



June 22, 2020

Mr. Emerson Krueger
Matanuska-Susitna Borough
Community Development Department
350 East Dahlia Avenue,
Palmer, AK 99645

RE: Jonesville Public Use Area Management Plan

Dear Mr. Krueger,

I have received your cover letter and the proposed Mat-Su Borough Jonesville Public Use Area plan. It is obvious that considerable time and effort went into this document and for that I thank you. Upon quick review, I see several issues that will need correction before the plan can be finalized. Division of Mining, Land & Water staff have been clear from the beginning that a plan developed by the borough is not a State sanctioned plan. That said, a plan prepared and adopted by the borough could be considered for possible adoption by the State if it meets all the statutory and regulatory criteria, and is consistent with the management intent for state land within the planning area. This plan, as presented, does not meet that criteria. While DNR was consulted along the way, the Department has not participated in the preparation of the proposed plan. Importantly, until DNR takes an action to adopt the plan, the DNR logo must be removed from the front cover.

It is clear from the text that the plan is written from the DNR perspective, as if written by DNR staff. Throughout the plan there are references as to what DNR "will", "shall" or "will not" do concerning the management of the area contained within the plan boundaries. Since the Division and the Department have had no significant input into the plan, the Department cannot stipulate to what it will or will not do to manage the Jonesville Special Use Area.

As a reminder, the passage of the bill that established the Jonesville Special Use Area contained a zero fiscal note. During the bill preparation, DMLW consistently communicated that a zero fiscal note would put the planning process for this area in the queue and the plan would be worked on as time and staff allowed. To date, DMLW's RADS group has been inundated with in-progress planning efforts addressing several high priority Department actions, and staff have not been available to participate in the preparation of the proposed Jonesville plan.

Prior to the proposed plan moving forward for State consideration, there would need to be a robust agency review and significant edits in order for the plan to meet the criteria set out in statute and regulation. At this time, however, DMLW does not possess the staff or resources necessary to take up the planning effort for the Jonesville Special Use Area.

We recognize that this plan is important to the MatSu Borough and the people of the Sutton area, and DMLW has committed to Rep. Rauscher that we will review the plan and work with the MatSu Borough

Page 2 of 2

June 22, 2020

Jonesville Special Use Area

in the development of a public review draft when the time and resources allow. We appreciate your patience and understanding.

Sincerely,

A handwritten signature in blue ink, appearing to read "Martin W. Parsons". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Martin W. Parsons

Director, Division of Mining, Land & Water