September 2, 2021

Mr. Kevin Husa
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Subject: Copper River Basin Area Plan Revision Public Scoping Comments

Dear Mr. Husa,

Please accept these comments on behalf of the Alaska Invasive Species Partnership (AKISP) regarding the Copper River Basin Area Plan (CRBAP) Revision. The AKISP is an informal affiliation of interested individuals representing agencies, organizations, and members of the public. Our purpose is to work for the management of invasive species across the landscape and aquatic systems statewide. We work to heighten awareness of the impacts of invasive species to the environment and economies in Alaska.

Invasive species have characteristics that allow them to dominate native species communities, such as maximized competition, predation on native species, lack of native predators, and chemical or physical attributes contributing to explosive population growth. If action is taken, Alaska may avoid further negative impacts of invasive species to our state. The most cost-effective option for addressing invasive species is prevention through outreach and best practices to avert introduction and spread. Prevention practices are necessary to ensure the negative impacts of invasive species are avoided to the greatest extent because Alaskans rely on healthy environments for food, livelihoods, cultural practices, and personal and private economies. Notably, permit stipulations requiring industry compliance with best management practices is an economical and efficient means of protecting public lands.

Within the Copper River Basin, there are over 9,000 known occurrences of at least 72 invasive plant species, as recorded in the Alaska Exotic Plant Inventory Clearinghouse (AKEPIC), a user-friendly, searchable database of invasive plants reported on public lands in the state of Alaska (https://accs.uaa.alaska.edu/invasive-species/non-native-plants/). As land development and access increases in the Copper River Basin, so does the opportunity for spread of these known invasive plants as well as the possibility of new invasions. This process of invasion is exemplified by the introduction and rapid spread of white sweetclover (*Melilotus albus*) along the Richardson Highway and Tok Cut-off over the last 15 years. This pernicious invasive species was introduced in gravel and fill material used during recent road and bridge construction projects and has since spread out along the primary rights-of-way in the Copper River Basin. Large infestations of white sweetclover at the Gulkana and Gakona River Bridges as well as at the intersection of the Tok Cut-off and Nabesna Road now threaten to spread into the tributaries of the Copper River. If allowed to establish along the gravel bars of these river corridors, white sweetclover will outcompete native vegetation, alter pollinator activity, disrupt the process of vegetation succession that our wildlife depend upon, and create

monocultures that are incredibly difficult and expensive to eradicate. Furthermore, several of the invasive plant infestations along our state roadways and urban areas are harmful to hayfields and/or poisonous to livestock that the Kenny Lake agricultural community depend upon. Given these invaders are at the doorstep of the CRBA, it is highly likely they will continue to spread and impact vulnerable habitat on and around state owned lands if preventative and active management measures are not taken.

We recognize that the 1986 CRBAP is very out of date and there is a new format that the Alaska Department of Natural Resources (ADNR) is using for their revised plans. With that in mind, we ask that ADNR consider that the 1986 CRBAP does not address the introduction, spread and impacts of invasive species. For example, all components of the 1986 CRBAP as outlined in *Chapter Two: Areawide Land Management Policies* that involve new or existing access, disturbance, and development on state lands and waters have the potential to introduce harmful invasive species to terrestrial and aquatic environments. We request that ADNR consider incorporating more specific preventative best management practices along with standardized survey and response protocols in this planning process. While the 2021 North Slope Area Plan (see page 2-20) mentions invasive species in a broad sense, in our experience early detection and rapid response – the most cost-effective way to manage invasive species – requires more specific management practices.

We make the following specific recommendations for the updated CRBAP:

- Management guidelines and goals should emphasize preventative activities. Thoroughly cleaning all equipment prior to use within the Copper River Basin Area, and especially after use in a known infested area, can reduce the spread of existing invasive plant populations. This is especially important since the opportunity for the introduction and spread of invasive plant species is due to ground disturbance associated with all management practices defined in the CRBAP (i.e. agriculture, forestry, transportation, trail management, subsurface resources, public access and settlement).
- Adhere to the Best Management Practices for Road Maintenance, which can be found in this manual hyper-linked below. This manual was created in partnership between multiple state agencies and the University of Alaska Fairbanks Cooperative Extension Service: http://cespubs.uaf.edu/index.php/download_file/1441/. The manual is also attached to this letter for your convenience.
- Regarding material extraction and importation: All mineral materials, topsoil, and straw or hay should be certified as weed-free under the State of Alaska's Division of Agriculture weed-free certification program prior to use in road maintenance, construction, or erosion control projects.
- Include recognition and mitigation tactics of the potential for vehicles, boats, and planes to transfer non-native invertebrates, vertebrates and fungi, in addition to terrestrial and aquatic plants.
- For new development projects, include baseline surveys of all species present prior to commencement of work; regularly schedule early detection surveys for invasive species during specific projects and after completion; prepare response plans in the event invasive species are detected to ensure rapid response; and implement post-response monitoring and assessment.

Thank you for this opportunity to comment on the CRBAP Revision. We look forward to continued communication on this process and remain available for any follow up on behalf of invasive species considerations moving forward. Together, we can keep Alaska wild and free of invasive species.

Sincerely,

[redacted]

PMC-00342

BEST MANAGEMENT PRACTICES

CONTROLLING THE SPREAD OF INVASIVE PLANTS DURING ROAD MAINTENANCE

by Gino Graziano, Steven Seefeldt and Lydia Clayton

COOPERATIVE EXTENSION SERVICE
UNIVERSITY OF ALASKA FAIRBANKS

Intent of the Manual

The intended audience for this best management practices (BMP) booklet is people who perform routine maintenance activities such as vegetation clearing on roads, trails, railways and utility corridors. Many of the practices described in this booklet are applicable well beyond the intended audience.

These best management practices should be used when planning activities and when in the field conducting maintenance projects. Activities such as identification and reporting of high-priority invasive plants are best served if the booklet is in hand when a suspect plant is spotted. Provide these booklets to all employees working on maintenance and place them in all vehicles to ensure they are taken into the field.

Acknowledgements

This publication was produced in cooperation with the UAF Cooperative Extension Service, Alaska Department of Transportation and Public Facilities, and the U.S. Forest Service Alaska Region. Reviewed by the Alaska Division of Agriculture, Washington State University Extension, and the Alaska Department of Transportation and Public Facilities.

Data for map images sourced from the Alaska Exotic Plant Information Clearinghouse (AKEPIC) database (http://aknhp.uaa.alaska.edu/maps/akepic/). Alaska Natural Heritage Program, University of Alaska Anchorage. Accessed January 29, 2014.

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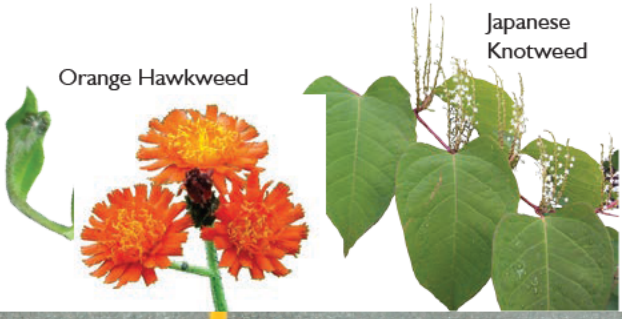


The Problem with Invasive Plants

Invasive plants may be accidentally or deliberately introduced to an area where they grow uncontrolled, negatively affecting natural systems, agriculture, the economy or human health. Invasive plants often establish on roadsides and other disturbed sites where there is frequent human traffic. Some invasive plants are problematic for roadside maintenance as they become entangled in and may be spread by mowing equipment. Some grow tall enough to block sighting distances and some may attract wildlife. Finally, many are able to move from the road corridor and invade natural or agricultural areas.

The State of Alaska, Department of Natural Resources, Division of Agriculture regulates noxious weeds (11 AAC 34.020), which are not allowed (or have specific tolerances) as contaminants of seed or other materials for planting. While control of these weeds is not currently a legal requirement, management is a priority for many agencies and the public.

DID YOU KNOW?

Implementing best management practices for roadside maintenance activities and making minor adjustments to mowing schedules can control the establishment and spread of invasive weeds. These practices will also reduce future costly maintenance activities. For more information on best management practices, see page 6.

The growing agricultural industry in Alaska has many advantages because few invasive plants currently infest the state. To a large extent, this allows farmers to reduce tillage and use fewer herbicides than producers in the Lower 48.

Invasive plants negatively impact natural systems. High-density white sweetclover infestations in Alaska prevent certain willow seedlings from establishing on glacial streams, and sweetclover is suspected of altering pollination of berry-producing plants. Bird cherry growing at water edges provides less food for terrestrial insects eaten by fish than native trees and is toxic to moose.

Regular disturbance from mowing and traffic and a constant influx of seeds that arrive on contaminated equipment, gravel/fill, revegetation seed and vehicles combine to make roadsides a great environment for weeds to grow in. Infestations spread readily on road corridors and can become the source of new infestations on farms and natural areas.

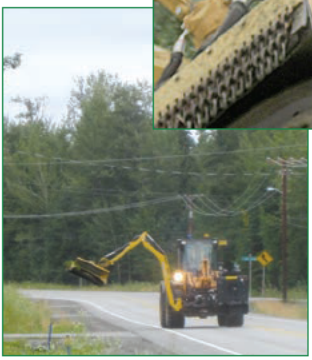
Once established on a roadside, invasive plants are difficult to remove. Invasive plants can grow rapidly and foul machinery and block sighting distance, creating general maintenance and safety issues. Some invasive plants, such as Japanese knotweed, can even grow through asphalt, causing damage to the road surface.

Invasive plants can spread from roadsides to agricultural lands and natural areas where they displace crops and desirable vegetation. It is well known that weeds reduce crop yields and cost farmers money to control. Invasive plants in natural areas can reduce the quality of habitat for salmon and moose as well as other plant and animal species.

This booklet describes best management practices (BMP) that help prevent the spread of invasive plants on roadsides and into agricultural or natural areas. Activities such as mowing, grading, ditching and construction can work to either exacerbate or prevent the spread of invasive plants. The best management practices in this booklet are designed to help road maintenance personnel prevent the spread of invasive plants and provide managers with a variety of control strategies.

Best Management Practices

1. **Clean vehicles and equipment regularly.** When returning to the maintenance station, clean vehicles and equipment using a pressure washer. Wheel wells, areas behind the bumper and other spaces that regularly accumulate dirt, vegetation or seeds deserve extra attention. When possible, clean vehicles and equipment before leaving the infested area.



White sweetclover, shown here, entangles mowing equipment. You can see how spreading seeds and plant parts with equipment is easy to do.

2. **Revegetate** with native, local and/or noninvasive plant species. Vigorous noninvasive perennial grass species may prevent the establishment of invasive plant species. Contact a Department of Transportation and Public Facilities environmental analyst or the Division of Agriculture Plant Materials Center for assistance with seed mixtures for your location.

This recently cleaned mower not only looks good but also has a reduced risk of transporting seeds and other plant propagules to a new site. Photo courtesy of Brett Nelson, Alaska Department of Transportation

3. **Avoid infested areas.** Do not travel through infested areas. Do not park or stage equipment in infested areas. If an infested area is used, control weeds to prevent additional seed development and always wash vehicles when leaving the area.

Vigorous low-growing grasses are easy to maintain, and can be effective competitors with weeds. Photo courtesy of Brett Nelson, Alaska Department of Transportation

4. **Work from uninfested to infested areas.** Perform maintenance activities starting in noninfested areas and move toward infested areas. Managing uninvaded areas first ensures that invasive weeds do not contaminate equipment and move to new areas. In most cases, areas away from towns are less likely to be infested.

Mow sites infested with weeds last to prevent the spread of seeds to noninfested areas.

5. **Coordinate with local groups** that are managing invasive species. Opportunities to complement efforts exist where weed managers are targeting a species or infestations in an area.

The Division of Agriculture and other groups often manage weeds on roadsides and appreciate coordination with roadside maintenance activities. Photo courtesy of Alaska Division of Agriculture

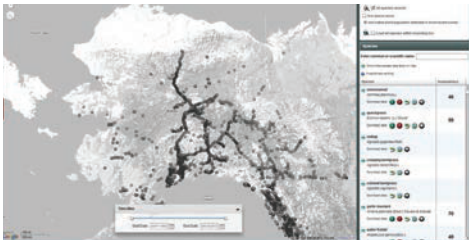
6. **Time your mowing** to prevent seed production by invasive plants. With some invasive plant species, it may be necessary to mow more than once in the summer.

These creeping thistle plants have ripe seed that if mowed will be transported to new areas.

7. **Use certified weed-free materials,** including gravel, topsoil, hay/straw and erosion control tubes, whenever possible. This is especially important when working near sensitive habitats, such as streams, rivers and wetlands, or areas that are known to be weed-free. Contact your local Soil and Water Conservation District and/or the Division of Agriculture, Plant Materials Center for local supplies of certified weed-free material.

Gravel sometimes harbors weed seeds. Shown here is sweetclover growing on a gravel pile. Photo courtesy of the Alaska Division of Agriculture

8. **Identify locations of known invasive plant infestations** and plan maintenance activities accordingly. Mowing, ditching and other disturbance activities should occur before plants set seed. Contact the Cooperative Extension Service for timing information if you are unsure.



The AKEPIC data portal is a great resource for determining where weeds are in your work area. Visit http://aknhp.uaa.alaska.edu/botany/akepic/.

9. **Record and report locations of invasive plants** through the Alaska Exotic Plant Information Clearinghouse (AKEPIC, see page 10), or use the citizen monitoring portal submission form if you are unsure of the identification or are unable to use the AKEPIC site (www.uaf.edu/ces/ipm, see page 12).

10. **Scout for invasive plants prior to performing maintenance activities.** Weed infestations can quietly move into new areas, and the only way to know which species are there is to scout the areas before you work in them.

Planning to Avoid Infestations

Many invasive plant infestations on roadsides are already recorded in an online searchable database known as the **Alaska Exotic Plant Information Clearinghouse**, which is hosted by the University of Alaska Anchorage Alaska Natural Heritage Program. This database does not replace the need to scout work areas regularly. Use this database to help plan in advance what control options are available to avoid spreading invasive plants.

Once you have accessed the AKEPIC website (http://aknhp.uaa.alaska.edu/botany/akepic/) click on the AKEPIC data portal link on either the right or left side. Accept the terms of use to access the data. When the data portal is accessed, you see hexagons that represent multiple locations where invasive plants are documented; as you zoom in on the map these hexagons will represent one location. There are two basic ways to query the AKEPIC database: by area or by species.

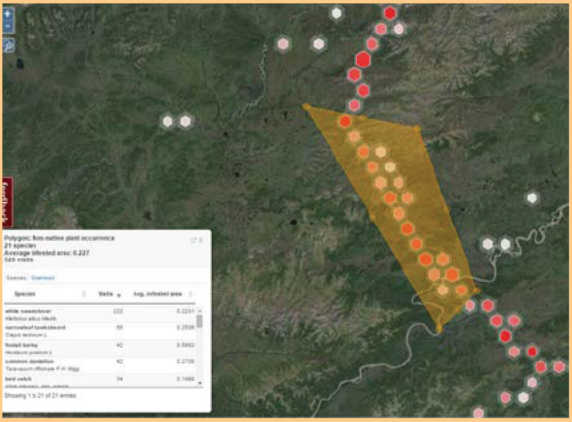
To explore the types of non-native species found in a given area, navigate to your area of interest and select the polygon tool in the upper section of the right-hand

Can't remember the website address? Just search for AKEPIC (Alaska Exotic Plant Information Clearinghouse) and select the AKEPIC data portal.

navigation pane. Using your mouse, draw a polygon around the area of interest; double click to complete the polygon. A data window summarizing the records within your area of interest will appear in the lower left-hand corner of the screen.

To explore the distribution of a given species across the state, type the scientific or common name into the search box in the lower section of the navigation pane. Species can be filtered by invasiveness category or sorted by invasiveness rank within the species list. The known locations of that species will appear as red circles. Summary information can be displayed by hovering over a given location; more detailed information is displayed by clicking on the location. Once finished, you can download the results of your query in a format you prefer by selecting the "Download" tab in the data summary window (for area-specific queries) or the download button to the right of the species name (for species-specific queries); Microsoft Excel is most widely applicable. The ability to print your map is also available. To clear an area-specific search, click on the trash can icon next to the polygon tool; to clear a species-specific search, delete text in the search box.

Download the results of your query by selecting the "Download" tab in the data summary window.



Reporting Invasive Plants and Identification Help

Contacting the correct people when a new invasive plant shows up in an area can save a lot of money and resources down the road. Whether you think you spotted a new invasive plant or just need to confirm the identity of one, you can use the following online reporting system to submit photos and/or location descriptions and ask questions.

If you see an unusual plant or need help determining how to control the spread of invasive weeds, you can get information in the following ways:

Submit data online at www.alaskainvasives.org.

Call 1-877-520-5211 for local assistance from the Cooperative Extension Service.

Make sure to provide the following information:

- Pictures of the plant or a contained sample of the specimen
- Location description, milepost, GPS latitude and longitude, etc.
- Size of the infestation
- Your contact information

Plant submission

Name: First and Last*

E-mail*

Phone

District

Anchorage

Other location

Location/Physical Address

Latitude

Longitude

When did you first notice the pest?

Area affected

- ○ Garden
- ○ Landscape
- ○ Forest/natural area
- ○ Turf/Lawn
- ○ Agricultural field
- ○ Structure of building

Is the plant impacting vegetation

No

What do you think the plant might be?

Additional comments. What is your main concern?

Upload picture

Choose File no file selected

Integrated Vegetation Management Overview

Integrated vegetation management uses five general classifications of weed control methods: prevention, physical, biological, cultural and chemical. In many cases, it is beneficial to use a combination of methods to ensure adequate control.

Prevention is the first step in any integrated vegetation management program. Cleaning equipment regularly to ensure that weed seeds are not transported is an ideal measure. Other measures include using certified weed-free gravel, topsoil and erosion control tubes.

Physical (mechanical) methods such as mowing, grading and hand pulling are often used in conjunction with other control methods. Mowing considerations of timing and frequency are covered in the best management practices for each target weed in this publication.

Biological weed control — the use of insects, grazers and pathogens to control a weed population — is not included in this booklet. Currently there are no weed species in Alaska that have an approved biocontrol agent. While grazing animals can be valuable for biocontrol, use of these on rights-of-way can be problematic.

Cultural methods include keeping areas mowed before weed seeds develop and promoting desirable vegetation. Growth stages appropriate for mowing are included under each target weed management profile. Promoting desirable vegetation can help prevent weed establishment by eliminating bare ground where weeds are likely to invade. For information on practices to promote desirable vegetation, refer to *A Revegetation Manual for Alaska* (http://dnr.alaska.gov/ag/RevegManual.pdf).

Chemical methods of control are covered in the profile of each of the target species, including rates and species-specific chemical control information. In Alaska, all right-of-way applications must be made by a certified pesticide applicator. This publication is not exhaustive

in providing herbicide options, and control success may be obtained with additional registered products. The recommendations provided are identified as the most efficacious for non-grazed rights-of-way and may not be compatible with other sites. Below are some considerations for herbicide application that apply to all plants.

Timing of chemical methods is critical to success and should correspond to the most sensitive growth stage of target species for each herbicide (see "Did You Know?" for information about timing control methods). Additionally, herbicides are most effective when applied to unstressed and actively growing plants.

The herbicide recommendations in this publication are for active ingredients; any brand names are provided as examples. Brand name products may come premixed with adjuvants, which are additives used to improve herbicidal activity and application characteristics. In most control efforts, adding a compatible surfactant will increase product effectiveness; consult product label for recommended adjuvants.

Product labels often list a range of application rates. This booklet provides recommendations based on the highest label rate for ground broadcast treatments. If lower use rates are preferred, start with the highest rate and reduce rates only if the desired control is achieved. Labels may include aerial treatment, spot treatment, stem injection or other application methods. If using a method of application other than ground broadcast treatment, consult the label for the appropriate concentration and rate. Aerial applications are not covered under integrated vegetation management (IVM) plans approved by the Department of Environmental Conservation (DEC). Aerial applications require a pesticide use permit from the DEC.

After treatment with any chemical, the plants must absorb and translocate (move through vascular tissue) the chemical to all of its parts before it will die. Translocation may take several weeks. Do not mow, pull

or treat plants with other chemicals until the original chemical application has had time to take effect. Lengths of time for chemicals to take effect are included on product labels.

After treatment, it is imperative to monitor the application site for control success. Plants that are not affected by an application may be resistant to the chemical mode of action chosen and will need to be controlled by an alternative method. If resistant plants are allowed to reproduce (by seed or otherwise), their offspring may also be resistant. Integrating multiple control methods, choosing a different chemical mode of action, tank mixing different mode-of-action chemicals for retreatment or removing plants by physical methods are good ways to avoid selecting for resistant plants.

When weed seeds are suspected of contaminating soil beyond the area where they are growing, treating the area beyond the boundary of the identified infestation with a chemical that has a soil residual period (e.g., aminopyralid) that kills any later-germinating seeds can be effective. The optimal area to treat will vary based on the target species and infestation size. Consult your local Cooperative Extension Service office for a recommended spray boundary.

Soil-persistent chemicals can be used for multiple years of control at a site; however, additional care should be taken when using these chemicals. Treated soil or vegetation from the site should not be moved since it may still contain the active ingredient, which can affect nontarget species. Additionally, plans for future revegetation should be considered to avoid the effects of soil-persistent chemicals on sensitive species.

The herbicide application rates and site information contained in this publication are accurate at the time of writing; however, labels change, ALWAYS REFER TO THE LABEL for the most current information.

DID YOU KNOW?

Timing is critical. Plants develop through several growth stages: seed, seedling, vegetative, flowering and mature. If herbicides are not used during the optimum stage, the results are usually unsatisfactory. As a general rule, weeds are more susceptible at the seedling stage, when rapid growth takes place. Spraying large weeds may burn off leaves, but the plant may regrow. Mowing weeds at maturity may expand the problem by further spreading seeds. Regular scouting of weed-infested areas will help you decide which best management practice to use for controlling weeds.

Seedling (Photo courtesy of Bruce Ackley, The Ohio State University, Bugwood org, perennial sowthistle, *Sonchus arvensis)*

Vegetative (Photo courtesy of Caleb Slemmons, University of Wisconsin, Stevens Point, Bugwood org, perennial sowthistle, *Sonchus arvensis)*

Flowering (Photo courtesy of OSU Extension Slide Set Archives, The Ohio State University, Bugwood. org, perennial sowthistle, *Sonchus arvensis)*

Mature (Photo courtesy of David Cappaert, Michigan State University, Bugwood org perennial sowthistle, *Sonchus arvensis)*

Herbicides for woody vegetation and selected invasive weeds on Alaska rights-of-way

	Triclopyr with 2, 4-D	Clopyralid	Triclopyr	2,4-D	2,4-D with Dicamba
Bird vetch	E	E	E	G	G
Creeping thistle	G	E	G	G	G
Knotweeds	F	F	F-G	F	F
Giant hogweed	G	P		P	P
Orange hawkweed	G	E	G	G	G
Perennial sowthistle	G	F	G	G	G
Reed canarygrass	P	P	P	P	P
Spotted knapweed	G	E	F	G	G
White sweetclover	G	G	G	G	G
Woody vegetation	G	P-E	G	F	F

E = Excellent (90+ percent control)
G = Good (75-90 percent control)
F = Fair (some suppression)
P = Poor (no control)

Orange hawkweek is shown here.

Herbicides for woody vegetation and selected invasive weeds on Alaska rights-of-way

	Aminopyralid	Glyphosate	Imazapyr	Imazapic	Chlorsulfuron
Bird vetch	E	G			G
Creeping thistle	E	G	G	P	F
Knotweeds	G	G-E	E	F	F
Giant hogweed	G	G	G-E	G	E
Orange hawkweed	E	G	P	P	P
Perennial sowthistle	G	G	G	P	P
Reed canarygrass	P	G-E	E	E	G
Spotted knapweed	E	G	P	P	P
White sweetclover	E	G		G	E
Woody vegetation	F	G	G	F	F

DID YOU KNOW?

Active ingredient (ai) and acid equivalent (ae) are not interchangeable. The acid equivalent represents the base molecule primarily responsible for the phytotoxic effect. The active ingredient includes additives to the base molecule that increase performance (e.g., absorption) but are removed by enzymes in the plant before phytotoxic effects occur. If you are working with a recommendation to apply a specific amount of ai for a specific product and you choose to use a different product, applying the same amount of ai might not result in the right amount of ae. If you use a different formulation than recommended or provided as examples in this booklet, make sure that you apply a similar amount of ae to get the job done. Labels include the ae for that product.

Bird vetch, *Vicia cracca*

Photo courtesy of Katie Spellman, University of Alaska Fairbanks

Bird vetch is a prevalent perennial in communities around Fairbanks, Palmer and Anchorage; less so in areas such as Salcha-Delta and the Kenai Peninsula. It spreads by seed and underground rhizomes, smothering woody vegetation and fences.

Be Aware: Some native plants look like bird vetch. Marsh pea and beach pea both look similar; however, they typically do not grow as aggressively and they have winged stems.

Mowing: Mow before flowering. Mowing mature plants will spread seeds and contaminate equipment. Mowing does not kill bird vetch, but it will delay flowering and

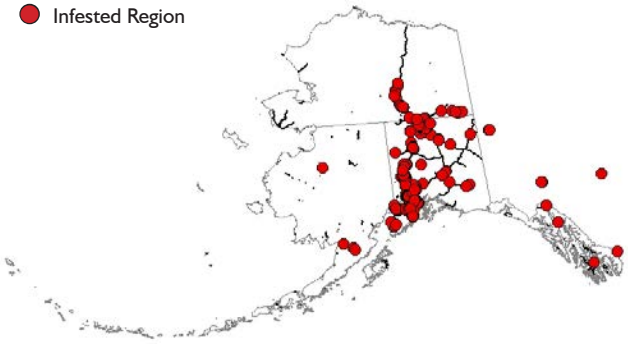
Active ingredient	Active ingredient or acid equivalent rate	Product	Product rate
Clopyralid	0.5 pound acid equivalent/acre	Transline	1.3 pints/ acre
Triclopyr	0.75 pound acid equivalent/acre	Garlon 3A	2 pints/ acre
2,4-D	1.85 pounds acid equivalent/acre	Whiteout	4 pints/ acre

Photo courtesy of Michael Rasy, University of Alaska Fairbanks, Bugwood.org

seed set. Mowing multiple times throughout the season will favor grasses and reduce bird vetch.

Grading: Grading will spread root fragments, replanting them where the grader pushes the roots.

Herbicides: Chemical control of bird vetch is most effective early in the growing season when leaves of the plant are obvious and before plants form flowers. Apply the maximum label rate of an herbicide containing clopyralid, triclopyr or 2,4-D as the primary active ingredient. Only 2,4-D may be used in areas managed as lawns or with ornamental plantings. Do not pull or mow the bird vetch for at least two weeks after herbicide application. Herbicides are most effective when allowed to translocate to the plants roots. Management with the mentioned herbicides will damage other broadleaf plants but will not damage grasses.



Creeping thistle, *Cirsium arvense*

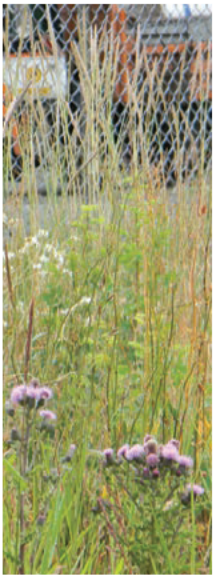


Photo courtesy of Alaska Division of Agriculture

UAF Cooperative Extension Archive, University of Alaska Fairbanks, Bugwood.org

Creeping thistle is a perennial with extensive underground rhizomes; also known as Canada thistle. It is widespread in Anchorage and Haines but rare elsewhere in Alaska. If found, report infestations (see page 10) so information can be forwarded to the Alaska Division of Agriculture, which is leading an effort to manage thistle in Anchorage and eradicate it elsewhere.

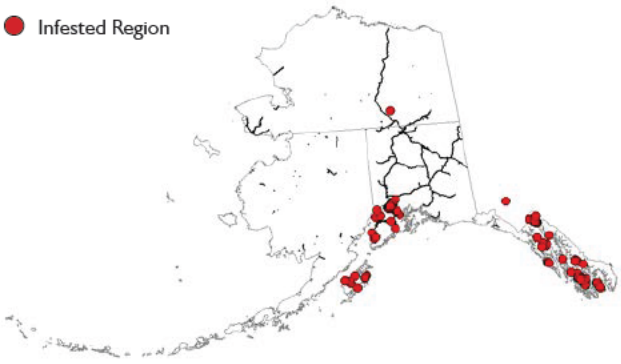
Active ingredient	Active ingredient or acid equivalent rate	Product	Product rate
2,4-D with Dicamba	2 pounds active ingredient/acre	Escalade	2–5 pints/ acre
Aminopyralid	0.1 pound active ingredient/acre	Milestone	7 ounces/ acre
Clopyralid	0.5 pound acid equivalent/acre	Transline	1.3 pints/ acre
Glyphosate	3.1 pounds active ingredient/acre	Aqua-master	2.3 quarts/ acre

Manual: Not effective.

Mowing: Mow when the plants begin to bolt (shoots elongate and begin to form a flower) but before flowering; this will keep seeds from spreading and reduce seed production.

Grading: Creeping thistle spreads readily from root fragments; grading will spread thistle.

Herbicides: Chemical control of creeping thistle is effective at multiple times of the year, depending on the active ingredient used. Products containing 2,4-D with dicamba, aminopyralid or clopyralid as the primary active ingredients are effective in the early summer or fall. Applications of these products in the fall are enhanced by mowing midsummer to force plants into the rosette stage. Midsummer mowing also may reduce seed production. Products containing glyphosate are most effective when used at the prebud or bud stage (shoots elongating and beginning to form flowers) or in the fall after midsummer mowing.



Giant hogweed, *Heracleum mantegazzianum*

Photo courtesy of Alaska Division of Agriculture

Giant hogweed has only been found once, in Kake, Alaska. If giant hogweed is found, report the location immediately (see page 10). Giant hogweed looks similar to the native *Heracleum* sp., commonly called cow parsnip or pushke, and is distinguished by size and leaf form. Giant hogweed can reach 10–15 feet in height, with flowers that are up to 2½ feet across and deeply divided leaves 3 to 5 feet wide. In contrast, cow parsnip or pushke is 4 to 6 feet tall with flowers up to 1 foot across and lobed leaves up to 2 feet wide.

Active ingredient	Active ingredient or acid equivalent rate	Product	Product rate
Glyphosate	1.50 pounds acid equivalent/acre	Aqua-master	48 ounces/ acre
Imazapic	0.19 pound active ingredient/acre	Plateau	12 ounces/ acre

Photos courtesy of Alaska Division of Agriculture

Caution: Giant hogweed has toxic sap that can cause photosensitivity and chemical burns on skin. Do not allow any part of the plant or sap from cut plants to come into contact with skin. Always wear appropriate personal protective equipment: long sleeves, long pants, closed-toe shoes, gloves and safety glasses.

Manual: Digging plants up is effective if done before flowers produce seed and if all of the roots are removed. Dispose of flowers in plastic bags to prevent the spread of seeds. Note the cautionary statement regarding skin contact above.

Mowing: When mowed, giant hogweed will resprout from the main root stalk. Long-term repetitive mowing is necessary to prevent flowering and starve the root stock of nutrients. Note the cautionary statement regarding skin contact above.

Herbicides: Control with herbicides is effective for management. Herbicide control in Alaska is not documented. However, the *Pacific Northwest Weed Management Handbook* (http://pnwhandbooks.org/weed/) recommends products containing the active ingredients glyphosate or imazapic.

Knotweeds — Japanese, Giant, Himalayan and Bohemian, *Fallopia and Persicaria spp.*

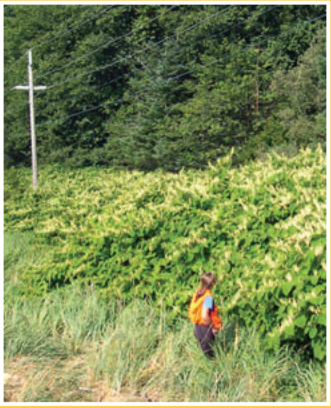


Photo courtesy of Tom Heutte, USDA Forest Service, Bugwood.org

Photo courtesy of Alaska Division of Agriculture

Introduced as garden ornamentals, Japanese, giant, Himalayan and Bohemian knotweeds are often found on roadsides and disturbed areas in Southeast Alaska. Knotweeds also grow on stream banks, lake shores and beach fringes. Plants will grow to 10 feet tall and smother vegetation around them. Knotweed spreads by stems and roots. Southcentral Alaska has some ornamental plantings. If found outside of cultivation, report these knotweeds (see page 10).

Active ingredient	Active ingredient or acid equivalent rate	Product	Product rate
Triclopyr	0.05 – 0.19 pound acide equivalent/ gallon	Garlon 3A*	2–8 ounces/ gallon
Glyphosate	0.19 – 0.59 pound acid equivalent/ gallon	Aqua-master*	6–19 ounces/ gallon
Imazapyr	0.5 – 1 pound active ingredient/acre	Habitat	3–4 pints/ acre

*Garlon 3A is for spot treatment. Label states not to exceed 9 pounds acid equivalent/acre/year. **Aquamaster is for broadcast treatments not to exceed 3 pounds acid equivalent/acre/year. Spot treatments are for 2 percent Aquamaster or 5 ounces Aquamaster per gallon.

Infested areas should be avoided and any dirt or fill material from infested areas should be disposed of in a contained area where it will not be allowed to grow. For disposal recommendations, contact your local Cooperative Extension Service office (http://uaf.edu/ces/info/directory/districts/).

Photo courtesy of Michael Shephard, USDA Forest Service, Bugwood.org

Manual: Not effective

Mowing: Do not mow knotweeds or allow brush-cutting activities in infested areas. Mowing or cutting knotweeds will encourage stem growth and may spread plant fragments to new areas.

Grading: Knotweeds spread by root and stem fragments. Grading will spread knotweeds to new areas.

Herbicide: Currently, the control of knotweeds is best achieved through chemical methods. Effective active ingredients for knotweed control are triclopyr, glyphosate and imazapyr. These active ingredients are sold under many trade names, some labeled for use around water. Knotweeds are best treated when actively growing from the bud stage or beyond. Imazapyr can be used just before a killing frost. Stem injection of knotweeds with Aquamaster is possible, but sometimes adjacent vegetation can be injured from root uptake of injected glyphosate.

Orange hawkweed, *Hieracium aurantiacum*

Orange hawkweed spreads aggressively with rhizomes and stolons. Shown here, orange hawkweed is the dominant species in a meadow near Karluk Lake on Kodiak Island. Photo courtesy of Leslie Kerr, USFWS

Orange hawkweed is a perennial with unmistakable bold orange flowers that make identification easy. No other wild aster plants in Alaska have red-orange flowers. Typically, where there is one plant and flower there are many. Avoid areas with orange hawkweed present and not actively controlled.

Active ingredient	Active ingredient or acid equivalent rate	Product	Product rate
Aminopyralid	0.1 pound active ingredient/acre	Milestone	7 ounces/ acre
Clopyralid	0.5 pound acid equivaelent/acre	Transline	1.3 pints/ acre
2,4-D with Dicamba	2 pounds acid equivalent/acre 2,4-D and 0.25 pounds acide equivalent/acre Dicamba	Escalade	2–5 pints/ acre

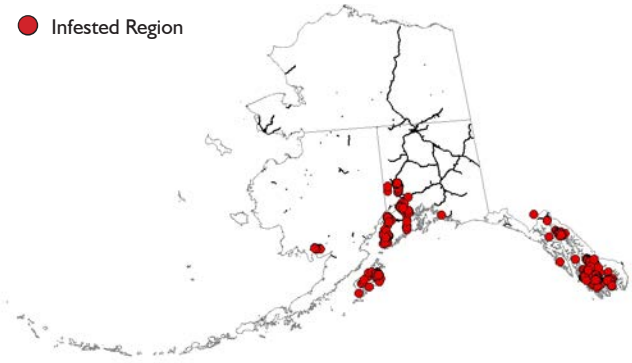
Orange hawkweed is a small, perennial, dandelionlike herb topped with bright orange flowers. Photo courtesy of UAF Cooperative Extension Archive, Bugwood.org

Manual: Not effective.

Mowing: Orange hawkweed is not controlled by mowing. If mowing or brush cutting is needed for an area where hawkweed is present and not actively controlled, mow early in the season before plants flower. To prevent spreading seeds and contaminating equipment, do not mow mature plants.

Grading: Orange hawkweed spreads by below-ground rhizomes and above-ground stolons. Grading will move viable plant parts and spread the infestation.

Herbicides: Application of herbicides to actively growing orange hawkweed plants from the early season rosette stage through bud stage is more effective than late-season applications to the rosettes. Herbicides effective on orange hawkweed include products containing aminopyralid, clopyralid and 2,4-D with dicamba. Use the maximum label rate.



Perennial sowthistle *Sonchus arvensis*

OSU Extension Slide Set Archives, The Ohio State University, Bugwood.org

Perennial sowthistle resembles a tall, gangly dandelion and is most easily identified in August when in flower. Sowthistle is prevalent in Juneau, Anchorage and

Active ingredient	Active ingredient or acid equivalent rate	Product	Product rate
Aminopyralid	0.1 pound active ingredient/acre	Milestone	7 ounces/ acre
Clopyralid	0.5 pound acid equivalent/acre	Transline	1.3 pints/ acre
2,4-D with Dicamba	2 pounds acid equivalent/acre 2,4-D and 0.25 pounds acid equivalent/acre Dicamba	Escalade	2–5 pints/ acre
Glyphosate	3 pounds active ingredient/acre	Roundup	3 quarts/ acre

Fairbanks and is found in smaller patches in other areas around Alaska.

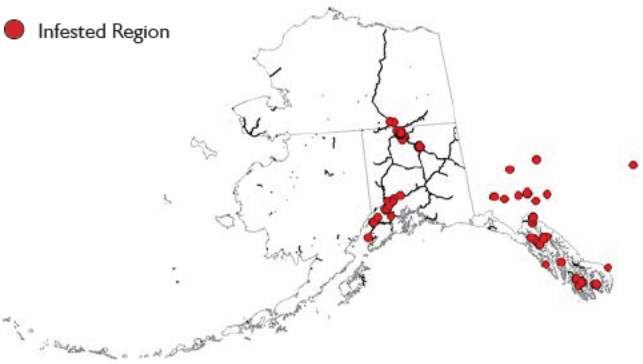
Caleb Slemmons, University of Wisconsin, Stevens Point, Bugwood.org

Manual: Hand pulling or digging sowthistle is not effective except for small infestations, and all roots must be removed. Plants will regenerate from root fragments.

Mowing: Complete mowing activities before flowering to prevent equipment from spreading seed. Mowing multiple times in the summer season will control, but not eradicate, perennial sowthistle.

Grading: Grading will spread root fragments to new areas.

Herbicides: Control of perennial sowthistle is effective at multiple times of the year, depending on the active ingredient used. Products containing aminopyralid, and clopyralid as the primary active ingredients are effective in the early summer or fall. Products containing glyphosate or 2,4-D with dicamba are most effective when used while the plant is bolting (shoots elongating and beginning to form flowers) or in the fall. Applications of any of these products in the fall are enhanced by mowing midsummer, which may also prevent seed production.



Reed canarygrass, *Phalaris arundinacea*

Photo courtesy of Alaska Association of Conservation Districts

Reed canarygrass was introduced as a forage crop and for erosion control to much of Southeast Alaska and the road system-connected portions of the northern and central regions of Alaska. Reed canarygrass spreads by roots and seeds, becoming a problem when it invades stream banks and wetlands. Control work should focus on keeping reed canarygrass out of areas near streams and wetlands.

Manual: Hand pulling or digging reed canarygrass is not effective unless done for a small infestation and all roots are removed.

Active ingredient	Active ingredient or acid equivalent rate	Product	Product rate
Imazapyr	1 pound acid equivalent/acre	Habitat	4 pints/ acre
Glyphosate	3.1 pounds active ingredient/acre	Aqua-master	2.3 quarts/ acre

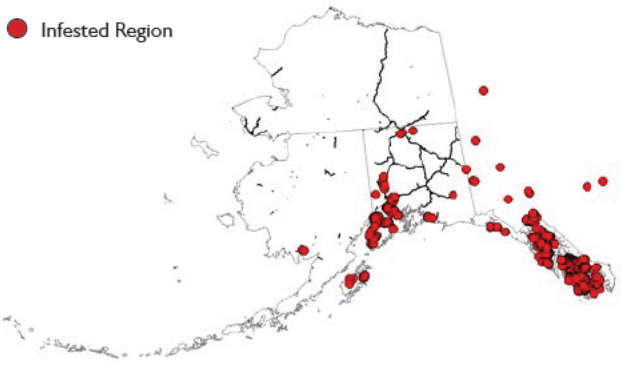
Weed barriers: Use of tarps and weed barriers for control has mixed results. Control is increased by laying barriers 2 feet beyond the infestation and controlling the edges manually or with chemicals.

Photo courtesy of Alaska Association of Conservation Districts

Mowing: Reed canarygrass seed production may be reduced or eliminated if the plant is mowed at least twice during the growing season. Mowing will not eradicate an infestation. To prevent spreading seeds and contaminating equipment, do not mow mature plants.

Grading: Grading will spread root fragments to new areas.

Herbicides: Chemical control of reed canarygrass is effective in spring and fall on actively growing plants. Late-season applications are enhanced by mowing mid-summer, which starves roots of carbohydrates. Use the maximum label rate for products containing imazapyr or glyphosate. Take care to avoid spraying desirable vegetation, as products listed are not selective. The examples provided are formulations approved for use when contact with water is expected.



Spotted knapweed, *Centaurea stoebe*

Rare in Alaska, spotted knapweed should be reported (see page 10) whenever found to help with eradication efforts. Knapweed is usually found near pullouts and areas where equipment or vehicles were staged or parked. If found, avoid the area completely.

Active ingredient	Active ingredient or acid equivalent rate	Product	Product rate
2,4-D	2 pounds acid equivalent/acre	Whiteout	4.3 pints/ acre
Clopyralid	0.5 pound acid equivalent/acre	Transline	1.3 pints/ acre
Aminopyralid	0.1 pound acid equivalent/acre	Milestone	7 ounces/ acre
Glyphosate	4.05 pounds active ingredient/acre	Aqua-master	3 quarts/ acre

Manual: Small infestations of spotted knapweed are effectively controlled with hand pulling prior to seed set. Knapweed should be pulled twice each growing season until eradicated.

Photo courtesy of Michael Rasy, University of Alaska Fairbanks, Bugwood.org

Mowing: Spotted knapweed can be mowed from the bud stage to early flowering stage. To prevent spreading seeds and contaminating equipment, do not mow mature plants. Mowing will not eradicate the infestation unless seed production is prevented every year until all plants are gone.

Photo courtesy of Michael Shephard, USDA Forest Service, Bugwood.org

Grading: Seeds remain viable in the soil for several years and grading will move them to new areas.

Herbicides: Herbicide products with active ingredients such as 2,4-D, clopyralid, glyphosate and aminopyralid will control knapweed. Most chemical controls are best applied to rosettes in the fall or early spring using maximum label rates.

White sweetclover, *Melilotus albus*

Photo courtesy of University of Alaska Anchorage Archive, Bugwood.org

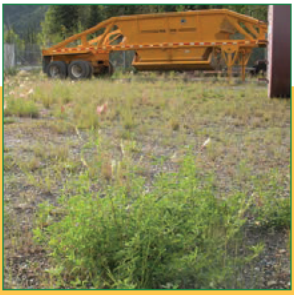
Photo courtesy of Richard Old, XID Services, Inc., Bugwood.org

Sweetclover will line roadsides when left unmanaged.

Prevalent on road systems and in some gravel pits, sweetclover invades glacial floodplains, burned areas and trails. When present in high densities, it inhibits establishment of willow.

Active ingredient	Active ingredient or acid equivalent rate	Product	Product rate
Chlorsulfuron	5.9–11.7 grams active ingredient/acre	Telar XP	0.5–1 ounces/ acre
Triclopyr	6–9 pounds acid equivalent/acre	Garlon 3A	0.25–3 gallons/ acre
2,4-D	1.85–3.7 pounds acid equivalent/acre	Whiteout	4–8 pints/ acre
Aminopyralid	0.06–0.1 pound acid equivalent/acre	Milestone	4–7 ounces/ acre

Manual: Hand pulling is possible, but it is labor intensive. Pulling after mowing, or pulling plants that are not controlled by herbicide treatments, will aid in eradication efforts.

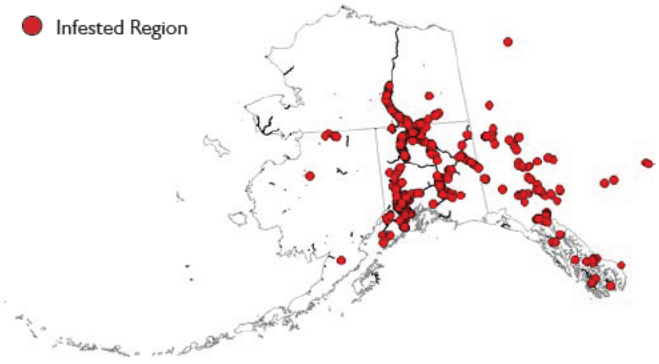


Remove sweetclover from equipment yards.
Photo courtesy of Alaska Division of Agriculture

Mowing: Mow 1 inch from ground before maturity or the beginning of flowering. Repeated mowing will reduce, but not eliminate, seed production. When mowing is combined with revegetation efforts, eradication may be achieved.

Grading: Early spring grading of infested roadsides can kill first-year sweetclover plants, but grading will spread seed. If possible, start at the end of the infested section of roadside and work toward the center of the infested section.

Herbicides: Chlorsulfuron provides the most thorough control. To avoid selection for resistant populations, rotate repeated applications with different modes of action or consider tank mixing two products. Make applications in spring or summer to seedlings or plants in early bud to flower stage. Use chlorsulfuron, triclopyr, 2,4-D or aminopyralid.



Woody Vegetation

Photo courtesy of Brett Nelson, Alaska Department of Transportation and Public Facilities

Active ingredient	Active ingredient or acid equivalent/acre	Product brand	Product rate
Glyphosate	5.4 pounds active ingredient/gallon	Accord XRT II	2 gallons/ acre
	4 pounds active ingredient/gallon	Roundup Pro	2.0 percent solution
	5.5 pounds active ingredient/gallon	Roundup Pro Max	1.5percent solution
2, 4-D	3.7 pounds active ingredient/gallon	Weedone LV6	0.67 gallon/ acre
	0.5–1.5 pounds acid equivalent/acre	Arsenal Powerline	2–6 pints/ acre
Triclopyr	2–8 pounds acid equivalent/acre	Garlon 4	1–2 gallons/ acre
	3–9 pounds acid equivalent/ acre	Garlon 3A	1–3 gallons/ acre
Triclopyr + 2, 4-D	1.5 pounds acid equivalent triclopyr/ acre and 3.0 pounds acid equivalent 2,4-D/acre	Crossbow	1.5 gallons/ acre or 1.5 percent solution

Safety along a roadside is the main issue when determining which woody vegetation should be removed. Woody vegetation reduces sight distance along roadways and attracts animals such as moose. All woody vegetation that endangers the public should be removed as soon as possible. A thorough understanding of the species to be controlled and consideration of proper timing is important with any control method to reduce damage, minimize visual impact and be cost effective.

Mechanical: In many cases, mowing most of the existing vegetation is effective; it may be necessary to chop or hand cut large trees and mow smaller brush. This removal should be performed in coordination with other target species control methods. Attention should be paid to growth the development stage of target species and removal should be performed well before plants mature and set seed to eliminate seed spread. Removal of woody vegetation prior to chemical control methods may be necessary to ensure good coverage of target species.

Herbicides: Where mechanical removal is not practical, herbicides may be applied. Generally, the best control of woody vegetation occurs when most of the sap is not flowing up the tree or after the plant is fully leafed. Broadcast applications are effective for controlling brush and trees along roadsides. Active ingredients commonly used on foliage as broadcast applications to control woody vegetation are included in the table opposite. See product label for additional application methods and rates.

To simplify information, trade names of products have been used. No endorsement of named products by the University of Alaska Fairbanks Cooperative Extension Service is intended, nor is criticism implied of similar products that are not mentioned.

Gino Graziano, Invasive Plants Instructor, Steven Seefeldt, former Extension Faculty, Agriculture and Horticulture, and Lydia Clayton, former Extension Faculty, Agriculture and Horticulture.

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12-14/GG-SS-LC/05-20 **Reviewed October 2019**

September 8, 2021

Dear Planning Team,

The following are the scoping comments of the Alaska Quiet Rights Coalition (AQRC) on the revision of the Copper River Basin Area Plan for State Lands. Thank you for the chance to participate--again--in this very important planning process. Since we're at the same stage in the planning process--scoping--that we were in April, 2016, before the process was put on hold, we're to a large extent resending (although with some edits and a few additions) what we provided at that time. The issues that we addressed then--the need to protect natural sounds and natural quiet, and to redress the gross imbalance on the public lands between those managed for quiet, human-powered, truly traditional forms of recreation like hiking, canoeing, kayaking, snowshoeing, and cross-country skiing, and those where motorized recreation is allowed and dominates--are even more urgent than they were in 2016 as largely unregulated motorized use increases while the small number of trails and areas managed for quiet, human-powered recreation does not (the effectively unusable Rusty Lake Trail is the only designated non-motorized trail on the 3.3 million acres of state land within the Planning Area).

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

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

1. **The Natural Soundscape** (natural sounds and natural quiet). Many of us remember very well when it was quite unusual to be disturbed by mechanical noises in the outdoors. There was quiet, which was beautiful in itself, and there were beautiful natural sounds, like falling snow and birdsong. These days, that quiet and that chance to hear natural sounds are all too frequently shattered. As we said above, there are many places in Alaska that look the same as they did 100 or more years ago, but very few that sound as they did just 10 or 20 years ago. But "peace and quiet" are still highly valued, and frequently mentioned by visitors to the public lands both in Alaska and Outside as one of the outstanding and most appreciated characteristics of those lands. The State of Alaska should seek to protect those values, and where necessary, restore them. And as we also said above, the natural soundscape is just as deserving of analysis and protection as other ecological values that are routinely assessed.

Unnatural noise can harm human health, both mental and physical. A doctor at a Seattle hearing on a proposal that would result in large numbers of coal trains passing thorough the city said that the two biggest stressors he sees in his patients are traffic and noise. Natural quiet and natural sounds can be

soothing and can benefit human health. And unnatural noise can harm wildlife as well as humans; one of the best examples is how this can disturb songbirds during the breeding season.

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

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

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

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

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

As suggested above, the effect of motorized vehicle noise on humans is not their only impact. Ecological impacts include degradation of fish and wildlife habitat; other impacts to fish and

wildlife; air and water pollution; often severe damage to soils and vegetation; snow compaction; and the loss of natural quiet and natural sounds. As a responsible steward, the State should of course protect these important resources.

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

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

The regional conservation group Copper Country Alliance compiled in 2016 a list of areas and trails that it suggests are suitable for quality quiet recreation and should be recommended for closure to motorized recreation (or at least some reasonable portion of them). We include that list below, which we have no reason to believe is no longer valid, and endorse it.

- A portion of Thompson Pass. Experienced and knowledgeable backcountry skiers have recommend that the northern, partially wooded end of the Thompson Pass area, Mile 34 to 54, be non-motorized. This does not include the highly popular open areas farther south, and receives relatively little, and relatively recent, snowmachine use. This proposal is supported by many local residents, as well of course as others who would like to be able to enjoy a high quality, quiet, human-powered experience on at least some portion of Thompson Pass, one of the region's most spectacular areas.
- Tiekel River downstream of the Richardson Highway.
- Mile 62 Richardson Highway to Kimball Pass via telegraph route.
- Perhaps another route or area within the Tonsina Controlled Use Area, which is already closed for motorized hunting from late July through September.
- A route on any state land along the north bluff of the Tonsina River, from the Richardson Highway bridge to the Edgerton Highway bridge.
- Mile 12.5 Denali Highway trail on the north side of the highway.
- Mile 4 Denali Highway to a ridge within the Paxson Closed Area.
- West side of the Copper River from O'Brien Creek south.
- Designated non-motorized routes or trails in the Nelchina Public Use Area.

3. **E-bikes; drones**. For many years AQRC's focus has been, and our concerns have been--and continue to be--on the relatively older types of recreational motorized vehicles like snowmachines, ATVs, jet skis, airboats, and small planes and helicopters used for flightseeing. These can create very significant problems. But in just the last five years, that is, since our 2016 comments, two new types of motorized recreational vehicles have emerged as significant problems and need to be regulated when used on the public lands--e-bikes, and drones when used for recreational, unpermitted purposes.

E-bikes are, by definition, motorized vehicles. In spite of this obvious fact, there is pressure to allow them on trails designated as non-motorized. DNR needs to resist this pressure and allow them to operate only where other types of motorized vehicles are allowed.

Drones present a number of problems. These include invading the privacy of other public land users, degrading the natural soundscape, disturbing and harassing wildlife, and degrading the quality of the backcountry experience. Regulations for their use are badly needed.

To provide more information about both e-bikes and drones, we will forward for inclusion in the administrative record a letter we sent to the Division of Parks on July 29, 2021.

4. **2016 Scoping Comments**. The scoping comments submitted by many other individuals and organizations in 2016 expressed concerns about the need for better regulation of motorized recreational vehicles and for more high-quality opportunities for quiet, human-powered recreationists. We wonder whether those people might have been discouraged by the five-year delay in getting the planning process moving again, and whether they will think it's worthwhile to submit the same or similar comments once again, only, perhaps, to see the process again come to a halt. How does DNR intend to treat those earlier scoping comments? We hope it will retain them in the administrative record and take them into serious consideration as the present process moves forward.

Finally, AQRC has been very concerned about the present administration's attitude regarding the management of recreational motorized vehicles. It has repealed the ban on jet ski use in the Kachemak Bay Critical Habitat Area in spite of the recommendation of its own biologists. It has proposed allowing motorized vehicles--e-bikes--on trails designated for non-motorized use only. It has proposed allowing snowmachines and ATVs on roads where they are, for very good reason, presently not allowed. The administration appears to be willing to do pretty much whatever the motorized community wants it to do. We hope the planning team will resist the pressure to cater to motorized recreationists and will draft a sensible, responsible plan which objectively evaluates the substantial impacts and conflicts that can be created by motorized recreational vehicle use.

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

Sincerely,

[redacted]
[redacted]
Alaska Quiet Rights Coalition
P.O. Box 202592
Anchorage, AK 99520

6 September 2021

Kevin Husa
CRBAP Project Manager
Alaska Department of Natural Resources
550 West 7th Ave, Suite 1050
Anchorage, Alaska 99501-3579
crbaprevision@alaska.gov

Re: Boreal Partners in Flight comments for public scoping process, Copper River Basin Area Plan revision

Dear Mr. Husa,

Thank you for the opportunity to comment on the proposed revision of the Copper River Basin Area Plan (CRBAP). The following letter represents the viewpoints and concerns of *Boreal Partners in Flight* (BPIF), a group that represents an Alaska-based coalition of scientists, conservationists, and birders who work together to help conserve landbird populations throughout boreal regions of North America. BPIF is a regional working group of the international *Partners in Flight (PIF)* program, which now also includes scientific professionals and the public from both Alaska and northwestern boreal Canada. The group was founded because of concerns about statewide and continental declines in populations of many landbird species, and today promotes conservation, raises awareness, and fosters research on landbirds and other species that use terrestrial habitats, such as shorebirds, owls, and grouse. BPIF also includes the Alaska Raptor Group.

BPIF's primary goal is to inform managers of the Copper River Basin (CRB) Area Plan of steeply declining Alaskan bird species that use the region as breeding habitat. Many of these species are considered by the State of Alaska to be "Species of Greatest Conservation Need" (SGCN), under the Alaska Department of Fish and Game State Wildlife Action Plan (https://www.adfg.alaska.gov/index.cfm?adfg=wildlifediversity.swap), and therefore particularly worthy of management actions to breeding habitats that reduce further decline. Rosenberg et al. (2019) further highlights the dramatic losses of birds in North America, especially those in that breed boreal forest habitats like the CRB. It is also our intention to inform managers of a subset of species that appear to be doing unusually well in the CRB area, compared to other parts of Alaska. In such situations, the CRB may

provide valuable habitat management opportunities for increasing populations of these species, given especially productive habitat within the CRB area.

The data on which we base our comments are presented in Table 1 below, which quantifies long-term trends (declines or increases) in both the CRB area and in Alaska overall, using the best available data from the annual North American Breeding Bird Survey (BBS) between 2004-2019. The BBS survey method represents a "gold standard" for assessing conservation status of >500 bird species across the U.S. (Hudson et al. 2017; https://pubs.er.usgs.gov/publication/70190187). BBS data and subsequent analysis are hosted by the U.S. Geological Survey, Patuxent Wildlife Research Center and available for public use. Trends presented in Table 1 were calculated by Adam Smith of Environment and Climate Change Canada and Melanie Smith of Audubon Alaska. Both are available upon request via GitHub and Google Drive. The accompanying Figure 1 illustrates the seven BBS survey routes within the CRB, each of which is approximately 25 miles in length, and comprised of 50 individual points where bird data are collected each summer via 3-minute point counts at each individual point.

Table 1 represents a list of 25 priority species for conservation that breed in the CRB region that are listed in the 2021 Alaska Landbird Plan (Handel et al. 2021). Nearly all are also included in the State of Alaska Wildlife Action Plan as Species of Greatest Conservation Need (ADFG 2015), and many are part of the Audubon Watchlist (https://ak.audubon.org/conservation/alaska-watchlist). **We recommend the CRBP revision address breeding habitat management and conservation for all species listed in Table 1**. Each is considered a conservation priority across multiple planning documents, because of continent-wide patterns of steep decline and/or the large proportion of populations that rely upon limited habitat in Alaska for breeding (Handel et al. 2021). Examples of declining species in Table 1 include American Tree Sparrows and multiple insectivorous bird species (swallows, flycatchers, warblers). Sparrows, as a group, are known to have undergone dramatic losses recently in North America (Rosenberg et al. 2019), and many taxa of insectivores are declining globally (e.g. Nebel et al. 2010). These example species underscore the need to conserve breeding habitat of declining species in the CRB region.

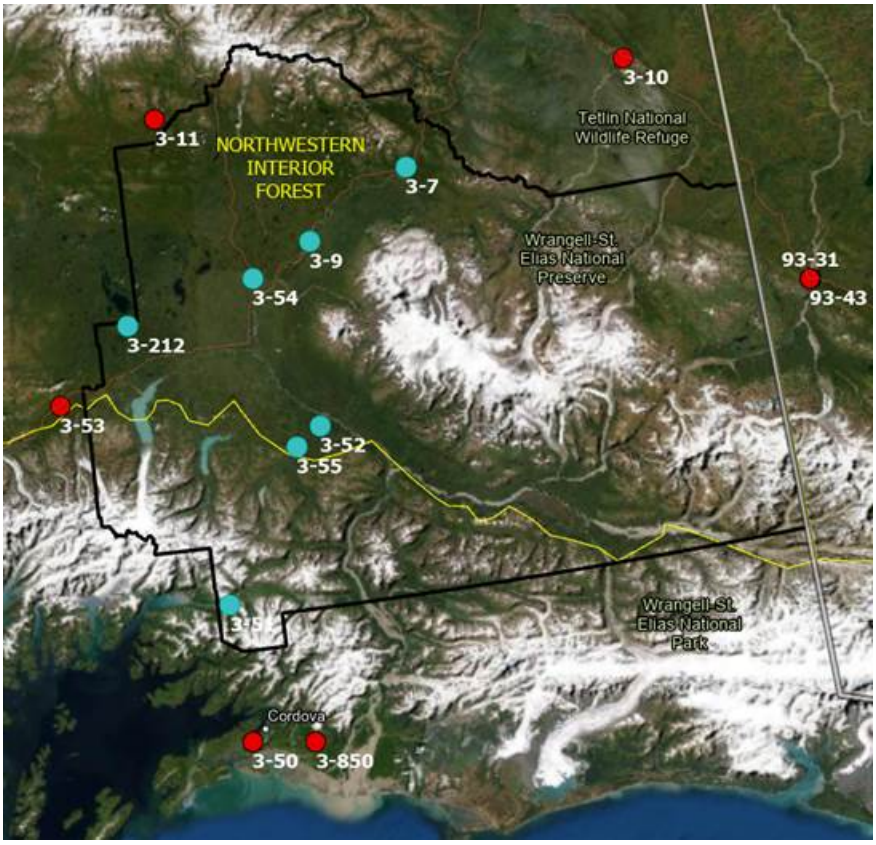
BBS trend data in Table also enable comparisons regionally between the CRB region and the rest of the state. We have highlighted some trends in **bold** that represent extreme cases. Species trends in Table 1 marked with "*" are **declining** within the CRB at a rate that is near double (or more) the rest of the state. Conversely, those marked with "**" are **increasing** at a rate that is near double (or more) the rest of the state. Both situations provide important management opportunities. Specifically, the CRBAP revision should now make efforts to minimize disturbance to breeding habitats of species to curb what appear to be unusually steep bird declines, or, conversely maintain adequate habitat for a species of concern that is thriving well in the CRB area. Rusty Blackbirds, for example, are a wetland species that have experienced an extremely steep decline in North America (88% population loss in 40 years; Greenberg and Matsuoka 2010), but show an increasing trend within the CRB that appears to be somewhat larger in magnitude than elsewhere in Alaska (Table 1). Even more notable patterns are evident for other priority species, including the Pacific Wren and Chestnut-backed Chickadee. The CRB area may provide critically valuable habitat for these increasing populations, which in turn can serve as sources of individuals for other parts of the state where the species is not doing as well.

Table 1. BBS trend data (2004-2019) for 25 priority bird species listed in the 2021 Alaska Landbird Plan, 24 of which are considered Species of Greatest Conservation Need (SGCN) within the State of Alaska Wildlife Action Plan, and several of which are cited by the Audubon Watchlist. All species listed below reflect significant conservation concerns due to state-wide and/or continent-wide declines, making management of breeding habitat imperative in the CRB region. Two columns of trend information also enable more detailed comparisons between the CRB area and the state of Alaska overall. CRB trends marked in **bold** with "*****" reflect a particularly steep decline (at or near double the rate within the CRB, compared to the statewide AK trend). Conversely, those marked with "******" reflect a notable increase (at or near double the rate within the CRB, compared to statewide trends). Each situation respectively provides an opportunity to manage habitat at two extremes—either for a species in unusually steep decline in the CRB, or for a species that may represent a thriving source population.

CR Species	CRB Trend (% per year)	State of AK Trend	Alaska Landbird Plan	State Wildlife Action Plan (SGCN)	Audubon Watchlist
American Tree Sparrow	**-14.6***	-6.5	Y	Y	
Bank Swallow	-10.2	-9.8	Y	Y	Y
Common Redpoll	**-8.2***	-2.4	Y	Y	
Bohemian Waxwing	-5.9	-3.9	Y	Y	
Olive-sided Flycatcher	-4.7	-4.0	Y	Y	Y
Orange-crowned Warbler	**-4.3***	-0.8	Y	Y	Y
Fox Sparrow	**-3.8***	-0.4	Y	Y	
Pine Siskin	-3.2	-2.0	Y	Y	
Western Wood-Pewee	-2.5	-2.9	Y	Y	Y
Northern Goshawk	-2.0	-2.7	Y	Y	
White-crowned Sparrow	**-1.9***	-0.4	Y	Y	
Blackpoll Warbler	**-1.8***	-0.1	Y	Y	Y
Ruby-crowned Kinglet	-1.5	-2.7	Y	Y	
Short-eared Owl	-1.4	-2.0	Y	Y	
Dark-eyed Junco (all forms)	-1.2	-0.8	Y	Y	
Varied Thrush	-1.0	-1.1	Y	Y	
Bald Eagle	-0.6	0.1	Y	Y	
Wilson's Warbler	-0.4	-1.1	Y	Y	
Song Sparrow	-0.3	0.3	Y	Y	
Gray-cheeked Thrush	-0.2	1.8	Y		
Lincoln's Sparrow	0.0	1.5	Y	Y	
Townsend's Warbler	1.0	-1.2	Y	Y	
Rusty Blackbird	**2.4****	1.5	Y	Y	
Chestnut-backed Chickadee	**4.1****	0.6	Y	Y	
Pacific Wren	**10.9****	3.6	Y	Y	

***Unusual **decline** in CRB compared to the rest of the State of Alaska. Management of CRB breeding habitat provides an additional opportunity to conserve a population that is notable for its unusually steep decline.
****Unusual **increase** in CRB compared to the rest of the State of Alaska. Management of CRB breeding habitat provides an additional opportunity to conserve potential source populations and increase population sizes for these species, which are in decline elsewhere.

Figure 1. Breeding Bird Survey routes (n=7) used to calculate species trends for the Copper River Basin (CRB) area (in blue, within black outline). Circles in red, falling outside the CRB area, were not included in CRB trend estimates but were included in the statewide Alaska estimates. Numbers by each circle represent the name of each particular route. Bird habitats north of the yellow line are considered to occur in boreal or "Northwestern Interior Forest" habitat, which has exhibited some of the most significant bird losses in recent years compared to other avian habitat types in North America (Rosenberg et al. 2019).



Specific Recommendations:

(1) We specifically urge DNR to consider the breeding habitat needs of the 25 priority species listed in Table 1, when promoting activities that would significantly impact the CRB landscape. This includes activities such as wetland filling, extractive development, or recreational trail networks, which would further exacerbate habitat loss for the 25 species listed. Such activities may destroy key areas used by wetland-obligate species, fragment valuable breeding habitat via development of motorized trail networks, increase ambient noise levels, and result in alteration of microhabitats like wetlands or riparian areas.

(2) We also see unique management opportunities for the CRBAP to address those species with trends in bold in Table 1. In these situations, small amounts of management effort to conserve and manage bird breeding habitat could greatly reduce steep regional losses, or potentially conserve a national or regional species of concern that appears to be increasing rapidly in the CRB area, compared to the rest of the state.

(3) Finally, BPIF is also concerned about potential impacts of activity in the CRB area on one other species that is ***not*** part of Table 1, because it is too rare to be adequately assessed with BBS trend data. Timberline Sparrow (*Spizella breweri taverneri*), is a species with a very small and restricted breeding range in Alaska that is entirely within the Upper Copper River Basin area. This species has a convoluted taxonomic history, and was once considered a distinct species but it is now nested as a subspecies of Brewer's Sparrow (*Spizella breweri*). Although not much is known about this species, what little previous work has been done indicates it has strict habitat requirements of steep south facing slopes in the transition zone between subalpine and alpine with large continuous patches of willow and dwarf birch (Doyle 1997). Currently, Timberline Sparrows have only been documented in two localities in Alaska: the vicinity of Gold Hill (1460-1525m) and the Upper Cheslina River (1325m; Z. Pohlen, US Fish and Wildlife Service, *pers. comm.*). The four points below are within 1km of where every individual has been documented in the state of Alaska. It is likely some other localities host this species closer to the Yukon border, but they are very remote and have never been surveyed.

Timberline Sparrow Sightings:

Gold Hill: 62.094590, -141.821267
SE facing slope E of Bonanza Creek: 62.092008, -141.861012
Paulson Creek drainage: 62.125937, -141.877344
Upper Cheslina drainage: 62.658484, -142.694221

Two important action items relate to Timberline Sparrows in the CRBAP revision. First, surveys in the vicinity of previous observations, as well as in suitable habitat east of these locations, should be part of the planning process. Second, activities planned for subalpine and alpine habitat that matches descriptions in Doyle (1997) should be subject to additional surveys for Timberline Sparrows and adaptive management of human activity. Combined, the two actions will ensure that the breeding habitat of this sensitive species remains intact.

Thank you again for the opportunity to contribute to the CRBAP scoping process. We look forward to seeing our comments incorporated into the new draft area plan. Please feel free to contact us with any questions, clarifications, or requests for additional information.

Sincerely,

[redacted]

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COPPER COUNTRY ALLIANCE
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a 501(c)(3) non-profit corporation
"Protecting the rural and wild natural environment of the Copper River/Wrangell Mountains region."

September 8, 2021

Kevin Husa, CRBAP Project Manager
Alaska Department of Natural Resources
550 West 7th Avenue, Suite 1050
Anchorage, AK 99501-3579

by email to crbaprevision@alaska.gov

Re: Copper River Basin Area Plan Revision

Dear Planners:

Copper Country Alliance is a volunteer grassroots 501(c)(3) organization that addresses conservation issues in the Copper Basin. The majority of our members are Copper Basin residents. They hunt, fish, hike, ski, snowshoe, pick wild berries, grow gardens, harvest firewood, enjoy and photograph the region's wildlife and stunning views, and participate in community projects and activities. Some of us use ATVs and boats to access nearby State lands in legally and responsible ways. We all want these activities to continue to be available, not just for ourselves, but for generations to come. Public lands and waters are essential for these activities.

CLIMATE CHANGE:
Climate change makes the task of formulating an Area Plan daunting indeed. The current plan—now 35 years old—does not mention climate change. Climate change is here. Alaska is warming faster than the other states. In the Copper River Basin, obvious changes include:

- Smaller, worm-infested salmon, with warmer waters a likely cause.
- Periods of high water lasting longer in the Copper River. This change, added to the first, make it more difficult for subsistence fishers to obtain the amount of salmon that have traditionally been relied upon.
- Brush line moving upwards on mountains. This provides less habitat for alpine species such as sheep, pikas, and marmots, and alpine-nesting species such as American Golden Plovers. It makes caribou and sheep hunting more challenging, and at the same time, it probably makes cross-country travel more difficult for caribou.
- More and drier fuels and increased fire hazards and impacts.

While some Alaskans remain complacent about climate change, it is critical that land planners integrate the anticipated effects of climate change in area plans. We urge you to enlist the aid of scientists in all fields and from other agencies and the University of Alaska in formulating an Area Plan that will allow the people and wildlife of the Copper River Basin to adapt to climate change. You should seek input from climatologists, ichthyologists, ornithologists, entomologists, mammologists, agronomists, soil scientists, hydrologists, glaciologists, and others. And Native tribes can provide valuable information about prior conditions and observed changes.

THE IMPORTANCE OF PUBLIC LAND:
Public land is a rare resource in many parts of the United States. Alaska is fortunate to have undeveloped public land, and we strongly believe that the vast majority of it should remain public. Locked gates and "no trespassing" signs will—if Alaska chooses to privatize its land—change the use patterns of those who previously used to hunt, fish, gather, recreate, and travel on that land.

There are also good economic reasons for keeping almost all state land public. Hunting, fishing, and gathering constitute an important non-cash income. Those activities, together with non-consumptive uses, also bring cash income to the region, in the form of purchased supplies, gasoline, and lodging. Expanding tourism opportunities on public lands can further contribute to the economy. Natural undisturbed public lands are a unique global resource which provides for clean water, wildlife habitat, wildlands, recreation, and scenic beauty.

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

Not only humans need land. Fish and wildlife do also. Public land provides vital refugia for climate change-impacted wildlife. Their habitats deserve protection.

Climate change and the multiple values of public land constitute the main themes of our more detailed comments, below. Some comments are repeated under different headings.

SETTLEMENT:

- **Wildlife habitat is an important priority, both for the sake of future generations of Alaskans and visitors and for the sake of wildlife itself. Selling and developing state lands are irreversible actions.** Caution and prudence are required before making any decision to sell off state land that wildlife needs in order to thrive.
- **Any residential land sales should be carefully considered and close to existing communities.** The old plan called for more communities. It is better to locate land sales in or close to existing communities in order to keep existing schools open, have more opportunities for local businesses and jobs, and have more walkable communities. Currently, there is a lot of land on the private market. New subdivisions keep appearing and lots keep selling, but when there is a scarcity of affordable land for young people, some affordable state land should be made available.
- **The Remote Cabin Sites sales program should be terminated.** Although these sites have provided some Alaskans with relaxing getaways and a closer connection with nature, or with the opportunity to pursue a more self-sufficient lifestyle, access is almost always by some form of motorized transport—aircraft, motorized watercraft, snowmachines, or ATVs—all of which use the fossil fuels that spur climate change. They also reduce wildlife habitat, adversely impact wildlife behavior, and pose problems for wildfire response.
- **Land sales should not impair public access to hunting and fishing areas; e.g., ridges that lead to sheep country, or rivers with salmon, or creeks with grayling.**
- **Residential land sales should have designated access roads which are delineated on suitable terrain and sustainable.** Poorly-sited roads can do great damage to habitats, especially fish migration creeks and other wetlands.

- **Land should be reserved for neighborhood and community trails and parks or greenbelts or open spaces.** Well-planned, attractive, and livable communities have these features. Several years back, lack of a community decision about what to do with such land in in the Kenny Lake Subdivision prompted DNR to sell it. In the future, community-purpose land should be held for these important purposes until a community is ready to use it.
- **Settlement areas should be at low risk for climate-change impacts, such as erosion and flooding.**
- **The first sentence of Goal 5 (page 2-24) should end with "especially renewable energy such as wind and solar."**
- **In the second sentence of Land Allocation Summary (page 2-29), add "climate change" to impacts.**
- **Delete Klutina Lake Area from Settlement Areas (page 2-30). Klutina Lake is prime bear habitat and is well-used by bears. This makes it unsuitable for settlement.**
- **Land surrounding Tonsina Lake and the Tonsina Lake Trail (Unit 14) should not be settled because of its importance to hunters.** This trail begins west of Richardson Highway Mile 74 and goes up the south side of the upper Tonsina River.

REMOTE CABINS (by permit, not sale): It appears that this program may already have been terminated, but if not, it should be—for the same reason as Remote Cabin Sites by sale (above).

TRAPPING CABINS: Trapping cabin permits should make clear that the permit does not provide a pathway to ownership and that the trapper has the responsibility to remove it when no longer in use; trapping cabins should not be permitted along non-motorized trails. Dogs—even those harnessed to a sled, leashed, or otherwise under close control—have been known to be caught in traps set directly on or very close to trails, and recreational users are hesitant to use the trails for that reason. (Please see our comments in "Transportation and Trails" on the importance of non-motorized trails.)

AGRICULTURE AND GRAZING:

- **In Land Allocation Summary (page 2-7), retain the statement that "Large scale agricultural projects are not proposed."** In the South 48, large-scale agriculture has resulted in remote ownership that does not respond to community concerns about water and pollution, noise, and odor. Monocropping generally requires heavy doses of pesticides and inorganic fertilizers and lack the wildlife benefits of edges that are found in smaller plots. Pesticides are a major factor in the loss of untold numbers of insects and almost 3 billion North American birds between 1970 and 2019. Birds and insects are vital parts of the food chain. Many native insect species are effective plant pollinators. Some large-scale projects in Alaska have failed to meet their goals and proved costly to the state.
- **Agriculture land sales should be of various sizes (but not large-scale, as noted above) to promote local and regional self-sufficiency.** COVID-19 has demonstrated the importance of having local food sources. All agricultural offerings should be suitable for crops that will grow well in our changing climate. (This is an example of where input from agronomists, hydrologists, and climate scientists would be valuable.) Like current agricultural offerings, they should have covenants to keep them agricultural. Some land with good soil should be small enough to be affordable to young people.
- **Preventing transmission of disease to wild animals should be a grazing guideline.**

WATER RESOURCES (STREAMS, LAKES, WETLANDS, GROUND WATER)

- **Water availability should be known to be adequate before any land sales are offered.** Quantity and quality of water needed for existing residences, farms, businesses, and wildlife—both now and as climate change intensifies—should not be impaired by new sales.
- **Water is actually a scarce resource in the Copper Basin.** Many people haul water because they cannot afford to go deep enough for water or because water quality beneath their land is poor. They depend upon community wells, and at least one of those (Kenny Lake Fire Department well) had to ration one summer. Both those people who haul water and those who do have good wells are anxious to protect quality and quantity.
- **Wetlands should be avoided in designing settlement areas and access to them.**
- **Willow Creek Watershed should be protected from development that would impair water quality and/or quantity.** This includes Willow Creek, its network of tributaries, Willow Lake, and Pippin Lake. Settlement and agriculture land should not extend upstream of the present agricultural sales in Unit 19, because access would cross the many small feeder creeks. Likewise, land north of the Edgerton Highway in Unit 18 contains Willow Creek source lakes, tributaries, and Willow Creek itself. Willow Creek Water Consortium is doing scientific studies of the Willow Creek Watershed. Copper Country Alliance is a partner of the Consortium.

FISH AND WILDLIFE:

- **Wildlife habitat is an important priority, both for the sake of future generations of Alaskans and visitors and for the sake of wildlife itself. Let's not rush to sell off state land that wildlife needs in order to thrive.**
- **Wildlife scientists in all specialties are recognizing the need for climate change refugia for everything from insects to birds to mammals like the altitude-dependent pika.** North facing slopes, which receive less sun and can hold snow longer are just one example of refugia. So are streams fed by cool groundwater. Refugia are badly needed. As we stated in the Agriculture Section, birds and insects are in decline. Climate change and other causes of habitat loss are believed to be two of the major factors (along with pesticides).
- **The Alaska Department of Fish and Game should be involved in this planning process.** The final revised plan should be signed by the ADFG Commissioner, just as the original was. The revised Plan should be a document that ADFG biologists believe meets the needs of fish, wildlife, and their consumptive and non-consumptive users.
- **ADFG should re-visit wildlife ratings for each Unit.** Biologists should look for new information about "Unrated" units and should re-consider whether any habitat still deserves a "C" (low) habitat rating. Notations beside the unit ratings suggest that in 1986, ADFG concentrated on moose, caribou, bear, and trumpeter swans, with one mention of osprey and eagles. Small game and non-game species are important to healthy ecosystems, too.
- **The first goal listed in Fish and Wildlife Habitat policies is too narrow, in that it does not recognize the value of wildlife habitat for maintaining healthy wildlife populations for their own good.** We recommend that you delete "resources necessary to maintain or enhance public use and economic benefits."
- **There is strong scientific evidence that many different species of animals—not just waterfowl—are impacted by high levels of acoustical or visual disturbances.** We request that you delete the word "waterfowl" from Fish and Wildlife Habitat Guideline B.
- **In guidelines H-3 and H-4 of Fish and Wildlife Habitat, regarding loss of habitat productivity to land use activities, please add "or consider denying a permit."**

- **Information that ADFG has gained over the past 35 years about anadromous and non-anadromous fish must be added for each Unit.** Area fish benefit people from Anchorage to Fairbanks and points between, especially Copper Basin communities. They contribute importantly to the wildlife food chain. All anadromous salmon spawning areas must be protected.
- **Eastern Denali Highway should be kept in the Planning Area. The highway viewshed should be closed to new mining claims. It should be recommended for inclusion in a future Tangle Lakes State Game Refuge** for protection of the Nelchina caribou herd and continued opportunities for hunting (except that the Paxson Closed Area would remain closed to big game hunting). For more information on the importance of the region and the refuge proposal, please go to https://www.savetanglelakes.org/

TRANSPORTATION AND TRAILS

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

little motorized use. We believe that if some areas were designated non-motorized, an organization could be formed to build and maintain non-motorized trails.

- **The Plan should identify and designate non-motorized areas or trails.** It should note suitability for non-motorized uses in the "resource information summary" for each unit. It should also make non-motorized areas and trails a goal.
- **The Plan should recommend means to identify public trails which have or should have trap-free corridors and/or which control the use, means, and location of traps along those public corridors.**
- **We suggest that the following areas and trails are suitable for non-motorized designation or recommendation:**
    - Tiekel River downstream of the Richardson Highway
    - A portion of the Thompson Pass area, at the north end, for both back-country skiing and hiking
    - Mile 62 Richardson Highway to Kimball Pass via telegraph route.
    - Perhaps another route or area within the Tonsina Controlled Use Area, which is already closed for motorized hunting from late July through September
    - A route on any state land along the north bluff of the Tonsina River, from the Richardson Highway bridge to the Edgerton Highway bridge
    - Mile 12.5 Denali Highway trail on the north side of the highway
    - South side of Denali Highway mile 3 to 4 within the Paxson Closed Area
    - Some non-motorized routes or trails in the Nelchina Public Use Area

RECREATION, CULTURAL, AND SCENIC RESOURCES:

- **In Goals (page 2-18) substitute "communities and neighborhoods for "population centers" and delete "major" from "major transportation routes."** As stated in the Transportation and Trails section, being able to recreate close to home is essential.
- **Maintained outhouses are a necessity for encouraging a tourism industry that will be a source of local businesses and jobs.** In recent years, the State has failed to provide and/or maintain adequate outhouse facilities. This is also a health issue, as human feces abound near highways and trailheads when outhouses are closed.
- **The Eastern Denali Highway and Klutina Lake should remain public because of their heavy use by fishers, hunters, and recreationists.** Add both of them to Recommended Legislative Designations (page 2-21).
- **Fire hazard should be among the concerns for Public Use Cabins and Private Recreational Facilities on Public Lands.** Human-caused wildfires constitute the majority of forest fires in the Copper River Basin, and climate change is already increasing the frequency of wildfires.
- **As discussed under our "Transportation and Trails" heading, more balance is needed between motorized and non-motorized access.**

FORESTRY

- **A mechanism is needed for the State, BLM, Ahtna, and Chitina Native Corp. to collaboratively keep track of the cumulative forest acres involved in planned and projected forestry projects (logging, commercial and home firewood, and biomass) on all Copper Basin lands.** This is important for keeping the take sustainable and avoiding unwanted impacts to other uses and to wildlife.
- **In Goals (page 2-13), recognize the importance of forests in capturing carbon.**

- **Likewise, in Land Allocation Summary (page 2-14), add "carbon capture" to major uses of forest land.**
- **Please add a Guideline (page 2-13) for protection of viewsheds and trails when harvest areas are laid out.**

SUBSURFACE RESOURCES

- **Oil and gas exploration and development should not be allowed.** Fossil fuels are the major drivers of already-disastrous climate change and are not the fuels of the future. Seismic lines, new access roads, and pipelines break up habitat for our important wildlife. Oil pipelines pose risks to our important salmon.
- **Mineral development should be the exception, not the rule, in allowed uses on various land blocks.** Large-scale mining, both placer and hardrock, impairs fish and wildlife habitat. ADFG should play a significant role in determining which units or subunits are unsuitable for mineral entry. If an area is too large for DNR to close to mineral entry through this plan, the plan should list it as unsuitable and make the recommendation that it be closed.
- **In Goals (page 2-31) reference to subsidization through infrastructure or other means should be deleted.**
- **Guideline B (page 2-31) should say that any <u>appropriate</u> mineral exploration should be "permitted" (not "encouraged") under lease and be properly sited.**
- **Where mineral entry is allowed, leasehold locations rather than mining claims should be required.** According to the DNR website (Mineral Property Records page), "State lands are designated for leasehold location only if there may be other valuable resources present or if the surface has already been leased or sold for other uses." We sincerely believe that *all* undeveloped state lands have "other valuable resources," such as wildlife (including nongame and small game), plants, clean air, and clean water.
- **Phase out Gold Placer Mining as an allowable use of state land.** Placer mining and associated roads and trails are destructive of the landscape; waters suffer from siltation. Zone more areas closed to mineral entry; phase out unsuitable areas now in use.
- **Mineral development should not be an allowed use within sight or sound of scenic highways.** Keeping our highways scenic is important to Alaska's growing tourist industry and to Alaskan travelers. Mineral guideline F should be strengthened.
- **The Denali Highway viewshed within Unit 28 is an example of an area unsuitable for mineral entry.** Subjecting Unit 28's important wildlife habitat and popular hunting, recreation, and sight-seeing area to further mineral exploration activities would be a poor choice.

MATERIALS: Please see our "Invasive Species" section.

BOUNDARY ADJUSTMENTS:

- **Eastern Denali Highway should be kept in the Planning Area. The highway viewshed should be closed to new mining claims. It should be recommended for inclusion in a future Tangle Lakes State Game Refuge** for protection of the Nelchina caribou herd and continued opportunities for hunting (except that the Paxson Closed Area would remain closed to big game hunting).
- **We support the Planners' 2016 ideas for expanding the Area boundary near Lake Louise, and also extending the southern boundary west to include Thompson Pass.**

INVASIVE SPECIES:

- **The potential for spreading invasive species of plants should be a consideration in framing <u>all</u> goals and policies.** Currently, contaminated gravel pits and road corridors are the big drivers of the spread of invasives such as white sweet clover. Airplanes and watercraft spread lake-choking Elodea. Require accepted invasive species Best Management Practices for all state operations.

Throughout the above, we have emphasized climate change, the great value of public lands, and how motorized uses and development affect both. We urge you to address these critical issues. We truly appreciate DNR's efforts to solicit public comment and look forward to working with DNR in updating the Copper River Basin Area Plan.

Sincerely,

THE BOARD OF COPPER COUNTRY ALLIANCE:

Cordova District Fishermen United
PO Box 939 | 509 First Street | Cordova, AK 99574
[redacted] | fax. (907) 424 3430
web. www.cdfu.org

September 8, 2021

Mr. Kevin Husa
CRBAP Project Manager
Alaska Department of Natural Resources
550 West 7th Ave, Suite 1050
Anchorage, Alaska 99501-3579

Sent electronically to: crbaprevision@alaska.gov

Dear Mr. Husa,

Thank you for the opportunity to comment on the Copper River Basin Area Plan Scoping. Cordova District Fishermen United (CDFU) is a 501(c)5 non-profit membership organization representing and advocating on behalf of the fishing families of the Copper River, Prince William Sound, and northern Gulf of Alaska. Our membership is diverse and our fleet participates in multiple fisheries for multiple species. Most who fish in our region reside in many communities around the state, but members of our fleet also include some out-of-state residents. CDFU's interest in submitting comments on this plan stems from our fishing fleet's reliance on the Copper River, and for the importance of this resource to our regional economy.

The key issues regarding the Copper Basin land management policies that we are concerned with are intact fish spawning and rearing habitat, trail system and recreational overuse, and mineral exploration and entry within the watershed. Further, CDFU requests inclusion in further discussions with DNR regarding the Copper River Basin, as our stakeholder members are significantly impacted by upriver decisions.

Recreational abuses along the Copper River during the summer dipnet season, particularly between the O'Brien Creek and Haley Creek section near Chitina have left damage and destruction, litter, and human waste in sensitive habitat areas, and we have concerns regarding how left-behind debris and riverbank damage may impact the future salmon runs within the Copper River Watershed. ATVs, including 4 wheeler and 6 wheeler traffic in spawning areas have led to further degradation, and should be planned for appropriately moving forward.

Additionally, given the significant impacts to spawning habitat and river channels that can be caused by beavers, we support a higher priority placed on maintaining comprehensive trapping access within the area, particularly surrounding primary tributaries within the Copper River

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system. In particular, the area surrounding Sinona Creek near Chistochina, as it is a major spawning area for Chinook salmon.

We encourage the DNR to work with ADFG to ensure habitat protections for areas surrounding lakes where increased and/or contaminated runoff may negatively impact spawning and rearing habitat. As climate change becomes more of a reality within Alaska, we share concerns of increased flow within the river system, impacts of erosion, as well as silty water and sediment interfering with eggs and fry. A watershed approach to management of land resources ensures that upriver and downriver communities both benefit and neither are negatively impacted by land management policies.

Further, we request that the Department of Natural Resources continue to inform, include, and engage the community of Cordova, and in particular, the CFEC-registered Area E Gillnet Permit holders, on any issues or updates related to the Copper River Basin Area Plan, as we are a significant group of stakeholders for the region. Our fishery is directly dependent on the health of the watershed and river system for our local culture and economy. Fishery businesses in Cordova make up more than half of the active private businesses within the community, with an estimated 80% of households directly benefited by Cordova's commercial fisheries.

Thank you for your time and consideration of our comments. Please do not hesitate to reach out to CDFU in the future with any questions or concerns. We look forward to working with you further on this matter.

[redacted]

[redacted]

MEMORANDUM
Department of Natural Resources

STATE OF ALASKA
Division of Forestry

TO: DMLW/RADS

DATE: September 8, 2021

FROM: [redacted]

SUBJECT: Copper River Basin Area Plan Scoping Comments

The Division of Forestry offers the following scoping comments for the Copper River Basin Area Plan, which are the same as our comments from the 2016 scoping period:

- We support identifying state lands appropriate for either primary or co-designation as Forestry due to local interest in utilizing biomass, timber, and firewood, and potential export markets.
- We support including consideration of a future Copper River State Forest into the draft.

Thank you for the opportunity to comment. Please feel free to contact me at [redacted] or [redacted] if you have any questions.

EYAK PRESERVATION COUNCIL

PRESERVING WILD SALMON HABITAT & INDIGENOUS CULTURE

September 8, 20221

Kevin Husa
CRBAP Project Manager
Alaska Department of Natural Resources
Division of Mining land & Water
550 West 7th Ave, Suite 1050
Anchorage, Alaska 99501-3579
Phone: 907-269-8129

Re: Copper River Basin Area Plan (CRBAP)

Dear Department of Resources,

Thank you for this opportunity to submit a comment / statement in this initial scoping process regarding a revise of the 2016 CRBAP.

The Eyak Preservation Council is a public charity with 501(c)(3) status based in Cordova, Alaska whose mission is: *to honor Eyak heritage and to conserve wild salmon habitat and culture through education, awareness and promotion of sustainable lifeways for all peoples.*

The Eyak Preservation Council offers educational and outreach programs that concentrate on the regional salmon way of life, indigenous cultural preservation and the promotion of sustainable economies. We represent communities and people of the Copper River, Prince William Sound and Gulf of Alaska watersheds and have program participants from this region and from the state and nation at large.

EPC wants to underscore that the existing CRBAP, which was adopted in 1986, has not been publicly reviewed nor commented on since. We would assume that this lack of review, analysis and scrutiny includes those by the Divisions of the Alaska Department of Natural Resources. We all must agree, much has transpired in the last 35 years.

Our first comment is actually a question: Who or what primarily made the decision, and when, regarding what communities and region would delineate the Copper River Basin water district for the CRBAP? How was that decision made? Was it based on geography, watershed delineation, recoverable resource potential? Possibly some ecosystem considerations? A historical answer to this is expected. Also, reasons why it was decided that Cordova should be in the Prince William Sound water district, and not the Copper River water district. Thank you.

The Eyak Preservation Council (EPC), based in Cordova, is impacted, along with Cordova and the entire community in every way and definition, culturally, economically, financially, subsistence-wise, tourism, recreation, lifestyle - by the Copper River Delta (basin) watershed. For the community of Cordova to not be included in the Copper River water district is in error regarding every one of the points mentioned in the previous sentence.

EYAK PRESERVATION COUNCIL

PRESERVING WILD SALMON HABITAT & INDIGENOUS CULTURE

EPC is firmly requesting that the DNR, and the public, take a serious regenerative economic and scientific review of the current geographic delineations of the Copper River and Prince William Sound water districts from a not only a resource but an ecosystem perspective. EPC recommends including Cordova into the Copper River water district, and, changing the CRBAP map. (An example is A. on page 3, courtesy of the CRWP)

Cordova is in an unusual geographic position. The Prince William Sound and the Copper River watershed/estuary meet and intertwine in the Gulf of Alaska. These monumental water systems are interconnected, and the life systems and all of the surrounding Alaska communities in Southcentral Alaska depend of the regenerative health of these water systems, that are also termed, Districts.

EPC' also wishes to comment and request that the Department of Natural Resources acknowledges that in the last 35 years the impacts and acceleration of climate change is a fact that must be included in considerations for all development considerations and plans.

The DNR's mission is: *"Develop, conserve and maximize the use of Alaska's natural resources consistent with the public interest."*

Possibly EPC must ask for forbearance in the current mission in these times of drastic climatic change, that DNR might consider what is best for not only the consistent public interest, but also to seriously include and consider the best consistent interest of future generations, translated as not short term financial yearly gains. The DNR Divisions are primarily based on the financial gain of resource development, stated so for the public. In the Copper River Basin, the regenerative sensitivity of the watershed MUST be included from a scientific and ecosystem perspective. This perspective is omitted verbally almost entirely in all the DNR Division descriptions.

There are several untapped natural resources in Alaska that are being overlooked that could well help the public interests and the state of Alaska financially with focus, consideration and investment. These would have far-reaching and exciting consequences. To utilize Alaska's powerful sun, wind and tides for the generation of electric power could provide a statewide and nationwide leadership opportunity for creative yet financially solvent development opportunities. These abundant Alaskan natural resources are waiting to be developed.

Thank you for this opportunity to comment on the initial phase of the CRBAP.

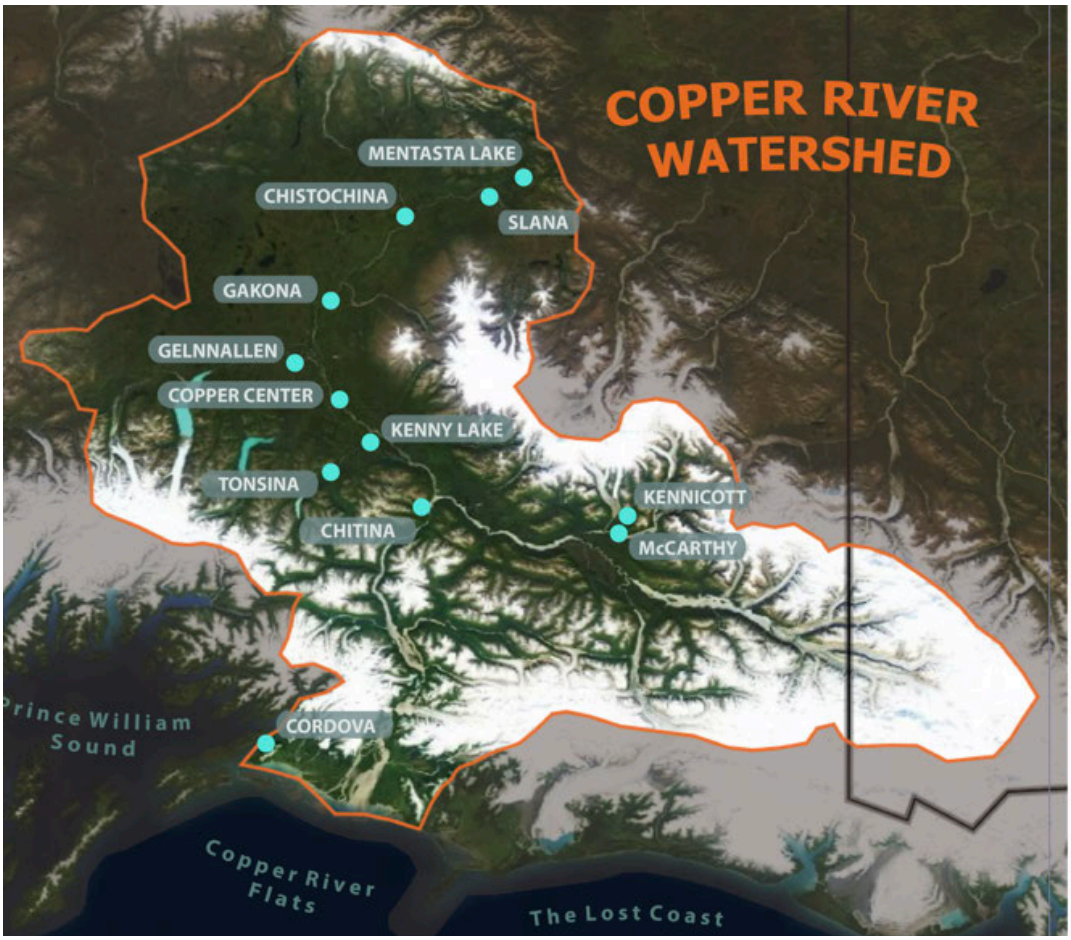
Sincerely,

[redacted]

EYAK PRESERVATION COUNCIL

PRESERVING WILD SALMON HABITAT & INDIGENOUS CULTURE

A.



09/08/21
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DNR AK
550 W. 7th Ave.
Anchorage, AK 99501

Re: CRBAP revision comment

Thompson Pass/TP, nestled in the ridiculously magnificent Chugach mountains outside Valdez, has been home for over 3 decades. Sir Edmund Hilary aptly and succinctly described the area, "unsurpassed beauty". Sadly the very entity, DNR, entrusted with managing this "unsurpassed beauty" is, in fact, time and time again, compromising its integrity and future viability.

DNR has failed for decades to comply with its guiding doctrine and now they, you, are summoning public input on the presumption of revising this doctrine, the Copper River Basin Area Plan/CRBAP.

Today, deadline day, I admit that I have tried and failed to refrain from commenting. My restlessness is unrelenting. I do not know how to pretend I don't care. So I will go through the motions like I have for the last few times that DNR has (falsely) initiated the CRBAP revision process. Kevin, Shawana and Jacoby, I will use this opportunity to provide perspective since you all seem to be coming into this revision with big hearts but little pertinent perspective. Positive change will not come without a knowledge of what has proceeded.

Most importantly, understand that Thompson Pass is an enchanted wonderland for everyone, not just for the outdoor enthusiasts who consider it a "hallowed ground". TP has transformed countless lives. It has mended intergenerational trauma, circumnavigated suicide, cleaned up a drug dealer, transformed a felon, nourished a new mother etc. The power of Thompson Pass is undeniable, sacred. The state knew its value as far back as 1970 when it funded a nearly 100-page study encouraging it's protection with a "scenic park" for "present and future generations". This land is the renewable asset capable of sustaining the physical, emotional and economic health of Valdez. And it has no computer to submit an online comment. So I will commence by sharing decades of perspective on the irrelevancy of both the CRBAP (I've had my own copy since pre-fax machines) and public input in Thompson Pass.

First clue, we are discussing a plan, the CRBAP, that states in its opening summary, "the plan will be reviewed every 5 years to determine if revisions are required (1-3)." It has never been revised in the 35 years since its inception.

Each time was going to be "the time" that changes would be made. Each time, DNR went through the expense not only to drop the ball but to have lost the ball. According to Kevin Husa, the project manager who was heading up the summer public meetings (I imagine that nearly a week's worth of travel expenses for three folks were substantial) that were barely attended (because folks have given up?), DNR has no previous comments with exception of the last round of comments that were submitted online. Perhaps they were vaporized like the big million-year-old release off of 27 1/2-mile glacier that I witnessed last week; it lingered just long enough for me to feel the nasal sting; as sensory tattoo. Last round, a handful of years ago, I submitted my comments via snail mail. I will electronically submit this round hoping that DNR doesn't catch a digital vaporization virus. This round I will skip the minutia that mattered to me the last few rounds and address a wider more compelling perspective. Like, **what is the point?** I ask not out of resignation but out of hope that the three new folks – Kevin, Shawana and Jacoby might shed new light on a nagging issue. There is

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an advantage to not being so enmeshed. I hope that by connecting some dots I can inspire the three of you to find a "third way" that I cannot yet see.

I met you at the Kenny Lake meeting this summer (because I was on the Copper River the day of the Valdez meeting). You were amiable and genuine. But, to no fault of your own, you were also sadly a stark metaphor for a broken system. I asked Kevin Husa, the CRBAP project manager, if he had noticed the eyesore [PHOTO]

in clear view from the Richardson Highway, the collapsed building on the DNR permit site at the bottom of Thompson Pass. He saw it. "Wish I would have known, we would have stopped". I explained that the permitee, Dave Geis of AK Snowboard Guides, is essentially squatting on the property. He has not paid his permit fees, user fees, insurance etc. I then asked Kevin if he noticed (also visible from the highway) the school bus at the Thompson Pass airstrip with garbage hanging out the window, power cords running to the generator, a wire running to the Copper Valley Telephone service stub, fuel and other miscellaneous junk scattered about [PHOTO]; priceless roadside real estate. He noticed.

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I explained that was a DNR permit site and that Dustin James AKA Dustin Huebner AKA the new face of Tailgate AK, had been living there over 3 months since his permit expired (about 4 months in total) without an outhouse, also squatting. Kevin said again, "Wish I would have known, we would have stopped". 2 examples should be sufficient to conclude the metaphor. Here you are, the DNR folks tasked with rewriting the management plan and yet you have no clue, no connectivity to the management area even when driving right through it. I attempted to respectfully share my frustration with the blatant disconnect at the meeting. **Clearly the system is broken**. Your intentions seemed earnest. Certainly the turnover and reshuffling practices of DNR contribute to the "disconnect".

How can we hyper-focus on dotting the CRBAP's "i's" when DNR has proven, time and time again, that they (the 3 of you are becoming "they" because you have not been a part of what I will be addressing moving forward) do not even see the letters, let alone the words, in the management plan. You are tasked with remedying a colossal conundrum. And perhaps I can help pack your toolbox. I propose that remedying the disconnect should proceed dotting the "i's" that DNR cannot see (wink).

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Re: CRBAP revision comment

Since you who are tasked with revising the plan are not privy to the deep and convoluted history, I will offer a severely annotated (more always readily available) synopsis. Perhaps a better understanding will facilitate a more responsible forward momentum.

DMLW'S THOMPSON PASS MANAGEMENT HISTORY
Thompson Pass's management logistics (severely abbreviated) are important to understand, particularly for the folks who are charged with revising its management plan (who do not have any knowledge of the area and it's unfortunate management history). The 1986 Copper River Basin Area Plan, CRBAP, which is in the process of being updated, "*describes how DNR will manage state land in the Copper River Basin*". The plan summary for Thompson Pass states that the lands should be "actively managed for recreation". The plan recommends that DMLW enter into a cooperative management agreement with Dept. of Parks and Outdoor Recreation, DPOR; and that a citizen's advisory board be formed to "propose management". There is no funding available (and never has been) to implement the agreement or the management. Not only will there be no management, but the land is also not regulated. Thompson Pass is even excluded from DMLW's 8/11 Fact Sheet "*Generally Allowed Use on State Lands*".

A State Park Citizen's Advisory Board was originally formed in the mid-nineties to no avail. Both the original and the most recent board, now several years ago, became inactive. The members were ready, willing and able to serve. But DNR's bylaws require that the state organize, staff and record the monthly meetings. And DPOR has failed to meet their obligations. The board was notified that it will no longer be supported. Valdez was "abandoned" due to budget cuts. A concerned board member reached out to John Hozey, a deputy Chief of Staff to AK's (then) governor Bill Walker. Hozey apologized, "*Sorry, wish we could do more, but it's getting pretty ugly everywhere."*

Nonetheless, all iterations of the board shared disillusionment induced by DMLW's deaf ear. The board always attempted to communicate to DMLW that, time and time again, **all Valdez user groups have been unanimously and adamantly against ANY commercial development in the Thompson Pass** corridor (recordings available). The Valdez high school students gathered the majority of their peer's signatures on a petition that stated, "*Commercial development is not appropriate for this area." The student who presented the petition addressed DNR "I am a 16-year-old junior at the Valdez High School. The future of Alaska does not want to see Thompson Pass developed.*"

There is only one other DNR document, besides the CRBAP, stipulating TP's management . The Thompson Pass Special Use Area, TPSUA, designation was created in 1994 in response to growing winter tourism. Its purpose was to protect TP's recreational resource value. The requirement of event/operator permits is, thus far, the only public stipulation. Still, DMLW has not required Tailgate Alaska to permit their competitions. In fact, DMLW is out of compliance with all of their obligations set forth in the TPSUA. For Example, ". . . at minimum an annual meeting should be held to ensure communication between the users and the agency is maintained." There has been only a

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Re: CRBAP revision comment

few meeting since the 1994 (or the 1986 CRABAP) designation and they had nothing to do with the TPSUA designation.

The most recent outrageous and downright tragic example of DNR's disrespect of Thompson Pass came directly from the commissioner herself. DNR Commissioner Corey Feige pressured the DNR staff to conditionally relinquish its' State selected land (specifically contingent on a transfer to the Chugach AK Corporation) at the Thompson Pass hairpin turn. Feige took the DNR staff by surprise. **From:** Stolpe, Adrienne K (DNR) on 12/7/20 **Sent:** Monday, December 7, 2020 **To:** Pinckney, Charles A (DNR) ,Hamner, Lacy C (DNR) **Subject:** RE: East AK RMP Amendment "As far as I am aware, we have no plans of relinquishing any selections in the area." Same day, Chuck (Charles) replies, "really just need to know if we had promised anything to them regarding our selections." Same day, Adrienne replies, "**As far as I'm aware, absolutely not. We've received pressure to relinquish lands for years and always push back. Unless something was promised higher up, which I doubt, I'd operate under no promise to relinquish** (Attachment DNR Research, p.77)". Next communication in the file was from politically appointed Commissioner Feige pushing forward the land exchange in a 1/27/20 letter addressed to DNR's Deputy Commissioner and to both the Director and Deputy Director of the Division of Mining, Land and Water. The letter included an attached draft land exchange contract prepared by the corporation and Commissioner **Feige stated, "Please look at the parcel and determine what would need to be done to lift the state selection . . . Thank you very much for your work on this"**. (Attachment: DNR Research p.28). The public was not notified or invited to comment.

Interesting, eh?, what happens when a private corporation who is currently exploring metal mining in 5 areas in the Chugach region (https://www.miningnewsnorth.com/story/2019/12/01/in-depth/purpose-tradition-guide-chugach-alaska/6080.html) reaches out to DNR's politically appointed Commissioner Corrie Feige who (not so incidentally) has had an oil, gas and mining consultation firm with her husband for the past couple decades. Feige was setting the enabling wheels in motion to allow for an exchange of Thompson Pass's most widely used winter recreation land for partially glaciated totally inaccessible mountain top land in the middle of the Wrangells . Worth noting, , "**land exchanges must be in the public interest".** (43 U.S.C. §1716(a)).

Against both the CRBAP and the TPSUA, the commissioner conditionally relinquished prime public recreation land [PHOTO]. The CRBAP's first line under TP "Management Intent" reads, " The management Unit should be retained in state ownership and managed for multiple use with emphasis on expanding recreation opportunities (3-103)." It continues by suggesting a legislative designation for mineral closure. In TP "the potential for conflict between minerals and other resources is high. The relative values of fish habitat or recreation (at these specific sites) are higher than potential mineral values and therefore warrant a closure (A-4). And the TPSUA states that "Adoption of a special use designation will serve to focus attention on affected state lands for their unique winter recreation values. Winter time use of the area will be reviewed and monitored by the Division of Land staff to better evaluate the need for more active management. Annual public meetings should be held to provide the public opportunity to comment on existing uses and to participate in future

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Re: CRBAP revision comment

management actions (p.3)". Commissioner Feige also overlooked the Special Use Designation statement indicating, "Any changes or modifications to the special use area will be subject to public review and comment (p.3)" before she signed over our prime public recreation land to make it available to a private corporation. **What is the point** of having plans and designations if DNR is not accountable to their guiding doctrines?

The "hairpin" zone is the most used ski area in the TP corridor for multiple reasons. It offers the only reasonably accessible south-facing terrain in the corridor. And because of its south aspect, it actually receives a bit of warmth in deep winter when temperatures are plummeting below zero. And when folks get off work and want to squeeze in a run in the last of the light, the hairpin is their "go-to". It is often protected when the rest of the corridor is being blasted by nuclear north winds. It offers the most family accessible ski area in the corridor. The lower angle terrain is both less intimidating and diminishes (not deletes!) the likelihood of avalanches. It is available to a wide range of ability levels because there are no crevasses or massive cliffs. There is no more user-friendly terrain than the "hairpin" in the Thompson Pass corridor.

It was an unlikely fluke that I caught wind, moments before the BLM deadline, of this ludicrous situation. And when I got word out, in a matter days, mostly between this last Christmas Eve and the day after New Year's, 143 folks (one representing 6,000 voices, another 10,000 and another 160,000) overwhelmingly sent comments to BLM (because the state had already signed the relinquishment), "**Not this land**!". Hunters, defenders of wildlife, motorheads and self-propelled recreationalist all stood on the same ground. "Do not give our public land to a private corporation!". For a more detailed explanation of this example: https://drive.google.com/file/d/1jGR5CeVHJ0eK6tE8kunpYsx9d9Vrg6dL/view?usp=sharing

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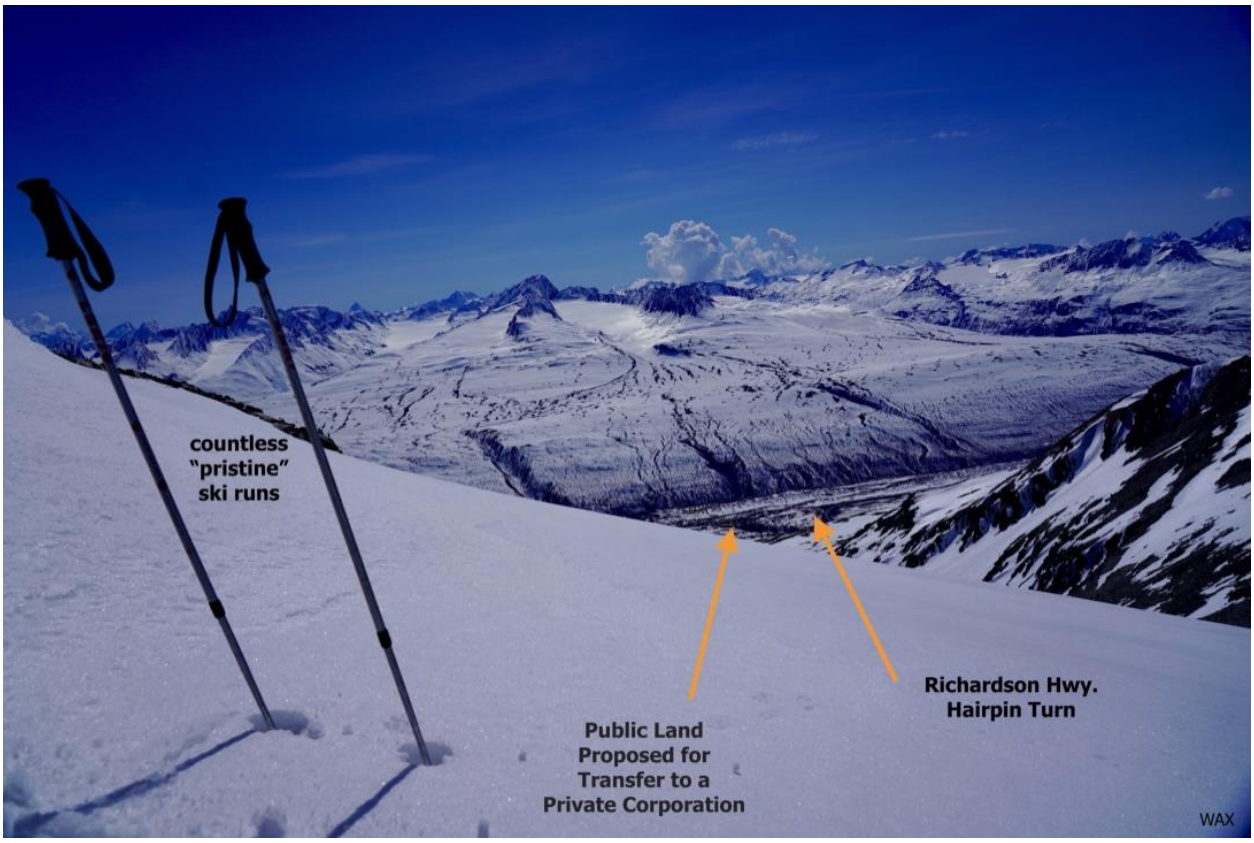

Both DNR's DMLW and most of its Thompson Pass permittees have histories of gross negligence in regards to compliance with their requisite guidelines. Examples of out of compliance permittees abound. Tailgate AK operated on state land without having any permit or business license for its first 4 years. Another Thompson Pass DMLW permit area, named the "*superfund site*" by Alyeska Pipeline's fire chief, the old Valdez Heli-Camps/VHC base, was a disaster for decades. A persistent stream of hydraulic fluid ran from the permit base across the Lowe River and to the top of Stone Mountain. They also built an illegal overnight cabin on Stone Mt. It took several years of my perseverance before the abandoned site's leaking diesel tanks, a leaking jet fuel truck, old truck batteries and collapsed, cracked-open Atco's were superficially cleaned up. DNR did not red-flag Matt White. Instead DMLW traded our Worthington Glacier state recreation site for inland contaminated Kodiak property so the Matt White, the superfund site provocateur, could build a private lodge. Local adamant opposition was ignored (recording available). After an exhaustive year, in a last-ditch effort, I gave the Kodiak Native Corporation a pile of paperwork which included numerous lawsuits against White, the same paperwork that I had distributed generously throughout DNR and Juneau, and they withdrew their backing. The project failed to materialize without financing.

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And then DMLW emailed only heli operators to notify them that the land was available, hardly a public process. And AK Snowboard Guides now squats the same property with a different collapsed building (mentioned previously in the introduction).

It's a sad never ending story. I could write a lengthy document solely on close-calls barely circumnavigated. Dean Cummings was awarded the right to close off public access at the "hairpin". But he kindly reversed his intention after reading a letter that I wrote. I barely intercepted DNR from giving another operator Deserted glacier where connexes etc. would have decorated the awe-inspring veiw driving southbound over the Thompson Pass summit. Kevin, Shawan and Jacoby, I sure look forward to any ideas that might take the pressure off me (and TP!).

DMLW's gross negligence enables its permittees gross negligence. Sadly even the word of DNR's commissioner can have no influence, no credibility. On 9/12/07 Thomas Irwin, the (then) DNR Commissioner, wrote in an appeal response that a connex was to be removed from the TP airstrip. Irwin referenced the CRBAP, *"The relevant management guideline says that all development along the Richardson Highway Corridor should be sited and designed to minimize impacts on views from the highway . . .".* Irwin continues describing allowable <u>seasonal</u> structures . . . "*All structures will be wood-sided with brown roofs . . .".* 14 years later the old connex still clutters the Worthington Glacier viewshed. And several years ago another connex grew next to it like an invasive weed.

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Re: CRBAP revision comment

And the access to the DNR's "crown-jewel's" parking is littered with 30 ragged signs about money. There are not even 30 parking spots. Truly a depressing welcome to a breathtaking place, the

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Re: CRBAP revision comment

Worthington Glacier.

Another Thompson Pass DNR Land Use Permit stated, "Removal or destruction of the vegetative mat is not authorized under this permit." Nonetheless, the property was bulldozed (as seen above). The permit allowed for one cabin. 7 cabins were put on the property. And then the same operator was awarded 2 more permits.

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Re: CRBAP revision comment

The growing eyesores have been authorized for 7-8 months on five-year permits with only 10 – 30 claimed user days annually. Permit application numbers indicate that one tour bus will potentially be more impacted by the eyesore (of a single permit site) than the total number of the permittee's annual clients. DMLW is aware of the blatant misrepresentation of daily user numbers by heli-operators. There are several Thompson Pass permits that have been issued and never used. Operators buy up permits to keep others away.

While I was in Juneau attending a Senate Resource Committee meeting, a resident from the north side of Thompson Pass phoned in to emphasize the quackery of DNR's permitting. He was referencing a recent "free and easy" local permit, " the accepted DNR application literally looked like it was filled out and compiled by a third- grader" (SENATE RES COMMITTEE -33- March 14, 2014). TP area permits are given out like candy on Halloween.

When hundreds of folks wrote comments (see Addendum 1/17 Public Tailgate Comments Annotated) to DNR in 2017 to protest Tailgate Alaska's TP permit, DNR awarded Tailgate a bigger better permit with 2 more weeks and an unlimited number of participants. It also included an unrestricted number of snowmachines, helicopters and airplanes. DMLW essentially gave Sullivan the right to own Thompson Pass' PEAK recreational and commercial user season for a month and a half-long "10-day event". For a mere $500 annual DNR DMLW lease fee Mark Charles Sullivan's limited liability company "Tailgate Alaska" had been purchasing the right to monopolize Alaska's most PRIME winter tourism real estate. The winter alpine access is unmatched in the entire world. This, by the way, also happens to be in the foreground of Valdez and the Copper River Basin's most visited tourist site and Alaska's most accessible glacier. The Worthington Glacier is described on DNR's website as a "*crown jewel*" of the Alaska State Park system. A bargain indeed

I sent DNR's Cliff Larson the below TP photo early April 2021 (of hot tubs and open fuel in a fish and mammal bearing stream that feeds into the Copper River) twice asking the same question, "Who is the contact responsible for protecting State waterways that contain fish and mammals?" I was never provided a contact. The hot tub continues to be in the same river every spring.

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Re: CRBAP revision comment

DMLW has the authority to issue permits/leases but has no designated people or plan to manage them. They are not only grossly imposing upon other, already strapped, state agencies (especially Department of Transportation and the Division of State Troopers) **but they are also imposing upon the public.** DMLW is enabling the decimation of their citizen's favorite "destination" and their potential winter tourism dollars.

DMLW has been enabling disrespect for Thompson Pass and its users for decades. Incomplete permits are issued, fees go uncollected, oversight is unseen, spills and other public concerns go unaddressed. **DMLW is clearly not poised contractually or functionally to take on ANYTHING in TP.**

Again, **the system is broken**. What is the point of spending time and energy rewriting a document that has been incessantly ignored? Why should hundreds of locals and tourists a day be burdened with an eyesore on their public land (on the account of DNR's incompetency)? I propose DNR start by investing it's energy into resolving the messes it has already enabled. And then? I propose DNR call an "All Systems Stop!". The state must stop issuing permits that they have no ability to enforce. It's like having a baby and leaving him/her/they in the street and walking away. Don't go there if you don't care and/or don't have the resources.

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The state is grossly out of compliance on the existing plan. Perhaps the public has a revolutionary idea for how to manage the TP corridor? Wouldn't it be lovely if Thompson Pass could be a model in management for the many other areas that are also feeling the squeeze of dwindling state resources? Setting an example is far more enticing than being a whipping post poster child. Hundreds of folks, from both Alaska and across the globe, have written to DNR about how they avoid, both personally and professionally, Thompson Pass. In the care of DNR, TP has evolved from arguably the most pristine paradise on the American road system to, according to one public comment (see addendum) , "a shitshow (sic)". Yes, we need change. But is another false start to a plan that has no bearing in reality going to initiate the change? Apparently I am not capable of giving up hope. But I am asking for both the public and DNR to get creative before it is too late. It is heartbreaking to watch DNR sabotage TP's recreation potential.

DNR's habitual negligence clearly indicates a need for more oversight not less. Failure should not be rewarded with the issuance of more authority.

After 3 decades of listening to both tourists and locals, I am certain that it is the endangered unspoiled vastness more than any single activity that draws folks to this area. Nestled between Thompson Pass and Prince William Sound, Valdez has the opportunity not only to become Alaska's recreation hub but to become North America's recreation hub. The Valdez gold rush went bust. The oil will eventually run dry. And even the fishing has, at times, become more . . . well . . . like fishing. But thankfully Americans spend $788 billion annually on outdoor recreation. Thompson Pass, if responsibly managed, is THE **precious renewable resource**, the ASSET, capable of sustaining Valdez's long-term health and economy. **It is poor public policy to give up unique-in-all-the-world public land for private profit** (and perhaps pillage?) particularly with the public investment that has gone into this area, this enchanted place that can't be reduced to words or pictures.

With enormous love for Thompson Pass,

[redacted]

p.s. I keep this quote on my desk, "He has a right to criticize who has a heart to help." – Abe Lincoln

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Addendum 1/17 Tailgate Public Comments Annotated

ADDENDUM 1/17 Public Comments Annotated

" It doesn't bring enough for the economy to outweigh the environmental impact on an already crowded Thompson Pass." [redacted]

"I attended Tailgate Alaska once, and found it not to my liking due to the amount and type of drug use and drinking combined with guns." [redacted]

"I won't attend TGAK again for several reasons. The years I attended the TGAK. The camp was dirty, the toilets over flowing, the party scene just wasn't my style. The drug use was off the chart within the camp during evening /nighttime hours. Skeet shooting was annoying and 24hrs of generators just takes the peacefulness out of the experience for me. It is totally irresponsible of the permit applicant to even request and increase of the magnitude. It shows how disconnected from reality TGAK organizers truly are regarding what impacts the region can sustain. TGAK operating over Spring Break would effectively end the opportunity to visit Thompson Pass for many people who only have that window of availability and like myself, don't want to attend TGAK." [redacted]

"I've witnessed first hand Tailgate and it truly is a 'shit show' I've been a resident of Valdez for 39 years and have been recreating in Thompson Pas for my entire life.... and I believe that this event has been a catalyst for negative change." [redacted]

"I see the Tailgate event as a barrier to the long term advancement of Valdez as a world class ski/snowboard/heliski/snowmachine destination." [redacted]

"I am sickened by the idea of giving absolute control to the only easy alpine access in this entire region to one person tor the entirety o the usable winter season. The 'festival' attitude of the participants has led to 4 near crashes where I was within feet of smashing (and likely killing) a snowmachiner who popped out of nowhere going full speed across the highway without looking... It can be a very toxic welcome or good- bye to the Valdez area." [redacted]

"The fuel and oil spills are particularly appealing, given the zero tolerance culture espoused in nearby Valdez and the Valdez Marine Terminal. The local standard for commercial activities involves containment for every vehicle, and remediation for every drop spilled. Tailgate has none of these safeguards in place." [redacted]

"Tailgate Alaska has grown into an embarrassment for the town of Valdez and for dedicated users of the area.... It is time to put this event to bed...many close-calls...The event of Tailgate Alaska creates a false sense of security and safety that enables novice users to go further and take greater risks than their skill – set would have them do otherwise. Again, Tailgate Alaska fosters wild-west, rape and pillage, unsafe and uneducated use of the Chugach mountains in and around Valdez and Thompson Pass." [redacted]

"The event threatens transportation safety and energy security. The Richardson Highway is a major transportation artery for the state particularly since the closure of the Flint Hills Refinery." [redacted]

"The partying culture has no place in safety in the backcountry." [redacted]

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"Does DNR really think it is in the states best interest to host an event of this type on state land?" [redacted]

"In the past, the Tailgate event has been a glorified party in a place where there are no rules and no one checking in. IT is a free-for-all not only in the parking lots and along the narrow roads, but also on the slopes, where avalanche dangers are not to be taken lightly. Backcountry skiing and riding require thoughtful trip planning and a limited number of people who are courteous and aware – Tailgate promotes the opposite…" [redacted]

"Over the past several years I have avoided the area during the Tailgate event, including several days before and after as it becomes an area overrun by people who don't appear to respect the amazing environment they are in. Ski routes become crowded at levels unsafe for areas without recreation focused avalanche control, vehicles travel the road at unsafe speeds, and the basecamp area is general mess." [redacted]

"This area is a special place and permitted users should be held to a higher standard. The environment that Tailgate Alaska is exploiting for money should be respected and protected." [redacted]

"Thompson Pass is one of the most special places in Alaska . . . I have visited over 40 locations and communities in Alaska teaching skiing> we need to protect our land and surroundings for future generations to enjoy." [redacted]

"Awful that the state even allows this guy to come to Alaska and do what he does. It's a public airstrip not a permitted drinking fest." [redacted]

"Tailgate does not consider environmental protection or sustainability." [redacted]

"This pollution includes dangerous human waste, oil and gas tanks , bags of garbage, burn piles and even scorched couches and snowmachines." [redacted]

"I was there last year afterwards and there were still piles of trash. Lumber, furniture, food and litter scattered about and human waste in abundance. I was shocked they could get away with that." [redacted]

"This permit allows for private groups to profit from use of public lands on a scale that is unacceptable for a local industry." [redacted]

"Keep in mind you have fully loaded double sets of tankers going through the pass at all hours of the night and alcohol driven snowmachiner and you're just asking for trouble." [redacted]

"We strongly recommend that ML&W deny this permit due to the many unanswered questions raised by the application and by the significant discrepancies between the permit application and the Tailgate AK website." [redacted]

"Thompson Pass is not only special to the skiers and snowmachiners of Alaska, it's arguably on of the largest and best accessible ski areas in the world by a road . . . lack of oversight, regulation, safety, environmental pollution, drinking, drugs, noise pollution…" [redacted]

"I have completely sopped visiting the area once Tailgate starts . . .. The time period for which they are asking is the absolute prime period for winter recreationalists in Alaska and makes it not only difficult but extremely unsafe for other winter recreationalists to enjoy the area." [redacted]

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"Tailgate Alaska chose to submit an application that was :arrogant because of the magnitude and scope of the request provided inadequate information to properly assess the impact of the event, and the late relative to the requested use date. Tailgate Alaska has shown little appreciation ,investment , and interest in the local community or the public lands they are proposing to use. As far as I am aware, Tailgate Alaska has never offered a discounted local admission , much less free admission for the local community. Inquired about this in past seasons and been told that it is full price for locals. Further they did not participate in the CRBAP or post a public comment. This demonstrates a lack of concern of real interest in the area other than profit. Based on the behavior of the applicant and the outpouring of public comment against this permit and the event in general please ensure the permit is not approved." [redacted]

" ….the 2017-2021 Tailgate application is excessively overreaching and lacks critical details and explanation." [redacted]

"It mostly provides a place to party." [redacted]

"While the Tailgate event is in progress I am forced to avoid the mountains surrounding the even, because I feel that my personal experience and safety are compromised. The Tailgate culture of safety in numbers is one that I do not agree with in the mountains. I don't agree with Thompson Pass and Tailgate becoming a destination party. (Tailgate web site comparing the event to Coachella and Burning Man)." [redacted]

"Over the years, the event has left a disastrous impact on the land. I have noticed that many of the event's attendees seem to disregard the standard of 'pack-out what you pack-in' and leave the areas that they occupy littered with trash and human waste. I have also noticed that at this event there is a lot of drinking and then driving of snowmobiles. As a recreationist in this area, this is very troubling. Their behavior puts many people at risk." [redacted]

"While the likelihood of a mass casualty event is increasing, so will incidents involving individuals and small groups. The state has a obligation to protect the public where and when there is sufficient reason. I believe such a situation exist on Thompson Pass. The last –minute application is nefarious and puts an undue burden on our state government for quick action. It provides little time to gather public input, review and make a decision. Asking for public comment on an incomplete permit application that will substantially change public recreation patterns is not acceptable. The chance of a natural or human –triggered avalanche engulfing many people will certainly increase if this permit issued. Human and terrain factors have finally aligned to cause this avalanche professional a debris pile of worry. Wastewater disposal – 'in porta-johns or in snowbanks for organic materials.' This does not work in refugee camps nor will it work at the current participant level or the levels proposed by Tailgate. 5. The permittee failed to give general locations or dates for "special" events related to their operation." [redacted]

"This permit would effectively amplify a-thousand-fold the already disastrous 'Tailgate Alaska' event." [redacted]

"What with the state of Alaska currently facing significant economic challenges, it would behoove the dept of natural resources not to take on this albatross." [redacted]

" I like to use the pass area in the spring along with a large group of locals I ride with and Tailgate renders the entire pass and Tsaina valley unusable" [redacted]

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". . . A recipe for conflict among the Valdez operators who are notorious for not being able to play well together….Ban the burning of pallets on the airstrip and parking lot and prevent Tailgaters from cutting the living spruce trees around the airstrip". [redacted]

"Simply put- this permit application is shooting for the moon…" [redacted]

"….the current problems with congestion in Thompson Pass need to be addressed before…." [redacted], [redacted]

"Tailgate is literally a 'shitshow'. Having visited the site several times over the past couple of years, I find Mr. Sullivan's event is marked by feces, urine and vomit…. Portable toilets overflowing or unacceptable and choose to relieve themselves all over the site with total disregard to public health . . . .. additionally I find the event is lax in safety and security, resulting in a debauched drunken event with little regard for public safety, avalanche mitigation and control, and general recklessness. . . . This event brings nothing but filth and flotsam to Alaska's pristine environment while becoming a prime candidate for a serious accident." [redacted]

" I reside in Valdez and leave to Haines during that season primarily because of Tailgate." [redacted]

" …During time of budget cuts its irrational and frankly unsafe. . . . the human excrement and detritus that remains after the party…" [redacted]
" The proposed use for this public access area presents safety, sanitation, and inadequate cleanup/restoration issues. In addition it limits the use of the public land…." [redacted]

" I have witnessed first hand the destruction and senseless acts of belligerent people and down right dangerous Tailgate events . . .. This festival to the locals is now called thee Mud the blood and the beer " [redacted]

"Every year the aftermath leaves a wound in Thompson Pass. The trash and human feces which are associated with Tailgate outrage me, . . . Every year at least one sled breaks down to burn or left along side countless pieces of trash in the Mountains. IF the operators and participates of Tailgate can't manage themselves now, why should the state reward them with a new permit? Especially one which increases their timeframe and numbers?" [redacted]

"…was picking up garbage this spring…. Tailgate is the worst at it. You walk through their parking lot and it is disgusting. Dogs tied up to RV's trash everywhere birds eating it. It's so sad. Please do not give this guy a permit to destroy my home." [redacted]

". . . a phenomenally irresponsible move on the part of our local government….Nothing but horror stories…. It was a bad idea in the past and expanding the scope (duration and capacity) is a horrible idea." [redacted]

". . . only a matter of time before there is a accident" [redacted]

"Valdez is my home and I do not like people coming from all over just to trash my back yard. They have no respect for the land." [redacted]

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"I vehemently conclude the application for Tailgate Alaska should be denied based on resource destruction, environmental degradation, and partying culture due to safety issues." [redacted]

"For years it has created issues at the pass while not benefiting Valdez." [redacted]

"I have personally been part of groups that specifically leave Thompson Pass while this event is going on. . . ." [redacted]

"Recently I have avoided the entire Thompson Pass area during the Tailgate festival because I find it unpleasant, unsafe, and unsanitary." [redacted]

"However, during the period when what would be some of the best recreation in the area, a rowdy party (Tailgate Alaska) has been allowed to occur on public land that has ruined the experience for me and many others I know. I typically try to stay away from the area during this period of time, and have had many instances occur that are unsafe due to actions by other snowmachiners, as well as the helicopter ski operators. These include snowmachines high marking above me and helicopter skiers being dropped off on top of me in avalanche terrain while I'm hiking. The thought…to expand is frightening to me. It would be a terrible idea to permit a event like Tailgate because it's creating more need for land management every year, endangering other area users, and damaging public land." [redacted]

"I really don't like going up to the pass when Tailgate is going on. . . . I feel is unsafe and an accident waiting to happen." [redacted]

". . . it could be fatal. Those people come up here from resorts in the lower 48 with minimal education about backcountry travel and safety. . . . it's a free for all. . . . a very bad idea!!" [redacted]

"…. Its impact to the community has become more negative than positive. The event presents our community with a number of safety issues each year, primarily an increase in recreational users who are unfamiliar with the area or with safe travel in avalanche zones, but also including public drunkenness, and intoxicated and otherwise unsafe driving. It is also associated with a major increase in litter and human waste on public land in the vicinity of the event. Combining a increase in the scale of this event with the recent reduction in potential law enforcement oversight of the area is a recipe for disaster." [redacted]

"I begun religiously planning my yearly visit to avoid this event, because it's just not what I want to experience up there. . . . We enjoy visiting Valdez and spending our hard earned dollars there. Don't force us to spend them in Canada!" [redacted]

"I have been driven out of Thompson Pass by the event itself by not feeling safe around so many people accessing avalanche terrain without regard to all users." [redacted]

"Tailgate Alaska promotes disrespect of public land, owned by all Alaskan's. I have had dangerous activity occur while I'm out backcountry skiing from snowmachiners high-marking above me. This reckless behavior is endangering." [redacted]

"To summarize my safety concerns, I feel large groups are incompatible with safety in Thompson Pass, which has high avalanche risk and heavily glaciated terrain." [redacted]

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"…. This would seriously alter the nature of Thompson Pass…" [redacted]

"Tailgate has become a traffic, sewage, environmental and safety hazard for local residents on this side of the state. It has done nothing for the local economy…." [redacted]

"As a local from Valdez I can only see this as an attempt to stop any other people from using it…. They have not shown to be good custodians of this majestic place." [redacted]

"The atmosphere has become so unruly in past years that I tend to avoid using this area for backcountry recreation during the event. … I have witnessed and been subject to some very unsafe situations involving snowmachines putting non-motorized users in harms way. The environmental impact is also huge. Sanitation and human waste needs be addressed. … Long after the participants leave the locals are left to deal with the waste left behind. … I'm an avid outdoor enthusiast and am dismayed at the lack of respect that these organizers and participants have for the outdoor spaces that they are recreating in. Thompson Pass is a special place for me and my family and I want it to be a place that future generations can cherish and enjoy." [redacted]

"I avoid the area during the party. There is the difference between the people that go to Thompson Pass for skiing and snowmachineing, and the kind of people that go there for Tailgate." [redacted]

"My family cannot even find a pull off or location to participate in a family activity without some speed demon flying by on their machine…. I beg you not to allow this to occur in our most cherished Thompson Pass." [redacted]

"I was shocked and saddened to hear about the potential expansion of Tailgate." [redacted]

"Please don't allow the privatization of Alaska's private spaces to grow at the expense of the individual user of these great resources." [redacted]

"I saw the garbage, human feces, and gas/oil dumped on the airstrip. But above all the biggest issue I'm concerned with is safety." [redacted]

"I would rather see more support for Valdez avalanche forecasting and mountain rescue than see another out of state for profit company selling out our resources." [redacted]

"But this request is poorly thought out and very little details are given on the planned use." [redacted]

"I'm against this lease. Only one Ak trooper stationed in Valdez. No Ak park ranger. This becomes a free for all. No sanitation, no security." [redacted]

"…. The Thompson Pass wilderness area and the abuse it has suffered from the Tailgate Alaska event…. Fecal matter and waste that has been left behind. At a point the wilderness cannot support an over abundance of individuals at a single time. We notice the degradation…." [redacted]

"It would be irresponsible to approve this particular permit." [redacted]

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"This proposal feels like an opportunity for Valdez's natural resources to be overused, trashed, and manipulated in a unacceptable manner. … The Thompson Pass is an area for the public to use, not to be restricted for profit use by an out of state irresponsible organization." [redacted]

"I enjoy visiting Valdez and skiing in Thompson Pass- although I avoid it during Tailgate. The current proposal would essentially mean that Thompson Pass would be closed to the general public due to an on-going party with minimal regard for sanitation or safety." [redacted]

"Spring break is a time to get out with Families and this event is an Adult only event and should not cover those times that are available to families." [redacted]

"I'm a backcountry skier and have had snowmachines ride right above me while skinning up creating a potential dangerous avalanche condition. For this reason I avoid Thompson Pass during Tailgate." [redacted]

"The resulting hazardous garbage and human waste is a blight on the area. This area is a place on the pass that is safe to take our local kids…. The existing amount of attendees causes my family to stay away during the festival. It is not family friendly in the least." [redacted]

"I make it a point to not visit the area during the time frame of Tailgate…It has become dangerous as snowmachiners are out riding above backcountry skiers as they are hiking uphill. The result will end up with an avalanche caused by the snowmachiners taking out the skiers. This has happened to me more than once in the area and has resulted in many people steering clear of the Thompson Pass during the time frame of Tailgate." [redacted]

"I am concerned about the increased risk due to human triggered avalanches with so many (and potentially inexperienced) people on the slopes, which is why I avoid returning to Valdez during Tailgate. I feel uncomfortable with lack of law enforcement and party scene…concerned about sanitary facility." [redacted]

"….during this time period I try to avoid the Thompson Pass area. … Tailgate event is held during the optimal time of year for snow conditions and daylight for all snow enthusiasts." [redacted]

"The concerns I have for the festival are the garbage and the safety of the skiers in the pass. …I don't want it to be a death for the wake up call." [redacted]

"This festival already adversely affects the users of Thompson Pass as well as the public services of Valdez…" [redacted]

"Myself and my clients over the years have seen the size and influence of the Tailgate Alaska event grow in size and impact, and unfortunately already feel the size and scope of the major recent gathering is starting to have a severe detrimental effect on the environment and general quality of the recreational opportunities…." [redacted]

"The first thing we now do before planning a trip over there each spring is find out when it is happening, so we can avoid it.
As there is little to no regard for avalanche safety among the participants, or regard and respect for others. If you show up after its over, you get to see their trash they left." [redacted]

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"There have been several incidences of drones flying over while we had rotors spinning which is so dangerous and again due to lack of respect. There are never enough clean toilets…."
[redacted]

"I will never ski unarmed in the pass ever again…" [redacted]

"Once I was assaulted by a Tailgate attendee, who bit my left shoulder. It was scary and it could been much worse. I am no longer left alone at our camp during the week of Tailgate…. Tailgate partiers go deep into the territory without preparedness. We have answered many phone calls for assistance or rescue from the Tailgaters." [redacted]

"I have also seen the influx of Tailgate traffic scare away countless clients who choose to heliski in Canada or other locations because of the chaos and devastation to the snow that Tailgate leaves in its wake." [redacted]

"The magnitude and duration of this permit allow for unprecedented visitation numbers in an area with no infrastructure, regulation, and growing controversy and congestion. It would be irresponsible and a liability for a state agency to permit this amount of visitation without first securing funding for, and implementing, a management strategy…. Its seems quite unreasonable and a great imposition to the residents of Valdez and the surrounding area." [redacted]

"The people expand to both sides of the road and are constantly stumbling across the road with no regard for traffic…. Somebody is going to be killed…. Lengthening the event is unfair to other local event sponsors that need that area also. Extending the quantity of people allowed is insane, impractical, and destructive due to the lack of cleanup…." [redacted]

"…Local educators were not paid by Sullivan last year for their professional services and will not be returning. The event rents backcountry avalanche gear to participants (shovel, probe, avalanche beacon) these are things that any back country enthusiast owns and carries with them…..Our local food bank has said that TG participants have cleaned them out of food, meant for the needy in our community." [redacted]

"… And if I or someone near me gets killed by somebody else's ignorance or powder fever, I'll consider both organizers and land use management that allows for massive influx of people in congested terrain as bearing some of the responsibility for that tragedy to occur." [redacted]

"We as a family no longer visit Valdez during or after this even due to its destruction…The amount of trash, destruction and misuse of the area is already a disgrace." [redacted]

" The general opinion of Valdez through participants' perspective is zero interest in what the town has to offer and general avoidance at all costs. It saddens me to hear these opinions coming from a tourist group that use the town's facilities only on a desperate basis." [redacted]

"I have witnessed first hand as a past participant of Tailgate the overly crowded camping areas, overflowing toilets, skeet shooting by participants who are clearly intoxicated, synthetic drug usage, and left garbage in and around the permitted area."
[redacted]

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"I have worked on the Tailgate Alaska safety team for two season and have a very good idea of how this event is (dis) organized." [redacted]

"The residents and users of the Thompson Pass area have watched this event grow over the last number of years. At first, this event and these people were welcomed by our community, The behavior of the organizers and participants of Tailgate Alaska slowly turned public sentiment to reluctant tolerance, Finally after realizing this event I simply a burden on local resources, the environment and the community, the public sentiment has turned to strong opposition. In the new application, Tailgate Alaska is requesting to be allowed to continue to run their business on public land, while expanding their burden to 3000 people for 90 days a year for 5 years. No public sympathy for this business remains, only intolerance.

The marketing of the Tailgate Alaska event, to non-Alaskans by non-Alaskans has been the main contributor to the overcrowding of Thompson Pass during March and April. The overcrowding in turn had created conflict amungst(sic) individuals and user groups. The promotion of this event brings far more inconsiderate people to Thompson Pass than just those purchasing tickets. The State of Alaska should not have to carry this financial burden and neither should the local community have to surer the monetary and social problems created by this for profit event held on public land.

The State lacks resources to properly police and provide for the needs of Tailgate Alaska, and the organizers have proven they don't have any intention to do so themselves. A side from the environmental, safety, and infrastructure problems Tailgate Alaska has created, the dirt bag party culture this event promotes in advertising and on social media is not something the State should allow or the local community can tolerate. The overt use and glorification of hard drugs, such as meth, heroin, pcp, and cocaine, is reason enough to put an end to Tailgate Alaska.

In short, Mark Sullivan and Tailgate Alaska have been given the opportunity to run a business on public land that at the very least has benefits to the public equal to the burden it creates. They have failed." [redacted]

" My experience last year during tailgate was unpleasant. I pulled into the tailgate lot to look for a friend of mine who had to stay up there for 2 nights until I got home from working in the slope. The entire parking lot was a muddy, garbage filled mess. The residents of the parking lot who sauntered over to speak with me were unable to communicate due to drugs and alcohol. I made my way to the non-permanent cabin and found my friend. The residents were very friendly and welcoming offering me LSD, mushrooms and alcohol. I declined, obviously, I was told a story about previous season when one of the partiers attempt to ride his snowmobile to the top of Skatepark, but had been consuming LSD for the last 36 hours and couldn't make up the pipeline hill. This was very hilarious to everyone, but not to me. Thats's a real issue for the other people try to go up and down the hill. I left with my friend as soon as possible. She mentioned that there was a rave in "camp one love" that night and asked if I wanted to come back….no, I don't!
After a few weather days , we went back up the pass to ride Loveland, It was a somewhat cloudy day but conditions were good enough to finally get in some laps. After breaking trail with our group of 6 we were able make our way to the top! The snow was excellent at the top but crusty at the turnaround. On my way down after dropping off my friend there were 12 sleds lined up side by side blocking the trail at the bottom of a choke point. No easy way around them. I pulled up between 2 of them and realized immediately that I knew them, Tailgaters, the ones offering drugs a few days prior. I said Hi, rolled my eyes and continued on to the turnaround at the bottom. On my way down, I saw all sorts of messy carnage. Dogs running around on the hill with no apparent

09/08/21
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DNR AK
550 W. 7th Ave.
Anchorage, AK 99501

Re: CRBAP revision comment

owners people with no skills doubling on very old snow machines and struggling to get up in the powder and skilled riders paying no attention to the uphill vs down hill traffic in the choke points . Good times. I made it to the bottom , picked up my friend and started back up hill. As I approached the choke point on the first pitch, I noticed that a snow machine was coming down at me. Shit!!! Okay here we go, hold on. As we side hilled up off the trail to get out of the way, I noticed that this snowmobile does not have a rider!!!! And it is barreling downhill at all my friends!!!!! Who would be such and idiot as to attempt to ghost ride a sled down a busy uptrack? Well, I saw him once I crested the hill. He was standing in the snow in a flat spot looking very confused . When I asked WTH?! His response, in very broken English, was that he fell off… in a flat spot?! And his machine managed to turn itself around!?! And he was unable to stop it!?! What about your tether (safety device)!? Nope,,, he was clueless. Someone rented this guy a sled and he was trying to get to the powder. This was infuriating to me, if you want to be an idiot, do it somewhere that does not put my friends and I in danger! If I had not been a confident snowmobiler with 10 years riding experience, that would have been a very messy head on collision." [redacted]

"The climate of Thompson Pass is changing and I believe the Tailgate function is a major driver in that…a burden Thompson Pass should not have to bear." [redacted]

"I have photos of the toilet paper hanging in the bushes, piles of feces, and just nasty stuff right next to the creeks…there have been snowmobiles left to rot, couches, furniture, bbq grills that broke, all sorts of odds and ends left from the impact of the festival. I have seen their snow-cat track and push snow into the creek that is outside their permitted zone. What happens when there is a fire in the airstrip? How does having only one way in or out work with emergency vehicles… looks like a giant bottleneck to me. It leaves everyone else that comes to the pass to recreate with hardly a good safe option. With that many people being piled up at a festival in such a tight small resource is asking for trouble. It's not a matter if but WHEN someone is going to get hurt. …vehicles have to dodge planes on the road…and he took advantage of me like he does many people. This event is suffocating us." [redacted]

"And I have participated as a vendor in the pass for four of the past eight seasons that Tailgate Alaska has been there. I have not found that the bulk of the customers tailgate has brought in spent much time or money on our town. … the human wast still piled up in areas, and the food and beverage trash left behind was significant. Fore rings with glass, nails, and other nonbiodegradable bits of thngs could stillbe found on the airstrip after the snow melted in May." [redacted]

"I'm a European based ski guide who has previously brought numerous clients to ski in the Thompson's pass and Valdez area… We've historically timed our visits to avoid the current tailgate gathering to avoid the excessive crowds and snow machine noise." [redacted]

"Feedback I have coming in from the Valdez community is they have grave concerns with Tailgate Alaska environmental impact on the area they utilize. The users of Tailgate park and live up in his permitted area and across the road from it, and only a few enter the town to obtain food supplies but not enough to create a significant economic impact to the town businesses. … wish to ensure the reputation of DNR, The State of Alaska, the City of Valdez and the funds invested into marketing and encouraging Tourists to the area receives no further damage, plus more importantly the Chugach Mountains itself along with the Worthington Glacier is preserved for long term use by all who live and visit here, and finally no loss of life to anyone using the Richardson Highway at the time of this event." [redacted]

09/08/21
Kevin Husa, Shawana Guzenski & Jacobie Gable
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550 W. 7th Ave.
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Re: CRBAP revision comment

Booth, Ruth A (DNR)

From: [redacted]
Sent: Wednesday, July 21, 2021 11:15 AM
To: Copper River Basin Plan Revisions, DNR MLW (DNR sponsored)
Cc: Cooper, Douglass
Subject: USFWS Response: Copper River Basin Area Plan

Hello Alaska Department of Natural Resources,

Thank you for the opportunity to provide initial scoping comments on the Copper River Basin Area Plan (CRBAP). As the State embarks on drafting a new CRBAP, the U.S. Fish and Wildlife Service (Service) is happy to provide technical assistance. We are interested in landscape level planning and this 15.9-million-acre area provides a huge opportunity to consider large-scale conservation planning.

As the State develops the draft CRBAP, the Service is happy to be involved to the level appropriate. Based on a review of the 1986 CRBAP, we identified opportunities to update the threatened and endangered species section, craft management goals for invasive species in the area (invasive species are not mentioned in the existing plan), conserve migratory bird and fish habitat, and more.

Please let us know how we can assist the State as the plan develops further. We did not attend the recent community planning meetings, so any additional information or schedule updates you are willing to share would be appreciated.

Cheers,
[redacted]

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[redacted]
Alaska Region, U.S. Fish and Wildlife Service
[redacted]

Wellwood Conservancy
HC60 Box 227 • Copper Center, AK 99573 • [redacted]
"Place-centered, world-focused"

4 September 2021

Kevin Husa, CRBAP Project Manager
Alaska Department of Natural Resources
550 West 7th Avenue, Suite 1050
Anchorage, AK 99501-3579
Email: crbaprevision@alaska.gov

Re: Copper River Basin Area Plan Revision

Kevin Husa and Other Land Planners:

I appreciate the opportunity to submit comments regarding the Copper River Basin Area Plan Revision. I care deeply about this region, having lived here for several decades as a land owner, business owner, and teacher. I am retired from 19 years teaching science at Kenny Lake School. I currently serve as a board member for two local nonprofit organizations Wrangell Institute for Science and Environment and Copper Country Alliance and am the volunteer Executive Director for a third, Wellwood Conservancy. For ten years I have coordinated a field research project gathering data relating to the local Willow Creek watershed.

My concerns regarding the Copper River Basin Area Plan center especially on the continuing vitality and ecological health of the Willow Creek watershed. Willow Creek flows from just south of Copper Center southeasterly to the Richardson Highway, then between the Old Edgerton Highway and the Edgerton Highway. The creek crosses the Edgerton Highway immediately east of Kenny Lake School. From there it continues meandering southeasterly until it empties into the Tonsina River.

Land owners along the course of Willow Creek include Ahtna Native Corporation, Chitina Native Corporation, the Copper River School District, a number of private owners including the Wellwood Nature Preserve with which I am associated and the State of Alaska. The State of Alaska owns large portions of land around the source of Willow Creek, and most of the land south of Kenny Lake School and Wellwood Nature Preserve downstream toward the mouth of the creek.

In my role as coordinator of the Willow Creek Research Project I have been involved in the systematic measurement and recording of such parameters as volumetric flow, water temperature, and conductivity. Ground temperatures have been measured at depths down to 2 meters, and some monitoring was begun of groundwater resources, using a number of local wells. The focus has been on factors that affect the quantity and quality of water, both surface and subsurface.

Willow Creek, though it's watershed extends over 100 square miles, is a relatively small stream, reflecting the overall low rate of precipitation in the region. Unlike the major rivers nearby, Willow Creek does not receive water from snowfields or glaciers; its flow is completely dependent upon local precipitation. In its downstream portions, south of the Edgerton Highway, some of its flow goes underground into porous substrate. During dry periods, this may deplete the surface flow entirely, resulting in the death of commercially valuable salmon fry and other aquatic species. I believe this intermittent character calls for great care that the present sources of water are not compromised.

Upstream, the headwaters of Willow Creek comprise multiple small channels. These channels converge into a single channel before the Creek crosses the Richardson Highway.

Through much of its course, Willow Creek flows through marshy terrain. Beaver dams play a large defining role in the hydrologic characteristics of this region as moderators of flow, as reservoirs of water during dry seasons, as habitat for grayling and young salmon (silver and king), and as oases for wildlife. The periodic flooding caused by the dams also serves to restart the cycle of ecological succession, renewing habitat for browsers and grazers such as moose and snowshoe hares.

Willow Lake and Pippin Lake are the two largest water reservoirs in the Willow Creek watershed. While research data is not yet complete, it appears likely that these two lakes are important in supplying water to underground aquifers on which local wells depend.

Of critical concern is the upstream region of Willow Creek, where flow in the multiple streams and small channels would be easily disrupted by human activity, especially the building of access roads and lanes. Our measurements show that this is a region of permafrost, with frozen ground existing year-round at a depth of about 1 meter at our monitoring station. This permafrost, by forming an impermeable barrier, likely plays a very significant role in maintaining surface water and flow in the upstream channels, which feed all lower portions of the creek. The clearing of forest, essential to human development, could result in the melting of this permafrost, causing disruption and reduction of flow.

Because of this, *I urge that this upstream region of the Willow Creek watershed* whose northern border is the southern edge of the Klutina River gorge, and which extends southeastward to the Richardson Highway *be set aside, reserved from human alteration*. It seems far preferable to prevent problems before they occur, rather than try to correct them through regulation and oversight after-the-fact, or suffer the loss or degradation of the Willow Creek watershed for future generations.

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

I strongly urge that this Tonsina Bluff Trail be kept in a natural state, available for the use and enjoyment of future generations, as it has been for generations of the past.

Attached is a map of the Willow Creek watershed, showing areas referenced above.

Thank you for your thoughtful attention to these comments and to these important issues.

[redacted]


USGS HUC 12 Hydrologic Units
Willow Creek Watershed Total Area: 103.5 Sq. Miles
For more information on hydrologic units, visit: http://water.usgs.gov/GIS/huc.html
Watershed Boundaries Subject to Modification
Trans Alaska Pipeline
Richardson Highway
Copper River
Headwaters Willow Creek
Willow Creek
Willow Lake
Willow Lake-Rock Creek
Rock Creek
Outlet Willow Creek
Edgerton Highway
Tonsina River
Pippin Lake
Dust Creek
N
0
2.5
5
Miles