishment of separate motorized corridors. The recommendations for motorized corridors on the east side of the planning area are not being carried in the final plan.</p> <p>Existing areas of closure have been reconfigured to follow topographical features, including the Hatcher Pass Special Use Area and Government Peak. The Mile-16 Triangle has been recommended for closure. Additionally, the final plan recommends that the southeast section of the Archangel Unit, including Marmot Mountain and a section of the Archangel Road be closed for motorized use in the winter and opens the southwest section of the Hatcher Pass Special Use Area to snowmachines. See map 2-3 for a depiction of recommended closures.</p>	No change.
Page 2-24 Line 17-34	The recommendations are not simple to follow or understand. The user	The comments reference a general description of the approach to be used in the future to manage recreation use. However, this is	Information further explaining the use of closures and corridors in an effort to

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	conflicts have been noted. Information on how to resolve them is needed.	<p>not a recommendation section; rather, it describes the plan's overall management intent for recreation, which is intended to be generalized. Specific recommendations are contained in the section, 'Management Recommendations', pp. 2-32 , 2-33 as well as the individual management units. These are laid out in a very straightforward way and should be readily understandable.</p> <p>The plan provides information about the resolution of user conflicts by recommending a realignment of currently closed areas, new areas of closure, and separate motorized recreational corridors in areas of high conflict, especially Archangel Road. See map 2-3 for a depiction of the closures, which have been recommended to resolve conflict.</p>	separate recreational users and reduce conflict will be included in the plan.
Page 2-24 Line 32-33	Where are the motorized corridors? How was it determined that the east side should be developed to accommodate motorized use?	<p>The motorized corridors are reflected beginning on Map 2-3 and each management unit map where applicable.</p> <p>This section (lines 32, 33) of the draft plan does not state that the east side should be developed to accommodate motorized use. What it says is that "designated motorized corridors on the East Side be actively developed to accommodate motorized use."</p> <p>Although motorized corridors on the east side of the planning area were stated as an option in the draft plan, that recommendation is not being carried in the final plan.</p>	Delete recommendation for active development of new motorized corridors on the east side of the planning area. Retain recommendation for improvement and enlargement of the existing east-west corridor.
Page 2-31 Line 28-30	What does managing for tourism purposes consistent with the availability of infrastructure mean? Who determines if there is sufficient infrastructure and how is it determined. What type of infrastructure is required?	<p>The relationship between the plan and tourism is described in a different way than stated that in the comment. It states that "This management plan supports the use of the Hatcher Pass management area for tourism purposes, consistent with the availability of infrastructure." The plan does not purport to manage for tourism per se, although it recognizes tourism as an important component of what occurs in the Hatcher Pass area and that this is an appropriate use. The term 'consistent with infrastructure' relates the ability to accommodate increased tourism with the capacity of the infrastructure to support these increases.</p> <p>The plan identifies those improvements necessary to support public safety and current/future recreation needs, consistent with the management intent of particular units. Infrastructure requirements therefore focus on parking facilities, sanitary facilities, road pull-outs and the like. It does not identify infrastructure recommendations intended to support tourism per se.</p> <p>The types of infrastructure will be determined at an operational</p>	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		level by the land owner or agency responsible for land management. On MSB owned land, the MSB will decide the types of infrastructure necessary to accommodate their tourism related activities. On land managed by DPOR, DPOR will decide the appropriate infrastructure. On land managed by DMLW SCRO, SCRO will decide what infrastructure is appropriate through their permitting and authorization process. Examples would include the Nordic Ski Facility, Independence Mine State Historic Park, and the Alpine Ski Facility Development Lease with the MSB, respectively.	
Page 2-31 Line 15-16	Where is the Spur Road and how will it be managed and maintained?	The term being referred to is a “spur road”, not a road named Spur Road. A definition of the word “spur” can be found in a common dictionary. Although the word has multiple meanings, in this instance, the term “spur” is used to describe an off-shoot or pull-out on the existing Hatcher Pass Road.	No change.
Page 2-32 Line 11-18	How is “unique” determined and by whom? Who determined public values? How did DNR become the lead agency on this plan for signage?	<p>This comment refers to the inclusion of the Mile 16 unit and the Reed Lakes area in the Hatcher Pass Public Use Area. The word ‘unique’ related to the physical, environmental, and recreation values that each area possesses. The definition of the word “unique” can be found in a common dictionary.</p> <p>The public submitted numerous comments and offered numerous statements regarding how they valued the Hatcher Pass planning area. The planning group gleaned from those comments and statements, that the Reed Lakes area and Mile 16 unit were appropriate for inclusion in the Hatcher Pass Public Use Area. They thought that these areas were similar to other areas in the Hatcher Pass PUA and deserved similar statutory treatment.</p> <p>DPOR became the lead agency for signage in the Hatcher Pass Planning Area because they have an active management presence in the east side of the planning area. The HP Special Use Area and HP Public Use Area are located in the east side. Additionally, it is on the east side where signs pertaining to allowable recreational use will be needed since the majority of the west side is open to motorized use. SCRO will be responsible for signage in the Bald Mountain Ridge HA and ADF&G will be responsible for signage in the Willow Mountain CHA.</p>	No change.
Page 2-32 Line 29-39	How was it determined that non-motorized regulations needed to be revised? What are the goals of such a revision? How will know if the goals are achieved?	The existing standards (11 AAC 96.014) were developed in 1986. Since that time there have problems of enforcement, interpretation of regulatory boundaries, and some areas that were relatively unused in the mid 1980’s are now heavily used and require additional management. In addition, there is inconsistency	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>between those areas that are used for snow-machining and that allowed in the regulations , and parks authorities have been utilized to close areas to motorized use when Title 38 authorities should have been utilized instead. All of these conditions argued for a change in the current regulations.</p> <p>The goals of this change are to make it easier for Park Rangers to enforce the regulations, make actual winter motorized use patterns consistent with regulatory requirements, ensure consistency in the application of regulations within the Hatcher Pass area, and create safer user conditions.</p> <p>Fewer enforcement and safety problems after the enactment of these regulations will indicate whether the intent has been achieved.</p>	
Page 2-32 Line 2-3	Where are avalanche areas?	An avalanche study was done prior to the 1986 HPMP. It identifies avalanche run-out chutes in the Hatcher Pass area. Areas with high avalanche risk have not changed since that time. DNR may include a map of avalanche prone areas in the final plan.	No change.
Page 2-32 Line 29	Why isn't Marmot Mountain addressed as an area in the 'plan recommendation' that needs closure and revised regulations?	<p>Although the PRD does not make a recommendation for Marmot Mountain to be closed to recreational motorized use and revised in regulations in the base recommendation, the issue about recreational user overlapping concerns is addressed. The area is depicted on Map 2-2, 'Overlapping Use Concern Areas'. It was also recommended for closure under the 'Winter Option' because of those concerns.</p> <p>Based on comments received from the public and the recommendations in the Mat-Su Borough Assembly Resolution No. 10-036, the final plan does recommend the closure of an area of less than 640 acres in the Marmot Mountain area during the winter. It is also recommended that the regulations for the planning area should be revised to include the closure of this area.</p>	No change.
Page 2-33 Line 3-6	How will DNR make the decision on 'most appropriate approach'? What criteria will be used? Who makes the decision?	This issue is pertinent to the selection of the alternative winter use option or the approach recommended in the draft plan. DNR has chosen to implement a modified version of the winter use option on the basis of public comments, the effectiveness of approach in terms of safety, management, and enforcement. The management approach that has been adopted includes aspects of the Mat-Su Borough Resolution No. 10-036 and is depicted on the Adopted Plan Map.	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>The aforementioned criteria will be used as the basis for this decision.</p> <p>The DNR Commissioner makes this decision, ultimately, following internal DNR review involving the Divisions of Mining, Land, and Water and the Parks and Outdoor Recreation.</p>	
Page 2-33 Line 3	Most oppose the “Winter Option” because they believe that the Reed Lakes area needs to stay non-motorized as designated in the 2002 regulations. Why would the State consider this?	<p>This was a concept proposed by the motorized users during a number of Focus Group work-shop meetings as a way to separate motorized and non-motorized users. The concept was discussed between non-motorized and motorized users as a potential “trade” for areas of winter recreational use. We provided it in the draft plan to get feedback from the general public to gauge support or opposition to it. Ultimately, we chose to recommend a modified version of the “Winter Option”. (See above response).</p> <p>This issue is further discussed in the recreation section of the ‘topical’ responses of Chapter 2.</p>	No change.
Page 2-33 Lines 16-17, 23	Do the viewshed management requirements affect current uses or historic uses, or are they meant to apply only to new projects? Also, this guideline must recognize that some uses will have an impact, and are still appropriate.	The viewshed management requirements are meant to apply to new projects, not existing facilities or to historic structures than have been located at a site or area for many years. It is appropriate to provide qualifying language to this effect. DNR also concurs that certain uses will have an impact on the viewshed and may still be appropriate and that qualifying language is necessary.	<p>Include a footnote after the words ‘Viewshed Management’ that states: “This standard does not apply to current existing facilities or to historic uses of an area that are being renovated or improved at the same site or area that they currently occupy.”</p> <p>After “... visual presence of the use. “, insert the following: “In these instances the plan recognizes that a use may produce an impact but may still be appropriate; the management objective in these situations is to focus on the minimization of impact to visual resources, which may require the use of stipulations to achieve this objective.”</p>
Page 2-33 Line 31-38	No standards are provided for developing public use cabins. How many PUCs should be developed? Who makes this decision and how is the decision made?	<p>Standards for the placement of cabins are identified on lines 36-37. However, we will agree to the inclusion of additional criteria for the siting of these facilities.</p> <p>It is indeterminate as to the number of cabins that can or should be developed. The number is a function of funding, enforcement capability, changes in organizational authority, and the siting of cabins relative to each other and to terrain and other factors</p>	Revise text to include the following additional criteria: public use cabins should not be located in moose concentration areas, within 200’ of streams, in avalanche areas, or in intensive use areas.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>influencing siting.</p> <p>The decision is to be made through a detailed site analysis (see lines 33- 38) and through standard SCRO DMLW permitting processes and standards (see lines 34-35).</p>	
Page 2-37 Line 11-14	What ‘road’ is being discussed ‘west’ of the independence mine? How are large vehicles defined?	The road is the Hatcher Pass Road and the reference to ‘large vehicles’ are to vehicles that require wide turning radiuses, like tour buses.	No change.
Page 2-37 Line 21	There is no definition of carrying capacity and how it relates to providing access nor is there any discussion about the potential for land degradation and how it might be avoided.	The line reference is to goals related to Public Access, Transportation, and Utilities. It is inappropriate to include a discussion of “carrying capacity” and “potential for land degradation” issues in a goal section of the plan.	No change.
Page 2-37 Line 40-42	How will these actions be accomplished? (Refers to goal relating to Off Road Access). What is the ‘trigger’ to resource degradation? Who makes the decision?	<p>This is a goal section of the plan and is a statement of general intent. It states that motorized use should be provided on state land to provide access to state resources while ensuring public safety and minimizing resource degradation. It does not attempt to specify implementation actions.</p> <p>These goals are to be accomplished through DNR management and the development of sustained motorized trails in the West Side. With the East Side, where there is a DPOR presence, active enforcement will exist. On the West Side the Generally Allowed Use standards of 11 AAC 96.20 apply. Enforcement is more difficult in these areas because of the absence of enforcement authority by DMLW except through civil action, which is practically difficult.</p> <p>The standards in 11 AAC 96.014 and 025 constitute the ‘trigger’. When these are exceeded, the standard is violated and DNR can take enforcement action.</p>	No change.
Page 2-37 Line 42	Natural resource degradation is occurring. What measures will be put into place to stop, repair, and not allow further damage?	Natural resource degradation is occurring within <i>portions</i> of the Hatcher Pass area. Degradation is generally related to summer motorized use (ORVs) on the West Side. A detailed response to this issue is provided in Chapter 2, Topical Issues, under Public Access.	No change.
Page 2-38 Line 24	How will the management guidelines in this section be enforced?	The closures that are (or may be) included in the final approved plan will be adopted by regulation. This is described any number of times in the plan and at length in Chapter 4, which deals with implementation. See lines 24-37, page 4-2. Once adopted, they will be enforced by DPOR and DMLW under the authorities relative to each division.	No change.
Page 2-39	What is considered “adequate snow	Adequate snow cover for the protection of underlying vegetation is	A statement regarding the 30” standard

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Line 4	cover”?	considered to be 30” by the Department of Parks and Outdoor Recreation.	for adequate snow cover by DPOR will be added to Page 2-39, line 4.
Page 2-39 Line 23	How is practicability determined and who determines it? (The reference is to power transmission lines.)	The practicability of undergrounding of power transmission lines is addressed by the applicant as part of the review under local and state review processes for such facilities. The determination of practicability is first made by the applicant; subsequent local and borough processes are then used to review this aspect of the decision as well as other aspects. Ultimately, local and state review processes make this determination.	No change.
Page 2-39 Line 25-26	It will rarely be possible to place power transmission lines underground. It is cost prohibitive to do this and often the bedrock is very close to the surface in many locations.	Concur. While the undergrounding of power distribution lines may be possible, it is generally not feasible to underground power transmission lines over 115KV. The management guideline for power transmission lines needs to be changed to acknowledge the practical reality of costs and geology while still attempting to reduce the visual presence of such facilities.	Replace current wording on lines 25 and 26 that begins with “Power transmission” with the following: “Power transmission lines (>115KV) shall be situated and designed to minimize or reduce the visual disturbance produced by such facilities. This is particularly important for transmission facilities that may be viewed from the Hatcher Pass Road. If it is determined in the DNR authorization that such facilities cannot be located to minimize or reduce visual impacts in a significant way and must be located in view of this road, screening of the more visible locations may be required and the types of poles and structures should be selected to minimize visual disturbance. “Utilities may only ...
		CHAPTER 2 AREAWIDE POLICIES	
		TOPICAL ANALYSIS (organized by topic in chapter)	
Generally Allowed Uses – Areas where uses are constrained	There should be the ability to use motorized vehicles throughout the plan area, without restriction. Doesn’t existing law or administrative code mandate this?	Alaska Administrative Code (11 AAC 96.020) identifies those uses that can occur on general state land, such as occurs in Hatcher Pass. This section also provides that the uses allowed in that code section can be limited, in the overall public interest. Regulations (11 AAC 96.014) have been enacted (2002) that limit the use of motorized vehicles at certain times of the year and in certain areas. Within these areas, motorized use is constrained; in all other areas, however, the full range of uses allowed under Generally Allowed	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		Uses can occur.	
Generally Allowed Uses – Degradation of wetlands and soils	The Generally Allowed Uses permit the degradation of both soils and wetlands. How will DNR ensure that this degradation does not occur, especially in light of the inability of these standards to limit degradation?	<p>The Generally Allowed Uses, by themselves, do not result in the degradation of the soil mantle and of wetlands. There are specific standards under 11 AAC 96.025 that limit the operations of motorized vehicles. These standards provide that activities employing a wheeled or tracked vehicle must use existing roads whenever possible, that there is to be no degradation of vegetation, soil stability, drainage systems, or fish and wildlife habitat. The regulations by themselves are adequate; the problem is with those individuals who choose to use their motor vehicles in a way that is inconsistent with administrative code.</p> <p>Ultimately, the solution to the problem of non-adherence to current standards is a change in the perspective of those that now operate their vehicles inappropriately. Attitudinal change will be necessary. This plan cannot attempt to change public attitudes in a significant way but it can recommend the use of signage, continued education, and the repositioning of areas closed to motorized use closer to parking lots and roads, where enforcement is easier. All of these actions are recommended by the plan.</p>	No change.
Uses Requiring Authorization (Table 2-1)	The table and the text that explains the table list a number of state statutes that affect mining development, operations, and reclamation. It also misstates where mineral development may be allowed.	Change the section of Table 2-1 under 'Mining' (p. 2-5) to clarify that other state and federal requirements affect mining activity and that mining is allowed in areas with valid existing rights for that purpose. (Actually, the latter needs to be broadened to include all valid existing uses, not just those related to mining.)	Change second column related to mining to: 'Allowed in areas with valid existing rights and in areas open to mineral entry consistent with applicable requirements under 11 AAC 96.025, 11 AAC 97, and AS 27.19, as well as other pertinent state and federal requirements affecting mining activities.'
Uses Requiring Authorization (Table 2-1)	The term 'conditionally allowed' is used throughout this table but is not defined.	<p>Add a definition for 'conditionally allowed' in the Glossary.</p> <p>Although this term is in common usage in both local and state land management, its definition is helpful in future adjudication actions.</p>	Add definition of 'Conditionally Allowed' to the Glossary. Conditionally Allowed means that a use may be allowed in a DNR adjudicatory decision if the use is consistent with the management intent of the unit in which it occurs and is otherwise consistent with state and DNR requirements for such uses.
Uses Requiring Authorization (Table 2-1)	Hydroelectric facilities should be included in table 2-1.	It is appropriate to add this use as a conditional use to Table 2-1. There have been recent applications for this type of use recently and more hydroelectric facilities are potentially possible in the	Add hydroelectric facilities as a conditional use to Table 2-1.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		future.	
Uses Requiring Authorization (Table 2-1)	Utilities (including telecommunication facilities) should be listed in Table 2-1.	It is appropriate to add this use as a conditional use to Table 2-1. There have been recent applications for this type of use recently and more such facilities are likely in the future.	Add Utilities (including telecommunication facilities) to Table 2-1 as a conditional use and include in the 'Comment' column a reference to the management guidelines for such uses in Chapter 2.
Uses Requiring Authorization (Table 2-1)	A statement should be added to Table 2-1 to indicate how uses not specifically noted in the table are to be treated.	This is an appropriate revision since almost certainly over the 20 years of the plan other uses than those noted in the table will occur, forcing DNR adjudicators to make a decision as to how to treat these uses.	Add the following to line 36, p. 2-3, following "... to authorize the use." <u>In instances where a proposed use is not listed in this table, adjudicators are given the authority to determine if the proposed use is similar to one or more of the uses included in the table. If so, it shall be treated in a similar fashion to that use. If not, it shall be treated as a conditional use.</u>
Subsurface Resources: Development Standards	The development standards in Chapter 2 essentially preclude development in the Craigie Creek management unit. The Lucky Strike Mine, located in this unit, is situated next to the Hatcher Pass Road and is readily visible from it. There is little ability to adhere to the standards as now written and, if they were to be interpreted and implemented in a strict way, this would shut down the mine and leave many workers unemployed.	The probable areas of future mine activity in the Hatcher Pass area will collocate with the distribution of metallic minerals, and most of these areas are either near the road or are readily visible from it. There is no intention in the plan to preclude mineral development in this unit or in other locations within the Hatcher Pass area where mineral exploration and development is allowed under Alaska statute. The purpose of the guidelines is to mitigate the adverse scenic impacts created by mining activity, among other aspects. Although the management guidelines are meant to be employed by DNR in a way that allows for mine development while protecting scenic resources, strict interpretation of them could make it difficult to proceed with mine development. Accordingly, modification of these guidelines is appropriate.	Replace the current text relating to Scenic Resources with the wording in Attachment B.
Subsurface Resources: Utilities	The current wording of this management guideline (2. Utilities) does not adequately express what is intended to be accomplished in regards to utilities.	Partially Concur. Replace current wording with the following: "Utilities are to be situated, to the extent practical, so that they are not visible from the Hatcher Pass Road. They should be screened or buried, and they should blend in with prominent natural topographic features rather than stand out as a dominant landscape feature."	Revise plan: see Response
Sub-Surface Resources: Mining Management Standards	The plan does not adequately address mining standards. The 1986 Plan did. If mining is going to continue in Hatcher Pass, standards need to be in place similar to the	DNR maintains that adequate mining standards exist currently and that additional mining requirements are not needed, except for those related to utilities and scenic and heritage resources that are now included in the plan.	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	standards of the 1986 plan.	The standards that exist in the 1986 plan are longer relevant and have been superseded by a variety of state and federal regulatory requirements. These requirements are extensive and it is inappropriate for the plan to develop competing standards.	
Subsurface Resources: Mineral Closures – Independence and Archangel units	There is opposition to the closing of these two areas, which total together 635 acres. According to AMA, additional closing orders are not justified given the high mineral potential of the area. It is inappropriate to close these areas to mining since mining is a temporary use and the land can be reclaimed after the use terminates. Potential conflicts can be handled through the permitting process. If necessary, the two areas could be subject to a leasehold location order.	<p>DNR believes that it is appropriate to retain the smaller of the two closures, situated at the Independence Mine State Historic Site, but agrees to reduce the size of the larger closure to an area that collocates with the area of proposed recreation facilities associated with the Reed Lakes Trail. The latter would be reduced from 585 to approximately 130 acres.</p> <p>The smaller of the two closures, consisting of only 50 acres, occupies a small area at the existing Independence Mine State Historic Site. Areas surrounding this proposed closure are all closed to mineral entry. This area, which coincides with the Historic Site itself, remains open and requires closure to protect the historic and cultural values of the Historic Site. This area had been inadvertently missed when the Historic Site was closed to mineral entry previously.</p> <p>The larger of the two proposed closures, consisting of 585 acres, is located in the Archangel management unit and collocates with an area that this extensively used for recreation by the public, on both a winter and summer basis. Recreational facility improvements are also scheduled for portions of the area affected by the mineral closure. Nonetheless, based on AMA concerns, DNR considers it appropriate to reduce the size of the proposed closure to about 130 acres and to focus the closure on the area of proposed recreation facilities since mining activity is inconsistent with recreation facilities. This closure now includes the Reed Lakes trailhead.</p> <p>Areas immediately to the east of the proposed closure, situated in the Reed Lakes and Reed Creek drainage, have been closed for over 20 years, and were closed for essentially the same reason – to protect the widespread use of this area for public recreation use, both winter and summer.</p>	<p>Reduce the size of the larger of the two closures to about 130 acres, focusing the closure on the area of proposed public recreation facilities at and near the current unimproved trailhead for the Reed Lakes Trail.</p> <p>Note: this change will affect portions of Chapter 2 (subsurface resources); the management recommendation in Chapter 3 (Archangel and Reed Lakes/Little Susitna units), and the Mineral Closing Order and its associated Administrative Finding. Changes to the plan text in Chapters 2 and 3 will be made at the time the final plan is compiled. Changes to the Mineral Closing Order and Administrative Finding must be made at plan adoption; Appendix C for revised wording.</p>
Subsurface Resources: Mineral Closures – Hatcher Pass Public Use Area	AMA is opposed to the expansion of the Hatcher Pass Public Use Area to include the Reed Lakes-Reed Creeks area. Since the PUA closes land to mineral entry, this action would, in effect, be a mineral closure. It would	<p>The inclusion of the Reed Lakes-Reed Creek area (as well as the 16 Mile unit) within the Hatcher Pass PUA is to provide the same type of protection that is afforded to the areas currently within the PUA. There has been strong public support for this approach throughout the planning process as well.</p> <p>The areas proposed for inclusion are now closed to mineral entry:</p>	Change recommendation to state the effect of this action on mineral development. This impact is not readily apparent in the recommendation and needs to be noted.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	require a mineral closing order. They question why the current management scheme cannot handle the type of development-use that is proposed for this area. It is not a justifiable action.	MCO 496 closes the Reed Lakes area and MCO 499 closes the small part of the Mile 16 unit that is not included in the existing Public Use Area. There is no adverse affect upon the mineral industry from the proposed expansion of the PUA; the areas are closed under AS 38.05.185 authorities.	
Subsurface Resources: Public Access within and to Hatcher Pass area	AMA recommends that DNR identify additional access to and within the Hatcher Pass area. Much of the congestion related to recreation is not because of the non-availability of land but rather because of limited access.	DNR management plans are not intended to identify road improvements of an areawide nature. This is the province and responsibility of the ADOT-PF. In discussions with that agency they do not believe that additional road access is needed at this time to the Hatcher Pass area. Access, for purposes of recreation, is more a function of the provision of corridors for snow-machine use. Adequate access to the West Side for summer ORV use exists; the real need is the provision of multi-use trails developed to sustained trail standards that will accommodate long-term ORV use within the west side of the planning area. Access to remote areas in the East Side during the winter can be provided through access corridors such as a potential East-West Corridor within the Government Peak unit and by allowing for winter motorized access up the Reed Creek drainage. Both are carried as recommendations by the final plan.	No change.
Subsurface Resources: ORV Access to Mining Claims	ORVs are the only effective means of transportation to mining claims and any changes to the current Hatcher Pass management plan would create great hardship since, presumably, the revised plan would place unwarranted restrictions on such access.	The revised plan does not change the current management approach of allowing access through designated non-motorized areas by ORVs to mining claims. Such access is either controlled by 11 AAC 96.020 on state land that is not closed to non-motorized use and by 11 AAC 96.014(b)(3) for lands closed to mineral entry by regulation. .020 allows the use of such vehicles as a generally allowed use on state land. .014(b)(3) provides for the use of motorized vehicles for purposes of accessing a mining claim in areas closed to recreational motorized vehicles.	No change.
Subsurface Resource: Impacts to fish and wildlife	The plan should include a management guideline about avoiding impacts to recreation activity and fish and wildlife resources.	It is appropriate to add of this type of management guideline to the Subsurface Resources section of Chapter 2. A change of this type will require revision of line 37, 38 on page 2-11, to include this objective as well.	Revise sentence beginning “Additional requirements Insert between the words ‘scenic’ and ‘cultural resources’” the following: “fish and wildlife”.
Materials: Inappropriate areas for materials extraction	The Willow Mountain CHA and Bald Mountain Ridge Habitat Area are not appropriate areas for material extraction and the plan should reflect this.	It is appropriate to indicate that these two areas are not appropriate for materials extraction.	After Bald Mountain-Hillside management units in line 11, p. 2-15, add as a footnote: “Except within the Willow Mountain CHA and Bald Mountain Ridge Habitat Area where

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Fish and Wildlife: definition of habitat	The HPMP definition of Habitat and the land use designation of Habitat are both inadequate. They are much too restrictive and would result in insufficient protection of the natural resources of this area. Both definitions contain the phrase ‘a permanent loss of a population or sustained yield of the species.’ Commenter recommends that the above wording in the two definitions be dropped and replace with ‘a loss of healthy and diverse local populations.’	This definition is derived from that commonly used in DNR area plans. It is inappropriate to change this definition in this plan without changing the definition that is in use in other plans, and this is not practicable. However, the definition of Habitat in the plan is not just this one sentence; rather, it includes a statement that further clarifies the habitat definition and that is somewhat close to what the commenter requested. It is: “This designation, when used, applies to localized areas having particularly valuable or sensitive habitat within the planning boundary.” No change in the definition is warranted.	they are prohibited.” No change.
Fish and Wildlife: degradation of habitat by ORV use	ORV use is unrestricted in the Hatcher Pass area and results in soil and wetlands degradation, especially in the West Side. What will the plan do to restrict further natural resource degradation?	ORV use of state land is permitted except where it is limited by regulation. In the case of Hatcher Pass, all of this area is open except for the summer seasonal restrictions at the Summit Lake SRS and the Bald Mountain Ridge Habitat Area and the year-round restrictions within all or portions of the Independence, Government Peak, and Reeds Lake-Little Susitna units. This use is subject to the standards for vehicular use on state land under 1 AAC 96.025, however, which essentially requires that this use not produce degradation of the natural environment. We are not aware of any significant degradation caused by ORV use on the East Side. The West Side has been adversely affected by summer ORV use and significant areas of tundra and wetlands have been affected. Enforcement of the standards in 11 AAC 96.025 is made difficult by the lack of field staff and citation authority; these problems can only be resolved with additional funding and additional enforcement authorities given to DMLW, both of which are unlikely. Given this, further degradation of this area is likely. The plan recommends that motorized trails be developed in the West Side, and this would help alleviate the situation, but this, too, is subject to funding.	No change.
Fish and Wildlife: Habitat information	The plan does not provide an adequate analysis of habitat in the planning area. Information related to fish and designated habitat areas should be included in the plan.	We believe that an adequate review of habitat information has occurred during plan revision and that all new, significant data has been incorporated. An important aspect of a plan revision process is to review previous information and to update it where appropriate. The updating	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>process for habitat information in this plan involved considerable staff time and resulted in changes to our current understanding of habitat in the Hatcher Pass area and in our recommendations. In the context of this plan, this involved the review and updating of ADFG data and the revision of the plan to incorporate it.</p> <p>The level of analysis conducted for the fish and wildlife habitat component was similar to that of other DNR management plans. All secondary sources of information were reexamined, and these were further augmented through discussions with the various components of ADFG that are responsible for wildlife and fisheries. Each of the previous plan sections that dealt with fish and wildlife were reexamined and updated.</p> <p>This information was, in part, also used in the assignment of land use designations to the management units. Several specific management areas were also identified.</p>	
Fish and Wildlife: In-Stream Flow Reservation	There should be a separate section on in-stream flow included. Without this section, water quantity and quality could not be protected. Public water supplies would be compromised.	<p>In-stream flow reservations, by themselves, do not function to protect water quantity and quality within an area. At most, they contribute to an overall strategy for this type of protection. In this plan, effective protection is provided by the limited number of uses that will be authorized in the Hatcher Pass area in the future. This control is exercised through Table 2-1 and 3-1. All authorizations identified in these tables must be approved by DNR and uses that are identified as 'prohibited' cannot be authorized without a plan amendment.</p> <p>The protection of water quantity and water quality is primarily accomplished through the land use designations and controls included in the plan. The aforementioned tables limit the number and kind of future uses to those that are compatible with recreation and mining. In large part, this means that only uses related to utilities and public facilities will be authorized outside of the Government Peak area. More intensive uses are allowed in Government Peak, but development in this area will be preceded by the preparation of a master development plan, which should resolve issues related to water quality and quantity.</p> <p>That said, DNR will add a new section to Chapter 2 entitled 'Water Reservations', to address issues related to in-stream flow. This section is included as Attachment A.</p>	Add in-stream flow section to Chapter 2, as described in Attachment A. Note: This addition is entitled 'Water Reservations' instead of 'In-stream Flow' since this more properly describes what is being accomplished.
Fish and Wildlife: Water	Water resources are not adequately	Water resources were not addressed in the plan for two reasons: a	A description of how water resources

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Resources	addressed in the plan. Much of the Valley water comes from the Talkeetna Mountain area. Planning for future water reservoirs and protection needs to be addressed in the plan.	<p>management guideline was included in the Fish and Wildlife section of Chapter 2 that was thought to be sufficient and the change in management direction and allowed uses in the 2010 plan provides for this protection. It did not seem necessary to describe the link between the land uses now being authorized in the revised plan to water resources. However, the plan will be revised (In-stream Flow section) to describe the way the plan protects water supply.</p> <p>Water recharge is believed to be derived particularly from Arkose Ridge and the southern flank of Bald Mountain. These areas are protected by land use designations (Public Recreation and Habitat), management intent (retain current natural character), and the requirement that state land be retained in state ownership. The land use matrix (Table 2-1) also constrains the type and intensity of uses that could occur in these areas (essentially no development is allowed.) The water resources within the planning area are adequately protected.</p> <p>It is beyond the scope of a plan of this type to identify future water reservoirs. However, since state is to be retained, the opportunity for reservoir development will be retained.</p>	will be protected in the future within the planning area will be included in the in-stream flow section that is recommended (see above).
Recreation: East/West Split	Considerable public testimony has been received attesting to the need to rebalance the areas open to motorized use in the Hatcher Pass area. Under this proposal, the East Side would be converted to non-motorized use only while the West Side would be designated for motorized use. This approach, according to its advocates, would simplify enforcement, reduce public safety conflicts, and create a simple management scheme for the Hatcher area that the public could easily follow.	<p>This approach has much merit since it would provide a simple, easy to manage approach to motorized use in the Hatcher Pass area. It would be easily implemented, would be relatively easy to enforce, and would effectively reduce much of the current conflicts between motorized and non-motorized use on the more heavily used areas on the East Side.</p> <p>Against this, however, is the reality of significant <i>winter</i> motorized use in the East Side for at least 30 years. This use has occurred throughout this area except for portions (but not all) of the areas closed to motorized use under 11 AAC 96.014(b)(3).</p> <p>DNR generally manages state land to encompass a wide variety of uses and activities. This concept derives from the Constitution that views the state's land as land that is owned by the citizens of the state and as intended to be used for a variety of beneficial purposes. These concepts are pertinent to state land use plans as well and the intention of such plans is to make state land available for a full range of public use to the extent that it is consistent with the needs of public safety and with state statute and, specifically, with AS 38.04.200. The latter precludes DNR from closing an area to motorized use (actually traditional modes of access) for</p>	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>‘aesthetic values.’ Our authority to close is limited to public safety, areas less than 640 acres (and, obviously, this does not apply), and where a popular pattern of recreation has not been established.</p> <p>It is arguable that DNR has the authority to close areas to motorized use where there is an apparent or potential public safety problem , or that occupy discrete areas, but we do not have the authority to close the entirety of the East Side, encompassing over 69,000 acres of state land, where popular patterns of winter use have been established. Research conducted during the preparation of this plan indicated that winter recreation occurs pretty much throughout the East Side. DNR does not have the necessary authority to close such a large area, but even if we had, the effect of this action would be to disenfranchise many citizens from areas used for motorized recreation for many years. It would simply not be fair to do so.</p>	
Recreation: North/South Corridor on Borough and State Land (Government Peak)	Considerable public testimony has been received on this issue as well, with many supporting the proposal to create a north-south corridor that would begin in or near private land in the south by Edgerton Parks area, continue in a northerly direction on what is called the Carle Wagon Road, thence turning westward, following the south side of Fishhook Creek until crossing that creek and connecting with the Fishhook Parking Lot and the current east-west trail. The purpose of this corridor would be to provide easy access from current residential areas to the open spaces of the West Side. This proposal has varied over time but the most recent version was for a winter (only) route. This analysis assumes winter use only.	<p>This route would start on borough land and would continue for some distance on borough land before entering state land near Fishhook Creek. Because of its initial location, the focus of the discussion of this issue has been with the borough Assembly. They recently (May 4, 2010) defeated a resolution that favored the creation of this route.</p> <p>Given the borough’s position of this facility and the need to use borough land for portions of the route, DNR will accede to the borough’s decision and will not include a north-south winter motorized route in the plan, although it will be amended to include the concept of step-wise development of a motorized corridor under certain conditions. See following response for detail. The plan does not provide for a north-south route and therefore no amendment of the plan is necessary.</p>	No change. (The PRD does not mention the proposed North/South Corridor route)
Recreation: East/West Corridor on Borough and State Land (Government Peak)	Considerable public testimony was received on the issue of the creation of an east-west motorized corridor route as well. This route would occur	An east-west corridor was a tentative recommendation by the Mat-Su borough in the draft plan. Since that time, the Mat-Su Borough Assembly passed a resolution (no. 10-036) which recommended to DNR that that the Government Peak management unit be managed	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	within the southern part of the borough land in the Government Peak unit. It would eventually connect to trails to the west and east.	<p>for non-motorized recreation without any motorized corridors through it.</p> <p>Nonetheless, the final plan provides the borough with the option of developing an east-west trail, extending to the west, across their land, which would ultimately connect with a proposed Schrock Road trailhead (or alternate location) on state land, emanating north from there on state land. This provision will allow the borough to remain consistent with this management plan should they choose to develop a motorized corridor at a later date.</p> <p>Note: The state is retaining the recommendation for a “west-east” corridor across the southern Bald Mountain/Hillside Unit, which would terminate on the borough land boundary.</p>	
Recreation: North/South Corridor on State Land (only) (Government Peak)	For the most part, public testimony on the east-west motorized corridor focused on the issue of a corridor that would begin on borough but would then continue on state land, generally following the Fish Creek drainage on its south side and eventually crossing the creek to intersect the road and the Fishhook parking lot. Towards the end of the review period, however, several comments indicated an interest in developing an east-west corridor on state land solely. This would require the development of a parking lot on Hatcher Pass Road where it intersects Fishhook Creek and earthwork to reconfigure access up the creek to the higher plateau that abuts this creek further to the west.	<p>This variant alternative would require major fund expenditures for both the parking lot and the earthwork required at the east end of Fishhook Creek for the establishment of a motorized trail constructed to sustained trail standards. The purpose of this alternative would be to get snowmachiners to the existing east-west corridor situated north of Hatcher Pass Road that connects the Gold Mint parking lot with the Fishhook parking lot and thence to the West Side on the current route adjoining Hatcher Pass Road on its north side.</p> <p>Given the strong interest for the creation of additional winter motorized access to the West Side, this approach has merit but it needs to be compared to the fairly straightforward approach of enlarging the current parking lots and creating a new one at Archangel. Essentially this approach would enable improved access to the West Side using existing (and upgraded facilities) on the East Side. This is a more cost effective solution to the problem since it avoids many of the costs that would be incurred with the construction of both a parking lot and motorized trail at Fishhook Creek. It builds on existing facilities rather than creating a new set of facilities that would be costly to develop and difficult to manage.</p> <p>A slightly different approach to this would be to utilize the above solution and, should this be insufficient in terms of meeting demand or safety considerations, construct a motorized corridor along the south side of Fishhook Creek on state land which could also include integration with a North South Corridor on borough land, if the</p>	Revise text to indicate that the parking lots (existing and proposed) on the East Side be enlarged to support motorized use within both the West and East Sides in addition to general increases in demand or for safety reasons Include the concept of step-wise development with the creation of a corridor along Fishhook Creek if warranted which would also include integration with a North South Corridor on borough land, if the latter is determined appropriate by the borough in the future. Access connections from the Fishhook Creek route on state land to a North South Corridor (on borough land) would be part of this corridor system. Space for this corridor is to be reserved.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		latter is determined appropriate by the borough in the future. Access connections from the Fishhook Creek route on state land to a North South Corridor on borough land would be necessarily part of this corridor system. Space for this corridor would be reserved.	
Recreation: Alternative Winter Use Option	This option was developed through discussions with focus groups that consisted of motorized and non-motorized use representatives. It is described at length in Chapter 3 for the Archangel and Reed Lakes-Little Susitna management units. Essentially, it would open the Reed Lakes-Reed Creek corridor in the area that is now closed to year-round motorized use, convert the Archangel Road to non-motorized use, and close to motorized use two areas that experience substantial conflicting use (Marmot Mountain and Delia Creek). The effect of this action would be to open up substantial new areas to winter motorized use and close areas to motorized use now experiencing conflicts. Map 2-4 in the PRD depicts this alternative.	<p>We concur that this alternative provides a variety of benefits and, in fact, the final recommended alternative is based on the approach outlined in the Alternative Winter Use Option.</p> <p>The recommended approach, depicted in the Adopted Plan Map (November, 2010) is basically the same in that the non-motorized area east of Reed Creek is retained and Archangel Road is converted to non-motorized use (to this small stream crossing). The non-motorized area of Marmot Mountain is extended slightly northward, to coincide with this stream crossing. It differs, however, in that it retains the Reed Lakes area as a non-motorized area. There is considerable public concern that the expansion of the motorized area into Reed Lakes would significantly improve access further north, affecting this area and the area of the mountaineering huts situated in the High Glacier Peaks unit.</p> <p>The area that would be opened occurs between Archangel Road on the west and the limits of vegetation adjacent to Reed Creek on the east, and between the area just west of Goodhope Creek on the north and the Gold Mint parking lot on the south. It converts this area from a non-motorized to a motorized area. The purpose of which would be to provide easy access to novice and intermediate terrain for snowmachining. There are no such areas in the East Side, which has presented problems in that novice and intermediate users are only able to utilize the West Side. The effect of this opening is also to provide an additional area for snow machine use within the bowl that is occupied by Goodhope Creek. This area is now open to snow machine use but cannot be readily accessed because of the current winter closure of the Reed Creek area.</p> <p>The areas that would be closed to motorized use are situated at Marmot Mountain and along Delia Creek. Closure of these areas will enhance enforcement (since enforcement resources will be near closed areas), result in fewer conflicts between motorized and non-motorized users (especially in the Marmon Mountain area), improve public safety through decreased use conflicts, and ensure that the Little Susitna drainage is, to the extent practicable, a noiseless area.</p>	Adopt aspects of the Alternative Winter Use Option approach, as outlined in the response and as depicted in the Adopted Plan Map.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		The revised configuration was determined to be best solution to the competing demands of motorized and non-motorized users.	
Recreation: Mat-Su Borough Assembly Option (to Alternative Winter Use Option)	<p>This option would close Archangel Road to Motorized Use and open the area east of the Road between the Reed Lakes and Little Susitna. Other than this, proposal is similar to the Alternative Winter Use Option.</p> <p>The borough Assembly passed a resolution that supported this approach. It differs from the Alternative Winter option by virtue of not opening the Reed Lakes area to motorized use during the winter. This option would maintain the prohibition on summer motorized use.</p>	<p>The main difference between the Alternative Winter Use Option and this approach is the elimination of the Reed Lakes area as a motorized area. The reasons for the borough option are not explained in the Assembly Resolution that stated the borough's position and therefore no justification of this proposal is included here.</p> <p>Although this option is not adopted as depicted in the borough resolution, conceptually much of the final recommended approach in this plan is based in large part on the borough's recommendation.</p>	No change.
Recreation: Motorized Corridor – Mile-16 Unit	The PRD carried a summer motorized option that provided a corridor through the center of the Mile 16 management unit. It was included in order to gauge public support or opposition to the idea of motorized use on a designated corridor.	This corridor did not receive support from the non-motorized group or the Mat-Su Borough Assembly. The motorized group did not advocate for it either. The Fishhook Community Council voted against establishing any motorized corridors on the east side.	Delete this recommendation.
Recreation: Motorized Corridor – Archangel Unit (Summer)	The PRD carried a summer motorized corridor option along the Archangel Road. It was included in order to gauge public support or opposition to the idea.	This corridor did not receive support from the non-motorized group, Mat-Su Borough Assembly. The motorized group did not advocated for it either. The Fishhook Community Council voted against establishing motorized corridors on the east side.	Delete this recommendation.
Recreation: Motorized Corridor – Archangel Unit (Winter)	The PRD carried a winter motorized corridor option along the Archangel Road. It was included in order to gauge public support or opposition to the idea.	<p>The recommendation for a developed motorized corridor paralleling the Archangel Road did receive support from motorized recreationists. However, it did not receive support from non-motorized recreationists of the Mat-Su Borough Assembly.</p> <p>Rather than developing a corridor, the final plan recommends instead that the western portion of the Hatcher Pass Special Use Area, within the Reed Lakes/Little Susitna Unit, be open to motorized use. This open area begins at the Gold Mint Parking Lot and terminates at Good Hope Creek and is situated between the Archangel Road and Reed Creek. It ranges in width from 1/3 to 1/2 mile. An opening of the area negates the need for a developed</p>	Delete recommendation for a developed motorized corridor along the Archangel Road due to opening portions of the Hatcher Pass Special Use Area, which parallel the road, while recognizing the need for a snowmachine route on the east side of Archangel Road that expedites winter travel and improves safety.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		corridor of the type recommended by the public. However, a dedicated snowmachine route on the east side of Archangel Road, to expedite winter snowmachine use and provide a safe movement corridor is appropriate.	
Recreation: Degradation of Soils and Landscape (including wetlands)	Widespread, unregulated use of ORVs has degraded the natural environment.	<p>This issue was examined (p. 30-31) as in relates to generally allowed uses, and that response is pertinent here as well:</p> <p>“The Generally Allowed Uses, by themselves, do not result in the degradation of the soil mantle and of wetlands. There are specific standards under 11 AAC 96.025 that limit the operations of motorized vehicles. These standards provide that activities employing a wheeled or tracked vehicle must use existing roads whenever possible, that there is to be no degradation of vegetation, soil stability, drainage systems, or fish and wildlife habitat. The regulations by themselves are adequate; the problem is with those individuals who choose to use their motor vehicles in a way that is inconsistent with administrative.”</p> <p>“Ultimately, the solution to the problem of non-adherence to current standards is a change in the attitude of those that operate their vehicles inappropriately. Attitudinal change will be necessary. This plan cannot attempt to change public attitudes in a significant way but it can recommend the use of signage, continued education, and the repositioning of areas closed to motorized use closer to parking lots and roads, where enforcement is easier. All of these actions are recommended by the plan.”</p>	No change.
Recreation: Carrying Capacity Analysis	The plan should address the issue of carrying capacity and should have prepared a carrying capacity analysis.	The plan does not directly address recreational carrying capacity. This issue is not typically included in DNR area and management plans because of the inherent difficulty in establishing ‘carrying capacity’ in a recreation context since the concept of appropriate levels of use is subjective in nature, and without agreement on what constitutes an acceptable level, the concept lacks utility. In the context of Hatcher Pass, given the widely differing use patterns and attitudes towards suitable recreation patterns, the development of a consensus on what constitutes an acceptable level of use would be extremely difficult to determine. The application of this concept also depends on adequate regulatory authorities for implementation. In discussions with DNR staff responsible for regulation development, we concluded that it is questionable if DNR has the authority to effectively implement this methodology and to enforce such a system, if one were created.	No change.
Recreation: Establish	There should be limits on the amount	Generally, on general state land, DNR lacks authority to impose use	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Use Levels (or Peaks)	of visitation at peak times.	limits unless related to public safety and even then it would require the enactment of regulations to establish them and sufficient staff to enforce these limits. It is problematic if an effective public safety argument could be made and in any event the ability to enforce these types of limits would be difficult. In many respects peak limits are imposed through the (limited) capacity of the parking facilities. This is a more practical approach to the establishment of limits, if it imposition of limits is considered warranted in the future.	
Recreation: Enforcement - General	There is a lack of enforcement of motorized recreational use restrictions in the planning area and the plan does not adequately evaluate the effectiveness of enforcement.	<p>DPOR enforces the current closures of motorized uses on the East Side and, in general, is effective in doing so. Nonetheless, it is recognized that violations of the current regulations occur and depending on perspective, occur at low to moderate levels, with the amount of violation increasing with distance from the road. However, the lack of enforcement is not related to the lack of intent on the part of DPOR; rather, it is related to the availability of staff resources to effectively police all the areas that are closed to motorized use. The issues related to enforcement are addressed at length on pp. 46-47; consult these sections for more detail.</p> <p>In general, however, the plan does confront the issue of enforcement, although it does not evaluate the effectiveness of the current enforcement presence since there would not much to be gained from this exercise other than confirmation that insufficient funding exists for staffing for enforcement.</p> <p>DNR must assume that monies and staff for enforcement will be limited in the future, and that it is prudent for the plan to accept this assumption rather than assume large funding increases. We also found that it is preferable to concentrate non-motorized areas near parking lots and the road system where there is an enforcement presence. The plan recommends realignment of these areas so that the DPOR enforcement presence is maximized. There are other instances where the plan deals with enforcement issues, including the revision of the current agency management agreements involving roles and responsibilities as well as changes to regulation to implement changes to non-motorized areas.</p>	No change.
Recreation: Public Safety	The plan does not reference public safety or mitigation efforts.	The recommendations of the plan deal in large part with the creation of safer conditions for winter recreation, especially on the East Side. When the draft plan was written it was unclear as to the final approach that would be selected as the basis for winter recreation management. The final plan will discuss the preferred alternative and will include a discussion of the public safety aspects	Include discussion of public safety in final plan.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Recreation: Public Safety	Snowmachines recreating in the same areas as non-motorized users are a safety risk. Snowmachines can cause avalanches, diminish ski trails, and create opportunity for collisions with non-motorized users. (Although not stated, the inference is that the two uses should be separated because of the inherent incompatibility of the two uses.)	<p>of this proposal.</p> <p>Many of the public responses expressed this view of the conflict between non-motorized users and snowmachiners.</p> <p>Inherent to this perspective is the belief that the two uses need to be separated in some way. An aspect of this argument is that the department needs to make a determination that the two uses are incompatible and should classify areas accordingly. A later response deals with this issue of classification (see below).</p> <p>DNR agrees that the two uses may be incompatible, but not necessarily at all times, in all situations. The uses experience incompatibility in joint use areas that are heavily used.</p> <p>The recommendations of the final plan provide for a more effective separation of users than in the current configuration and therefore much of the incompatibility that is now experienced should be abated.</p>	No change. Recommendations in the final plan relating to winter motorized recreation are believed sufficient to deal with the separation issue.
Recreation: Funding	There are no funding mechanisms in the plan for DNR development recommendations. Will any of the recommendations be funded? If so, how?	<p>DNR investigated the feasibility of developing some type of program that would generate revenue to cover infrastructure, maintenance, and enforcement expenses for the Hatcher Pass area. A number of different approaches were evaluated and all had problems of some type. The conclusion from this research was that additional monies could only be generated from parking fees associated with parking lots with sanitary facilities. This approach is now being used and a number of new parking facilities are being recommended for development where fees could be used, but the monies from a source of this type are nowhere sufficient to cover expenses of the type that are incurred by DNR in its administration of the Hatcher Pass area.</p> <p>Our conclusion is that the current means of financing – direct appropriations and utilization of federal transportation monies for road and road associated projects – will continue to be the most viable methods for the financing of improvements. It can be expected that some, but certainly not all, of the facilities that are recommended in Chapter 4 will be funded.</p>	No change.
Recreation: Public Use Cabins	The number of public use cabins should be limited and there should be more specific standards included in the plan for such facilities.	The number of public use cabins will be limited by virtue of the difficulty of developing these types of facilities and the inherent function since they access particular areas and particular features. The location of public use cabins will be determined by detailed siting analyses, which will deal with the desirability and feasibility of	Add the following as additional siting requirements: public use cabins should not be located in moose concentration areas, within 200' of major streams, in avalanche run out chutes, or intensive

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>alternative sites.</p> <p>It is appropriate to include additional siting requirements for such facilities: Public use cabins should not be located in moose concentration areas, within 200' of major streams, in avalanche run-out chutes, or in intensive public use areas. ADF&G should be consulted prior to the siting of public use cabins.</p>	<p>public use areas.</p> <p>Also add "ADF&G should be consulted prior to the siting of public use cabins".</p>
Recreation: Hunting	The plan does not state where hunting is and is not allowed.	It is not the function of an area plan to identify where hunting can and cannot occur. Determinations of this type are made by ADF&G.	No change.
Recreation: Viewshed	Viewshed is not adequately addressed in the plan. There are no specific standards in the plan related to the protection of the viewshed in the planning area.	<p>The requirements for viewshed management are described the Recreation section of Chapter 2 (p. 2-33). It requires that DNR take into consideration adverse impacts to scenic views from the Hatcher Pass Road in all authorizations issued by the Department. Uses that would significantly degrade these views are to be considered generally inappropriate, and the use of a different location is recommended. If an alternative location does not exist, it requires the use of stipulations to reduce their visual impact. The siting criteria to be used for utility lines and subsurface resources are to be employed. The 1986 plan did not specify specific standards. DNR relies on its written decision processes to resolve issues such as those associated with the viewshed.</p> <p>However, it is appropriate to recognize the specific revisions to this standard that are identified in other parts of this Response Summary in the Craigie Creek and Bald Mountain units.</p>	Change to note the slightly different requirements for the Craigie Creek and Bald Mountain management units.
Recreation: Mountaineering Huts	<p>The mountaineering huts are privately owned structures by the MCA and AAC on land they lease from the State. The mountaineering community has requested that the state restrict motorized recreational access onto their valid leases and private structures, in an effort to stop trespass and vandalism that have occurred on their property.</p> <p>The huts are important assets to the mountaineering community. Since they are private property, established for use by members of these clubs, they should only be used by people who are authorized to do</p>	<p>The State recognizes the concerns raised by the mountaineering community in reference to the damage and trespass that is occurring in reference to their mountaineering huts.</p> <p>The state does have the authority to restrict traditional means of access in order to protect private property according to AS 38.04.200(3). However, the State is not authorized to restrict 'traditional means of access' on general public land for the protection of leased property, although there are privately owned structures on the leased land.</p> <p>The State recommends that the MCA and AAC develop a security system for the protection of their huts against the any persons who are not using them with their express permission to do so.</p>	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	so. The huts are trespassed upon and broken into by snow machiners, who have utilized the huts for extended periods of time and left garbage and snowmachine equipment and supplies there.		
State Park Designation	Consideration should be given to the designation of the Hatcher Pass area as a state park.	This issue is answered in more detail in the responses for Chapter 4, Implementation. See that section for details.	No change.
Public Access: Degradation of Soils and Landscape (including wetlands)	Widespread, unregulated use of ORVs has degraded the natural environment.	This issue was examined (p. 30-31) as it relates to generally allowed uses, and that response is pertinent here as well: “The Generally Allowed Uses, by themselves, do not result in the degradation of the soil mantle and of wetlands. There are specific standards under 11 AAC 96.025 that limit the operations of motorized vehicles. These standards provide that activities employing a wheeled or tracked vehicle must use existing roads whenever possible, that there is to be no degradation of vegetation, soil stability, drainage systems, or fish and wildlife habitat. The regulations by themselves are adequate; the problem is with those individuals who choose to use their motor vehicles in a way that is inconsistent with administrative.” “Ultimately, the solution to the problem of non-adherence to current standards is a change in the attitude of those that operate their vehicles inappropriately. Attitudinal change will be necessary. This plan cannot attempt to change public attitudes in a significant way but it can recommend the use of signage, continued education, and the repositioning of areas closed to motorized use closer to parking lots and roads, where enforcement is easier. All of these actions are recommended by the plan.”	No change.
Public Access: Closure of Areas Degraded by ORV Use	Areas on the West Side that have been degraded by ORV use should be closed to such use.	While it may be possible to close areas that have been degraded by ORV use under AS 38.04.200 and 11 AAC 96.014(b)(3), actual experience on the closure of one trail (Rex Trail) in the northern region has shown that it has been difficult to close a single trail to motorized use let alone an entire area. The closure of the Rex Trail was preceded by extensive field reviews to determine where degradation occurred and the type of vehicle involved, followed by the promulgation of the closure rule, which was quite controversial. Extensive staff effort, which is always limited, was involved in this	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>effort.</p> <p>As a practical matter, it would be difficult to close an entire area to motorized use. If DNR were to undertake a closure it would have to be preceded by a careful review of our authority for an extensive closure, followed by field reviews and only then would the Department make the determination that closure was appropriate and, most likely, closure would focus on particular trails, not an entire area.</p> <p>The closure of the West Side to motorized use is an implementation action that would be undertaken by the SCRO and would occur subsequent to plan adoption, if it were to occur at all.</p>	
Public Access: Trails should be subject to seasonal closure	Trails that have been degraded by ORV use should be closed to such use on a seasonal basis. When snow cover is sufficient, they can be opened to winter use.	<p>The closure of individual trails to ORV use is a variant on the previous response that evaluated the ability of DNR to close entire areas to motorized use.</p> <p>The closure of an individual trail (or trails) require the same process as for an entire area closure and would be similar to the steps taken by DNR in the recent closure of the Rex Trail.</p> <p>DNR has the authority to close trails for public safety reasons or to ensure that further degradation of natural resources does not occur, but this action is an implementation action that would be undertaken only after extensive review and department discussion, and would occur subsequent to plan adoption.</p>	No change.
Public Access: Evaluate alternating day usage or separate trail usage	Another way to resolve the issues of motorized versus non-motorized uses in heavily used joint use areas, would be to create separate trails or to establish temporal restrictions. In temporal restrictions, an area would be devoted to motorized use on one day and to non-motorized use on another, with the uses alternating. Alternatively, this could be applied on a weekly or monthly basis.	Both concepts, separate trails and temporal restrictions, have merit and are commonly used solutions to problems of competing use within heavily used areas. The use of these methods was reviewed in the development of the recommended plan and the final plan extensively uses the concepts of user separation, both in areas and in trail design. For example, there is the separation between motorized users and non-motorized users along Archangel Road and there is the use of Archangel Road as a non-motorized route. (This road is currently a multiple use facility.) These solutions seem the most practicable way to ensure separation of users and thereby increase public safety, and the use of temporal solutions seemed unnecessary.	No change.
Public Access: Trail Construction Standards	Trails should be constructed to 'sustained trail' standards.	The plan recommends that trails be constructed to sustained trail standards.	No change.
Public Access: Classify non-motorized and motorized uses as	Motorized and non-motorized uses are inherently incompatible activities and the plan should classify them as	Motorized and non-motorized uses are not inherently incompatible, although as use increases in jointly used areas, incompatibility can	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
incompatible.	incompatible. (Although not stated, the inference is that the two uses must be separated, with separate areas for each use, similar to what is advocated as the East Side-West Side approach to management.)	<p>occur under certain conditions.</p> <p>A basic philosophy of land management on state land is that it can accommodate a variety of uses, although the use of stipulations may be necessary at times to ensure that the various uses can coexist. This also the approach that is used in this plan.</p> <p>It is not necessary to classify motorized and non-motorized uses as inherently incompatible to achieve the use separation that is sometimes is necessary for the two activities to exist in the same areas. Plan recommendations provide for a separation of uses and public safety and use issues can be resolved without resorting to the type of classification that is proposed.</p>	
Public Access: RS 2477 Routes	What are the allowable vehicle types and vehicle sizes on RS 2477 Routes?	<p>The allowable vehicle type and size on an RS 2477 Route varies according to the type of road the RS 2477 Route is today. In Alaska, RS 2477 routes may vary in size from a narrow trail to a major highway.</p> <p>RS 2477 Routes that have become state highways, which are maintained by the Alaska State Department of Transportation, allow most motorized vehicles, from motor cycles to large semi-trailer trucks, but do not allow OHV recreational vehicles. Whereby undeveloped RS 2477 routes may not be sufficient to accommodate anything larger than a snowmachine or ATV.</p> <p>In most instances, vehicle size requirements on undeveloped RS 2477 Routes generally follow the same requirements included in 'generally allowed uses' 11 AAC 96.020. Motorized use is allowable for highway vehicles up to 10,000 pounds on road easements and all-terrain vehicles up to 1,500 pounds.</p>	A brief discussion about allowable vehicle sizes on RS 2477 Routes will be included in the Public Access and Transportation section of chapter 2.
Public Access: RS 2477 Routes	Are the locations of RS 2477 Routes ground verified?	Most of the RS 2477 routes recorded in the state have not been ground verified. The locations are based on cartographic depictions on topographical maps. However, many are viewable via satellite. In Hatcher Pass, none of the RS 2477 Routes have been ground verified with a GPS Unit.	No change.
Public Access: Trail Plan	The plan does not include or recommend a trail development plan. The area needs a trail plan before a trail system is developed.	It is appropriate to include a recommendation that a trail plan be developed; this would be added to the implementation section of the plan.	Add: A trail plan should be developed. Include in Chapter 4.
Public Access: Trail Plan for RS 2477 Routes	If a Trail Plan is developed for the planning area, the RS 2477's located in the planning area should be recorded through GPS.	The plan will recommend a trail plan be conducted. The RS 2477 routes in the planning area are used for recreation as well as mining access and should be properly recorded and accurately depicted on maps given to the public.	No change; RS 2477 Trails will be an aspect of the recommended Trail plan.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Public Access: Trail Management	Plan references “Sustainable Trail Standards”, but no official Sustainable Trail Standards are available through DNR. What standards does DNR plan to use?	A sustained trails policy has been approved by DPOR and guides all trail development and design. Although a design handbook is still in preparation, it is expected to be completed in 2011 and will become the basis for trail design and development within the department for recreational trails.	No change.
Public Access: Trail Grooming	Who pays for Nordic Ski Trail grooming? Snowmachiners do not want their registration fees to be used for ski trails.	The grooming of Nordic ski trails is typically paid for and performed by recreational ski groups and volunteers. They are not paid for through government funding. However, some trails have been paid for through grant funding. Snowmachine registration fees are directed to the SnowTRAC program for the purpose of developing and maintaining snowmachine trails as well as the administrative costs associated with the program. Snowmachine registration fees are not utilized to cover the costs of trail grooming in areas closed to recreational motorized use, including Nordic Ski trails. Registration funds may be used for multi-use trails that are open for both motorized and non-motorized recreation.	A statement regarding the funding mechanisms for non-motorized ski trails will be included in the plan A statement regarding the allocation of snowmachine registration funds will be included in the plan.
Heritage Resources	There is not enough information related to heritage resources included in the plan.	The information related to heritage resources that is included in the plan was reviewed and approved by the Alaska State Historic Preservation Office. The information in the plan is sufficient to provide a historic context of the area.	No change.
Telecommunication Facilities	Communication Site recommendation should be reviewed for consistency with FCC Regulations.	Concur.	No change.
Specifics related to Implementation	The information for actual overall implementation is lacking in the plan. How will the plan be implemented? Will further regulations be drafted and when?	The plan adequately explains the steps necessary to implement the plan. This information is contained in Chapter 4, which deals with plan implementation. Chapter 4 presents the steps necessary for plan implementation at length. Recommendations are made for changes to regulations, management agreements, land classification orders, mineral orders, and the like. Further, many of these recommendations are self-executing in the sense that they will be enacted with the plan. For example, Tables 2-1 and 3-1, which deal with authorized-prohibited uses on an areawide basis and for the Government Peak unit, will be implemented as part of the issuance of authorizations by DNR in the future. The land classification and mineral orders will also be implemented with the adoption of the plan, among other implementation measures. With respect to the implementation of regulations, changes to the	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		existing regulations under 11 AAC 96.014(b)(3) are recognized as necessary and are included in Appendix D. They, or something similar to them, are intended to be implemented immediately following plan adoption by DNR.	
		CHAPTER 3: MANAGEMENT UNITS	
KASHWITNA RIVER DRAINAGE			
	Why was this area added to the Hatcher Pass Management Plan? If it is added to the plan area, it will be subject to additional restrictions, which are unnecessary.	This area was recommended to be included in the Hatcher Pass Management Plan on the basis that the public is actively using this area (previously it had not been used) and that this use is related to the Hatcher Pass area, not to the management area of the Susitna Area Plan, which now includes this unit. No additional restrictions are recommended for this area in the plan. Generally allowed uses apply within this area, and no restrictions to these uses are proposed in the plan.	No change.
WILLOW MOUNTAIN			
Resource Degradation from Summer ORV Use	Significant natural resource degradation has resulted from the improper use of ORVs in this unit during the summer. This area should be closed in its entirety or specific trails, at the minimum, should be closed in order to ensure that further degradation does not occur.	See response under Public Access, Chapter 2, Topical Issues.	No change.
Material Sales within Willow Mountain CHA	Material sales should not occur in either the Willow Mountain CHA or the Bald Mountain Ridge Habitat Area.	Concur.	Identify material sales as a prohibited use in Table 2-1 under Material Sales within the Willow Mountain Critical Habitat Area.
RS 2477 Routes in the Willow Mountain CHA	RS 2477 Routes in the Willow Mountain CHA are not well marked and motorized recreationists do not stay on them in the summer. The trails should be ground proofed and have proper signage.	The locations of the trails have not been recorded with GPS. As stated above in the "Trail Plan" section, RS 2477 trails will be recommended for inclusion as an aspect of the Trail Plan. Better signage will also be recommended.	No change; issue is deferred to the Trails Plan, which is recommended for preparation.
Snow Fall Depth Requirements	Snow fall depth requirements for use should not be implemented in the Willow Mountain Unit.	Snowfall requirements will not be implemented in the Willow Mountain Unit or any west side management units.	No change.
Line By Line Analysis			
Page 3-20 Line 39	Willow Mountain should be developed as a motorized use area	The proposal for the east-west boundary has been recommended to the state as an option for separating motorized and non-	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	and the eastern boundary should be the dividing line for an east/west split.	motorized recreational uses. This issue is discussed above under “area-wide policy issues” relating to Recreation in Chapter 2.	
HIGH GLACIER PEAKS			
Mountaineering huts: inappropriate use	Mountaineering Huts: snowmachiners are making illegal use of these huts. They need better protection. There should be an area around the huts where motorized use is prohibited.	<p>A pattern of regular winter recreation use has been established in the High Glacier Peaks unit, and, under AS 38.04.200, DNR is constrained from closing this area to a traditional means of transportation when such a use has been established.</p> <p>However, it is possible to close areas around the huts, up to 640 acres. DNR is reluctant to do this, however, and prefers to tighten the conditions of the existing authorizations to preclude the illegal use that may be occurring. This action will be implemented by SCRO and is a much simpler, more expedient solution than the institution of a new regulation.</p>	No change.
Close HGP to Winter and Summer motorized uses	Winter and summer motorized use should be prohibited in this management unit. The environment of this unit is typically fragile and is easily prone to degradation from motorized uses.	<p>The environment of the High Glacier Peaks unit is, as described, fragile and vulnerable to inappropriate motorized use. There are constraints to the closure of this area to motorized use. See above response.</p> <p>While prohibition of winter motorized use does not seem practicable, a summer prohibition may be possible. Considerable public comment has been received on this issue; DNR advanced the concept of a summer motorized closure in the PRD and wanted to gauge public reaction. Based on this and the ability to close this area now to motorized use, the summer closure option should be revised and identified as a recommended change to the generally allowed uses within this management unit during the summer months. The final plan will incorporate this recommendation.</p>	Revise Generally Allowed Use of management guidelines to identify summer motorized use as an inappropriate use. Revise the proposed changes to the regulations to identify summer motorized use as a constrained use. (Essentially this means that the regulations would be revised to drop summer motorized use as a permitted use. However, all other aspects of the Special Use Designation would affect this area.)
CRAIGIE CREEK			
Management Intent for Craigie Creek	Mining has been an important historic use in the Craigie Creek unit and this is recognized by the co-designation of this unit as Public Recreation - Dispersed and Minerals. However, the plan does not include in the management intent statement language a recognition of the importance of this use, similar, for example, to the language used for the Independence unit.	It is appropriate to add a management intent statement for mineral exploration and development for this unit.	Revise management intent statement to: “This management unit will be managed primarily for its mineral resources and for recreation, with emphasis on motorized recreation”. “Continued mineral entry and development are authorized in this unit.” Additionally, add: “State review of a plan of operations for mineral development will be reviewed consistent with the guidelines in this

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
			unit so that the development minimizes affects on scenic resources and recreation.”
Lucky Shot Mine	The plan does not discuss the Lucky Shot Mine. (See Sub-Surface Resources)	A short description of this mine will be included in the final plan.	Include a short description of mine in final plan.
Mining Claims	There are a number of mining claims in the Craigie Creek Unit that are not depicted on the map. Why aren't they depicted?	Mining claims change frequently over time, depending of on claimant interest and their ability to meet state regulatory requirements, and so their depiction in a plan is a snapshot in time. Management plans of this type do not typically depict state mining claims for this reason. Instead, the plan indicates the presence of claims in general areas and includes a reference to Alaska Mapper, a resource database that, in part, depicts such claims. This information is updated annually and is a much more accurate in identifying the status of claims. See p. 2-10	No change.
Mining Authorizations	The current wording does not recognize the current mining uses in this unit and the current requirements would have the effect of precluding further mining and mineral development.	Concur. Replace the current management requirements with the following: “Plan of operations for mineral development on state land should be authorized to minimize negative impacts on recreation, taking into account the environmental and economic requirements of the mineral development. To do so, authorizations for mineral development should consider methods to minimize visual impact including use of topography and vegetation, if practical, for screening facilities from view; and should consider grouping or locating facilities to minimize visual impact or to avoid blocking access to public land.”	Revise plan: Include the revised wording for both the Craigie Creek and Bald Mountain units.
Mining Standards	Mining development in this unit would be precluded or severely hampered by the two management requirements under the management guidelines related to Mining.	Although DNR does not believe that the mining standards in Chapter 2 (that are referenced in the management guideline for subsurface resources) would have the effect of precluding or impairing mining and mineral development, these standards can be restated and shortened and still accomplish the same objectives.	Delete first management guideline under Mining and revise the wording of the second guideline to: “Authorizations issued by DNR are to be consistent with the management guidelines for subsurface facilities in Chapter 2. Utility lines internal to mineral development – that are solely used by a mineral project – are also to comply with these guidelines.” Note: the mining standards for the Bald Mountain unit would be similarly affected.
Craigie Creek Road	This trail is not suitable as a multi-use recreation trail because it is used for mining access. An alternate route should be recommended for	Craigie Creek Road is used primarily for recreation purposes to access the Craigie Creek Valley and adjoining backcountry areas. It is also used for mining access, but most of this access is likely to occur near the beginning of this road where further development of	Revise plan to indicate that realignment or relocation of the Craigie Creek Road should be investigated in the plan of operations review for the mine.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	development.	Lucky Shot Mine is anticipated in the near future. A more reasonable approach would be to relocate or realign this section to accommodate both mining and recreation interests. The need to investigate road relocation or realignment will be noted in the final plan as an aspect of plan of operations review.	
Craigie Creek Parking Lot	The parking lot depicted on the maps is not in a suitable location. It should be located elsewhere.	The final decision for the location of the parking lot will be made at an operational level after funding has been allocated for the project.	No change.
Viewshed	The Lucky Shot Mine is located immediately adjacent to the Hatcher Pass Road and cannot be effectively screened from this road.	Correct; it would be impossible to screen a mining structure from view from the Hatcher Pass Road from this location. Delete this requirement as it pertains to mining operations in this management unit and Bald Mountain / Hillside Unit.	Delete mining from the first management guideline under Viewshed Protection. Retain this requirement for material extraction. Note: The viewshed management guideline for the Bald Mountain unit would be similarly affected.
Utilities	The management guideline for Utilities for this unit is unworkable and needs to be replaced with a more practical approach, given the costs of undergrounding and the geologic constraints to digging (bedrock is close to the surface in most locations.)	This issue has been addressed previously in the Chapter 2 section on the placement of utilities and revision to portions of the current wording is recommended. Accordingly, clarification of the utility requirements in this management unit is necessary.	Delete first management guideline under Utilities (lines 3, 4) and replace the second guideline with the following: "Utilities are to meet the requirements for such facilities described in the recreation and public access sections of Chapter 2. " (Notes: Corresponds to the revisions noted previously in Chapter 2 of this Issue Response Summary. This change also affects the Bald Mountain unit.)
BALD MOUNTAIN / HILLSIDE			
Communication facilities	Communication facilities should not be situated on Bald Mountain. (Presumably, because this would compromise scenic views.)	The plan discourages uses that would be visible from Hatcher Pass Road and that would detract from the views from this road. See 'Utilities, Communication, and Related Facilities' on p. 2-39. However, in some cases there may be no other viable option for communication facility siting, and this consideration must be taken into consideration in the written decisions prepared by DNR. This more flexible approach to the siting of communication facilities is considered more appropriate.	No change.
Use of an RS 2477 Trail as a Motorized Corridor	The Wet Gulch Trail (RST 1710) runs directly through the Bald Mountain Ridge HA. The exact location of the trail has not been recorded through	The improvement of this trail is recommended in the plan. Prior to improvement, the trail will be recorded via GPS. The approximate location as depicted on the plan maps is adequate for preliminary planning purposes.	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	GPS and is not known. It should be recorded before any developed corridor is planned.		
Schrock Road as Motorized Corridor Into the Bald Mountain Unit	The plan recommends that Schrock Road be used as a motorized corridor into the planning area. This road is surrounded by private properties and ends before it reaches the plan boundary. Will the State be extending Schrock Road?	The plan recommends a parking area at the terminus of Schrock Road, which would be located on state land. The terminus of Schrock Road intersects the Wet Gulch Trail, an official RS 2477. It is the RS 2477 Trail, which currently allows for public access through state law, not Schrock Road that would be developed as a corridor into the planning area.	Revise wording to reflect that the RS 2477 Trail, not Schrock Road, will be improved to accommodate motorized recreation access into the planning area.
Schrock Road as Motorized Corridor Into the Bald Mountain Unit Effects on Private Property Owners	Has DNR consulted any property owners regarding this plan recommendation?	DNR has not consulted with private property owners who may be affected by increased use	No change.
Parking lot at Schrock Road	A parking area to support motorized recreation should be constructed at the terminus of Schrock Road. Development of a facility of this type is necessary to support access to back-country areas in the West Side. A trail from borough land should connect to this and there should be trail extensions to the north.	A parking lot, with sanitary facilities, is recommended at this location. It is intended to support motorized and non-motorized recreation. See p. 3-44.	No change.
Schrock Road Parking Lot	Who will pay for the construction and maintenance of the parking lot? Will there be parking fees?	State land in this area is managed by the SCRO. DNR would be responsible for the construction and maintenance of the parking lot. There are currently no fees planned for the use of the parking lot.	No change.
Recreation: Motorized Use in the Bald Mountain Ridge HA	Motorized use should not be allowed in the summer months in the Bald Mountain Ridge HA. The stipulations in the Hatcher Pass Special Use Area say it is non-motorized during the summer. ATV's don't stay on the designated trails.	Although the Bald Mountain Ridge HA is closed to recreational motorized use during the summer months, the public access trail (RST 1710) is open year round through State regulation. Recreational users are required to stay on the designated trail during the summer months.	No change: this issue is more properly dealt with in the Trails Plan, which is recommended for preparation.
East/West Corridor (on state land) across the southern area of the Bald Mountain/Hillside Unit.	The motorized community has advocated for the creation of motorized corridors to provide access from the east side to the west side of the planning area. The Mat-Su Borough is reviewing the potential	Based on public support for motorized access corridors from the east side to the west side, this plan recommends the creation of an east-west motorized corridor across southern area of this unit to provide access from Mat-Su Borough land to state land. This corridor would serve as a connection route from the proposed Mat-Su Borough east/west corridor and extend to RST 1710, a	Add this recommendation to the plan.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	and feasibility of a motorized corridor across the Government Peak Unit and their lease area into the Bald Mountain unit for such access.	north/south corridor recommended by the state.	
Bald Mountain Ridge Habitat Area	The Bald Mountain Ridge Habitat area should not be expanded. It is too restrictive; I want to use motorized vehicles in this area and the plan prevents this.	The Bald Mountain Ridge habitat area is not being expanded. Winter motorized use is allowed in this area; only summer motorized use is limited during those periods that nesting and fledging occurs. Because of the regional importance of this area, continuation of the summer closure remains warranted.	No change.
Material sales	Material sales should not occur in either the Willow Mountain CHA or the Bald Mountain Ridge Habitat Area.	Concur.	Identify material sales as a prohibited use in Table 2-1 under Material Sales within the Bald Mountain Ridge Habitat Area.
Minerals as a Co-designation	A portion of the Lucky Shot mine is within the Bald Mountain unit. There is no management intent for mining that reflects the importance of this use in this management unit. The importance of mining in this unit needs to be emphasized to a greater degree than now described in the plan.	Concur. Add Minerals as a co-designation to this management unit, but indicate in the management intent section that this co-designation applies to the areas of historic mining and those areas with existing valid mining rights that tend to occur along Wet Gulch Creek and portions of Hatcher Pass Road. Also revise management intent to recognize the appropriateness of mining within these areas.	Revise to include Minerals as a co-designation (related to areas of historic use or existing valid mining rights) and amend the intent statement to, beginning on page 3-41, line 26: “...managed to maintain its current natural character, <u>while recognizing the importance and appropriateness of mining in areas of historic mining use and where valid mining rights exist.</u> ”
Viewshed	The mines that are located in this unit are clearly visible from the Hatcher Pass Road and there is no good way of meeting the requirement that such uses be screened from view. This issue was raised in the context of the Craigie Creek unit, but is also pertinent to the Bald Mountain unit.	Correct; it would be impossible to screen a mining structure from view from the Hatcher Pass Road from this location. Delete this requirement as it pertains to mining operations in this management unit and Bald Mountain.	Delete mining from the first management guideline under Viewshed Protection. Retain this requirement for material extraction and parking.
INDEPENDENCE			
Restricted areas along the road corridor.	The 1986 DMLW maps that depict areas closed to recreational motorized use conflict with the DPOR snowmachine trail maps. Which map should the public follow?	There are inaccuracies in both sets of maps. The public will be required to follow the boundaries and regulations based on the 2010 maps. The current DPOR snowmachine maps do not accurately reflect the closures. The southwest area of the Independence Unit is not open to recreational motorized use.	No change.
Snowmachine Trail along the Hatcher Pass Road	This trail was created for snowmachine users, however, they	The east-west trail along the Hatcher Pass Road was created for snowmachine users as an access route to the west side. However,	No Change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	go off the trail into the non-motorized areas of Government Peak and it creates safety concerns. Will enforcement of this trail be enhanced?	<p>only the Independence Unit was restricted at the time of its creation. The boundaries of the closure are difficult for the public to determine from the ground.</p> <p>In the revised plan, the southern Marmot Mountain Area is recommended for closure during the winter months and maintains the closure of most of the Independence Unit. The area parallels the northern side of the east-west corridor and extends from the Archangel Road to the Independence Road. The closure of this area will make enforcement of the corridor easier for rangers.</p> <p>Enforcement is carried out through education (signage), ranger presence and self policing. The plan recommends additional signage along the road corridor to inform the public of this closure.</p>	
Independence Mine State Historic Park	The plan calls for a number of recommendations for the IMSHP, however, it was closed for the summer 2010 due to lack of funding. Will it be reopened in the future?	<p>DPOR develops its budget for the South-central and Copper Basin areas on an annual basis. At the time of budget preparation the costs of operation are assessed against project revenues and other financial resources and, if revenues are insufficient to cover costs, difficult decisions involving facilities and personnel are made by DPOR.</p> <p>Because of the uncertainty over future costs and revenues, no commitment can be made in this plan or by the Department on the reopening of the state historic park. There has been no decision on keeping the site closed in the future either.</p>	No change.
ARCHANGEL			
Archangel Bridge	Archangel bridge is in bad shape and should be replaced with a new, larger bridge to accommodate traffic.	The plan acknowledges the poor condition of the bridge and recommends that it be upgraded to safely accommodate motorized vehicles (Page 4-13). However, the upgrade is subject to funding and availability.	No change.
Archangel and Fern Mine Roads	Archangel and Fern Mine Roads are very difficult to drive on. There are numerous ruts and deep pot holes throughout. The road should be improved for safety.	<p>This is an ADOT maintained road during the non-winter months. Although the road is in need of improvement, the repairs are subject to the funding, availability, and prioritization of ADOT.</p> <p>We agree, however, that the plan needs to state that these two roads require improvement.</p>	Add recommendation to improve Fern Road, subject to funding availability. (The plan currently recommends the improvement of Archangel Road.)
Marmot Mountain Closure – Year Round	The Marmot Mountain area should be closed to motorized recreation use year-round.	Based on comments received from the public and the recommendations in the Mat-Su Borough Assembly Resolution No. 10-036, the final plan recommends the closure of an area , (approximately 750 acres), in the Marmot Mountain area on a year-round basis, primarily for public safety during the winter. The entire unit is recommended to be closed to summer motorized use, which includes this area. Because only portions of this unit are	Revise plan text in Chapters 2 and 3, and plan maps, to reflect the revised recommendation, and as depicted in Adopted Plan Map. Also revise regulations (11 AAC 96.014(b)(3).

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>intended to be closed to winter motorized use, it is inappropriate to close the entirety of the unit on a year-round basis. However, it is appropriate to convert the area that is to be closed to winter recreation use in the Adopted Plan Map to a year-round closure. See discussions that follow for more detail on the winter and summer closures to motorized use.</p> <p>Changes to the boundaries of the current regulations under 11 AAC 96.014(b)(3) will be necessary and the plan recommends these changes as well. The affected area is depicted on Adopted Plan Map.</p>	
Marmot Mountain Closure – Winter Option	The Marmot Mountain area should be closed to motorized recreation in the winter.	<p>Concur. Based on comments received from the public and the recommendations in the Mat-Su Borough Assembly Resolution No. 10-036, the final plan recommends the closure of an area of approximately 750 acres in the Marmot Mountain area during the winter for public safety. (In fact, the closure is designated as year-round closure, as described above.) The affected area is depicted on Adopted Plan Map. The intended effect of this change is to separate motorized from non-motorized users in a highly used area and thereby provide separation between users, which should contribute to increased public safety.</p> <p>It is also recommends that the regulations for the planning area should be revised to include the closure of this area. (See above discussion on the closure of the Archangel Unit).</p>	Revise plan text in Chapters 2 and 3, and plan maps, to reflect the revised recommendation. See Response. Also revise regulations (11 AAC 96.014(b)(3)).
Winter Motorized Corridor along Archangel and Fern Mine Road	The Archangel and Fern Mine Roads are currently multi-use and there are strong safety concerns for all users during the winter. Will there be a motorized corridor built along the road to separate the users for safety?	<p>The current multi-use of the Archangel and Fern Mine Roads by motorized and non-motorized user has resulted in public safety concerns. Based on public comment and the recommendations from the Mat-Su Borough Assembly Resolution 10-036, this plan recommends that a roughly 2.5 mile section of the Archangel Road be converted to non-motorized use during the winter.</p> <p>The area of non-motorized use during the winter extends north from the Archangel and Hatcher Pass Road intersection to the small creek crossing just south of the unimproved parking lot at the Reed Lakes Trailhead, near the Fern Mine Road turnoff. Crossing near the southern terminus for the snow machine corridor that emanates from the Gold Mint parking lot is allowed. See Adopted Plan Map.</p> <p>Rather than constructing a developed motorized corridor, the plan recommends the opening of the southwestern area of the Hatcher Pass Special Use Area to motorized recreation in the winter. (See</p>	Revise plan text in Chapters 2 and 3, and plan maps, to reflect the revised recommendation.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		above discussion). The Archangel and Fern Mine Roads are ADOT managed roads during the summer and OHV's are restricted during the summer through state regulation (13 AAC 02.455).	
Winter Non-motorized Corridor along Archangel and Fern Mine Roads	The Archangel and Fern Mine Roads are currently multi-use and there are strong safety concerns for all users. Will there be a non-motorized corridor built along the road to separate the users for safety?	The current multi-use of the Archangel and Fern Mine Roads by motorized and non-motorized users has resulted in public safety concerns. Based on public comments and the recommendations from the Mat-Su Borough Assembly Resolution 10-036, the final plan recommends that the Archangel and Fern Mine Roads be designated for (and converted to) non-motorized during the winter. See also above discussion on a winter motorized corridor.	Revise plan text in Chapters 2 and 3, and plan maps, to reflect the revised recommendation.
REED LAKES/LITTLE SUSITNA			
Extension of Regulatory Boundaries	The proposed winter motorized closures in the Reed Lakes-Little Susitna management unit should be extended to encompass the entirety of the valley itself. This would alleviate problems now being encountered with illegal use in the Special Use Area and the noise that is generated by that use.	It is unnecessary for the entire Reed Lakes-Little Susitna Valley to be closed to motorized use. Most of the problem that is being encountered occurs on the south side of Little Susitna Valley. The proposed boundaries identified in Map 2-3 are generally sufficient on the north facing slopes in this area but probably should be extended further southward to encompass a larger area, to preclude illegal snowmachine use and provide separation between motorized and non-motorized users, which should improve public safety.	Extend the southern boundaries of Map 2-3; revised boundaries are depicted in Adopted Plan Map.
Alternative Winter Use Option (Also described final plan recommendation)	<p>Alternative Winter Use Option. Extensive public comment was received on this issue, both for and against. Under this option, the area generally north of the Gold Mint parking lot within the existing Special Use Area would be opened to winter motorized, although it would remain closed to such use during the summer. In addition, the area of and around Delia Creek, situated south of the Gold Mint parking lot would be closed to motorized use on a year-round basis.</p> <p>The borough assembly also provided its recommendation on this option. They delineated a somewhat smaller area, deleting the area of Reed Lakes, while maintaining access into Good</p>	<p>See Public Access, Chapter 2, for a detailed discussion of this issue. Also see the discussion on Delia Creek that follows. The response described here focuses on the area within the current Special Use Area north of the Gold Mint parking lot.</p> <p>The final plan blends aspects of the original proposal depicted in Map 2-4 in the PRD and the recommendation of the borough assembly as it relates to this area. The final plan recommends that the area west of Reed Creek, which is generally flat and easily accessible from the Gold Mint parking lot be opened to winter motorized use. The affected area is depicted in the Adopted Plan Map. It would extend from the Gold Mint parking lot north to an area of topographic restriction near the unimproved parking lot on Archangel Road that is now used for summer access to the Reed Lakes Trail. Under this option, Archangel Road converts to non-motorized use (only) during the winter. The Adopted Plan Map depicts the final plan recommendation.</p> <p>This option was selected since it provides an area of generally flat to moderately sloping terrain for novice and intermediate snowmachiners on the East Side (one does not exist currently).</p>	Revise draft plan to designate an area of winter motorized use in the area north of the Gold Mint parking lot and east of Archangel Road, as depicted on Adopted Plan Map. Maintain the summer closure of this area, however. Changes to 11 AAC 96.014(b)(3) are also recommended, to implement this revision.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	Hope Creek.	<p>Combined with the conversion of Archangel Road to non-motorized (winter) use, this effectively separates non-motorized users from motorized users. This should resolve the current conflicts between these two uses on Archangel Road and, combined with the closure of the Marmot Mountain area, should provide areas for non-motorized use close to parking lots and roads. This will result in improved public safety and better enforcement.</p> <p>The area north of the proposed closure, as depicted in Plan Map 2-4, was dropped in response to public comments, which were uniformly opposed to the opening of this area during the winter. This area had been included previously to provide access to a larger area and because of the then believed inability by DPOR to enforce a non-motorized area north of the north closure point. Based on field reviews conducted during the summer of 2010, staff now believes that topographic features and signage should be effective in precluding access to areas further to the north.</p> <p>If significant (winter) incursions from the Reed Creek Valley affect the area closed to winter motorized use in the Reed Lakes area, or closed sections of the Archangel Road, this recommendation and corresponding regulations will be reevaluated to determine if it is appropriate for the Reed Creek Valley to remain open to motorized recreation.</p>	
Delia Creek Winter Closure	Delia Creek winter motorized closure. Snowmachiners access the non-motorized Hatcher Pass Special Use Area along the north side of the creek. This issue is different from the Winter Use Option in that the closure would not depend and be related to the implementation of the Winter Use Option, but would be a distinct, separate closure.	<p>An area surrounding Delia Creek was identified for winter motorized closure as part of the Alternative Winter Use Option described in the PRD. However, this area was brought up extensively during the public focus group meetings in 2009 and in comment by non-motorized groups on the 2010 PRD.</p> <p>There is adequate justification to designate this area as non-motorized during the winter, but it is preferable to designate an area of less than 640 acres as non-motorized on a year-round basis. The addition of Delia Creek is essentially an expansion of the current year round regulatory closure along the Little Susitna drainage, and it preferable to treat it in a similar manner because of like characteristics and to avoid confusion in enforcement. There is limited winter motorized recreation taking place along Delia Creek, as it mainly serves as an access point into the Hatcher Pass Special Use Area, which is closed to motorized recreation.</p> <p>Because this closure abuts the current special use designation and this closure is on a year-round basis, it is appropriate to designate</p>	Revise draft plan to include year-round closure of area less than 640 acres around Delia Creek, as depicted in the Adopted Plan Map. Changes to 11 AAC 96.014(b)(3) are also recommended, to implement this revision.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		an area of less than 640 acres along Delia Creek as non-motorized on a year-round basis. The affected area is depicted on Adopted Plan Map. Current regulations should be revised to include the closure of this area.	
Delia Creek Year Round Closure	See above discussion on the winter closure of Delia Creek.	See above discussion. Designate an area of less than 640 acres along Delia Creek as non-motorized on a year-round basis. The affected area is depicted on Adopted Plan Map.	Update plan to include year-round Closure of area less than 640 acres around Delia Creek, as depicted in the Adopted Plan Map.
Mat-Su Borough Assembly Use Option Resolution	The Mat-Su Borough Assembly passed a resolution very similar to the Winter Use Option. Does this mean the State will be required to follow the Winter Use Option, rather than the Base Recommendation that keeps the Reed Creek and Lakes area closed?	The state considers recommendations from local unit of government carefully, since they are close to the public and have a good understanding of what the public wants (and does not want). Nonetheless, DNR is not constrained from selecting an approach that differs from that recommended by the local unit of government. The final plan recommendation is similar to but not identical to the borough assembly recommendation.	No change.
Little Susitna Road Corridor Closure	Why is this area being recommended for motorized use restrictions? There is currently no motorized use taking place and there is not any reported public safety or environmental degradation issues.	This closure was a recommendation from the Mat-Su Borough. The justification was to protect their lease area from motorized recreation interference by precluding motorized use, which has the potential to cause safety hazards, should motorized users choose to cross the road from the area. Although there is no public support for the closure, the recommendation is being carried in the plan at the behest of the borough.	No change.
Mining Claims located along the Little Susitna River	There are mining claims located along the Little Susitna River. Why aren't they depicted on the maps?	Mining claims change frequently over time, depending on the interests of the claimant and state regulatory requirements. Management plans of this type do not typically depict state mining claims for this reason. Instead, the plan indicates the presence of claims in general and includes a reference to Alaska Mapper, a DNR resource database that depicts such claims. This information is updated annually and is a much more accurate in identifying the status of claims. See p. 2-10.	No change.
Recreation: Motorized Winter Corridor	This corridor was recommended as part of the 'Winter Option' to alleviate public safety concerns on the Archangel and Fern Mine Roads.	This corridor was recommended as part of the 'Winter Option'. This option proposed the development of a motorized corridor along the east side of the Archangel Road, in the Reed Creek side of the Hatcher Pass Special Use Area. In the final plan recommendation, a wide area between the Archangel Road and Reed Creek will be open to motorized recreation. The landscape is such that no developed corridor will be needed, as motorized users will be able to ride in the open area	Delete draft plan recommendation.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		east of the road. (See above discussion on Archangel Road).	
Recreation: Non-Motorized Winter Corridor	This corridor was recommended as part of the base plan recommendation to alleviate public safety concerns on the Archangel and Fern Mine Roads.	In the initial DNR base recommendation, a non-motorized corridor would have been developed along the west side of the Archangel Road, within the Reed Creek side of the Hatcher Pass Special Use Area. In the final plan recommendation however, the area west of Reed Creek along the Archangel Road will become open to motorized use and the Archangel Road itself will become a winter non-motorized trail. Based on the revised recommendation no non-motorized corridor is needed along the Archangel Road. (See above discussion on Archangel Road).	Delete draft plan recommendation.
Line by Line Analysis			
Page 3-66 Line 23 - 37	The Reed Lakes and Little Susitna River Valleys are closed to motorized use but motorized use is occurring there. Is this illegal use a justification for opening the Reed Lakes area?	The illegal motorized recreational use occurring in the Hatcher Pass Special Use Area is not being used as a justification for potentially opening the area under the “Winter Option”.	No change.
MILE 16			
Summer Motorized Corridor through Mile-16	A summer corridor in the Mile-16 Unit will cause environmental degradation and recreational user conflicts. The corridor is opposed by many users, including the Fishhook Community Council.	This corridor was identified as an option in the draft plan, and was described this way in order to gauge the level of public support or opposition to this concept. It was not carried as a recommendation per se. There was widespread opposition to its inclusion in the plan. A number of reasons were given for this use being inappropriate; these included public safety caused by the juxtaposition of incompatible uses; the area of the proposed southern trailhead would be on private land and the corridor would cross portions of private land; the generation of noise and other adverse impacts; the intrusion of a motorized use in a traditionally non-motorized area; and the opposition of the borough to any such facility. Based on these concerns and the relative absence of support for this facility, this option will be dropped from the final plan.	The summer motorized corridor option will be dropped from the plan.
GOVERNMENT PEAK			
North-South motorized corridor (winter season only on borough land)	Extensive public comment was This issue was not addressed in the PRD, however extensive public comment was received on this issue, both for and against. There was no recommendation for a north-south	The Mat-Su Borough Assembly passed a resolution in May 2010 (Resolution No. 10-036), which recommended to DNR that the entire Government Peak management unit be managed as “year-round non-motorized, without any motorized corridor through the unit”. Since nearly all of the land within the Government Peak Unit is either owned or leased by the Mat-Su Borough, DNR considers it	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	corridor in the Government Peak Unit in the PRD. (Note: When the PRD was drafted the resolution before the Mat-Su Assembly described this corridor as winter only. The evaluation of this issue assumed this.	appropriate to accept their recommendation. See Recreation, Chapter 2, for a discussion of this issue.	
North-South motorized corridor (all season)	This issue was not addressed in the PRD, however extensive public comment was received on this issue, both for and against. There was no recommendation for a north-south corridor in the Government Peak Unit in the PRD. (Note: When the PRD was drafted the resolution before the Mat-Su Assembly described this corridor as winter only. The evaluation of this issue assumed this.	DNR's evaluation of the north-south motorized corridor was based on the borough's resolution, which identified the corridor as winter use only. The all-season use of this corridor was not evaluated. See above response.	No change.
East/West Corridor (On borough and state lands in the Southern Area of Government Peak) (Note: this issue is discussed in the Recreation section of Chapter 2 and the response is duplicated here.	Considerable public testimony was received on the issue of the creation of an east-west motorized corridor route as well. This route would occur within the southern part of the borough land in the Government Peak unit. It would eventually connect to trails to the west and east.	An east-west corridor was a tentative recommendation by the Mat-Su borough in the draft plan. Since that time, the Mat-Su Borough Assembly passed a resolution (no. 10-036) which recommended to DNR that that the Government Peak management unit be managed for non-motorized recreation without any motorized corridors through it. Nonetheless, the final plan provides the borough with the option of developing an east-west trail, extending to the west, across their land, which would ultimately connect with a proposed Schrock Road trailhead (or alternate location) on state land, emanating north from there on state land. This provision will allow the borough to remain consistent with this management plan should they choose to develop a motorized corridor at a later date. Note: The state is retaining the recommendation for a "west-east" corridor across the southern Bald Mountain/Hillside Unit, which would terminate on the borough land boundary.	Delete draft recommendation.
East/West motorized corridor along Fishhook Creek	Is a corridor along the south side of Fishhook Creek a possible location for a motorized corridor?	This variant alternative would require major fund expenditures for both the parking lot and the earthwork required at the east end of Fishhook Creek for the establishment of a motorized trail constructed to sustained trail standards. The purpose of this	Revise text to indicate that the parking lots (existing and proposed) on the East Side be enlarged to support motorized use within both the West and East Sides

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
(Note: this issue is also discussed in the Recreation section of Chapter 2.		<p>alternative would be to get snowmachiners to the existing east-west corridor situated north of Hatcher Pass Road that connects the Gold Mint parking lot with the Fishhook parking lot and thence to the West Side on the current route adjoining Hatcher Pass Road on its north side.</p> <p>Given the strong interest for the creation of additional winter motorized access to the West Side, this approach has merit but it needs to be compared to the fairly straightforward approach of enlarging the current parking lots and creating a new one at Archangel. Essentially this approach would enable improved access to the West Side using existing (and upgraded facilities) on the East Side. This is a more cost effective solution to the problem since it avoids many of the costs that would be incurred with the construction of both a parking lot and motorized trail at Fishhook Creek. It builds on existing facilities rather than creating a new set of facilities that would be costly to develop and difficult to manage.</p> <p>A variant approach to this would be to utilize the above solution and, should this be insufficient in terms of meeting demand or safety considerations, construct a motorized corridor along the south side of Fishhook Creek. Space for this corridor would have to be reserved. Access connections from the Fishhook Creek route on state land to a North South Corridor on borough land would be part of this corridor system, if the borough determined that a North South (motorized) corridor on borough land is warranted. This stepwise development approach is recommended.</p>	in addition to general increases in demand. Include the concept of step-wise development with the creation of a motorized corridor along Fishhook Creek if warranted which would include integration with a North South Corridor on borough land, if the latter is determined appropriate by the borough. Access connections from the Fishhook route on state land to a North South Corridor (on borough land) would be part of this corridor system.
April Bowl	Several commenter's felt that the April Bowl should be closed to snowmachine use. They contend that the area is not used for winter motorized activities but is a popular back-country ski area. It has been perceived as closed by the general public and, generally, there has been limited snow-machine use.	<p>The April Bowl area is actually split between the Bald Mountain and Government Peak units, with the boundary formed at the Summit Lake SRS. The boundary was intentionally drawn in this fashion because of the management differences between the general state land in the Government Peak unit and the land within a special administrative unit of the Summit Lake SRS.</p> <p>The approach identified in the PRD did not receive any adverse comments, while a significant number of individuals wanted the Bowl area closed entirely. Since a popular pattern of motorized recreation now exists and there are no significant public safety issues, DNR is reluctant to close this area to motorized use. Enforcement of a non-motorized area in April Bowl by DPOR would</p>	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		also be difficult.	
Development Lease – Borough	How will the changes in the management unit boundary effect the Government Peak Development Lease and plans for Nordic Ski Area Development?	<p>There should be no affect from a change in the management unit boundary on the development lease. The purpose of the lease is to expedite the development of an alpine ski facility in a portion of the Government Peak unit that is described in the plan as the ‘Northern Area’. Although not specifically identified in the lease, the development of Nordic ski facilities in the ‘Southern Area’ would be consistent with the intent of the lease.</p> <p>Changes in the boundary of the Government Peak unit do not affect the development lease per se. The lease boundaries, and the authority given to the borough by the state, remain fixed in the development lease (which is based on the Plan Amendment in 1989) until modified. This plan does not affect these aspects of the lease.</p>	No change.
Development Lease – Hydro-electric plant	Is there a determined location for the hydro-electric plant? The location of the facility should be depicted on the map.	<p>Yes, there is a specific location identified for this facility.</p> <p>It is inappropriate to include the location of proposed and not currently authorized facilities in the land use maps in this type of plan.</p>	No change.
Enforcement	Who manages the recreational use in the Government Peak Management Unit? There are snowmachine trails throughout the unit. Isn’t the area non-motorized?	<p>The management of recreation uses coincides with land ownership boundaries. DPOR is responsible for such management on state land in this unit and the borough is responsible for that on borough land.</p> <p>There is a tri-party management agreement between the state (DMLW, DPOR) and the borough that assigns management responsibility for recreation uses to DPOR but this agreement has not been followed up with a formal transfer of authority and by adequate funding. DPOR feels that without sufficient funding and a more formal and specific agreement on enforcement, DPOR cannot effectively enforce recreational use on borough land.</p>	No change.
Government Peak Trails	Where are all the trails in the Government Peak unit? Lots of trails exist. They need to be mapped and GPS’d.	The maps in the PRD only depict data for the existing trails on state land. The borough trail data was not finalized when the draft plan and maps were released for public comment. Those trails will be depicted on Government Peak Management Unit map in the final plan.	Revise maps to reflect Mat-Su Borough Trail information in the Government Peak management unit.
	A determination needs to be made about which trails to improve, provide signage, and re-vegetate.	The determination of which trails to upgrade to sustainable trail standards (and all of the other aspects that are noted) is not the function of a management plan of this type. Evaluations at this level of detail are conducted through a trail plan.	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
Other issues	Other issues related to Government Peak are described in the Chapter 3, Line by Line Analysis. See this section. These issues were raised by borough, not by the public, and concerned specific aspects of land management.		
Line By Line Analysis			
Page 3-83 Line 24	There is insufficient specific information about how the Government Peak Management Unit will be managed between the Borough and State. What are the agency responsibilities?	<p>The plan clearly states how (pp. 3-87-3-91) state land will be managed: This is spelled out in the sections on Management Intent, Generally Allowed Uses, and Uses Requiring Authorization, including Table 3-1. In general, these sections state that the state may only issue authorizations compatible with the concepts of Nordic and Alpine ski facility development.</p> <p>The plan defers to the borough to make management decisions on borough owned land, as long as the management is consistent with the general goals, management intent, and management guidelines in the plan.</p> <p>Detailed management direction is not provided in the plan, and it is inappropriate for the plan to include this detail. Specific management roles and responsibilities are an operational issue that should be addressed in an Inter-Agency Management Agreement. The details of an Inter-Agency Management Agreement are beyond the scope of this management plan.</p> <p>The Borough has two existing agreements with the State regarding the management of the Government Peak unit, a Management Agreement and a Development Lease. This plan recommends the revision of the management agreement and lease in Chapter 4, on page 4-2 lines, lines 1-9 and 15-23, respectively.</p>	No Change.
Page 3-83 – 93	There is inadequate nexus of between the text and management guidelines and recommendations in this section. More information is needed to tie the information together.	The plan states that the state will support the borough in its development of Nordic and Alpine ski facilities (p. 3-85, Line 29-30). The remainder of the section then spells out the management approach and management controls that will be used to implement this concept. The nexus seems straightforward; however, it is appropriate to modify plan language in the sentence that is quoted above to clarify this.	Revise plan to state: “The state supports the efforts of the borough in its development of both the Nordic and Alpine ski facilities <u>and the recommendations that follow implement this concept.</u> ”
Page 3-83 Foot Note 13	At the end of the footnote (#13) at the bottom of this page the statement is made the change in	The western boundaries of this unit were changed to follow topographic and hydrologic features and to include portions of this area in the adjacent management unit, to maintain consistency in	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	boundaries was to accommodate current uses. Given that the Government Peak unit is designated for non-motorized use, does the illegal motorized use that has occurred justify its change?	land management and to facilitate management and enforcement.	
Page 3-84 Line 19-20	This line is out of place.	Correct. Plan will be modified.	Plan will be modified to insert this sentence into an adjacent management unit.
Page 3-84 Line 16	A legal access point needs to be determined for access to state land. Insert hunting regulations and post signage.	All borough and state land is open and available for public use, although some areas may have some restrictions. Legal access is provided by section line easements and by other easements that may be authorized by the borough or state. A land management plan is not the correct venue for the posting of state hunting regulations. Refer to the ADF&G Handbook for state hunting regulations.	No change.
Page 3-85 Line 14-16	The plan states that DPOR shall function as the lead for the enforcement of general recreation and related activities, but at a public meeting DPOR staff said that they would not be overseeing borough land.	The plan makes the statement that is noted; however, the Management Agreement between DNR and the borough words it somewhat differently. “It is the intent of this agreement” that DPOR will act as that entity. The plan will be corrected to follow the wording of the agreement.	Revise plan text to indicate that the management agreement states that it is the <i>intent</i> of this agreement.
Page 3-85 Line 16	The wording “but works in coordination with the borough” is out of place. It should have been inserted at the end of sentence on line 6.	The plan text is correct as stated.	No change.
Page 3-85 Line 31-32	The Assembly has adopted Hatcher Pass New Beginnings. This document should be incorporated into the plan.	The plan mentions this plan on p. 3-85, lines 31-32.	No change.
Page 3-85 Line 34-36	Expand the statement regarding litigation settlement agreement.	The statement in the plan captures the essence of this agreement. There is no need to further elaborate on this agreement. However, the text will be revised to directly reference the settlement agreement as follows: “Consistent with a litigation related settlement agreement, (Cascadia Wilderness Project v. State of Alaska, DNR, DMLW), the land owned by the borough must be managed consistent with the Hatcher Pass Management Plan.	See response.
Page 3-87 Line 11	Make sure this statement matches the approved uses of the plan	This statement properly matches the plan. See management	Insert table that identifies allowed-not allowed generally allowed uses. See

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	regarding motorized uses. The plan needs to be clear as to which uses are allowed and where they occur.	recommendation on lines 32-36, p. 3-92. However, we concur that a listing of allowed and not allowed generally allowed uses, especially they are related to motorized uses, is appropriate and will add this to the plan. This table will cover the entirety of the planning area.	Attachment C.
Page 3-88 Line 7-23	The section of generally allowed uses needs to be rewritten. Generally allowed uses do not apply to borough land.	The plan clearly states that the generally allowed uses only apply to state land. What the text actually says is “These same uses are also allowed on borough land.” This is a different statement than what is inferred by the borough and, based on previous discussions with borough staff, this is a correct statement. However, to further clarify that state generally allowed uses do not affect borough land, change wording of sentence to make this clear.	Revise text to: “Although not subject to state generally allowed uses, these same uses are typically allowed on borough land.”
Page 3-91	What is the “step-down plan” referred to in Table 3-1?	This section pertains to “Trail Development and Management”. The “step-down” plan refers to any additional trail management plans that the Borough Assembly accepts in addition to the State’s trail plan. This is a specific management plan that is also referred to as a “step wise plan”. To clarify this issue, revise the reference from “a step down plan” to a “step-down plan” and include a definition in the glossary.	Revise reference from “a step down plan to a “step-wise plan” and include a definition in the glossary.
Page 3-92 Line 32-36	The first management recommendation made by the State is unclear. (It is unclear what constitutes the ‘first management recommendation’ made by the state. We assume this refers to the recommendation described on lines 11-15.)	The meaning of this management guideline is straightforward; it requires DNR to be consistent with the requirements of Table 3-1. By binding itself in this way, the borough receives assurance that state actions will be compatible with the overall intent of how the Government Peak unit is to be managed, which is described in this table and in the sections beginning on p. 3-87 and continuing through p. 3-92.	No change.
Page 3-93 Line 14-22	Add ‘sustainable’ to trail description to be consistent with other text. Is it a route or a corridor? If a corridor is established on borough land, it will be responsibility of the borough to manage but the tri-party management agreement states that DPOR is the lead enforcement agency.	Agreed. Change word from ‘sustained’ to ‘sustainable’. The borough is responsible for determining whether it is route or corridor since borough land is involved, at least initially. It will be responsibility of the borough to manage this route if it is determined that a route is feasible and is funded by the borough for development. Under the current tri-party management agreement, it is ‘the intent’ that DPOR will be the lead management entity. This agreement must be reevaluated subsequent to plan adoption, and the issue of management and enforcement will be revisited.	Change text to ‘sustainable’. No change. No change.
Page 3-93 Line 14-23	Why is the State recommending an all season, east-west motorized corridor across Borough land in the	The State did not make this recommendation. This recommendation came from the Mat-Su Borough early in the planning process and was included in the plan following review by	Delete borough draft recommendation. Revise plan text to note that this corridor is a provisional

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	Government Peak Unit?	<p>the borough. Since that time, the borough has recommended that there be no motorized corridors in this management unit. Nonetheless the state will be carrying this recommendation as a provisional recommendation for the borough in the event that they would like to develop this type of corridor in the future.</p> <p>However, the state believes that the development of a motorized corridor between borough land and Schrock Road within the Bald Mountain / Hillside Unit is appropriate and the plan map will be changed to reflect that recommendation. See above discussion in the section pertaining to the Bald Mountain Hillside Unit.</p>	<p>recommendation made by DNR.</p> <p>The plan map will be updated to depict a proposed motorized corridor between Mat-Su Borough land and Schrock Road.</p>
Page 3-94	Map 3-11 does not depict the two areas noted in the text on p. 3-86 as 'Northern Development Area' and 'Southern Development Area'.	Correct. The map should be revised.	Revise Map 3-11 to note 'Northern Development Area' and 'Southern Development Area'.
ADMINISTRATIVE-LDA			
		CHAPTER 4: IMPLEMENTATION	
Page 4-14	Table 4-1: Suggest that projects be prioritized and identify associated funding. Is the route multiple use or winter only? Language needs to be consistent.	<p>An east-west corridor was a tentative recommendation by the Mat-Su borough in the draft plan. Since that time, the Mat-Su Borough Assembly passed a resolution (no. 10-036) which recommended to DNR that that the Government Peak management unit be managed for non-motorized recreation without any motorized corridors through it.</p> <p>Since the majority of the land within the Government Peak unit is either owned or leased by the borough, the state will accede to their request and remove this as a recommendation made by the borough. Rather, it will be a provisional recommendation by DNR to provide the borough with the option of developing such a route in the future should they choose to do so. The borough will determine through their own planning process whether such a route is feasible and if so, whether it will be for winter only or year-round multiple uses.</p>	<p>No change.</p> <p>Change this recommendation to note that it is as a provisional recommendation made by DNR.</p>
Regulations	How will the plan be implemented? The plan does not address implementation which should be done through regulation.	To a very large degree the plan is self implementing. The land use matrix (Table 2-1) identifies the uses within the Hatcher Pass area that could occur and subsequent DNR decision making in the issuance of authorizations are to follow the requirements of that table. Generally allowed uses within each of the management units are also identified, including those units where there is intended to be a limitation on these uses. The plan also provides the basis for the implementation of the regulations that will form the basis for	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>the management of non-motorized areas. In addition, both the mineral closing and land classification orders, which are included in the plan as appendices B and C, will be approved at the same time that the plan as a whole is adopted.</p> <p>It is intended that the plan will also be implemented through regulations. The need to revise the current regulations that affect generally allowed uses is discussed in various parts of the plan but most specifically in the section ‘Administrative-Regulatory’, p. 4-2. Draft regulations are included in Appendix D.</p>	
Regulations	Regulations should be developed concurrently with the management plan.	<p>Draft regulations are included as part of the Public Review Draft. See Appendix D. The plan notes that these are draft regulations and that they may change depending on which final winter motorized recreation use option is chosen.</p> <p>Because there was uncertainty over which areas were to be closed to motorized use in the draft plan, it was decided early on in the planning process that it would be advisable to wait with the regulations until the plan had been adopted and the specific areas to be closed to motorized use were known.</p>	No text change; initiate regulations following approval of plan.
Regulations	There is opposition to any limits upon uses imposed by regulations.	<p>Controls were developed in the first plan (1986) and in its amendment (1989). They were converted into regulations in 2002. They were designed to provide a separation between users, to promote safety and effective management. These reasons continue to be valid.</p> <p>The continued use of regulations to limit uses is appropriate and is recommended in this plan, although the spatial pattern of the closed motorized areas have been changed to accommodate changes in technology, to create separation between users, and to enhance enforcement.</p>	No change.
Trail Plan (Note: also covered under Recreation, Chapter 2)	The plan does not include or recommend a trail development plan. The area needs a trail plan before a trail system is developed.	It is appropriate to include a recommendation that a trail plan be developed; this would be added to the implementation section of the plan.	Add: Trail plan should be developed. Include in Chapter 4.
Mineral Closures – Independence and Archangel units. (Note: also covered in Subsurface section, Chapter 2)	There is opposition to the closing of these two areas, which total together 635 acres. According to AMA, additional closing orders are not justified given the high mineral potential of the area. It is inappropriate to close these areas to	The proposed mineral closures recommended in the draft plan affected two areas: the smallest, of 50 acres, is intended to close an area adjacent to the Independence Mine Historic Site itself and the other, of 585 acres, is intended to close an area in the Archangel unit to mining where extensive recreation use occurs and where recreation facility development is likely to occur. Mining in the area of the historic site is inappropriate and mining is incompatible with	Update plan maps and text to reflect change in mineral closure recommendation from 585 acres to 130 acres in the Archangel and Reed Lakes/Little Susitna units.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	mining since mining is a temporary use and the land can be reclaimed after the use terminates. Potential conflicts can be handled through the permitting process. If necessary, the two areas could be subject to a leasehold location order.	the current recreation uses that occur in the Archangel unit. DNR maintains that these closures are warranted and that the best way to protect both areas is through a mineral closure. A leasehold location order, if utilized, would allow for mining and it is this use itself that we believe to be inappropriate at these two locations. However, upon further review, DNR has reduced the recommendation for mineral closure in the Archangel Unit to 130 acres. A portion of this revised mineral entry closure is located in the Reed Lakes/Little Susitna unit. The total acreage recommended for mineral closures overall is 180 acres in the final plan.	
Mineral Closures – Hatcher Pass Public Use Area (Note: also covered in Subsurface section, Chapter 2)	AMA is opposed to the expansion of the Hatcher Pass Public Use Area to include the Reed Lakes-Reed Creeks area. Since the PUA closes land to mineral entry, this action would, in effect, be a mineral closure. It would require a mineral closing order. They question why the current management scheme cannot handle the type of development-use that is proposed for this area. It is not a justifiable action.	The inclusion of the Reed Lakes-Reed Creek area (as well as the 16 Mile unit) within the Hatcher Pass PUA is to provide the same type of protection that is afforded to the areas currently within the PUA. There has been strong public support for this approach throughout the planning process as well. The areas proposed for inclusion are now closed to mineral entry: MCO 496 closes the Reed Lakes area and MCO 499 closes the small part of the Mile 16 unit that is not included in the existing Public Use Area. There is no adverse affect upon the mineral industry from the proposed expansion of the PUA; the areas are closed under AS 38.05.185 authorities.	Change recommendation to indicate the effect of this action (which is negligible) on mineral development. This impact is not readily apparent in the recommendation and needs to be noted.
Facility Recommendations	The plan does not provide justification for the facilities that are recommended and does not establish funding priorities.	Justification for the types of projects that are recommended are described, generally, in the 'Facility Recommendations' in Chapter 4 and, specifically, in each of the management units. Funding priorities were not established because of the difficulty of matching facility priorities to funding sources and because other processes are used to establish funding priorities (for example, the state Transportation Improvement Program budgets road improvement monies).	No change.
Facilities: West Side	There are not enough facilities recommended on the West Side.	A number of facilities have been recommended on the west side. The locations of the trailheads, parking areas, and restroom facilities are along the road corridor and developed trails because it would not be possible to maintain facilities that have no developed access to them. Facilities were recommended for the Willow Mountain, Bald Mountain - Hillside, and Craigie Creek Management Units. The plan also recommended parking facilities outside of the planning area. Parking was recommended along the Willow-	A statement regarding the importance of the development of facilities on the West Side will be added to the description of facility recommendations in Chapter 4.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		<p>Fishhook Road west of the Willow Mountain Unit and at the terminus of Schrock Road at the southern base of the Bald Mountain-Hillside Unit.</p> <p>New facilities and facility upgrades on the east side were also recommended in accessible areas only.</p>	
Facility Maintenance: West Side	If DPOR does not manage the west side, who will be responsible for the maintenance of parking lots and restrooms on the west side?	The SCRO will be responsible for the maintenance of facilities on the west side, if developed, as they are the lead management agency for the area.	No change.
Funding (Note: also covered in Recreation section, Chapter 2)	There are no funding mechanisms in the plan for DNR development recommendations. Will any of the recommendations be funded? If so, how?	<p>DNR investigated the feasibility of developing some type of program that would generate revenue to cover infrastructure, maintenance, and enforcement expenses for the Hatcher Pass area. A number of different approaches were evaluated and all had problems of some type. The conclusion from this research was that additional monies could only be generated from parking fees associated with parking lots with sanitary facilities. This approach is now being used and a number of new parking facilities are being recommended for development where fees could be used, but the monies from a source of this type are not anywhere sufficient to cover expenses of the type that are incurred by DNR in its administration of the Hatcher Pass area.</p> <p>Our conclusion is that the current means of financing – direct appropriations and utilization of federal transportation monies for road and road associated projects – will continue to be the most viable methods for the financing of improvements. It can be expected that some, but certainly not all, of the facilities that are recommended in Chapter 4 will be funded.</p>	No change.
Funding: Parking Fees	Why are there charges for parking in the Hatcher Pass planning area?	There are not charges for parking in the planning area, per se. The fees are actually for the available sanitary facility usage associated with the parking lot. The fees collected are used to fund the maintenance of the facilities. Fees are only charged for those facilities maintained by DPOR.	No change.
Management Authority	Plan does not designate management authority or agency responsibilities in the planning area. It is unclear which agency will be providing on-site management in the planning area.	Agency responsibilities for plan implementation are described in the section, 'Agency Responsibilities for Implementation'.	No change.
DPOR Management authority	DPOR management authority should be expanded to include the entirety	This recommendation, which was raised by some of the public, is based on the premise that DPOR is the most effective management	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
	of the Hatcher Pass area.	<p>entity for the Hatcher Pass area. Although not stated, presumably this results from the presence of DPOR rangers in Hatcher Pass already and, at least by some, the feeling that Parks is better able to manage this area because of their citation authority and their recreation orientation.</p> <p>It is not appropriate for a management plan to make a determination of this type. The appropriate venue is through the management agreement between DMLW and DPOR that assigns management roles. This must be revised after plan adoption and this is the appropriate time and vehicle for the resolution of this issue.</p>	
Management Agreement: DPOR	Why does DPOR manage the east side of the Hatcher Pass Planning Area?	<p>DPOR presently provides enforcement related to recreation in the east side of the Hatcher Pass planning area as part of their responsibilities related to two existing inter-agency management agreements with DMLW and the Mat-Su Borough. The former authorizes DPOR to manage enforcement and facility maintenance on the east side of the planning area. The latter intends that DPOR serve as the lead enforcement agency on land owned or leased by the Mat-Su borough in the Government Peak Management Unit. Both management agreements are currently being revised.</p> <p>A general description of these management agreements can be found in chapter 4, beginning on page 4-2.</p>	No change.
State Park Designation	Consideration should be given to the designation of the Hatcher Pass area as a state park.	<p>Consideration was given to the designation of a portion of Hatcher Pass as a state park, but it was determined that there is no current public consensus on whether a state park or some other form of management control is appropriate, and therefore the establishment of a state park at Hatcher Pass seems inappropriate, or at least premature, at this time. One important aspect of any decision to create a state park concerns the management of mining activity. Much of the Hatcher Pass area has been important historically for mining and mining retains a significant presence in this area. Since the mineral estate is closed in state parks the question of how to manage this resource must be determine. It may be more practicable to use a different approach such as the designation of a portion of the Hatcher Pass area as a state recreation area or, more simply, the extension of the current boundaries of the Hatcher Pass Public Use Area. (The plan recommends the extension of PUA boundaries to include the Reed Lakes/Creek and Mile 16 areas, which encompass some of the more heavily used recreation areas.) These issues must be sorted out</p>	No change.

<u>Subject</u>	<u>Issue</u>	<u>Response</u>	<u>Recommendation</u>
		before a decision can be made on the desirability of creating a state park.	