

July 31, 2008

Merry Johnson
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Suite 1050
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Ms. Johnson,

On behalf of the Board of Directors and over 300 members of the Denali Citizens Council (DCC), I am submitting public comments on the state of Alaska Department of Natural Resources (DNR) Preliminary Decision (PD) to convey approximately 24,821 acres to the Denali Borough as part of its municipal land entitlement, and on the state's Draft Tanana Basin Area Plan (TBAP) Amendment.

DCC has been involved in this process for a number of years, communicating both with the state and with the Denali Borough. Our members include local citizens who live and work at the gateway to Denali National Park and Preserve. Our membership also includes state and nationwide citizens who favor careful management of the park and its gateway lands. We support the Municipal Land Entitlement Process as a way for young boroughs to acquire a land base. However, we oppose the proposed conveyances in **some areas**.

1. General Considerations about the process

a. Significance of this action and state's interest in retaining lands in public ownership

It is appropriate and necessary that the Preliminary Decision and Plan Amendment be submitted to public scrutiny. Many of the lands in question have public significance by their proximity to Denali National Park and Preserve and their longstanding public use by a diverse group of constituents. This history of public use and significance could be adversely impacted by changes in TBAP management classification and conveyance to the Denali Borough. The state must consider the real possibility of future impacts, especially since the state may ultimately be responsible for mitigating such impacts.

AS 38.04.015, Public interest in maintaining land in public ownership, (attached), provides compelling arguments to retain certain lands with high value for multiple use, critical habitat or need for comprehensive management. In general, those lands that have been classified PUR (Public Recreation) by TBAP should be retained in public ownership to satisfy the multiple use and comprehensive planning elements of the above statute. Details will be presented in our comments.

b. Purposes of land conveyance under AS 29.65, General Grant Land

DCC agrees that granting of lands from the state of Alaska to the Denali Borough is a statutory duty

DCC Board

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Anne Beaulaurier
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to convey a “vested property right.” However, the statutes have allowed for a public process to examine, in detail, whether it is better to retain these lands in public ownership or convey them to a municipality. The director (under *Sec.29.65.050 Fulfillment of land entitlements*) may disapprove a selection if “the public interest in retaining state ownership of the land outweighs the municipality’s interest in obtaining the land.” We urge you to listen to comments from the public with this in mind.

Both the purpose of the Municipal Entitlement process under *AS 29.65* and the particular circumstances of the local municipality (the Denali Borough) require that the state examine carefully whether conveyance will be in “the public interest.” DNR lists the purposes of the Municipal Entitlement Act as threefold:

- Create or expand a tax base
- Generate revenue through land sales and leases
- Provide a land base that could be reserved for public areas or facilities as well as provide a land base for community expansion

These purposes will likely lead to fragmentation of the conveyed lands and their conversion to private ownership through sale or lease. Generation of revenue through land sales and leases may be useful if done as part of community expansion and careful resource development, but is more problematic when done in areas that have statewide public values. We do not oppose those selections that may provide for development of town centers, residential communities and other private holdings that promote community development. Acquisition of lands solely for the purpose of revenue generation through fragmentation and development must be examined much more critically and carefully to determine if it is truly in the public interest.

c. TBAP Amendment is not trivial - Requirements under AS 38.04.065(b)

The development of the Tanana Basin Area Plan was a multi-year public process and its revision is a serious matter. Even though the expressed purpose of this amendment is to establish classifications that are conveyable, the amendment process should give careful consideration to the most reasonable use of these lands. In the Draft Amendment (p. 8), DNR lists **eight factors** that must be considered as part of a plan revision under *Evaluation of AS 38.04.065(b) Requirements* (statute is attached). Most pertinent to this discussion are examination of multiple use values, alternative present and future uses, evaluation of physical, economic and social values, and areas of critical environmental concern.

DCC argues that the removal of the “wildlife habitat” classification simply to expedite land conveyance does not reflect a detailed examination under *34.04.065(b)*. In addition, maintaining a classification of “public recreation” on selected lands argues mainly for **retention** by the state. The TBAP, on page 1-9, states “Recreation values are protected mainly by retention and multiple use management.”

d. Scope of Decision on Conveyance of land should be broad

DNR, in the Preliminary Decision, on page 2, asserts that the scope of administrative review under *AS 38.05.035(e) (1-2)* “is limited to the decision to transfer title from the state to the DB towards satisfaction of their land entitlement. The scope of this review does not take into account any future development, or the effects of such, that may occur after transfer of title.”

However, DCC argues that the scope of this decision must include reasonable projections on possible future development. In fact, such projections are part and parcel of TBAP revision

requirements under *AS 38.04.065(b)* as discussed above. Furthermore, DNR has already made such judgments in its Preliminary Decision when rejecting some areas on the advice of other government agencies, for example when there were important habitat or viewshed issues. It is only through such analysis that the state can determine whether an overriding state interest requires retention of lands in state ownership. The state must know that fragmentation of lands and their sale or lease is probable on many of these selections. There are cases where it is simply in the state's interest to ensure that selections remain un-fragmented. We will offer such considerations in comments on individual ADLs.

DCC appreciates the changes that DNR has already made in the selection numbers to protect habitat and scenic resources. We have a few more acres to suggest for retention by the state to protect their public value.

2. Important existing management guidelines argue for retention of additional lands

If prior state planning documents have stressed the statewide significance of certain lands, be it for scenic beauty, recreation or habitat, this ought to provide a strong incentive to retain them in public ownership. Below are some examples of existing intent for certain lands.

a. Statewide significance of Parks Highway Corridor

Several selections under this decision border upon or include the George Parks Highway. Recent visioning and planning documents have included *Parks Highway Visioning Document*, 2006, prepared for the Department of Transportation and Public Facilities by CH2MHill, and the *George Parks Highway Scenic Byway Corridor Partnership Plan*, in draft form as of this writing, prepared for DOT&PF by DNR and a large group of citizen partners.

The *Parks Highway Visioning Document* (2006) lists the important resources of the highway and makes both general and specific recommendations for safety and resource protection along the road. For example;

- “Recreation and tourism are extremely important in this corridor and the world-class scenic value is a valuable asset... The segment of the highway from the Chulitna River to Healy is designated a State Scenic Byway because of the incredible vistas of the Alaska Range and the rugged wildlands... Viewsheds need land use planning and inter-governmental coordination to provide protection... The National Parks Service is concerned about impacts of development on scenic vistas around Denali National Park. This is primarily development that is out of sync with its contextual surroundings, such as the new hotels in Nenana Canyon or possible strip development along the highway in the Trapper Creek area ancillary to potential future development discussed in the *Denali National Park and Preserve: South Side Development Concept Plan*.” Pg. 5-9 and 5-10, *Parks Highway Visioning Document*, 2006.
- “The corridor should remain a beautiful drive... Design criteria need to consider scenic value. ADOT&PF should support land management policies that protect scenic values... Retaining any public land for its scenic value is an important consideration whenever public land sale is being contemplated anywhere in the corridor.” Pg. 5-10, *Parks Highway Visioning Document*, 2006.
- “Human issues, such as safety concerns along the highway, are an important aspect for this plan. Some of the human issue comments include maintaining wide buffer strips between the highway and development to eliminate visual impact of the highway. Maintaining the scenic value of this corridor has been emphasized repeatedly, as well as the recognition that this corridor is a valuable tourism asset that is worth preservation.” Pg. 6-4, *Parks Highway Visioning Document*, 2006.

- Overall vision is for “A high degree of mobility for through trips while accommodating local access and slower travelers should be provided in a manner that is highly compatible with the communities and the environment along the corridor. The highway should be free-flowing with enough capacity and appropriate design standards to safely support travel at highway speeds.” Pg. 2-1, *Parks Highway Visioning Document*.

Needs anticipated for the northern Nenana Canyon in both planning documents include climbing and passing lanes and management of access to nearby lands. Problems with adequate right of way to achieve these needs may exist. “Generally, the existing right-of-way of the Parks Highway is 200 to 300 feet wide. Of particular concern to ADOT&PF is how to acquire or protect future needed right-of-way before development takes place on that property. The present lack of detailed long-range transportation planning, system planning, or corridor planning and the difficulty of early acquisition of right-of-way have resulted in development occurring in the path of highway projects. This has resulted in higher right-of-way acquisition costs and the resulting expenditure of funds that could be used for construction.

Additional right-of-way may be required in the future to accommodate improvements in Wasilla and Nenana Canyon, which may include interchanges, frontage roads, or bypasses. These same improvements will be needed in numerous other growth nodes and selected rural segments. Additionally, there are other areas where the existing width is not sufficient to accommodate the needed number of travel lanes. The need for additional travel lanes often is driven by population growth, which, when accompanied by roadside development, dramatically increases right-of-way costs.” Pg.7-1, *Parks Highway Visioning Document*, 2006

b. **Statewide significance of Nenana River Corridor**

The Tanana Basin Area Plan (TBAP) stressed the importance of the Nenana River Corridor, which forms a boundary of several selections in the Preliminary Decision. It should be noted that the Nenana River Corridor (subunits 4R2 and 4R3) actually overlaps a significant portion of ADL 415636.

- “Because of the river’s importance to the state’s residents and visitor industry, the Nenana River Corridor (subunits 4R1-5) will be managed to **maintain its current character** and to protect its scenic, recreational, and fish and wildlife values. . .to maintain the quality of the recreation and habitat in the corridor, subunits 4R2, 4R3, 4R4, and 4R5 are recommended for legislative designation as a State Recreation River.” Pg. 3-153
- TBAP suggests appropriate buffer widths along streams recommended as State Recreation Rivers. “...publicly owned buffers of at least one-fourth mile landward from the ordinary high water mark on each bank should be retained on streams recommended for legislative designation as State Recreation Rivers.” Pg. 2-25
- For Nenana River corridor subunits 4R2 – 5, TBAP states, “To provide scenic, recreational, and wildlife values...land use authorizations are allowed...only if facilities are temporary and visually screened.”
- The TBAP lists three guidelines for considering addition to the recreation river system, including, 1) planning and management to solve or avoid important management problems...2) to recognize the state-wide or regional importance of the river’s recreation resources...3) to ensure long-term retention in public ownership and management to ensure public recreation, fishing and hunting.” Pg. 4-2. The TBAP further states, “Until the legislature takes action on these proposals, these areas will be managed consistent with the guidelines stated above...and the plan for each management unit.” Pg. 4-3.

3. Comments on proposed conveyances

a. General comments, common to several or all ADLs

- **Stream buffers:**

DCC supports maintaining 200 foot buffers along streams within any of the selections. These buffers would **remain in state ownership**, not be available for non water-dependent development, and would function to maintain public access and wildlife corridors. TBAP recommends “a standard buffer width of 200 feet (including a 50 ft. public access easement) should generally be established landward from the ordinary high watermark on each bank unless the use or activity is water-dependent or water-related.” Pg. 2-15. The Northern Region Office of DNR made similar recommendations in the PD. Although TBAP supports a reduction to 100 foot buffer in individual cases, we argue that area-wide application of the smaller buffer is inappropriate at time of conveyance, especially in areas that are valuable as wildlife habitat and corridors.

These 200 foot buffers would apply, for example, along the Nenana River at Rex Bridge (ADL 417991), Panguingue Creek (possible future conveyance north of ADL 415809), Dry Creek (in ADL 417602 and 415801), the streams flowing into the river along Nenana Canyon (ADL 415636), Montana Creek (ADL 415802, 415804); Yanert (ADL 415811), and those streams that flow into the Nenana River in Nenana 2, if eventually conveyed (ADL 415813). We are especially concerned to maintain the maximum buffer along Montana Creek, considering that the area around it is classified for Settlement and that Montana Creek is an important wildlife corridor.

- **Nenana River potential as State Recreation River:**

DCC supports the ¼ mile publicly owned buffer along the Nenana River in subunits 4R2-5, which is consistent with eventual designation as a State Recreation River (see TBAP, pg. 2-25). This buffer would apply to Nenana Canyon (ADL 415636), those portions of the Nenana River in Montana Creek (ADL 415802 and ADL 415804) and Nenana 2, if conveyed (ADL 415813).

Despite the fact that the Preliminary Decision stated that 200 ft. buffers would be sufficient for waters recommended for state recreation river designation, TBAP recommends ¼ mile, and DCC agrees, in areas where this is still possible.

- **Adjacency to Denali National Park**

Those ADLs in relatively undeveloped areas adjacent to Denali National Park require careful consideration, since removal from public ownership could result in their fragmentation, development, interference with wildlife movements, and damage to viewing opportunities. The Tanana Basin Area Plan and Parks Highway Visioning documents, above, have cited the statewide importance of lands adjacent to the national park.

In addition, NPS studies, through radiolocation, of caribou and wolves show a strong dependence of these two animals on areas just outside the park that are incorporated into the following ADLs:

Panguingue A (8 Mile Lake) – ADL 415809, 415810

Otto Lake – ADL 415801

Nenana Canyon – ADL 415636

Attached to this document are two maps, courtesy of NPS. The first, a color map of Denali National Park winter caribou range, indicates a winter concentration of caribou radiolocations in the eastern portion of state owned lands incorporating parts of ADLs 415809, 415810 and 415801. The second, a color map of radiolocations for wolves, shows a strong concentration of radiolocations in the above ADLs. Given the strong importance of these ADLs for wildlife habitat, we do not support amendment to remove Wildlife Habitat classification from them. The state Department of Fish and Game gave similar recommendations for ADLs 415809, 415810 and 415636 in the Preliminary Decision.

b. Comments on individual ADLs

ADL 415809, ADL 415810

Panguingue A – 8 Mile Lake & upper Stampede

1. TBAP amendment - Do not amend TBAP to remove Wildlife Habitat (WHB) classification. The current classification accurately reflects its statewide importance.

Evaluation of this selection under AS 38.04.065(b)

- (1) Multiple use – The 8 Mile Lake area is accessible by road and currently experiences multiple uses through permit, including research (UAF LAS 24220), recreation, berry picking, bird watching, and access to lands west. Diverse public use of the area would be disrupted if the area itself were fragmented and subjected to sale or lease, a likely outcome of amendment.
 - (2) Physical factors – The area is underlain by permafrost currently being studied by UAF students for effects of global climate change as ice melts. This makes impacts from human uses more likely and less subject to remediation. It argues against amendments that could lead to sale or fragmentation of the area.
 - (3) Critical environmental concern; habitat – The use of this area as staging for migratory birds and as habitat for a diverse group of species argues against removal of WHB classification. TBAP classified this area, the eastern portion of subunit 4E1, as B-1, high value habitat. TBAP states that B-1 areas should be conservatively managed for their values. The Alaska Department of Fish and Game argued against conveyance of these ADLs on the basis of habitat (caribou, moose, grizzly, furbearers) and recreation. See also the maps referred to in **3a.** above (*Adjacency to Denali National Park*) that depict the importance of this area to the wider Denali ecosystem for caribou and wolves.
 - (5) Consideration of present and potential uses – Potential for inclusion of 8 Mile Lake in a state recreation area or other protected zone exists if and only if it remains in state hands. The advisability of such designation has been considered and advocated by members of this community. Such a potential use would ensure continuation of existing uses while avoiding some of the pitfalls of fragmentation and lease or sale, more likely outcomes of conveyance to the borough. The local borough does not have the expertise or motivation to manage large tracts of recreation land. The borough's interest would instead be community expansion (more logical in other offerings such as Panguingue B and Healy) or revenue generation. In the 8 Mile Lake area, revenue generation could lead to fragmentation through sale and lease and potential for closure of this area to its current diverse multiple use by members of the public.
- 2. Preliminary Decision to convey – Do not convey these ADLs to the Denali Borough.** Although, on advice from ADF&G in consideration of recreation and habitat concerns, DNR reduced the size of the proposed conveyance, the only way to address these concerns fully is to retain the entire parcel in state ownership. See also our recommendation on stream buffers under **3a.** above.

ADL 415801

Otto Lake

1. **TBAP amendment – Do not amend TBAP for portions of this ADL in section 35, from Wildlife Habitat (WHB)/ Public Recreation (PUR) to Settlement (STL).**

Do not remove Wildlife Habitat classification from Section 35 so that it may be conveyed to the borough.

Evaluation of this selection under AS 38.04.065(b)

- (1) Multiple use –Diverse public use of the area would be disrupted if the area itself were fragmented and subjected to sale or lease, a likely outcome of amendment.
 - (2) Physical factors – The bluffs north of Dry Creek in sections 26 and 27 are already conveyable, so no amendment is needed. However although classified for settlement, they are steep and not amenable to settlement. The part of section 27 that is down by the creek and amenable to settlement has already been settled and there are private holdings there. Half of section 35 is steep hillside, not amenable to settlement.
 - (3) Critical environmental concern – Section 35; use of this area as a travel corridor for wolves, many of whom spend significant time here in the winter and travel from distant sites in Denali argues against amending WHB/PUR. In addition, wolves use the ridge in Section 27, as evidenced in the attached map “Locations of Radio-collared wolves, 1986-2008.” Sections 26 and 27 north of Dry Creek are already in a conveyable classification, however their best use in the future would be to remain in public ownership and provide habitat and public recreation.
 - (5) Consideration of present and potential uses – this area provides public recreation to adjacent residences in winter. Views of Mount Healy, the foothills to the south and the ridge above Dry Creek are compelling and natural. Reclassification of WHB/PUR lands in section 35 could negatively impact the opportunities of nearby folks to utilize open areas near their homes, and for guests at nearby lodges to enjoy general use state lands.
2. **Preliminary Decision to convey – do not convey lands in section 35 or in those areas of sections 26 and 27 that are north of Dry Creek. Maintain 200 foot buffer on each side of Dry Creek (this leaves approx. 400 acres that are appropriate for conveyance).** Although some of this area is already in a conveyable classification, the lands we recommend eliminating are more important retained in state ownership for multiple use and recreation. In addition, the above retention will reduce the likelihood of fragmentation, lease or sale of lands that have value as wildlife corridors and for scenic views. See also our recommendation on stream buffers above in **3a.** above.

ADL 415636

Nenana Canyon

1. **TBAP amendment – Do not amend TBAP for this ADL by removing WHB classification.**

This ADL includes two somewhat different areas. North of Moody Bridge, the topography is flatter and views of the Nenana River become more limited as one travels north. South of the Moody Bridge, the topography is much steeper, the area of the selection quite narrow and the views of the river are dramatic. Evaluations below will consider the somewhat unique considerations that pertain to each area.

Evaluation of the selection under AS 38.04.065(b) – Lands north of Moody Bridge

- (1) Multiple use – This selection was identified as part of the Nenana River Corridor in the TBAP and was recommended for designation as a state recreation river. Much of this selection is in the ¼ mile setback recommended on either side of a state recreation river. As such its scenic resources are primary and promote retention in state ownership. The potential for a state scenic pullout already exists at Bison Gulch (See also **2b.** above, *Statewide significance of Nenana River Corridor*).
- (2) Physical, economic and social factors – Visual resources abound in this section, although the scenery is not as precipitous as the scenery in land south of Moody Bridge. This section of the Parks Highway contains the designated State Scenic Byway (which ends at Healy). As such public values are primary (see also **2a.** above, *Statewide significance of Parks Highway*). There are few trees close to the highway here, leading to inevitable visual impact from development.
- (3) Critical environmental concern –Use of this area as a travel corridor for wolves, many of whom spend significant time here in the winter and travel from distant sites in Denali argues against amending WHB/PUR. (See **2c.** above *Adjacency to Denali National Park*).
- (5) Consideration of present and potential uses – Recommendations from TBAP, the Parks Highway Visioning Document (2006), and the presence of a Scenic Byway through the very middle of this section, all these existing plans argue against amending TBAP so that these lands can be conveyed to the borough.

Evaluation of the selection under AS 38.04.065(b) – Lands south of Moody Bridge

- (1) Multiple use – There is a great diversity of users here, including drivers, park visitors using either bus transport or the Alaska Railroad, boaters, either individual citizens or tourists moving down the Nenana River on large rafts, and hikers in adjacent units of the National Park or state lands. The visual resources of this canyon are pre-eminent in this section and very important to these diverse users (See also **2b.** above, *Statewide significance of Nenana River Corridor*).
- (2) Physical, economic and social factors – the precipitous sides of the Nenana Canyon make for dramatic visual resources, but also make it much easier for small developments to be seen. Public values are primary (see also **2a.** above, *Statewide significance of Parks Highway*). Looking at this selection, it hardly seems possible that one could build on such steep ground, but experiences further south in the Nenana Canyon show that this type of development has happened, with severe impacts to viewshed.
- (3) Critical environmental concern –use of this area as a travel corridor for mammals traveling from Denali park and other locations (including Dall Sheep, wolves and caribou) argues for retention of WHB/PUR (See **2c.** above *Adjacency to Denali National Park*).
- (5) Consideration of present and potential uses – Recommendations from TBAP, the *Parks Highway Visioning Document* (2006), and the *Draft Scenic Byway Corridor Partnership Plan* (2008) argue against amending TBAP and for retaining these lands in state ownership. Conveyance could lead to fragmentation and sale or lease by the Denali Borough. The same problems encountered in the existing node of development at the southern end of the Canyon could be encountered if development proceeds at the northern end. Already the Department of Transportation and Public Facilities has indicated how private developments could interfere with needed highway improvements in the future (see *Parks Highway Visioning Document*, pg. 7-1, above). Safety problems are inevitable when development occurs in a precipitous area with numerous turns, but their solution will be difficult in such a confined area.

2. Preliminary Decision to convey – do not convey lands in ADL 415636.

Although, on the advice of the Northern Region Office of DNR, lands between the highway and the Nenana River were removed from this offering, the only way to protect the important statewide values in this area is to retain the entire ADL in state ownership. The importance of these lands as habitat and wildlife corridor, their statewide recreational importance, their incredible viewshed values, all of these factors argue for retention in state ownership. It is not logical to omit a portion of the selection for the sake of viewshed, as you did on the advice of your own Northern Region Office, and leave in another portion that is just as highly viewable from locations throughout the canyon. The state should continue its efforts to designate the Nenana as a State Recreation River, and to develop the Parks Highway Corridor in line with prior statewide visioning.

ADL 415802, ADL 415804

Montana Creek

1. TBAP amendment – Do not amend TBAP for this ADL by removing WHB status.

Do not remove Wildlife Habitat classification from this selection so that it may be conveyed to the borough.

Evaluation of this selection under AS 38.04.065(b)

- (1) Physical factors – This selection is on the side of Sugarloaf Mountain. The ground is precipitous and development is inappropriate.
- (5) Consideration of present and potential uses – The borough may wish to build a road across this area to its holdings at Montana Creek. However, the borough would likely have to apply to the state to build a public road, something it can do even if it does not own this section. There is no other reason to own this section. The land adjacent to this corridor is more valuable as a viewshed and should not be fragmented, turned into lots, or developed.

2. Preliminary Decision to convey – do not convey this selection

This selection does not need to be owned by the Denali Borough to provide access to its holdings on Montana Creek.

4. DCC's position on Alternative Actions

a. Preliminary Decision p. 25

DCC supports a modified preferred alternative 3, with additional lands retained in state ownership, based on concerns expressed above. If we have not commented on a selection, then we support the state's action on that selection. See table below. Changes are highlighted.

b. TBAP amendment p. 7

DCC supports a modified preferred alternative B, with fewer lands removed from Wildlife Habitat classification, based on concerns expressed above. If we have not commented on a proposed amendment, then we support the state's action on that amendment. See table below.

c. Replacement of non-conveyed lands.

DCC has suggested that approximately 4,863 more acres be retained in state ownership, mostly for management of resources with statewide significance. We are aware that, even if all acreage were conveyed exactly as the Preliminary Decision lays out, there must be another round of conveyances to satisfy the entitlement of 49,789 acres. We note that there are approximately 8,000 acres not conveyed in this decision that will be available at that time. Other selections can also be made at that time. There will be ample acreage to complete the borough's entitlement even if DCC's suggested alternative is adopted.

Proposed plan revisions; DCC suggestions are in yellow

Municipal Selection Location	Current Management Subunit	Current Classification	Proposed Management Subunit	Proposed Classification Change	To be conveyed (PD) <i>(reclassified but not conveyed)</i>	To be conveyed (DCC)
Anderson ADL 415639	4F4	RMG	No change	No change	80	80
Browns Court ADL 415797	4F2 4F3	PUR, WHB, AGR, STL	4 F5	STL	521	521
Rex Bridge ADL 417991	4F2 4R1	PUR, WHB PUR, WHN	4F6, 4R6	PUR	559	559
West (ADL 417601)	4G2 4G1	WHB RMG	4G3 No change	RMG No change	5760	5760
East (ADL 415805)	4L1 4Q2 4P1	PUR, WHB WHB WHB, MIN		RMG	5760 (1920)	5760
Slate Creek (ADL 415800)	4F2 4F1b	PUR, WHB STL	4F7 No change	PUR No change	1364	1364
Panguingue A (ADL 415809)	4E1	PUR, WHB	4F7	PUR <i>DCC recommends retain WHB</i>	1565	<i>DCC recommends 0</i>
Panguingue B (ADL 415809)	4F2	PUR, WHB	4F8	PUR	2465 (2560)	2465
Healy (ADL 417601)	4F2	PUR, WHB	4F9	PUR	731	731
Otto Lake (ADL 415801)	4E1 4F1	PUR, WHB STL	4E3 No change	<i>DCC recommends retain WHB on approx 700 acres No change</i>	1501	<i>DCC recommends 400</i>
Nenana Canyon (ADL 415636)	4F2 4R3 4R2 4C2 4D1	PUR, WHB PUR, WHB PUR, WHB PUR, WHB MIN, WHB	4F10 4R7 4R7 4C3 4D4	PUR <i>DCC recommends no change</i>	1737	<i>DCC recommends 0</i>
Montana Creek (ADL 415802)	4C2	PUR, WHB	4C4	PUR <i>DCC recommends no change</i>	460	<i>DCC recommends 0</i>
Yanert (ADL 415803, ADL 415811)	4C2 4C1	PUR, WHB STL	4C5 No change	PUR No change	2,240	2,240
Yanert B (ADL 415803)	4R4 4C1	PUR, WHB STL	4R8 No change	PUR No change	38	38
Nenana River 1 (ADL 415612)	4B1	PUR, WHB	4B2	PUR	80	80
Nenana River 2	4B1	PUR, WHB	4B3	PUR	(3750)	0
TOTAL					24,861	19,998 <i>(4,863 acres retained by state)</i>

Thank you for the opportunity to comment on this very important land conveyance. If you have any questions, please feel free to contact me.

Sincerely,

/s/Nancy Bale
President, Denali Citizens Council
907-277-3825

Attached:

Pertinent statutes
Caribou wintering map
Wolf radio-locations