

Tom Irwin, Commissioner  
Department of Natural Resources  
550 W Seventh Avenue, Suite 1400  
Anchorage, Alaska 99501

Re: Request for Reconsideration:  
Parcel U-23/Bullion Mountain Scenic Site #90  
And Name Change

Dear Mr. Irwin: The Community of Willow respectfully requests reconsideration of the land classification designation for one of Willow's and the Susitna Valleys' most valued scenic areas- Bullion Mountain. This area which is named Parcel U-23 in the Southeast Susitna Area Plan has always been correctly managed as a Recreational Area/Site pursuant to the Willow Sub-Basin Plan- Scenic Site # 90-Bullion Mountain Scenic Area and the Deception Creek Land Use Plan. We request that land classification Se (Settlement) for parcel U-23 be changed back to Ha (Habitat) and/or Public Recreation and that The Scenic Site #90 be specifically named and protected in the Southeast Susitna Plan.

It is very understandable why someone may want to build or own parcels in this beautiful area but the public's interest in preserving a key recreation area and public viewshed far outweighs this individual want. The Deception Creek Land Use Plan which was the operable plan in effect said this: "Key recreation resources identified in both the 1978-capital site development plan and the Willow Sub-Basin Plan are Bullion Mountain Scenic Area."

At the very minimum Parcel U-23 should be revised to protect the most important area. This could be done by enlarging parcel U-12 (Se). Extending U-12's boundary straight west to Parcel U-01 which preserves the core area of the Bullion Mountain Scenic Area. DNR and Borough Planners from as early as 1982 understood the value of this area. All plans have correctly identified this area as a large dispersed recreation area that abuts and supports the large and growing population centers of the Mat-Su Valley and Anchorage. On page 57 of the Deception Creek Land Use Plan this area is described as follows:

"The semi-remoteness and semi-wild, rugged character of the subunit is for these dispersed recreational activities. The subunit's importance as wildlife habitat and as dispersed recreation area will increase in the future as land use activities in adjacent areas further decrease the availability of such opportunities."

As populations grow protecting public scenic sites and recreation grows not diminishes. The sensitive nature of Deception Uplands area and value to wildlife cannot be disputed either.

The definition of "Viewshed" in the Southeast Susitna Area Plan is on point for the Bullion Mountain Scenic Area also. That definition reads:

"An area of land, water, and other environmental elements that is visible from a fixed point. In urban or regional planning viewsheds tend to be areas of particular scenic or historic value that are deemed worthy of preservation against development or other change."

Bullion Mountain meets these tests. It has historically been part of regional plans deemed worthy for protection, and is the ultimate scenic area with a view overlooking the entire Susitna Valley stunning and inspiring. Strong protection of the Nike Site Trail (ADL 46664) needs to be kept in

place to maintain the Bullion Mountain Scenic Site. This trail has long been identified in the Willow Sub-Basin Plan, the Deception Creek Land Use Plan and now the Southeast Susitna Area Plan.

It was very disappointing to the Community of Willow to have the new Southeast Susitna Plan not even mention the Bullion Mountain Scenic Site/Area. Parcel Descriptions and Management Intent paragraphs for Parcels U-13 U-22 and U-23 and others in this area (U-08, U-09, U-10 and U-12) do not even mention Bullion Mountain or the valued Scenic Site. The arbitrariness of Plan drafters stands out and is an affront to the public's best interests.

It was also discouraging and disappointing not to have this broad area that encompasses the Bullion Mountain Scenic Area correctly named in the Southeast Susitna Plan. This area has always been called and named the Deception Creek Area and was specifically called Upper Deception Creek in the Deception Creek Land Use Plan. It has never historically or geographically been called or named the Kashwitna Uplands Area. We request reconsideration of this name and ask that it be correctly identified as the Deception Creek Uplands Area for all parcels south of the Hatcher Pass Road. The Kashwitna Area and the Kashwitna Area Plan cover lands north of the Hatcher Pass Road.

We have attached operable portions of both the Willow Sub-Basin Plan and the Deception Creek Land Use Plan. We have also attached Community Comments for this area and specifically we have attached our Borough Planning Commissioner Comments for the Bullion Mountain Scenic Area. We would appreciate being heard on this matter and ask that the Scenic Site be named and protected in the Southeast Susitna Area Plan. We also request that the correct name for this area-Deception Creek Uplands be used rather than the mis-named Kashwitna Uplands.

This request for reconsideration went before the Board of the Willow Area Community Organization with input from community members in attendance at its regularly scheduled meeting on May 5th, 2008 and passed unanimously.  
Dated this 9th day of May, 2008.

Linda Oxley, Chair  
cc: Ray Burger/DNR

and Mr. Irwin's reply—

By letter dated May 9, 2008 and received in this office on May 15, 2008, you timely filed a Request for Reconsideration of my decision of April 18, 2008 to adopt the Southeast Susitna Area Plan. The timely filing of your request for reconsideration stays this decision during my reconsideration of the decision (11 AAC 02.060(a)).

Following review of the case file, applicable laws and regulations, and any other pertinent documents, I will make a decision on your requests for reconsideration.

Dated May 27. Original on WCC notice board.