

Copper River Basin Area Plan – Issue Response Summary

Subject	Issue Summary	Response	Recommended Revision
Agricultural	Requesting additional Agricultural lands within the area plan and support for developing the Agricultural industry.	Provide a reserve of land for agricultural use to support the local and regional production of foodstuffs necessary to support the citizens of Alaska in the future. Known as food security, this goal recognizes the potential variabilities of worldwide food production and its distribution in the future and indicates the state’s intent to ensure a continuing agricultural land base. Division of Agriculture is apart of the planning team and involved in determining units appropriate for Agricultural development.	None.
Agricultural	Agriculture development in the Copper Basin does not generate a benefit to the State of Alaska. Wetlands should not be designated as Agricultural lands. They are a natural carbon sink that loses its function when cleared for Agricultural development. Mile 93 of the Richardson Highway is an example. Do not resell previously sold/granted Agricultural settlements.	Provide a reserve of land for agricultural use to support the local and regional production of foodstuffs necessary to support the citizens of Alaska in the future. Known as food security, this goal recognizes the potential variabilities of worldwide food production and its distribution in the future and indicates the state’s intent to ensure a continuing agricultural land base. Division of Agriculture is apart of the planning team and involved in determining units appropriate for Agricultural development.	None.
Carbon	I believe the sale of carbon-offset credits is now a recognized source of income from State land. Please do not allow the sale of carbon-offset credits in areas W-16 and W-17 when you update the plan. These areas are the only larger sections of land in the McCarthy area which can be utilized for commercial timber harvesting, gravel sales, land sales, and other industrial type uses.	The Carbon Offset Program is a new program authorized under AS 38.95.400 - AS 38.95.499. Any potential Carbon Offset projects will have to be consistent with the guidance of the plan.	None.

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Carbon	It came to my attention that the State is considering Carbon Management and Monetization program as part of the land management options for the future. This program is in alignment with the values and purposes of Wrangell-St. Elias National Park and Preserve and I encourage you to consider this opportunity in your plan.	The Carbon Offset Program is a new program authorized under AS 38.95.400 - AS 38.95.499. Any potential Carbon Offset projects will have to be consistent with the guidance of the plan.	None.
Carbon	Plan needs carbon capture language.	Carbon capture language added in the revised plan.	Carbon capture language added in the revised plan.
Classifying lands	Why has there been a large increase in Public Recreation Land and a decrease in Habitat land.	Recreation is a popular use of state land. The plan proposes designations to manage lands for recreation in several locations where recreational use is extensive. Where appropriate, these uses are recognized in the management intent statement for a unit where recreation is particularly significant and widespread or where it is important to recognize this use. Those areas with a significant recreation use or potential use are designated Public Recreation-Dispersed.	None
Classifying lands	Disagree with how land is classified in W16 and want DMLW to have another look.	This unit has been broken into smaller units containing Resource Management Land and Settlement Land.	This unit has been broken into smaller units.
Classifying lands	Remove my property for plan changes.	The CRBAP is the land use plan for state-owned and state-selected lands within the planning area. It provides the basis for management of state lands and resources and affects all authorizations issued by the ADNR. While the CRBAP does provide plan designations and classifications for units with mixed land ownership, the CRBAP does not apply to private lands.	None.
Classifying lands	Do not propose any new settlements in or adjacent to non-motorized hunt areas. This would negatively impact wildlife and reduce the area available and opportunities for non-motorized hunting.	A variety of things are taken into consideration when lands are classified as settlement including the impact on wildlife. The actual siting of potential subdivisions is a separate and subsequent process.	None.

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Classifying lands	Unit H-21 (formerly Subunit 23A) is not suitable for settlement.	Unit H-21 is designated as Settlement Commercial. The Glennallen solid waste site is within this unit.	None.
Classifying lands	DNR should develop a water management plan for Moose Creek to control the flooding in Glennallen.	The plan classifies land and provides general management intent for state lands and waters. A detailed water management plan is beyond the scope of this plan.	None.
Classifying lands	Many other designations were also compared with minimal differences found (Materials, Minerals, Heritage Sites, etc.). The only other major proportional difference was within the Resource Management designation. In 1986, 14.59% of the area was designated RMG, whereas that number has now risen to 22.04%. Your definition of Resource Management is equivalent to General Use, or no specific “value” found so the land can be used in any way that is in “the best interest of the state.” My question is why has there been a 7.5% increase in RMG designation, especially when all of the plots are within caribou and/or moose ranges, and should be considered in wildlife management and not left in a vulnerable position for the state to do what they wish?	The boundaries of this plan were expanded to include new areas that the 1986 plan did not address. Additionally, since that 1986 plan much of the previously state selected lands have been acquired from the federal government. Resource management land can be land that might have a number of important resources but for which a specific resource allocation decision is not possible because of a lack adequate information or because the land is remote and development is not likely to occur within the next 10 years.	None
Classifying lands	I hope this plan revision can make more meaningful and informative land classifications using data and information already available. Considerable work for land capability assessment was done for DNR in 1980 for most of the McCarthy W-16 designation. Terrain analysis at 2"/mile (1:31,680) had interpretations for remote parcel, rural subdivision, agriculture, forestry, sand and gravel, and groundwater. The 1986 plan segmented the McCarthy planning block into 4 categorical primary uses with cartographic detail units of 1 to 8 sections in size. 37 years later the current plan revision proposes to lump all of that into one giant unit, W-16 Settlement, except for two small W-17 units for material sites.	The best available data was used in the development of this plan. Based on further input from the public and other agencies, W-16 will be revised into smaller units, see above.	Based on further input from the public and other agencies, W-16 will be revised into smaller units.

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Classifying lands	Expand the Archaeological District by designating additional lands to protect resources on nearby State lands and co-manage the District with the BLM.	Management intent for unit H-7 states - Unit is to be managed for the protection of the heritage resources consistent with the requirements of ADL 228296 and 11 AAC 96.014(b)(24) for the Tangle Lakes Archaeological District Special Use Area. Retain in state ownership. Unit H-8 is in selected status but, if conveyed to the state, the plan recommends for TLAD expansion.	None
Classifying lands	Reconsider how lands are classified.	<p>The designation of Public Recreation Dispersed was removed from unit O-6. Its sole classification is now set to Settlement Land.</p> <p>Unit O-9 was classified as Public Recreation Land, Wildlife Habitat Land, and Settlement Land. This unit was broken into two units O-9A classified as Settlement Land and O-9B classified as Public Recreation Land and Wildlife Habitat Land.</p> <p>The classification of Wildlife Habitat Land was added to unit H-37. The unit is now co-classified as Public Recreation Dispersed and Wildlife Habitat Land.</p> <p>Unit H-48A was added and classified as Forest Land.</p> <p>Unit H-54 was changed from Reserved Use Land to Public Recreation Land Dispersed.</p> <p>Units W-2 and W-3 were changed from Resource Management Land to Public Recreation Land and Wildlife Habitat Land.</p> <p>The classification of Public Recreation Land was removed from unit W-10. Its sole classification is now Forest Land.</p> <p>Unit W-16 was classified entirely as Settlement Land. It has been broken up into unit W-16A classified as Resource Management Land, W-16B Settlement Land and W-21 Settlement Land.</p>	Changes were made to multiple units.

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Environment - General	2-62, 6. "Provide opportunities for the exploration and development of non-metallic minerals such as coal . . .". Has DNR not read the memo that coal is dirty and barbaric? Please remove.	The plan establishes a balanced combination of land available for both public and private purposes through the identification of primary uses of state lands and waters. This plan establishes policy for the ADNRR to direct principles of multiple use and sustained yield on all public domain lands. Specific projects are adjudicated through a separate process.	None.
Environment - General	Failure to designate areas for special use and protection. No New Special Use Area Designations Although most of the existing 1.2 million acres of state land in the basin remains in its original setting as undeveloped wildlife habitat, the addition of much more settlement will absolutely adversely impact these wildlife and existing subsistence use of them. Key moose and caribou rutting, over wintering habitat, movement and migration corridors need to be identified as special use areas. Also, brown and black bear denning areas (I.e. Alphabet Hills) need more protection.	There is no need to establish Special Use Areas to recognize important habitat areas. Special Use Areas are established to alter Generally Allowed Uses regulations.	None
Environment - General	3-23 management for Northern region- emphasis on mining. This should not be the case as it is the headwaters for the entire watershed. Mineral exploration is known to be bad for watersheds. The first priority is minerals, and second was listed as wildlife habitat... these are mutually exclusive.	This is a regional summary of the uses and resources, and no priority is given to any one use.	None
Forestry	I would like to request that the State consider co-designating area W-16 as Forestry. Chapter 2 page 2-24 states "Forestry designated lands are to be managed by ADNRR as a 'working forest' consistent with the constitutional mandate to encourage the use and development of state's resources, including renewable resources". It is important to keep the forest a working and renewable forest, while supporting the economic growth of the community and providing locally sourced wood products. In favor of commercial logging, forest management, & local employment. W16 should be co-designated forestry.	Concur in part. Unit W-16 will be broken into smaller units, some will be designated or co-designated forestry.	This unit has been broken into smaller units containing Wildlife Habitat, Public Recreation Dispersed, and Forestry designations.

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Forestry	Commercial logging on State lands in Wrangell-St. Elias NP/P should be managed to protect the McCarthy Road corridor view shed and avoid being visible from the road corridor. This includes the effects of clearing, logging, and brush/slash burn piles. Appropriate and timely controls/measures should be applied utilized. This should also include Best Management Practices of invasive plants and reclamation of logging trails which precludes opening the logged area to future ORV use.	The plan provides general guidance. More details are provided in timber sale decisions.	None
Forestry	More forestry resources need to be designated for local residents to harvest firewood.	11 AAC 96.020 Generally Allowed Uses allows for using dead and down wood for a cooking and warming fire, unless the department has closed the area to fires during the fire season. In addition, home firewood cutting permits can be obtained through DOF.	None
Forestry	Another consideration of forestry use in unit W-16 is that the building of logging roads, and reduction of fuels from the select removal of trees (all timber sales to this point have been thinning's, not clear cuts) can be a vital tool in fire suppression efforts in the event of a forest fire. As it currently stands, there is mostly private land between unit W-16 and the town of McCarthy. If a fire were to occur, it may be difficult to suppress it due to the abundance of private property in that section.	Noted. This comment should be submitted to DOF should they offer a timber sale in this unit.	None
General	Does the revised plan recommend any Special Use Areas/LDA's	The plan recommends expanding the Tangle Lakes Archaeological District (TLAD) Special Use Area - ADL 228296. Unit H-8 is adjacent to the only portion of TLAD in the planning area and should include in TLAD. The planning team is also recommending expanding the Thompson Pass Special Use Area (TPSUA) ADL 226446 to areas adjacent to the TPSUA.	None

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General	Dissatisfied with the planning process. Doesn't feel the community was consulted and included in the planning process.	DMLW has followed or exceeded AS 38.05.945 public meeting notice requirements. Thus far 13 in-person public comment meetings and 2 virtual public sessions have been held. The public review draft comment period was open for 90 days. There were a diversity of stakeholders at these meetings.	None
General	Management Area H, the highway corridors in the plan, should have a step-down plan completed. This planning effort needs local people on the planning team. The density of use, potential conflicts, mixed land ownership including many small land units, and lack of local government all combine to make this area a very complex planning area.	This is an area plan that provides general guidance for state owned lands and not specifically for highway planning.	None
General	AK DOT is currently working on an updated plan for highway corridors. They are working on a plan update for highway corridors. What efforts have been made to coordinate these plans?	ADOT&PF was included in the scoping meetings and agency review process for this revision. DOTPF was represented on the planning team and reviewed this document.	None
General	Recommend the development of a McCarthy Road Corridor AKDOT Material Site Plan to meet current and anticipated needs between Lakina and Kennicott Rivers for State lands. Develop plan in conjunction with UA & Wrangell-St. Elias NP/P. Any proposed development should be situated outside the road-corridor view shed, and when feasible on private lands. Material site/sand and gravel development and extraction on State lands within Wrangell-St. Elias NP/P should avoid cultural and historical resources and have reclamation plans.	Management direction for all authorizations on state lands is to avoid and protect historic and cultural resources. Further direction pertaining to siting and reclamation/rehabilitation for material sites are set forth in Chapter 2. A specific material site plan is beyond the scope of this plan.	None
General	Suggestion for Old Richardson Highway pullout between H102-103.	This plan does not go into this level of detail. DOTPF is the agency responsible for initiating plans for this type of project.	None.
General	Concerns related to conflicts between nonmotorized and motorized users in Thompson Pass SUA as well as frustration with permit holders not adhering to the terms of their agreement.	This will be addressed during a subsequent regulation process.	None

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General	Decisions made in the plan need to identify who/what is implementing the decision, and time frame for completion.	The plan will be used by adjudicators in guiding the decision making. Implementation is intended to occur throughout the planning window.	None.
General	Disagree with land swap between SOA and Chugach Alaska Corporation (CAC).	This plan does not recommend a land exchange with CAC.	None.
General	Master Record lists DOT&PF as the airport owner of record for McCarthy, Chisana and May Creek.	Concur.	Update to indicate these airports are under DOTPF ownership.
General	No objection to Page 3-74 H-34 indicates the intent to dispose of land to three active preference right applications, ADL 226385, ADL 226889, and ADL 226400.	Noted.	None.
General	We support H-4 being managed for dispersed recreation and fish and wildlife resources and habitats.	Noted.	None.
General	I am very pleased to see the multiple H-5 for material sites. An additional 5 of these would be a welcome addition, especially if they were ~40 acres in size near trails or access points to lakes and rivers.	Noted.	None.
General	Where can I find the parameters of the Thompson Pass Special Use Area Designation ADL 226446?	You can find it on our web site at: https://dnr.alaska.gov/mlw/lands/special-use-areas/	None.
General	3-122, 6. The residential development at 46 mile has been left out.	Noted.	None.
General	3-134. The anadromous Lowe River is a hot spot for ice climbing, mixed climbing, ice skating, kite skiing, kayaking, rafting and fishing. Please amend its “No High Value” status. Its value is enormous even to tourists and locals who are incessantly stopping to be wowed by Bridal Veil and Horsetail Falls. It is a gem of limitless value.	Remove High Value column from table 3-19.	Update table.

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General	I oppose a state vehicle bridge being built across Kennicott River, or McCarthy Creek. Limiting the bridge to foot traffic and ORV's allows for a more pedestrian friendly space for visitors and locals alike and creates business opportunities on the west side of the river. The limited access across the rivers has helped create a community of individuals who are independent, innovative, and resourceful. I support limited state subdivisions that are created with the intent to provide space for people who want to actually live here, not the growing trend of super wealthy 1 week a year vacation homes.	This Plan provides general management intent for state lands, the Plan does not make decisions about specific land-use authorizations.	None.
General	I have since heard from several folks that were at your public meeting a sincere appreciation for you taking the time to meet in person and discuss the plan. I encourage you to have one or more public meetings with the next draft to best receive public input.	Noted and thank you.	None
General - Boundary	The CRBAP includes the Matanuska-Susitna Borough and states on p1-11 that these lands are to be managed by that Borough. Why was this area even included in the CRBAP? The CRBAP includes the Matanuska-Susitna Borough and states on p1-11 that these lands are to be managed by that Borough. Why was this area even included in the CRBAP?	The planning area contains a mix of SOA and non-state owned lands. Units with mixed land ownership are identified in the resource allocation table in chapter 3.	None.
General - Boundary	Planning area should follow the old planning area boundaries, or a boundary change process should be undertaken.	The planning boundary is determined by multiple factors including geographic features and management continuity in area previously divided. Additionally, the state has acquired new lands since the 1986 plan that were previously in selection status and needed to be included in this update.	None

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General - Climate Change	Page 2-11, Lines 6 through 10: There is a complete omission that requires correcting: the effects of climate change on fish and wildlife and their habitats. Scientists are observing that as the climate warms, plant species move to higher altitudes and/or latitudes; they may change their times of leafing and flowering. In response, animals also move and/or adjust their habits if they are able to do so fast enough. North-facing slopes, which hold snow longer, are less prone to develop ice layers, and stay cooler throughout the year, can become important refugia. We urge that the first goal should include this sentence: "It is critical for the survival of our wildlife that climate change be considered before authorizing any development activities."	Concur in part. Will add climate change goals language.	Add climate change language to the Fish & Wildlife section of Ch. 2.
General - Cultural Resources	Preserving cultural resources is of utmost importance, and it is disappointing that the plan relies solely on state records to identify cultural heritage sites, neglecting the opportunity for collaboration with local villages, regional corporations, and other non-governmental organizations to ensure their protection. I urge you to rectify this oversight and prioritize the inclusion of local knowledge and collaborative efforts in identifying and protecting these invaluable cultural resources. Additionally, I strongly advocate against the inclusion of any additional trail systems in the management plan. The ecological impact of such trails can be significant and detrimental to wildlife habitats.	The Office of History and Archaeology maintains the Alaska Heritage Resource Survey and collaborates with various organizations to update information. The plan provides generalized guidance for access and does not specifically advocate for a particular trail system.	None
General - Data Sources	They are using ADFG as a professional resource, but not sharing the data, only internally reviewed. If this is an area wide reviewed it should be publicly reviewed as well. This process is not transparent.	ADF&G provides input as subject matter experts on fish and game resources within the plan boundary using publicly available data.	None
General - Drones	Does the plan address the use of drones?	This plan does not specifically address the use of drones however, the plan provides guidance for authorizations where drones may be employed.	None
General - Energy	The plan needs to include designations for future renewable energy projects. Tiekel Hydroelectric Project, High wind resource map areas, Geothermal areas.	The plan designates based on the resources present within the planning area not specific projects.	None

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General - Land Exchange	Unit W-6. These four remote isolated State land parcels situated in the mountains near Russell Glacier and elsewhere should be exchanged or sold to the National Park Service.	This plan does not address potential land exchanges.	None.
General - Land management	Portions of the Highway Corridor Unit include multiple land parcels identified for disposal by different entities -for example, the University of Alaska and DNR. Who will do the coordination to minimize conflict on proposed adjacent sales?	While the plan calls out areas of mixed ownership within a unit it does not provide management intent for non-DNR managed lands. See chapter 1 for what the plan does and does not do. For authorizations on state land there is a separate public process where coordination and conflict are considered.	None
General - Management Intent	Multiple use without restrictions should be the default.	This plan establishes management intent for the ADNRR using the principles of multiple use and sustained yield on all public domain lands.	None
General - Material Sites	All material site development should have concurrent reclamation which includes removal and temporary stock piling of vegetation, and soils for use in reclamation.	Noted. Rehabilitation of the site shall follow the requirements of AS 27.19.020 and 11 AAC 97.250.	None
General - Mineral Orders	Mineral Order 1274 (Map C-1). Support keeping this Mineral Order in effect which closes these lands to mineral development.	Noted.	None
General - Mineral Orders	MO 1274 closes 336,976 acres to mineral entry and locations and is, in accordance with AS 38.05.300 for future land disposals. Mining activity in the project area would be incompatible with the current and proposed land estate uses. The land does not contain any known mineral deposits and was not selected for mineral values. Provide the research or study that shows these areas contain no known mineral deposits.	The decision to apply mineral location closures will be made by the Commissioner of ADNRR within the standards set by Alaska Statutes. AS 38.05.185(a) requires that the Commissioner determines that mining is incompatible with a significant surface use before an area can be closed to mining.	None.
General - Mineral Orders	Mineral Order 1274 which closes approximately 336,976 acres of state land classified Settlement or Agricultural Land to mineral entry. Does this mean previously earmarked lands Agricultural and Settlement have been re designated as mineral only?	Mineral closing orders close state lands (mineral estate) to mineral entry. Mineral orders do not designate land as mineral only.	None
General - Mining	The subsurface estate on all State lands within Wrangell-St. Elias NP/P should be withdrawn from mineral entry and mineral development/extraction except for Material Sites (MS) for sand and gravel and riprap.	By statute, all state lands are open to mineral location unless specifically closed.	None.

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General - Mining	The decision of whether to allow mining must be made with caution. It should be preceded by great care in permitting exploration, because once a company has invested money in exploring for and discovering an economic ore body, it becomes difficult for the state to deny permission to mine. The state must also consider whether it has the resources to monitor and enforce its regulations effectively.	All SOA lands are open to mineral entry unless specifically closed. This plan provides guidance for authorizing surface uses not mining itself.	None
General - Mining	Navigable Riverbed Corridors. Close these areas within Wrangell-St. Elias NP/P to mineral entry, mineral leasing, and mining.	By statute, all state lands are open to mineral location unless specifically closed. Where an area is open to mineral location, a miner has the right to stake a mining location regardless of the surface use designation or classification. Any adverse effects of mining on surface resources or uses will be managed through compliance with state laws and regulations and the management guidelines in this plan.	None
General - Planning	The plan sets broad levels of acceptable uses and highest and best use for units of land, but there are no on-the-ground actions discussed. As we know, the devil is in the details. Where and when do the on-the-ground decisions get made, and who implements them?	The CRBAP is intended to provide an overall management strategy for state lands and resources within the planning area, as well as specific management strategies for individual management units and is the expression of how ADNR will pursue this management. Adjudicators will use this plan when reviewing and making decisions on authorizations for use of state land, including permits, leases, sales, conveyances, and rights-of-way.	None
General - Recreation	Conduct studies of potential areas for closure to future commercial activities such as Heli skiing. Commercial operations in high use areas should be managed through a limited entry with fees to support monitoring and management commercial activities.	Studies for this purpose are beyond the scope of this plan. Closures must be made through a separate regulatory process.	None

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General - Recreation	Page 3-68 (H-8): The inlet creek to Swede Lake may also be anadromous; please check with Sport Fish in Glennallen. We strongly support the whole unit being conveyed to the state and included in the TLAD SUA. We strongly oppose its conveyance to the University of Alaska because UA's two mentioned development/monetization options strongly conflict with long-time established uses of public recreation and hunting. UA lists "1) Remote recreation (e.g., hunting and guide permits)" for an area that is already heavily used by Alaskan hunters and "2) "Subdivision and sale" which would close these areas to the general public.	Unit H-8 is in selected status but, if conveyed to the state, the plan recommends for TLAD expansion.	None
General - Regions	There are 6 designated regions on the map. The Copper River Census Area is ONE region, this map designates 6 different regions in the area. The REAA and the CRCA boundaries match, the DNR plan does not match. DNR states that "regions" are set up in watershed regions, what watershed is this transportation region? Designating regions leave the area open to future divisions of these areas into different regions. These are arbitrary lines that have nothing to do with anything. The Glenn Richardson Region is a transportation corridor not a region.	The planning area is separated into six individual management regions that occupy areas with similar characteristics and management direction. For these regions, the plan establishes goals, objectives, management guidelines, and land classifications with management intent that apply to all state lands within the planning area.	None
General - Resources	We rely on state resources for our livelihood. We have multiple DNR permits for such things as gravel extraction, bridge ROW, and cross-country travel. Our entire livelihood originates in the McCarthy area. McCarthy is surrounded by National Park & Preserve, which sometimes feels stifling to development. We are opposed to any State lands being designated as Tourism or any other status that inhibits resource use or development.	All classifications are multiple use in nature and do not inhibit development.	None.
General - Resources	When land is designated Settlement, can it still be used for hunting, gathering, firewood, recreational use until it is converted to an actual land sale? Or does Settlement mean it becomes off limits immediately?	All classifications are multiple use in nature. State land is available for generally allowed uses under 11 AAC 96.020 until sold into private ownership.	None

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General - Resources	Fire safety, local wood resource availability, and subsistence hunting and fishing effects—if passed, our "one" local lumber company would be limited in being able to provide us the various products they produce due to the loss of opportunity to select harvest in those areas. We would also lose the opportunity to get a permit to harvest dead growth in these areas. Leaving the dead growth standing creates a serious fire hazard in a community protected by a small volunteer fire department.	This plan does not affect generally allowed uses of state land.	None
General - Resources	Page 2-34 Lines 15-16 states precious metals are found throughout, but again no mention of specific areas. These minerals do not actually occur throughout the planning area, they are areas within the plan area where such resources have been discovered. The plan should identify specific areas where mineralization is known or likely to occur.	Precious metals are found throughout the planning area. It is not the purpose of this plan to provide specific deposit locations.	None.
General - RS2477	The plan acknowledges RS 2477 trails in several units, but RS2477 trails don't exist unless the states claims them and actually maintain them. This is a plea for the state to start maintaining all its claimed RS2477 trails. They are all unusable without maintenance, and the state will never be able to perfect their right to them. Without maintaining them.	Noted. The plan acknowledges RS 2477 trails with the recognition that these trails may be difficult to locate or use.	None
General - Services	One ongoing struggle locals have to deal with is waste management. With no municipal government in the area, there is no city planning in place to accommodate increased settlement on the scale suggested in W-16. The nearest location for waste disposal is a privately owned landfill site located 122 miles away and is more than a 3-hour drive. Lack of waste management accessibility threatens habitat and water quality that support an important subsistence lifestyle in the region.	The planning of services such as waste management is beyond the scope of an area plan. However, Unit W-16 will be broken into smaller units. Designation will include Settlement, Forestry, Public Recreation, Habitat.	Yes

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General - Transportation	Transportation goals outlined in the plan should incorporate a section specifically addressing the replacement of culverts to promote adequate water and fish passage. Additionally, it is essential to reference research on permafrost stability and seismic activity to ensure the infrastructure's resilience and minimize potential environmental impacts.	Replacement of culverts is project specific, and this level of detail is beyond the scope of this plan. General provisions for fish passage are provided in chapter 2.	None
General - Trespass	Thompson Pass is a popular world-class recreation area and use will likely continue to increase in the future. CRBAP recommendations emphasize expanding recreation opportunities including commercial recreation. CAC is concerned about potential trespass issues that could affect corporate lands and requests an opportunity to comment on any proposed state permit applications.	Noted. 11 AAC 96.020 Generally Allowed Uses specifies rules for travel across state-owned lands. The SOA cannot control access from state-owned lands onto private lands. Permitting is a separate administrative process from this plan.	None.
Habitat	3-82 & 3-122, 16. Trumpeter swans are not limited to the “northernmost portion of the unit”. They are in multiple locations including but not limited to Blueberry Lake, a small unnamed lake on the hairpin parcel and the ponds at about 161/2 mile.	Noted. Trumpeter Swan Distribution information is based on ADF&G data.	None.
Habitat	Consultation with ADF&G, especially with local biologists, is key to protecting fish and wildlife resources. We recommend that H-4 lands be closed to new mineral entry.	Concur in part. Multiple mineral closing order close portions of unit H-4.	None.
Habitat	3-122, 14. Moose rutting habitat occurs in multiple other areas including the flats before Keystone Canyon.	Concur. Plan language updated.	Update table.
Habitat	Please protect the heritage and wildlife habitat resources in the Denali Highway - TLAD area. The Nelchina caribou herd, moose, fox, wolves, ground squirrels, waterfowl, ptarmigan depend upon this area for its high habitat values.	Concur. Management intent for unit H-7 states - Unit is to be managed for the protection of the heritage resources consistent with the requirements of ADL 228296 and 11 AAC 96.014(b)(24) for the Tangle Lakes Archaeological District Special Use Area. Retain in state ownership. Unit H-8 is in selected status but, if conveyed to the SOA the plan recommends for TLAD expansion.	None.

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Habitat	Develop measures to enhance wildlife viewing and provide more protection for Long Lake salmon fisheries and do not consider additional settlement along the Long Lake shoreline (especially south facing slopes and nearby undeveloped uplands) or within the Long Lake watershed. Recommend establishing a Wildlife Protection Area with ADF&G that prohibits bear hunting and new settlement on State lands surrounding Long Lake.	Unit W-16 has been broken into smaller units containing Habitat, Public Recreation, and Forestry designations. Management, maintenance, and protection of fish and wildlife resources are the responsibility of the Alaska Department of Fish and Game. Allocation of fish and game stocks and regulation of harvest methods, means, and timing are the responsibility of the state board of Fisheries and Game.	Re-evaluate resources in this area of W-16. Unit W-16 has been broken into smaller units containing Habitat, Public Recreation, and Forestry designations.
Habitat	Critical Wildlife habitat should be closed to mineral development.	By statute, all state lands are open to mineral location unless specifically closed. Habitat closures cannot exceed 640 acres without legislative approval.	None
Habitat	No recreational use designations in ANY Caribou Calving grounds or Moose Wintering. Coordinate with the plan that is being produced by local organizations in the copper valley.	This plan seeks to provide opportunities to maximize the use of state lands consistent with our multiple purpose use mandate. The designations reflect the resources and uses present.	None
Habitat	Establish a Tangle Lakes State Game Refuge Area for protection of critical Caribou and wildlife habitat and that the area be managed by ADF&G. This refuge would prioritize and protect the wildlife habitat and control the use of ORVs.	This plan does not make recommendations for a new game refuge. The use of ORV's is not managed by ADF&G and a game refuge would not necessarily limit this use. Motorized vehicles area restricted in the Tangle Lakes Archaeological District SUA under 11 AAC 96.014(24).	None
Habitat, Water protection	Protect fish and wildlife habitat and drinking water. Specifically in the Kenny Lake, Copper Center, and McCarthy areas against further Settlement & Agricultural development. Protect Kenny Lake's community water wells.	See chapter 2 management guidelines for Settlement and Agricultural development. The state will provide, in its design of land disposals, an open-space system to preserve important fish and wildlife habitats and natural areas such as shorelands, freshwater wetlands, and riparian lands.	None.

Subject	Issue Summary	Response	Recommended Revision
Habitat/Recreation	The Denali Highway region is valued by a great number and variety of Alaskans. It was used by the AHTNA people for hunting, fishing, berry-picking, and even marriage ceremonies between people from the eastern and western sides. Hunting, fishing, and berry-picking continue to be important annual activities there for Alaskans from Fairbanks, the Copper Basin, the Mat-Su, and Anchorage. Its open terrain is favored by hikers, while it also provides scenic views for tourists and Alaskans driving through.	Concur.	None
Invasive plant species	Take measures to prevent and control the spread of invasive plant species.	Overall management goals in plan are to avoid the introduction and reduce the spread of invasive plants. Specific measures to prevent the spread of invasive species are set out during the adjudication process for material site authorizations.	None
Land Sales	Concerns about the amount of Settlement lands being designated. The new land developments, access and the quality of the land where developments are proposed.	By Statute we are required to identify areas for Settlement in the plan. This plan identifies a variety of areas for settlement projects.	Some areas designated as Settlement in the Public Review Draft were reassessed and redesignated.
Land Sales	The 1986 plan 3-57 (mgmt. unit 8) states Tazlina Lake “Settlement, through land offerings or remote cabin permits, is not allowed in this management unit.” What changed? Most of the land at the northern end of Tazlina Lake (unit C1) is wet, swampy, and unsuitable for settlement. Tazlina Lake is my clan's ancestral home, most of whom now are Tribal Members of Tazlina Village, the Village was never contacted about this plan. Designating this area as Settlement will only benefit those who can afford to build remote structures. The Lake Louise area is littered with abandoned structures and litter. Opening this area to Settlement will produce the same results. Development in this area will also destroy the salmon habitat we depend on for subsistence harvest.	This plan identifies area for potential settlement but how settlement projects are developed and potentially offered is handled through a separate decision process. Disposal decisions require public notice.	None.

Subject	Issue Summary	Response	Recommended Revision
Land Sales	Where can I find land sale information	DNR's main web site has information about current land sale opportunities and programs.	None
Land Sales	There is demand for land sale parcels with desirable views, lake and riverfront, good access, and amenities. Demand for remote parcels has not been high over the years and is costly to develop.	Concur.	None.
Land Sales	There is a proposed state land conveyance, aka "Copper River Wilderness Subdivision" that has access issues, represented in blocks H-42 or H-43.	Noted.	None.
Land Sales	Opening so much Settlement land in the CRBAP area will flood the land sale market and drive down prices for private sellers	The plan identifies lands that are suitable for settlement, but the amount of land and siting of potential projects is addressed by a separate and subsequent public process.	None.
Land Sales	CAC is concerned about potential trespass and management issues that could occur with additional land disposals on adjacent state lands. There may be opportunities to mitigate potential trespass and management issues on CAC lands prior to disposing of state lands. Please advise CAC of any potential land disposals so we may review potential subdivisions and offer input prior to disposal.	The public affected stakeholders in the area would be notified per AS 38.05.945	None.
Land Sales	No State of Alaska settlement lands should be considered or promoted within units M1, M2, and M3	Units M1, M2, and M3 are not considered for settlement in the plan and are designated Resource Management, Wildlife Habitat, and Public Recreation Dispersed respectively.	None.
Land Sales	O-10 Settlement should be closed for Remote Settlement. According to ADFG Glennallen, in recent years due to difficult winters, the Nelchina Caribou herd has gone from 35,000 to 17,000. The herd is struggling with the consequences of climate change and increased human activity. Caribou calving and winter use habitat are present throughout this unit, with rutting areas present in the southern half of O-10 Settlement.	The management intent for this unit already provides considerations for caribou and how potential settlement areas should be designed to address habitat concerns.	None.

Subject	Issue Summary	Response	Recommended Revision
Land Sales	Any future State land disposal proposals should be restricted to lands outside the external boundaries of established federal conservation areas and other high use recreational corridors within or proximal to federal lands.	State land within federal conservation system units needs to be managed for maximum use consistent with the principle of sustained yield.	None.
Land Sales	Supports opening additional Settlement lands including RRCS in the McCarthy area. Additional settlement opportunities would bring hardworking people and additional diversity to our community that could lead to additional work opportunities and services.	Concur, the plan provides more settlement opportunities in the McCarthy area.	None.
Land Sales	Before identifying, delineating, subdividing and/or establishing a settlement area, that proposed subdivision plan should consider wildlife travel corridors and essential habitat, wetlands, protecting natural undeveloped landscapes and be available for public comment.	Habitat values are considered when designating areas for settlement. Subdivision design and development is done in a subsequent and separate public process.	None
Land Sales	Proposed settlements being located near wetlands and riparian habitats, which are ecologically sensitive areas. These locations possess unsuitable soil for development or construction purposes, raising concerns about the potential degradation of these fragile ecosystems. Similarly, the economic development goals outlined in the plan should consider the feasibility of development and settlement disposals, particularly in remote access areas. It is crucial to ensure that such development serves the interests of local communities and supports the workforce in the region.	Chapter 2 provides guidance for the protection of these areas. Subdivision design and development is done in a subsequent and separate public process that considers these resources.	None
Land Sales	2-21 the plan talks about protection of Riverine area, yet the majority of the land released to disposal are around or along waterways.	See chapter 2's Shorelands and Stream Corridor section and the Settlement section for riparian protection guidance.	None

Subject	Issue Summary	Response	Recommended Revision
Land Sales	I wish to remind DNR that when developing land for any reason to please include with all property designs utility rights-of-way and easements. Rights-of-way and easements are essential for having utilities to any property. Utility service to any property generally makes the property more attractive and of greater value to the property user. Also consider wireless cellular tower locations and wireless service to the immediate area of property being considered for development by the Dept. of Natural Resources.	Noted.	None
Land Sales	Recreational cabin and recreational lands are far different than Settlement. We need settlement for our children's housing, for growth, for permanent residents not weekend warriors. Our immediate needs are to get Settlements near infrastructure with roads so they can drive to work daily. The problem is remote cabins are REMOTE and not feasible for our needs of housing for full time residents.	This plan provides guidance for a variety of different settlement projects. If settlement areas are offered in the future, there is a separate public process where this type of comment would be useful.	None
Land Sales	Delineate wetland areas and prepare wetland maps. Prohibit building of new structures and roads within delineated wetland areas.	This is handled through a subsequent decision process for a land sale project.	None
Maps	Show Thompson Pass Special Use Area boundary on applicable plan maps.	Concur.	Update applicable maps to show TPSUA boundary.
Maps	Diagrams/Maps – areas are not easy to read or identify locations with no tangible reference point to orient yourself. Maps should have landmarks including mile markers, roads, water bodies and satellite image background so when looking at the individual maps you can orient what you're looking at.	Noted.	Update maps to include reference points that are appropriate. Lakes, Mountains, Roads, etc.

Subject	Issue Summary	Response	Recommended Revision
Maps	The discussion in the plan regarding planning & management of the Lake Louise area was particularly confusing. It would be helpful to include a map in the plan which shows what lands will continue to be under the jurisdiction of the Mat-Su borough and which lands are included within the CRBA planning area. Access for the general public is not adequate in the Lake Louise area. Take your kayak or skiff out on the lakes and look for a place to pull out along the shoreline for lunch? What about a remote camping area for those who want to camp overnight? Definitely not enough public access along lake shorelines. If the plan can include some public recreation land along the Lake Louise shoreline, please do so.	Map 3-3.2 shows the breakdown of land ownership in the Lake Louise area. A public access easement under AS 38.05.127 has been established to and along Lake Louise. Administrative code 11 AAC 96.020 outlines uses that are Generally Allowed on state owned land including overnight camping.	None
Plan Book Corrections	Technical corrections	Concur.	Correct typos and technical errors.
Plan correction	The McCarthy Creek Airstrip parcel is inaccurately depicted as State land on this map. Ownership of this airstrip is very much in question by multiple parties. This airstrip was not transferred into State ownership, as some other airport properties were, with the passage of the May 7th, 1959, Alaska Omnibus Bill. I'm requesting that this parcel be removed from the CRBAP planning process and removed from all DNR maps inaccurately depicting it as State land.	Concur.	Update as suggested.
Plan correction	Page 2-34 - Lines 18-19 refers to placer gold being found as inclusions in rocks and within rock veins, this is incorrect – if gold is “found as inclusions in rocks and within rock veins” it would be lode, not a placer deposit.	Concur.	Update language as suggested
Plan correction	Lines 20-21, reads “Ultramafic metamorphic rocks are the result of alterations to a rocks composition or structure due to immense heat, pressure, and other volcanic activity”. Actually, there are many magmatic ultramafic rocks and those in particular have high PGE and Cr potential. These are just a few of the statements on pages 2-34 and 2-35 indicating this section was not reviewed by DGGS or a geologist. This section needs to be revised.	Concur.	Update as suggested.

Subject	Issue Summary	Response	Recommended Revision
Plan Feedback	It would improve the plan to expand the sections on What the Plan Will and Will Not Do and How it will be coordinated with other plans.	Ch1 pages 1 -10 through 1 - 12 provides a detailed explanation of what the plan does and does not do.	None
Plan Feedback	The plan revision does not include local or regional plans like the Comprehensive Economic Development Strategy (CEDs) by CVDA 2003 (Currently being updated).	The CRBAP is intended to provide an overall management strategy for state lands and resources within the planning area, as well as specific management strategies for individual management units and is the expression of how ADNR will pursue this management. Local and regional plans were reviewed in the development of the state plan.	None
Plan Feedback	I began to read the plan and got through the introduction. It was incredibly cumbersome and not clear as to what the actual intent of the plan curtails. I found multiple redundancies and complex topics that were not relevant to the topic at hand. I understand that the State needs to be detailed and comprehensive in order to provide definitive guidelines for classification and management of lands, but it doesn't need to be inefficient in that approach. Just project the points of the plan somewhere in the initial document without the inundation of unnecessary information such as climate zones and foliage. I am sure this would be cost effective and encourage more public participation.	Chapter 1 explains what the plan does and does not do.	None
Plan Feedback	The plan incorporates federal and private land into the CRBAP when the state has no authority to manage these lands, leading to a misrepresentation of the amount of land designated as wildlife habitat.	While we depict the variety of land ownership within planning area, the plan, in multiple locations, states that it only applies to state land. See chapters 1 and 4 specifically.	None

Subject	Issue Summary	Response	Recommended Revision
Plan Feedback	The “H” section of the plan is the part of the entire area which has, and will continue to have, the most potential for management conflicts. The scale of the highway corridors, when being planned in the context of the adjoining acreage which is given a broad-brush approach, makes this very difficult. It may be beneficial to split out the highway corridors from the adjoining 5 million acres and make the highway corridors a separate area plan with more detail? Or eliminate the “H” section, and instead add those lands in the highway units into the adjoining land unit.	The planning area is separated into six individual management regions that occupy areas with similar characteristics and management direction. This plan already recognizes the significance of the highway corridors in making it a separate region with its own management guidelines.	None
Plan Feedback	Page 2-34 - Lines 15-16 refers to “sands lining the Copper River’s mouth” – we believe the statement may have intended to apply to the Copper River Basin, not the river’s mouth as the Copper River’s mouth lies well south of the planning area.	Concur. Plan language references an area that is outside the plan boundary.	Update plan language to clarify the section is referring to the Copper River Basin and not the river's mouth.
Plan Feedback	Develop a Campground Recreational Plan for State lands proximal to the road system in the Copper River Basin. Maintain all existing and develop new campgrounds along the road system. Numerous travelers camp overnight in pullouts without adequate facilities such as toilets. Campgrounds are an appropriate means to manage and control visitor’s use.	A detailed recreational plan is beyond the scope of this area plan however, this plan did identify certain areas to be retained for this use.	None
Plan Feedback	ANCSA 17b. Recommend that the State of Alaska work closely with Federal agencies and Native Corporations to ensure that all reserved ANCSA easements are situated along a practical and maintainable location alignment.	Concur.	None
Plan Feedback	Order of Fish and wildlife habitat and harvest goals... priority of uses needs to change. Says Commercial, recreational, and then traditional uses... Needs to change to list Subsistence resources first followed by commercial and recreational uses. As16.05.258 subsistence use and allocation make subsistence a priority. AS 16.05.094	The list is not in any priority order.	None

Subject	Issue Summary	Response	Recommended Revision
Plan Feedback	Why doesn't the CRBAP boundary match the Copper River Census Area boundaries (CRCA)? In fact, the CRBAP includes the Matanuska-Susitna Borough and states on p1-11 that these lands are to be managed by that Borough. Why was this area even included in the CRBAP? The CRBAP also includes areas south of the Richardson from mile 40 to Valdez that are also outside of the CRCA these are in the Chugach REAA. I would strongly request that the boundaries of the CRBAP match the CRCA.	Plan boundaries generally follow drainage basins and have nothing to do with census areas or borough boundaries.	None
Plan Feedback	Loss of Copper River Regional Area Lands!! Why are you taking away land from our region and giving it to Valdez-Cordova? More Revenue to Valdez perhaps?	Plan boundaries generally follow drainage basins and provide guidance and management intent for state lands. Changing a plan boundary does not direct revenue from one region to another or change land ownership.	None
Plan Feedback	Existing Management vs Proposed Management: for each of the planning units within the plan area, it would be much more understandable if you could describe the existing management approach along with the proposed new management approach, as well as the rationale for the change in strategy.	The 1986 plan is available online and can be compared with the revised plan.	None
Technical Corrections	Discrepancies in acreage numbers need to be verified.	Verify that the acreage listed in each region acreage table balances with the grand total shown in chapter 4.	Verify that the acreage listed in each region acreage table balances with the grand total shown in chapter 4.
Plan Language	Keep most of the language from the 1986 plan.	Alaska Statute (AS 38.04.065) requires the Commissioner of the Department of Natural Resources (ADNR) to "adopt, maintain, and when appropriate, revise regional land use plans that provide for the use and management of state-owned land." The ADNR has developed the CRBAP to ensure that all state land and water within the planning area are properly managed.	None.

Subject	Issue Summary	Response	Recommended Revision
Plan Language	In H-1, the generalized language for all segments of the transportation corridor is a poor fit for the Denali Highway, which receives, for instance, nowhere near the traffic of the Richardson and Glenn Highways. There is no need for the highway to have more than preventive maintenance, no need for side roads. This segment of the highway already has a very good wayside with toilets that the state should continue to maintain. We ask that a paragraph be inserted that states this, and that gives stronger protection to wildlife and, especially with regard to the Gulkana River, fish. All state lands along the Denali Highway should be retained in state ownership, and all state-selected land should be transferred to state ownership.	The management intent for H1 already states that land should be retained in state ownership and impacts to fish and wildlife habitat should be minimized. Decisions related to development shall consider potential impacts on the habitat values and include stipulations/ conditions/measures that will avoid, minimize, or mitigate potential negative effects. All uses should also consider potential impacts on migratory waterfowl and promote protection of riparian areas and water quality. Adjudicators are directed to consult with ADF&G regarding authorizations that may impact wildlife and habitat.	None
Plan Language	The plan needs to include designations for planned utility and transportation corridors. Glennallen-Sutton Intertie.	Unit H-1 is co-designated Transportation Corridor and Materials. The transportation corridor designation applies to land identified for the location of easements and rights-of-way under AS 38.04.065(f), including transportation, pipeline, or utility corridors or is under consideration for a right-of-way lease. This designation reflects the need for efficient inter-regional infrastructure, the need for intra-regional access to resources on state and non-state land, and consideration of the impacts of increased access on resource uses. The intent is to provide a reserve of state land for the eventual development of easements and rights-of-way, including transportation, pipeline, or utility corridors or other linear transportation projects.	None
Plan Language	Page 2-42 Lines 20-22. We appreciate the general concept behind this goal, but added to this list should be natural sounds and natural quiet. And there are many places, not just a very few, where protecting those resources is appropriate.	This goal intends to preserve the natural character of the land.	None

Subject	Issue Summary	Response	Recommended Revision
Plan Language	I suggest additional information be included in the plan that details how reservations of water under AS 46.15.145 can be acquired and used along with other AS 46.15 appropriation of water uses to manage Alaska's water resources in the best public interest under AS 46.15.080.	Ch2 page 2 - 45 provides information about instream water reservations.	None
Plan Language	The Ma - Materials - classification mandates lands remain in state ownership until the material is no longer required for state purposes. This classification needs to have an added provision taking into account the importance of maintaining sand and gravel availability to the general public, not just the state.	Land classified as Materials is to be retained in SOA ownership and made available for private and public use. All materials owned by the SOA made sold or conveyed as provided in AS 38.05.550-565, AS 38.05.810, AS 38.05.872.	None
Plan Language	Page 2-42, Lines 11-13. What recreation opportunities serve habitat protection, timber management, and mineral resources? We don't understand this goal.	Concur.	Revise language to clarify that the recreational opportunities occur on land that is used for multiple purposes.
Plan Language	Page 2-42 Lines 16-19. This seems to favor "encouraging commercial development of recreational facilities and services" over avoiding "environmental impacts and conflicts with the existing users of an area." We suggest deleting "minimizing" and instead saying: "Encouraging commercial development...when significant environmental impacts and significant conflicts with the existing users of an area can be avoided."	Concur in part.	Revise language to clarify that environmental impacts and user conflicts are addressed separately in a different section of the goal.
Plan Language	Page 2-42 Lines 26-27. Another excellent goal. Page 2-39, lines 11-12. We of course support avoiding "long-term detrimental impact on natural resources.". Pages 2-39-40. Joint Use and Consolidation of Surface Access. This is only common sense and is very important. We support the plan's decision to keep most state lands open to mineral entry.	Concur.	None

Subject	Issue Summary	Response	Recommended Revision
Plan Language	Page 2-43. Lines 21-25. We appreciate the effort here to protect natural values and existing uses. All too often, however, DNR has interpreted “least conflict” and “significant adverse impacts” quite loosely, in favor of commercial projects and to the detriment of natural values and existing uses.	Adjudicators must consider the management guidelines which are specific directives that apply to management decisions.	None
Plan Language	Concerns about plan book language and accuracy of describing minerals, locations and other mining activities. Multiple references to specific page entries. Ex: 2-34 and 2-35 are overly simplistic, geologically inaccurate and confusing. 2-34 lines 15-16 states precious metals are found throughout, but again no mention of specific areas. Page 2-34 - Lines 18-19 inaccurate definition of placer mining. Lines 20-21 concern about the description of Ultramafic metamorphic rocks. We recommend DNR have DGGS geologist review and revise this section’s language.	Concur in part.	The section will be revised to provide more relevant detail about the mineral resources in the area.
Plan Language	If I am reading document right, I concur with 374,000 acres of 551,501 in corridor unit being utilized for some form of recreation. Recreation on rivers and lakes occurs year-round, for snowmobiling, cross-country skiing, and snowshoeing, and this should be reflected in the plan.	Concur.	None
Plan Language	Page 2-35, lines 12-13: Please substitute, “Consider permitting the exploration and development of mineral resources where such activities will not displace long-standing pre-existing uses.”	This goal seeks to provide additional opportunities to maximize use of state lands consistent with our multiple purpose use mandate.	None
Plan Language	Page 2-42 addresses the Recreation & Scenic Resources Goal for Recreation Opportunities- the state states it will...”assist communities through cooperative planning, conveyance of state lands, and grants in-aid for parks and trails within population centers”...just how does this process work in an unorganized borough with no local government? Additional parks and trails would be good for our area, for enhancing and expanding local tourism opportunities, as well as places for local people to enjoy and would help expand a sense of community.	The plan provides guidance for adjudicators issuing authorizations and does not initiate projects.	Revise language to clarify this plan does not initiate projects.

Subject	Issue Summary	Response	Recommended Revision
Plan Language	Keep language within the plan allowing for land trades between Fed gov and State.	Noted.	None
Plan Language	Page 2-17 Species specific management guidelines, many species are listed but there was no listing for Salmon. This should be added.	Concur.	Add a Salmon section to Ch 2.
Plan Language	I've heard a long-standing statistic that 20% of the Copper River red salmon fishery spawns in Long Lake, which alone should deserve the highest level of protection. The lake is also unusual because springs along the northern shoreline keep the lake open and ice free well into the early winter, which allows a concentration of grizzly bears to feast on late fall salmon carcasses. These habitat values are essential to protect. Furthermore, from a safety standpoint, it makes no sense to intentionally drop residential development into this mix of salmon and bears. Plus, the steep slopes are highly unsuitable and problematic for development. This area earns a hard "no" to land disposal of any kind.	Concur in part.	Revise table to add Long Lake to the listing of anadromous waters in the plan and will be designated wildlife habitat and public recreation.
Plan Language	2-47. The first goal listed for purposed settlements was to provide for seasonal and recreational purposes. This should change to include year-round and community expansion to be the first priority. Our economic development is not just what the state decides.	The goals are not listed in priority order.	None
Plan Language	Page 2-35, lines 15-20: Please insert, instead of "Economic Opportunities": Management: Manage state lands for efficient and environmentally sound practices, throughout the process, from exploration through development, tailings disposal, reclamation, and any necessary long-term treatment. Ensure that the state has sufficient manpower and financial resources to effectively monitor and enforce its regulations and stipulations. Ensure that exploration and development companies have sufficient bonding to pay for reclamation, any long-term treatment, and cleanup of any spills.	These suggested edits are inappropriate and beyond the scope of the plan.	None

Subject	Issue Summary	Response	Recommended Revision
Plan Language	Page 2-35, lines 23-24: Please substitute, "...protect wildlife, the integrity of the environment, public uses, and affected cultural features to the greatest extent possible. Local offices of Alaska Department of Fish and Game and traditional Native villages will be consulted on these issues."	Consultation language is included by geographic area in chapter 3. Chapter 2 provides generalized language by resource.	None
Plan Language	Page 2-11, Lines 9 & 10: Please delete "of regional, state, or national significance." As scientist Aldo Leopold famously wrote, "To keep every cog and wheel is the first precaution of intelligent tinkering." All of our native species play roles in ecosystems, and we are ignorant of what many of these roles are.	Under AS 38.04 and 11 AAC 55, the state is required to provide management guidelines that recognize the importance of these resources.	None
Plan Language	Page 2-11, Line 40: Please conclude the sentence with "when suitable, the continuation of other uses of the area." Under this plan, designated Habitat areas would comprise only 11% of the total. We can afford to let fish and wildlife have that much.	Classifications identify the primary use for which land will be managed subject to multiple use. Management guidelines are intended to maximize the use of state lands consistent with our multiple purpose use mandate.	None
Plan Language	Page 2-12, Lines 3 & 4: Please omit "The cost of mitigation relative to the benefits to be gained will be considered in the implementation of this policy." The language is vague, and raises the question of "whose cost and whose benefit?"	When considering various mitigation measures, adjudicators need to balance the cost versus the benefit.	None
Plan Language	Page 2-12, Lines 31-33: Please insert "or require" after "consider."	This requirement is already captured on page 2-12 lines 34-36.	None
Plan Language	Page 2-12, Lines 34-36: Please delete this sentence. The definition of "in the best interest of the state" changes from one administration to the next.	The best interest of the state is the statutory standard that must be used.	None
Plan Language	Page 2-13, Line 10: Please add "Bird migration corridors," both here and in the Glossary. The Mentasta Mountains, Nabesna Road, Copper River, and the Tahnta Pass area of the Glenn Highway are important raptor migration corridors. Over time, important songbird migration corridors will be identified. Structures such as cell phone towers and wind turbines should be sited to avoid these areas. Any lights should be required to be designed to minimize harm to migrating birds of all kinds.	The plan includes consultation language in chapter 3 by geographical area. When an authorization is considered, these consultation provisions would allow for more detailed stipulations to potentially be included as appropriate.	None

Subject	Issue Summary	Response	Recommended Revision
Plan Language	Page 2-13, Lines 34-37: Please omit “in the best interest of the state.” The definition of “in the best interest of the state” changes from one administration to the next.	The best interest of the state is the statutory standard that must be used.	None
Plan Language	Page 2-13, Line 39: Please add, “removal of surface material and/or underlying strata.”	This language is not intended to be an exhaustive list.	None
Plan Language	Page 2-14, Lines 14-16: Please omit this condition, for the same reason as that given for page 2-13, lines 34-37.	The best interest of the state is the statutory standard that must be used.	None
Plan Language	Page 2-19, Line 39, through Page 2-20, Line 20: These are important requirements for the protection of bird species, many of which (as noted above) are in serious decline. Climate change is likely to make this situation even worse.	Noted.	None
Plan Language	Page 2-21, Lines 24-26: Please add a statement like this: “Adjudicators must consider whether removing a non-renewable resource such as minerals and materials is worth disturbing or destroying otherwise renewable resources such as plants and animals.	Under AS 38.04, the state is required to consider both renewable and non-renewable resources to provide for maximum use of state land consistent with the public interest.	None
Plan Language	Page 2-23, Lines 12 and 13: What is deemed “of sufficient public importance” varies from one administration to the next. Fish and wildlife are sustainable resources of public importance; they and their designated harvest areas must be respected. Please delete these two lines.	This section of the plan recognizes that certain authorizations may be needed because they provide an overwhelming benefit but that does not remove all fish and wildlife protections.	None
Plan Language	Page 2-40, lines 27-32. The State should not sell state land unless access that minimizes environmental harm can be identified and can be designated as the legal access to the property.	Access is always required for state land sale projects. See the Settlement section in chapter 2 for additional access guidelines that address this issue.	None
Plan Language	Page 2-14, Line 44: Thank you for requiring the maintenance of in-stream flows for fish. Please add “and invertebrates,” which are important food items for both aquatic and terrestrial wildlife.	This section addresses fish habitat specifically.	None
Plan Language	Page 2-17, Lines 19-27: Thank you for stressing the importance of avoiding acoustical or visual disturbance to moose, and for applying the same requirements in your discussion of caribou and Dall’s sheep. Please apply the same to mountain goats.	Concur.	Change as indicated.

Subject	Issue Summary	Response	Recommended Revision
Plan Language	Clarify chapter 3 unit specific management Intent language and related chapter 2 language to make it clearer and easier for adjudicators to make authorization decisions.	Re-worked the language of numerous units to clarify clarify intent and remove any ambiguity.	Re-worked the language of numerous units to clarify clarify intent and remove any ambiguity.
Public Access	Need a state-designated (public use) site somewhere in C-7 (northern) for people to legally park at Klutina Lake once they've come up the Klutina Lake Rd.	The plan provides guidance for establishing and improving access.	Yes
Public Access	Add another route or area within the Tonsina Controlled Use Area, which is already closed for motorized hunting from late July through September.	Beyond the scope of this plan. Controlled Use Areas and management of fish and game activities are under the authority of ADF&G.	None
Public Access	Close H1, H4, H51A, H51B, H52, H53, H54, H60, H63, H7, H8, M2, M3, M3, W1, W7, W14, W16, W17, W20 to motorized vehicles.	Beyond the scope of this plan. Closing areas to motorized vehicles is done through regulations and not this plan.	None
Public Access	Designate non-motorized routes or trails in the Nelchina Public Use Area.	The Nelchina PUA is outside of the planning area boundary.	None.
Public Access	McCarthy Road in need of improvements and straightening.	Beyond the scope of this plan. DOTPF is the agency responsible for maintaining and improving roadways.	None.
Public Access	Improving access to state land in the planning area needs to be reflected as one of the plan priorities. In part, this is driven by increased public use in this area of the state, by both locals and visitors from Anchorage, Wasilla/Palmer, and Fairbanks. New access needs to be reserved or acquired where necessary.	Concur. The plan provides general goals and management guidelines for public access in chapter 2 of the plan. Specific guidance by geographical area can be found in chapter 3.	None
Public Access	Regarding the trails through the area. Are they public access over state lands, native lands, and private property. Or just state lands?	Generally Allowed Uses (11 AAC 96.020) establishes guidelines for travel across SOA lands. RS2477 trails are historic trails that are claimed by the SOA and are shown on AKMapper. 17b easements provide access across native owned lands to SOA lands.	None

Subject	Issue Summary	Response	Recommended Revision
Public Access	There is much discussion in the plan regarding the protection of public access. The proposed solution, according to ADNR, is section line easements. I think relying on section line easements to provide access to state land actually fails to protect public access. How many of the section line easements that the state has established that are actually on dry ground and useable? The state should start looking at all access easements (section line, 17b, RS, RS2477 etc.) on-the-ground before designating them.	The purpose of the plan is to provide guidance for establishing and maintaining a variety of types of public access. Access easements are not designated through this plan. Adjudicators use the guidance in the plan when making easement/access decisions.	None
Public Access	Please see pages 2-44 and 45 (especially see J)of the '86 area plan. It is obvious access was an issue then and remains an issue. Just couple examples of language indicating an issue. A. Future pipeline must have more crossings. B. State needs to Work with Alyeska Pipeline Service Company (APSC) to allow crossing (APSC should be mandated to work with the state). C. Public may not travel parallel to right of way (DNR permit?). D. From a recreational standpoint the 1500 lb. limit needs to be increased as off-road recreational vehicles have improved (got heavier as well).	Beyond the scope of this plan. Access across the Trans-Alaska Pipeline is an easement or permitting consideration.	None
Public Access	The plan talks at length regarding protecting public access to water bodies when remote lands are sold. Through the use of public easements, access easements, buffers, etc., access will be protected. Does DNR follow up land sales to ensure that the required buffers and easements have been implemented and are being respected by the owner?	The application of buffers and easements is determined through a subsequent decision process for a project.	None

Subject	Issue Summary	Response	Recommended Revision
Public Access	The plan emphasizes access as a priority, and its focus is primarily on reserving access when selling land. However, with our growing population, visitation, and tourism, new access is needed where previously it was not. Use patterns are changing. There may be instances where the State needs to acquire access over private or other government land in order to reach state lands. Example: Access to the Copper River for nonmotorized boaters, with launch facilities and parking, would provide better access for Alaskans, as well as for tourists. Tourism is increasing- rafting and fishing businesses in our area are increasing, more access is needed.	Reserving additional public access over private or other government land is done on a case-by-case basis when appropriate.	None
Public Access	I am in support of the revision plan, as long as the privatization of the land does not continue to limit public access. At this time, it is because of private ownership that it is quite difficult to truly experience the area. One must pay a fee that varies from person to person and business to business, based on the relationship or opinion of the land owner who has put in a vehicle bridge over both the Kennicott River and the McCarthy. I have observed the banks of the McCarthy River being dug out by large construction machines, forcing all to use the private bridge at a cost.	Guidance for access is provided in chapter 2 of the plan.	None
Public Notice	Notify CAC of any future material site projects near mile 1 of Edgerton Highway.	This is outside the scope of the plan. Material authorizations are handled through DMLW regional offices and subject to their own regulatory process. F158	No
Recommendation	Scenic highway designation recommendation for Richardson highway.	The request is outside the scope of the plan. Requests to designate a highway would need to go through DOTPF.	No

Subject	Issue Summary	Response	Recommended Revision
Recreation	It is unclear from this plan what the recreation, commercial recreation, and economic activities are and how they would be managed. From what I can tell from Chapter 2, there would not be additional public comment on any of these uses and the uses would be decided internally within ADNR. Is that an accurate understanding of how permitting and decisions regarding the Thompson Special Use area would proceed?	Recreational activities on state land are guided by Generally Allow Uses. Commercial recreational activities are adjudicated through the permitting and lease programs that include a separate public notice component. Within the TPSUA permits are required for special events and commercial transporters of backcountry skiers.	None.
Setback/Buffers	Shorelines and Stream Corridors have proposed riparian buffer of at least 100' and "...preferable to retain larger widths..." adjacent to Anadromous or High Value Resident Fish. The Right of Way went from 50' – 200'. A 200 or more Right of Way should not be allowed, there is no basis for changing this.	This section lists the considerations for riparian buffers not Rights of Way.	None
Setback/Buffers	In addition to lack of management of waste removal planning is a question of water quality and habitat quality for salmon in the region. Building directly on the banks of salmon streams can have detrimental effects on water quality, especially when there is a lack of waste disposal accessibility. It would be safer for salmon and safer for residents that wish to settle in W-16 if there were land evaluations in place that could help select lands that are helping to support erosion reductions, that are supporting important salmon streambank health, that are corridors for wildlife and have important cultural uses for local residents for subsistence.	See chapter 2's Shorelands and Stream Corridors for building setup back information.	None
Technical Correction	Page 3-67 (H-5): Three materials sites are clustered near "Hungry Hollow" (the watercourse that includes Octopus Lake). Hungry Hollow should be added to the list of anadromous waters. The Sport Fish Division of ADFG in Glennallen can furnish details.	Concur. Creek name updated to Hungry Hollow Creek.	Yes.
Technical Correction	3-122, 17. Wortman's and Bear Creek are also anadromous and overlooked.	This plan was developed using the AWC published by ADF&G. Due to the volume of anadromous waterbodies in the planning area, not every anadromous waterbody is called out by name.	None.

Subject	Issue Summary	Response	Recommended Revision
Technical Correction	3-135. Please also change the Tasnuna's status from "No Public Recreation" and "No High Value" to "Off-the-Richter-scale" in both categories. It is a well-used route for winter recreationalists, including snowmachiners, heli-skiers and backcountry skiers.	Concur with changing Tasnuna River Recreation status to Yes in table. Remove "High Value" column from table.	Table updated.
Trails - General	The Kenny Lake trail along the north side of the Tonsina River gorge should be recognized and conserved in the CRBAP. The section of trail recommended here for protection includes the bluff area south of Kenny Lake School extending eastward, roughly two miles.	The plan does recognize this trail as RST 1747 & RST 1413 in the resource allocation table in chapter 3. Chapter 2 provides management guidelines for the protection of trails consistent with the scope of this plan.	None.
Trails - General	There should not be any additional trail systems in the management plan.	There are none in the plan.	None