

**Copper River Basin Area Plan
Issue Response Summary**

#	Subject	Issue Summary	Response	Recommended Revision
1	Classification/ Agricultural	Requesting additional Agricultural lands within the planning area to support developing the Agricultural industry in the region. Some units suggested include, but are not limited to, H-13, H-50, H-51A, H-54, H-57 (proposed agriculture only); portions of H-13, H-21-23, H-25, H-37, H-41, H-51B, and H-55 (proposed agriculture and settlement).	Concur in part. Under AS 38.04.050 and 11 AAC 51.015, prior to selling, leasing, or otherwise disposing of the land estate, DNR must survey land, provide legal access to private land, and reserve public use easements. A right-of-way or easement shall be located to assure adequate and feasible access for the purposes for which the right-of-way or easement was intended. Section line or other easements should not be relied on for access without field inspection of the practicality of such routes. Based on soils data and the parcel's proximity to the Edgerton Highway and the community of Kenny Lake, unit H-50 was reconfigured to include a portion of unit H-51A and unit H-51B. Unit H-13 is a series of emerged islands along the Copper River and are not appropriate for disposal due to lack of access. Unit H-21 includes the Copper Basin Sanitation Services facility on the eastern portion and is more appropriate for commercial and industrial development to consolidate community services. Land classified settlement is available for agricultural development. Unit H-23 is entirely top-filled, straddles the Trans-Alaska Pipeline (TAPS), and lacks access. Unit H-25 contains the	<i>Unit H-22 – Reconfigure unit and change Designation from:</i> H-22 Se (Settlement) <i>to:</i> H-22 Ag (Agricultural) <i>Replace existing text in Management Intent with language similar to:</i> Unit is to be managed for agricultural purposes. Disposals should consider the impact of agricultural use upon wetlands and subsistence activities. <i>Unit H-50 – Reconfigure unit</i> <i>Replace existing text in Management Intent with language similar to:</i> Unit is to be managed for agricultural purposes. Disposals should consider the impact of agricultural use upon wetlands and subsistence activities. See the Agriculture and Shorelands and Stream Corridors sections in Chapter 2 for more information. <i>Change text in Resources and Uses from:</i> Brown bear are distributed throughout the unit with moose present in winter concentrations. <i>to the following or similar:</i>

#	Subject	Issue Summary	Response	Recommended Revision
			Gulkana Airport and is to be managed consistent with FAA and DOT/PF operational requirements. It is not appropriate or available for disposal. Unit H-37 is split by TAPS in the northern, central and southern portions of the unit and the Tazlina River runs through the northern portion of the unit. Lack of access makes this unit inappropriate for disposal. Unit H-41 is on the east side of the Copper River and lacks access.	Moose winter in the northern portions of the unit. <i>Remove 3-5.5, add 3-5.6 in Map(s)</i> <i>Unit H-51A – Reconfigure unit: Replace existing text in Management Intent with language similar to:</i> Land disposals are appropriate during the planning period. Disposals should conform to the requirements set out in Chapter 2, specifically the Settlement and Shorelands and Stream Corridors sections. <i>Replace existing text in Resources and Uses with language similar to:</i> Authorizations that may impact RS 2477 routes should ensure access is maintained. <i>Remove 3-5.5, add 3-5.6 in Map(s)</i> <i>H-51B – Reconfigure unit and change designation from:</i> H-51B Se, Ag (Settlement, Agriculture) to: H-51B Ag, Se (Agriculture, Settlement) <i>Replace existing text in Management Intent with the following:</i> Manage primarily for agricultural purposes. If land within the unit is determined through further field inspection to not be appropriate for agricultural use, other land disposals may occur and the Ag designation is extinguished

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				and replaced by the Se designation without the need for a formal plan amendment. See the Agriculture and Settlement sections in Chapter 2 for more information. Authorizations that may impact RS 2477 routes should ensure access is maintained. <i>Remove 3-5.5, add 3-5.6 in Map(s)</i>
2	Classification/ Agricultural	Agriculture development in the Copper Basin does not generate a benefit to the State of Alaska. Wetlands should not be designated as Agricultural lands. They are a natural carbon sink that loses its function when cleared for Agricultural development. Mile 93 of the Richardson Highway is an example. Do not resell previously sold/granted Agricultural settlements.	Under AS 38.04.005, DNR is required to identify and make land available for private use. Part of this process includes identifying sensitive areas that should be taken into consideration during siting. Further guidance on such issues is provided in the Resource Allocation Table in Chapter 3. The importance of identifying land that is appropriate for agricultural purposes is reflected in the goals identified in Chapter 2. This includes providing a reserve of land for agricultural use to support the local and regional production of foodstuffs necessary to support the citizens of Alaska in the future. Land classified for agricultural use is subject to multiple restrictions under AS 38.05.321.	None.
3	Carbon	I believe the sale of carbon-offset credits is now a recognized source of income from State land. Please do not allow the sale of carbon-offset	In 2023, legislation was enacted allowing the State to use its lands and natural resources for carbon management projects, including through the Carbon Offset Program authorized under	None.

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		credits in areas W-16 and W-17 when you update the plan. These areas are the only larger sections of land in the McCarthy area which can be utilized for commercial timber harvesting, gravel sales, land sales, and other industrial type uses.	AS 38.95.400 – AS 38.95.499. Classification does not preclude multiple purpose use of land whenever different uses are compatible. Projects proposed under the Carbon Offset Program are adjudicated through a separate and subsequent administrative process.	
4	Carbon	It came to my attention that the State is considering Carbon Management and Monetization program as part of the land management options for the future. This program is in alignment with the values and purposes of Wrangell-St. Elias National Park and Preserve and I encourage you to consider this opportunity and provide more information about the programs in your plan.	Concur.	<i>On Page 2-28, line 24, insert:</i> K. Carbon. In 2023, legislation was enacted allowing the State to use its lands and natural resources for carbon management projects. The legislation authorized two programs within DNR: the Carbon Offset Program and Carbon Management Leasing. The Carbon Offset Program enables the State to implement carbon offset projects on State land. Authorized under AS 38.95.400 – AS 38.95.499, these State-led projects generate revenue through carbon offset credits while providing other environmental, social, and economic co-benefits and an opportunity for businesses to meet voluntary carbon-reduction targets. The Carbon Management Leasing program allows DNR to lease State land to private parties for a carbon management purpose, such as a carbon offset project or other project that mitigates greenhouse gases. Carbon management leases are authorized under AS 38.05.081.

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				<i>“Other Guidelines Affecting Forestry” will become Section L.</i>
5	Classification	Why has there been a large increase in Public Recreation Land and a decrease in Habitat land?	There has only been a 1% decrease in lands classified Wildlife Habitat Land (WHB). The current revision includes more acreage classified as Public Recreation Land (PUR), due in part to a greater use of WHB/PUR co-classifications compared to the 1986 plan.	None.
6	Classification	(Page 3-71 Units H-21 & H-22) Units H-21 and H-22 are not suitable for settlement. Change designations to Public Facilities Retain or other.	Concur in part. Public Facilities-Retain is not an appropriate designation for these units as the classification Reserved Use would limit conveyance to specific entities. In order to encourage consolidation and transfer of waste management and associated facilities to interested entities, the designation of Settlement and additional management guidance promoting commercial and industrial development in unit H-21 is appropriate.	<i>Unit H-21 – Reconfigure unit and change Designation from:</i> H-21 Sc (Settlement-Commercial) <i>to:</i> H-21 Se (Settlement) <i>Replace existing text in Management Intent with language similar to:</i> Unit is to be managed for settlement purposes. Land disposals should promote commercial and industrial development. Development shall exclude wetland areas and conform to the guidelines set out in Chapter 2. <i>Change text in Resources and Uses from:</i> Wildlife habitats [...] and mushrooms. <i>to the following or similar:</i> Brown bears concentrate along river corridors in the spring; caribou winter

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				throughout, and trumpeter swans breed and summer throughout the unit. <i>Remove Sc-Settlement-Commercial and associated definition from designations used in this plan. (Page 3-7, Lines 39-41 and Page 3-8, Lines 1-5)</i> <i>Remove Settlement-Commercial designation from classification-conversion table (Page 4-5, Table 4-2)</i> <i>Unit H-22 – Reconfigure unit and change Designation and Management Intent as described above (Pg. 1)</i> <i>Update the Resource Allocation Table for unit H-22 to reflect the new Designation of Agriculture and Management Intent as appropriate for agricultural purposes.</i> <i>Page 3-72, Create unit with Designation: H-25A Pt (Public Facilities-Transfer)</i> <i>Add row to table after H-25 for unit H-25A</i> <i>Add text in Management Intent with language similar to:</i> Manage for continued use as the Gulkana Shooting Range <i>Add text in Resources and Uses with language similar to:</i> This unit consists of a parcel located 1/3 of a mile west of the Richardson

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				Highway, between mileposts 119 and 120. It is bisected by Dry Creek, which is anadromous. <i>Add the designation and description of Public Facilities-Transfer to pg. 3-5 and pg 4-5.</i>
7	Private Landowners	Remove my property in the SESE, SWSE of C005S014E17 and the SWSW of 005S014E16 for plan changes.	The Copper River Basin Area Plan (CRBAP) is the land use plan for state-owned, state-selected and top-filed lands in the planning area. While the plan does provide plan designations and classifications for units with mixed land ownership, the plan does not apply to private lands.	<i>Remove parcel from Unit W-16 and update Map 3-6.2 on page 3-119 to show this parcel as private land. This parcel is depicted as private land on the plan maps.</i>
8	Land Disposals/ Settlement	The proposed settlement areas are not appropriate. There are access issues and the quality of the land in those areas is not suitable for development. Do not propose any new settlements in or adjacent to non-motorized hunting areas. This would negatively impact wildlife and reduce the area available and opportunities for non-motorized hunting.	In classifying and making state land available for private use and settlement purposes, DNR is directed under AS 38.04.005 to consider the natural resources and conditions present on the land and seek to minimize the adverse effect of private settlement on wildlife, fishery, mineral, timber, and other significant resources of the land. Classification does not authorize land sales. Land disposals are subject to a separate and subsequent administrative process.	None.
9	Technical Correction	The designation of Water Resources is not used in this plan and should be removed	Concur.	<i>Remove the language pertaining to Water Resources on page 3-8, lines 38 through 45 and lines 1 through 7 on page 3-9.</i>

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		from the list of designations used in this plan.		
10	Local Planning	DNR should develop a water management plan for Moose Creek to control the flooding in Glennallen.	The CRBAP is the land use plan for state-owned, state-selected and top-filed lands in the planning area. The plan establishes goals, objectives, management guidelines, and land classifications with management intent that apply to all state lands within the planning area. A flood control plan for a specific resource is beyond the scope of this plan.	None.
11	Classification	In 1986, 14.59% of the area was designated RMG, whereas that number has now risen to 22.04%. Your definition of Resource Management is equivalent to General Use, or no specific “value” found so the land can be used in any way that is in “the best interest of the state.” Why has there been a 7.5% increase in RMG designation, especially when all of the plots are within caribou and/or moose ranges, and should be considered in wildlife management and not left in a vulnerable position for the state to do what they wish?	Land classified resource management includes land that might have a number of important resources, but for which a specific resource allocation decision is not possible because of a lack of adequate resource, economic, or other relevant information; or for which a decision is not necessary because the land is presently inaccessible and remote and development is not likely to occur within the next 10 years. One major change with the plan revision is the expansion of the planning area which added to the already increased total of state-owned acreage by nearly 2 million acres. The Northwest and Chugach Mountains Regions were affected the most, with the highest concentration of land classified Resource Management is within the Chugach Mountains Region. Land within these regions, especially within the Chugach	None.

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			Mountains Region, is remote, unhabitated, with rugged mountain terrain and has extensive glaciers. Development is not likely to occur in these units. Fish and wildlife habitat values are identified throughout the plan, in all the region descriptions, and in more detail in the Resource Allocation Table, regardless of designation. Most units designated Resource Management include language in the Resource Allocation Table directing adjudicators to consult with ADF&G to identify sensitive habitats.	
12	Classification/ Special Use Areas	Expand the Archaeological District by designating additional lands to protect resources on nearby State lands and co-manage the District with the BLM.	The plan provides for the expansion of the Tangle Lakes Archaeological District Special Use Area in unit H-8. The management intent for that unit acknowledges that land within unit H-8 has been recognized as having significant historic and cultural value and has been listed in the National Register of Historic Places since 1971. The entire unit is in selected status. Upon conveyance to the state, this unit is recommended for inclusion in the Tangle Lakes Archaeological District Special Use Area (ADL 228296) and should be retained in state ownership.	None.
13	Classification	Please review the classification for unit O-6. Pairing a public recreation classification with a	Concur. A review of past and current land use justified designating the unit Settlement to facilitate land sales while	<i>Change unit and Designations from:</i> O-6 Se, Rd (Settlement, Public Recreation-Dispersed)

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		settlement classification is confusing and doesn't seem to fit.	addressing the recreation values in the management intent. The designation of Public Recreation-Dispersed was removed from unit O-6. Its sole classification is now set to Settlement Land.	to: O-6 Se (Settlement) <i>Replace existing text in Management Intent to language similar to:</i> Unit is comprised of previous land offerings and homestead parcels known as the Lakes Subdivision. Any future development shall be consistent with the disposal decisions authorizing prior offerings. Development must ensure public access, recreational opportunities, and sensitive habitats are not compromised. Lots identified through the sale process as open space, buffers, or access routes shall be retained. Staking areas or land offerings shall exclude wetland areas. A riparian buffer of at least 100' landward from the ordinary high-water line shall be maintained along anadromous waterbodies. See the Shorelands and Stream Corridors section in Chapter 2 for more information. Adjudicators shall consult with ADF&G to identify sensitive habitat areas prior to issuing an authorization. See the Settlement, Fish and Wildlife Habitat, and Harvest sections in Chapter 2 for additional information.

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				Protect known heritage sites and cultural resources. Authorizations that may impact RS 2477 routes should ensure access is maintained. This unit contains mixed land ownership. <i>Change language in Resources and Uses from:</i> Brown bears are generally distributed throughout the unit. Caribou are found throughout the northern portions of unit, with known calving, rutting, and wintering habitat dispersed throughout. <i>to the following language or similar:</i> Caribou are found throughout the northern portions of unit, with known rutting, and wintering habitat dispersed throughout.
14	Classification	Please review the classification for unit O-9. That area has a lot of habitat resources and the whole unit doesn't need to be available for settlement.	Concur in part. Unit O-9 was classified as Public Recreation Land, Wildlife Habitat Land, and Settlement Land. A review of past and current land use and habitat data indicated it was appropriate to separate unit O-9 into two units, O-9A classified as Settlement Land, and O-9B classified as Public Recreation Land and Wildlife Habitat Land.	<i>Change unit and Designations from:</i> O-9 Rd, Ha, Se (Public Recreation Dispersed, Wildlife Habitat, and Settlement) <i>to:</i> O-9A Se (Settlement) O-9B Rd, Ha (Public Recreation Dispersed and Wildlife Habitat) <i>Remove O-9 row from table, add rows for O-9A and O-9B</i> <i>Add the following or similar for O-9A Management Intent:</i>

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				This unit contains scattered lots from prior land offerings and homesteads. Reoffering of lots included in existing subdivisions or from past land disposal programs that return to state ownership may be reoffered. Lots that were identified through the sale process as public space, buffers, or access routes shall be retained. <i>Add the following or similar for O-9A</i> Resources and Uses: The unit is popular recreational territory used for a variety of adventures and outdoor activities. Varied terrain and habitats with numerous trails facilitate ATV and snowmachine riding, camping, hiking, and hunting. There is road access to the unit via the Lake Louise Road and access throughout the unit is provided by numerous RS 2477 trails and public access easements. Caribou wintering habitat is present throughout. Moose calving and winter use habitat is found primarily in the southern portion of the unit while rutting habitat is scattered throughout. Trumpeter swan breeding and summering habitat occurs throughout as does breeding habitat of migratory landbirds.

#	Subject	Issue Summary	Response	Recommended Revision
				Subsistence gathering of berries, plants, greens, and mushrooms occurs here, as well as hunting for brown and black bear, caribou, moose, migratory waterfowl, upland game birds and other small land mammals. The unit is also a popular area for firewood collection. The Alaska Heritage Resources Survey (AHRS) indicates cultural resources within the unit. Portions of this unit are closed to mineral entry under MCO 324, MCO 308, MCO 338, MCO 511, MCO 154, and MO 1274. <i>Add the following or similar for O-9B</i> Management Intent: Manage for dispersed recreation and to protect habitat, subsistence, and riparian uses. Adjudicators shall consider siting requirements that avoid or minimize impacts to sensitive habitats consistent with the management guidelines set out in Chapter 2. Adjudicators shall consult with ADF&G to identify sensitive habitats prior to issuing an authorization. Protect known heritage sites and cultural resources.

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				Authorizations that may impact RS 2477 routes should ensure access is maintained. This unit contains mixed land ownership. <i>Add the following or similar for O-9B</i> Resources and Uses: The unit is popular recreational territory used for a variety of adventures and outdoor activities. Varied terrain and habitats with numerous trails facilitate ATV and snowmachine riding, camping, hiking, and hunting. There is road access to the unit via the Lake Louise Road and access throughout the unit is provided by numerous RS 2477 trails and public access easements. Caribou wintering habitat is present throughout, with rutting habitat localized in the northern portion of the unit. Moose calving and wintering occurs primarily in the southern portion of the unit while rutting is scattered throughout. Trumpeter swan breeding and summering occurs throughout the unit. Subsistence gathering of berries, plants, greens, and mushrooms occurs here, as well as hunting for brown and black bear, caribou, moose, migratory waterfowl, upland game birds and other small land

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				mammals. The unit is also a popular area for firewood collection. Fishing occurs on the many lakes within the unit. Tolsona creek, and Mendeltna creek are anadromous. Little Tolsona and Mountain Lake are stocked by ADF&G. The Alaska Heritage Resources Survey (AHRS) indicates cultural resources within the unit. Portions of this unit are closed to mineral entry under MCO 308, MCO 511, and MCO 154.
15	Classification	Please review the classification for unit H-37 and consider adding habitat.	Habitat data was reviewed and changes were deemed appropriate based on resources present.	<i>Change unit Designation from:</i> H-37 Rd (Public Recreation Dispersed) <i>to:</i> H-37 Rd, Ha, Hv (Public Recreation-Dispersed, Wildlife Habitat, Harvest) <i>Change Management Intent from existing to language similar to:</i> Manage to protect dispersed recreation and riverine values. Retain in state ownership. Adjudicators shall consider siting requirements that avoid or minimize impacts to sensitive habitats consistent with the management guidelines set out in Chapter 2. Adjudicators shall consult with ADF&G to identify sensitive habitats prior to issuing an authorization.

#	Subject	Issue Summary	Response	Recommended Revision
				Protect known heritage sites and cultural resources.
16	Classification	Please review the classification for unit H-48 and consider designating the area for forest resources.	Resource data was reviewed and identified an area where widespread timber resources were present. Unit H-48A was added and classified and Forest Land.	<i>Create unit with Designation:</i> H-48A F (Forest) <i>Add row to table after H-48 for H-48A</i> <i>Add the following or similar for H-48A Management Intent:</i> Timber harvest is considered appropriate. Adjudicators should consult with ADF&G where timber harvests are to occur as part of the forest land use plan (or similar pre-decisional process). Site-specific guidelines for forestry management activities will be addressed through the Forest Land Use Plan prior to any commercial timber sale or harvest. See Chapter 2 for specific management guidelines, especially those related to Forestry. <i>Add the following or similar for H-48A Resources and Uses:</i> This unit is located on the south side of the Edgerton Highway, approximately two miles east of its junction with the Richardson Highway. Brown bears concentrate in the eastern portion of the unit in the spring. Moose

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				winter and trumpeter swans summer throughout the unit.
17	Classification	Please consider changing the classification for unit H-54 from Reserved Use to Recreation to highlight the importance of access and recreation values in this unit.	A review of designations indicated that a Public Recreation designation is more appropriate than a Reserved Use designation given the importance of protecting access to the river and for other recreational pursuits. H-54 was changed for Reserved Use Land to Public Recreation Land Dispersed.	<i>Change unit Designation from:</i> H-54 Rs (Reserved Use) <i>to:</i> H-54 Rd (Public Recreation Dispersed) <i>Replace existing text in Management Intent with language similar to:</i> Unit is to be managed to protect public access, recreation and scenic values, and riverine resources. Other uses within this unit are considered inappropriate. <i>Remove the following language in Resources and Uses:</i> Moose are distributed throughout the unit.
18	Classification	Please reconsider the classification for units W-2 and W-3. These areas are important habitat areas and provide hunting and subsistence opportunities.	A review of the resource data indicated a shift in habitat and subsistence use that warranted additional protection. Units W-2 and W-3 were changed from Resource Management Land to Public Recreation Land and Wildlife Habitat Land.	<i>Change unit Designations from:</i> W-2 Rm (Resource Management) W-3 Rm (Resource Management) <i>to:</i> W-2 Rd, Ha (Public Recreation-Dispersed, Wildlife Habitat) W-3 Rd, Ha (Public Recreation-Dispersed, Wildlife Habitat) <i>Replace existing language in Management Intent of both units with the following or similar:</i> This unit is to be managed for the protection of habitat, subsistence use, and dispersed recreation.

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				Adjudicators shall consider siting requirements that avoid or minimize impacts to sensitive habitats consistent with the management guidelines set out in Chapter 2. Adjudicators shall consult with ADF&G to identify sensitive habitats prior to issuing an authorization. <i>Remove caribou calving habitat from Resources and Uses of both units.</i> <i>Remove moose habitat from Resources and Uses of W-3.</i>
19	Classification	Please reconsider the classification for unit W-10 and make it Forest land only.	Concur. A review of resource data identified an area where widespread timber resources were present and appropriate for timber harvest.	<i>Change Designations from:</i> W-10 F, Rd (Forest, Public Recreation-Dispersed) <i>to:</i> W-10 F (Forest) <i>Replace existing language in Management Intent with the following or similar:</i> Timber harvest is considered appropriate. Adjudicators should consult with ADF&G where timber harvests are to occur as part of the forest land use plan (or similar pre-decisional process). Site-specific guidelines for forestry management activities will be addressed through the Forest Land Use Plan prior to any commercial timber sale or harvest. See Chapter 2 for specific management

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				guidelines, especially those related to Forestry. Retain in state ownership.
20	Classification	I hope this plan revision can make more meaningful and informative land classifications using data and information already available. The 1986 plan segmented the McCarthy planning block into 4 categorical primary uses the current plan revision proposes to lump all of that into one giant unit, W-16 Settlement, except for two small W-17 units for material sites. The Long Lake shoreline (especially south-facing slopes and nearby undeveloped uplands) or within the Long Lake watershed resources is inappropriate for Settlement. It is estimated that 20% of the Copper River red salmon fishery spawns in Long Lake; from a safety standpoint, it makes no sense to intentionally drop residential development into this mix of salmon and bears. The steep slopes are highly unsuitable and problematic for development.	Concur in part. A review of current and past land uses, and resource data indicated it was appropriate to separate the larger unit into smaller units, W-16A classified as Resource Management Land, and W-16B Settlement Land and W-21 Settlement Land.	<i>Change unit and Designations from:</i> W-16 Se (Settlement) <i>to:</i> W-16A Rm (Resource Management) W-16B Se (Settlement) <i>Remove row for unit W-16, add rows for units W-16A and W-16B.</i> <i>Add the following or similar for W-16A</i> Management Intent: Unit is to be managed for diversity of uses including subsistence activities, recreational opportunities, and timber harvest. <i>Add the following or similar for W-16A Resources and Uses:</i> This unit is the area of the McCarthy community along the Nizina and Chitina rivers. Trumpeter swans use the areas south of McCarthy and along Lakina River as summering habitat. Subsistence activities in the unit include the harvesting of black bear, moose, small land mammals, upland game birds, and non-salmon fish along with the gathering of plants, greens, and mushrooms, berries, and firewood.

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		Keeping W-16 as Settlement would negatively impact fire safety, local wood resource availability, and subsistence hunting and fishing. It would limit the products our “one” local lumber company could produce because they would lose the opportunity to select harvest in that area. We would also lose the opportunity to get a permit to harvest dead growth in these areas. Leaving the dead growth standing creates a serious fire hazard in a community protected by a small volunteer fire department. It is important to keep the forest a working and renewable forest, while supporting the economic growth of the community and providing locally sourced wood products.		The Nizina river, Lakina River, Kennicott River, Long Lake, Long Lake creek and Chitina River are anadromous. The Alaska Heritage Resources Survey (AHRs) indicates cultural resources within the unit. Portions of this unit are closed to mineral entry under MCO 159, 194, 194A01, 239, and 511, and MO 1045 and 1118. <i>Add the following or similar for W-16B Management Intent:</i> Lands within the unit are considered appropriate for disposal during the planning period. Development shall conform to the management guidelines set out in the Settlement and Shorelands and Stream Corridors sections of Chapter 2. Wetland areas should be avoided. See Table 2-1 of the Shorelands and Stream Corridors section in Chapter 2 for more information regarding setbacks and buffers. Development that may impact RS 2477 routes should ensure access is maintained. <i>Add the following or similar for W-16B Resources and Uses:</i>

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				This unit is located on the McCarthy Road between approximately milepost 52 and 56. RST 372 Nikolai Mine Trail traverses the northern portion of the unit. Brown bear and moose are found throughout with mountain goats concentrated in the northeast portion of the unit. The Alaska Heritage Resources Survey (AHRs) indicates cultural resources within the unit. Portions of this unit are closed to mineral entry under MCO 194, MO 1118, MCO 239, MCO 194A01, and MO 1274. <i>Add row for unit W-21.</i> W-21Se (Settlement) <i>Add the following or similar for W-21 Management Intent:</i> Lands within the unit are considered appropriate for disposal during the planning period. Prior to disposal, adjudicators should work with DOF to maximize the use of timber resources within the unit. See the Settlement and Forestry sections of Chapter 2 for additional management guidelines.

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				<i>Add the following or similar for W-21 Resources and Uses:</i> Located approximately 4 miles out of McCarthy on Nizina Road. Brown bear and moose are found throughout the unit. Subsistence use of moose, berries, and firewood take place throughout the unit. A portion of this unit is closed to mineral entry under MO 1274.
21	Subsurface Resources	2-62, 6. "Provide opportunities for the exploration and development of non-metallic minerals such as coal . . .". Has DNR not read the memo that coal is dirty and barbaric? Please remove.	The state has the constitutional and statutory directive to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest. This includes providing for the issuance, types and terms of leases for coal, oil, gas, oil shale, sodium, phosphate, potash, sulfur, pumice, and other minerals as may be prescribed by law. Coal exploration, development, and extraction are governed by a mix of statutory (AS 38.05.150 and AS 27.21.010-.260) and regulatory (11 AAC 85) requirements, which must be followed for exploration and for subsequent extraction to be authorized. Chapter 2 contains additional management guidelines applicable to coal exploration and development.	None.

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22	Classification/ Settlement and Special Use Areas	Failure to designate areas for special use and protection. Key moose and caribou rutting, over wintering habitat, movement and migration corridors, and brown and black bear denning areas (I.e. Alphabet Hills) need to be identified as special use areas. Even though most of the existing 1.2 million acres of state land in the basin remains in its original setting as undeveloped wildlife habitat, the addition of more settlement will adversely impact the wildlife and subsistence.	Special Use Areas are created to modify the regulations for Generally Allowed Uses, not to manage or restrict development. The majority of the land within the planning area will likely continue in it's original setting. The addition of new lands classified Settlement does not authorize development, nor will the entirety of a settlement unit be developed. Units are intentionally drawn to be larger to provide enough space for adjudicators to appropriately site future development to ensure minimal conflict with existing resources and uses. The plan provides extensive management guidelines pertaining to the protection of fish and wildlife habitat throughout Chapter 2 that affect nearly every resource value in the plan. Unit specific management intent is provided in the Resource Allocation Table in Chapter 3.	None.
23	Mineral Resources	3-23 management for Northern region- emphasis on mining. This should not be the case as it is the headwaters for the entire watershed. Mineral exploration is known to be bad for watersheds. The first priority is minerals, and second was listed as wildlife habitat... these are mutually exclusive.	The plan states that land throughout the region will be managed for multiple use with emphasis on mining, wildlife habitat, hunting, and dispersed recreation. There is no priority use. The focus of management is the continuation of the present patterns of land development, multiple and sustained yield of state land resources, and the protection of key habitats, fisheries, and wildlife populations. The entire region, except for	None.

#	Subject	Issue Summary	Response	Recommended Revision
			a few segments of a few rivers and streams, is open to mineral entry, and mining is recognized as an allowed use. The Resource Allocation Table directs adjudicators to ensure the protection of important habitat and harvest areas, to consider siting requirements that avoid or minimize impacts to principal habitat areas, and to consult with ADF&G to identify sensitive habitat areas prior to issuing an authorization.	
24	Forestry	Commercial logging on State lands in Wrangell-St. Elias NP/P should be managed to protect the McCarthy Road corridor view shed and avoid being visible from the road corridor. This includes the effects of clearing, logging, and brush/slash burn piles. Appropriate and timely controls/measures should be applied and utilized. This should also include Best Management Practices of invasive plants and reclamation of logging trails which precludes opening the logged area to future ORV use.	The primary purpose of the timber management program is to provide for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public lands and resources. Chapter 2 sets out the management guidelines and other pertinent guidelines and laws applicable to these activities such as; the Forest Land Use Plan, the Five-Year Schedule of Timber Sales, the Alaska Forest Resources and Practices Act (AS 41.17 & 11 AAC 95), the Alaska Land Act (AS 38.05 & 11 AAC 71). The Forest Practices Act provides statewide policy and regulatory authority for managing forestry related activities.	None.
25	Forestry	More forestry resources need to be designated for local residents to harvest firewood.	Lands do not require a Forestry designation for local residents to harvest firewood. Chapter 2 provides management guidelines applicable to	None.

#	Subject	Issue Summary	Response	Recommended Revision
			personal use wood harvest activities. The Division of Forestry & Fire Protection (DOF&FP) may provide wood products for personal use where forested lands are available near communities, and where personal use harvest is consistent with other purposes for which the land is being managed. In areas designated for settlement, personal use forestry permits may be issued by DOF&FP after consultation with DMLW's Land Conveyance Section to assure compatibility with future land sales.	
26	Forestry	Another consideration of forestry use in unit W-16 is that the building of logging roads, and reduction of fuels from the select removal of trees (all timber sales to this point have been thinning, not clear cuts) can be a vital tool in fire suppression efforts in the event of a forest fire. As it currently stands, there is mostly private land between unit W-16 and the town of McCarthy. If a fire were to occur, it may be difficult to suppress it due to the abundance of private property in that section.	Management guidelines pertaining to fire disturbance are provided in Chapter 2. Fire suppression will be a priority near residential areas or other forms of active land use, high value recreation use areas, and areas with infrastructure development. Consistent with AS 41.15.010 and AS 41.15.020, DOF&FP will protect forest resources from destructive agents commensurate with the values at risk identified in the Alaska Interagency Fire Management Plan. The Fire Management Plan indicates where suppression operations are likely to occur; generally, such operations are to be limited to decreasing the long-term risk of damaging fires and maintaining the natural diversity of forest stands, stand ages, and habitat types.	None.

#	Subject	Issue Summary	Response	Recommended Revision
27	Forestry	Include land designated Resource Management in the list of areas that are appropriate for timber harvests.	Concur. This designation was inadvertently omitted in the PRD. Land designated Resource Management are appropriate for timber harvest.	<i>Update language to include Resource Management in Chapter 2, Section J on page 2-28. Change title similar to: Timber Harvest in Areas Designated Settlement, Agriculture, Materials, Forestry, Minerals, or Resource Management.</i>
28	Land Management/ Special Use Areas	Does the revised plan recommend any Special Use Areas/LDA's?	The plan does not recommend any new Special Use Areas or Legislatively Designated Areas. It does recommend, upon conveyance to the state, the inclusion of Unit H-8 in the Tangle Lakes Archaeological District Special Use Area (ADL 228296). Similarly, if conveyed to the state, the top-filed lands in Unit M-3 should be considered for inclusion in the in the Thompson Pass Special Use Area (ADL 226446).	None.
29	Public Process	This planning effort needs local people on the planning team. The density of use, potential conflicts, mixed land ownership including many small land units, and lack of local government all combine to make this area a very complex planning area.	The Department of Natural Resources recognizes the importance of collaboration when managing natural resources. DNR's divisions typically engage with all stakeholders — including Tribal entities, local governments, community councils, private landowners, and state and federal agencies — during public comment periods as required by AS 38.05.945. During the Scoping Phase, the comment period was open for more than three months and DNR held seven public meetings (six in person and one virtual) during that time. For the Public	None.

#	Subject	Issue Summary	Response	Recommended Revision
			Review Draft, the comment period was open for more than three months and DNR held nine public meetings (seven in person and two virtual), thus far exceeding the statutory requirement for noticing and public engagement.	
30	Plan Development	The Glenn/Richardson Region (the highway corridors in the plan) should have a step-down plan completed. AK DOT is currently working on an updated plan for highway corridors. What efforts have been made to coordinate these plans?	The CRBAP is the land use plan for state-owned, state-selected and top-filed lands within the planning area. The plan establishes goals, objectives, management guidelines, and land classifications with management intent that apply to all state lands and affects all authorizations issued by DNR within the planning area. The Alaska Department of Transportation and Public Facilities is responsible for maintaining the highway and its associated structures. They were represented on the planning team and reviewed this document. A step down plan is outside of the scope of this planning process.	None.
31	Authority of State Plans	A McCarthy Road Corridor AKDOT Material Site Plan should be developed to meet current and anticipated needs between Lakina and Kennicott Rivers for State lands. Develop plan in conjunction with UA & Wrangell-St. Elias NP/P. Any proposed development should be situated outside the road-	The CRBAP will form the basis for the management of land and waters that are state-owned or selected by the state. The plan does not make decisions about specific land-use authorizations or propose projects. Chapter 2 provides goals and management guidelines for coordination with adjacent landowners and material sites, including guidance on siting, screening and rehabilitation.	None.

#	Subject	Issue Summary	Response	Recommended Revision
		corridor viewshed, and when feasible on private lands. Material site/sand and gravel development and extraction on State lands within Wrangell-St. Elias NP/P should avoid cultural and historical resources and have reclamation plans.		
32	Transportation and Infrastructure	The Copper River has moved to less than 100ft from the Old Richardson Highway between mile 102-103. This location would make a good pullout area for rafts and river travelers. Across from old pink school – (Unit H-42).	State land in that area is limited to the right-of-way for the Old Richardson Highway and there is not sufficient acreage to support a pullout.	None.
33	Special Use Areas	The plan needs to address conflicts between nonmotorized and motorized users as well as have consequences for permit holders who do not adhere to the terms of their agreement in the Thompson Pass Special Use Area.	Management guidelines identified in this plan are intended to provide specific standards, management direction or procedures to be followed by DNR in the issuance of permits, leases, or other authorizations for the use of state land or resources within the planning area. While managing noncompliance is outside of the scope of this plan and planning process, such instances should be reported immediately to the Regional Manager for the Southcentral Region Office within the Division of Mining, Land and Water.	None.
34	Plan Implementation	The plan sets broad levels of acceptable uses and highest and best use for units of land, but	The CRBAP is intended to provide an overall management strategy for state lands and resources within the planning	None.

#	Subject	Issue Summary	Response	Recommended Revision
		there are no on-the-ground actions discussed. Decisions made in the plan need to identify where and when the on-the-ground decisions get made, who/what is implementing the decision, and time frame for completion.	area, as well as specific management strategies for individual management units. The plan is the expression of how DNR will pursue this management and is applicable to all the divisions within DNR. Adjudicators will use this plan when reviewing and making decisions on authorizations for use of state land, including permits, leases, sales, conveyances, and rights-of-way. The plan guides state land use and resource decisions for the next 20 years or until the plan is revised.	
35	Land Exchange	The four remote isolated State land parcels situated in the mountains near Russell Glacier in Unit W-6 and elsewhere should be exchanged or sold to the National Park Service. The state should not exchange land with the Chugach Alaska Corporation (CAC).	This plan does not recommend any specific land exchanges, nor does it preclude land exchanges. Land exchanges are authorized through a separate administrative process under AS 38.50.010.	None.
36	Infrastructure	Please reflect that DOT/PF is the airport owner of record for McCarthy, Chisana and May Creek as shown in the Master Record lists.	Concur. A review of land status indicated DOT/PF as the owner of record.	<i>Pages 3-103 line 43 through page 3-104 line 2, Wrangell/McCarthy Region</i> <i>Description:</i> <i>Replace the following language:</i> The National Park Service [...] McCarthy landing strip. <i>with the following language or similar:</i> The State owns and operates McCarthy, Chisana, and May Creek airports.

#	Subject	Issue Summary	Response	Recommended Revision
37	Classification/ Wildlife Habitat	We support H-4 being managed for dispersed recreation and fish and wildlife resources and habitats.	Concur.	None.
38	Material Sites	I support H-5 for material sites. An additional 5 of these would be welcome, especially if they were ~40 acres in size near trails or access points to lakes and rivers.	This Plan provides general management intent for state lands, it does not make decisions about specific land-use authorizations. Additional material sites may be authorized through a separate and subsequent application review process and must be consistent with the plan and existing laws and regulations.	None.
39	Special Use Areas/ Thompson Pass	Where can I find the parameters of the Thompson Pass Special Use Area Designation ADL 226446?	The decision document and map are available on the DNR website at: https://dnr.alaska.gov/mlw/lands/special-use-areas/ .	<i>Update applicable maps to show the Thompson Pass Special Use Area boundary.</i>
40	Land Use/Chugach Mountains Region Description	3-122, Line 6. The residential development at mile 46 of the Richardson Highway has been left out.	Concur. This was inadvertently omitted in the Public Review Draft (PRD).	<i>Page 3-122, line 6. Replace text: “There is a small residential settlement area on the south side of the Richardson at approximately milepost 19.” with the following language or similar: There are small residential settlements in the area including those at approximately milepost 19 and 46.</i>
41	Navigable Waters	Page 3-134 and 135 Tables 3-19 and 3-20. The anadromous Lowe River is a hot spot for ice climbing, mixed climbing, ice skating, kite skiing, kayaking, rafting and fishing. It is valued by tourists and locals who stop	Concur in part. This information was based off of the Alaska Clean Water Actions program's watershed prioritization model which ranks watersheds based on watershed stressor and watershed value indices. This information helps to inform decisions	<i>Remove High Value column from table 3-19 on pages 3-134 and 3-135 and Table 3-20 on page 3-135. All classifications listed in tables 3-19 and 3-20 will remain unchanged.</i>

#	Subject	Issue Summary	Response	Recommended Revision
		to view Bridal Veil and Horsetail Falls. Please amend its “No High Value” status. Amend the status for the Tasnuna to Public Recreation and High Value. It is highly used by winter recreationalists, including snowmachiners, Heli-skiers and backcountry skiers.	regarding what actions may be most appropriate for that watershed and is independent of classification.	
42	Development Projects	I oppose a state vehicle bridge being built across Kennicott River, or McCarthy Creek. Limiting the bridge to foot traffic and ORV's allows for a more pedestrian friendly space for visitors and locals alike and creates business opportunities on the west side of the river. The limited access across the rivers has helped create a community of individuals who are independent, innovative, and resourceful. I support limited state subdivisions that are created with the intent to provide space for people who want to actually live here, not the growing trend of super	The CRBAP is intended to provide an overall management strategy for state lands and resources within the planning area, as well as specific management strategies for individual management units and is the expression of how ADNR will pursue this management. The plan does not make decisions about specific land-use authorizations. Authorizations are adjudicated through separate and subsequent administrative process.	None.

#	Subject	Issue Summary	Response	Recommended Revision
		wealthy 1 week a year vacation homes.		
43	Plan Boundary	The CRBAP includes the Matanuska-Susitna Borough and states on page 1-11 that these lands are to be managed by that Borough. Why was this area included in the CRBAP? The planning area should follow the old planning area boundaries, or a boundary change process should be undertaken.	The entire planning area is comprised of mixed land ownership. As part of this revision, the plan boundary was expanded to include state owned land that is within portions of the Matanuska-Susitna Borough around Lake Louise and a portion of the Denali Blocks for continuity of land management.	None.
44	Climate Change	Page 2-11, Lines 6 through 10: There is a complete omission that requires correcting: the effects of climate change on fish and wildlife and their habitats. Scientists are observing that as the climate warms, plant species move to higher altitudes and/or latitudes; they may change their times of leafing and flowering. In response, animals also move and/or adjust their habits if they are able to do so fast enough. North-facing slopes, which hold snow longer, are less prone to develop ice layers, and stay cooler throughout the year, can become important refugia. We urge that the first goal should include this sentence: "It is	Add language to the plan recognizing changes to the environment that should be considered as a result of climate change.	<i>Add climate change language to the Fish & Wildlife section of Ch. 2 similar to:</i> Fish and wildlife habitats across the planning area vary by region and season. Habitats are undergoing significant changes due to a changing climate. Wildfires are becoming more frequent; wetlands are drying; rivers are warming; permafrost is thawing; and water availability is declining. These shifts in habitats are expected to continue to affect fish and wildlife populations and distributions throughout the planning period, making it important to evaluate how activities will affect species in the context of ongoing climate change. Adjudicators should consult with the appropriate state or federal agency to determine the most current information on

#	Subject	Issue Summary	Response	Recommended Revision
		critical for the survival of our wildlife that climate change be considered before authorizing any development activities.”		fish and wildlife resources within the planning area.
45	Heritage Resources	Preserving cultural resources is of utmost importance, and it is disappointing that the plan relies solely on state records to identify cultural heritage sites, neglecting the opportunity for collaboration with local villages, regional corporations, and other non-governmental organizations to ensure their protection. I urge you to rectify this oversight and prioritize the inclusion of local knowledge and collaborative efforts in identifying and protecting these invaluable cultural resources.	The plan was not developed to be a comprehensive inventory of cultural and heritage resources. All efforts were made to identify all units where cultural or heritage resources were present using data obtained throughout the planning process. Because this is a state land use plan for managing state-owned lands, adjudicators must work with the Office of History and Archaeology to ensure implementation of the Alaska Historic Preservation Act under AS 41.35. Management guidelines in Chapter 2 are clear that adjudicators are to protect cultural resources through cooperation with concerned government agencies, Alaska Native corporations, statewide or local groups, and individuals to develop guidelines and recommendations on how to avoid or mitigate identified or potential conflicts.	None.
46	Public Access-Trails	I strongly advocate against the inclusion of any additional trail systems in the management plan. The ecological impact of such trails can be significant.	The plan does not recommend developing any new trails.	None.
47	Plan Development	DNR is using ADFG as a professional resource, but not sharing the data, only internally	ADF&G is one of many agencies that provided data and/or comments used to develop resource and use inventories for	None.

#	Subject	Issue Summary	Response	Recommended Revision
		reviewing. This should be publicly reviewed as well; this is not a transparent process.	the planning area. This data is included throughout the plan and is available in the Resource Allocation Table in Chapter 3. Our planning files are public record.	
48	Drones	Does the plan address the use of drones?	The plan does not address the use of drones as DNR does not have the authority to regulate the airspace.	None.
49	Renewable Energy Projects/Multiple Use	The plan needs to include designations for future renewable energy projects. Tikel Hydroelectric Project, High wind resource map areas, Geothermal areas. Multiple use without restrictions should be the default.	Classifications are multiple use in nature as set out in AS 38.05.300. The plan does not make decisions about specific land-use authorizations. Authorizations are adjudicated in a separate and subsequent administrative process. While there are some geothermal areas within the plan boundary, they are not on state-owned land.	None.
50	Land Management	Portions of the Highway Corridor Unit include multiple land parcels identified for disposal by different entities, such as the University of Alaska and DNR. Who will do the coordination to minimize conflict on proposed adjacent sales?	Chapter 2 sets out goals and management guidelines for Coordination and Public Notice that encourages coordinating the use of state land with that of private and other public landowners to provide for the optimal use, development, and protection of area resources. Units that contain mixed land ownership are identified in the Resource Allocation Table in Chapter 3.	None.
51	Material Sites	All material site development should have concurrent reclamation which includes removal and temporary	Under AS 27.19, reclamation is required for all mining operations, including sand and gravel extraction. Chapter 2 management guidelines for materials provide for a minimum 75-foot vegetation	None.

#	Subject	Issue Summary	Response	Recommended Revision
		stockpiling of vegetation, and soils for use in reclamation.	buffer in certain areas and specifically calls out the reclamation standard in AS 27.19.020 and 11 AAC 97.250. Reclamation plans, applications, and other requirements are part of a separate and subsequent administrative process.	
52	Mineral Order	I support Mineral Order 1274 which would close land classified Settlement or Agriculture to mineral development.	Concur. This mineral order is proposed as part of this plan revision.	None.
53	Mineral Order	Under AS 38.05.300, MO 1274 closes 336,976 acres to mineral entry for future land disposals. The MO states that mining activity would be incompatible with the proposed land use, does not contain any known mineral deposits, and was not selected for mineral values. Provide research that shows these areas contain no known mineral deposits.	Data on mineral values in the planning area was provided by the Alaska Division of Geological & Geophysical Surveys and is publicly available on their website.	None.
54	Mineral Order	Mineral Order 1274 closes approximately 336,976 acres of state land classified Settlement or Agricultural Land to mineral entry. Does this mean previously earmarked lands Agricultural and Settlement have been redesignated as mineral only?	All state-owned lands are open to mineral entry unless closed under AS 38.05.300. None of the lands designated as settlement or agriculture in the 1986 plan were changed to a minerals designation in this plan revision.	None.

#	Subject	Issue Summary	Response	Recommended Revision
55	Mining	The subsurface estate on all state lands and navigable riverbed corridors within Wrangell-St. Elias NP/P should be withdrawn from mineral entry and mineral development/extraction, except for Material Sites for sand, gravel, and rip rap.	Under AS 38.05.300, all state-owned lands are open to mineral entry unless mining, mineral entry or location, mineral prospecting, or mineral leasing is designated an incompatible use, or when the classification is necessary for a land disposal or exchange or is for the development of utility or transportation corridors or projects or similar projects or infrastructure.	None.
56	Mining	The decision of whether to allow mining activities must be made with caution. Once a company has invested money in exploring for and discovering an economic ore body, it becomes difficult for the state to deny permission to mine. The state must also consider whether it has the resources to monitor and enforce its regulations effectively.	This plan classifies state-owned lands according to their highest and best use and provides the basis for DNR decision making for state land and resources. The plan does not make decisions about specific land use authorizations or activities. Mining activities and authorizations are adjudicated under a separate and subsequent administrative process.	None.
57	Recreation	Conduct studies of potential areas for closure to future commercial activities such as Heli skiing. Commercial operations in high use areas should be managed through a limited entry with fees to support monitoring and management of commercial activities.	This plan was created using the best available data at the time of preparation. DNR has a multiple use mandate for state lands, and the plan cannot modify Generally Allowed Uses regulations under 11 AAC 96.020. These types of changes require creating special use areas and promulgating separate regulations. 11 AAC 96.018 does require registration for commercial operators for certain activities, including those involving	None.

#	Subject	Issue Summary	Response	Recommended Revision
			commercial recreation clients on state land.	
58	Wildlife Habitat	Page 3-68 Unit H-8: The inlet creek to Swede Lake may also be anadromous; please check with Sport Fish in Glennallen.	Concur. This was inadvertently omitted in the PRD.	<i>Add the following or similar for H-8</i> Resources and Uses: Swede Creek and Swede Lake are anadromous.
59	Heritage Resources/ Land Conveyance	Page 3-68 Unit H-8: We strongly support the whole unit being conveyed to the state and included in the TLAD SUA. We strongly oppose its conveyance to the University of Alaska because UA's two mentioned development/monetization options strongly conflict with long-time established uses of public recreation and hunting. UA lists "1) Remote recreation (e.g., hunting and guide permits)" for an area that is already heavily used by Alaskan hunters and "2) "Subdivision and sale" which would close these areas to the general public.	Unit H-8 is recommended for inclusion in the Tangle Lakes Archaeological District Special Use Area upon conveyance to the state. This plan does not recommend any specific land conveyances to the University. The plan does honor the intent of existing settlement agreements with the University of Alaska. These settlement agreements as well as pertinent sections of state law and regulation shall prevail over the area plan, if inconsistencies exist.	None.
60	Regions	There are 6 designated regions on the map, and the Copper River Census Area, which matches the Regional Education Attendance Area boundary, is one region. What are the other five? DNR states that "regions" are set up by watershed regions,	Boundaries for area plans generally follow watersheds, and within each area plan, there are regions. The regions are geographic areas characterized by large blocks of state land, often contiguous to each other, and located within an area with distinctive characteristics. They are often demarcated by major topographic or	None.

#	Subject	Issue Summary	Response	Recommended Revision
		what watershed is this transportation region? Designating regions leave the area open to future divisions of these areas into different regions.	hydrologic features and infrastructure. Census areas have no bearing on the area plan or region boundaries, nor does the plan have any authority to divide or redraw census areas.	
61	Classification/ Public Recreation - Tourism and Public Use Sites	We rely on state resources for our livelihood. We have multiple DNR permits for such things as gravel extraction, bridge ROW, and cross-country travel. Our entire livelihood originates in the McCarthy area. McCarthy is surrounded by National Park & Preserve, which sometimes feels stifling to development. We are opposed to any State lands being designated as Tourism or any other status that inhibits resource use or development.	Under AS 38.05.300, all designations are multiple use. Uses other than those receiving primary designations for a given unit may still be authorized if they are compatible with the primary uses or resources for which a unit is designated. If DNR determines that a proposed use is incompatible with a primary designation, the proposed use will not be authorized or will be authorized in a manner that minimizes the incompatibility.	None.
62	Settlement	When land is designated Settlement, can it still be used for hunting, gathering, firewood, and recreational use until it is converted to an actual land sale, or does Settlement mean it becomes off limits immediately?	Under AS 38.05.300, all designations are multiple use. Uses other than those receiving primary designations for a given unit may still be authorized if they are compatible with the primary uses or resources for which a unit is designated. Generally Allowed Uses listed under 11 AAC 96.020 are permitted on land designated Settlement until land is included as part of a land sale.	None.

#	Subject	Issue Summary	Response	Recommended Revision
63	Minerals (Page 2-34 Lines 15-16)	Precious metals are found throughout, but no mention of specific areas. These minerals do not actually occur throughout the planning area; they are areas within the plan area where such resources have been discovered. The plan should identify specific areas where mineralization is known or likely to occur.	Unit N-2 is designated Minerals. It is not the purpose of this plan to provide specific deposit locations.	None.
64	Public Access - RS 2477	The plan acknowledges RS 2477 trails in several units, but RS 2477 trails don't exist unless the state claims them and maintains them. Please start maintaining all the claimed RS 2477 trails. They are unusable without maintenance, and the state will never be able to perfect their right to them without maintaining them.	The state is not required to maintain RS 2477 rights-of-way to identify or legally validate their existence.	None.
65	Waste Management	Waste management is an ongoing struggle. With no municipal government in the area, there is no city planning in place to accommodate increased settlement on the scale suggested in W-16. Lack of access to waste management threatens habitat and water quality that supports an	The planning of services such as waste management is beyond the scope of an area plan. A settlement designation does not mean these lands will be developed. Future development is subject to a separate and subsequent administrative process.	None.

#	Subject	Issue Summary	Response	Recommended Revision
		important subsistence lifestyle in the region.		
66	Transportation	Transportation goals outlined in the plan should incorporate a section specifically addressing the replacement of culverts to promote adequate water and fish passage. It is essential to reference research on permafrost stability and seismic activity to ensure the infrastructure's resilience and minimize potential environmental impacts.	Management guidelines in Chapter 2 address culverts and the protection of hydrologic systems. Replacement of culverts is project specific, and this level of detail is beyond the scope of this plan. Additional research on stability and resilience is project specific.	None.
67	Public Notice	Thompson Pass is a popular world-class recreation area and use will likely continue to increase in the future. CRBAP recommendations emphasize expanding recreation opportunities including commercial recreation. Chugach Alaska Corporation (CAC) is concerned about potential trespass issues that could affect corporate lands and requests an opportunity to comment on any proposed state permit applications.	Permitting is a separate and subsequent administrative process from this plan and is subject to its own public notice requirements.	None.
68	Wildlife Habitat	Page 3-82 (H-63) & Page 3-122, line 16. Trumpeter swans are not limited to the “northernmost portion of the unit”. They are in	DNR uses the best available information to prepare plans. The data did not indicate a particular concentration or sensitive life	None.

#	Subject	Issue Summary	Response	Recommended Revision
		multiple locations including but not limited to Blueberry Lake, a small unnamed lake on the hairpin parcel and the ponds at about 16 ½ mile.	stage in the northernmost portion of this unit.	
69	Mineral Order	We recommend that H-4 lands be closed to new mineral entry.	Portions of this unit are already closed to mineral entry under MCO 511 and MCO 483, MO 1045, and MO 1118. The plan recommends keeping existing mineral orders in place.	None.
70	Region Description – Chugach Mountains Region/Wildlife Habitat	Page 3-122, line 14. Moose rutting habitat occurs in multiple other areas including the flats before Keystone Canyon.	Unit specific information on moose rutting is provided in the Resource Allocation Table in Chapter 3. Adding clarifying language in the region description will improve accuracy.	<i>Add language similar to:</i> Moose rut in multiple areas throughout the region.
71	Heritage Resources and Fish and Wildlife Habitat	Please protect the heritage and wildlife habitat resources in the Denali Highway - TLAD area. The Nelchina caribou herd, moose, fox, wolves, ground squirrels, waterfowl, ptarmigan depend upon this area for its high habitat values.	The Resource Allocation Table in Chapter 3 recognizes the importance and provides for the management of these resources in units H-7 and H-8.	None.
72	Wildlife Habitat	Develop measures to enhance wildlife viewing and provide more protection for Long Lake salmon fisheries. Recommend establishing a Wildlife Protection Area with ADF&G that prohibits bear hunting and	The plan no longer recommends the area surrounding Long Lake for settlement. Chapter 2 goals and management guidelines includes comprehensive areawide land management policies protecting fish and wildlife habitats and does not recommend establishing a special protection area at this time. Bear	None.

#	Subject	Issue Summary	Response	Recommended Revision
		new settlement on State lands surrounding Long Lake.	hunting regulations are beyond the purview of this plan and the authorities of DNR.	
73	Minerals	Critical Wildlife habitat should be closed to mineral development.	Under AS 38.05.300, all state lands are open to mineral location unless specifically closed. Any adverse effects of mining on surface resources or uses will be managed through compliance with state laws and regulations and the management guidelines in this plan. Chapter 2 provides specific information related to mining activities in habitat areas.	None.
74	Wildlife Habitat	No recreational use designations in any Caribou Calving grounds or Moose Wintering areas.	Under AS 38.05.300, all designations are for multiple use. Uses other than those receiving primary designations for a given unit may still be authorized if they are not incompatible with the primary uses or resources for which a unit is designated. This plan does not restrict Generally Allowed Uses listed under 11 AAC 96.020.	None.
75	Wildlife Habitat	Establish a Tangle Lakes State Game Refuge Area for protection of critical Caribou and wildlife habitat and that the area be managed by ADF&G. This refuge would prioritize and protect the wildlife habitat and control the use of ORVs.	This plan does not recommend establishing a State Game Refuge. The existing special use area has regulations managing motorized vehicles, and the plan provides management guidelines for habitat in this area.	None.

#	Subject	Issue Summary	Response	Recommended Revision
76	Land Disposal	Against further Settlement & Agricultural development in the Kenny Lake, Copper Center, and McCarthy areas. Protect fish and wildlife habitat and drinking water. Protect Kenny Lake's community water wells.	Under AS 38.04.065, the state is required to identify areas of settlement, including land for agricultural purposes. Chapter 2 goals and management guidelines set out site specific requirements for Settlement and Agricultural development including setbacks and buffers as well as guidance on providing an open-space system to preserve important fish and wildlife habitats and natural areas such as shorelands, freshwater wetlands, and riparian areas.	None.
77	Wildlife Habitat/ Recreation	The Denali Highway region is valued by a great number and variety of Alaskans. It was used by the AHTNA people for hunting, fishing, berry-picking, and even marriage ceremonies between people from the eastern and western sides. Hunting, fishing, and berry-picking continue to be important annual activities for Alaskans. Its open terrain is favored by hikers, while it also provides scenic views for tourists and Alaskans driving through.	Concur.	None.
78	Invasive Plants	Take measures to prevent and control the spread of invasive plant species.	Overall management goals in the plan include avoiding the introduction and reducing the spread of invasive plants. Specific measures to prevent the spread of invasive species are set out during the	None.

#	Subject	Issue Summary	Response	Recommended Revision
			adjudication process for project specific authorizations and shall be consistent with the applicable requirements of 11 AAC 34.	
79	Land Sales	The 1986 plan Page 3-57 (mgmt. unit 8) states: Tazlina Lake “Settlement, through land offerings or remote cabin permits, is not allowed in this management unit.” What changed? Most of the land at the northern end of Tazlina Lake (unit C1) is wet, swampy, and unsuitable for settlement. Tazlina Lake is my clan's ancestral home, most of whom now are Tribal Members of Tazlina Village. The Village was never contacted about this plan. Designating this area as Settlement will only benefit those who can afford to build remote structures. The Lake Louise area is littered with abandoned structures and litter. Opening this area to Settlement will produce the same results. Development in this area will also destroy the salmon habitat we depend on for subsistence harvest.	DNR is required by statute to identify land for private use and settlement. The nature of state land available for private ownership is influenced by both the characteristics of land designated for settlement, and the type of land sales program that makes it available. Chapter 2 goals and management guidelines provide protection, management, and enhancement of other resources. Unit specific guidance in Chapter 3 requires protection of known heritage sites and cultural resources, as well as lots identified through the sale process as open space, buffers, or access routes to be retained. Development shall exclude wetland areas and a riparian buffer of at least 100’ landward from the ordinary high-water line shall be maintained along Tazlina Lake. Adjudicators are required to consult with ADF&G to identify sensitive habits.	None.

#	Subject	Issue Summary	Response	Recommended Revision
80	Land Sales	There is demand for land sale parcels with desirable views, lake and riverfront, good access, and amenities. Demand for remote parcels has not been high over the years and is costly to develop.	Chapter 2 goals and management guidelines provides for multiple settlement categories. The nature of state land available for private ownership is influenced by both the characteristics of land designated for settlement, and the type of land sales program that makes it available.	None.
81	Land Sales	There is a proposed state land conveyance, aka "Copper River Wilderness Subdivision" that has access issues represented in Units H-42 or H-43.	Access concerns are addressed and remedied during a separate and subsequent administrative process should the area be offered for sale.	None.
82	Land Sales	Opening so much Settlement land in the CRBAP area will flood the land sale market and drive down prices for private sellers.	Chapter 2 management guidelines address competition, providing the state may compete with the private sector or local governments if necessary to satisfy demand, provide market choice, or moderate unreasonably high prices.	None.
83	Land Sales/Public Notice	Chugach Alaska Corporation (CAC) is concerned about potential trespass and management issues that could occur with additional land disposals on adjacent state lands. There may be opportunities to mitigate potential trespass and management issues on CAC lands prior to disposing of state lands. Please advise CAC of any potential land disposals so we may review potential	This is outside the scope of the plan. AS 38.05.945 requires public notice for decisions involving the sale, lease, or disposal of (or interests in) land, property, or resources. Notice will be given to parties known or likely to be affected by an action proposed by the state or an applicant to the state.	None.

#	Subject	Issue Summary	Response	Recommended Revision
		subdivisions and offer input prior to disposal.		
84	Land Sales	No settlement lands should be considered within units M1, M2, and M3.	Units M1, M2, and M3 are not considered for settlement in the plan and are designated Resource Management, Wildlife Habitat, and Public Recreation Dispersed respectively.	None.
85	Land Sales	Unit O-10 should be closed for Remote Settlement. According to ADFG Glennallen, in recent years due to difficult winters, the Nelchina Caribou herd has gone from 35,000 to 17,000. The herd is struggling with the consequences of climate change and increased human activity. Caribou calving and winter use habitat are present throughout this unit, with rutting areas present in the southern half of O-10.	The management intent for this unit provides guidance on project design and siting. Caribou data indicates that caribou rutting is concentrated in the northern portion of the unit and there is no calving within this unit.	None.
86	Land Sales	Any future State land disposal proposals should be restricted to lands outside the external boundaries of established federal conservation areas and other high use recreational corridors within or proximal to federal lands.	The nature of state land available for private ownership is influenced by both the characteristics of land designated for settlement, and the type of land sales program that makes it available. One of the plan goals is to offer land suitable for seasonal recreation use. This category of land disposal is intended to provide land, often in remote locations, for recreational needs.	None.

#	Subject	Issue Summary	Response	Recommended Revision
87	Land Sales	Support opening additional Settlement lands including Remote Recreation Cabin Staking in the McCarthy area. Additional settlement opportunities would bring hardworking people and additional diversity to our community that could lead to additional work opportunities and services.	The plan identifies land for settlement in the McCarthy area.	None.
88	Land Sales	Before identifying, delineating, subdividing and/or establishing a settlement area, that proposed subdivision plan should consider wildlife travel corridors and essential habitat, wetlands, protecting natural undeveloped landscapes and be available for public comment.	Chapter 2 goals, management guidelines, and in some cases unit specific management intent require subdivisions to be designed to preserve and enhance the quality of the natural setting and the recreational opportunities that make an area attractive to potential buyers. In the design of land disposals, consideration is given to an open-space system to preserve important fish and wildlife habitats and natural areas such as shorelands, freshwater wetlands, and riparian lands. Riparian buffers or building setbacks are imposed on all disposals where important riparian areas have been determined to exist. Consideration is also given to the connectivity of habitat types as well as access to fish and wildlife resources. As required by AS 38.05.945, public notice will be given for decisions involving the sale, lease, or disposal of (or interests in) land, property, or resources.	None.

#	Subject	Issue Summary	Response	Recommended Revision
89	Land Sales	Proposed settlements are located near wetlands and riparian habitats, which are ecologically sensitive areas. These locations possess unsuitable soil for development or construction purposes, raising concerns about the potential degradation of these fragile ecosystems.	Chapter 2 management guidelines, and in some cases unit specific management intent, provide guidance for the protection of wetlands and riparian habitats. State subdivision design will take account of site limitations and opportunities such as slope, drainage, soils, erosion, riparian zone and coastal buffer, and other features to ensure that sites offered are buildable and can be developed without the need for extensive public infrastructure. Riparian buffers or building setbacks shall be imposed on all disposals where important riparian areas have been determined to exist.	None.
90	Land Sales	The economic development goals outlined in the plan should consider the feasibility of development and settlement disposals, particularly in remote access areas. It is crucial to ensure that such development serves the interests of local communities and supports the workforce in the region.	Settlement goals in Chapter 2 direct DNR to provide opportunities for jobs and income by managing state land and resources to support a vital, self-sustaining, and diverse local economy. Land disposals should be sited and planned to minimize the costs of infrastructure and other services resulting from settlement. Disposals should be focused on areas of existing settlement; areas along the road system or a waterway that can be easily accessed by water transport; or areas where service requirements may be provided by local government or community organizations.	None.
91	Land Sales	Page 2-21, the plan talks about protection of riverine areas, yet	This plan has gone through a number of amendments that authorized additional	None.

#	Subject	Issue Summary	Response	Recommended Revision
		the majority of the lands identified for disposal are around or along waterways.	land sales throughout the planning area. This revision retained most existing land use patterns. Chapter 2 management guidelines and unit specific management intent in Chapter 3 requires setbacks, buffers, and protection of riverine areas as part of subdivision design.	
92	Land Sales	When developing land for any reason, DNR should include property designs, utility rights-of-way, and easements. Rights-of-way and easements are essential for having utilities to any property. Utility service to any property generally makes the property more attractive and of greater value to the property user. Also consider wireless cellular tower locations and wireless service to the immediate area of property being considered for development by DNR.	Utility rights-of-way and easements are part of the survey and subdivision process which is administered under its own statutes and regulations. Cellular towers are driven by application and not something the state considers or provides as part of subdivision design.	None.
93	Land Sales	Recreational cabins and recreational lands are far different than Settlement. We need settlement for our children's housing, for growth, for permanent residents not weekend warriors. Our immediate needs are to get Settlements near infrastructure	Chapter 2 goals and management guidelines direct DNR to provide suitable public land for transfer to private ownership for settlement purposes. One of the settlement categories DNR strives to satisfy is year-round residences for community expansion. DNR will offer accessible land suitable to meet the needs of existing communities. This category	None.

#	Subject	Issue Summary	Response	Recommended Revision
		with roads so they can drive to work daily. The problem is remote cabins are remote and not feasible for our housing needs for full-time residents.	serves people whose principal place of residence and work is, or will be, in the area of the disposal. It also includes land disposals of commercial and industrial land to accommodate the expansion needs of communities. This land will be provided as demand warrants, subject to the availability of funding.	
94	Wetlands	Delineate wetland areas and prepare wetland maps. Prohibit building new structures and roads within delineated wetland areas. Many past State settlement subdivisions have road ROWs platted through wetland areas. This results in unusable or high-cost construction access, which can cause unnecessary environmental degradation.	Chapter 2 management guidelines require that sensitive areas such as wetlands or potentially dangerous areas such as areas with unstable soil, riverbanks subject to active stream erosion, or within floodways or floodplains, should be avoided in subdivision design or protected by retaining these areas in state ownership or restricting their use through developmental reservations or restrictions.	None.
95	Land Sales	Within a settlement area, restrict ORV use to platted corridors.	Restricting ORV use is beyond the scope of this plan. Using a recreational-type off-road or all-terrain vehicle with a curb weight of up to 1,500 pounds, including a snowmobile and four-wheeler, on or off an established road easement if use off the road easement does not cause or contribute to water quality degradation, alteration of drainage systems, significant rutting, ground disturbance, or thermal erosion is a generally allowed use under 11 AAC 96.020.	None.

#	Subject	Issue Summary	Response	Recommended Revision
96	Maps	Diagrams/Maps – areas are not easy to read or identify locations with no tangible reference point to orient yourself. Maps should have landmarks including mile markers, roads, water bodies and satellite image background so when looking at the individual maps you can orient what you’re looking at.	Maps and diagrams will be updated to add more reference points.	<i>Update maps to include reference points that are appropriate. Lakes, Mountains, Roads, etc.</i>
97	Maps	The discussion in the plan regarding planning & management of the Lake Louise area was particularly confusing. It would be helpful to include a map in the plan which shows what land will continue to be under the jurisdiction of the Mat-Su Borough and which lands are included within the CRBA planning area.	Map 3-3.2 shows the breakdown of land ownership in the Lake Louise area. The plan does not provide management intent for prescribing actions and policies for agents and governments other than DNR. It only applies to state-owned and state-selected lands managed by DNR.c	None.
98	Public Access	Access for the general public is not adequate in the Lake Louise area. Take your kayak or skiff out on the lakes and look for a place to pull out along the shoreline for lunch? Definitely not enough public access along lake shorelines. If the plan can include some public recreation land along the Lake Louise shoreline, please do so.	Chapter 2 provides management guidelines for easements, riparian buffers, building setbacks and related environmental features. Prior to disposal of state land DNR will reserve an access easement to and along water determined under 11 AAC 51.035 to be navigable or public water. In most cases this easement extends at least 50 feet upland from the ordinary high-water mark.	None.

#	Subject	Issue Summary	Response	Recommended Revision
99	Public Recreation	Can the plan add public recreation land for those who want a remote camping area for overnight camping?	All classifications are multiple use in nature. The area plan does not regulate activities identified as Generally Allowed Uses under 11 AAC 96.020. This includes recreation activities like setting up and using a camp for personal, noncommercial recreational purposes for no more than 14 days at one site. These activities do not require a written authorization on state land and are not restricted by classification.	None.
100	Technical Corrections - Plan Wide	Make all factual corrections to the Plan. May include correcting grammatical errors, map notations, rewording for clarification, acreage recalculations, etc. These corrections will not affect Plan policy.	Concur.	<i>Change as appropriate.</i>
101	Land Status	The McCarthy Creek Airstrip parcel is inaccurately depicted as State land on this map. Ownership of this airstrip is very much in question by multiple parties. This airstrip was not transferred into State ownership, as some other airport properties were, with the passage of the May 7th, 1959, Alaska Omnibus Bill. I'm requesting that this parcel be removed from the CRBAP planning process and	Concur.	<i>Remove parcel from Unit W-19 and update Map 3-6.2 on page 3-119 to show this parcel as private land.</i>

#	Subject	Issue Summary	Response	Recommended Revision
		removed from all DNR maps inaccurately depicting it as State land.		
102	Minerals	Pages 2-34 lines 15-16 states precious metals are found throughout, but no mention of specific areas. Lines 15-16 refers to “sands lining the Copper River’s mouth” – we believe the statement may have intended to apply to the Copper River Basin, not the river’s mouth as the Copper River’s mouth lies well south of the planning area. Lines 18-19 refers to placer gold being found as inclusions in rocks and within rock veins, this is incorrect – if gold is “found as inclusions in rocks and within rock veins” it would be lode, not a placer deposit. Lines 20-21, reads “Ultramafic metamorphic rocks are the result of alterations to a rocks composition or structure due to immense heat, pressure, and other volcanic activity”. Actually, there are many magmatic ultramafic rocks and those in particular have high PGE and Cr potential. Pages 2-34 and 2-35 are overly simplistic, geologically	Concur. The minerals section as drafted in the PRD was unclear and had some technical errors. This section was drafted by a geologist.	<i>Pg. 2-34</i> <i>Change language from:</i> found throughout sand linings, <i>to:</i> throughout fluvial sands, <i>Replace text:</i> Placer gold’s [...] silica stone composition. <i>with the following language or similar:</i> In these areas, rocks are expected to be ultramafic, rather than mafic as commonly occur throughout the planning area. Metamorphic rocks in this area are the product of changes to composition or structure due to immense heat, pressure, or hydrothermal activity. Ultramafic rocks are igneous, mantle-derived rocks characterized by very low silica and very high magnesium content. They consist of a majority mafic minerals like olivine, pyroxene, high iron, nickel, chromium, cobalt, and low potassium. Precious metals are generally rarer than nonprecious metals, such as base metals; however, placer gold is not considered rare. Within the planning area placer gold has a high potential in the Glenn/Richardson and Central regions.

#	Subject	Issue Summary	Response	Recommended Revision
		inaccurate and confusing. These are just a few of the statements on pages 2-34 and 2-35 indicating this section was not reviewed by DGGS or a geologist.		Precious metals are generally low-reactivity, non-reactive, or chemically inert, meaning that they are not susceptible to oxidation or other chemical alteration when exposed to air, moisture, and common acids. Industrial rocks and minerals are non-metals essential to many infrastructure uses like the construction of buildings and roads. Industrial rocks and minerals include crushed rock, sand, and gravel typically composed of limestone, clays, sandstones, silica, gypsum, and talc. Within the Copper River Basin planning area, limestone, clays, sandstones, and silica stones are most common. Limestones are considered biological or chemical sedimentary rocks as they form from the accumulation of organic debris or precipitation of dissolved calcium carbonate minerals from water. Clays are found as sediments at the bottom of water bodies, buried under sedimentary rocks where water had penetrated through pores in the rock beds, and in rock bodies that have hydrothermally altered or through the chemical weathering and decomposition of silicate-bearing rocks, such as granite, when exposed to water, air, and organic acids. There is a high sandstone potential on the eastern and western sides of the planning area, with the western side's

#	Subject	Issue Summary	Response	Recommended Revision
				potential being especially concentrated with the Chugach Mountains, Central, and the Northwest portion of the planning area being most notable. Sandstones are clastic sedimentary rocks mostly composed of sand-size silicate grains. Quartz and feldspar are common groups of minerals found in sandstone.
103	Relationship to Local Plans	The plan revision does not include local or regional plans like the Comprehensive Economic Development Strategy (CEDS) by Copper Valley Development Association 2003 (Currently being updated).	Local and regional plans were reviewed as part of plan development. While community comprehensive plans can make recommendations for state lands within their planning areas, they cannot establish land use designations or other planning requirements for state land. State land use designations are decided on a regional basis through the statutorily mandated state land use planning process and local plans do not supersede state plans for the use of state lands.	None.
104	Plan Development	I began to read the plan and got through the introduction. It was incredibly cumbersome and not clear as to what the actual intent of the plan curtails. I found multiple redundancies and complex topics that were not relevant to the topic at hand. I understand that the State needs to be detailed and comprehensive in order to provide definitive guidelines for	AS 36.04.065 requires the Commissioner of the Department of Natural Resources to “adopt, maintain, and when appropriate, revise regional land use plans that provide for the use and management of state-owned land.” The planning process provides a means of openly reviewing resource information and public concerns before making long-term decisions about public land management. The planning process resolves conflicting ideas on land use and informs the public	None.

#	Subject	Issue Summary	Response	Recommended Revision
		classification and management of lands, but it doesn't need to be inefficient in that approach. Just project the points of the plan somewhere in the initial document without the inundation of unnecessary information such as climate zones and foliage. I am sure this would be cost effective and encourage more public participation.	about what choices were made and why. Decisions are made on a comprehensive basis, rather than case-by-case, providing consistency and consideration of the wide diversity of resources and uses within the planning area.	
105	Classification	The plan incorporates federal and private land into the CRBAP when the state has no authority to manage these lands, leading to a misrepresentation of the amount of land designated as wildlife habitat.	While some units contain mixed land ownership and are identified as such in the Resource Allocation Table in Chapter 3, the plan states in multiple places that the CRBAP is the state land use plan for state-owned, state-selected and top filed lands in the Copper River Basin Area, and that this Plan does not apply to federal, Native, private lands, University of Alaska, Alaska Department of Transportation and Public Facilities, or Mental Health Trust Land. The plan differentiates between the amount of state land within the planning area and total acreage within the planning area. While individual units in Chapter 3 are calculated based on total acreage and not ownership, Chapter 4 contains a breakdown of acreages associated with land designations and classifications based solely on state land.	None.

#	Subject	Issue Summary	Response	Recommended Revision
106	Plan Development	The “H” section of the plan is the part of the entire area which has, and will continue to have, the most potential for management conflicts. The scale of the highway corridors, when being planned in the context of the adjoining acreage which is given a broad-brush approach, makes this very difficult. It may be beneficial to split out the highway corridors from the adjoining 5 million acres and make the highway corridors a separate area plan with more detail? Or eliminate the “H” section and instead add those lands in the highway units into the adjoining land unit.	The planning area is separated into six individual management regions that occupy areas with similar characteristics and management direction. The Glenn/Richardson Region (H) recognizes the significance of the highway corridors within the larger planning area while the smaller management units have their own management guidelines that highlight the diversity of uses and resources in the area.	None.
107	Public Recreation	Develop a Campground Recreational Plan for State lands proximal to the road system in the Copper River Basin. Maintain all existing and develop new campgrounds along the road system. Numerous travelers camp overnight in pullouts without adequate facilities such as toilets. Campgrounds are an appropriate means to manage and control visitors’ use.	While a detailed recreational plan is beyond the scope of this planning process, this plan provides management intent for State Recreation Sites on the road system and makes recommendations for land to be added to existing sites or creating new areas.	None.

#	Subject	Issue Summary	Response	Recommended Revision
108	Public Access	ANCSA 17b. Recommend that the State of Alaska work closely with Federal agencies and Native Corporations to ensure that all reserved ANCSA easements are situated along a practical and maintainable location alignment.	Chapter 2 provides guidance related to 17(b) easements.	None.
109	Wildlife Habitat	Regarding the order of fish and wildlife habitat and harvest goals: priority of uses needs to change. The Plan lists commercial, recreational, and then traditional uses. Subsistence resources should be listed first followed by commercial and recreational uses.	The list is not in any priority order.	None.
110	Regions	Loss of Copper River Regional Area Lands. Why are you taking away land from our region and giving it to Valdez-Cordova? More Revenue to Valdez?	The CRBAP is the land use plan for state-owned, state-selected, and top-filed lands in the Copper River Basin Area. It provides the basis for management of state lands and resources and affects all authorizations issued by the DNR. Area plans do not give land to a region, nor do they take land away. Area plans do not create, distribute, or manage revenue. The plan boundary was expanded as part of this revision to provide continuity of management for Special Use Areas and adjacent lands with the same attributes and historical land use.	None.

#	Subject	Issue Summary	Response	Recommended Revision
111	Plan Development	Existing Management vs Proposed Management: for each of the planning units within the plan area, it would be much more understandable if you could describe the existing management approach along with the proposed new management approach, as well as the rationale for the change in strategy.	The information and policies contained in the 1986 CRBAP were used as the basis for this plan revision and many changes have been made in order to address changes in land ownership, changed patterns of development, and more recent resource information. These changes allow the Department to fulfill the mission and statutory requirements of the agency, are responsive to the needs of the agency and the public, reflect current information and understanding of natural and cultural resources, and revise state management intent and policies to reflect changes in land ownership and use. The 1986 plan and the recent Public Review Draft was available online for review, as was an interactive map that had the 1986 units with designations and the units and designations proposed in the Public Review Draft.	None.
112	Technical Correction	Discrepancies in acreage numbers need to be verified.	Concur.	<i>Verify all acreages and make corrections where appropriate.</i>
113	Plan Development	Keep most of the language from the 1986 plan.	Under AS 38.04.065, the Commissioner of DNR is required to “adopt, maintain, and when appropriate, revise regional land use plans that provide for the use and management of state-owned land.” The current CRBAP was prepared in the early 1980's and adopted in 1986. Much has changed over the past 40 years. A variety of economic and demographic trends has	None.

#	Subject	Issue Summary	Response	Recommended Revision
			affected community expansion and development. There has been a decline in the inventory of state land in the areas along and adjoining the highways, especially along the Glenn Highway. Since the 1980's, the amount of state land has decreased with state land being conveyed to the University of Alaska, and to private parties through state land and agricultural land sales and settlements. Conversely, the overall amount of state-owned land in the planning area increased substantially, with the state receiving tentative approval or patent to an additional 1.9 million acres. This has resulted in a decreased and dispersed state land base in the areas near the highways with extensive state holdings in the more remote and inaccessible parts of the planning area. Additionally, the 1986 area plan has been found difficult to use for decision making in DNR since its land ownership patterns and land classification designations do not reflect the current patterns of state ownership or land classifications.	
114	Classification	In H-1, the generalized language for all segments of the transportation corridor is a poor fit for the Denali Highway, which receives, for instance, nowhere near the traffic of the Richardson and Glenn	The plan already contains this information. Unit H-1 is co-designated Transportation Corridor and Materials, which applies to land identified for the location of easements and rights-of-way under AS 38.04.065(f), including transportation, pipeline, utility corridors,	None.

#	Subject	Issue Summary	Response	Recommended Revision
		Highways. There is no need for the highway to have more than preventive maintenance, no need for side roads. This segment of the highway already has a very good wayside with toilets that the state should continue to maintain. We ask that a paragraph be inserted that states this, and that gives stronger protection to wildlife and, especially with regard to the Gulkana River, fish. All state lands along the Denali Highway should be retained in state ownership and all selected lands should be transferred to the state.	or is under consideration for a right-of-way lease. This designation reflects the need for efficient inter-regional infrastructure, the need for intra-regional access to resources on state and non-state land, and consideration of the impacts of increased access on resource uses. This land is to be retained in state ownership. The management intent for Unit H-1 stresses the importance of the fish and wildlife habitat resources and values and the protection of these values. Unit H-1 is surrounded on both sides by Unit H-4, which is designated Public Recreation Dispersed and Wildlife Habitat and makes up the bulk of this region. Unit H-4 is more than three times larger than Unit H-1 and is to be managed for dispersed recreation opportunities and the protection of fish and wildlife resources and their habitats, especially caribou and moose habitat. This unit is also to be retained in state ownership. The Gulkana River is in Unit O-3 in the Northwest Region. The management intent for this unit states: "Unit is to be managed to protect the scenic, recreational, fish and wildlife resources and their habitats, and other similar values of the Gulkana National Wild River corridor consistent with the provisions of the Gulkana River Shorelands and Waters Special Use Land Designation (ADL 229819) and the	

#	Subject	Issue Summary	Response	Recommended Revision
			Gulkana National Wild River Memorandum of Understanding between ADNR and BLM (ADL 224876). The Gulkana River Shorelands and Waters Special Use Land Designation restricts some uses that would otherwise be allowed without a permit under 11 AAC 96.020, Generally Allowed Uses. The 1985 MOU provides a mechanism for cooperative management of the lands and waters in the Gulkana River area between ADNR and BLM consistent with protection of river values but also allows access and uses consistent with the provisions of ANILCA. Retain in state ownership."	
115	Classification	The plan needs to include designations for planned utility and transportation corridors such as for the Glennallen-Sutton Intertie.	All classifications (which are derived from designations) are multiple use. Utility projects outside of a unit designated Transportation Corridor could still occur, consistent with management guidance in the area plan. It is not necessary to call out specific projects.	None.
116	Recreation and Scenic Resources	Page 2-42 Lines 20-22. We appreciate the general concept behind this goal but added to this list should be natural sounds and natural quiet. And there are many places, not just very few, where protecting those resources is appropriate.	Natural sounds and natural quiet are considered to be part of the unique wilderness characteristics of the planning area referenced in this goal.	None.

#	Subject	Issue Summary	Response	Recommended Revision
117	Reservations of Water for Instream Flow	I suggest additional information be included in the plan that details how reservations of water under AS 46.15.145 can be acquired and used along with other AS 46.15 appropriation of water uses to manage Alaska's water resources in the best public interest under AS 46.15.080.	Chapter 2 management guidelines discuss the general considerations for reservations of water and direct the public to submit applications for instream flow reservations to the Division of Mining, Land and Water. More information is available on the DNR webpage at https://dnr.alaska.gov/mlw/water/rights/ .	None.
118	Materials	The Ma - Materials - classification mandates lands remain in state ownership until the material is no longer required for state purposes. This classification needs to have an added provision taking into account the importance of maintaining sand and gravel availability to the general public, not just the state.	Land designated Materials will remain in state ownership until the material on the site is no longer required for state purposes. State purposes include negotiated sales and personal use of materials under AS 38.05.555 is to be retained in state ownership and made available for private and public use. Materials from a source or site designated under AS 38.05.550(b) may be extracted and removed for personal use without cost up to a limit of two cubic yards a person within a one-calendar-year period.	None.
119	Recreation and Scenic Resources	Page 2-42, Lines 11-13. What recreation opportunities serve habitat protection, timber management, and mineral resources? We don't understand this goal.	This goal refers to generally allowed uses under 11 AAC 96.020 and the conditions for generally allowed uses under 11 AAC 96.025. This includes activities such as hunting, fishing, trapping, harvesting wild plants, mushrooms and berries, using dead and down wood for cooking or a warming fire; or recreational gold panning.	None.

#	Subject	Issue Summary	Response	Recommended Revision
120	Recreation and Scenic Resources	Page 2-42 Lines 16-19. This seems to favor “encouraging commercial development of recreational facilities and services” over avoiding “environmental impacts and conflicts with the existing users of an area.” We suggest deleting “minimizing” and instead saying: “Encouraging commercial development... when significant environmental impacts and significant conflicts with the existing users of an area can be avoided.”	Under 11 AAC 96.005 DNR is required to manage uses and activities on state public domain land, including shoreland, tideland, and submerged land, in order to minimize adverse effects on the land and its resources.	None.
121	Recreation and Scenic Resources	Page 2-42 Lines 26-27. Another excellent goal. Page 2-39, lines 11-12. We of course support avoiding “long-term detrimental impact on natural resources.”. Pages 2-39-40. Joint Use and Consolidation of Surface Access. This is only common sense and is very important. We support the plan’s decision to keep most state lands open to mineral entry.	Concur.	None.
122	Mineral Resources/Goals	Page 2-35, lines 12-13: Please substitute, “Provide opportunities through state land management for the exploration and development of mineral	Goals are general conditions that DNR attempts to achieve through management actions. These goals will lay the foundation for maintaining important uses, resources, or activities, and guide	None.

#	Subject	Issue Summary	Response	Recommended Revision
		resources” with “Consider permitting the exploration and development of mineral resources where such activities will not displace long-standing pre-existing uses.”	use and development interests. Guidelines are specific directives that will be applied to land and water management decisions as resource use and development occurs. Siting considerations are addressed by management guidelines and unit specific management intent.	
123	Recreation and Scenic Resources	Page 2-42 line 14-15 addresses the Recreation & Scenic Resources Goal for Recreation Opportunities- the state states it will...”assist communities through cooperative planning, conveyance of state lands, and grants in-aid for parks and trails within population centers”...just how does this process work in an unorganized borough with no local government?	This goal refers to projects that are initiated by communities or private individuals. This plan does not initiate projects. However, this plan does provide recommendations for land to be added to state recreation sites and special use areas in an effort to provide more areas that could be used for tourism and public use sites.	<i>Add language similar to:</i> This area plan does not, itself, initiate any projects.
124	Land Exchanges	Keep language within the plan allowing for land trades between the Federal government and the State.	This plan does not recommend any specific land exchanges, nor does it preclude land exchanges. Land exchanges are adjudicated through a separate and subsequent administrative process under AS 38.50.010.	None.
125	Settlement	2-47. The first goal listed for purposed settlements was to provide for seasonal and recreational purposes. This should change to include year-round and community expansion to be the first priority. Our	The goals are not listed in priority order.	None.

#	Subject	Issue Summary	Response	Recommended Revision
		economic development is not just what the state decides.		
126	Minerals	Page 2-35, lines 15-20: Please insert, instead of “Economic Opportunities”: Management: Manage state lands for efficient and environmentally sound practices, throughout the process, from exploration through development, tailings disposal, reclamation, and any necessary long-term treatment. Ensure that the state has sufficient manpower and financial resources to effectively monitor and enforce its regulations and stipulations. Ensure that exploration and development companies have sufficient bonding to pay for reclamation, any long-term treatment, and cleanup of any spills.	The proposed edits to the goal are already managed under numerous statutes and regulations including AS 38.05.130, 38.05.135-.157, AS 38.05.185, AS 38.05.275, 11 AAC 05.120, 11 AAC 82.600, 11 AAC 85.245, 11 AAC 86.145, and 11 AAC 86.805.	None.
127	Minerals	Page 2-35, lines 23-24: Please substitute, “...protect wildlife, the integrity of the environment, public uses, and affected cultural features to the greatest extent possible. Local offices of Alaska Department of Fish and Game and traditional Native villages	Goals are general conditions that DNR attempts to achieve through management actions. These goals will lay the foundation for maintaining important uses, resources, or activities, and guide use and development interests. Chapter 2 provides additional management guidelines by resource value and unit specific management intent is provided in	None.

#	Subject	Issue Summary	Response	Recommended Revision
		will be consulted on these issues.”	the Resource Allocation Table in Chapter 3.	
128	Wildlife Habitat	Page 2-11, Lines 9 & 10: Please delete “of regional, state, or national significance.” As scientist Aldo Leopold famously wrote, “To keep every cog and wheel is the first precaution of intelligent tinkering.” All of our native species play roles in ecosystems, and we are ignorant of what many of these roles are.	The words “of regional, state, or national significance” are included in the goal because they are expressly called out in the definition of Wildlife habitat land. Under 11 AAC 55.230, wildlife habitat land is land which is primarily valuable for (1) fish and wildlife resource production, whether existing or through habitat manipulation, to supply sufficient numbers or a diversity of species to support commercial, recreational, or traditional uses on an optimum sustained yield basis; or (2) a unique or rare assemblage of a single or multiple species of regional, state, or national significance.	None.
129	Wildlife Habitat	Page 2-11, Line 40: Please conclude the sentence with “when suitable, the continuation of other uses of the area.” Under this plan, designated Habitat areas would comprise only 11% of the total. We can afford to let fish and wildlife have that much.	Management goals, guidelines, and intent are focused on maintaining and enhancing opportunities for public and commercial use of the state lands and waters while considering emerging issues related to climate change and conserving the natural resources and habitats necessary to sustain fish and wildlife populations. Management guidelines identified are intended to provide specific standards, management direction or procedures to be followed by the DNR in the issuance of permits, leases, or other authorizations for the use of state land or resources within the planning area. Guidelines range in	None.

#	Subject	Issue Summary	Response	Recommended Revision
			their level of specificity, from giving general guidance for decision making to identifying specific factors that need to be considered when making on-the-ground decisions. All authorizations for use of state land within the planning area will be consistent with the principles of multiple use and sustained yield and with the management intent in this plan.	
130	Wildlife Habitat	Page 2-12, Lines 3 & 4: Please omit “The cost of mitigation relative to the benefits to be gained will be considered in the implementation of this policy.” The language is vague, and raises the question of “whose cost and whose benefit?”	The cost of mitigation is borne by the applicant. The project is assessed by whether it is in the best interest of the state.	None.
131	Wildlife Habitat	Page 2-12, Lines 31-33: Please insert “or require” after “consider.”	Adding “or require” is unnecessary. This sentence limits consideration to only certain techniques that are effective and beneficial, while providing flexibility to choose the best technique for those specific circumstances. The final sentence of the paragraph requires implementation of the chosen technique.	None.
132	Wildlife Habitat	Page 2-12, Lines 34-36 and Page 2-13, Lines 34-37, Page 2-14, Lines 14-16: Please omit “in the best interest of the state.” The definition of “in the best interest of the state” changes	The best interest of the state is the statutory standard that must be used. AS 38.05.035 outlines the factors that must be considered and included in a written determination that the sale, lease, or other disposal of available land, resources, property, or interests in them is in the best	None.

#	Subject	Issue Summary	Response	Recommended Revision
		from one administration to the next.	interest of the state. Some authorizations have different requirements that are set out in program specific statutes.	
133	Wildlife Habitat	Page 2-13, Line 10: Please add “Bird migration corridors,” both here and in the Glossary. The Mentasta Mountains, Nabesna Road, Copper River, and the Tahnita Pass area of the Glenn Highway are important raptor migration corridors. Over time, important songbird migration corridors will be identified. Structures such as cell phone towers and wind turbines should be sited to avoid these areas. Any lights should be required to be designed to minimize harm to migrating birds of all kinds.	This section in Chapter 2 defines the factors used to create units designated Habitat. These habitats are defined as areas that serve as a concentration area for a single or multiple species of fish and wildlife during a sensitive life history stage or are highly important to the maintenance or management of a single or multiple species of fish or wildlife. Unit specific management intent that directs adjudicators to consult with ADF&G to identify sensitive habitats is listed in the Resource Allocation Table in Chapter 3.	None.
134	Wildlife Habitat	Page 2-13, Line 39: Please add, “removal of surface material and/or underlying strata.”	This language is not intended to be an exhaustive list. If there is a question as to whether a use would be appropriate or whether it would degrade a listed resource, DNR shall consult with ADF&G in making the determination of initial incompatibility.	None.
135	Wildlife Habitat	Page 2-19, Line 39, through Page 2-20, Line 20: These are important requirements for the protection of bird species, many of which (as noted above) are in serious decline. Climate change	Concur.	None.

#	Subject	Issue Summary	Response	Recommended Revision
		is likely to make this situation even worse.		
136	Wildlife Habitat	Page 2-21, Lines 24-26: Please add a statement like this: “Adjudicators must consider whether removing a non-renewable resource such as minerals and materials is worth disturbing or destroying otherwise renewable resources such as plants and animals.	The proposed language is outside of the statutory factors that must be considered when designating a material site or source under a best interest finding as required by AS 38.05.035(e). Mining requirements are addressed in AS 38.05.185-.245.	None.
137	Wildlife Habitat	Page 2-23, Lines 12 and 13: What is deemed “of sufficient public importance” varies from one administration to the next. Fish and wildlife are sustainable resources of public importance; they and their designated harvest areas must be respected. Please delete these two lines.	This section of the plan recognizes that certain authorizations may be needed because they provide an overwhelming public benefit but that does not remove all fish and wildlife protections.	None.
138	Settlement	Page 2-40, lines 27-32. The State should not sell state land unless access that minimizes environmental harm can be identified and can be designated as legal access to the property.	Land must be surveyed prior to disposal under AS 38.04.045. At the time of survey, legal rights-of-way and easements shall be reserved for access under AS 38.04.050-.055, and follow the standards set out in 11 AAC 51. Management guidelines in Chapter 2 direct adjudicators to consider sensitive environmental features, habitat resource areas, and areas (or corridors) used by local residents for recreation purposes as part of subdivision design. Additionally,	None.

#	Subject	Issue Summary	Response	Recommended Revision
			subdivisions should be developed to protect or maintain these features. Vegetated wildlife migration corridors, riparian buffers, and retained open space should also be considered when there is also a high value for fish and wildlife resources in the areas. Subdivisions should be developed to protect or maintain these features. Unit specific management intent is provided in the Resource Allocation Table in Chapter 3.	
139	Wildlife Habitat	Page 2-14, Line 44: Thank you for requiring the maintenance of in-stream flows for fish. Please add “and invertebrates,” which are important food items for both aquatic and terrestrial wildlife.	Invertebrates are included in the statutory definition of fish (AS 16.05.940).	None.
140	Wildlife Habitat	Page 2-17, Lines 19-27: Thank you for stressing the importance of avoiding acoustical or visual disturbance to moose, and for applying the same requirements in your discussion of caribou and Dall’s sheep. Please apply the same to mountain goats.	Concur.	<i>Pg. 2-19 line 3, add text similar to:</i> Authorizations in these areas are to use the same management requirements as those for moose/caribou calving, rutting, and winter concentration areas described above.
141	Public Access	Need a state-designated (public use) site somewhere in C-7 (northern) for people to legally park at Klutina Lake once they've come up the Klutina Lake Rd.	There is no state land available for a public use site along Klutina Lake Road, or along RST 633 Copper Center Valdez Trail. Management intent for Unit C-7 states “Development along Klutina Lake should include a public use site of at least	None.

#	Subject	Issue Summary	Response	Recommended Revision
			six contiguous acres reserved for public access.”	
142	Public Access	Add another route or area within the Tonsina Controlled Use Area, which is already closed for motorized hunting from late July through September.	This is outside of the scope of this plan. Controlled Use Areas are established by ADF&G and restrictions on motorized use or use of pack animals is limited to hunting. Generally Allowed Uses under 11 AAC 96.020 are not restricted in Controlled Use Areas.	None.
143	Public Access	Close H-1, H-4, H-51A, H-51B, H-52, H-53, H-54, H-60, H-63, H-7, H-8, M-2, M-3, M-3, W-1, W-7, W-14, W-16, W-17, and W-20 to motorized vehicles.	Motorized vehicles, subject to curb weight limitations, are a Generally Allowed Use under 11 AAC 96.020. However, Unit H-7 is a Special Use Area under 11 AAC 96.014(24) and has special permitting requirements for motorized use.	None.
144	Public Access	Designate non-motorized routes or trails in the Nelchina Public Use Area.	The Nelchina PUA is outside of the planning area boundary.	None.
145	Public Access	McCarthy Road is in need of improvements and straightening.	This plan does not authorize specific projects. DOT/PF is the agency responsible for maintaining and improving roadways.	None.
146	Public Access	The plan emphasizes access as a priority, and its focus is primarily on reserving access when selling land. Use patterns are changing, our population is growing and tourism is increasing. The State needs to acquire access over private or	The goal of public access is defined in the plan as providing access to public and private lands and resources to ensure adequate opportunities for the use of public resources. Chapter 2 lists goals and management guidelines for general public access and access within and between developing areas. Unit specific	None.

#	Subject	Issue Summary	Response	Recommended Revision
		other government land in order to reach state lands. Example: Access to the Copper River for nonmotorized boaters, with launch facilities and parking, would provide better access for Alaskans, as well as for tourists.	management intent is in the Resource Allocation Table in Chapter 3.	
147	Public Access	Are the trails through the area public access over state lands, native lands, and private property or just over state lands?	There are a number of trails/easements that provide access to state lands, over state land, over Alaska Native lands, federal lands and private property. These include section line easements, RS 2477 rights-of-way, AS 38.05.127 to and along easements for navigable and public waters, Alaska Native Claims Settlement Act 17(b) easements, access corridors, and public use easements.	None.
148	Public Access	There is much discussion in the plan regarding the protection of public access. The proposed solution, according to ADNR, is section line easements. Relying on section line easements to provide access to state land fails to protect public access. Most section line easements that the state has established aren't on dry ground or useable. The state should start looking at all access easements (section line, 17b, RS, RS2477 etc.) on-the-ground before designating them.	The plan identifies multiple access options available throughout the planning area. Chapter 2 management guidelines direct DNR to improve or preserve public access to areas with significant public resource values by retaining access sites and corridors in public ownership; reserving rights of access when state land is sold or leased; or identifying, managing and legally validating RS 2477 rights-of-way. DNR shall preserve potential access routes to developing areas but is not required to build or maintain roads. Section line easements are to be preserved but should not be relied on for	None.

#	Subject	Issue Summary	Response	Recommended Revision
			access to and within land offerings without field inspection of the practicality of such routes, where topography or other conditions might make the practicability of the section line location suspect.	
149	Public Access	Public access around TAPS was an issue in 1986 and remains an issue. The plan needs to address the issues identified in the 1986 plan. For example: A. Future pipeline must have more crossings. B. State needs to Work with Alyeska Pipeline Service Company (APSC) to allow crossing (APSC should be mandated to work with the state). C. Public may not travel parallel to right of way (DNR permit?). D. From a recreational standpoint the 1500 lb. limit needs to be increased as off-road recreational vehicles have improved (got heavier as well).	This is beyond the scope of this plan. Pipeline crossings are defined in the terms of the lease. With regard to TAPS, pipeline crossings, access, concurrent use, and the requirement to have a permit to travel parallel to the right-of-way are included in the terms and stipulations in the 1974 Right-of-Way Lease for the Trans-Alaska Pipeline, which is still a valid lease agreement. The Pipeline Coordinator has the authority to negotiate new terms as they see fit. The recreational-type off-road or all-terrain vehicle curb weight limit of up to 1500 pounds is set out in 11 AAC 96.020, Generally Allowed Uses. Modifying the weight limit is not recommended in this plan, so the modification would require a change to the regulation through a subsequent and separate administrative process.	None.
150	Public Access	The plan talks at length regarding protecting public access to water bodies through the use of public easements, access easements, buffers, etc., when remote lands are sold.	When notified, DNR reviews reports of trespass, encroachment, and areas where public access has been blocked, and will take steps to remedy the issue.	None.

#	Subject	Issue Summary	Response	Recommended Revision
		Does DNR follow up land sales to ensure that the required buffers and easements have been implemented and are being respected by the owner?		
151	Public Access	I am in support of the revision plan, as long as the privatization of the land does not continue to limit public access. Private ownership has made it quite difficult to truly experience the area. One must pay a fee that varies from person to person and business to business, based on the relationship or opinion of the landowner who has put in a vehicle bridge over both the Kennicott River and the McCarthy. I have observed the banks of the McCarthy River being dug out by large construction machines, forcing all to use the private bridge at a cost.	Under AS 38.04.050 and 11 AAC 51.015, prior to selling, leasing, or otherwise disposing of the land estate, DNR must survey land, provide legal access to private land, and reserve public use easements. A right-of-way or easement shall be located to ensure adequate and feasible access for the purposes for which the right-of-way or easement was intended.	None.
152	Public Notice	Notify Chugach Alaska Corporation (CAC) of any future material site projects near mile 1 of the Edgerton Highway.	This is outside the scope of the plan. Material site and sale authorizations are managed under AS 38.05.550 and are part of a separate and subsequent administrative process.	None.
153	Scenic Highway	Requesting a scenic highway designation for the Richardson Highway.	The plan does not recommend designating any scenic highways or byways. Interested parties may file an	None.

#	Subject	Issue Summary	Response	Recommended Revision
			application with DOT/PF to nominate a route as a scenic byway.	
154	Thompson Pass Special Use Area	It is unclear from this plan what the recreation, commercial recreation, and economic activities are and how they would be managed. How are permitting and other decisions regarding the Thompson Pass Special Use Area made? Will there be an opportunity to comment on proposed uses?	There are no restrictions on Generally Allowed Uses under 11 AAC 96.020 in the Thompson Pass Special Use Area. Proposed uses beyond those covered under the GAUs are authorized through a separate and subsequent administrative process subject to program specific public notice requirements. The plan sets out goals and management guidelines for recreation and access in Chapter 2. Unit specific management intent for the Thompson Pass Special Use Area can be found in Chapter 3 in Units H-63, M-3, and H-64-70 for State Recreation Sites and other infrastructure authorized within the SUA.	None.
155	Setback/Buffers	Shorelines and Stream Corridors have proposed riparian buffer of at least 100' and "... preferable to retain larger widths..." adjacent to Anadromous or High Value Resident Fish. The right-of-way went from 50' to 200'. A 200 or more right-of-way should not be allowed – there is no basis for changing this.	Chapter 2 goals and management guidelines details the minimum requirements for easements, riparian buffers, setbacks, and other protective measures for activities in/around shorelands and stream corridors. DNR can increase the width or amount of state land retained based on specific site characteristics or the importance of the habitat or resources to be protected.	None.
156	Setback/Buffers	In addition to lack of management of waste removal planning is a question of water	See chapter 2's Shorelands and Stream Corridors for building setback information.	None.

#	Subject	Issue Summary	Response	Recommended Revision
		quality and habitat quality for salmon in the region. Building directly on the banks of salmon streams can have detrimental effects on water quality, especially when there is a lack of waste disposal accessibility. It would be safer for salmon and safer for residents that wish to settle in W-16 if there were land evaluations in place that could help select lands that are helping to support erosion reductions, that are supporting important salmon streambank health, that are corridors for wildlife and have important cultural uses for local residents for subsistence.		
157	Wildlife Habitat	Page 3-67, Unit H-5: Three materials sites are clustered near “Hungry Hollow” (the watercourse that includes Octopus Lake). Please reflect that Hungry Hollow is anadromous.	Concur.	<i>Change text in Resources and Uses from: Fish Creek is anadromous to the following or similar: Fish Creek and Hungry Hollow Creek are anadromous.</i>
158	Region Description/ Chugach Mountains Region	3-122, Line 17: Please add Wortman’s and Bear Creek to the anadromous waters listed under Resources and Uses.	Concur.	<i>Add language similar to: ... Greyling, Quartz, Wortman’s and Bear Creeks.</i>
159	Public Access/Trails	The Kenny Lake trail along the north side of the Tonsina River gorge should be recognized and	The plan does recognize this trail as RST 1747 & RST 1413 in the resource allocation table in chapter 3. Chapter 2	None.

#	Subject	Issue Summary	Response	Recommended Revision
		conserved in the CRBAP. The section of trail recommended here for protection includes the bluff area south of Kenny Lake School extending eastward roughly two miles.	provides management guidelines for the protection of trails consistent with the scope of this plan.	
160	Subsistence	Page 2-11, Line 31: Add language to chapter 2 recognizing the importance of subsistence activities.	Concur. Subsistence use is an important land use and should be addressed in Chapter 2. Unit specific guidance and information in Chapter 3 remains unchanged.	<i>Add section with language similar to:</i> Subsistence and Harvest Subsistence use describes the customary and traditional uses of wild, renewable resources for direct personal or family use or consumption, such as food, shelter, fuel, clothing, tools, or transportation. Subsistence use also includes the making and selling of handicrafts made from nonedible byproducts of fish and wildlife resources taken for personal or family consumption and for barter. Subsistence is a vital part of life throughout the Copper River Basin, and a high diversity of fish, game, and other wild resources are harvested using regionally and seasonally distinct practices and activities as part of the region's subsistence culture. Many such practices are deeply rooted in cultural traditions central to the region's Indigenous communities. Residents commonly hunt moose as a key wild food source along major roads and rivers; subsistence fishers along the

#	Subject	Issue Summary	Response	Recommended Revision
				Copper River and other rivers in the planning area rely heavily on salmon (Sockeye, Chinook, Coho, Chum, and Pink salmon); and residents throughout the region harvest these and other anadromous fish (e.g., Dolly Varden, whitefish) and non-migratory species (e.g., Arctic grayling, burbot, northern pike).
161	Wildlife Habitat	Page 2-16, Line 7: Update text to include Golden Eagles to improve accuracy.	Concur.	<i>Change language from:</i> the Bald Eagle Protection Act <i>to:</i> the Bald and Golden Eagle Protection Act
162	Wildlife Habitat	Page 2-16, Line 32: Update text to include Golden Eagles to improve accuracy.	Concur.	<i>Change language from:</i> bald eagle nest site <i>to:</i> bald eagle or golden eagle nest site
163	Wildlife Habitat	Page 2-17 and 2-19, Line 5: Add language recognizing the importance of salmon to the region.	Concur. This section was inadvertently omitted from the Public Review Draft (PRD) and should be included in the plan.	<i>Add section with language similar to:</i> Salmon. Salmon are deeply significant to the culture and ecology of the Copper River Basin. For thousands of years, Indigenous peoples of the region have relied on salmon as a vital food source and as a cornerstone of cultural traditions, ceremonies, and subsistence practices. Salmon remain central to the diet, identity, and heritage of the region's human communities, and they are a keystone species of the region's ecosystem and nutrient cycle, supporting diverse wildlife and enriching river and forest ecosystems. Salmon are essential for subsistence,

#	Subject	Issue Summary	Response	Recommended Revision
				commercial, and sport fisheries, sustaining both cultural lifeways and local economies. Chinook salmon returning to the Copper River drainage migrate through the Copper River Delta and begin to enter the Copper River in early May, with peak abundance in the Lower Copper River from mid-May to mid-June. This migration is mostly complete by July 1 but continues in low abundance through August. Chinook salmon migrate to spawning areas in the Upper Copper River tributaries throughout June and July and spawning occurs in mid-July through August.
164	Technical Correction	Page 2-27, Line 28: Replace “local biologist” with the text consult with ADF&G.	Concur.	<i>Change language from:</i> consult with ADF&G’s local biologist <i>to:</i> consult with ADF&G
165	Forestry	Page 2-27, Line 34: add a dedicated wetlands management section to reflect the importance of this environment and habitat, as seen in the 1986 plan and the 2021 North Slope Plan.	Portions of the suggested language, in addition to a reference to the statutes that outline state requirements and standards for development in wetland areas/riparian zones, should be added to provide clarity. References to recreation are omitted because they are addressed in a different section and are out of context in this location.	<i>Add Section with language similar to:</i> Protection of Wetlands. Wetlands are sensitive environmental features and among the most productive in preserving the state’s biological diversity. Areas with important hydrologic, habitat, or recreational values and adjacent buffer strips will be retained for open space. Systems of publicly owned land will be designed to provide the necessary linkage and continuity to protect or increase values for human uses and wildlife

#	Subject	Issue Summary	Response	Recommended Revision
				movements. In some places, large areas may be retained to provide adequate terrestrial habitat. AS 41.17.115 – 118 and AS 41.17.950.
166	Transportation and Infrastructure	Page 2-65, Lines 40-42: Update text to clarify that a crossing in any fish-bearing stream may require a permit from ADF&G.	Concur.	<i>Change language from:</i> Crossings in specified anadromous fish streams or construction of a structure crossing a specified anadromous stream... <i>to the following or similar:</i> Crossings in any fish-bearing stream or construction of a structure crossing any fish-bearing stream...
167	Region Description/Northern Regions	Page 3-22, Line 27: Add the following language to be more inclusive of species in the area: Wetlands serve as breeding habitat for migratory songbirds and small mammals considered in the State Wildlife Action Plan. Other wildlife with a range occurring within the boundaries of the plan area that are excluded from unit inventories (unless identified as Species of Greatest Conservation Need in the State Wildlife Action Plan) include bats, beavers, bison, coyotes, lynx, ermine, fox, hare, marmot, marten, mink, muskrat, pika, porcupine, squirrels, voles, wolves, wolverine, and numerous bird species. Update	Most of the proposed language will help to improve accuracy and should be included. The language "...considered in the State Wildlife Action Plan." and "...within the boundaries of the plan area that are excluded from unit inventories (unless identified as Species of Greatest Conservation Need in the State Wildlife Action Plan)..." will not be included as part of this revision because information regarding sensitive species is dynamic and the State Wildlife Plan is a 10 year plan that is static. This plan was developed with the best available information at that time and recognizes that conditions may change throughout the life of the plan, which is why the plan directs adjudicators to consult with ADF&G to obtain current information regarding sensitive habitats and species.	<i>Change language/Add section similar to:</i> Wetlands are breeding habitat for migratory songbirds and small mammals. Other wildlife with a range occurring within the planning area include bats, beavers, coyotes, lynx, ermine, fox, hare, marmot, marten, mink, muskrat, pika, porcupine, squirrels, voles, wolves, wolverine, and numerous bird species.

#	Subject	Issue Summary	Response	Recommended Revision
		text to provide additional information.	Including this language would limit DNR's ability to make decisions based on current conditions.	
168	Region Description/Northwest Region	Page 3-34, Line 34: Add the following language to be more inclusive of species in the area: Wetlands serve as breeding habitat for migratory songbirds and small mammals considered in the State Wildlife Action Plan. The region contains a portion of the ADF&G's Sourdough Controlled Use Area and Paxson Closed Area. Other wildlife with a range occurring within the boundaries of the plan area that are excluded from unit inventories (unless identified as Species of Greatest Conservation Need in the State Wildlife Action Plan) include bats, beavers, bison, coyotes, lynx, ermine, fox, hare, marmot, marten, mink, muskrat, pika, porcupine, squirrels, voles, wolves, wolverine, and numerous bird species. Update text to provide additional information.	Most of the proposed language will help to improve accuracy and should be included. The language "...considered in the State Wildlife Action Plan" and "...within the boundaries of the plan area that are excluded from unit inventories (unless identified as Species of Greatest Conservation Need in the State Wildlife Action Plan)..." will not be included as part of this revision because information regarding sensitive species is dynamic and the State Wildlife Plan is a 10 year plan that is static. This plan was developed with the best available information at that time and recognizes that conditions may change throughout the life of the plan, which is why the plan directs adjudicators to consult with ADF&G to obtain current information regarding sensitive habitats and species. Including this language would limit DNR's ability to make decisions based on current conditions.	<i>Change language/Add section similar to:</i> Page 3-34 Line 34 Wetlands are breeding habitat for migratory songbirds and small mammals. Other wildlife with a range occurring within the boundaries of the plan area include bats, beavers, coyotes, lynx, ermine, fox, hare, marmot, marten, mink, muskrat, pika, porcupine, squirrels, voles, wolves, wolverine, and numerous bird species. The region contains a portion of the ADF&G's Sourdough Controlled Use Area and Paxson Closed Area.

#	Subject	Issue Summary	Response	Recommended Revision
169	Region Description/Central Region	Page 3-50, Line 43: Add: Wetlands serve as breeding habitat for migratory songbirds and small mammals considered in the State Wildlife Action Plan. Update text to provide more information.	Most of the proposed language will help to improve accuracy and should be included. The language "...considered in the State Wildlife Action Plan." will not be included as part of this revision because information regarding sensitive species is dynamic and the State Wildlife Plan is a 10 year plan that is static. This plan was developed with the best available information at that time and recognizes that conditions may change throughout the life of the plan, which is why the plan directs adjudicators to consult with ADF&G to obtain current information regarding sensitive habitats and species. Including this language would limit DNR's ability to make decisions based on current conditions.	<i>Change language/Add section similar to:</i> Page 3-50 Line 43 Wetlands serve as breeding habitat for migratory songbirds and small mammals.
170	Wildlife Habitat/Region Description/Central Region	Page 3-50, Line 45: Add the following language to be more inclusive of species in the area: Other wildlife with a range occurring within the boundaries of the plan area that are excluded from unit inventories (unless identified as Species of Greatest Conservation Need in the State Wildlife Action Plan) include bats, beavers,, coyotes, lynx, ermine, fox, hare, marmot, marten, mink, muskrat, pika, porcupine, squirrels, voles, wolves, wolverine, and	Most of the proposed language will help to improve accuracy and should be included. The language "...considered in the State Wildlife Action Plan." and "...within the boundaries of the plan area that are excluded from unit inventories (unless identified as Species of Greatest Conservation Need in the State Wildlife Action Plan)..." will not be included as part of this revision because information regarding sensitive species is dynamic and the State Wildlife Plan is a 10 year plan that is static. This plan was developed with the best available information at that time and recognizes	<i>Add language similar to:</i> Other wildlife with a range occurring within the boundaries of the plan area include bats, beavers, coyotes, lynx, ermine, fox, hare, marmot, marten, mink, muskrat, pika, porcupine, squirrels, voles, wolves, wolverine, and numerous bird species.

#	Subject	Issue Summary	Response	Recommended Revision
		numerous bird species. Update text to provide more information.	that conditions may change throughout the life of the plan, which is why the plan directs adjudicators to consult with ADF&G to obtain current information regarding sensitive habitats and species. Including this language would limit DNR's ability to make decisions based on current conditions.	
171	Wildlife Habitat/Region Description/Glenn/ Richardson Region	Page 3-63, Line 4: Add the following language to be more inclusive of species in the area: Given the region's extensive coverage throughout the planning area many different habitats exist. Introduced Plains Bison (Copper Basin herd) can be found in the central area across the Copper River from near Copper Center and Kenny Lake (a few do wander occasionally into the latter community at times). This herd has grown to a maximum of ~250 animals and expanded its range as the herd grew. Caribou herds range across the whole central and northern parts of the region. Moose and Caribou calving and rutting occur in the central, western, and northwestern portions of the region. Dall sheep and goat inhabit the Chugach Mountains	Most of the proposed language will help to improve accuracy and should be included. The language "...considered in the State Wildlife Action Plan." and "...within the boundaries of the plan area that are excluded from unit inventories (unless identified as Species of Greatest Conservation Need in the State Wildlife Action Plan)..." will not be included as part of this revision because information regarding sensitive species is dynamic and the State Wildlife Plan is a 10 year plan that is static. This plan was developed with the best available information at that time and recognizes that conditions may change throughout the life of the plan, which is why the plan directs adjudicators to consult with ADF&G to obtain current information regarding sensitive habitats and species. Including this language would limit DNR's ability to make decisions based on current conditions.	<i>Replace the text:</i> Given the extensive [...] lake trout. <i>with the following text or similar:</i> Given the region's extensive coverage throughout the planning area many different habitats exist. Introduced Plains Bison (Copper Basin herd) can be found in the central area across the Copper River from near Copper Center and Kenny Lake. This herd has grown to a maximum of ~250 animals and expanded its range as the herd grew. Caribou herds range across the whole central and northern parts of the region. Moose and Caribou calving and rutting occur in the central, western, and northwestern portions of the region. Dall sheep and goat inhabit the Chugach Mountains in the Thompson Pass area. Brown and black bears range throughout the area. Moose may be found anywhere below 4,000 feet but are most commonly found in brushy areas or marshy areas where food is abundant. Trumpeter Swan can be found here during summer and breeding habitat can be found throughout.

#	Subject	Issue Summary	Response	Recommended Revision
		in the Thompson Pass area. Brown and black bears range throughout the area. Moose may be found anywhere below 4,000 feet but are most commonly found in brushy areas or marshy areas where food is abundant. Trumpeter Swan can be found here during summer and breeding habitat can be found throughout. Wetlands serve as breeding habitat for migratory songbirds and small mammals considered in the State Wildlife Action Plan. A variety of fish populations are found throughout the region. In the Copper River drainage, lakes along the Chitna-McCarthy Road contain Dolly Varden, sockeye salmon, coho salmon, grayling, lake trout, and burbot. Along the Nabesna Road, there are several lakes which provide recreational angling for grayling, burbot, and lake trout. Other wildlife with a range occurring within the boundaries of the plan area that are excluded from unit inventories (unless identified as Species of Greatest Conservation Need in		Wetlands serve as breeding habitat for migratory songbirds and small mammals. A variety of fish populations are found throughout the region. In the Copper River drainage, lakes along the Chitna-McCarthy Road contain Dolly Varden, sockeye salmon, coho salmon, grayling, lake trout, and burbot. Along the Nabesna Road, there are several lakes which provide recreational angling for grayling, burbot, and lake trout. Other wildlife with a range occurring within the boundaries of the plan area include bats, beavers, coyotes, lynx, ermine, fox, hare, marmot, marten, mink, muskrat, pika, porcupine, squirrels, voles, wolves, wolverine, and numerous bird species.

#	Subject	Issue Summary	Response	Recommended Revision
		the State Wildlife Action Plan) include bats, beavers, coyotes, lynx, ermine, fox, hare, marmot, marten, mink, muskrat, pika, porcupine, squirrels, voles, wolves, wolverine, and numerous bird species. Update text to include more detail.		
172	Management Intent/Wildlife Habitat	Add consideration and consultation language to ensure that sensitive habitats are addressed in Units N-2, N-3, N-4, O-2, O-4, O-6, O-10, O-11, C-1, C-4, C-5, C-7, C-9, H-4, H-9, H-10, H-16, H-31, H-32, H-37, H-38, H-41, H-45, H-49, H-57, H-60, H-63, W-1, W-2, W-3, W-4, W-6, W-7, W-8, and M-2.	Concur in part. Units N-3, N-4, O-2, O-4, O-6, O-10, O-11, C-1, H-4, H-57, H-63, W-8, and M-2 already have language regarding consultation with ADF&G.	<i>Include with Management Intent for units C-4, H-9, H-10, H-16, H-31, H-32, H-37, H-38, H-41, H-45, H-49, H-60, W-1, W-2, W-3, W-4, W-6, and W-7 language similar to:</i> Adjudicators shall consult with ADF&G to identify sensitive habitat areas prior to issuing an authorization. <i>Include with Management Intent for units N-2, C-5, C-7, C-9, language similar to:</i> Adjudicators should consult with ADF&G to identify sensitive habitat areas prior to issuing an authorization.
173	Management Intent/Wildlife Habitat	Page 3-55, Unit C-7: Add consideration and consultation language to ensure that sensitive moose habitat is addressed.	Concur.	Page 3-55 Unit C-7, <i>Change/add language in the Management Intent similar to:</i> Adjudicators shall consult ADF&G regarding authorizations involving uses that may impact moose calving and rutting areas.
174	Wildlife Habitat	Page 3-56, Unit C-8: Add consultation and advisement language concerning fish streams.	The management intent for this unit already contains this language.	None.

#	Subject	Issue Summary	Response	Recommended Revision
175	Wildlife Habitat	Page 3-81, H-60, note Controlled Use Areas where they occur.	Concur in part. Controlled Use Areas are recognized in the Region Descriptions and not in specific units. The Tonsina Controlled Use Area should be added to the Glenn/Richardson Region Description.	Page 3-63, Line 14: <i>Add language similar to:</i> A portion of the Tonsina Controlled Use Area is within the region.
176	Wildlife Habitat	Page 3-107, Unit W-7; Page 3-124 Unit M-1, and Page 3-125 Unit M-3: Please update unit information to include mineral licks without specifying the exact location. Add consultation language to contact ADF&G if location details are needed.	Concur. Mineral licks are relevant to units' resources and uses, and their exact locations are not required in the plan.	<i>Add text in Resources and Uses similar to:</i> There are mineral licks within this unit. Contact ADF&G for specific location.
177	Technical Correction	Change references to "goats" throughout the plan to "mountain goats".	Concur.	<i>Change as indicated throughout the plan.</i>
178	Technical Correction	Update all references of "ADF&G Division of Habitat" to "ADF&G Habitat Section".	Concur.	<i>Change as indicated throughout the plan.</i>
179	Wildlife Habitat	Page 2-13, Line 7: Add: rutting and winter habitat, and kidding/nursery areas.	Concur. Addition is appropriate to capture sensitive life stages.	<i>Add/Change language similar to:</i> Mountain goat rutting and winter habitat, and kidding/nursery areas.
180	Wildlife Habitat	Page 2-13, Line 10: Add: Other waterfowl nesting and molting areas, and areas important for waterfowl migration. In too many units to list, migratory waterfowl habitat should be added.	It is inappropriate to add this language as proposed because a general reference to "other waterfowl nesting and molting areas" was not one of the categories used, to identify Habitat designations. The plan already has management guidelines in Chapter 2 and unit specific management	None.

#	Subject	Issue Summary	Response	Recommended Revision
			intent in Chapter 3 that address migratory waterfowl.	
181	Shorelands	Page 3-11, Line 10: Revise language to include resident fish streams.	Concur.	<i>Add/change language similar to:</i> “...anadromous, potentially anadromous, or resident fish stream”.
182	Region Description/Northern, Northwest, and Central Regions	Page 3-22, Line 22; Page 3-33 Lines 15-16 (or Page 3-34 line); Page 3-50, line 31: Include bear occurrence to improve the accuracy of the resource information.	Concur. A review of the resource data confirms black bear occurrence consistent with the proposed language/locations.	Page 3-22 line 22, <i>Add language similar to:</i> Black bear occur in the western area. Page 3-50 line 31, <i>Replace language:</i> ...Klutina Rivers. <i>with the following or similar:</i> ...Klutina Rivers, and black bear occur in the area. Page 3-34 line 28, <i>Replace language:</i> ... near the banks of the Gulkana River. <i>with the following or similar:</i> ... near the banks of the Gulkana River, and black bear occur throughout the area.
183	Classification	Page 3-28, Unit N-7: Change designation to Ha (Habitat) and Hv (Harvest).	Resource management is the appropriate designation/classification for this unit. This unit is made up of three remote parcels in a mountainous area with rugged terrain and current demand implies that development is not likely to occur within the next 10 years.	None.
184	Wildlife Habitat	Update locations where caribou calving occurs.	Concur in part. ADF&G provided updated information on caribou calving that was reviewed and cross-referenced with the resource information listed in the	<i>Remove caribou calving from Resources and Uses for Units C-1, C-2, H-1, H-2, H-4, H-5, H-7, H-8, H-9, H-10, H-12, H-16, H-21, H-22, H-23, H-24, H-27, H-28, H-</i>

#	Subject	Issue Summary	Response	Recommended Revision
			plan. There was a significant change in calving locations, and it is important to reflect that in the plan. Units H-11, H-13, H-14, H-15, H-17, H-18, H-19, H-20, H-25, H-26, H-30, H-33, H-37, N-6, O-5, O-7, and O-12 did not include caribou calving information in the PRD and did not require an update.	29, H-31, H-32, H-41, N-3, N-5, N-7, O-2, O-3, O-4, O-6, O-9, O-10, O-11, W-1, W-2, and W-3.
185	Wildlife Habitat	Page 3-41, Unit O-12: Add consideration and consultation language regarding sensitive moose habitats.	It is not necessary to add the proposed consultation language. Resource data indicates Unit O-12 does not contain sensitive moose habitats.	None.
186	Wildlife Habitat	Page 3-69 Unit H-10 Change to Rd, Ha.	Concur in part. A review of the resource data indicates wildlife categories present that are consistent with a habitat designation.	Update Designation from: Resource Management (Rm) to: Wildlife Habitat (Ha).
187	Management Intent	Units C-4, C-9, N-3, N-5, N-7, O-2, O-4, O-11, H-9, H-31, H-37, H-41, H-44, H-45, H-54, H-60, H-63, W-2, W-3, W-4, W-6, W-7, and M-2. Please remove unit management intent language: "Authorizations are not to be considered appropriate unless necessary for public health, safety or recreation." This is too restrictive and complicates adjudicators' jobs when considering issuing authorizations.	Concur. Language should ensure that adjudication is based on information in the applications and real time data consistent with statutory and administrative requirements.	Unit(s) C-4, C-9, N-3, N-5, N-7, O-2, O-4, O-11, H-9, H-31, H-37, H-41, H-44, H-45, H-54, H-60, H-63, W-2, W-3, W-4, W-6, W-7, M-2, remove/omit language: Authorizations are not to be considered appropriate unless necessary for public health, safety or recreation.

#	Subject	Issue Summary	Response	Recommended Revision
188	Management Intent	Why does the management intent for Units N-1, N-2, N-3, N-5, N-6, N-7, O-2, O-4, O-11, C-2, C-3, C-4, C-5, C-8, C-9, H-4, H-10, H-12, H-15, H-16, H-23, H-31, H-37, H-41, H-45, H-49, H-52, H-60, W-1, W-2, W-3, W-4, W-6, W-7, W-9, W-10, W-20, M-1, M-2 include the language “Retain in state ownership”?	DNR is statutorily required to identify and retain land in public ownership as part of the planning process. Public interests in retaining state land include making land available on a sustained-yield basis for a variety of beneficial uses and protecting critical wildlife habitat and areas of special scenic, recreational, scientific, or other environmental concerns. The plan identifies land that is to be retained through the designation or unit specific management intent. Applicable designations include Forestry, Habitat, Public Recreation -Dispersed, or Public Facilities-Retain. Lands to be retained include: Unit N-6 is designated Pr (Public Facilities-Retain) and subject to the terms of the Management Agreement for the Mentasta Lake School Site. Units N-3, O-2, H-4, H-16, H-31, H-41, H-52, H-60 are designated Rd (Public Recreation-Dispersed and Ha (Habitat). Unit N-5 is designated Ha (Habitat) and Hv (Harvest). Units O-4 and W-7 are designated Ha (Habitat), Hv (Harvest), and Rd (Public Recreation-Dispersed).	<i>Remove directive to retain in state ownership from units N-1, N-6, N-7, C-3, C-4, C-5, C-9, H-10, H-12, H-23, H-45, H-49, W-1, W-2, W-3, W-6, W-20, and M-1.</i>

#	Subject	Issue Summary	Response	Recommended Revision
			Units O-11 and M-2 are designated Ha (Habitat). Units C-8 and W-9 are designated F (Forestry). Unit W-10 is designated F (Forestry) and Rd (Public Recreation-Dispersed). Unit C-2 is designated F (Forestry) and Ha (Habitat). Units C-3, C-8, H-15, H-16, H-37, and W-4 are designated Rd (Public Recreation-Dispersed). A review of the resource data confirms that Units N-1, N-6, N-7, C-3, C-4, C-5, C-9, H-10, H-12, H-23, H-45, H-49, W-1, W-2, W-3, W-6, W-20, and M-1 do not need to be retained.	
189	Management Intent	Units O-11, H-9, H-37, W-7: Please remove the language “to be managed to protect in an undisturbed, natural state”. Does that mean nothing would ever happen in that area? This seems restrictive and the implementation isn’t clear.	Concur. Language should ensure that adjudication is based on information contained in the applications and real time data consistent with statutory and administrative requirements.	<i>Remove/omit the language from the revised Management Intents of units O-11, H-9, H-37, and W-7.</i>
190	Technical Correction	Chapter 3 the definition for Rp - Public Recreation and Tourism-	Concur.	<i>Delete the occurrence of Rp on Page 3-7 lines 20-32.</i>

#	Subject	Issue Summary	Response	Recommended Revision
		Public Use Site is listed twice. One should be removed.		
191	Classification	Page 3-73, Unit H-30: Please review the classification for Unit H-30. It looks like it is part of an existing subdivision.	A review of the land status and resource information indicated that these are surveyed lots that were part of a prior land sale offering for the Glennallen/Copper Center/Willow Creek Disposal Area. These lots are appropriate for disposal and should be classified Settlement.	<i>Change unit Designation from:</i> H-30 Rs (Reserved Use) <i>to:</i> H-30 Se (Settlement) <i>Replace existing text in Management Intent with language similar to:</i> This unit is comprised of multiple surveyed parcels included in prior land sales. Nearly all of the lots that were part of a state subdivision have been conveyed out of state ownership, although some remain. Lands within the unit are appropriate for disposal within the planning period consistent with prior offerings. New development is to conform to the management guidelines provided in the Settlement section of Chapter 2.
192	Materials	Page 2-31, Line 35: Remove the word “alternative” and add consultation language.	Concur.	<i>Replace:</i> ...feasible public upland alternative exists. <i>with:</i> ...feasible public upland exists and ADF&G is consulted.
193	Classification	Please review the classification for Unit M-2. This is an important subsistence area and that should be recognized in the designation.	A review of the resource data indicates subsistence uses present that are consistent with Ha (Habitat) and Hv (Harvest) designation, which converts to the classification Wildlife Habitat Land.	<i>Change unit Designation from:</i> M-2 Ha (Wildlife Habitat) <i>to:</i> M-2 Ha, Hv (Wildlife Habitat, Harvest)

#	Subject	Issue Summary	Response	Recommended Revision
				<i>Replace existing language in Management Intent with the following or similar:</i> Unit is to be managed for its habitat and subsistence resources. Retain in state ownership. Adjudicators shall consider siting requirements that avoid or minimize impacts to habitat and conform to the management guidelines set out in Chapter 2. Adjudicators shall consult with ADF&G to identify sensitive habitat prior to issuing an authorization. Protect known heritage sites and cultural resources. Authorizations that may impact RS 2477 routes should ensure access is maintained. This unit contains mixed land ownership. <i>Change language in Resources and Uses from:</i> Subsistence activities [...] northeast of the unit. <i>to the following or similar:</i> Subsistence activities in the unit include the hunting of black bear, moose, caribou, and upland game birds.