

North Slope Area Plan Public Review Draft
Issue Response Summary for the Final Plan
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GENERAL COMMENTS TO THE PLAN

Subject	Issue Summary	Response	Recommended Revision
DOG Best Interest Findings	ADNR should ensure that the NSAP is compatible with Division of Oil and Gas (DOG) authority over oil and gas operations and current permitting processes - specifically mentioning BIF and mitigation measures.	The purpose of the Plan is to classify and provide management intent for all activities on state land within the planning boundary. The purpose of DOG Best Interest Findings (BIFs) is to determine if it is in the best interest of the State to provide oil and gas leases in the North Slope area for the 10-year lease timeline. The NSAP and the North Slope BIF are correlating ADNR policies that serve different purposes.	None
Land Classification	Many units where known active oil and gas leases and exploration is occurring and is projected to occur have been assigned Habitat (Ha) or Recreation (Rd) designations in the plan. Designation of these areas as Ha and Rd may preclude future activities unnecessarily and prematurely. Division of Mining, Land and Water (DMLW) should consider the North Slope BIF for regulatory practices.	Regulatory practices are laid out in state statute and regulations not the BIF. DMLW, as well as the Department of Environmental Conservation (ADEC), have regulatory requirements regarding land use practices which are outlined in the plan. All classifications are multiple use. Permits, easements, material sales, leases, and other types of less-than-fee disposals of state lands may be authorized on lands with Ha designation. The identified habitat values for which these lands are classified shall be maintained to the greatest extent practicable. If impacts to the habitat cannot be avoided, they should be minimized through stipulations contained in an authorization. (Page 3-5) NSAP applies to all surface authorizations, on or off lease, Department wide. Oil and gas lease sales are not subject to planning and classification under AS 38.04.065, they are instead subject to the planning process established under AS 38.05.180. (See page 1-9 for how this plan will be used)	None

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Potential Limitations imposed in Plan language	ADNR should avoid making unilateral statements precluding any one type of activity in certain areas. DMLW should allow for discretion and flexibility throughout the plan and within its unit designations. Flexibility would help avoid prescriptive conditions that would preclude specific activities in certain areas.	All state land in the plan is intended for multiple use and should be managed in a manner that is consistent with this mission. However, there are times that specific activities may be precluded if protecting certain values warrant this and it is a statutory requirement for the plan to identify where certain uses can be accommodated or precluded. The NSAP provides for multiple uses of public land, as required by statutes, and the plan objectives provide statements of what the State will do with a resource, use, or activity based on identified goals. In the long-term, the land within the Plan boundary will be used for as many uses as possible, without eliminating, or unreasonably limiting other resources. (See pages 2-3 and 3-5)	None
Dalton Highway Management Master Plan	As stated, this plan will supersede the Dalton Highway Master Plan, but the plan area begins at Milepost 232 near Chandalar. How will ADNR manage state lands within the Dalton Highway Corridor from the beginning of the route to Chandalar?	The plan will not supersede the Dalton Highway Management Plan, but will establish land designations, classifications and management intent in units located within the Dalton Highway corridor region.	Add language to clarify that the Dalton Highway Master Plan is not superseded by the NSAP.
ANCSA Land Ownership	ADNR should include further explanation of how overlap or how adjacent lands might be impacted by the setbacks and the stated land use restrictions in the plan. Further discussion of native-owned land should be had in the NSAP (including potential overlap).	Setbacks would only apply to state lands and would not extend onto adjacent lands within or outside the area plan boundary. The plan does not direct land uses for private, borough, Native, or federal land, and the management requirements of this plan do not apply to non-state lands, or state-owned lands directly administered by the ADOT/PF, which are governed by separate regulations. (See pages 1-1, 1-9, 2-14, 3-1)	None
Technical Correction Plan Wide	Make appropriate technical and editorial corrections. These corrections will not affect policy.	Concur	Change as suggested
Existing Leases or contracts	It should be expressly noted in the purpose of the plan that the plan does nothing to alter, modify, and/or supersede existing terms or conditions of	Concur	Add language to chapter 4 under "Leasing of State Land" to clarify that plan will

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	contracts or leases between any party and the State.		not change existing lease or contract conditions.
Chapter 3 General	Where appropriate, USFWS should be added as the appropriate contact (e.g., contact with polar bears or walrus)	Concur	Change as suggested
Municipal Entitlement	The NSB has not benefitted from past development on the North Slope as much as it should have because its municipal land entitlement has not been fulfilled. State land transfers to the borough must occur more timely in the future. The plan does not state that this is a priority goal. Under AS 29.65, land classified as pre-1983 resource management land (RMG) is not conveyable. The NSAP can potentially vacate or reclassify all land with pre-1983 RMG to classifications conveyable under AS 29.65. In addition, the ADNRC Commissioner retains authority to reclassify lands to conveyable classifications through the decision process. The current draft NSAP does not reflect land classifications that would be the basis for resolving NSB land entitlements. The overselections were not meant to be the only areas of interest for the NSB – they were meant to convey examples to incorporate into the draft area plan – areas within the development units should be identified and conveyed to the NSB for utility uses, material sites and future landfills – and not all of these were included in our conceptual list.	One of the primary purposes for the NSAP is to facilitate municipal entitlement conveyance, which is discussed on pages 1-4, 1-11, 2-1, 2-2, 2-6, 3-10. The plan does in fact propose land classifications on NSB's existing and proposed selections that may be appropriate for conveyance in order to facilitate conveyance following plan adoption. ADNRC is committed to adjudicating NSB municipal entitlement selections in a timely manner. Based on information provided to ADNRC, areas identified in the plan as available for municipal selection far exceed NSB's entitlement acreage.	None
Subsistence Protections	Plan does not reflect land classifications that would protect subsistence uses for area residents. Several proposed land classifications conflict directly with subsistence areas identified in village comprehensive plans and the NSB Areawide Plan.	A land use designation recognizes uses or resources that are of major importance within a management unit but does not preclude other uses. The plan simply tries to identify the most	None

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		appropriate use for specific areas (see chapter 2 language on subsistence).	
	There is a need to incorporate the latest information about each of the herds in the area plan boundary and include guidance for authorizations issued by ADFG, NSB Dept. of Wildlife Management and any other pertinent resource agencies.	Concur. NSAP contains the most current information available at time of publication. ADNR adjudicators must consult with resource agencies for most current information during the adjudication process.	Herd information will be updated in several areas of the plan that were identified during public review.
	Certain nearshore waters should be managed for critical subsistence activities, including in the Barrow area, Kaktovik area, and mid-Beaufort Sea waters near Cross Island. NSB would like to know if these areas will continue to receive heightened protections for the benefit of subsistence users and biological resources as a more permanent element of this planning effort.	Most tideland areas are designated Habitat (Ha) and Harvest (Hv) to acknowledge the importance of subsistence activities and resources. See “Subsistence and Harvest” language in chapter 2 and specific management intent language in chapter 3 for areas identified.	None
Development Nodes	Plan does not identify “development nodes” - centralized locations for industry facilities and services. Development nodes should be identified in Dalton Corridor, near airports, and along the Spine Road. Municipal Entitlement selections are proposed in five basic development nodes within the Borough’s boundary along the Dalton Highway – Deadhorse, Franklin Bluffs, Happy Valley, Pump Station 3/Material Site 119-4, and Galbraith. Two general development nodes are proposed along the Spur Road in the KIC area and near the Colville River (either north or south of the Alpine Pipeline).	The Transportation and Infrastructure section in chapter 2 establishes an “Industrial Infrastructure” goal on page 2-60, to “prioritize and encourage shared infrastructure and facilities within industrial areas to reduce the cost and footprint of new infrastructure.” See page 3-85 for identified development nodes along the Dalton Hwy Corridor.	None
Previous Plans and Decisions	The plan does not address previous site-specific plans and associated municipal entitlement decisions, postponed decisions, or preliminary decisions that were never finalized. Classifications from some previous site-specific plans should be revisited to allow conveyance to NSB, i.e. Deadhorse Airport.	The area plan supersedes all site-specific plans and land classification orders within the plan boundary. All remaining and additional municipal entitlement selections will be adjudicated following adoption of this plan. Land selections that were the subject of postponed, incomplete or rescinded decisions will be adjudicated anew, unless otherwise specified in a final decision. The Deadhorse Airport is managed by ADOT/PF	None

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		through an Interagency Land Management Agreement (ILMA). ADOT/PF has indicated it will not relinquish its management of Deadhorse Airport.	
Guides/Outfitters	ADNR should not have exclusive control of sites used by guides and outfitters operating in areas that affect subsistence activities. The proposed designation of almost 50,000 acres for land disposal and increased concentration of land leasing for guides and outfitters is a real concern. All proposed sites are within North Slope communities' areas of influence and pose threats to their subsistence harvest. These communities are very concerned with the potential for increased guided recreational hunting operations, as such operations have been attributed to diverting caribou migrations from villages.	The Settlement Land and Resource Management Land classifications are used for municipal entitlement as well as state land disposal project areas. These classifications are intentionally placed for potential disposal decisions, which would undergo a separate public notice and comment period during the adjudication process. This will provide an important opportunity for the public to provide input on any proposed land disposals in their area, including Outfitter and Guide leases. Page 2-48 of the plan recognizes the importance of subsistence activities and has several goals related to ensuring that traditional harvesting opportunities are preserved. In areas that receive high levels of subsistence uses, the plan specifies these areas remain in public ownership to conserve the important resources.	None
Oil and Gas Leases & Activities	Where land has been conveyed to NSB subject to oil and gas leases, the borough has been excluded from discussions regarding lease holder's plans of development and operation. State and NSB have parallel interests in developing infrastructure to support oil and gas industry, neither should have exclusive franchise on lands with potential to provide services to industry. NSB should not be treated like a leaseholder but as another land manager with similar interests in long term development.	This plan does not pertain to borough-owned land. The NSAP 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.	None

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DR&R	Plan does not adequately address DR&R issues with respect to utility infrastructure needs and contamination issues.	Language on page 2-5 regarding DR&R partially addresses this, as follows: “if a viable plan for reuse or repurposing infrastructure is proposed in the foreseeable future, DMLW may, at its sole discretion, consider an application from another entity to make use of and maintain the repurposed infrastructure.” Also on page 2-6, as follows: “Where facilities, developments, and infrastructure on state lands are identified for DR&R, the State will work with appropriate regulatory agencies to determine the method and timing of repurposing or rehabilitation that is in the best interest of the State.” Objective D on page 2-33 states, “When siting, operating, or closing material sites, maintaining other uses and resources is to be considered to the maximum extent practicable.”	None
Material Source Sites	In mapping and resource evaluation portion of planning process, important to include most up-to-date information regarding historic gravel/rip rap geotechnical evaluations. Gravel is critical to support oil and gas development as well as highway and airport maintenance.	Concur	None
	Potential material sites may have possible future use as waste transfer locations or possibly solid waste monofills. ADNOR should consider areas such as Mine Site C, the northern area of PUT 23, and areas near Milne Point that were previously rejected for conveyance to NSB for potential water sources or landfills.	Language on page 2-5 regarding DR&R partially addresses this, as follows: “if a viable plan for reuse or repurposing infrastructure is proposed in the foreseeable future, DMLW may, at its sole discretion, consider an application from another entity to make use of and maintain the repurposed infrastructure.” Also on page 2-6, as follows: “Where facilities, developments, and infrastructure on state lands are identified for DR&R, the State will work with appropriate regulatory agencies to determine the method and timing of repurposing or rehabilitation that is in the best interest of the State.” Objective D on page 2-33 states, “When siting, operating, or closing material sites,	None

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		maintaining other uses and resources is to be considered to the maximum extent practicable.” When a material site is no longer in use, a conveyance to NSB may be appropriate at that time. ADNR also reserves the right to adjudicate applications for alternate uses of exhausted material sites.	
	NSB has several material source sites in the Deadhorse area currently in development and additional sites identified for potential development. These regional sites are very important to satisfy development projects and road/pad maintenance in the plan area. Mine Site 102 is not mentioned in the plan as a potential material source, nor are multiple additional material sites ADOT has developed or proposed along the north section of the Dalton Highway. Other potential locations for gravel extraction in the Deadhorse area have been overlooked or ignored during recent evaluations of gravel availability, which is troubling when the need for gravel is so evident. Plan maps should identify all existing material sites (open and closed). Plan should include most up to date estimate of material at sites, and material sites with contracts.	The plan and plan maps are not intended to identify every closed, existing or potential material source, this is more appropriately done in preparation for a specific project or development.	None
	ADOT has monopolized material sites along the Dalton and has opened and closed hundreds of sites in this area. NSB has stated its concern for these excessive, single use gravel sites, which contradict NSB Title 19 guidance. NSB feels strongly that fewer, larger, multi-year material sites should be developed, and would like to see a plan for regional material sites that can satisfy everyone’s needs while minimizing overall impact included in the NSAP.	The plan has established goals regarding material sites, which include a goal to minimize material site impact, as follows: “Sites will be consolidated to minimize impact to other resources, to the extent that is economical or practicable.” (Page 2-31) Objective B on page 2-32 states, “Designated material sites required for exploration and development activities will be limited to the minimum necessary and will include stipulations to minimize the environmental impact.”	None

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Material Source Sites	As important as gravel is, it does not justify all sources being retained by the State.	Material is a conveyable classification under AS 29.65 and the State has often conveyed material sites to municipalities in the past. In addition, Guideline A-6 on page 2-32 states, “unless specifically stated in the management intent, material sites should be considered appropriate in any classification.” See page 3-6 for discussion of how the Materials (Ma) designation was applied in the plan.	None
Water Sources	Key water sources to support surface uses are not readily identified in the plan. Searching for information related to water use by lease holders leads to water use for down-hole operation comingled with surface uses. Proximity of water sources to certain lands is crucial to providing services.	Because the majority of the water needs on the North Slope are focused on industry development, and industry does its own research to locate water sources, a limited number of water sources are identified in the plan. ADNRC adjudicators evaluate water sources for industry needs on a per-project basis.	None
State Land Disposals	Proposed settlement areas identified in the plan for state land disposals require serious discussions among stakeholders prior to being allowed. Five large disposal areas are identified in Brooks Foothills, Chandalar and Central Slope. These areas have potential conflicts with village areas of influence and local subsistence uses, and potential issues with public safety and air traffic.	See page 2-48, the plan recognizes the importance of subsistence activities and has several goals related to ensuring that traditional harvesting opportunities are preserved. In areas that receive high levels of subsistence uses, the plan specifies these areas remain in public ownership to conserve the important resources. Any proposed state land disposal is subject to a rigorous public process and review and must comply with these provisions in the plan. Management intent for these areas specifies that ADF&G shall be consulted throughout the process.	None
Climate Change	Broader consideration should be given to climate change and its effects on long-term authorizations. NSB would like assurance of a meaningful role in management of the area’s rapidly changing marine and terrestrial ecosystems. Management must be adaptive and driven by the results of consistent and comprehensive scientific studies.	Concur	Add to overall management direction in chapter 2 language to address emerging issues related to climate change.

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Comments on the virtual meeting	General comments about the inefficiencies of virtual meetings and requests for in-person meetings. “[The plan] deserves and needs a far more robust public process” Requests for extension of public process and/or delay of publication until a more robust process can be held in person for public input.	The State can no longer delay completion of the planning process because fulfillment of NSB municipal entitlement depends on it. During public review, travel restrictions were in place and the State did not wish to put communities in the planning area at risk by holding in-person public meetings during a global pandemic. After various requests, the comment deadline was extended from 60 to 90 days.	Update Public Participation in Planning Process section in chapter 1, page 1-10 to reflect accommodations made in planning process.
Maps	Maps are inaccurate, confusing and misleading. Several roads identified as secondary roads appear to be ice roads. Maps should differentiate seasonal ice roads from gravel road infrastructure.	Concur	The maps will be improved to differentiate between seasonal ice roads and permanent infrastructure.
Maps	Maps do not identify potential borough municipal selections.	North Slope Borough’s current selections and proposed selections are identified in the Resource Allocation Tables under Resources and Uses in chapter 3.	None

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CHAPTER 1 – INTRODUCTION

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p. 1-12, line 10-12 Oil and Gas Leasing	At least four NSAP-designated regions (Arctic Tidelands, Arctic Coast, Central Slope and Dalton Corridor) of the six NSAP regions have, or will have, established oil and gas leases. Parameters established during the oil and gas planning and construction process should coincide with those established in the NSAP. It would be informative to describe how the parameters established in existing and future Oil and Gas lease sales and those presented in the NSAP overlap, especially as regards to fish and wildlife habitats.	NSAP applies to all surface authorizations, on or off lease, Department wide. Oil and gas lease sales are not subject to planning and classification under AS 38.04.065, they are instead subject to the planning process established under AS 38.05.180. (See page 1-9 for how this plan will be used)	None
p. 1-12, lines 25-30 Water Resources	This paragraph is ambiguous and the State's intent with regards to water use is unclear. As a whole, the paragraph markedly favors instream reservation use and wetland preservation. It is recommended to revise this language to provide that ADNRC considers multiple uses for water resources and uses a collaborative process to prioritize instream flow, maintenance of wetlands, industrial uses, and other uses.	Chapter 1 of the plan describes what the plan will do, chapter 2 of the plan provides goals, objectives and guidelines regarding water resources. The paragraph at lines 25-30 explains that the plan will do two things, one is to designate areas to be managed for water resources, the other is to describe management guidelines for instream flow reservations.	None
p. 1-14, lines 7-9 Plan Amendments	Revise the language to prevent unilateral amendment by subsequent directors without public review and relevant agency consultation.	Plan amendments are addressed in chapter 4, see page 4-12 for a description of the process and requirements. A plan revision is subject to public review.	None

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CHAPTER 2 – AREAWIDE LAND MANAGEMENT POLICIES

Subject	Issue Summary	Response	Recommended Revision
Guideline numbering system	Organizationally, the objectives and guidelines should not start over at “A” for each topic. Multiple references to the designation “A-1”, for example, creates confusion when referencing the guidelines.	Concur	Change as suggested
p. 2-2, lines 12-15 DR&R	This plan should not specifically limit DR&R obligations to only oil and gas infrastructure. Oil and Gas development is not covered under this plan, however the abandonment of Oil and Gas development is considered under the plan. Restoration of impacted fish and wildlife habitat likely will require an expanded timeline and development of new techniques that consider climate change.	Activities & infrastructure requiring remediation on North Slope are predominantly oil and gas related. The area plan is intended to provide an overall management strategy for state lands within the planning area, which includes surface authorizations required for oil and gas development and abandonment.	Add qualifying word “predominantly” to page 2-2, line 14.
p. 2-2, line 22 Stylistic Change	Should change to say, “Where possible, avoid, or minimize...”	Concur	Change as suggested
p. 2-2, lines 33-34	Strike “Pollution Remediation” sentence, instead simply refer to DEC requirements	This is a plan goal, and it is appropriate for the plan to have goals of this nature. Guidelines later in the plan refer to DEC requirements.	None
	Should change “releases of pollutants will be reported and remediated <i>in a timely fashion</i> ” to “... pollutants will be reported <i>immediately upon discovery, and remediated in a timely fashion...</i> ”	Concur	Change as suggested
	The Fish and Wildlife Service should be notified if spills/discharges impact our trust resources and/or their habitats. Please contact our spill response hotline: (907) 242-6893 / fwsakspillresponse@fws.gov, or the National Oil or Chemical Response Center: (800) 424-8802.	Concur	Add contact information to guidelines section where appropriate.

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p. 2-2, lines 36 Stylistic Change	Change Public Health and Safety goal to read, "Maintain or enhance public health and safety for North Slope residents and other users of state land and resources."	The plan is for all users of state land, which includes North Slope residents.	None
p. 2-3, lines 1-3 Quality of Life	Document appears to focus only on land and water discharges and doesn't seem to apply to air discharges. Suggest adding definition of Air Quality: "to be maintained in accordance with state and federal requirements." Alternatively suggest the term "air" be removed from the definition of pollutant currently in plan.	The word "air" will be removed from the sentence, as suggested.	Change as suggested and remove "air" from Quality of Life Goal.
p. 2-3, line 5 Stylistic Change	Change Recreation goal to read, "...land managed for multiple uses while <i>ensuring public safety, health, and welfare, and</i> protecting natural resources and public access."	This is addressed in the Public Health and Safety goal on page 2-2.	None
p. 2-3, line 12 Subsistence management	Change Subsistence Harvest Areas goal to read, "Work with local entities, including the North Slope Borough, local municipal governments, tribal governments, and ANCSA corporations to transfer lands as appropriate to establish an ownership structure that will ensure continued subsistence harvest and other traditional use opportunities."	See page 2-48, the plan recognizes the importance of subsistence activities and has several goals related to ensuring that traditional harvesting opportunities are preserved. In areas that receive high levels of subsistence uses. The plan specifies these areas remain in public ownership to conserve the important resources.	None
p. 2-3, line 15 Stylistic Change	Change Sustained Yield goal to read, "Manage renewable resources <i>and the integrity of natural systems...</i> "	The sustained yield principle is a constitutional mandate.	None
P. 2-3, LINES 23-24 Water Quality	A definition of the word "adequate" as per use would be helpful, as it seems the definition of the word will change with the proposed use of the water.	Concur	Add definition of "adequate" to glossary, as follows: "sufficient for a specific need or requirement."
P. 2-3, LINES 29-34 PLAN OBJECTIVES *climate change*	Climate change will determine the extent and type of infrastructure development and land restoration techniques. Sea level rise and lack of sea ice to mitigate storm surges will impact coastal areas. Increased rain fall and thawing permafrost will	Concur	Add reference to climate change considerations in Overall Management Direction on page 2-1.

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	require alteration of existing infrastructure and new methods of construction over time. All of these changes likely will alter the distribution and populations of the Service's trust resources.		
p. 2-4, line 1 Plan Objectives, DR&R	The plan needs to clarify how DR&R implementation incorporates past, present and future decisions made by DEC divisions-SPAR, EH, to ensure regulated community can adequately and practicably meet state requirements. E.g. it's unclear if DEC/SPAR will remain the regulatory agency for contamination response and remediation and if DEC/EH-Solid Waste Program will retain final say regarding landfills or if ADNR will have final say recontamination response/remediation. If the plan is effective for 20 years, and land conveyance (involving landfills) could occur, which state dept/div/program has final ruling on cleanup levels, monitoring requirements, institutional controls, etc.? These questions must be resolved and explained before final plan issued.	DEC determines if/when state standards regarding contamination are met, ADNR determines if state standards for the condition of land are met. The plan does not alter these authorities. ADNR provides landowner consent to allow solid waste sites to be permitted on state land. This is required by DEC regulation. DEC/SPAR/CSP requires landowner consent to close contaminated sites with contamination above regulatory cleanup levels in place. If contamination remaining in place rises to the level of a disposal of interest, then a ADNR-decision and public notice will be required to give landowner consent and sign an environmental covenant allowing closure. In some circumstances ADNR may require more stringent cleanup than DEC requires.	Reword sentence as follows: "To maximize timely and through pollution remediation to minimize long-term impairment and monitoring needs according to state standards." Throughout the plan, add clarifying language pertaining to DR&R where needed.
p. 2-5, lines 1-5 Plan Guidelines, DR&R	It should be clear that "Plan Guideline D" is general guidance rather than a requirement e.g. only a small amount of state land is identified as needed for residential use. To pre-determine that future uses of all lands must be suitable for residential use could drive remediation to meet unnecessarily low cleanup standards that could only be met by invasive/removal measures that destroy or impair resources (ecosystems) of greater value to Alaska (e.g. removal of tundra mat and permafrost degradation).	p. 2-4, Plan guidelines, clarifies that guidelines range in their level of specificity. Furthermore, permissive language in guideline D implies that ADNR may, at its discretion, consider proposals for activities through restricted use authorizations. However, the standard of unrestricted use remains the goal.	None

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p. 2-7, lines 11-16 Plan Guidelines, buffers, easements, and setbacks	Many “small waters” converge to form navigable waters, and therefore may be critical to the downstream riparian landscape. In addition, even “small waters” likely support fish and wildlife along some aspect of the food chain.	Where sensitive habitat or other environmental resources exist, guideline B-6 gives guidance for protection easements and setbacks adjacent to non-anadromous waterbodies. If there are anadromous fish present in a waterbody, it would not be considered “small waters” and would require a sensitive environmental features buffer, per Table 2-1, item 4, on page 2-13.	Change reference from “small waters” to “ancillary waters” throughout the plan.
p. 2-7, lines 21-23 Water Quality	Watersheds determine the quality and quantity of downstream rivers and streams important for fish and wildlife, and therefore should be protected across the landscape, not just those supplying community drinking water.	Clarify Water Quality goal language to indicate watersheds are protected for all uses.	Drop last sentence in Water Quality goal.
p. 2-8 Guideline A-2 Buffers, Easements, Setbacks – state owned waterbodies Objectives & Management Guidelines	The phrase, “to minimize on-going management responsibilities or for some other public purpose” is vague and ambiguous. ADNR should revise to clarify intent. Suggest “Alternatively, a riparian buffer can be considered”	The use of “should” is intentional, to imply that if the riparian buffer is not retained in state ownership, a setback or easement should be imposed to protect high value waterbodies.	None
p. 2-8 Guideline B-1	Guideline B-1 (page 2-8) states that “ADNR will place a higher priority on protecting public use values in stream corridors than on providing opportunities for private ownership or development of land.” In an area with abundant wetland habitat and streams like the North Slope, public use should be considered commensurate with other uses of the land. It is accurate to say that access to and use of stream areas will be designed to ensure protection of fish and wildlife and in compliance with DOG mitigation measures. Further, oil and gas infrastructure on the North Slope provides countervailing impacts that should also be acknowledged, such as improved access for local	ADNR recognizes that some industry infrastructure also enhances public access and use of state land. However, ADNR is obligated to place priority on public access and use of public lands, and to minimize conflicts with such use.	None

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	residents. There is evidence that industry constructed roads, subsistence pull-outs, and boat ramps improve accessibility and enhance local use of the area. The NSAP should note that access to land for public use and development of land are not mutually exclusive activities on the North Slope.		
p. 2-9, lines 12-15 Water Quality Guideline	B-4: "These activities" While setbacks are generally protective of fish and wildlife resources, it would be helpful to define what "these activities" are referring to and if they include the B-3 Guidelines.	Concur	Replace "these activities" with "the activities described above in Guideline B-3"
p. 2-11, line 3 Guideline B-8	"Sensitive environmental features" should be defined/referred to in text.	There is no legal definition, however ADF&G or USFWS could identify a wetland as sensitive based on its importance to the species over which each particular agency has management authority. Different types of sensitive environmental features are described on page 2-13.	None
p. 2-11, lines 31-34 Guideline B-9	Is this language [language about easements being noted on the lease, patent, or subdivision plat] apropos to the North Slope? Does it apply to a Native Villages where the lands are owned by Native Corporations?	AS 38.05.127 applies to all state land. If land was transferred directly from the federal government to another entity, only those restrictions in that conveyance document would apply.	None
p. 2-14, lines 29-33 Guideline A-1	These guidelines are duplicative and are covered by state statute. They should be removed from the plan to avoid duplication & overlap.	These guidelines contain important guidance for public participation in the planning process, and they expand on the requirements in state statute and regulation.	None
p. 2-14, lines 34-39 Guideline A-2	Shore lands should be defined with respect to water (salt and/or fresh) and their location on the landscape.	Shorelands are defined in the Appendix on p. A-11. See p. 1-3, figure 1-1, for depiction of how the state differentiates between tidelands, wetlands and shorelands.	None
GENERAL USFWS	"to minimize habitat loss" is an insufficient standard.	This is a state standard used by ADF&G, see AS 16.20.020.	

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GENERAL USFWS	We encourage applicants for proposed projects within coastal areas to review our Pacific walrus guidelines ¹ and to contact the Service's Marine Mammals Management Office in Anchorage (FW7_MMM_reports@fws.gov) to develop an appropriate mitigation plan to minimize any potential effects on walrus.	Concur	Add language to management intent in chapter 3 requiring consultation with NMFS and USFWS where marine mammals are present.
GENERAL USFWS	We suggest developing a collaborative/working partnership with the State to outline management protocols for these resources. Development and implementation of Best Management Practices (BMPs), proactive planning, and permit stipulations at early stages of project development, would allow the opportunity to apply emerging science and develop recommendations for management of these shared resources. We welcome the opportunity to work collaboratively with the ADNR to develop mutual BMPs to avoid and minimize impacts to our shared resources within the NSAP.	Concur	Add goal (or objective) of federal and state agency collaboration for future North Slope mitigation measures.
USFWS on DR&R	The Service suggests a collaborative, multi-agency, multi-year concerted effort to locate, remove, and restore contaminated sites within the NSAP.	Concur	None
USFWS on Ice Roads	The Service recommends, when practicable, using water sourced from non-fish bearing lakes. When necessary, water withdrawals from fish-bearing lakes may be sourced with limitations regarding minimal water depth, fish species, and screens to prevent uptake of over-wintering fish. In addition, ice and snow roads should be routed through tundra to avoid unique/scarce habitats and habitats susceptible to compaction and slow green-up. Efficacy of ice road construction and use in the foothills may be minimal.	This is the current practice for such activities on state land on the North Slope.	None
p. 2-16, lines 7-10	We agree and encourage a temporal approach to assessing current and future impacts to fish, wildlife, and their habitats.	Concur	None

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Fish and Wildlife Habitat			
p. 2-16, lines 6-14 Fish and Wildlife Habitat	The Service agrees with climate change impacts on fish, wildlife, and their habitats. Coordination with municipalities and State and Federal resource agencies is important through current and future development processes on the North Slope.	Concur	None
p. 2-16, lines 16-17 Fish and Wildlife Habitat	Recommend delete reference to polar bears as “terrestrial mammals.” For management purposes, polar bears are not terrestrial mammals but marine mammals. Lines 26-31 do correctly refer to polar bears as marine mammals which occupy both marine and terrestrial habitats.	Concur	Change as suggested
p. 2-16 Caribou	The Porcupine Caribou Herd (PCH) should be included on Page 2-16. Though their use of the area is limited (similar to the Western Arctic Herd) and the majority of their range occurs in the Arctic National Wildlife Refuge and in Canada, there is still some mixing with the Central Arctic Herd that should be noted. The PCH is listed under Species Specific Management Guidelines and should also be noted in this section.	Concur	Change as suggested
p. 2-17, line 35-37 Goal: Contribute to Economic Diversity	The term “protect” should be changed to “manage.” The use of the term “and non-consumptive uses” is ambiguous and confusing. It is unclear if “non-consumptive uses” is a stated goal of the plan. To the extent that it is a goal, it should be noted that the oil and gas and mining industries are “consumptive” by their very nature. Providing that a goal of the plan is to “contribute to economic diversity” through “non-consumptive uses” contradicts the objective of the NSAP to provide opportunities for oil and gas development.	ADNR’s goal is not to merely manage these resources, but to protect them, while allowing for various uses, including those that contribute to economic diversity. The goal is also to manage the area to provide opportunities for both consumptive and non-consumptive uses, such as hiking, boating or wildlife viewing, where one does not conflict with the other.	None
p. 2-18, line 9	This stated objective is overbroad and ambiguous and will result in inconsistent application. Fish and	The intent of the plan is to provide management guidelines for multiple uses on all state land. Any	None

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Objective A	wildlife habitat areas “whether or not... classified as Wildlife Habitat Land” describes nearly all state-owned land in Alaska.	given area does not have to be designated as Habitat land to warrant protection, since fish and wildlife habitat are present across Alaska. These are important values to consider when authorizing uses on state land, regardless of land classification.	
p. 2-18, line 15-16 Guideline A-2	The term “minimized” should include qualifiers to avoid ambiguity and inconsistent application. Suggest the following change, “Avoidable impacts to fish and wildlife habitat areas should be minimized to the extent feasible when authorizing development and infrastructure projects.”	The term minimize is commonly used in any resource agency authorization process. See AS 38.04.005.	None
p. 2-18, line 32 Guideline B-1. Habitat Manipulation: General Requirements	Revise first sentence of Guideline B-1c to read, “The state shall manage its lands and waters to avoid or reduce the introduction and/or the spread, of invasive non-native plants and animals, consistent with the requirements of 11 AAC 34.” Also, add sentence to the guidelines providing, “On the North Slope, the quality control and assurance of imported materials used in erosion control is a particularly effective means to meet this Objective.”	Concur	Change language at line 2, page 2-18 to read as follows: “State lands are to be managed to avoid the introduction, and reduce the spread...” to be consistent with Goal title. Also add language regarding quality control and assurance similar to suggested.
p. 2-19, lines 24-27 Objective B Guideline B-4c	Guideline B-4c (page 2-19) regarding Fish and Wildlife Habitat states “[u]ses that are likely to produce levels of acoustical or visual disturbance sufficient to disturb sensitive life stages may be authorized with spatial or temporal restrictions that eliminate or minimize the disturbance during the sensitive life stage period.” OSA recommends adding “when practicable” to the guideline. In general, OSA encourages DMLW to maintain flexibility in the NSAP, maintain consistency with the intent of the State’s Best Interest Finding, and defer to DOG’s mitigation measures where relevant.	The guideline as written allows for adequate flexibility during the authorization process.	None

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p. 2-21, lines 7-9 C-1c Mitigation	The state guideline is confusing and ambiguous. ADNOR should consider revising the language to better define its intent.	Concur. Language is unnecessary and confusing.	Strike Guideline C-1c and renumber.
p. 2-24, lines 33-44 Species Specific Management Guidelines	The denning discussion for grizzly bears and polar bears should be separated as they have different denning concepts (tundra vs. snow) and different regulatory programs and agency oversight. Industry works with ADNOR for grizzly bear dens and USFWS for polar bear dens.	Concur	Change as suggested
p. 2-25, line 12 p. 2-26, lines 22-28	Timing windows for migratory birds nesting on the coastal plain and northern foothills are June 1-July 31; for birds nesting within the Brooks Range nesting may begin in early to mid-May; golden eagles may begin nesting as early as March, depending upon the location. The Service's recommendations for avoiding land-disturbing activities can be found at: https://www.fws.gov/alaska/pages/nesting-birds-timing-recommendations-avoid-land-disturbance-vegetation-clearing .	As noted in the guideline, this consultation would occur and be considered during adjudication for specific projects or activities.	None
p. 2-25 marine mammals	It is unclear from the text what would be considered a "haulout" and under what conditions activities shall not be authorized, if and when, for example a company received the required authorization under the Marine Mammal Protection Act. Further, the national Marine Fisheries Service (NMFS) and State of Alaska Department of Fish & Game should be listed along with the USFWS as together they manage the marine mammals referenced in this paragraph.	Noted	Add language to management intent regarding consultation with NMFS and USFWS. Add guidelines regarding placement of infrastructure in coastal areas in Transportation and Infrastructure section and in Subsurface Resources section of chapter 2.
p. 2-26, lines 22-28	The Colville River Delta mudflats and the salt-marsh habitats immediately west of the Delta provide very important (and unique in terms of size) fall staging habitats for a variety of shorebirds and	As noted in the guideline, adjudicators would consult with ADF&G and USFWS to determine appropriate mitigation or avoidance measures such as those suggested here. Additionally,	

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	waterfowl on the North Slope. Suggest minimal to no additional infrastructure on and adjacent to the Delta, and removal of existing structures as soon as possible after abandonment to minimize impacts to the Delta through deposition of gravel and abandoned infrastructure.	guidelines regarding placement of infrastructure in coastal areas will be added.	
p. 2-29 Cultural Resources	Commenter agrees that preservation, documentation, and interpretation of cultural, heritage, and historical resources must be an integral component of the NSAP. The Plan must be more explicit, however, in clearly defining the role of the Inupiat people of the region in implementing those goals. Any effort must begin with the recognition that the Inupiat culture is alive and well today, and extends in an unbroken continuum back to the age of any human sites and artifacts present in the Plan Area. With that in mind, the goal on page 2-29, lines 32-35, that “the scientific, historic, and cultural heritage values embodied in these resources may pass undiminished to future generations” should be clarified to indicate that the “values” embodied in the resources being passed on should be Inupiat values. As such, the Borough, through our Department of Inupiat History, Language and Culture (IHLC), should be a partner in any preservation, documentation, or interpretation effort, and that partnership must begin upon the discovery of any site or material of potential historic or cultural importance. This section needs more discussion of traditional and contemporary indigenous knowledge possessed by the Inupiat residents of the North Slope. That knowledge is critical to the proper preservation, documentation, and interpretation of cultural and historic sites and materials known and discovered within our region. The IHLC, as well as any North Slope communities within whose use areas such discovery is made, should be immediately notified	The language in this goal is taken directly from the Alaska Historic Preservation Act and is meant to apply to all areas of the State. The area plan is not intended to introduce new standards for cultural resource surveys, inventories and reports. The guidelines under Objective A on pages 2-29 and 2-30 describe standard practice for preservation and protection of historic and cultural resources on state land, which is under the authority of the Office of History and Archeology (OHA). OHA maintains the Alaska Heritage Resources Survey (AHRs) inventory of historic and cultural resources and coordinates cooperative efforts for planned surveys and inventories between state, federal, and local or Alaska Native groups, such as the Borough’s IHLC. OHA would also coordinate with IHLC or any other appropriate local entity regarding ultimate ownership of any discovered or identified artifacts.	Rewrite the paragraph on lines 16-21 on page 2-29 to provide more information about Inupiat culture.

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	and play a role in determining appropriate next steps. Finally, it should be made clear that the ultimate ownership of any artifacts and other associated materials relating to the history, culture and traditions of the Iñupiat people must be placed with the IHLC, or other appropriate local entity.		
p. 2-30, lines 6-17 Heritage and Cultural Guideline A-2	Guideline A-2.3. should be changed to become an example under Guideline A-2.2. because, as written, Guideline A-2.3. is too restrictive. For example, the establishment of a buffer of certain dimension around certain cultural resource sites which are eligible for nomination to the Register of Historic Places for intrusive uses of state land. Also, Guideline A-2.2. should reference the federal Section 106 process and NSB regulations to improve the guideline's use in resource protection and to reduce confusion in the application process. For example, USACE initiates consultations with Alaska SHPO for a project that could potentially impact archaeological sites.	ADNR chooses not to diminish the importance of significant cultural resources by dropping the buffer requirement. This guideline references the state's process for protection of cultural resources, independent of the Section 106 consultation process. This area plan is not meant to detail all federal NEPA requirements.	None
p. 2-31, lines 4-30 Material Sites	Text indicates the State will designate material sites necessary for development and maintenance of infrastructure during the planning period and will retain in state ownership unless determined by the Commissioner to be in state's interest to dispose of the land. Access to material sites that are economically viable to both parties is an important support to industry operations. No objection to municipal ownership of lands containing material sites; mutually beneficial economic balance is possible.	Noted	None
p. 2-31, lines 16-17 Material Sites	Material sites should be developed according to plans established by ADNR to minimize footprint and eliminate degradation of adjacent habitats	Material sale contracts on state land must have a ADNR approved development plan, and all	None

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	once the sites are abandoned. Abandonments/restoration criteria likely will change according to location of the material site. The Service can provide information regarding mining plans and restoration criteria for the North Slope.	material sites must have a ADNRP approved reclamation plan, regardless of land ownership.	
p. 2-34 Comment for entire Public Access section	Any actions that would increase public access to North Slope lands must be accompanied by a detailed plan clearly identifying responsibilities, capabilities, and funding to provide necessary associated services and facilities ensuring the safety and well-being of travelers and protection of wildlife and the environment, including public safety, search and rescue, wildlife enforcement, communication, and sanitation services.	The State has a responsibility to facilitate public access in order to make lands available for maximum use. The objectives and guidelines in this section are meant to minimize conflict or impacts to competing use of the resources and protection of the natural environment. The detailed planning efforts suggested in this comment are beyond the scope of this plan.	None
p. 2-34, lines 16-25 Public Access	Access roads should be set back from the coast to avoid future impacts from sea-level rise and storm surges. Road construction should be completed in the winter to minimize impacts to staging, nesting and brood-rearing migratory birds.	Concur. This is addressed in the guidelines under Objective C on page 2-38.	None
p. 2-36, lines 23-25 Public Access Guideline A-9	Oil and gas producers must be able to limit access to working oil fields for public safety and infrastructure security. Moreover, oil and gas producers cannot have limited access to state lands on which their production facilities, pipelines, and wells are located. Immediate access for operational and emergency response is necessary.	See guideline A-9 on page 2-36, which addresses limiting access. In addition, applicants may apply for a private easement for exclusive use of an access route.	None
p. 2-37, lines 19-28 Objective B-3	These guidelines contradict recent stipulations from NSB permits which state that access roads and driveways shall be constructed and maintained at a maximum bottom width of 48 feet across and a maximum top width of 36 feet. Support the state's increased sizes due to requirements for movement of heavy equipment, drill rigs, etc., but this inconsistency should be resolved before plan is finalized.	The plan applies to state land within the planning area and would not apply to borough land or alter any borough requirements.	None

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p. 2-39 Recreation Tourism and Scenery	Include the Canning River as one of the “main river corridors.” The Canning River corridor is visited frequently by hunters and rafters. More information on use of the Canning River corridor can be found in the Arctic National Wildlife Refuge Public Use Summary ¹ and recent addendum (USFWS 2020).	Noted	Insert Colville and Canning Rivers at line 12-13 page 2-39.
p. 2-43, Line 17 Settlement	The NSAP must recognize that the NSB is a regional home-rule government and, as such, retains all powers not specifically prohibited by its charter. Those powers include significant planning and zoning authorities. To implement our Comprehensive Plan, the Borough has by ordinance adopted detailed land use governing the use and occupancy of land, may include but are not limited to, zoning regulations restricting the use of land and improvements by geographic districts; land use permit requirements designed to encourage or discourage specified uses or minimize unfavorable effects of uses; and measures to further the goals and objectives of the comprehensive plan.	The area plan applies to state land within the plan area and would not govern activities or development on borough land. Local borough management plans and restrictions would apply to municipal land within the plan area.	None
p. 2-43, line 24	Thus far, most state lands on the North Slope utilized for industrial development are leased with environmental stipulations. The stipulations associated with these developments protect the land and gives the state authority over-use and reclamation. The sale of North Slope lands for private commercial and industrial uses may incur irreversible impacts and subsequent abandonment, resulting in substantive environmental degradation to habitats used by our trust resources. We suggest the State work with other state and federal agencies to create stipulations for private commercial and industrial use, to include contaminant storage, downstream air and water quality, and possible rights-of-way to the Dalton Highway.	Any proposed state land disposal is subject to a rigorous public process and review and must adhere to guidance and management intent in the area plan related to protecting or minimizing impacts to the natural environment.	None

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p. 2-50	Page 2-50 omits inclusion of the Placer Unit	Noted. Will omit individual names of oil and gas units.	p. 50 lines 31-32, reword as follows: "As of the date of this area plan, ADNRP actively manages thirteen oil and gas units on the North Slope."
p. 2-53, lines 13-17 Subsurface Resources Guideline A-8	Important to note oil and gas planning and decision-making fall under DOG statutes. To avoid confusion, plan should clearly delineate between DMLW permitting and DOG permitting (e.g., work on stream crossings within oil and gas leased land).	Noted. The DOG statutes are listed on line 16, and the guideline states that the processes governed under those statutes are not included as part of ADNRP area plans.	None
p. 2-57, lines 6-11 Transportation and Infrastructure	Industrial ice roads across tundra and sea ice are another important aspect of transportation on the North Slope. Given the ubiquitous use of ice roads, industrial ice roads & snow trails should be addressed in this section. Ice roads have minimal impacts to underlying tundra or ocean tidelands, vastly increase the tundra travel season on the slope and can in some cases eliminate need for permanent gravel roads to access exploration sites, well pads, water sources, mine sites and other oil and gas infrastructure. The only mention of ice roads in the PRD is in relation to the CWAT trail and as an activity that has been permitted within various units in the plan tables. Further, properly engineered ice roads are heavy duty industrial roads that can accommodate larger equipment than existing gravel roads. They allow equipment, drill rig, and vehicle access to sites that are inaccessible during summer, such as offshore islands or sites not connected via gravel roads. Ice roads and snow trails are also critical in providing increased emergency response capability to remote sites and villages across the slope.	Ice roads and trails are addressed throughout the plan, including in the Public Access, Transportation and Infrastructure, and Water Resources sections in chapter 2, as well as in chapter 3. See P. 2-56, which contains language addressing the importance and advantages of ice roads and trails on the North Slope.	Additional detail regarding ice roads will be included throughout this section.

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	Snow trails are quicker and easier to construct and are used for light duty tundra travel, for pipeline maintenance or inspection work, and for equipment/personnel transport with tracked vehicles. Similarly, ice trails are cleared between onshore and ocean tideland facilities, with tracked vehicles used to transport equipment/personnel.		
p. 2-57, lines 28-39	West Dock Causeway, Endicott Causeway, and Badami Barge Landing and Dock should be mentioned in this section on marine transportation and port facilities as these are critical infrastructure for oil and gas development and should continue to be used for oil and gas purposes. Moreover, facilities on artificial islands use barges each year to support operations.	Noted. The plan mentions general locations where barge service and marine transport occur across the North Slope, including but not specific to oil and gas development or uses.	None
p. 2-58, lines 18-23 Infrastructure	Oil fields in the Arctic Tidelands region containing existing infrastructure are missing from this list (for example West Dock and Nikaitchuq). ADNIR should list all existing infrastructure in each of its regions. The plan also incorrectly states there is infrastructure for the Liberty Project (any remaining modules and buildings are all on SDI within the Duck Island Unit). The Liberty Project should be removed from the list of locations with existing infrastructure in the Arctic Tidelands Region. Moreover, the Liberty Project lease area is not on state land and therefore is not within the state's jurisdiction. Finally, "Ooguruk" is misspelled, change to "Oooguruk."	Noted	Fix misspelling. Remove reference to Liberty Project. Strike sentence lines 20-22. Reword sentence end of line 22: "Infrastructure in the Arctic Coast and Arctic Tidelands regions include, but are not limited to..." Add Oliktok Dock to the list.
p. 2-58, lines 38-45 Oil pads, oil wells, pipelines, facilities	Use of the phrase "are stored" infers that use of reserve pits for storage of drilling mud and cuttings is an ongoing practice. This is incorrect. Although some reserve pits may contain drilling mud and cuttings from past storage, these materials are no longer placed in reserve pits. Moreover, reserve pits are subject to regulation by the Solid Waste	Noted. Reserve pits are regulated by the Solid Waste Program under 18 AAC 60 and when contaminants are released from reserve pits they are also regulated by DEC SPAR under 18 AAC 75.	Reword, strike reference to use of reserve pits on lines 40-41. Also strike last part of sentence line 43-44 "that are now categorized as contaminated sites."

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	Program under 18 AAC 60. And while a documented release from a reserve pit could become a contaminated site, the pits themselves are solid waste sites.		
p.2-60	Under Goals (page 2-60), the NSAP mentions prioritizing and encouraging shared infrastructure. OSA supports reducing the footprint of new infrastructure where practicable but encourages DMLW to include “to the extent practicable” within the text.	Noted	None
p. 2-60, lines 8-10 Spill, Contaminated & Solid Waste Sites	ADEC does not have any formal regulatory authority with regard to the RCRA Orders. The RCRA Orders are between BPXA (Respondent; now Hilcorp North Slope, LLC) and EPA.	Noted. ADNR recognizes that ADEC does not have formal RCRA authority. It is ADNR’s understanding that within the PBU, DEC and EPA attempt to coordinate RCRA and DEC regulatory requirements in consultation with landowners for efficiency.	Reword sentence as follows: “Where the Orders apply, ADEC and EPA may coordinate their regulatory effort in consultation and coordination with ADNR and other landowners.”
p. 2-60 and 2-61, lines 36-44 and 1-34	Pages 2-60 and 2-61 provide the NSAP’s areawide transportation and infrastructure goals. Recommend adding as first goal safety and well-being of Alaskans, as well as for Alaska’s oil and gas workers.	Concur	Add new goal regarding safety and community well-being.
p. 2-61, lines 8-9 Long-term Sustainability	Language is ambiguous and unclear. Change to reflect ADNR’s actual intent. DR&R planning measures will be captured in the eventual DR&R Plan, mentioned on p. 4-11, and components of the plan should not be pre-determined here.	Noted	Combine goals of long-term sustainability and DR&R. Remove language on page 4-11, lines 39-43, and references to DR&R “plans” throughout document.
p.2-61, lines 26-27 Contamination Management	Unrestricted use standards are not necessary because future unrestricted land use in current industrial areas of the North Slope is unrealistic. Additionally, the text, “relatively few parcels are suitable for possible residential development...” appears in the plan at page 2-43, line 26. This statement confirms that not all land should be	ADNR will evaluate how to reframe these terms to make it clear that from a land management perspective, whenever possible contamination should not restrict land use and that if contamination is proposed to remain at levels that restrict use, ADNR may need to write and public	Add new guideline D-3 on 2-63

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	managed for future unrestricted use. Practical future uses should drive decisions. Unrestricted use is not always appropriate as stated throughout the plan and should not be the standard for all lands. Economic impracticability should also be considered. It is unclear which state agency/division/program has ultimate say as to when this goal is met. Therefore, the phrase “unrestricted use standards,” in reference to contamination management, should be removed from the NSAP entirely. The term “technically impracticable” and “unrestricted use standards” are not defined in the PRD. These terms have been the subject of discussions with the US EPA and their meanings have not yet been resolved. Their inclusion as standards to be met in this plan is premature.	notice a decision to allow contamination to remain and to sign an environmental covenant.	
p. 2-62, lines 4-7 Guideline A-2	This is impractical and will severely restrict future oil and gas development on the North Slope. Although pad footprints have reduced and drilling technology improved, drilling distances have special limitations and pads must be able to move to access oil and gas resources. Industry infrastructure is currently located within the plan’s stated setback areas. Requiring relocation or removal of existing infrastructure is impractical or impossible. Additionally, existing oil and gas facilities may require future expansion, upgrade or modification. Prohibiting siting facilities within ½ mile of waterways will greatly limit growth ability. Suggest ADNRC further define “facilities” and provide that setbacks not apply to improvements needed for existing infrastructure (eg TAPS) or for facilities necessary for further oil and gas	It is not the intent of the plan to require relocation of existing infrastructure that may be currently located within the setbacks imposed in this plan. However, the State has the authority to approve, limit or prohibit expansion of existing infrastructure if it is in the public interest.	None

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	development. At the very least, Guideline A-2 should allow for waivers to this prohibition, especially when existing infrastructure has previously been permitted in the “prohibited” area.		
p. 2-62, lines 4-7 Guideline A-2	OHWL is an unreliable indicator for measurement. Multiple definitions in federal and state regs and statutes exist for OHWL, the interpretation of which are routinely litigated. OHWL is subject to change from year-to-year depending on a number of environmental factors. Using OHWL as standard unit for land designations in the plan is undesirable.	OHWL is the standard used statewide for measuring distance from waterbodies, AS 41.17.950(14).	None
p. 2-62, lines 4-7 Guideline A-2	The Atigun River corridor is an area of exceptional scenic value which should be protected in accordance with Recreation, Tourism, and Scenery guidelines (page 2-41, guideline A-4a). Also clarify that siting of facilities is prohibited within ½ mile of the Staines River. By definition, the Staines River is included as part of Canning River (page 2- 66).	Atigun River is not within an oil and gas lease area so would not likely have facilities located near it.	None
p. 2-62, lines 24-26 Objective B. Community Transportation	“Emergency response” and “access for oil and gas infrastructure” should be added to the list of needs to be accommodated and balanced in this objective.	The existing language adequately covers these needs.	None
p. 2-63, lines 4-6 Guideline C-2	The words “all” and “should” together are overly restrictive for permitting and managing the variety of facilities and infrastructure on state land, where safety and wildlife passage should be paramount. Moreover, Guideline C-2 is in apparent conflict with NSB requirements to separate roads and pipelines to diminish the potential visual impact for caribou. Suggest ADNRC change sentence to read, “If practicable, to minimize the area of land disturbance, new pipelines and other types of linear infrastructure should be co-located if able to meet accepted industry safety standards, and	The use of the word “should” allows for some discretion in siting facilities, which would undergo review and approval on a case by case basis. This plan addresses state land in the planning area, North Slope Borough standards would apply to municipal land within the planning area.	None

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	specifications to not impede fish and wildlife movements.” The guideline should be worded to recognize the critical importance of safety in the decision whether or not to collocate linear infrastructure.	The State has the authority to approve, limit or prohibit placement and siting of infrastructure if it is in the public interest.	
p. 2-63, lines 19-26 Objective D. DR&R Guidelines D-1&D-2	Unrestricted use standards are not necessary or appropriate for “all sites undergoing DR&R on state lands.” Future unrestricted land use in the current industrial areas of the Slope is unrealistic and, in many cases, would impose an inappropriate dedication of resources to an objective that would serve little or no practical public purpose. The phrase “Relatively few parcels are suitable for possible residential development...” appears in the plan at page 2-43, line 26. This statement confirms that not all land should be managed for future unrestricted use. It is paramount that practical future uses drive decisions. The State’s policy should be more flexible, allow for more site-specific consideration, and allow for input from stakeholders at the time and place that remediation standards need to be decided. Unrestricted use is not always appropriate as stated throughout the plan and should not be the standard for all lands. Economic impracticability should also be considered. Again, it is unclear which state agency/division/program has ultimate say as to when the goal is met. Therefore, the phrase “unrestricted use standards” in reference to contamination management should be removed from the plan. Elsewhere in the plan the establishment of DR&R requirements is described as collaborative. Guideline D-1 establishes a requirement that, “except when technically impracticable, all sites undergoing DR&R on state land should be remediated to unrestricted use standards.” This	These general guidelines will apply to current DR&R efforts, and future planning efforts will provide more specific requirements and guidelines. Until the Department undertakes a separate DR&R planning effort, the guidelines in this area plan would apply until superseded by another plan.	DR&R language on page 4-11 will be stricken.

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	guideline and the plan should be modified to reflect that requirements should be established using a collaborative process. DR&R planning measures will be captured in the eventual DR&R Plan mentioned on page 4-11 and components of the plan shouldn't be pre-determined here. The terms "technically impracticable" and "unrestricted use standards" are not defined in the document. These terms have been the subject of discussion with USEPA and their meanings have not yet been resolved. Their inclusion as standards to be met is premature.		
p. 2-63, lines 30-34 Definitions	Relevant to this text, the NSAP does not define contamination or identify the agency who will determine the definition. Further, it should be noted in the plan that some contamination naturally attenuates over time and may not pose hazards to the local human population or ecosystem.	Noted	Definition of contamination has been added to glossary, as follows: The Environmental Protection Agency (EPA) defines contaminants as "any physical, chemical, biological, or radiological substance found in air, water, soil or biological matter that has a harmful effect on plants or animals; harmful or hazardous matter introduced into the environment." Contamination is regulated by numerous state and federal regulations.
p. 2-63, lines 30-34 DR&R Guideline E-1	USEPA region 10 should be included as part of the agency coordination effort. DMLW should not be designated as the lead authority for determining cleanup standards when USEPA and ADEC are the lead agencies for this.	ADEC determines if/when state standards regarding contamination are met, ADNR determines if state standards for condition of land are met. Plan would not alter these authorities. Both ADNR and ADEC follow federal regulations.	Reword Guideline E-1 as follows: "ADNR has the lead responsibility for determining cleanup standards and the approval of cleanup plans on state land before permittees or lessees are released from further liability. ADNR will

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			coordinate clean-up requirements with AOGCC and ADEC. This includes inactive reserve pits, contaminated sites, and hazardous releases to state land."
p. 2-63, line 35 DR&R Guideline E-2	ADEC is not included in Guideline E-2. Uncertain if the omission was intentional. On its face, Guideline E-2 suggests that DMLW is taking over ADEC authority/responsibility regarding contamination management, without any relief to the regulated community from ADEC requirements. It is difficult to determine what the result of this will be, especially when ADEC and DMLW do not agree. Are ADEC regulations and their management necessary if DMLW requires "no contamination" and "unrestricted use" be obtained on all state lands? The plan needs to clarify how DR&R implementation incorporates past, present, and future decisions made by ADEC divisions, such as Spill Prevention and Response (SPAR) and Environmental Health, to ensure the regulated community can adequately and practicably meet the state's requirements. For example, it is unclear if ADEC SPAR will remain the regulatory agency for contamination response and remediation on state lands and if ADEC Division of Environmental Health (Solid Waste Program) will retain final say regarding landfills or if ADNR will have final say when contamination response/remediation or a landfill occurs on land that may at some point be conveyed to another entity. If the NSAP is effective for 20 years, as stated in the proposal, and no reasonable conveyance is anticipated but could occur, which state department/division/program has	Noted The plan is meant to guide ADNR adjudicators and is not intended to delineate ADEC authorities. ADEC determines if/when state standards regarding contamination are met, ADNR determines if state standards for condition of land are met. Plan would not alter these authorities.	Reword Guideline E-2 as follows: "AOGCC, ADNR and ADEC shall consult to determine if proposed DR&R of a facility or site is appropriate and if so, what coordination and timeframe within which it is appropriate for DR&R to occur."

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	final ruling on cleanup levels, monitoring requirements, institutional controls, etc.		
p. 2-65 through 2-67 Water Resource Section	The plan fails to account for or list industry's need to access water for operations. Industry uses water to create ice roads, for drilling operations, for enhanced oil recovery, for potable water, and for a variety of other uses. The state should maintain its access to water resources, or the plan should provide for industry's needs.	See Goal on p. 2-67 lines 31-33, Water Dependent and Water Related Uses. This includes industry uses.	None
p. 2-67, lines 3-8 Ice road challenges under Water Resources	The statement that use of ice infrastructure can be problematic and challenging for water resource management is not supported by facts or evidence that water resources are challenged or impacted. Water resources used for ice infrastructure are strictly managed under permits authorizations for water withdrawal and fish habitat activity. Ice infrastructure melts in the springtime and water sources are generally "recharged," causing minor impact. Moreover, the statement "the driest time of year" should be removed or supported by reference to factual or scientific study to indicate real impact to water resources from ice infrastructure.	The State has sole authority to authorize water use for ice road construction on state land based on appropriate seasonal windows and scientific studies.	Strike the words "to the driest time of year" from line 7, page 2-67.

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CHAPTER 3 – LAND MANAGEMENT POLICIES FOR EACH MANAGEMENT UNIT

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Chapter 3 General	Where appropriate, USFWS should be added as the appropriate contact (e.g., contact with polar bears or walrus)	Concur	Change as suggested
Chapter 3 General	Use complete river and place names	Concur	Change as suggested
Central Slope and Brooks Foothills Region	TAPS spill containment sites are located in Units B-11 and B-12. A TAPS communication site is located in B-06 (southeast corner) and perhaps C-11 (on private property).	Noted	Add to resources and uses in table on pages 3-77-78, and page 3-61
Chapter 3 Ha and Rd designations	Regarding the designation for units, some of the units (such as C-01, C-03, and C-13, among others) designated as Habitat or Recreation include areas of active oil and gas leases, where exploration actively occurs, and where further exploration and development activities are reasonably likely to occur. Many of the units designated are very large areas. Based on Guideline B-4d, designation of these areas as Ha and Rd may preclude future activities unnecessarily and prematurely. DMLW should include the same language it uses in other unit designations; i.e., "oil and gas leasing/development may occur however must consider potential impacts on the habitat harvest values and include general mitigation measures that will avoid, minimize, and mitigate any potential negative effects." Additionally, as evidenced by the active oil and gas leases, interest, and activity in these areas, the designation of Oil and Gas (Og) may be more appropriate based on the text: "Areas where known oil and gas resources exist and where development is occurring, or is	It is not the intent of the plan to preclude oil and gas activities in areas with Ha designation. A land use designation recognizes uses or resources that are of major importance within a management unit but does not preclude other uses. However, ADNR will add Og designations where known oil and gas infrastructure or activities take place, as appropriate.	For consistency, add the following language to management intent in all units within oil and gas lease sale areas or with existing oil and gas infrastructure and/or activity: "oil and gas leasing/development may occur however must consider potential impacts on the habitat harvest values and include general mitigation measures that will avoid, minimize, and mitigate any potential negative effects." Also add Oil and Gas designation throughout the plan, as appropriate.

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	reasonably likely to occur, or where there is a reason to believe that commercial quantities of oil and gas exist are designated Oil and Gas” (page 3-6). Ultimately, given the term of this plan and the size of many of the units, OSA recommends clarifying that unit designations will not preclude oil and gas activity that is permissible under the State’s Best Interest Finding and complies with relevant DOG mitigation measures. In addition, OSA recommends revising B-4d to allow for multiple use of such areas.		
Chapter 3 Maps	Commenter requests exclusion of federal lands in all maps and claims that the northern portion of the boundary between state land and the Arctic National Wildlife Refuge is incorrect.	The State has asserted ownership of land along the northern portion of the Arctic National Wildlife Refuge boundary which has been depicted as federal land in some publications. The State appealed a 2016 BLM decision to deny this assertion and has not exhausted its administrative remedies in this case.	None
Chapter 3 General - designations	A land use designation recognizes uses or resources that are of major importance within a unit. This section defines direction of potential use of each specific Unit, creating a rank that might not be fairly distributed or that has been previously negotiated in other contracts.	Designations are multiple use in nature. All current, valid authorizations are not subject to reclassification. Further, the designations listed at pages 3-5 to 3-9 are listed alphabetically, not by rank. If a unit has multiple designations, there is no preferred use between the co-designations.	None
Chapter 3 Arctic Tidelands Region Climate Change	Authorizations, normally issued for long-term uses, may require additional mitigation for climate change related impacts on polar bears, migratory waterfowl, and estuarine areas during spawning periods and for protection of water quality. We suggest ADNRR form a working group of stakeholders, including the Service, to proactively develop measures to mitigate the effects of sea level rise on the Tidelands Region, including changes to infrastructure and fish and wildlife habitats. In addition, to protect infrastructure from sea level rise along the Chukchi and Beaufort	Concur	None

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	seas coasts the Service suggests minimizing construction of new infrastructure along the southern edge of the Tidelines Region.		
Chapter 3 Arctic Coast Region Climate Change	Sea-level rise will inundate the northern edge of the Arctic Coastal Region. Therefore, we also suggest minimizing construction of coastal infrastructure to the extent practicable to maintain a natural tideline despite sea-level rise. recommend considering the predicted 20-year sea-level rise when constructing new infrastructure along the Arctic Coast. Because the Delta is important to migratory birds, strongly recommend minimizing future development within and adjacent to the [Colville] Delta. In addition, oil and gas infrastructure on the Delta may be adversely impacted by climate-induced sea level rise and diminished winter sea ice, likely allowing larger storm surges, resulting in flooding and erosion within the outer Delta in winter. Increased late summer and fall storm events in the Brooks Range also may result in downriver impacts including erosion and damage to habitats and infrastructure.	Detailed siting considerations would be addressed during adjudication of authorizations for placement and siting of facilities. However, it is appropriate to add guidelines to the plan regarding placement of facilities in coastal areas.	Add guidelines in chapter 2, under Transportation & Infrastructure section Objective C, and under Subsurface Resources Objective B, as follows: "To avoid potential relocation costs due to climate change induced sea-level rise and diminished winter sea ice, minimize placement of infrastructure in coastal areas susceptible to sea-level rise, to the extent practicable." Add USFWS consultation for presence of polar bears to management intent in RAT on page 3-34.
p. 3-6 lines, 16-26 Og designation definition	AOGA supports the State retaining OG designated lands and is also supportive of the possible conveyance to the NSB. AOGA emphasizes that conveyances are subject to valid existing rights and should be considered only with the full consultation of potentially affected lessees.	Concur	None
p. 3-9, line 5 Tc Description	Replace word "may" with "will" in keeping with the Designation title and primary use. Spill preparedness and training activities, including permitted containment sites, should be added to the list of activities.	Since authorizations must be adjudicated before a decision is rendered, it is appropriate to state that the uses or activities listed "may" be authorized if they are in the public interest. The list on page 3-9,	None

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		line 5 is not intended to be a comprehensive list of possible authorizations.	
p. 3-17, line 4-6	1. How is the width of the Arctic Tidelands Region (T) area measured? 2. Is sea-level rise accounted for over time or is a lat/long permanent boundary going to be used? There will be a discrepancy between year 1 and year 10 location if the southern and northern boundaries move as sea-level rise and shorelines move. Taking into account sea-level rise, do previously designated adjacent “uplands” become tidelands? Does the northern terminus of 3-mile nautical limit move south?	1. The width of the Arctic Tidelands Region (T) differs in subtle ways, depending on whether the boundary of the NPR-A or ANWR is involved. The 3 nautical miles was measured from the US Baseline, which is based on mapping of the MLLW (Mean Lower Low Water) line. But in most cases the State owns up to the MHW (Mean High Water) line. The seaward boundary, or 3-nm line, was fixed by the US Supreme Court, under 84 Original, at UTM (NAD83) Coordinates. This line does not change position. 2. There is no agreement that fixed location for the landward boundary of this area, so it does change with erosion and accretion. When land erodes, the State asserts its ownership to the tidelands. This is normal for ambulatory boundaries, whether riparian or littoral, as in this case. The boundary is the MHW line except that ANWR and NPR-A both enclose some areas of tidelands because the description of their boundaries was more expansive to include some bays, inlets and, in the case of ANWR, some tideland areas landward of barrier islands within 3 miles of the main shoreline. Since the Area Plan does not include planning for Oil & Gas, it is not necessary to mention that there are informal agreements between the State and federal agencies on Oil and Gas lease boundaries to avoid conflicts with lessees over charging taxes for the same lands. There is not much mutual practical value on fixing the boundary for this area, outside of subsurface rights, because the existing shore provides a natural monument and a change in interests for surface management.	None

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p. 3-20, Unit T-02 p. 3-21, Unit T-03 p. 3-23, Unit T-06 p. 3-24, Unit T-08 p. 3-26, Unit T-11 p. 3-26, Unit T-12 p. 3-27, Unit T-14 Management Intent	Commenter requests addition of language to allow for conversion to conveyable classification for NSB municipal selections, or for language to be changed to indicate land in unit is available for municipal selection.	AS 29.65 Municipal Entitlement Act applies to uplands only. Municipal tideland conveyances are governed under AS 38.05.825, which has different standards than AS 29.65.	None
p. 3-22, Unit T-05 Prudhoe Bay Coast	The following sentence should be added to the Resources and Uses of T-05/Prudhoe Bay, “Authorizations for various activities including, but not limited to, ice road construction, tundra travel, scientific research, and oil and gas exploration have occurred in the unit” should be added in the Resources and Uses column of T-05/Prudhoe Bay Coast. T-05/Prudhoe Bay should also allow for ice roads and snow roads, when needed, to connect Northstar Island, Oooguruk Drillsite, and Spy Island Drillsite to the gravel road system in Prudhoe Bay during winter.	The management intent states that lands in this unit are available for lease, permit, or other less-than-fee disposal, which covers the uses and activities mentioned in this comment.	None
p. 3-23, Unit T-06 Oliktok Point	Update known oil and gas infrastructure and development for this unit. In addition to the listed facilities, existing tidal infrastructure includes two seasonal barge docks (operated by ENi) and a community boat ramp.	Noted	Add infrastructure to Resources and Uses as requested. Strike “Due to the small size of this unit and potential for community needs, oil and gas development should not be authorized” from management intent.
p. 3-24, Unit T-08 West Dock	Oil and gas development are currently occurring at west Dock and will continue to occur for the near future. West Dock is the primary sea access point	ADNR concurs that there is known oil and gas activity within this unit.	Strike “Due to the small size of this unit and potential for community needs, oil and gas development should not be

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More information on known uses and resources	for the central North Slope and has existing oil and gas development wells. Suggest this language be rewritten to say, “These lands shall be retained in state ownership to provide continuity in existing marine transportation operations, and for future projects consistent with public and industrial needs.” Oil and gas development currently occurs within T-08; PM2 (96 wells including 50 currently operable wells and side tracks, and plugged/shut in/abandoned wells; manifold buildings, pig launching module and fuel storage), STP (seawater treatment plant), and along the causeway (pipelines for water, oil, miscible injection and gas). The oil spill response cooperative, Alaska Clean Seas, has permanent mooring facilities at West Dock. Additionally, facility leasing occurs on West Dock for seasonal oil and gas operations and development support for other operators.		authorized” from management intent. Add known infrastructure to Resources and Uses.
p. 3-25, Unit T-10 Endicott	The correct term for the lease unit encompassing MPI, SDI, and the Endicott Causeway is “Duck Island Unit.” Recommend changing the headline to “Duck Island Unit.” The stated “Resources and Uses” for T-10/Endicott (Duck Island Unit) should be edited to clarify that no development has currently occurred at the Liberty development. The plan should be amended to read, “The Liberty development is located east of Prudhoe Bay and encompasses the tide and submerged lands around the Endicott Causeway and Manmade Islands. Development occurs on the manmade islands within the Duck Island Unit. A Liberty	Will reference duck island unit but will not change the title of plan unit to match the lease unit. Concur with change to clarify that no development has occurred at Liberty. Opening sentence refers to uses, not values.	Add language “includes Duck Island Lease unit” Add clarifying language regarding Liberty, as suggested.

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	easement and gravel expansion exists at the eastern portion of the Satellite Drilling Island.” Extensive oil and gas infrastructure currently exist on the Endicott Causeway and artificial islands, including oil wells, processing facilities, power generation, camp, etc. Suggest adding “Oil and gas resource values” to the list of items in the management intent column of the table. The text should be edited to say, “Unit is to be managed primarily to accommodate oil and gas resource values, commercial, industrial and related uses...”		
p. 3-31, lines 40-43 Arctic Coast Region Access, Resources, and Uses of State Land	The airstrip is an asphalt airstrip, not gravel.	Concur	Change as recommended
p. 3-35, Unit A-02 Colville River Delta Resources and Uses	Alpine ROW needs to be added.	Commenter does not specify what type of ROW should be added, whether it is a road, pipeline or utility ROW. ADLs 415932 and 415701 are listed, these are Alpine pipeline ROWs. ADL 415857 is also listed, which is an Alpine utility easement.	None
p. 3-36, Unit A-03 p. 3-37, Unit A-04 p. 3-38, Unit A-05 Resources and Uses	Commenter requests addition of language to allow for conversion to conveyable classification for municipal selections, and for language to be changed to indicate land in unit is available for municipal selection.	These are large units, and subunits have been created within these units where municipal selections or potential selections have been identified. The State intends to retain the land in these larger units to provide continued support and material resources for industry needs and communities across the North Slope, while making most of the subunits available for municipal selection.	None

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p. 3-37, Unit A-04 p. 3-38, Unit A-05 Resources and Uses	Add the sentence “Authorizations for various activities including, but not limited to, ice road construction, tundra travel, scientific research, and oil and gas exploration have occurred in the unit”	The management intent language and resources and uses already listed for these units sufficiently cover the uses and activities mentioned in this comment.	None
p. 3-38, Unit A-05 Prudhoe Bay	Tarmac Camp/Runway/PBOC (ADL 42749 Tract A-1), the southern portion of Put 23 (ADL 402774 and ADLS 820128), and East Dock (ADL 42749 Tract A-2) are also on Fee Simple (private land) so these should also be mentioned if PS01 is mentioned.	Noted	Remove reference to PS01 being on private land.
p. 3-42, Unit A-10 Put 23 Boundaries on map	The boundaries on the map do not correspond to the text description in A-10. The map boundaries appear to be the southern portion of Put 23 and the lands to the southeast (not northeast) of the pit (although the resolution is not good enough to be able to tell). The southern portion of the pit is the lands selected/conveyed to NSB, not the state-owned portion of Put 23. Either the boundaries of A-10 on the map or the accompanying text needs to be corrected.	Noted. In a decision to convey land to NSB dated 11/26/2010, the state postponed action on a portion of the land in the northern half of Put 23, to be considered in a future decision. This will be noted in the Resources and Uses for Unit A-10 on page 3-42.	Correct map 3-2 to properly label units. Note presence of land in northern portion of Put 23 on which the state postponed action in a 2010 municipal conveyance decision.
p. 3-42, Unit A-10 Put 23 Stylistic Change	“Lands within the proposed AKLNG...” is not a complete sentence. Propose it be rewritten as, “Lands within the proposed AKLNG Right-of-Way and other lands with infrastructure that are critical for oil and gas development, maintenance, operations, or to provide material resources for development and infrastructure shall be retained in state ownership.”	Noted	Management Intent: Fix typo: “managed to provide” stated twice in first sentence. Change “is” to “are” in 2 nd paragraph Change as suggested
p. 3-44, Unit A-13 Deadhorse Airport Management Intent	Add converter language to allow for conversion to conveyable classification for NSB municipal selections.	Deadhorse Airport is currently managed by ADOT/PF through an Interagency Land Management Agreement (ILMA). ADOT/PF has indicated it will not relinquish management of the Deadhorse Airport.	None

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p. 3-49, Unit A-21 Endicott Road Management Intent	The two stated intents for Endicott Road appear to be the same but are worded differently. ADNOR should clarify this discrepancy.	Concur	Reword first instance as follows: "Lands within the proposed AKLNG ROW and other lands with infrastructure that are critical for oil and gas development, maintenance or operations not approved for conveyance shall be retained in state ownership." Strike second instance at top of p. 3-50.
p. 3-50, Unit A-23 p. 3-92, Unit D-08 p. 3-93, Unit D-11 p. 3-93, Unit D-12 Management Intent	Commenter requests addition of language to allow for conversion to conveyable classification for municipal selections, and for language to be changed to indicate land in unit is available for municipal selection.	The state intends to retain the land in these units to provide continued support and material resources for industry needs and communities across the North Slope.	None
p. 3-56, Unit C-01 Management Intent	Commenter requests addition of language to allow for conversion to conveyable classification for municipal selections, and for language to be changed to indicate land in unit is available for municipal selection.	Several units were created immediately to the north and to the south of Unit C-01, where municipal selections or potential selections have been identified. The State intends to retain the land in unit C-01 to provide continued opportunities for subsistence, hunting, fishing, material sales, among other beneficial uses, while making land in the surrounding units available for municipal selection.	None
p. 3-57, Unit C-03 Management Intent	Commenter requests addition of language to allow for conversion to conveyable classification for municipal selections, or for language to be changed to indicate land in unit is available for municipal selection.	This unit is comprised of state shorelands that cannot be conveyed out of state ownership, which leaves very limited acreage available to convey.	None
p. 3-66, Unit C-21 p. 3-81, Unit B-20 p. 3-81, Unit B-21 p. 3-81, Unit B-22 p. 3-105, Unit H-02	Request the requirement that land in these units are to be retained in state ownership be removed, to allow for municipal selection.	These areas are intended to support the state's land disposal program and thus are not available for municipal entitlement selection.	None

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Management Intent			
p. 3-69, Map 3-3 Redesignation Request	Unit C-13 (shown on Map 3-3) is designated “Ha.” Eni has oil and gas leases in the northern area of Unit C-13. The description of the designation of Oil and Gas (Og) on page 3-6 states, “Areas where known oil and gas resources exist and where development is occurring, or is reasonably likely to occur, or where there is a reason to believe that commercial quantities of oil and gas exist are designated Oil and Gas.” The designation of Habitat (Ha) on page 3-5 does not mention oil and gas exploration/production, only linear infrastructure projects. The state leased a portion of the land within the unit for oil and gas. Therefore, it is reasonable to infer that commercial quantities of oil and gas exist in that unit. The designation for the leased portions of the unit should reflect the same.	Ha designation does not preclude OG activity. Management intent for unit C-13 allows for oil and gas leasing/development.	None
p. 3-78, Unit B-14 Management Intent	Commenter requests addition of language to allow for conversion to conveyable classification for municipal selections, or for language to be changed to indicate land in unit is available for municipal selection.	This unit has a Rm designation which converts to a conveyable classification, so additional language to allow municipal selection is not necessary.	None
p. 3-86 Dalton Corridor Resources and Uses	Although it is obvious, TAPS, particularly its fuel gas line which fronts the highway for 100 miles, should be included among the uses.	Concur	Include TAPS in Resources and Uses.
p. 3-88, Unit D-01	Resources and Uses: The TAPS Lease and Grant together span the unit. Undeveloped gravel and other aggregate reserves or even existing sites not included in Unit D-12 should be added as a	TAPS fuel gas line is included as part of the TAPS lease.	Add reference to gravel resources in Resource and Uses.

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	significant resource. The TAPS fuel gas line should be included. Management Intent, 3rd from last paragraph, following the sentence, “Maintain opportunities for subsistence, and other beneficial uses.”: Add a qualifying phrase that such maintenance is implemented in a manner that does not interfere with pipeline and highway operations.	This proposed language is covered in the management intent for this unit. Pipeline and highway maintenance and operations are allowed throughout this unit.	
p. 3-89, Unit D-02	A TAPS communication site may also be located in the unit which is near the highway on high ground in the Dietrich River Valley. One of the three D-2 labels on the Unit map appears to be at Slope Mountain near the Toolik River headwaters, and not near the Dietrich. There is a TAPS communication site on the easterly side of the mountain top.	The unit is mostly located at Dietrich, with one outlier.	Add reference to TAPS communication sites that may be within the unit in Resources and Uses.
p.3-90, Unit D-04	TAPS should be included, and “Tc” should be added to Designation/s. Defining or renaming the “Dalton Highway Transportation Corridor” would make the reference consistent with the Unit Chapter. Management Intent: The first sentence should be deleted because it conflicts with the second which is more consistent with the Unit values and planning objectives.	This unit has special values reflected in the three co-designations. Regarding management intent, the first sentence describes management to protect the unit’s special values, the second sentence describes uses and priorities.	Add reference to TAPS in Resources and Uses.
p. 3-90, Unit D-05	TAPS fuel gas line and material site 119-4 should be included and “Ma” should be added to Designations.	While a material site exists in this unit, the unit has not been identified as a priority for future material sites, which was the criteria used for Ma designation.	Include reference to TAPS infrastructure in Resources and Uses
p. 3-91, Unit D-06 Management Intent	Commenter requests addition of language to allow for conversion to conveyable classification for municipal selections, or for language to be changed to indicate land in unit is available for municipal selection.	The requested language has already been included in the management intent for this unit.	None

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p. 3-91, Unit D-07	Gravel materials should be included. The Sagavanirktok in particular has vast gravel reserves some of which are accessible, and which were a significant source in the highway and pipeline construction as well as for operations and maintenance. "Tc" should be added to designations.	Concur. Current designation(s) does not preclude pipeline maintenance, construction, and operations and management intent provides guidance for those operations.	Resources and Uses: Unit is used for gravel and material extraction. There is potential for further development of these resources. Management Intent: Manage unit for its materials values and resources consistent with the authorization issued by ADNDR.
p. 3-92, Unit D-08	The unit may not have any state-owned lands. Airport support should be included.	The plan provides management intent for selected and top filed lands in anticipation of the state receiving title to some or all of these lands. The plan guidance would attach at the time the land is conveyed to the state.	None
p. 3-92, Unit D-09	TAPS should be included in the last sentence.	Concur	Mention TAPS in Resources and Uses.
p. 3-93, Unit D-11	TAPS fuel gas line should be included.	Unit is within D-12, which already includes reference to TAPS	None
p. 3-93, Unit D-12	TAPS and its fuel gas line should be included, and "Tc" should be added to designations	TAPS is currently referenced in Resources and Uses. TAPS operations covered in management intent, "...and other lands with infrastructure that is critical for oil and gas development, maintenance, or operations shall be retained in state ownership."	None
p. 3-95, Unit D-16	The fuel gas line should be included, and "Tc" should be added to designations.	Noted	Change as suggested.
p. 3-96, Unit D-17	The fuel gas line should be included, and "Tc" should be added to designations.	"Tc" is already a designation for this unit.	Note presence of TAPS fuel gas line in Resources and Uses.

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APPENDICES

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General on Glossary	“sensitive habitat” and “sensitive environmental features” are used in numerous places in the plan but are not defined. Additionally, it is not clear which agency is tasked with determining whether a wetland or other habitat is “sensitive.” This needs to be clarified in the plan in order to avoid confusion and misinterpretation.	There is no legal definition, however ADF&G or USFWS could identify a wetland as sensitive based on its importance to the species over which each particular agency has management authority.	None