

December 31, 2008

To: Monica Alvarez

Re: Intent to Adopt Tanana Basin Area Plan Amendment, Order NC-90-002A50

Dear Ms. Alvarez,

On behalf of the board of directors and members of the Denali Citizens Council (DCC), thank you for the opportunity to review the Revised TBAP Amendment.

We note that the State of Alaska considered suggestions made by DCC to drop all or portions of the selections entitled Panguingue A, Otto Lake and Nenana Canyon. We made these suggestions because;

1. The primary values of these lands depended on their being left intact as healthy wildlife habitat and for public recreation.
2. State, rather than Borough, ownership would best protect wildlife and habitat values in those selections because of the state's managerial expertise. In addition, the state has an expressed special interest in maintaining the Nenana River Corridor in public ownership.
3. The Denali Borough, though it may express the desire to manage land for habitat and recreation, does not have expertise in this area.
4. Conveyed entitlement lands, because of their importance not only for community development and as a land base, but for economic gain, are likely to be divided and sold, and these lands should be kept whole.

The state, in its analysis of comments, recognized and agreed with the principle that it has special interest in maintaining certain lands in public ownership for wildlife habitat and public recreation. We appreciate and support the following revisions:

1. Removal of Panguingue A (Unit 4E2) from the Amendment.
2. Removal of a wildlife corridor on Dry Creek and a Portion of Section 35 in the Otto Lake conveyance from the Amendment to allow for wildlife corridors.
3. Removal of portions of the Nenana Canyon conveyance south of Bison Gulch from the Amendment.

However, we have two concerns to express in this letter, first with respect to the Nenana Canyon conveyance, and second regarding stream buffers. See next page for details.

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DCC Board

Nancy Bale  
Anne Beaulaurier  
Jean Balay  
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Julia Potter, Community Organizer

**Nenana Canyon conveyance:** With respect to the Nenana Canyon conveyance, we ask that the state reconsider and exclude the entire unit, including areas north of Bison Gulch, from the Amendment.

Here are our reasons:

1. This windswept area is valuable for recreation and as a wildlife corridor, as we presented in our original comments.
2. Conveyance to the borough will increase the probability of strip development in this area. Such development could affect its value for public recreation and as habitat.
3. There are few trees adjacent to the highway and little chance for any type of buffering to protect the viewshed if development occurs. Designation as a Scenic Byway Corridor continues through this section, arguing for strict protection of views. As noted before, conveyance is likely to lead to partition and sale of lands along the highway.
4. The area east of the highway in the vicinity of Bison Gulch should be developed by the state as a wayside. It is informally used for parking and scenic hiking already. The borough has no expertise in this area, or access to funds for this purpose.

We ask that you reconsider the Nenana Canyon to exclude the entire selection from the Amendment.

**Stream buffers:** We ask that the state retain the 200 ft. buffers on waterways within conveyed lands, especially along Montana Creek, for instance. The Revision contained no language indicating whether this change had been made.

Again, thank you for the opportunity of being involved with this public process.

Sincerely,



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