

**Public Comments on the Public Review Draft of the Unit 2 Amendment to the Tanana Valley State Forest Management Plan
March-April 2003**

Commenter	Comment	Response from DNR Division of Forestry
Minto	Create expanded buffer zone around Native Allotments to avoid cutting near them.	Plan amendment text: C.2. Development Activities Near Private Land. Because of the relatively large number of private land holdings in this unit, roads, timber harvest, and other development activities will be sited and designed to avoid trespass and harm to scenery near private cabins and settlement to the extent feasible and prudent. Other issues with respect to private land and Native allotments adjacent to the State Forest will be addressed through the Forest Land Use Plan process.
Minto	Don't want timber harvest.	Comment noted. However, the primary purpose of state forests as stated in AS 41.17.200(a) allows for "...the production, utilization, and replenishment of timber resources...".
Minto	Timber harvests need to avoid fish camp permit areas.	When timber sales are planned, DOF staff investigates land status records and permits to avoid conflicts with existing permits and land uses.
Minto	Wants special protection for traditional activities (fish camps, berry picking).	A Forest Land Use Plan is developed for each timber sale, which provides an opportunity to comment on specific timber sales and any potential conflicts with traditional activities. Some traditional activities associated with the Old Minto site are addressed in the plan amendment: B.1. The old village site, known as Old Minto, is the site of seasonal cultural activities for Minto residents and for people outside the village to learn about Athabascan culture. Although Minto village has been relocated to a new site approximately twenty miles north, Old Minto is still an important cultural site for the former residents, their children and grandchildren. C.1. DOF will coordinate with Old Minto lessees when planning timber harvest activities near Old Minto.
Minto	Would like wider buffers where the river erodes the banks.	The plan amendment follows the riparian buffers agreed to by the Region III Riparian Standards Science and Technical Committee: C.6. Riparian buffers will follow the interim Region III riparian standards as adopted by the Division of Forestry, or any superceding law.

		<p>The amendment also refers to additional research on erosion patterns: For additional information about historic erosion patterns along the Tanana River in this and other units, refer to Ott et al's 2001 study: Bank erosion and large woody debris recruitment along the Tanana River, Interior Alaska.</p>
Tom Hetherington, Manley	Does not want development within 20 miles of Manley Hot Springs.	Unit 2 is not located within 20 miles of Manley Hot Springs.
Tom Hetherington, Manley Hot Springs	Ice roads are the best way to access timber in this area.	<p>Specific road construction plans will be developed in the specific Forest Land Use Plans. However, the plan amendment text does address winter roads: C.11. Transportation. Because of extensive wet soils, and because all-season roads can add hunting pressure to some areas, current management favors winter access to Unit 2 for timber harvest. In some cases, however, sections of all-season roads may be feasible and appropriate outside the Minto Flats State Game Refuge.</p>
Tom Hetherington, Manley Hot Springs	Would like to harvest the trees overhanging the river. Disagrees with the Region III riparian buffer.	The plan amendment follows the riparian buffers agreed to by the Region III Riparian Standards Science and Technical Committee. However, the riparian buffers only affect commercial sales over 10,000 board feet. For personal use, the buffers do not apply.
Tom Hetherington, Manley Hot Springs	Small sales are OK.	<p>The plan amendment allows for a range of sale sizes: C.8. When designing timber sales in Unit 2, consider targeting local markets for local use and processing of timber. DOF intends to provide timber sales in a range of sizes to meet the needs of local markets and communities.</p>
Angela Wolfe, Manley Hot Springs	Doesn't want big timber sales going to export.	See response above, and quote from plan text, C.8., about targeting local markets.
Frank Gurtler, Manley Hot Springs	Supports harvest. Would like to sell some timber before it burns.	Comment noted.
Frank Gurtler, Manley Hot Springs	Good idea to open up the country to create employment. Allow some timber harvest.	Comment noted.
Frank Gurtler, Manley Hot Springs	Good to have a plan to harvest some timber.	Comment noted.

Dennis, Nenana	Fish research camp on Charlie Island, 1 mile up from the mouth of the Kantishna.	Comment noted.
Nenana	Happy about trail/road conflict language.	Comment noted.
Loggers in Nenana	Want small sales available. Happy with language in plan about “range of sizes” of timber sales.	Comment noted.
Al Ketzler Jr., Nenana	Glad that Old Minto issues are addressed in the plan.	Comment noted.
Many people in Nenana	Minimize waste in timber sales, not like previous sales near Nenana.	The specific guidelines for dealing with waste in a timber sale are addressed in the Forest Land Use Plan and contract for each timber sale. The public has an opportunity to comment on each sale.
Many people, Nenana	Make sure to have access to what’s left, and have it stacked for firewood cutters.	The specific guidelines for dealing with firewood that is left after a timber sale are addressed in the Forest Land Use Plan and contract for each timber sale. The public has an opportunity to comment on each sale.
Dennis, Nenana	Customary and traditional uses, such as fish wheels, should not need permits.	When timber sales are planned, DOF staff investigates land status records and permits to avoid conflicts with existing permits and land uses. See 11 AAC 96.020 regarding generally allowed uses and 11 AAC 96.010 regarding uses requiring a permit.

Comments received after the deadline

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Laurence Paquin, Fairbanks	Even though the riparian zone Scientific Committee's recommendation were in a legislative committee and not passed out in last year's session, consensus in Region 3 is that standards were overdue. The riparian standards should be used along all Interior waterways.	Plan amendment requires the use of these riparian buffers: C.6. Riparian buffers will follow the interim Region III riparian standards as adopted by the Division of Forestry, or any superceding law.
Laurence Paquin, Fairbanks	Recognize the research potential and subsistence value of Sawmill Island.	Plan amendment recognizes research potential: B.5. Sawmill Island, near Old Minto, offers an opportunity for research, as much of the area was harvested during the steamboat wood-cutting era, in the early 1900s. Some harvesting in the area was also done in the mid-1900s.
Laurence Paquin, Fairbanks	Habitat enhancement should be planned in cooperation with ADF&G in "intensely managed areas." That's ecology and part of the ecosystem management tool used by the USFS whereby riparian areas are primary concern areas.	Plan amendment text recommends cooperation: C.3. Post-logging site treatments (e.g., scarification or crushing) may be used to encourage regeneration of willows or hardwoods that provide food and cover for wildlife. Habitat enhancement projects are encouraged in Unit 2. The Department of Fish and Game and the Division of Forestry are encouraged to pursue funding opportunities for habitat enhancement work. In addition, planning for, and obtaining funding for, habitat enhancement work that timber operators could do while on site (e.g., shear-blading) are encouraged.
Laurence Paquin, Fairbanks	Timber sales in Unit 2 were located in the vicinity of Old Minto where a Spirit Camp for addiction rehabilitation goes on year-round. Let's show some sensitivity there, to the Land's first inhabitants.	Plan amendment text specifically mentions Old Minto to avoid conflicts: C.1. DOF will coordinate with Old Minto lessees when planning timber harvest activities near Old Minto.
Laurence Paquin, Fairbanks	When riparian buffer zones are not adequate for visual screening, FLUPs should recommend specific guidelines for post-logging site treatment plans.	Plan amendment addresses areas where buffers would not provide adequate screening: C.2. In areas where buffers will not provide adequate visual screening from the river, Forest Land Use Plans for each timber sale will recommend specific guidelines for post-logging site treatments.
Laurence	Management guidelines, and the purpose for which	Plan amendment states purpose for the RNAs:

Paquin, Fairbanks	the Research Natural Areas were established should guide DOF when DNR's existing leasing or licensing process for oil and gas leasing activities.	C.7.b. ...For the two Research Natural Areas, Subunits 2B and 2C, the Oil and Gas leasing process should consider the purposes for which the RNAs were established, as well as the management guidelines for the RNAs.
Laurence Paquin, Fairbanks	Old Forest Science and Technical Committee will be brought together shortly to evaluate biological functions of older forests and to identify management guidelines for old growth. DOF should heed their advice.	Plan amendment acknowledges commitment: C.8. An Old Forest Science and Technical Committee will be convened to evaluate biological functions of older forests and to identify management guidelines.
Laurence Paquin, Fairbanks	Timber sales in Unit 2 should target local markets. Sales should be tailored to meet their needs. A while back the state gave grants to local mills, some in that area, to add value-added equipment to their factories. Let's build on that as a subsidy as a gift to those folks unless it benefits others too.	Plan amendment does target local markets: C.8. When designing timber sales in Unit 2, consider targeting local markets for local use and processing of timber. DOF intends to provide timber sales in a range of sizes to meet the needs of local markets and communities.
Laurence Paquin, Fairbanks	Logging access roads across wildlife preserves, in review plans. As a respect for the preserve and the wildlife in it, access roads should be winter roads only. Think of the added precedence of incursions on wildlife preserves. Don't do this lightly, as wild habitat values were already deemed the top priority when this preserve/refuge was established.	The Refuge is outside of the TVSF. DNR and ADF&G manage lands within the Refuge. The Refuge plan says winter roads only will be allowed within the Refuge. The Unit 2 Plan amendment text states: C.11. The Division of Forestry must also obtain a Special Area Permit from ADF&G to construct a winter road across Refuge lands. This route may be upgraded to primary winter road standards within the Refuge...