



To: Governor Dunleavy and the Senate resources committee

Tordrillo Mountain Lodge and Spurr Mountain LLC support the repeal of the Susitna Basin Recreational River Management plan. Hereto referred as SBRRMP.

Our business operates on private, State of Alaska DNR lands and BLM. We conduct our business within the River corridor established in 1991 as a "recreational river" managed under SBRRMP.

We operate helicopter and land based activities in the Tordrillo Mountains and Talachulitna river basin. Our business was established in 2005 and operates under DNR authorizations for numerous activities and infrastructure established to support our activities. Tordrillo Mountain Lodge offers guests opportunities to helicopter and nordic ski in the winter, and heli ski, fish, hike, bike, climb, river raft and flight see in the summers. We operate 5 helicopters and 4 planes to access lands and private lodging facilities that supports activities for up to 40 guests and 35 employees. Our economic impact is significant considering much of the Susitna basin is inaccessible and the remote nature makes conducting business challenging. Numerous contractors for aircraft, maintenance and construction are hired annually to aid in the expansion of the business.

Conducting business within the SBRRMP has been difficult. We have been faced with numerous challenges in working to comply with a flawed and outdated management plan. A plan that is arguably invalid based on its requirement to create a 13 member board to frequently evaluate and change the plan as needed. Not once has this committee been established and met to discuss the plan in the 30 years since its inception. In fact, very few people know of its existence.

These required revisions are important to address changes that have taken place in the 30 years since the plan's adoption. Frequent revisions could resolve conflict and some of the poorly conceived and inadequate guidelines and ambiguous language.

There are requirements written into the plan for kiosks that would inform users of the plan and its objectives. None of these exist, likely, because it was never implemented and the state does not have the resources to enforce the plan. In fact, it was 10 years into our ownership before we were even aware of the plan's existence. Most people in the area have either ignored or are completely oblivious of the plan.

We support the idea of having a solid river management plan that protects the resource. However, applying the current flawed plan to operations within the management area would continue to impede growth and responsible use of DNR lands. We feel a new plan would better serve Alaskans and address the numerous overreaching regulations the current plan reflects.

Some of our major concerns are captured within the following bullet points.

- The plan adopted in 1991, has never been reviewed with public input approximately every 5 years as required by the very wording of the plan. So it fails in the mandate contained in the very words of the plan. The plan notes (1) it used a 20 year planning period to guide land management, (2) conditions may change within the 20 year period and the plan "must remain flexible enough to change with them" and (3) DNR is required to meet periodically with a broad based group that includes members of the public and stakeholders with in the management areas to determine if revisions to the plan are required. More than 30 years later, no such review with the Recreation Rivers Advisory Board has occurred and the board itself is not even seated now. Conditions have significantly changed since 1991. Without such legally required review, the plan is flawed and cannot be relied on to deny permit requests that were not considered 30 years ago.
- We find the plans restriction of the size of float docks to be in direct violation of our rights to wharf out. Asking that commercial or private property owners be restricted to no more than 100 sq feet of dock space very restrictive and overreaching. One cannot safely load and unload guests with such a small space. In fact we cannot even taxi float planes closer than 60 ft from the lake shore, due to the depth of water. These regulations placed us at odds with DNR personnel whom have decided to selectively enforce the dock restrictions when asking for permission and permits. Business is challenging enough in remote Alaska, receiving trespass notices for adequate dock space seems to not use good reason, and is in violation of current ADA policy for safe use, for those with physical disabilities.

In addition to our business issues, we also support the idea of responsible future land disposal for private ownership. This could significantly improve tourism growth in Alaska. We for one, would love to be able to build Alpine huts for public use, thus driving more tourism into the state. The idea of connecting communities and resulting economic impact are exactly what Alaska needs. Alaskan tourism, mining, and resource development businesses need encouragement and support. Regulations and policy that have never been properly implemented and reviewed, should be repealed, to clear the way for better plans and economic development.

Yours Truly,

Mike Overcast

Managing partner
Tordrillo Mountain Lodge