

Susitna Basin Recreation Rivers Advisory Board

February & March 2023 Work Session Notes



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RELEVANT PLAN-WIDE

- A mechanism should be developed for ongoing public feedback (after the plan is done) on changes to rivers, etc.

POTENTIAL STATUTORY CHANGE SUGGESTIONS

- Board members would like to see the Chickaloon and Knik tribes represented on the board. Monica mentioned a potential statutory change to not limit each board member to a specific category of representation but rather to a grouping of interests.
- We should add the Upper Susitna from Talkeetna to Devil's Canyon to the Recreation Rivers.
 - Note: A portion of this from Lane to Gold Creek is within Denali State Park.
- Part of the Upper Talkeetna River was recommended for Recreation Rivers before.
 - Note: Adjacent to but not part of the Nelchina Public Use Area. Surrounding surface estate ownership villages of Tyonek, Knik & Seldovia. Subsurface estate owned by CIRI. Small 1 acre easement held by DNR.
- P. 3-77. The Recreation Rivers corridor should extend from Judd Lake to Talachulitna Lake. Add this parcel to the Legislatively Designated Area (LDA).
 - Note Talachulitna Lake is already within the Recreation Rivers corridors.



CHAPTER 2: AREAWIDE LAND & WATER MANAGEMENT POLICIES

- Update the Wildlife and Fisheries sections for many subunits.
- Reference RS-2477 trails throughout the subunits.

❖ Goals -- Page 2-1

- P. 2-1. Under goals opening paragraph add “...accommodation of access for the public and private landowners.

❖ Management Intent -- Page 2-2

- P. 2-2. Access—Add and private property.
- P. 2-2. Management Intent - Management decisions on whether proposed land uses are compatible and which guidelines apply will be based on these general management intent statements, guidelines, public/agency comments and specific management intent for the subunit.
- P. 2-2. Proposed Regulations - New regulations as proposed by the 1991 plan have never been enacted or even drafted. This section needs updated as there are multiple references in this chapter to new regulations. Each mention of new regulations should be evaluated as whether the language should be kept or altered to reflect reality.

General Notes:

Work Session Feedback/Notes:

- Public visitors: Eric Booton, Trout Unlimited; Ted Eischeid, MSB Planner. Greg Pralle, MSB; One additional member of the public.
- Recommend that DNR comes up with measures on how we are doing on the intent of the Recreation Rivers plan – what measurements for use do we have?

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Public Use Sites -- Page 2-5

Scoping Feedback:

- One commentor requested that the corridor boundary of the Little Susitna be extended to include a Public Use Site on Ayrshire Avenue. This area is part of the Susitna Flats State Game Refuge.
- One commentor is concerned about the management of the Public Use Sites at the mouths of Larson and Clear Creeks and how bank erosion has impacted these sites.

Board Member Feedback:

- Management guidelines state that there are 73 Public Use Sites identified. Is this still the case? None exist on the Talachulitna. Perhaps these should be eliminated if they do not exist. (2-5)

Work Session Feedback/Notes:

- Larson Creek was quiet in the 90's – now it's crowded. Larson Creek attracts large camps that stay for a week or longer. The Talkeetna River Trail provides easy access for ATV's as well as boat access. People do self-police well. According to Sam Ivey (ADFG), this is the hottest fishing location on the Talkeetna.
- Clear Creek – maybe two guide boats and 12 people fishing – used to be 100. Less pressure than in the past due to a much-diminished king salmon run.
- We have had three “100-year” floods in last 40 years – these change public use sites dramatically. Sites should move as the river moves.
- P. 3-44. PU 3b.1. Jet boat technology has improved and these days the mouth of Disappointment Creek on the Talkeetna is busy. It is beautiful and a bit remote. Already a Public Use Site.
- There is less traffic now than before on the Talkeetna River.
- During the 1991 plan process, there were 10 lodges on Alexander Creek and 40-50 people living in the area year-round. Now there are no lodges and only about 10 people living there year-round or mostly year-round. Fishing is very limited and there are no businesses.
- People fish pike in Alexander Lake but don't pay to fly in to do it in lower Alexander Creek.
- A better way for people to identify the Public Use Sites should be developed.
- The 1991 plan says that only commercial camps are allowed for 4 days.

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- Note: Public Use Sites: "Commercial camps that remain for more than four days are not allowed in public use sites (p 2-5)"
- If it's not busy, maybe there could be flexibility on how long people camp. The regulations should be changed to be more liberal since it's not as crowded most places.
- A jet boat can operate in 3 inches of water. When we have low water at Clear Creek (prime King salmon habitat) can we limit jet boats at places where the creek is just a trickle, esp. during July when spawning is happening? Some spawning creeks like Fourth of July Creek have gone totally dry for a whole year.
 - Note: Fourth of July Creek is a tributary of the Susitna and outside of the Recreation River corridors.

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Special Management Areas -- Page 2-5 to 2-6

Scoping Feedback:

- No specific comments related to Special Management Areas.

Board Member Feedback:

- No specific feedback related to Special Management Areas.

Work Session Feedback/Notes:

- Coast Guard deems the Talkeetna a navigable river, like a highway, so the state can't charge fees.
- Recommend that DNR comes up with measures on how we are doing on the intent of the 1991 Recreation Rivers plan – what measurements for use do we have?
- Commercial permits offer the only measurement of use for DNR.
- DFG has statewide harvest totals – DFG can get a measure of fishing effort. Include a Recommendation that there be better measurement tools for habitat/wildlife such as weirs.
- Adjust allowed uses to be flexible based on flow rates and on the volume of use.
- Does DEC measure water flow?
- There are gaging stations on the Talkeetna and the Talachulitna. There should be one on the Chulitna.
- There is no weir on the Talkeetna.
- Sam Ivey said that weirs are the best measurement tool they have but are not appropriate everywhere. On some streams, the flow is too high, and a weir would be washed out. There is also a financial limitation to the number of weirs that ADFG can have. Weirs are manually staffed. ADFG has other tools to assess fish counts that work well. Fly overs are used when turbidity is low (example Clear Creek). They might also utilize sonar or a counting tower when possible.
- P. 2-21. *Closures and Use Management*. Does this section allow the Director to mandate closures at any time? Did we develop regulations to allow such closures?
 - Note DNR is researching this issue.
- Q. Should we look into getting volunteers for enforcement on the Recreation Rivers?
A. Volunteers could conduct use counts and help with clean ups. They can also serve as Camp Hosts. Volunteers cannot do enforcement.

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- MSB has a “problem reporter” mechanism. Could we do that for Rivers? Why can’t DNR have one for state-wide use? Candice: We do not have money allocated for dealing with trespass which is what these types of things would usually be.
- Do any Special Management Areas overlap the route of the proposed West Susitna Access Road? Are there SMAs or Public Use Sites (6d.1 & 5a.1) where the proposed route crosses the Talachulitna or Alexander Rivers?

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Riparian Management Areas -- Page 2-6 to 2-10

Scoping Feedback:

- Several commentors expressed concerns over increased rates of bank erosion, degraded water quality, and the degradation of riparian areas within the corridors. The Little Susitna was specifically mentioned several times.
- Several commentors expressed concern over damage to riparian areas from motorized use including ATV and truck traffic within riparian areas.
- Remnants of burn piles next to rivers may degrade water quality when water levels rise or from runoff into streams.

Board Member Feedback:

- P. 2-6. Goals - Add under Access - Provide reasonable access to private lands adjacent to riparian areas.

Work Session Feedback/Notes:

- The Goals for this section still seem relevant and good and perhaps do not warrant any changes.
- P. 2-6. references the US Army Corp 404 process – that should be changed to Clean Water Act process. This should be updated throughout the plan.
- Q: Have floodplain and wetlands maps been updated since 1990? Can we plug those in? A: Yes, we can use the National Wetlands Inventory.
- How does this plan overlap with MSB efforts on flood control for the Talkeetna River? Riprap is probably all on private or AKRR land or on the Susitna River which isn't one of the Recreation Rivers. Erosion is always a factor in riparian areas. Maybe there should be more recommendations associated with bank stabilization.
- We should add the Upper Susitna from Talkeetna to Devil's Canyon to the Recreation Rivers.
 - Note: A portion of this from Lane to Gold Creek is within Denali State Park.
- Part of the Upper Talkeetna River was recommended for Recreation Rivers before.
 - Note: Adjacent to but not part of the Nelchina Public Use Area. Surrounding surface estate ownership villages of Tyonek, Knik & Seldovia. Subsurface estate owned by CIRI. Small 1 acre easement held by DNR.

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Upland Development -- Page 2-10 to 2-12

Scoping Feedback:

- Commentors would like to see thoughtful/intelligent development that follows strict guidelines to limit environmental damage.
- Commentors would like to see guidelines for upland development for powerlines, pipelines, and airstrips to reduce potential safety hazards and impacts on fish and wildlife habitat, recreation, water quality and navigation.
- Several commentors expressed that they would like the levels of development to remain as they are. One commentor specifically mentioned Lake Creek as being “busy”.
- Many commented on the West Susitna Access Road and the increase in commercial development that it would bring to the area. Most that commented on this issue were against this development.
- Concerns over habitat degradation and impacts to water quality from the proposed Matanuska Electric Association’s Fishhook to Pittman Transmission line were also brought forth.
- Several commentors expressed that they would like to see development that improves public access and resources for public use.

Board Member Feedback:

- Removal of unauthorized cabins? Did this ever occur? Can it be eliminated? (Page 2-11)

Work Session Feedback/Notes:

- Are there any research cabins for scientific study in the corridors?
- Nancy doesn’t know of any trapping in the Alexander Creek area. There were some former trappers but they didn’t have cabins.
- Q: Why was there emphasis on not adding new cabins? A: The plan intended to balance use.
- The three cabins named on P. 2-11 were not converted to Public Use Cabins (PUCs) because DMLW doesn’t have PUCs; however, staff should look into whether these cabins were removed. Shovel Lake Cabin was in trespass.
- If MEA needs an easement, they would have to apply to DNR. MEA is in the process of getting DFG permits that follow guidelines in the Recreation Rivers plan. Colton

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said that DFG recently had a discussion with MEA about following ADFG requirements and what is in the management plan.

- Add a Recommendation that Utilities must only encourage use where it is appropriate along easements – if the public is using these easements in a damaging way, then more appropriate access should be encouraged nearby.
- Utilities should be designed to require as little maintenance as possible – but is this realistic? Does this mean just use best management practices? Consider rewriting or removing this bullet. Add something about reducing the size of clearing corridors for Utility companies. Keep 90 degree crossing requirement.
- Construction can occur only between May 15-July 15 – this is a DFG restriction. Drop the dates and attach to ADFG Title 16 permit instead. Add language on timing construction to avoid impacting fish. Fish counts on the Talachulitna don't start until July 20.

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Shoreline Development -- Page 2-12 to 2-18

Scoping Feedback:

- Commentors would like to see that shoreline development ensures that the projects are sited, designed, and constructed to minimize degradation of water quality and impacts on recreation, navigation, and fish & wildlife habitats.
- One commentor would like to see an emergency egress off Champion Road on the Little Susitna. [in 1C subunit]
- A few commentors mentioned that they would like to see a new public put-in on the Talkeetna River.

Board Member Feedback:

- Add something about preserving trees and shrubs for bank stabilization.
- Dock size is way too small – we mirror ADFG dock sizes. At this time, you have to get a permit from ADFG to have a dock and I think they do a good job.
- P. 2-13. Reclamation (2) Delete last sentence or change so landowners have the ability to stabilize a bank and maintain or reestablish private land lost to erosion.
- Anchor Buoys: Are they still necessary? (2-14)
- Floating and stationary docks: These are very restrictive in size and do not comply with ADA guidelines of a minimum of 30ft in length and 60” wide. ADA sizes should be allowed where desired. Materials required are covered in the ADFG Title 16 permit. ADFG protocol should be followed. (2-16)
- P. 2-16. Marinas and Community Docks—I’d suggest separating these two, eliminating arbitrary sizes or distances and allowing for docks at lodges or private property where necessary for access. Management decisions on whether proposed land uses are compatible and which guidelines apply will be based on these general management intent statements, guidelines, and specific management intent for the subunit. Docks for lodges should be held to same standard as any lodge outside of the Rec Rivers.
- Ladders, ramps and walkways should be able to exceed 4 feet to meet ADA compliance if desired. This is an arbitrary number not supported or documented as to why this number is inflexible. The 4’ requirement should be eliminated and land managers allowed to work with the applicant on each specific application. (2-17)
- Stream crossings. Is the culvert described in the plan still state of the art for fish passage? (2-17)

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Work Session Feedback/Notes:

- P. 2-12. *Storage of Petroleum Products*. Recommendation says store no more than 55 gallons within 100 feet of river. Maybe add language on type of storage? Metal containers and over pack drums – require secondary containment. Update to reflect modern practices. DNR already has this written in the permit process.
- Regarding the put in at Talkeetna: it needs to be dredged about 300 yards. Boaters get stranded here often. There is not much safe public access to the Talkeetna River.
- Just below the Railroad bridge in Talkeetna there is a dike on the left. One could install a harbor with a public boat launch there. The land is owned by the Alaska Railroad (AKRR) but MSB could lease it.
- The term *water dependent* is ambiguous – maybe add some examples.
- Keep set-backs at 100 feet even though MSB’s set-back is 75 feet.
- P. 2-13. Update #1 to include root-wad revetments. Change to allow natural structures? Use ADFG guidelines on stream bank restoration.
- P. 2-13. Update #3 on maintenance with the best management practices for streambank protection.
- P. 2-13, #6. Generalize to Title 16 permit and don’t include a specific date.
- P. 2-13. Update Cabled Trees with new shoreline restoration concepts.
- P. 2-13. Update drop structure terminology.
- P. 2-15. Floating Docks: add a provision requiring commercially encapsulated foam. Update to reflect Title 16 requirements. The current 100 sq. ft. size limit should be increased and the 15 feet from shore limit increased to 40 or 50 feet (depending on water depth). Increase the permit fees for the larger size for private users. Wording could start something like: “Generally, should not exceed 100 sq. ft. but if a need is demonstrated then...”
- P. 2-16. Delete language about barrels (etc.) being used in construction of docks and add something about best management practices.
- P. 2-17. Ladders, Ramps, Walkways, and Steps: Change to: Generally, do not exceed 4 feet, unless a wider need is demonstrated.
- P. 2-17. Remove entire “existing Erosion Control Projects...” section.
- P. 2-17. Stream Crossings – change to mirror ADFG regulations. Update culvert language. Bridges should be used whenever possible. Culverts can be an issue if not installed properly and bridges require less maintenance. However, if a culvert needs to be used, the types listed in this section are still preferred.
- P. 2-17. Hydrology – change 50-year flood, etc. to match what DOT requires.

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Recreation -- Page 2-19 to 2-23

Scoping Feedback:

- The recreational opportunities that this area provides are appreciated by many.
- Commentors mentioned recreating in the corridors in a variety of ways including but not limited to: fishing, hunting, snow machining, motorized boating, non-motorized boating, camping, hiking, etc.
- Many of the commentors expressed a desire for the recreational opportunities in the rivers to remain remote.
- Several commentors expressed that they would like to see more facilities thoughtfully developed for public use such as new trails and trailheads, parking areas, restroom facilities etc. One comment specifically mentioned the need for a larger parking area along Petersville Road due to congestion for winter use.
- A few commentors mentioned that if additional facilities are going to be developed, they need to be managed properly to prevent them from becoming an attractant for bears.
- Several commentors expressed that they would support new Public Use Cabins in the corridors if they are properly managed by the state.
- One commentor is concerned that new Public Use Cabins, if not managed properly, could become hideouts for criminals.

Board Member Feedback:

- Monitoring of whitewater stretches - Never implemented. (2-22)

Work Session Feedback/Notes:

- P. 2-19. Goals: Change “signs of use” to prevent (or minimize) instead of improve overcrowding.
- Mark Miller’s Talaheim Lodge on the Talachulitna is on 50-year lease with the state. ADL 220393. Airstrip easement is ADL 223605.
- Update the entire plan to say to say that regulations have been promulgated instead of “should” be promulgated.
- There is great need for human waste facilities at Larson Creek.
- P. 2-19. Allowing more than 4 days camping with a permit was suggested. Monica: Clarify the language: one needs a permit for longer than 4 days – it’s not a total prohibition on longer than 4 days.

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- Add language to many of the sections under recreation to state that a person may apply for a permit for uses outside of Generally Allowed Uses (GAUs). This does not imply permit will be approved necessarily.
- P. 2-20. Update *Developed Public Facilities*: Did MSB build campsites at the mouth of the Deshka? What about South Big Lake Road?
- P. 2-19. and elsewhere: Change “should promulgate regulations” and “proposed regulations” to appropriate wording if the regulations were actually promulgated.
- In regulations: within 11 AAC 09.200 -- 11 AAC 05.010 is referenced (fee regulation) has been repealed.
- P. 2-21. 2nd paragraph. Confirm that the suggested regulation to empower DNR to restrict weapon discharge was never implemented and maybe keep suggestion if so. Also check if MSB implemented ordinance for similar restrictive power at the Deshka’s mouth.
- P. 2-21. In the section on *Closures*, maintain a high bar for a determination that a closure is necessary.
- P. 2-22. *Monitoring of Whitewater Stretches and Other River Segments*. Instead of “a monitoring program will be developed” change to something like “could be proposed if a need develops” for both sections. Ensure it’s discretionary.

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Fish & Wildlife Habitat -- Page 2-23 to 2-26

Scoping Feedback:

- Commentors are concerned about diminishing fish runs. Specific locations mentioned include: Alexander Creek, the Little Susitna River, the upper Little Susitna River, Swiftwater Creek, Talachulitna River, Talkeetna River, and the Deshka River.
- A commentor stressed the importance of maintaining mostly undeveloped, undammed, and intact habitat to sustain salmon populations.
- Commentors were concerned about pike reducing salmon populations and increases in the range of pike due to climate change.
- Several commentors expressed concern over damage to spawning areas from motorized use. These concerns included motorized boats (jetboats and airboats mentioned) disrupting spawning beds and ATVs crossing streams and damaging stream corridors. The Little Susitna was mentioned several times. One commentor specifically mentioned increased usage on Bald Mountain Trail along the Little Susitna that has led to rutting and litter.
- Commentors were concerned about climate change. Participants would like to see the effects on fish & wildlife species (especially Chinook and sockeye) due to warming waterbodies and decreasing stream flows considered in the plan revision process.
- One commentor noted that it is difficult to determine fish counts in the North Susitna area due to a lack of fish weirs.
- One commentor indicated that the Talachulitna River (Judd Lake), Talkeetna River, and Lake Creek (Chelatna Lake) are where ADFG measures escapement and that the Little Susitna has an important weir.
- Several commentors mentioned the economic importance of the sportfishing industry as a reason to protect habitat.
- It was suggested that the plan should not be revised until all relevant research on the area over the last 30 years is synthesized – for example, groundwater inflows of cold-water should be identified before changes to stream management occur.
- A few commentors expressed concern that additional access from the West Susitna Access Road would bring in more traffic and be harmful to fish and wildlife populations. Additional snow machine traffic on the Talachulitna was specifically mentioned as a potential nuisance to moose populations. A crossing in the Sucker Creek confluence with Alexander Creek would be harmful to the spawning of chinook salmon.

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- The plan should identify fragile regions that deserve maximum environmental protection, such as migratory and rare bird species' nesting areas.
- At least one commentor would like to see subsistence closely considered in the plan revision process.

Board Member Feedback:

- # 5 - Food cache barrels not provided by DNR. (2-24)

Work Session Feedback/Notes:

- People fish pike in Alexander Lake but don't pay to fly in to fish lower Alexander Creek.
- DFG has statewide harvest totals and can measure fishing effort. Survey results are a year out.
- Include a Recommendation that there be better measurement tools for habitat and wildlife, such as weirs.
- There is no weir on the Talkeetna.
- Sam Ivey said that weirs are the best measurement tool they have but are not appropriate everywhere. On some streams the flow is too high and a weir would be washed out. There is also a financial limitation to the number of weirs that ADFG can have. Weirs are manually staffed. ADFG has other tools to assess fish counts that work well. Fly-overs are used when turbidity is low (example: Clear Creek). ADFG also may utilize sonar or a counting tower when possible/prudent.
- P.2-23. Update endangered species guidance on eagle nesting trees (USFWS).
- P.2-24. In Bears and Garbage section, check regulations at bottom of page and throughout. Look into whether bear baiting changes this paragraph at all.
- P. 2-24. *Bears and Garbage*. Update #3 regarding open pit waste.
- P. 2-25. Harvest Regulations on Moose Creek.
 - Note: Per plan "See Chapter 4, Other Recommendations, Fishing Regulations" page 4-8. Recommendation for the Board of Fisheries to open lower Moose Creek above the Kroto confluence to Kings. DFG checking to see if this ever happened and if not, should we remove this recommendation.
- Get more information on bear baiting in the corridors. Bell Island and the Chulitna were discussed but are not in the corridors.
- Check to see if animals are still being grazed in subunit 1c of the Little Su. (See pages 2-26 and 3-18)

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Commercial -- Page 2-26 to 2-31

Scoping Feedback:

- Many commented on the West Susitna Access Road and the increase in commercial development that it would bring to the area. Most that commented on this issue were against this development.
- Several commentors stressed the importance of commercial guiding and tourism in the Susitna Basin to the local economies.
- Several commentors expressed concern that an increase in commercial mining in the area could harm local commercial guiding and tourism businesses.
- One commentor would like to recognize the economic importance of bird-watching ecotourism.

Board Member Feedback:

- Commercial requirements, #2. First Aid should be replaced with WFR/OEC for commercial guides. #5: Vessels must clearly display DNR permit numbers — this was not implemented. (2-27)
- Permit fees for commercial permit program needs complete rewrite. None of it was implemented. (2-27)
- Permit fees need to stay in the resource they came from/ Not the general fund. Generate revenue for the resource.

Work Session Feedback/Notes:

- Q: Can statutorily dedicated receipts be set up for this area? A: The volume of permit fees is so low that such receipts would be insignificant. Also, they wouldn't truly be dedicated since that is unconstitutional.
- During the 1991 plan process, there were 10 lodges on Alexander Creek and 40-50 people living in the area year-round. Now there are no lodges and only about 10 people living there year-round or mostly year-round. Fishing is very limited and there are no businesses.
- P. 2-27. Update and make sure all fees make sense.
- P.2-27. *Boat Rentals*. #4. This was never implemented.
- P. 2-28. Grounds for Suspension or Revocation. Keep as is, except possibly update/change dollar amount for the fine mentioned in 3B.
- P. 2-29. *In-Kind Services*. Look at regulations to see if that is something we can do. Have there been any of these agreements on Recreation Rivers?

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- P. 2-29. *Accounting for Revenues*. Was this section implemented? Amount of money is probably too insignificant to warrant implementation.
- P. 2-29. Lodges. There are much less than 30 lodges still operating. Talaheim lodge is the only lodge remaining on state land with an active lease. Delete “Crowding is becoming a concern.” Add: “while crowding is not an issue at the time of this rewrite, there is still plenty of private land for lodges.” Add language on questionnaire results regarding not wanting more lodges?
- P. 2-30. Check to see if the number of commercial camp permits should remain the same. The current number was based on 1988 usage. The board did not seem to have an issue with the current numbers but at a minimum the language on using the 1988 survey should be removed.
- P. 2-30. #6. Update fees.
- P. 2-30. Consider adding under *Siting Criteria*: should also consider how much physical separation from other common uses such as commercial camps, trails, and private land. Fix typo under E (“human” to “human activity”).
- P. 2-30. There’s a commercial campground and boat launch on AKRR land in Talkeetna on the river. This land is leased from the AKRR by Aaron Benjamin.

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General Access -- Page 2-31

Scoping Feedback:

- The West Susitna Access Road was the focus of many comments with most participants against the development of the road.
- A few commentors were in favor of the West Susitna Access Road because it could potentially increase public access to the corridors. It was expressed that current access is often difficult for those without planes and boats.
- Several commentors mentioned that if the West Susitna Access Road is developed and funded publicly, then it should be open to the public for access.
- We heard from several commentors that would like to see greater public access to certain river corridors while many commentors would like to see access remain as it is now to limit environmental damage and to preserve a remote experience.
- A few commentors were concerned about plan revisions that might limit their access to their private property.
- A few commentors mentioned that they have issues with trespass through their properties by people trying to access the corridors. This was specifically mentioned for the Little Susitna by a few commentors.

Board Member Feedback:

- No specific feedback related to General Access.

Work Session Feedback/Notes:

- No specific changes for this section.

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Boat Access -- Page 2-32 to 2-39

Scoping Feedback:

- A few commentors expressed that they would like to see some restrictions on motorized use enforced in the corridors to limit bank erosion, damage to fish spawning areas, dangerous traffic and noise pollution. The Little Susitna was specifically mentioned by several. Jetboats, airboats, ORVs specifically mentioned.
- A few commentors stated that they are in support of continued motorized boat use in the corridors.
- One commentor would like to see an emergency egress off Champion Road on the Little Susitna.
- One commentor specifically stated that they would like to see motorized boat access in Lake Creek and Bulchitna Lake unchanged so that they can continue to access their private property.
- A few commentors mentioned that they would like to see a new public put-in on the Talkeetna River.
- A few commentors expressed that they would like to see the Talkeetna River corridor extended past Yellow Jacket Creek to protect access for floaters.

Board Member Feedback:

- #2 Minimizing restrictions needs to be evaluated. Current demand for non-motorized use has changed in many areas due to limited access. (2-33)

Work Session Feedback/Notes:

- P. 2-32. *Erosion and Other Environmental Impacts*. A jet boat can operate in 3 inches of water. When we have low water at Clear Creek (prime King salmon habitat) can we limit jet boats at places where the creek is just a trickle, esp. during July when spawning is happening? Some spawning creeks like Fourth of July Creek have gone totally dry for a whole year.
 - Note: Fourth of July Creek is a tributary of the Susitna and outside of the Recreation River corridors.
- Coast Guard deems the Talkeetna a navigable river, like a highway, so the state can't charge fees.
- P. 2-33. Clear Creek gets very low – 5 inches. At that level, jet boats would interfere with spawning salmonids and destroy redds. Probably true on many small creeks during spawning. Parts of the Little Susitna could have similar concerns. Include in plan the flexibility to respond to low water. At a certain depth, somehow restrict jet

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- boat use. Add language that allows DNR to consider future reg change? Update *Erosion and Other Environmental Impacts* to reflect the study findings. Restrictions would apply only to spawning and rearing areas of anadromous streams during certain times.
- P. 2-33. #2 Minimizing restrictions needs to be evaluated. Current demand for non-motorized has changed in many areas due to limited access.
 - On the Alexander, people have seemed to learn where it was a good idea to take a jet boat and where they would get stuck.
 - P. 2-33. 4. *Physical Characteristics of the Rivers*. Add “dependent on flow rates”. Or under 5. *Seasons* – add something about low water.
 - P. 2-37. Table 2.1. Update to reflect that the regulations have been promulgated.
 - P. 2-38. Table 2.2. Update to reflect that the regulations have been promulgated.

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Upland Access -- Page 2-39 to 2-43

Scoping Feedback:

- The West Susitna Access Road was the focus of many comments with most participants against development of the road.
- A few commentors were in favor of the West Susitna Access Road because it could potentially increase public access to the corridors. It was expressed that current access is often difficult for those without planes and boats.
- Several commentors mentioned that if the West Susitna Access Road is developed and funded publicly, then it should be open to the public for access.
- We heard from several commentors that would like to see greater public access to certain river corridors while many commentors would like to see access remain as it is now to limit environmental damage and to preserve a remote experience.
- A few commentors were concerned about plan revisions that might limit their access to their private property.
- A few commentors mentioned that they have issues with trespass through their properties by people trying to access the corridors. This was specifically mentioned for the Little Susitna by a few commentors.

Board Member Feedback:

- P. 2-41. Signs—This section should be changed or updated to reflect what's doable as signage doesn't appear likely.

Work Session Feedback/Notes:

- P. 2-42. *Section Line Easements*. DNR should consider vacating some particular section lines.
- P. 2-42. Update *Access to Private Land and Mining Locations*. All mining claims in the corridors are closed. Remove mention of statewide Coastal Management Program here and throughout the plan.

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Air Access -- Page 2-43 to 2-45

Scoping Feedback:

- Commentors stated that improved air access is needed to the Talkeetna River.
- One commentor indicated that the proposed location of the West Susitna Access Road includes construction of a bridge at the confluence of the Talachulitna and Skwentna Rivers within the corridor. The commentor states that this is a popular landing location for float planes and a bridge in this location would cause a conflict.

Board Member Feedback:

- P. 2-43. Public airstrips should include mention of the importance of water bodies in both winter and summer for public access.
- P 2-44. Floatplane Landing Areas—This should be updated. As landing areas in the referenced subunit have changed since 1991.

Work Session Feedback/Notes:

- P. 2-44. Check and update to reflect existing regulations.
- P. 2-44. Were non-motorized areas included in the Alaska Supplement? Overcast: They did not.
- Maybe remove non-motorized from the Talachulitna and the alternating weekend non-motorized designation for the Little Susitna? If not removed, how can we make this enforceable? There is no bail schedule – at most, violators would get a chastising letter.

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Water & Solid Waste -- Page 2-45 to 2-47

Scoping Feedback:

- Several commentors support maintaining instream flow reservations to preserve the quantity of water that supports fish and wildlife populations as well as recreation.
- Leave protections for the Talkeetna River in the Plan -- summer maximum flows have declined due to climate change.
- Water quality, habitat, and connectivity between riparian zones and wetlands are even more vital to maintain due to climate change warming the waters.
- Litter within the corridors is a common concern among many commentors.
- Several commentors would like to see public facilities developed to limit human waste deposition in the corridors.
- A few commentors mentioned that if additional facilities are going to be developed, they need to be managed properly to prevent them from becoming an attractant for bears.

Board Member Feedback:

- No specific feedback related to Water & Solid Waste.

Work Session Feedback/Notes:

- P. 2-45. *Litter*. Add signage for education program.
- P. 2-46. *Fuel Storage*. Check current guidelines on fuel storage with DEC – update if necessary.
- P. 2-46. *Instream Flow*. Q: Are these flow reservations in place? A: The Talachulitna and Alexander Rivers do not have reservation certificates or even applications submitted. The rest have certificates.
- P. 2-47. Check on Alaskan Pollutant Discharge Elimination System (APDES) permit for water discharge from mining operations. Can there be discharge outside of corridors in tributaries that enter in the corridors?

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Forestry -- Page 2-47 to 2-50

Scoping Feedback:

- A few commentors stated that the Spruce Bark Beetle is a concern within the corridors. The beetle-killed spruce trees are a wildfire hazard in the area.
- One commentor expressed concern that trees were being harvested in the Little Susitna corridor for bonfires.

Board Member Feedback:

- No specific feedback related to Forestry.
- P. 2-48. Commercial Use - add reduce fire hazard to this section and include provisions for small timber sales for heat and other uses at commercial lodges.
- P. 2-48. Hazard Trees - Language should be added here that includes a fire hazard from dead or dying trees located adjacent to private land.

Work Session Feedback/Notes:

- P. 2-47. *Forestry*. Add language on harvesting beetle-killed trees.

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Subsurface Resources -- Page 2-50 to 2-56

Scoping Feedback:

- Several commentors expressed that they would not like to see any new mining operations in/near the corridors and these operations could harm the local guiding/tourism economy.
- One commentor stated that they would like to see additional protections against fracking contamination from nearby projects.

Board Member Feedback:

- No specific feedback related to Subsurface Resources.

Work Session Feedback/Notes:

- There are no active mining claims in the corridors, but there is a leasehold location order (LLO 15) on a portion of the Lake Creek corridor (see map on P. 2-53).
- Remove much or all of the Reclamation information from the Plan.
- Recreational Mining is still allowed under Generally Allowed Uses (GAUs).

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Materials -- Page 2-56

Scoping Feedback:

- One commentor expressed the belief that gravel extraction should not be permitted in the corridors.

Board Member Feedback:

- No specific feedback related to Materials.

Work Session Feedback/Notes:

- P. 2-56. There are active material sites in the corridors but the material sales position in permitting has been vacant.
- P. 2-56. Update the existing pit section in the plan.
- P. 2-56. Allow material permitting for flood mitigation (e.g., Talkeetna).
- P. 2-56. Add information on flood mitigation in the Talkeetna area and around the Little Susitna (Houston).

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Land Status -- Page 2-57 to 2-58

Scoping Feedback:

- There should be no land disposals in the river corridors.
- One commentor suggested that the Susitna Flats Game Refuge should be considered for incorporation into the river corridors as was suggested in the original plan.

Board Member Feedback:

- No specific feedback related to Land Status.

Work Session Feedback/Notes:

- P. 2-58. *Acquisitions* #5 – delete mention of the mouth of Clear Creek (3c) and probably Neal Lake (2d) and Alexander Lake (6c).
- P. 2-58. Update the acreages for *University Lands* and *Mental Health Lands*.
- Acquire parcel halfway down the Little Susitna where people camp.
- Susitna Flats State Game Refuge – did management agreement ever happen? Why would we want a management agreement? Not a lot of MSB land in the area.

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Heritage Resources -- Page 2-59

Scoping Feedback:

- At a site visit along the Deshka River, plan staff learned of many different historic sites within the corridors and about the research that is being done on many of these sites. These sites should receive continued protection.

Board Member Feedback:

- No specific feedback related to Heritage Resources.

Work Session Feedback/Notes:

- P. 2-59. *National Historic Iditarod Trail*. Reference the National Historic Iditarod plan.

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Education -- Page 2-60 to 2-61

Scoping Feedback:

- One commentor expressed that he would like to see education measures implemented to help different user groups co-exist (specifically motorized and non-motorized users).
- One commentor expressed that they would like to see more education surrounding the plan and plan implementation.

Board Member Feedback:

- We need to educate the public about the plan.
- Guidelines on kiosks, brochures and signs have never been implemented and should be deleted or updated to something feasible. (2-60)

Work Session Feedback/Notes:

- P. 2-60. Install an educational sign on the Recreation Rivers at the Talkeetna Boat launch and other access points including all public boat launches such as Deshka Landing or anywhere people can access the Recreation Rivers.
- P. 2-60. DNR should research funding opportunities for educational kiosks at access points.
- P. 2-60. *Brochures*. Brochures are a great idea.
- P. 2-60. *Signs*. Add a QR code on the signs – in conjunction with a web-based survey this could help provide data on use and educate people. Install signs that mention “pack in, pack out” and other information on rules and best practices within the corridors.

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Enforcement -- Page 2-61

Scoping Feedback:

- Several commentors questioned whether or not many of the provisions of the original plan were ever implemented. They would like to see greater implementation in the future.
- Several commentors would like to see greater enforcement in the corridors.
- Commentors would like to see funding to DNR for enforcement and implementation of the plan.

Board Member Feedback:

- Lack of enforcement and implementing the plan. This is by far my biggest concern.
- Enforcement – never happened because DNR was never granted authority to issue citations. Statute doesn't exist that grants authority to issue citations on the Recreation rivers. Need a "regulations package" as termed by the State of Alaska. (2-61)
- Enforcement authority / citation authority is a big deal. Renders the plan unenforceable.

Work Session Feedback/Notes:

- P. 2-61. Can we set up a staff position with joint MSB-State funding to patrol the area?
- P. 2-61. Make recommendations for additional enforcement – keep within spirit of the Recreation Rivers' statute. Permit receipts are not enough to fund even one position to manage the corridors. Funding has been and will continue to be the limitation.
- Perhaps look into getting volunteers for enforcement on the Recreation Rivers. Volunteers could conduct use counts and help with clean ups. They can also serve as Camp Hosts. Volunteers cannot perform enforcement activities.
- Maybe add a bail schedule to the regulations package to allow for writing citations.
- Include a recommendation to fund a peace officer – as suggested in the Recreation Rivers statute.

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Phasing & Interim Management -- Page 2-62

Scoping Feedback:

- No specific comments related to Phasing & Interim Management.

Board Member Feedback:

- Lack of enforcement and implementing the plan. This is by far my biggest concern.
- P. 2-62. Regulations and implementation. The phased approach was never funded or implemented, and this needs a rewrite. Also, a regulation was adopted that codified the entire plan. This has never been done before with a state management plan and is too broad of an implementation strategy and should be deleted and specific regulations (if determined necessary) adopted. As previously mentioned, each reference in this plan to regulations should be evaluated and the plan updated to reflect current situation.

Work Session Feedback/Notes:

- P. 2-62. Remove the section on *Phasing and Interim Management* entirely.



CHAPTER 3: LAND & WATER MANAGEMENT POLICIES FOR EACH UNIT

- In all subunits either put “Class II” (e.g.) in the Header or move the Management Intent section in front of the Background section. Consensus was to put the Class in the Header.
- Maybe remove all *Special Regulations* throughout Chapter 3?

❖ Management Intent -- Page 3-1

Little Susitna River Management Unit -- Page 3-07

Scoping Feedback:

- Commentors are concerned about diminishing fish runs in the river.
- Several commentors expressed concern over damage to spawning areas from motorized use. These concerns included motorized boats (jetboats and airboats mentioned) disrupting spawning beds and ATVs crossing streams and damaging stream corridors. The Little Susitna was mentioned several times.
- One commentor indicated that the Little Susitna has an important weir.
- A few commentors mentioned that they have issues with trespass through their properties by people trying to access the corridors. This was specifically mentioned for the Little Susitna by a few commentors.
- A few commentors expressed that they would like to see some restrictions on motorized use enforced in the corridors to limit bank erosion, damage to fish spawning areas, dangerous traffic and noise pollution. The Little Susitna was specifically mentioned by several. Jetboats, airboats, ORVs specifically mentioned.

Work Session Feedback/Notes:

- P. 3-8. River characteristics are probably quite similar.
- P. 3-8. Update *Sport Fishing* section – not many sockeye anymore. There is pike in Nancy Lake. Update to reflect greatly diminished king salmon.
- P. 3-9. Update *Wildlife Section*.
- P. 3-9. *Camping* section -- much less camping now because of the fishery.

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- P. 3-9. *Access*. Little Susitna public use facility is improved and access is better. *Access* section still largely correct. Most boat traffic used to be 50 horsepower – it's much higher now. Less non-motorized use. Kayaking is less common because there are many sweepers these days.
- New MEA power line – note that it may open a lot of access.
- P. 3-10. The extension of South Big Lake Road was never developed.
- Mention possible West Susitna Access road crossing?
- P. 3-10. *Boating Restrictions*. No-wake area signs can be dangerous depending on flow rate. Need no-wake areas to be dependent on water level. Could necessitate local onsite folks to monitor.
- P. 3-10. *Boating Restrictions*. Consider removing the alternating weekends for powerboat users and non-powerboat floaters.
- P. 3-10. *Boating Restrictions*. Is there a way to regulate based on water depth/flowrate? When depth is less than 4 inches no jetboats should be allowed when spawning is active.

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1a. Lower Little Susitna River Subunit -- Page 3-11

Scoping Feedback:

- One commentor requested that the corridor boundary of the Little Susitna be extended to include a Public Use Site on Ayrshire Avenue. This area is part of the Susitna Flats State Game Refuge.
- One commentor suggested that the Susitna Flats State Game Refuge should be considered for incorporation into the river corridors as was suggested in the original plan.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-11. *Camping*. Delete figures based on the 1989 survey on camping here and throughout plan.
- P. 3-11. *Background*. South Big Lake Extension (again) – probably didn't happen. Also, was Winnebago Road constructed?
- P. 3-12. *Iditarod Trail*. Race trail no longer goes through this section -- except the Junior Iditarod trail does.
- P. 3-12. Unauthorized Cabin is no longer there -- delete.
- P. 3-13. Delete Recommendation #3 on Susitna Flats State Game Refuge.
- P. 3-13. Delete language about DNR promulgating regulations for the Nancy Lake State Recreation Area – these regulations were adopted.
- P. 3-14. *Special Management Areas*. Big Lake Extension Road – SMA 1a.1. Evaluate this for possible changes or deletion.
- P. 3-14. *Cooperative Management Agreement*. Leave this in – it hasn't happened yet.
- P. 3-14. *Additions to Recreation Rivers*. Delete this section.

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1b. Middle Little Susitna River Subunit -- Page 3-15

Scoping Feedback:

- Several commentors expressed concerns over increased rates of bank erosion within the corridors, water quality and the degradation of riparian areas. The Little Susitna was specifically mentioned several times.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-15. *Management Intent*. If regulation is updated regarding non-motorized areas, make conforming change.
- P. 3-16. 1b.1. George Parks Highway Bridge. Change to “two developed parking facilities” ... on the north side of the bridge. Delete “bank fishing” and say “Day use is popular.”

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1c. Upper Little Susitna River Subunit -- Page 3-17

Scoping Feedback:

- Concerns over habitat degradation and impacts to water quality from the proposed Matanuska Electric Association's Fishhook to Pittman Transmission line were also brought forth.
- One commentor would like to see an emergency egress off Champion Road on the Little Susitna.
- One commentor stated that the upper Little Susitna River is a productive salmon sanctuary that deserves to be protected.
- One commentor specifically mentioned increased usage on Bald Mountain Trail along the Little Susitna that has led to rutting and litter.
- One commentor noted that it difficult to determine fish counts in the North Susitna area due to a lack of fish weirs.
- One commentor expressed concern that trees were being harvested in the Little Susitna corridor for bonfires.
- A few commentors expressed that they would like to see some restrictions on motorized use enforced in the corridors to limit bank erosion, damage to fish spawning areas, dangerous traffic and noise pollution. The Little Susitna was specifically mentioned by several. Jetboats, airboats and ORVs specifically mentioned.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-17. Correct spelling of Sushana.
- P. 3-18. *Grazing*. The Deception Creek Plan has been superseded by an area plan.
- P. 3-18. *DOTPF Materials Site*. Update materials site section if necessary.
- P. 3-18. PU1c.3. Change from "fishing" to "camping".

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Deshka River Management Unit -- Page 3-19

Scoping Feedback:

- Commentors are concerned about diminishing fish runs in the river.
- At a site visit along the Deshka River, plan staff learned of many different historic sites within the corridors and about the research that is being done on many of these sites. These sites should receive continued protection.

Work Session Feedback/Notes:

- P. 3-20. *Sport Fishing* needs a rewrite – probably throughout the plan.
- P. 3-20. *River Characteristics*. This is the warmest river in the Matanuska-Susitna Valley. Mention the cold water refugia study and other studies in this section – also update to current conditions on fish populations and use.
- P. 3-21. Special Regulations – probably still in place.
- P. 3-21. *Wildlife*. Update here and throughout the plan.
- P. 3-21 *Camping*. Remove mentions of 1989 survey.
- P. 3-21. *Access*. Oil Well Road goes to Kahiltna River now – another 20 miles.
- P. 3-22. *Boating Restrictions*. #3. Colton checking on recommended Board of Fish opening to King salmon fishing. Delete this part if appropriate.
- P. 3-22. *Boating Restrictions*. #4 delete about *safety warning sign*. Update to reflect river has moved.

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2a. Mouth of Deshka River Subunit -- Page 3-23

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-23. *River Characteristics*. Mention erosion that has occurred at the mouth of the Deshka.
- P. 3-23. *Camping and Development* sections need much updating.
- There is now an airstrip here that the state has made public.
- P. 3-24. *Water-dependent Structures*. Update information on Alaska Boating Association maintaining buoys.
- P. 3-25. *Camping Limits*. Update to reflect the conveyance to the state at the mouth of the Deshka.
- P. 3-25. #1-4. Delete much of this. Public airstrip is established. Conditions have changed such that much of this language isn't needed.
- P. 3-25. #1. *Consider closing the primitive airstrip*. The MSB now owns this airstrip – provides access to Deshka River Lodge.
- P. 3-25. #2. *Develop a landing pattern*. Consider deleting.
- P. 3-25. #4. *Exercise Option to convert private strip to public strip*. This strip was issued by DNR to DNR as a ROW for public access in 1993.
- P. 3-25. *Consistent Management of the Mouth area*. Update this section.
- P. 3-26. *Department of Fish and Game Site*. This info seems good.
- P. 3-26. *Public Information*. Contact station is still there but now MSB land.

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2b. Lower Deshka River Subunit -- Page 3-26

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-26. Update *Fisheries, Wildlife and Camping* sections here and throughout the plan.
- P. 3-27. *Management Guidelines. Commercial Camps.* Maintain limit of two commercial camps.

2c. Middle Deshka River Subunit -- Page 3-28

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- No specific feedback related to this subunit.

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2d. Neil Lake Subunit -- Page 3-29

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-29. *Development*. Neil Lake is now surrounded by private property.
- P. 3-30. *Access to Neil Lake* – The desired access mentioned has been established with donated land (OSL 1121).

2e. The Forks Subunit -- Page 3-31

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-31. *Access*. The seismic line crossing the river at RM 27.8 is a very popular trail now.
- P. 3-31. *Management Intent*. Update: "...public access to the river from the lake should be maintained and improved."
- P. 3-32. PU 2e.1 The Forks is not a very popular camping site now. Reevaluate this site.

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2f. Kroto Creek Subunit -- Page 3-32

Scoping Feedback:

- One comment specifically mentioned the need for a larger parking area along Petersville Road due to congestion for winter use.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-32. *Access*. Note bridge over Moose Creek has been built. Note the greatly increased winter use. Parking area west of Kroto Creek bridge for trails heading north along Kroto Creek should be enlarged.
- P. 3-33. *Management Guidelines* – note that the Oilwell Road bridge across Kroto Creek was built.
- P. 3-33. *Management Guidelines*. Oilwell Road extensions mentioned at bottom of page should be updated. One can drive to Amber Lake now.
- P. 3-34. *Special Management Areas. SMA 2f.2. Petersville Road Crossing*. Mention material site in this area.

2g. Lower Moose Creek Subunit -- Page 3-35

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-35. *Unauthorized cabins*. Is the US Air Force cabin that is mentioned still there?

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2h. Oilwell Road Subunit -- Page 3-36

Scoping Feedback:

- One comment specifically mentioned the need for a larger parking area along Petersville Road due to congestion for winter use.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-36. Add to *Development* section the potential for a major tourist development esp. in conjunction with the South Denali development. Companies might bus tourists down Petersville Road. Also, the Oilwell Road bridge span has been built.
- P. 3-36. *Access*. It is much less than 150 people per week starting float trips now.
- P. 3-36. *Management Intent*. This section still reads pretty good.
- P.3-37. *Public Facilities*. Section needs updating.
- P.3-37. *Public Use Sites*. PU 2h.2. Update information on this public use site.

2i. Upper Moose Creek Subunit -- Page 3-37

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-38. *Management Intent*. K'da Lake has NOT been added to the Recreation Rivers.
- P. 3-38. *Special Management Areas*. SMA 2i.1 and 2i.2: Consider deleting these. Why was 2i.2 proposed for addition to the Recreation Rivers?

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Talkeetna River Management Unit -- Page 3-39

Scoping Feedback:

- Commentors are concerned about diminishing fish runs in the river.
- A few commentors mentioned that they would like to see a new public put-in on the Talkeetna River.
- Several commentors would like protections for the Talkeetna River to stay in the plan, particularly because of the large impact of climate change.
- One commentor indicated that the Talkeetna River is a location where ADFG measures escapement.
- A few commentors expressed that they would like to see the Talkeetna River corridor extended past Yellow Jacket Creek to protect access for floaters.
- Commentors stated that improved air access is needed to the Talkeetna.

Work Session Feedback/Notes:

- There is much less traffic now than before on the Talkeetna River.
- The US Coast Guard deems the Talkeetna a navigable river, like a highway, so the state can't charge fees.
- P. 3-40. River Characteristics. Update this entire section including revising the 100-year flood information and the flow rates.
- P. 3-41. Special Regulations. Update this section.

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3a. Lower Talkeetna River Subunit -- Page 3-41

Scoping Feedback:

- One commentor is concerned about the management of the Public Use Sites at the mouths of Larson and Clear Creeks and how bank erosion has impacted these sites.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-42. *Camping.* Larson Creek attracts large camps that stay for a week or longer.
- P. 3-42. *Development.* The old Railroad cars have been removed as well as the cable crossing. There is no kiosk at the boat launch but there should be. Expand description of the sewage plant?
- P. 3-42. *Access.* Bartlett Earth station is now called Talkeetna Alaska Teleport.
- P. 3-42. *Access.* Larson Creek was quiet in the 90's – now it's crowded. The Talkeetna River Trail provides easy access for ATV's as well as boat access. People self-police well. According to Sam Ivey (ADFG), this is the hottest spot on the Talkeetna.
- P. 3-42. *Access.* Regarding the boat launch at Talkeetna: it needs to be dredged about 300 yards – boaters get stranded here often. There is not much good safe public access to the Talkeetna River.
- P. 3-42. *Access.* Just below the Railroad bridge in Talkeetna there is a dike on the left. A harbor with a public boat launch could be installed here. The land is owned by AKRR, but MSB could lease it.
- P. 3-43. *Public Use Sites.* PU 3a.2. *Boat Launch and Campground.* The outhouse here needs to be upgraded.
- P. 3-43. *Public Use Sites.* PU 3a.3. *Larson Creek Mouth.* Consider installing outhouse here.
- P. 3-43. *Public Use Sites.* PU 3a.4. *Sheep River.* No one camps here. There's a small amount of fishing. Consider deleting this public use site.

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3b. Middle Talkeetna River Subunit -- Page 3-43

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-44. *Development*. There are more than 3 cabins now.
- P. 3-44. PU 3b.1. Disappointment Creek Junction. Jet boat technology has improved and these days the mouth of Disappointment Creek on the Talkeetna is busy. It is beautiful and a bit remote.
- P. 3-44. PU 3b.2. Iron Creek Junction. Rafters use this site currently.

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3c. Clear (Chunilna) Creek Subunit -- Page 3-45

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-45. Clear Creek – maybe two guide boats and 12 people fishing – used to be 100. Less pressure than in the past due to diminished king salmon run.
- Note: Fourth of July Creek is a tributary of the Susitna and outside of the Recreation River corridors.
- P. 3-45. *Development*. This is no Clear Creek Lodge anymore.
- P. 3-45. *Access*. Check the number of airstrips.
- P. 3-46. *Management Guidelines. Boating Restrictions*. A jet boat can operate in 3 inches of water. When we have low water at Clear Creek (prime King salmon habitat) can we limit jet boats at places where the creek is just a trickle, esp. during July when spawning is happening? Some spawning creeks like Fourth of July Creek have gone totally dry for a whole year.
- P. 3-46. *Land Exchange*. Delete this section.
- P. 3-46. *Public Use Sites*. PU 3c.1. Install a box toilet at mouth of Clear Creek. Also, Fish Creek no longer flows into Clear Creek. Update PU 3c.1 description.

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3d. Talkeetna River Canyon Subunit -- Page 3-46

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-47. Upper Talkeetna Canyon and Prairie Creek should be added as a Recommended Addition to Recreation Rivers.
- P. 3-48. Leave *Voluntary Trip Scheduling Program* in here.

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Lake Creek Management Unit -- Page 3-49

Scoping Feedback:

- Several commentors expressed that they would like the levels of development to remain as they are. One commentor specifically mentioned Lake Creek as being “busy”.

Work Session Feedback/Notes:

- P. 3-50. *Background*. Add to this section: the Mouth of Lake Creek changed in 2012 when the active channel moved west. Some permitted cabins were lost.
- P. 3-50. *Background*. Many mining claims about the LDA in the Lake Creek area; but there are no active mining claims in the LDA.
- P. 3-50. Update *Fisheries* and *Special Regulations* sections.
- P. 3-50. *Fisheries*. Lake Creek is closed for kings, but coho are still being fished and rainbow fishing is good. There are pike in the system.
- P. 3-51. *Access*. About 5 miles up Lake Creek rocks impede further travel by jet boat. Jetboat travel up past Yenlo Creek would be very difficult or impossible.
- P. 3-51. *Boating Restrictions*. One board member didn’t like the limit to non-motorized only – maybe a mini-jetboat or raft with jet power could go further up the Creek.
- P. 3-51. *Access*. Reference the RS-2477 trail at Sunflower Creek.

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4a. Lake Creek Mouth Subunit -- Page 3-52

Scoping Feedback:

- One commentor specifically stated that they would like to see motorized boat access in Lake Creek and Bulchitna Lake unchanged so that they can continue to access their private property.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-52. *River Characteristics*. Recognize that the channel at the mouth has moved during 2012 flood event.
- P. 3-52. *Development*. Update this section – some lodges are now on the dead channel.
- P. 3-52. *Access*. There are many ATV trails that people tow boats on from Bulchitna Lake to Lake Creek.
- Note that McDougall trail is an RS-2477 (RST#136).
- P. 3-53. *Management Guidelines. Public Access*. “The trail currently used crosses private land.” This is not true anymore. There is now a well-developed trail on south side on DNR land.
- P. 3-53. *Field Staff Cabin*. This cabin was never built so change the heading of the section and remove mention of the cabin in this section.

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4b. Lower Lake Creek Subunit -- Page 3-54

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- No specific feedback related to this subunit.

4c. Middle Lake Creek Subunit -- Page 3-56

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-57. *Management Intent* and *Management Guidelines*. Update these sections. There are no active mining claims in the corridors, but many nearby.
- P. 3-57. *Management Guidelines. Mining Locations*. Delete this section.
- P. 3-57. *Unauthorized Cabin*. The cabin on Shovel Lake had been removed so delete this section.
- P. 3-57. *Special Management Areas. SMA 4c.1*. Add mention of an airstrip west of Quiet Lake.

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4d. Upper Lake Creek Subunit -- Page 3-59

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-60. *Mining*. Find out if anyone is mining under a lease (claims are not allowed).
- P. 3-61. *Public Use Sites. PU 4d.2. Sunflower Creek Junction*. Confirm with DFG and add mention of the DFG weir camp at Sunflower Creek if appropriate.

4e. Chelatna Lake Subunit -- Page 3-61

Scoping Feedback:

- One commentor indicated that Lake Creek (Chelatna Lake) is a location where ADFG measures escapement.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-61. *Fisheries*. Add a Fisheries section. Confirm existence and if appropriate add mention of a DFG weir camp and of DFG pike-eradication efforts within this subunit.
- P. 3-61. *Development*. Note that there is now only one lodge that operates in the summer on Chelatna Lake. The CIAA camp is now used by DFG for pike eradication. There is no longer a cable over the river.
- P. 3-62. *Chelatna Airstrip*. This airstrip parcel is no longer in BLM ownership.

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Talachulitna River Management Unit -- Page 3-65

Scoping Feedback:

- Commentors are concerned about diminishing fish runs in the river.
- Additional snow machine traffic on the Talachulitna was specifically mentioned as a potential nuisance to moose populations.

Work Session Feedback/Notes:

- P. 3-66. *Development*. There are two active lodges: Talvista and Talaview Lodges. In addition, the Talstar “lodge” is a timeshare owned by individual pilots. The inactive lodge across from the Talaview is being destroyed by the river.
- P. 3-66. *Development*. Add mention of the State Trooper enforcement cabin in this area.
- P. 3-66. *Fisheries*. There is great rainbow trout fishing and still a catch and release King salmon season – 4000-5000 kings in 2022.

5a. Mouth of Talachulitna River Subunit -- Page 3-68

Scoping Feedback:

- One commentor indicated that the proposed location of the West Susitna Access Road includes construction of a bridge at the confluence of the Talachulitna and Skwentna Rivers within the corridor. The commentor states that this is a popular landing location for float planes and a bridge in this location would cause a conflict.

Board Member Feedback:

- Management guidelines state that there are 73 Public Use Sites identified. Is this still the case? None exist on the Talachulitna. Perhaps these should be eliminated if they do not exist.

Work Session Feedback/Notes:

- P. 3-68. Access: Add helicopters and jetboats.
- P. 3-69. PU 5a.1. USGS Gaging Station. The Skwentna canyon floatplane landing is very technical – and this is the site where West Susitna Access Road would cross.

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5b. Talachulitna River Canyon Subunit -- Page 3-70

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- Management guidelines state that there are 73 Public Use Sites identified. Is this still the case? None exist on the Talachulitna. Perhaps these should be eliminated if they do not exist.

Work Session Feedback/Notes:

- P. 3-70. *Access.* There are more helicopters now. Jet boat access is very difficult.

5c. Middle Talachulitna River Subunit -- Page 3-73

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- Management guidelines state that there are 73 Public Use Sites identified. Is this still the case? None exist on the Talachulitna. Perhaps these should be eliminated if they do not exist.
- Only 3 parties floated river (entire river?) – beetle kill means tons of wood in the water in the upper section. Some people float from the Mid-Tal area.
- Lots of aircraft use up and down the river. From Mid-Tal up lots of sandbar landing sites are being used.
- Lots of jet boat traffic goes from Mid-Talachulitna almost up to Trinity.

Work Session Feedback/Notes:

- P. 3-73. *Access.* The “primitive” landing area behind Talaheim Lodge is not so primitive anymore.

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5d. Talachulitna Creek Subunit -- Page 3-75

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- Management guidelines state that there are 73 Public Use Sites identified. Is this still the case? None exist on the Talachulitna. Perhaps these should be eliminated if they do not exist.

Work Session Feedback/Notes:

- P. 3-75. *Background*. There is now good king salmon fishing (catch and release) here.
- P. 3-75. *Access*. Helicopters are the only significant form of access.
- P. 3-75. *Management Intent*. This subunit now receives rare use, not “moderate” use.
- P. 3-76. *Public Use Sites*. PU 5d.3. *Unnamed site*. This site has a creek called Danielle Creek. Research updating the creek and site names. Mention cabin on this creek.



5e. Judd Lake Subunit -- Page 3-76

Scoping Feedback:

- One commentor indicated that the Talachulitna River (Judd Lake) is a location where ADFG measures escapement.

Board Member Feedback:

- Management guidelines state that there are 73 Public Use Sites identified. Is this still the case? None exist on the Talachulitna. Perhaps these should be eliminated if they do not exist.

Work Session Feedback/Notes:

- P. 3-76. *Wildlife*. Many bald eagle nests now.
- P. 3-76. *Camping*. Camping is very restricted on the lake – some people camp on the inlet. This is now a private parcel with a severe human waste issue. Consider adding a designated camping site on the lake.
- P. 3-76. *Development*. About 2020 DFG put in a weir and a DFG cabin site on Judd Lake. There are now 9 distinct cabins aside from the Tordrillo Mountain Lodge complex. Change Silvertip Lodge to Tordrillo Mountain Lodge.
- P. 3-76. *Access*. There is a private air strip now. Change Silvertip Lodge to Tordrillo Mountain Lodge.
- P. 3-77. *Management Guidelines. Acquisition of Private Lands*. This is a private parcel still with two cabins.
- P. 3-77. *Public Use Sites. PU 5e.1. Judd Lake*. This site now has two cabins. This site is now private land. Note that if this was purchased in a state land sale there is a “to and along easement” on the creek. There is another site with deeper near-shore waters that would be a better place for floatplanes to drop off rafters than here.
- P. 3-77. The Recreation Rivers corridor should extend from Judd Lake to Talachulitna Lake. Add this parcel to the Legislatively Designated Area (LDA).
 - Note Talachulitna Lake is already within the Recreation Rivers corridors.

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5f. Upper Talachulitna River Subunit -- Page 3-78

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- Management guidelines state that there are 73 Public Use Sites identified. Is this still the case? None exist on the Talachulitna. Perhaps these should be eliminated if they do not exist.

Work Session Feedback/Notes:

- No specific feedback related to this subunit.

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Alexander Creek Management Unit -- Page 3-79

Scoping Feedback:

- Commentors are concerned about diminishing fish runs in the creek.
- A few commentors expressed concern that additional access from the West Susitna Access Road would bring in more traffic and be harmful to fish and wildlife populations. A crossing in the Sucker Creek confluence with Alexander Creek would be harmful to the spawning of Chinook salmon.

Work Session Feedback/Notes:

- P. 3-80. *River Characteristics*. The river is warmer, slower, and weedier now.
- P. 3-81. *Development*. During the 1991 plan process, there were 10 lodges on Alexander Creek and 40-50 people living in the area year-round. Now there are no lodges and only about 10 people living there year-round or mostly year-round. There are more recreational cabins.
- P. 3-80. *Sport Fishing*. Sport fishing has declined. No sockeye. People fish pike in Alexander Lake but don't pay to fly in to do it in lower Alexander Creek.
- P. 3-81. *Access*. Very few boats come across from Anchorage now. There are still floaters, but fewer. Lots of float plane access. People use airboats and take jetboats up to Alexander Lake.
- P. 3-82. *Management Guidelines for this Unit. Boating Restrictions. #1*. The non-motorized provision above Sucker Creek has never been enforced – there are more airboats now.

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6a. Lower Alexander Creek Subunit -- Page 3-83

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-83. *Development*. There are at least 30 mostly recreational cabins now. Around a dozen people live here year-round or mostly year-round.
- P. 3-83. *Access*. The trails along section lines aren't receiving heavy summer use now, but the trail to the airstrip is. Recreational cabins are used more in winter than summer – accessed by snow machines. The Beluga gas line is now used mainly as a trail – there used to be an ice road in winter, but it's too warm now.
- P. 3-83. *Management Intent*. The mouth of Alexander Creek is now MSB land, not state land. The mouth of the river is closed to king fishing but still good for silvers in July and August. The grayling and trout fishing upstream is excellent.
- P. 3-84. Delete *Addition to the Recreation River*. It's all private land now.
- P. 3-84. *Public Use Sites. PU 6a.1. Alexander Creek Mouth*. This is now MSB land designated for recreational use. This site is no longer usable for plane landings due to brush. People camp here occasionally. The last three public use sites listed here aren't as good for camping as they used to be.

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6b. Upper Alexander Creek Subunit -- Page 3-85

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-86. *Management Guidelines. Boating Restrictions.* Airboaters go up Alexander Creek now. Jet boats shouldn't go here.
- P. 3-86. *Special Management Areas. SMA 6b.1.* Check out leases at Rose Lake – maybe delete this SMA if appropriate.

6c. Alexander Lake Subunit -- Page 3-87

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-87. *Development.* Alexander Lake Lodge is not being used in the summer, but possibly is used privately in the winter.
- P. 3-88. *Land Acquisition.* Check on this – did the state ever acquire an upland parcel here?
- P. 3-88. *Solid Waste.* Check on the solid waste dump with DEC and update this section if appropriate.

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6d. Sucker Creek Subunit -- Page 3-89

Scoping Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Work Session Feedback/Notes:

- P. 3-89. *Access.* There are fewer wheeled planes landing on the gravel bar at RM 20.6 now.



CHAPTER 4: IMPLEMENTATION

General Comments on Implementation Chapter

Public Feedback:

- What we have before us is a well-intentioned plan with no teeth in it which means protections can get eroded. We recognize that the original advisory board became defunct over the 30 plus years since the plan was created. And there was no real implementation that the public really ever saw.
- The Implementation chapter should identify educational, enforcement, and budgetary needs and possible solutions to address those needs. This would help state managers and state legislators who approve budgets so they could focus some of their attention on these issues. A great example is the Alaska Long Trail project. Those plans help drive state policy making and funding.

Board Member Feedback:

- P. 4-2 through 4-6. The plan needs new language that allows flexibility to consider...1) New information, 2) site specific conditions 3) agency comments on a specific application. The land managers need to be able to evaluate applications with current information and site-specific data. This is particularly important for plan guidelines that affect access to private property and property owners use of nearby lands and waters.

Board Member Meeting Feedback:

- Fees. Easy to collect fees from commercial users. Should collect fees from private users too so it's fair for everyone. Maybe using a stamp or sticker.
- Education. Education would help negate the need for enforcement, to some extent. Very few people even know the Recreation Rivers plan exists. If educated, most people will follow the rules. Add intent language to this chapter that states that education is the primary goal.
- Implementation is very important, especially Education. Property owners could be mailed a one or two-page description of the rules. Also, signage at prominent access areas could help educate users.

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Introduction -- Page 4-1

Public Feedback:

- No specific feedback related to this section.

Board Member Feedback:

- No specific feedback related to this section.

Board Member Meeting Feedback:

- No specific feedback related to this section.

Areas Recommended for Designation as Recreation Rivers -- Page 4-1

Public Feedback:

- P. 4-2. Support adding the extension in the Talkeetna Canyon, subunit 3d, to River Mile 51.5 just above the mouth of Prairie Creek. This would include a public use site. Air taxis who fly rafters in, and other members of the public support this to protect the still current uses.

Board Member Feedback:

- No specific feedback related to this section.

Board Member Meeting Feedback:

- The areas recommended in the 1991 plan for addition to the corridors have not been added. Some board members were in support of adding the Upper Talkeetna area (P. 4-2 #5) including Prairie Creek, because that drainage is so imperative to saving the Talkeetna king salmon.

Procedures for Plan Review, Modifications & Amendment -- Page 4-3

Public Feedback:

- P. 4-5. Are these still relevant? What about #5. Recommended Statute Change for Public Notice Requirements?



Board Member Feedback:

- P. 4.3. *Periodic Review*: “The planning team advisory board should be consulted annually to evaluate plan implementation. The plan will be reviewed approximately once every five years to determine if revisions are necessary. An inter- agency planning team and the Recreation Rivers advisory board will coordinate this review. This revision should be consistent with AS 41.23.430 - .440 in the Recreation Rivers Act.” This section should be deleted and changed to something more like this:

“This plan should be reviewed and updated as new information becomes available and conditions change. As there’s no specific timeline for future reviews it’s important that land managers have the flexibility to make decisions over a 20-year or more period that consider changing conditions and updated information. When making plan implementation decisions of land use applications the comments of other agencies and the public must be given equal or greater weight than broad area wide guidelines. Future land managers are to make use of the minor change and special exceptions provisions of plan implementation when reviewing specific land use applications. This is especially important when dealing with issues related to private property access.” We need to have the flexibility to change things that don’t make sense, especially for private landowners that are affected by the plan.

Board Member Meeting Feedback:

- P. 4-5. *Discretion within Guidelines*. Ambiguity and the opportunity for interpretation by DNR should remain in the plan language.
- P. 4-3. *Periodic Review*: “The planning team advisory board should be consulted annually to evaluate plan implementation. The plan will be reviewed approximately once every five years to determine if revisions are necessary. An inter- agency planning team and the Recreation Rivers advisory board will coordinate this review. This revision should be consistent with AS 41.23.430 - .440 in the Recreation Rivers Act.” This section should be deleted and changed to something more like this:

“This plan should be reviewed and updated as new information becomes available and conditions change. As there’s no specific timeline for future reviews it’s important that land managers have the flexibility to make decisions over a 20-year or more period that consider changing conditions and updated information. When making plan implementation decisions of land use applications the comments of other agencies and the public must be given equal or greater weight than broad area wide guidelines. Future land managers are to make use of the minor change and special exceptions provisions of plan implementation when reviewing specific land use applications. This is especially important when dealing with issues related to private property access.” We

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need to have the flexibility to change things that don't make sense, especially for private landowners that are affected by the plan.

Trails Action Plan -- Page 4-6

Public Feedback:

- P. 4-6. *Trails Action Plan*. Is this still necessary? The Matanuska-Susitna Borough has its own Recreational Trails Plan. Does the state have its own plan?

Board Member Feedback:

- P. 4-6. *Trails Action Plan*. Another good idea that wasn't implemented. This should be rewritten to reflect the current situation.

Board Member Meeting Feedback:

- P. 4-6. *Trail Mapping*. DNR should contact MSB to incorporate any trail data for maps.

Other Recommendations -- Page 4-7

Public Feedback:

- P. 4-7. *Recreation Rivers Advisory Board*. Seems like the existence of the advisory board is necessary for plan implementation in consultation with the ADNR Commissioner. The Board would provide the flexibility with the issues that come up. Without a board, how can reviews, management regulations and updates happen? The public and user groups won't be represented.
- P. 4-7. *Susitna Area Plan (SAP) Update*. SAP was updated by the 2008 Southeast Susitna Area Plan and the 2011 Susitna Matanuska Area Plan (SMAP). The SBRRMP recommended that the SAP update would recommend that Yellow Jacket Creek on the Upper Talkeetna River be reserved for public access. "The landing area located there is one of the few public access points for float trips down the Talkeetna River." This area is unit L03 designated and classified as habitat in SMAP. It is in the legislatively designated Nelchina Public Use Area under AS 41.23.010, AS41.23.020. There has been no management plan. SMAP has no mention of a public access reservation. I think the Board should still recommend a public use access designation so that option exists especially with changing climate conditions.

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- P. 4-7. *Enforcement*. Should peace officers be designated to enforce? Should DNR seek citation authority? (P. 4-7)
- P. 4-7. *Monitoring*. States that successful management programs require systematic monitoring. Without monitoring, a lot of the Plan is in vain. But does ADNR have the staff and/or can they co-monitor with other state agencies?

Board Member Feedback:

- No specific feedback related to this subunit.

Board Member Meeting Feedback:

- P. 4-7. *Enforcement*. Enforcement authority is already in the plan, but it was never implemented.
- P. 4-7. *Enforcement*. Recommendation to fund an enforcement officer to police the area would have to go through the Legislature.
- P. 4-7. *Enforcement*. State Troopers Fish and Wildlife can enforce fish and wildlife violations, but they can't enforce land use regulations relating to the Recreation River Corridors.
- P. 4-7. *Enforcement*. A peace officer should be funded to help enforce the Recreation River regulations. A head tax for everyone who uses the rivers could fund the position maybe. Or another mechanism to get users to pay. (Note: this could run afoul of the 2010 court case State v. Alaska Riverways, Inc.)
- P. 4-7. *Enforcement*. Enforcement is necessary. There is a lot of ambiguity, which can be good if common sense prevails. Some of the ambiguity is addressed on p. 4-5 Discretion within Guidelines. One officer will not be enough to enforce such a large area. Fish and Game officers could help. Volunteers are not a good idea – could be dangerous for the volunteers if they have a bad encounter with someone. The ultimate interpretation of any enforcement actions should be political so there is some accountability – bureaucrats alone should not be able to make those enforcement action decisions in a void.
- P. 4-7. *Monitoring*. Design plan so monitoring gets in if usage ramps up in certain areas so that the DNR knows what is happening in an area and can address any problems that are occurring.

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Agency Implementation Responsibilities -- Page 4-9

Public Feedback:

- No specific feedback related to this subunit.

Board Member Feedback:

- No specific feedback related to this subunit.

Board Member Meeting Feedback:

- No specific feedback related to this subunit.