

From: [REDACTED]
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Comment for the Haines State Forest Resource Management Area Management Plan Amendment
Date: Saturday, April 25, 2026 12:09:24 AM

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Hi,

I would like to add my comment to the Haines State Forest Resource Management Area Management Plan Amendment.

The previous timber sales plan for the Haines forest included a plan to sell timber in the Four Winds Opener. This timber sale area has access issues that would threaten a stable toad population.

I have held contact with ADF&G Habitat employees including Kate Kanouse and with Department of Natural Resources Haines Area Forester Greg Palmieri. I have also contacted Haines Borough offices and board members.

As previously proposed, access to the steep mountain was suggested by cutting an 0.2 mile easement road that was platted over 50 years ago. The easement road on paper is between a lot owned by the Haines Borough where the old Mosquito Lake School stands and Lot 3, Sub Mosquito Lake #2, Plat 80-16, Meridian Cr, Range 055E, Section 15, Township 028S. From the end of that easement, someone would have to cut a steep timber road to the timber sale area.

This proposed 0.2 mile easement would run over a spring and pond that is the breeding area of a stable natural Western Toad population. Amphibians are fish by definition under Alaska regulation 5 AAC 95.011, and fish passage must be maintained under Alaska Statute 16.05.841. The State of Alaska has already sent staff to document the area as a breeding area.

I hereby urge the State of Alaska to move the 0.2 mile easement road to the south or use another easement if this timber sale is actually created in order to protect the breeding area of the protected species. There exists another road to the area already just south of the school on Borough land. Officials from the Borough have already agreed that that road would be more appropriate in this situation and have expressed a willingness to work with the State to protect the toads.

Please add this comment and email any questions to me at [REDACTED]

Thank you,

David Voth



DIVISION OF FORESTRY & FIRE PROTECTION

HSF RMA Public Review

Name: Shawna Hotch

Date: 4-30-26

Email address: [REDACTED]

Would you like to receive email updates related to this project?

☒ YES ☐ NO

Please write your comment below:

The most helpful for planning describe specific locations, landscape features, activities, or values that you would like the management plan to address. If you would like to support or oppose specific activities, describe how those activities affect people, places, or things in the area.

The Tannana State Management plan has a lot of information that is absent in the SEAK plan.

The Haines State Management Plan needs to include:

- Sections on traditional uses, cultural resources, climate resilience, and adaptive management. (our next generations rely on these sections)
- More opportunity for voices to be heard by Haines State Forest Advisory Committee (citizen led)

Wildlife Designations surrounding Bald Eagle Preserve.

- Advocate for Cooperative Agreements for tribes after the passing of HB123 in 2022.

Audio file

Recorded April 30, 2026

Transcript

Hi this is Nick Szatkowsky I'm a 27 year resident of the Chilkat valley a subsistence user many different resources on the what's known as Haines State Forest Resource Management Area and I want to make it clear that I am absolutely fundamentally opposed to the change that's being proposed for the Haines state forest management. The existing management did need some corrections because it was inadequate in showing how there was clear forest ecology based science underpinning the management direction that existed previously. there was a utter failure to identify a matrix of old growth forest connectivity for those species that are dependent on old growth forests which there are quite a few in the Chilkat valley as you presumably know. There's no recognition of how forest soil health especially including mycorrhizal fungi that forest growth tree growth is totally dependent on. It's well established science that's been in existence for decades. And there's no indication that the Haines State Forest management is incorporating any of that understanding into the focus. The rotation schedule that's identified in the current amendment plan turning all operable forest into 120 year old second growth cycling cutover areas clearly would devastate the old growth habitat characteristics that are necessary for those species that are dependent such as flying squirrels and forest owls and other species that are dependent on functioning intact old growth forests as you well know. There are still luckily a number of areas with genuine older forest with many trees more 200 or 300 years or older and so luckily currently we are benefiting not from the actual management philosophy of the Haines State Forest but instead we're benefiting from the values of those areas that simply just haven't been subjected to state forest management activities. That's what's actually happening in current health of the ecosystem in the valley and if you proceed forward with this amendment plan it's scheduled to essentially remove nearly all of that all of that existing old growth forest network certainly on the 73,000 acres identified as operable forest and that's simply not permissible it's that's absolutely intolerable and it will severely impact the values that many of us are dependent on. But furthermore and perhaps more importantly, it is not in keeping with the constitutional mandate for managing for multiple use you clearly have had a focus already in prioritizing timber industry and industrial interests over the other interest it is not acceptable whatsoever to think that you can log in area and just say well go in and do your recreating after you logged it that's good enough or, Oh the habitat will be

fine after you log in it just isn't the same it doesn't satisfy all of the needs, You have a actual constitutional requirement, a legal mandate, to maintain all native species and their native distributional patterns that's what multiple use actually means and any timber management has to happen in a matrix that allows those other values to still continue and not be diminished and so you're failing to do that. In addition there's another legal failing of this suggested amendment that there's no indication there's a best interest finding. And without that you cannot make this you can't make this change legally and so. If you can't demonstrate that it's actually, and it's clearly not, in the best interest financially of this valley this entire community the entire valley is is very strongly dependent upon non timber non economic values that derive from a healthy functioning forest. It affects our fisheries, it affects water quality, affects wildlife, affects so many aspects of our lives here and even if you thought that was somehow the best interest finding just in terms of money was somehow supporting this idea that would be inadequate, but in fact it's not even supported by that idea you don't even can't even show that it's financially in the interest of the local community to do this the amount of logging that's being suggested in this amended plan so the entire amended plan is fundamentally flawed, the entire foundation, entire foundational philosophy is misguided and we need an entirely different focus in this valley for how the forest is managed. I'm open to the idea that the DNR 's Division of Forestry could be a participant in the management process for this valley and the forest but if you're going to demonstrate that you can't actually represent the array of interest that are critical here for this community and for the health of this forest, then you shouldn't actually be part of that process and we'll have to come up with some other method for how that's going to be managed but you won't be invited to participate if you can't show that you can represent these other interests and speak up for that rather than for the timber industry which has gotten way too much emphasis for decades. Alright thanks, and have a nice day.

From: [REDACTED]
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Logging Plan Haines State Forest
Date: Tuesday, May 19, 2026 9:27:21 AM

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To whom this may concern:

Is there a public meeting scheduled for the present logging plan of the Haines State Forest? The link to the online plan is not opening. Can you please send me any updated info? Any info would be appreciated. Thank you for your time.

Best regards,
Tara Russo

Sent from [Proton Mail](#) for iOS.

From: [REDACTED]
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: comment re: Haines State Forest Resource Management Plan
Date: Sunday, May 31, 2026 6:29:29 PM

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Dear Forester,

My name is Mark Battaion, I live in the Chilkat Valley and I depend on the Haines State Forest lands for [subsistence, sport, or commercial fishing, hiking, biking, boating, camping, or other recreation, spiritual solace, berry picking, mushroom harvesting, trapping, skiing, bird watching, wild plant medicines, clean air and water, hunting moose, mountain goats or black bear to feed my family, etc.]

Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Many of us have personal relationships with this forest. In particular, I utilize [name area here] **for** [use]. **Intensified logging in this area or anywhere else in the forest would harm my ability to use and enjoy my public land.**

My use of the forest makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. But the newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts. [List here harm to scenic beauty, wildlife habitat, subsistence resources, local economy, etc.]

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to harvest every acre of treed forest and instead [choose from the list below]:

- **Respect the input of local communities and make appropriate changes to the proposed plan**
- **Respect tribal sovereignty and traditional rights**
- **Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve**
- **Leave all remaining old growth forest intact**
- **Allow previously logged areas to recover**

- **Do not allow export sales**
- **Allow small operators to harvest house logs and firewood for local use using small, selective logging practices**
- **Conduct valid scientific studies to determine the needs of this unique, exceptionally biodiverse forest and its dependent species**
- **Work with the community to prioritize scenic recreation opportunities**
- **Do not prioritize mining projects on Haines State Forest lands**
- **Do not permit herbicide and pesticide use; instead, use non-toxic methods to control invasive species**
- **To pursue carbon offset projects, HSF must start over with a plan that does not violate the tenets of valid carbon credits and instead produces meaningful environmental benefits**
- **Abandon the Chilkat Ridge and Baby Brown old-growth sales**
- **Abandon every proposed expansion of logging into Wildlife Habit and Recreation areas**
- **Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded**

Thank you for taking my comments into consideration.

**Sincerely,
Mark Battaion**

From: [REDACTED]
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: comment re: Haines State Forest Resource Management Plan
Date: Sunday, May 31, 2026 1:05:05 PM

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To Whom It May Concern,

My name is Kristin Hathhorn. I live in the Chilkat Valley and I depend on the Haines State Forest lands for subsistence, hiking, biking, camping, spiritual solace, berry picking, mushroom harvesting, skiing, bird watching, clean air and water, etc.

Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Intensified logging in this area or anywhere else in the forest would harm my ability to use and enjoy my public land.

My use of the forest makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. But the newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts such as harm to scenic beauty, wildlife habitat, subsistence resources, and the local economy.

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to harvest every acre of treed forest and instead

- Respect the input of local communities and make appropriate changes to the proposed plan
- Respect tribal sovereignty and traditional rights
- Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve
- Leave all remaining old growth forest intact
- Allow previously logged areas to recover
- Do not allow export sales
- Allow small operators to harvest house logs and firewood for local use using small, selective logging practices
- Conduct valid scientific studies to determine the needs of this unique, exceptionally biodiverse forest and its dependent species
- Work with the community to prioritize scenic recreation opportunities

Do not prioritize mining projects on Haines State Forest lands

- Do not permit herbicide and pesticide use; instead, use non-toxic methods to control invasive species
- To pursue carbon offset projects, HSF must start over with a plan that does not violate the tenets of valid carbon credits and instead produces meaningful environmental benefits
- Abandon the Chilkat Ridge and Baby Brown old-growth sales
- Abandon every proposed expansion of logging into Wildlife Habit and Recreation areas
- Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded

Thank you for taking my comments into consideration.

Sincerely,
Kristin Hathhorn



From: [REDACTED]
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines State Forest Amendment
Date: Wednesday, May 27, 2026 9:32:45 AM

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I am writing in support of this amendment. Haines needs to try and diversify what economic strategies come our way. We have a forest that needs to be taken care of and the first step is to manage with the health of our trees at the top of the priority.

I support this amendment and I will not “parrot” information that you already know. I believe this could really help the forest as well as putting people to work.

Thank you
Diana Lapham

[REDACTED]

Sent from my iPad

From: [REDACTED]
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Logging plan for Haines State Forest
Date: Sunday, May 31, 2026 6:56:43 AM

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Dear Foresters, I live in Haines on the Chilkoot corridor. I depend on an intact forest for recreation, scenic values, healthy fisheries, and certainly to prevent landslides which commonly occur on steep hillsides. We have already had numerous landslides due to tree cutting on vulnerable slopes.

I also depend, as does everyone in Haines, on a healthy tourism economy, and this would be very seriously impacted by clearcutting.

Also I object strongly to using State funds to subsidize logging which is clearly not in my interest or that of almost anyone else in Haines.

Our forests are simply far more valuable intact than cut down.
Thank you for your attention. Sally McGuire

From: [REDACTED]
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: comment re: Haines State Forest Resource Management Plan
Date: Sunday, May 31, 2026 7:13:49 AM

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It doesn't make sense for the state to open up the Haines State Forest lands to intensive logging. Not only does the state have a history of losing money on timber sales, but intensive logging destroys so much of what makes our area a beautiful and life-sustaining ecosystem. Instead of trying to preserve all of the benefits of a forest system, the state's Haines State Forest Resource Management Plan seems bent on destroying it.

Residents and visitors depend on the forests for foraging, recreation and hunting. And, of course, the animals who live in it depend on it for their lives. In the past few years, avalanches have taken local lives and destroyed homes. Intense logging would make even more avalanches inevitable.

Please do the sensible and the right thing: Make changes to the proposed plan that encourage and allow multiple uses of the state forests for all of the years to come.

Sincerely,

Sharon Resnick

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Sent from Yahoo Mail for iPad](#)

From: [Heidi Robichaud](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines State Forest Plan
Date: Sunday, May 31, 2026 4:22:03 PM

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Dear Forester,

My name is Heidi Robichaud. I live in the Chilkat Valley for 20 years and I depend on and utilize the Haines State Forest lands for a wide range of recreation activities, work and subsistence uses. My family has made its living directly from local timber products, building timber frame buildings and making wooden puzzles from local woods.

I am deeply concerned about the proposed Forest Management Plan. Not only does it conflict blatantly with the current plans objectives in many areas, but Intensified logging in this area or anywhere else in the forest would harm my ability and my grandchildrens to use and enjoy this public land.

My use of the forest makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts to scenic beauty, wildlife habitat, subsistence resources, and the local wood products and greater economy.

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to open up every acre of treed forest to logging. Please respect the input of local communities, small operators, tribal sovereignty and make appropriate changes to the proposed plan.

A few years ago, our local museum in Haines worked with local operators, foresters, artists and others to create an exhibit on Local Wood Products. It was very well received by the community including a broad range of users. The exhibit emphasized the principles of Responsible Forest Management, including supporting micro sales for local businesses, protecting wildlife habitat, supporting hunting, fishing, tourism, subsistence and recreation. Recognizing the well established value of old growth forests in buffering against climate change and discouraging export of raw logs. Local priority returns more value per board foot and helps engage residents in understanding the sustainable values of the land they live in.

In addition , To pursue carbon offset projects, HSF must start over with a plan that does not violate the tenets of valid carbon credits and instead produces meaningful environmental benefits.

Abandon the Chilkat Ridge and Baby Brown old-growth sales and every proposed expansion of logging into Wildlife Habit and Recreation areas.

Work with the communities and small timber operators of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded.

This Chilkat Valley has been recognized as a globally significant area of biodiversity and this value needs to be protected and the trees are the foundation of this.

Thank you for taking my comments into consideration.

Sincerely,

Heidi Robichaud
Haines AK

From: [Dena Selby](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines State Forest Management Plan
Date: Sunday, May 31, 2026 9:14:26 AM

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Dear Forester,

My name is Dena Selby. I live in the Chilkat Valley and I depend on the Haines State Forest lands for spiritual solace, berry picking, bird watching, clean air and water.

Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Many of us have personal relationships with this forest.

My use of the forest makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. But the newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts. Harm to scenic beauty, wildlife habitat, subsistence resources that cannot be recovered once gone.

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to harvest every acre of forest and instead:

- **Respect the input of local communities and make appropriate changes to the proposed plan**
- **Respect tribal sovereignty and traditional rights**
- **Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve**
- **Leave all remaining old growth forest intact**
- **Allow previously logged areas to recover**
- **Do not allow export sales**
- **Allow small operators to harvest house logs and firewood for local use using small, selective logging practices**
- **Conduct valid scientific studies to determine the needs of this unique, exceptionally biodiverse forest and its dependent species**
- **Work with the community to prioritize scenic recreation opportunities**
- **Do not prioritize mining projects on Haines State Forest lands**
- **Do not permit herbicide and pesticide use; instead, use non-toxic**

methods to control invasive species

- To pursue carbon offset projects, HSF must start over with a plan that does not violate the tenets of valid carbon credits and instead produces meaningful environmental benefits
- Abandon the Chilkat Ridge and Baby Brown old-growth sales
- Abandon every proposed expansion of logging into Wildlife Habit and Recreation areas
- Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded

Thank you for taking my comments into consideration.

Sincerely,

Dena Selby, M.D.

From: [laurie dadourian](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Attn: Forest Planner
Date: Monday, June 1, 2026 4:53:59 PM

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Dear Forester

I live in the Chilkat Valley and use the Haines State Forest land for hiking, biking, skiing, berry picking, mushrooming, and most of all for the natural beauty and wildlife. Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Intensified logging in the forest would harm the ecosystem.

My use of the forest makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK land for the benefit of its people. The newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts. As a directly impacted stakeholder, I respectfully request the HSF abandon its plan to harvest every acre of treed forest and instead leave all remaining old growth first in tact, allow previously logged areas to recover, allow small operators to harvest house logs and firewood for local use using small and selective logging practices, do not prioritize mining projects, do not permit herbicide and pesticide use, and work with the communities of Haines, Klukwan, and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Ease Preserve were founded.

I appreciate your taking public comments.

Thank you,
Laurie Dadourian

From: [Kathleen Menke](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Comments State Forest Plan/Haines
Date: Tuesday, June 2, 2026 6:04:39 PM

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Alaska Division of Forestry & Fire Protection
ATTN: Forest Planner
500 W 7th Ave. Ste 1450
Anchorage, AK 99501

To Whom It May Concern:

Haines State Forest lands are important for maintain biodiversity and healthy Chilkat and Chilkoot watershed for subsistence, sport, and commercial fishing, outdoor recreation, spiritual solace, berry picking, mushroom harvesting, trapping, bird watching, wild plant medicines, clean air and water, and traditional hunting lifestyles.

Intact forests help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and store and release water during the time of year needed by salmon and other wildlife. Logging these forests will warm the watersheds and contribute to future wildfire danger.

The newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous negative impacts.

As a directly impacted stakeholder, the Haines State Forest must abandon its plan to harvest every acre of treed forest and instead:

- *Respect the input of local communities*
- *Respect tribal sovereignty and traditional rights*
- *Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve*
- *Leave all remaining old growth forest intact*
- *Do not allow export sales*
- *Allow small operators to harvest house logs and firewood for local use using small, selective logging practices*

- *Conduct valid scientific studies to determine the needs of this unique, exceptionally biodiverse forest and its dependent species*
- *Bogus carbon credit programs should not be used to justify expansion of logging in the HSF*
- *Abandon the Chilkat Ridge and Baby Brown old-growth sales*
- *Abandon every proposed expansion of logging into Wildlife Habit and Recreation areas*
- *Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded*
- *Provide meaningful consultation with the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagle Preserve Advisory Council as required by State Law.*

Sincerely,

Kathleen Menke

30-year resident, photographer, ecologist, subsistence user of HSF

[REDACTED]

[REDACTED]

[REDACTED]

From: [Alexandria Weddell](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines State Forest Management Plan
Date: Tuesday, June 2, 2026 6:16:53 PM

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Dear Forester,

My name is Alexandria Weddell. I live in Skagway, Alaska.

Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Intensified logging in this area or anywhere else in the forest would harm my ability to use and enjoy my public land.

My use of the forest for recreation, clean, air, and tourism business makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. But the newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous negative impacts.

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to harvest every acre of treed forest and instead respect the input of local communities and make appropriate changes to the proposed plan. Perhaps you can work with the communities of Haines, Klukwan, and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded.

Thank you for taking my comments into consideration.

Sincerely,

Alexandria Weddell

From: [Fulton, Trevor M \(DNR\)](#)
To: [Preston, Geneva S \(DNR\)](#); [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Cc: [Adoko, Ashlee K \(DNR\)](#); [Bruno, Jeff J \(DNR\)](#); [Wagenfehr, Kayla M \(DNR\)](#)
Subject: Re: HSF RMA MP Public Review Draft available for comment
Date: Wednesday, June 3, 2026 1:07:31 PM
Attachments: [image001.png](#)
[OPMP Comments on Draft HSEFMA Management Plan.pdf](#)

Please find the attached comments on the Draft Haines State Forest Resource Management Area Management Plan from the Carbon Offset Program within the DNR Office of Project Management & Permitting.

Regards,



Trevor Fulton
Carbon Offset Program Manager
Alaska Department of Natural Resources
Phone (907) 269-8755
550 W 7th Ave, Suite 1430, Anchorage, AK

From: Preston, Geneva S (DNR) <geneva.preston@alaska.gov>
Date: Thursday, April 9, 2026 at 3:05 PM
To: DNR DOF Haines Mgmt (DNR sponsored) <dnr.dof.haines@alaska.gov>
Cc: Palmieri, Greg J (DNR) <greg.palmieri@alaska.gov>; Dobell, Trevor (DNR) <trevor.dobell@alaska.gov>; List, Ashley R (DNR) <ashley.list@alaska.gov>; Douse, Jeremy A (DNR) <jeremy.douse@alaska.gov>
Subject: HSF RMA MP Public Review Draft available for comment

Hello,

Please see the attached public notice regarding the Public Review Period for the Draft Haines State Forest Resource Management Area Management Plan.

See the project webpage, including the draft management plan at <https://forestry.alaska.gov/HSFamendment/>

See Alaska's Online Public Notice System at <https://forestry.alaska.gov/HSFamendment/>

Thank you,
Geneva Preston

Geneva Preston
Forest Planner

State of Alaska
Department of Natural Resources
Division of Forestry & Fire Protection

907.451.1645
geneva.preston@alaska.gov

DNR Office of Project Management & Permitting Comments on the Draft Haines State Forest Resource Management Area Management Plan (April 2026)

Submitted June 2, 2026 | Trevor Fulton, Carbon Offset Program Manager

Page Number	Line Number	Comment	Recommended Change
1-19	2-7	Revise for clarity.	Revise the first paragraph to read: "This Forest Plan amendment addresses the inclusion of commercial forest resources across the Forest in the timber harvest program, aligning Forest resource use with establishing statutes. This amendment also adds policy language recognizing the State's authority to develop carbon offset projects in the Forest. In 2023, the Alaska State Legislature created a carbon offset program within DNR and authorized the Department to undertake carbon offset projects on State lands, including State Forests (AS 38.95.400-499)."
1-19	11-12	Inadequate summary of Chapter 2 revisions relating to carbon offset projects.	Revise lines 11-12 to read: "Chapter 2 establishes policy relating to DNR's authority to undertake carbon offset projects in the Forest, identifies land appropriate for such projects, and provides management goals and guidelines relating to the use of timber resources for carbon offset projects." If DFFP opts to retain existing draft language, at least modify to read: "Chapter 2 contains policies relating to the Carbon Offset Program and carbon offset projects undertaken by the State under AS 38.95.400-499 and 11 AAC 78."
2-6	12	Carbon offset projects do not involve the "sale" of public resources.	Change "sale" to "utilization", a broader term which would include the disposal of timber through timber sales as well as the use of forest resources for carbon offset projects.
2-6	17	Clarify that only DNR may undertake carbon offset projects in the Forest.	Revise to read: "Provide opportunities for DNR to undertake carbon offset projects in the Forest."
2-6	17	This does not provide a "specific goal of the Haines State Forest"(per line 8 of this section); it merely restates the general goal to "provide opportunities for the development of carbon offset projects" (per lines 5-7 of this section). Consider adding more specific goals, similar to those for carbon offset projects outlined in Chapter 2-F of the 2025 Tanana Valley State Forest Management Plan (pp. 31-32).	Revise to include specific management goals relating to carbon offset projects, including: (1) Create economic benefits by (a) generating revenue for the State’s general fund, (b) supporting community and utility grants for renewable energy development through required contributions to the Renewable Energy Grant Fund from the sale of carbon offset, and (c) promoting local employment and the use of local support services; (2) Produce co-benefits for nearby communities by (a) enhancing ecosystem functions such as water quality and wildlife habitat and (b) improving opportunities for fishing, hunting, subsistence activities, recreation, and scenic enjoyment; and (3) Maintain access and opportunity for a range of forest uses within areas enrolled in carbon offset projects.
2-7	5	AS 41.15.315(e) requires that the HSFRMA plan be amended to allow carbon offset projects (not a carbon offset program), but remains silent regarding carbon leasing.	Change "Carbon Offset Program" to Carbon Offset Projects", which could include DNR-undertaken projects under the carbon offset program and third-party-undertaken projects on leased land under AS 38.05.081 (carbon management leasing).

2-7	5-17	AS 41.15.315(e) requires that the HSRMA plan be amended to allow carbon offset projects, but remains silent regarding carbon leasing. Revise for clarity, accuracy, and to align with statutes and regulations relating to the carbon offset program and carbon offset projects in the HSRMA.	Revise paragraph to read: "Carbon offset projects undertaken in the Haines State Forest must comply with AS 38.95.400–499 and the implementing regulations in 11 AAC 78. These statutes and regulations govern program eligibility, carbon project approval, monitoring, verification, registration, revenue allocation, and project term requirements. All carbon offset activities in the Forest must be consistent with the Haines State Forest Management Plan pursuant to AS 41.15.315(e), and this Plan identifies all land use designations as appropriate for consideration of carbon offset projects." Consider adding: "Carbon offset projects must follow the procedures of 11 AAC 78, including project proposal submission, baseline establishment, quantification protocols, verification, registration, and monitoring requirements. The DNR Office of Project Management and Permitting is the delegated authority to make a written finding that a carbon offset project will best serve the interests of the State under 11 AAC 78.050, AS 38.95.410(d), and AS 38.05.035(e), in coordination with DFFP to ensure consistency with this Plan.
2-7	24	Revise for accuracy and alignment with language in other sections allowing carbon offset projects in the HSRMS.	Replace "including" with "and be available for".
2-9	14	This section could benefit from additional guidance/clarity on how carbon projects interact with sustained yield determinations.	Consider adding a new paragraph entitled "Sustained Yield: Carbon Offset Projects" to read: "Carbon offset projects must not impair the Forest’s ability to meet sustained yield requirements under AS 41.17.060. Carbon projects may defer harvest but cannot remove so much productive acreage, or alter harvest schedules to such a degree, that the Forest can no longer support long-term, continuous timber production. All carbon project acres must be incorporated into sustained yield and AAC modeling to ensure compliance."
2-10	1	Revise for consistency.	Replace "sequestration" with "offset".
2-15	28-29	Revise for clarity.	Revise to read: "Timber management activities and carbon offset projects must be supported by a Best Interest Finding. Additionally, any proposed timber sale exceeding 10 acres requires preparation of a Forest Land Use Plan in accordance with AS 38.05.112."
2-15	Footnote	Revise for clarity. Current language implies that "carbon sales" are timber resource sales. They are not. Carbon offset projects are management decisions, not disposals like timber sales. Further, sales of carbon offsets (which are generated from a carbon offset project) do not require a BIF; however, undertaking a carbon offset project on state land <i>does</i> require a BIF.	Revise footnote 7 to read: "The decision to conduct a timber sale or undertake a carbon offset project requires a written finding that the sale or project will best serve the interests of the State under AS 38.05.035(e)."
2-16	21	This section could be interpreted to apply to both reforestation-based carbon offset projects and post-timber-harvest reforestation.	Consider revising the heading to "Post-Timber-Harvest Reforestation".

2-16	30-33	These do not appear to be management guidelines. Recommend deleting this material and mirroring the Management Guidelines from the Carbon Offset Project section in Chapter 2-F of the 2025 Tanana State Forest Management Plan (p. 32).	<p>Recommend replacing current language with management guidelines similar to the Carbon Offset Project section in Chapter 2-F of the 2025 Tanana State Forest Management Plan (p. 32):</p> <p>"The DNR Office of Project Management and Permitting (OPMP) Carbon Offset Program is responsible for planning, developing, and implementing carbon offset projects on State land, including within the Haines State Forest. Carbon offset projects in the Haines State Forest are subject to the requirements of AS 38.95.400 – AS 38.95.499 (Carbon Offset Program) and 11 AAC 78 (Carbon Offset Projects on State Land), including:</p> <p>Identification of potential carbon offset projects: Potential carbon offset projects within the TVSF will be identified by DNR. DNR may consider recommendations from other State agencies, local governments, non-profits, tribal entities, private companies, or other members of the public.</p> <p>Evaluation of potential carbon offset projects: DNR will determine whether to proceed with a potential carbon offset project by considering the economic effects, revenue potential, compatibility with other land uses, and other factors.</p> <p>Best Interest Findings for carbon offset projects: DNR must make a written finding that a carbon offset project serves the State’s best interests before developing a project. The best interest finding is based on information, material facts, and issues identified in the evaluation process and during public review and comment.</p> <p>Registration and management of carbon offset projects: DNR will manage a carbon offset project in the Haines State Forest in a manner consistent with a carbon registry’s standards, protocols, and methodologies. AS 38.95.499(10) defines “registry” to mean an organization or program that registers and issues carbon offset credits for carbon offset projects. A carbon registry is an independent carbon crediting program that enforces standards to ensure that carbon benefits (i.e. greenhouse gas emission reduction or removals from the atmosphere) from a carbon offset project are real, measurable, permanent, and verifiable.</p> <p>Requirements for Carbon Offset Projects: AS 38.95.410 limits the term of a carbon offset project to 55 years; requires that State land used for a carbon offset project, to the extent practicable, remain open to (1) the public for access, hunting, fishing, and other generally allowed uses and (2) other resource development; and requires that State land used for a carbon offset project remain open to mineral exploration and development.</p>
2-18	3	Revise for consistency.	Change "Carbon projects" to "Carbon offset projects".
2-18	31	The inclusion of "carbon credits" as a timber product here is inaccurate.	Delete "and including timber resource use as carbon credits."
2-18	33	Revise for consistency.	Change "Carbon Credits" to "Carbon offsets".

2-18 2-19	33-36 1-7	Revise for clarity and accuracy.	<p>Revise section to read:</p> <p>"Carbon offsets generated through a forest carbon project represent verified removals of atmospheric carbon dioxide or the avoidance of emissions that would otherwise occur. In forest-based projects, these offsets are created when the Forest maintains or increases carbon storage above a defined baseline condition. One metric ton of carbon dioxide equivalent (CO₂e) stored or avoided equals one carbon offset credit.</p> <p>Carbon accounting for forest offset projects relies on detailed forest inventory and growth modeling. Existing carbon stocks are quantified through measurements such as tree species, diameter, height, and basal area, which collectively indicate the amount of carbon currently stored. Projected growth rates and stand dynamics are used to estimate future carbon sequestration, reflecting the Forest’s capacity to store additional carbon over time.</p> <p>Forest carbon projects therefore require comprehensive measurement, analysis, and modeling to accurately determine carbon per acre and the volume of offset credits that can be generated under an approved carbon accounting methodology. The DNR Office of Project Management and Permitting (OPMP) will lead carbon program development within the Forest, with support from the Division of Forestry and Fire Protection, ensuring alignment with Haines State Forest management objectives."</p>
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From: [Betsy Van Burgh](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines State Forrest Management Plan
Date: Wednesday, June 3, 2026 7:34:57 PM

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Dear Forrester,

I have lived in the Chilkat Valley for 40 years and I depend on the Haines State Forest lands to help provide my family a healthy lifestyle. Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Many of us have personal relationships with this forest. In particular, I utilize the upper Chilkat Valley for moose hunting, subsistence fishing, gathering foods, and recreational purposes. Intensified logging in this area or anywhere else in the forest would harm my ability to use and enjoy my public land.

My use of the forest makes me a stakeholder with rights; and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. But the newly proposed plan does not benefit the people of Alaska.

Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts, the major ones being the destruction of wildlife habitat and subsistence use areas, and more specifically the destruction of salmon spawning habitat. The consequences would be less fish for fishermen and subsistence users and therefore hurt our local economy and our way of life here.

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to harvest every acre of treed forests and instead :

- Respect the input of local communities and make appropriate changes to the proposed plan
- Respect tribal sovereignty and traditional rights
- Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve
- Leave all remaining old growth forest intact
- Allow previously logged areas to recover

- Do not allow export sales but instead allow small operators to harvest house logs and firewood for local use using small, selective logging practice
- Do not prioritize mining projects on Haines State Forest lands
- Prioritize the importance of having a valley with an abundance of biodiversity that would help support ecotourism and local usage
- Abandon the Chilkat Ridge and Baby Brown old-growth sales
- Abandon every proposed expansion of logging into Wildlife Habit and Recreation areas
- Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded

Thank you for taking my comments into consideration

Sincerely,

Elizabeth Vanburgh

From: [Aimee Creelman](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines State Forest Management Plan
Date: Thursday, June 4, 2026 2:56:08 PM

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To All it May Concern, June 4, 2026

My name is Aimee Creelman and I am a concerned citizen who lives in the Chilkat Valley. I depend on the Haines State Forest lands for recreating and subsistence.

Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Many of us have personal relationships with this forest. In particular, I utilize the forests surrounding the Chilkat River for activities mentioned above. Intensified logging in this area or anywhere else in the forest would harm my ability and ability of so many others to use and enjoy my public land.

My use of the forest makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. But the newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts. For example, harming the scenic beauty that draws so many to this region, as well as wildlife habitat, the subsistence lifestyle we depend on, etc.

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to extensively harvest so much of our precious forest and instead:

- Respect the input of local communities and make appropriate changes to the proposed plan
- Respect tribal sovereignty and traditional rights
- Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve
- Leave all remaining old growth forest intact
- Allow previously logged areas to recover
- Do not allow export sales
- Allow small operators to harvest house logs and firewood for local use using small, selective logging practices

Conduct valid scientific studies to determine the needs of this unique, exceptionally biodiverse forest and its dependent species

- Work with the community to prioritize scenic recreation opportunities
- Do not prioritize mining projects on Haines State Forest lands
- Do not permit herbicide and pesticide use; instead, use non-toxic methods to control invasive species
- To pursue carbon offset projects, HSF must start over with a plan that does not violate the tenets of valid carbon credits and instead produces meaningful environmental benefits
- Abandon the Chilkat Ridge and Baby Brown old-growth sales
- Abandon every proposed expansion of logging into Wildlife Habit and Recreation areas
- Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded

Thank you for taking my comments into consideration.

Sincerely,

Aimee Creelman



From: [sam edwards](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: comment re: Haines State Forest Resource Management Plan
Date: Thursday, June 4, 2026 7:04:42 PM

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To Whom it May Concern,

As a resident of the Chilkat Valley I want to respectfully register my opposition to the proposed changes to the HSF management plan. These changes seem to completely neglect all other uses of the state forest including tourism (a major industry here), recreation and subsistence in favor of subsidizing large scale clear cuts. Logging is an important part of our economy as well but opening up the entire state forest to it is shortsighted and detrimental to the long term health of our community.

Sincerely,
Sam Edwards

From: [Thomas Ely](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Comment re: Haines State Forest Resource Management Plan
Date: Thursday, June 4, 2026 2:00:48 PM
Attachments: [AK Dept of Forestry - HSFMP Draft 2026.pdf](#)

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Please see attached public comment for the HSFMP revision.

Thom Ely

[REDACTED]

[REDACTED]

AK DNR Dept of Forestry

June 4, 2026

DNR DOF,

I strongly object to the proposed draft of the revised Haines State Forest Management Plan (HSFMP). It is a step backward from the 2002 HSFMP. Under the guise of a new carbon offset program the forest is being made available to virtually unrestricted timber harvest. I request that the areas set aside in the 2002 HSFMP for wildlife and recreation be included and set aside in this draft plan. In addition, areas 1A, 2A,B, 4B,C,D, 5, 6A,B, 7A,B, 8A,B,C,D, 9A,B,C be added to wildlife and recreation and removed from the timber base.

The proposed new plan more than doubles the number of forested acres for timber harvest from 5.88 MBF to 14.77 MBF. The DOF is required to base its proposed timber harvest on an operational level inventory of forest resources. But DOF used imperfect computer software models to predict a greater merchantable forest volume in 120 years than the original forest that it's proposing to be cut down. This makes no sense. Chilkat Valley forests are not highly productive temperate rainforests, they are slow-growing sub-boreal snow forests adapted to this transitional climate. Yet, DOF uses tree regrowth calculations that project regrowth rates as if this were a temperate rainforest like the Southern Tongass National Forest, ignoring the challenges faced by young trees in the Chilkat Valley. This is significant because DOF bases its Annual Allowable Cut and 120-year Rotation Period on regrowth calculations. Anyone who frequents the forest has seen old clearcuts that are still choked with alder and Devil's Club. These old clearcuts are not likely to become high-volume merchantable timber in the next 40 - 60 years. The draft plan also includes Cottonwood in the Annual Allowable Cut calculation. Cottonwood was not included in the 2002 Plan due to low market demand and HSF has not demonstrated a new market for cottonwood. This too, inflates the appearance of a timber base.

In this HSFMP revision DOF also ignores the relationship between the HSF and the Chilkat Bald Eagle Preserve.

In the previous plan, DNR had identified appropriate uses for specific subunits in the HSF with reference to their proximity to the Preserve. In the 2002 management plan, for example, the DNR explained that the management of Subunit 8b (Chilkoot Lake), was to be "similar" to management of "adjoining lands within the [Preserve]" and would "focus on the maintenance" of "these resources". The 2026 draft largely omits discussion of the Preserve. This change in management approach signals a failure by DNR to acknowledge the interconnection between the two management areas, endangering the values for which both were established.

As a division of the Department of Natural Resource (DNR), the DOF is subject to a procedural obligation to "consult with the Division of Parks, the Department of Fish and Game, including each local fish and game advisory committee with jurisdiction in the area, and the Alaska Chilkat Bald Eagle Preserve Advisory Council to promote effective, efficient, and coordinated administration" of the HSF and the Preserve, in keeping with the "the values for which each is established." The revision process for the HSFMP has been flawed from the beginning. It has not been a robust public process, but a behind the scenes reworking of a management plan to benefit timber harvest at all costs. I request that you take these points and incorporate them into the final HSFMP.

Sincerely,

Thomas Ely [REDACTED]

From: [Deborah Gravel](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines State Forest Management Plan
Date: Thursday, June 4, 2026 9:07:03 PM

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Dear Forester,

My name is Deborah Gravel. I live in the Chilkat Valley and I depend on the Haines State Forest lands for subsistence fishing, hiking, biking, boating, camping, spiritual solace, berry picking, mushroom harvesting, skiing, bird watching, wild plant medicines, clean air and water,

Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Many of us have personal relationships with this forest. In particular, I utilize the Eagle Preserve for hiking, bird watching, and paddling. Intensified logging in this area or anywhere else in the forest would harm my ability to use and enjoy my public land.

My use of the forest makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. But the newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts. Forest loss will have a profound impact on the watersheds that provide for healthy salmon populations and the people and wildlife that depend on intact forests for food and shelter. We are blessed to live in a place of stunning natural beauty. Logging would be a travesty to our viewshed.

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to harvest every acre of forest with trees and instead :

- Respect the input of local communities and make appropriate changes to the proposed plan
- Respect tribal sovereignty and traditional rights
- Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve
- Leave all remaining old growth forest intact
- Allow previously logged areas to recover

- Do not allow export sales
- Allow small operators to harvest house logs and firewood for local use using small, selective logging practices
- Conduct valid scientific studies to determine the needs of this unique, exceptionally biodiverse forest and its dependent species
- Work with the community to prioritize scenic recreation opportunities
- Do not prioritize mining projects on Haines State Forest lands
- Do not permit herbicide and pesticide use; instead, use non-toxic methods to control invasive species
- To pursue carbon offset projects, HSF must start over with a plan that does not violate the tenets of valid carbon credits and instead produces meaningful environmental benefits
- Abandon the Chilkat Ridge and Baby Brown old-growth sales
- Abandon every proposed expansion of logging into Wildlife Habit and Recreation areas
- Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded

Thank you for taking my comments into consideration.

Sincerely,

Deborah Gravel



From: [eric holle](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: comment re: Haines State Forest Resource Management Plan
Date: Thursday, June 4, 2026 2:01:24 PM

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Dear Foresters,

I'll try to be brief and not just say the same things I've been saying for 37 years living in the Chilkat Valley. But the attitude of the current administration seems to be to continue to refer to old growth forests as "overmature and decadent" and to convert a dynamic diverse forest system into tree farms of spruce.

The Annual Allowable Cut was already too high and is based on false assumptions about the inventory, the rate of tree growth, the general climactic conditions in the Haines State Forest. There are numerous microclimates in the watershed and many of them are snow-dominated, north facing and cold. The trees do not grow as quickly as they do in state forests in southern SE Alaska. Thus the AAC needs to be reduced and the rotation period at least doubled from 120 to 240 years, allowing for the forest to regain at least some characteristics of old growth forests. A better course but be to focus on utilization of second growth.

There is no way the state can sell timber from the Chilkat Valley via clearcutting and export, and still make back the money spent on all the administrative costs. True accounting of timber sales needs to include environmental consequences to the watershed, many of which are hydrological and difficult to see by the untrained eye. I spent 10 years streamwalking fish surveys for the Alaska Department of Fish and Game and saw the impacts of excessive cutting in the Kelsall very clearly, which included the drying and disappearance of underwater springs near salmon redds that are necessary for successful spawning. Structural changes seen over that time period - channelization and simplification of the river, loss of large woody debris - also became clear over time. Based on best available info at this time, water temperatures have also been increased. This all undoubtedly factored into the decline of the local king salmon population, although there are other factors as well. Global climate change further underscores the need to maintain intact forests to protect watersheds from extreme precipitation events.

The idea of reclassifying the entire forest and putting it into the timber base violates the years of effort that the community and state, including Republican governor Jay Hammond, put into creating the existing management classifications within the forest. To do this in an attempt to gain carbon offsets is insulting to anyone who understands the process. Carbon offsets can be a much better alternative than clearcutting the remaining forest, but only if old growth forest is removed from the timber base and given permanent protected status, not by making the entire forest available to be logged.

A better approach might be for the state to get out of the timber business altogether except for small local sales, and pursue credits for biodiversity which is now occurring in some areas. The state could be a leader in this new approach for offsets by developing a conservation strategy for the HSF similar to that used by the Tongass National Forest a few miles to our

south.

Thank you accepting these comments.

Eric Holle



From: [Julie Korsmeyer](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines State Forest Management Plan. Letter
Date: Thursday, June 4, 2026 5:20:34 PM
Attachments: [Dear Forester.docx](#)

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June 4, 2026

Dear Forester,

My name is Julie Korsmeyer. I live in the Chilkat Valley and I depend on the Haines State Forest lands for hiking, biking, boating, camping. (spiritual solace), berry picking, skiing, bird watching and most importantly, clean air and water.

Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Many of us have personal relationships with this forest. In particular, I live I the Four Winds Mountain area. Intensified logging in this area or anywhere else in the forest would harm my ability to use and enjoy my public land and feel secure that my home will not be destroyed by a landslide.

My use of the forest makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. But the newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts. State managers should take into consideration climate change which may result in increased rains setting off slides on slopes where the trees have been cut.

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to harvest every acre of treed forest and instead:

- Respect the input of local communities and make appropriate changes to the proposed plan
- Respect tribal sovereignty and traditional rights
- Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve
- Leave all remaining old growth forest intact
- Allow previously logged areas to recover
- Do not allow export sales
- Allow small operators to harvest house logs and firewood for local use using small, selective logging practices
- Conduct valid scientific studies to determine the needs of this unique, exceptionally biodiverse forest and its dependent species
- Work with the community to prioritize scenic recreation opportunities
- Do not prioritize mining projects on Haines State Forest lands

- Do not permit herbicide and pesticide use; instead, use non-toxic methods to control invasive species
- To pursue carbon offset projects, HSF must start over with a plan that does not violate the tenets of valid carbon credits and instead produces meaningful environmental benefits
- Abandon the Chilkat Ridge and Baby Brown old-growth sales
- Abandon every proposed expansion of logging into Wildlife Habit and Recreation areas
- Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded

Thank you for taking my comments into consideration.

Sincerely,

Julie Korsmeyer

From: [Jim Morris](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: comment on Haines State Forest Management Plan
Date: Thursday, June 4, 2026 1:49:21 PM

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I oppose the new Haines State Forest Management Plan. It manipulates assumptions to maximize the cut. It pretends that there is way more timber available than there actually is. It doubles the available acreage and it doubles the available annual cut. It allows cutting on all areas adding wildlife and recreation areas. It drops its earlier protection of Chilkoot lake near the Chilkat Eagle Reserve. It ignores the requirements of "sustained use" in the AK constitution and of "multiple use" by the DNR. It uses bogus carbon credits. It loses money for the USFS and for the state.

--

Cheers,
Jim Morris

[REDACTED]

From: [lakechilkat](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Comment - Haines State Forest Management Plan
Date: Thursday, June 4, 2026 12:19:45 PM

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Dear Forester,

Perhaps you should be ashamed of yourself. Perhaps you no longer have the same values when you joined the forestry service. No need to play games about the radical impact this will have on our local ecosystem and our ability to live from and enjoy it. Think seriously if you are actually representing the people's best interest, we will hold you legally accountable and you should be morally accountable to yourself if you have any sense of Mother Nature.

My name is John Rilling. I live at Lake Chilkat and I depend on the Haines State Forest lands for [subsistence, sport, or commercial fishing, hiking, biking, boating, camping, or other recreation, spiritual solace, berry picking, mushroom harvesting, trapping, skiing, bird watching, wild plant medicines, clean air and water, hunting moose, mountain goats or black bear to feed my family, etc.]

Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Many of us have personal relationships with this forest. In particular, I utilize the Chilkat lake and river for fishing and recreation. Intensified logging in this area or anywhere else in the forest would harm my ability to use and enjoy my public land.

My use of the forest makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. But the newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts. [List here harm to scenic beauty, wildlife habitat, subsistence resources, local economy, etc.]

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to harvest every acre of treed forest and instead [choose from the list below]:

- Respect the input of local communities and make appropriate changes to the proposed plan
- Respect tribal sovereignty and traditional rights
- Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve
- Leave all remaining old growth forest intact
- Allow previously logged areas to recover
- Do not allow export sales
- Allow small operators to harvest house logs and firewood for local use using small, selective logging practices
- Conduct valid scientific studies to determine the needs of this unique, exceptionally biodiverse forest and its dependent species

- Work with the community to prioritize scenic recreation opportunities
- Do not prioritize mining projects on Haines State Forest lands
- Do not permit herbicide and pesticide use; instead, use non-toxic methods to control invasive species
- To pursue carbon offset projects, HSF must start over with a plan that does not violate the tenets of valid carbon credits and instead produces meaningful environmental benefits
- Abandon the Chilkat Ridge and Baby Brown old-growth sales
- Abandon every proposed expansion of logging into Wildlife Habit and Recreation areas
- Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded

Thank you for taking my comments into consideration.

Sincerely,

John Rilling

From: [Kimberly Rosado](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines Alaska state land usage
Date: Thursday, June 4, 2026 5:35:14 PM

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I am a resident of Haines. I actually live on porcupine rd.

I in complete favor of any logging you want to do. We need to as a community to bring in economics. My family has left, others are leaving by the droves.

Please help save Haines!! Bring back logging our one and only for sure renewable resource.

Not to mention we are in dire need of clearing out dead Beatle kill, or we will just turn into another California. With no end in fires.

Thank you for your time in reading this.
Kimberly Rosado

From: [Irene Alexakos](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines State Forest
Date: Friday, June 5, 2026 12:11:13 PM
Attachments: [Haines State Forest .pdf](#)

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June 5, 2026

To: Alaska Division of Forestry

Re: Comment - 2026 Draft Haines State Forest Resource Management Area Management Plan Amendment

For over 100 years, the forests in this country and State have been destructively mismanaged, primarily for timber. Today, the situation is more dire than ever. We cannot afford to destroy what's left.

I am strongly opposed to the proposed new management plan.

Public lands in Alaska belong to every Alaskan. There is overwhelming agreement amongst Alaskans and the rest of the country for protecting forests. Those people who support mining & clear cut logging care about one thing: their own profit.

Standing forests provide far greater economic benefits than do logged ones. They offer scenic beauty, recreational activities, climate stability, and vital wildlife habitat. Healthy ecosystem qualities such as clean air and water, fish, wildlife and recreation generate far more jobs and economic benefits for communities than timber dollars ever could.

Small scale use such as for local home building and firewood is reasonable but timber sales frustrate me because the use of our monies for these purposes is so wasteful and destructive. It seems incredibly irresponsible to be considering more logging & mining.

Our forests are a significant carbon sink. That is, they absorb carbon dioxide from the atmosphere and reduce the concentration in the air. This is a vital component to addressing the most pressing issue of the planet, the climate crisis. Continuing to log & mine in forests will have long-term catastrophic environmental and economic consequences.

Deforestation is one of the tragedies of our time. It is also one of the most preventable. It poses unacceptable risks to clean water, wildlife and critical habitat.

Irene Alexakos

Haines, Alaska

From: [Mary Asper](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: comment re: Haines State Forest Resource Management Plan
Date: Friday, June 5, 2026 9:53:45 AM

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Please, no large scale logging in Haines! No benefits for Haines and loss of habitat! The beauty and health of our community does not fit with large scale logging!!!

Sent from my iPhone

From: [Alaina Birkel](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#); [Palmieri, Greg J \(DNR\)](#); [Dobell, Trevor \(DNR\)](#); [List, Ashley R \(DNR\)](#); [Douse, Jeremy A \(DNR\)](#); [Preston, Geneva S \(DNR\)](#)
Cc: [Chilkat Indian Village](#); [Kimberley Strong](#); [Brian Willard](#); [Avey Menard](#)
Subject: Chilkat Indian Village (Klukwan) HSF RMP Public Comment
Date: Friday, June 5, 2026 4:48:31 PM
Attachments: [image001.png](#)
[HSF RMPA Draft Public Comment Final 6-5-26.pdf](#)

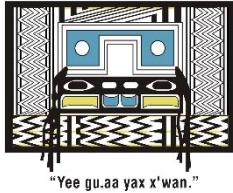
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Good afternoon, DFFP Officials,
Gunalchéesh for meeting with Chilkat Indian Village (Klukwan)'s Tribal Council on Tuesday, June 5. Attached is CIV's public comment regarding the draft management plan amendment. We appreciate DFFP's willingness to continue to engage with CIV and are looking forward to discussing these comments at a later date.

With care,
Alaina Birkel
Director of Intergovernmental Affairs
CHILKAT INDIAN VILLAGE



"Yee gu.aa yax x'wan."



An Indian Reorganization Act Village
Under Act of Congress June 15th 1935
32 Chilkat Avenue Klukwan, Alaska
 HC60 Box 2207 Haines, AK 99827
 Phone: (907) 767-5505
 Fax: (907) 767-5518
 Email: klukwan@chilkat-nsn.gov

June 5, 2026

Dear Division of Forestry and Fire Protection Officials,

The Chilkat Indian Village (Klukwan) Tribal Council appreciates the opportunity to submit our public comment on the Haines State Forest Resource Management Area (HSF)'s draft resource management plan amendment (RMPA). Chilkat Indian Village (Klukwan) (CIV hereinafter) is a sovereign and federally recognized Tribal Nation¹ whose 2.6-million-acre traditional territory encompasses the entirety of the HSF boundaries. The Village of Tlákw Aan (Klukwan), lands owned in fee simple by our Tribal Government, borders the HSF and has thrived for thousands of years.² As the original stewards of our unceded lands and waters, rights-holding landowners within our traditional territory, and business owners of the Jilkáat Kwáan Heritage and Bald Eagle Preserve Visitor Center, we submit the following comments on behalf of our Tribal Citizens.

Below is an outline of CIV's comments:

- 1. Manage the Haines State Forest Inclusive to Other Worldviews**
- 2. General HSF RMP Draft Recommendations**
 - a. Implement a Consultation Framework with CIV**
 - b. Interagency Cooperation**
 - c. Use Best Available Science to Inform Decision-Making**
 - d. Include Traditional Ecological Knowledge in the RMPA**
 - e. Assess Cumulative Effects**
 - f. Reclassify Subunit 4b and Realign Goals, Management Guidelines, and Management Intent**
 - g. Amend Chapter 3 to Limit or Remove Even-Aged Harvesting Methods**
 - h. Amend Chapter 2 by Including a Standalone Management Policy for Traditional Use**
 - i. Traditional Use is a Primary Purpose of the HSF RMA**
 - ii. Improper Definition of Traditional Use**
 - iii. Existence of Chilkat Bald Eagle Preserve Does Not Waive Department's Obligation to Manage for Continued Traditional Use Within HSF**
 - i. Amend Chapter 2 By Creating a Standalone Management Policy for Cultural Resources**
 - i. HSF RMP Must Ensure Cultural Resources Protection and Compliance with the Alaska Historic Preservation Act (AHPA)**
- 3. HSF RMP Draft Proposed Language**
 - a. Chapter 1**
 - i. 1-2 Differences Between State Forest Plan and Chilkat Bald Eagle Preserve Plan**

¹ CIV is a Tribal government with inherent sovereignty to protect our Tribal lands and the interests of our Tribal members. CIV is organized pursuant to the authority of the Acts of Congress of 18 June 1934 (48 Stat. 984) and 1 May 1936 (49 Stat. 1250) (Alaska IRA) and in accordance with Alaska IRA §§ 16 & 17. CIV is also federally-recognized by the U.S. Bureau of Indian Affairs. See 89 Fed. Reg. 9899, 99902 (Dec. 11, 2024).

² The Tlingit phrase "Tlákw Aan" means "Eternal Village" or "The Village That Has Always Been." Klukwan is the English translation.

- ii. **1-18: Modification of the Plan**
- b. **Chapter 2**
 - i. **2-3 Permits, Leases, and Plans of Operations for Non-Water Dependent Facilities**
 - ii. **2-4 Impacts on Subsistence**
 - iii. **2-13 Harvesting**
 - iv. **2-13 Even-Aged Harvest (Clearcuts)**
 - v. **2-25 Cooperative Research**
 - vi. **2-28 Management of Lands Designated Public Recreation**
 - vii. **2-44 Cooperation With Other Landowners**
 - viii. **Traditional Use (freestanding amendment)**
 - ix. **Cultural Resources (freestanding amendment)**
 - x. **Climate Change (freestanding amendment)**
- c. **Chapter 3**
 - i. **3-9 Subunit 1b Timber Harvest**
 - ii. **3-11 Mitigation of Impacts to Goat Habitat in the Kelsall Valley**
 - iii. **3-32 Subunit 4b**
- d. **Chapter 4**
 - i. **4-5/6: Five Year Timber Sale Schedule**
 - ii. **4-8/9 Future Research**
 - iii. **4-9: Fish and Wildlife Research**
- e. **Appendix A**
 - i. **Adaptive management**
 - ii. **Traditional Ecological Knowledge (TEK or TK)**

1. Manage the Haines State Forest Inclusive to Other Worldviews

The HSF draft RMPA is built upon assumptions about land, knowledge, and human-environment relationships that fundamentally differ from Jilkáat ontological, cosmological, and epistemological understandings. These differences reflect distinct ways of understanding the forest, how knowledge about it is generated, and what responsibilities we as humans hold toward it. Underlying DFFP's management role, for example, is a worldview and science that understands forests primarily as resources to be managed for human use and benefit. Agency decision-making relies on natural sciences, including forest ecology, where knowledge is often deemed legitimate through documentation, measurability, replication, and neutrality/objectiveness.³ While these approaches can provide valuable information, they are neither neutral nor comprehensive. Like all knowledge systems, Western management is shaped by values, assumptions, and relationships to the land and other beings, including the Jilkáat people, influencing what questions are asked, which information is prioritized, and what management outcomes are desired. In practice, this difference of worldviews often narrows how we are heard and understood, and results in management and decision-making that does not take our Indigenous perspectives and wisdom meaningfully into account.

CIV recognizes that management of the Haines State Forest is guided by the RMP and must conform with applicable state law, including the Haines State Forest enabling act, AS 41.15.300 *et seq.*, the Forest Resources and Practices Act (FRPA), AS 41.17, and Alaska's public land laws, AS 38.04 and AS 38.05.

³ There is no view from nowhere. All knowledge is shaped by the perspectives, experiences, values, and assumptions of those who produce it. While Western scientific and governance frameworks often emphasize objectivity and neutrality, scholars across numerous disciplines have demonstrated that knowledge is always situated within particular social, cultural, historical, and political contexts. The questions we ask, the methods we employ, the information we prioritize, and the conclusions we draw are all influenced by our relationships to the world around us. Recognizing that all knowledge systems are situated creates space for multiple ways of knowing to contribute to stewardship and decision-making.

Meaningfully engaging with and, where appropriate, applying Jilkáat knowledge is entirely consistent with the Division's statutory obligations and management principles. Indeed, robust data gathering and engagement across communities, disciplines, and perspectives is a fundamental element of the state's broad land management policy. This ensures that management is fundamentally well-informed and pays special attention to local communities' needs, expertise, connection to, and reliance on, local public lands. It is in this spirit, and in an attempt to translate principles from a Jilkáat worldview into the western- and State-based forest management framework, that CIV provides this commentary and substantive comment on the draft RMP.

Regional and site-specific land use plans must "consider physical, economic, and social factors affecting the area and involve other agencies and the public in achieving a systematic and interdisciplinary approach," AS 38.04.065(b)(2), and include significant stakeholders—affected local governments, state and federal agencies, adjacent landowners, and the general public. AS 38.04.065(b)(8); *see also* 11 AAC 55.020(b). Information exchange with affected parties is further outlined in the state's policy on land use classification and inventorying, noting that "[a]s funds and manpower are available, the commissioner shall provide local and federal governments and major private landowners with data from the inventory for the purpose of planning and managing the uses of land in proximity to state land." AS 38.04.060(c). These statutory and regulatory provisions highlight that sound land management relies on good data and diverse sources of information, appropriately weighted for the accumulated knowledge of contributing parties, along with consideration of the concentrated effects of management decisions on local residents. Taken together, these principles direct that CIV, as a sovereign government comprised of local community members whose ancestral territory comprises the Haines State Forest, and whose present-day fee lands sit adjacent to the exterior boundaries of the forest, is a rights-holder whose input can and should meaningfully inform forest management, and who stands to be uniquely affected by forest management decisions.

Jilkáat Kwáan refers to both our people and the 2.6 million acres of our traditional territory that have sustained us since time immemorial. In our worldview, land and people are inseparable; what happens to the land happens to us. Our interdependence can be understood through our governance, language, harvesting practices, and relationships—it is who we are. We believe that everything has a spirit—a *yákwahéiyagu*. It is the spirit within me that is the spirit that runs through all things. Our stewardship practices have reflected this understanding for thousands of years guided by *yáa at wooné* (respect), reciprocity, and balance, and are grounded by the principle *haa atxaayí haa kusteeýx sitee* (our food is our way of life). Our knowledge is passed down intergenerationally, emerging from our oral histories, lived experiences, harvest practices, and our relationships with the land and other beings, who we know as our relatives. As our Elder and ancestor Gooxdaakashú (Joe Hotch) said, *Dei héen wan xatáax'* (I am biting on the banks). Like the salmon who bite the riverbanks before they die, this act ensures the young fry know which direction to go to reach their final destination. For us, this means that we live like the salmon, biting on the banks so our younger generations know where we have come from and where to go and how to be.

Our worldview and knowledge do not always fit neatly within Western natural resource governance. What we understand as our obligations to our relatives, past and future generations, and the land can be mischaracterized or misunderstood. Our stewardship responsibilities are often interpreted through narrower categories of Western management: which agency has jurisdiction, which resource category/use is described, and whether our concern falls within the specific regulatory framework. Unfortunately, these responses often overlook the interconnected network of relationships we're observing. For example, when a Council member shares:

Council member and artist, opens with ancestral recognition because "without them, I would not be here". I come from a lineage of weavers, I am also a weaver of both basketry and woolen weaving. I practice subsistence. I'm going to limit to seven species: not ranked by value or

*priority, just a matter of [meeting] time. Related to balanced management for different uses: Species that use the forest lands we are talking about: **Mountain goats** are particularly sensitive to industrial activity and timber harvests. How is the Division of Forestry Fire Prevention working with Alaska Department of Fish & Game to prevent mountain goat population declines? We use mountain goat for their meat, wool, horns, bladders, hides, and tallow. **Marten** populations are also vulnerable to habitat destruction via logging. In my own lifetime I've seen a decline in porcupine populations. They are vulnerable to the timber industry and new roads where the porcupine were previously safe increases their risk of vehicle death. **Porcupine** we use their meat, quills, and guard hairs. **Swan** populations sensitive to habitat availability. **Ducks** are sensitive due to degradation of water quality and quantity. **Frogs** experience steep decline associated with habitat loss and fragmentation. **Salmon berries**, which are sensitive to habitat fragmentation, I believe were hurt by past logging activity. In addition to the berries as food for humans, birds, bears, other animals, the leaves are used for dye. Our language is a vessel for our culture. And art is a visual representation of our culture. It shows balance. And conveys identity, not just in the crests, but the materials used. All of these things are related to our identity, and if they are taken away, who am I?*

We are sharing observations of the cumulative effects of management decisions that profoundly affect our culture, identity, language, arts, harvesting, and way of life. Neither the impacts of agency decision-making nor our concerns align with administrative boundaries or agency authorities. This often reinforces governance with fragmented decision-making and limited accountability. Effective stewardship requires approaches that recognize and respond to the interconnections. Greater interagency collaboration, coordinated planning across jurisdictions, restoration work, and management frameworks that consider other knowledge and expertise can support CIV and DFFP's shared vision and goals—a healthy and thriving forest.

We want to be clear: we do not raise these concerns to shame or critique the Division of Forestry and Fire Protection or its staff. We name these concerns to acknowledge and highlight the tensions, assumptions, and gaps that often shape conversations between CIV and DFFP. We sincerely appreciate DFFP's willingness and commitment to engaging across these differences and firmly believe that the HSF RMPA presents an opportunity to create meaningful space for Jilkáat traditional ecological knowledge, stewardship principles, and lived experience to inform the management of our unceded lands.

2. General HSF RMP Draft Recommendations

a. Implement a Consultation Framework with CIV

We recommend that DFFP establish a formal consultation framework between CIV and DFFP in Chapter 4 of the draft RMPA.⁴ Formalizing the relationship between CIV and DFFP, strengthens our long-term relationship, reduces the risk of knowledge transmission loss through any staff turnover, and creates more consistent opportunities for our knowledge, stewardship practices and principles, and community priorities to inform management decisions. A consultation framework should include the following rights and procedures:

- Establish regular, at least quarterly meetings, to discuss issues of mutual concern regarding forest management and RMP implementation, including:
 - Discuss the management of state forest land and provide management recommendations to the Director, DOF.

⁴ The proposed consultation framework emerges from Tanana Valley State Forest Resource Management Plan (2025) where DFFP has committed similar rights and procedures for the Tanana Valley Citizen's Advisory Committee. [Chapter 3 of the Nez Perce-Clearwater National Forests' Land Management Plan](#) provides further examples of management intent, goals, policies, and guidelines that could be created for the HSF (see pages 69-72).

- Review issues and activities on DNR-managed forested land and recommend management policies to the Director, DOF.
- Provide early and timely notice to CIV regarding updates and amendments to HSF RMP and any Five-Year Schedule of Timber Sales. CIV may, at its discretion or on its own motion, review and provide recommendations to the DOF on updates and amendments to these documents.
- Notify CIV of any forest resource use activity requiring a Forest Land Use Plan (FLUP) or Best Interest Finding (BIF) (including reforestation and transportation schedules), and solicit and meaningfully consider input received.

b. Interagency Cooperation

We recommend that the HSF RMPA include stronger direction in its management guidelines and intent regarding interagency cooperation, coordination, and information sharing. The ecological, cultural, and traditional use values the agency authorities of the Haines State Forest. Management decisions affecting forests, fish and wildlife habitat, watersheds, recreation, subsistence resources, and cultural landscapes often involve multiple agencies with overlapping responsibilities and expertise.

Throughout this planning process, CIV has repeatedly identified issues that span agency jurisdictions, including habitat connectivity, cumulative watershed effects, salmon habitat protection, wildlife populations, climate impacts, and subsistence resource conditions. Addressing these issues effectively requires coordination among DFFP, ADF&G, DEC, DPOR, DMLW, Tribal governments, federal agencies, academic institutions, and other partners, including any parties exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325.

CIV recognizes that DFFP cannot independently address all aspects of these complex issues. However, the management plan can establish an expectation that DFFP will actively coordinate with other agencies and partners to ensure management decisions are informed by the best available information and a broader understanding of ecosystem conditions. This recommendation is not meant to undermine the collaborative work that DFFP has undertaken. It is to suggest that including more specific language, intent, and clear process can provide stronger guideposts for the multiple-use management of the HSF. Strengthening interagency cooperation would improve information sharing, reduce fragmented decision-making, and support more effective, adaptive, and holistic stewardship. Additionally, outlining this approach more clearly in the RMP ensures alignment with the statutory framework for coordinated management under AS 41.15.315 and makes use of cooperative agreement authorities under AS 41.15.325, supported by broader land use and forest management law. AS 38.05.027; AS 41.17.055(e).

c. Use Best Available Science to Inform Decision-Making

CIV recommends that the HSF RMPA be amended to include policy language committing to using the best available science, including Indigenous Knowledge, in management decision-making. Throughout this planning process, CIV has raised questions regarding wildlife populations, habitat connectivity, cumulative watershed effects, subsistence resource conditions, carbon sequestration, and other ecological concerns that may be affected by management activities within the HSF. In response, DFFP has noted that certain forms of monitoring and scientific assessment may fall outside the agency's authority, expertise, or available resources. CIV recognizes these limitations. However, the absence of agency-led monitoring does not diminish the importance of incorporating the best available information into management decisions. The management plan should acknowledge that scientific research, Indigenous Knowledge, agency data, and monitoring conducted by Tribal governments, academic institutions, nonprofit organizations, and other partners can provide valuable information for understanding changing conditions within the Haines State Forest.

The amended plan should encourage collaboration with partners and support the consideration of new information as it becomes available. This approach would help ensure that management decisions are

informed by current knowledge, improve understanding of long-term ecological trends, and strengthen DFFP's ability to respond to changing environmental conditions. Incorporating this principle into the management plan would provide a framework for adaptive management while recognizing the valuable contributions of partners engaged in research, monitoring, and stewardship throughout the Chilkat Valley.

d. Include Traditional Ecological Knowledge in the RMPA

CIV recommends that TEK be given a definition and a role in management decisions in the RMPA. TEK can help shape the management guidelines for units within the forest, it can be identified as a source of data to be sought out and, where appropriate, relied on in resource inventories throughout the forest, and it can be applied as a management intent on a unit-specific basis. Each and any of these approaches would meaningfully improve the broad base of relevant experience, data, information, and expertise upon which DFFP draws in its management of the Haines State Forest.

The FRPA provides statutory guidance and direction for forest management in Alaska and establishes an interdisciplinary framework for ensuring sound forest management based on the best available data. AS 41.17.060(b) states that “*to the maximum extent possible*, all applicable data and information of applicable disciplines shall be updated and used in making decisions relative to the management of forest resources.” (emphasis added).

Traditional ecological knowledge (TEK)⁵ is an applicable discipline that generates meaningful data and information directly relevant to sound forest management. To date, forest management in the Haines State Forest has neither applied nor sought to gather or engage with the data and information that resides in and through TEK. As the Indigenous inhabitants of the area, CIV and its members are TEK-holders whose experiential knowledge of the Haines State Forest spans millennia and can contribute meaningfully, and irreplaceably, to the range of data and information upon which DFFP bases its forest management practices.

Applying TEK in forest management is consistent with the Department’s broader land use planning and classification responsibilities. AS 38.04.065 states that, in adopting and revising regional or site-specific land use plans, the commissioner shall “consider physical, economic, and social factors affecting the area and involve other agencies and the public in achieving a systematic interdisciplinary approach.” AS 38.04.065(b)(2). TEK provides insight into, and generates meaningful and applicable data for, each of these factors (physical, economic, and social factors). DFFP should embrace the interdisciplinary approach mandated by the FRPA and engage with CIV as distinct knowledge-holders whose contributions to the body of data and information regarding forest management are invaluable.

⁵ TEK (or TK), for purposes of this letter, means “a living body of knowledge which pertains to explaining and understanding the universe and living and acting within it. It is acquired and utilized by indigenous communities and individuals in and through long-term sociocultural, spiritual, and environmental engagement. TK is part of the broader knowledge system of indigenous communities, is transmitted intergenerationally, is practically and widely applicable, and integrates personal experience with oral traditions. It provides perspectives applicable to an array of human and nonhuman phenomena. It is deeply rooted in history, time, and place, while also being rich, adaptable, and dynamic, all of which keep it relevant and useful in contemporary life. This knowledge is part of, and used in, everyday life, and is inextricably intertwined with peoples’ identity, cosmology, values, and way of life. Tradition—and TK—does not preclude change, nor does it equal only ‘the past;’ in fact, it inherently entails change.” Raymond-Yakoubian, Julie, Brenden Raymond- Yakoubian and Catherine Moncrief. The incorporation of traditional knowledge into Alaska federal fisheries management. *Marine Policy* 78 (2017): 133. This definition has been adopted and applied in a co-management agreement entered into between the United States Department of the Interior agencies, Bureau of Indian Affairs, Bureau of Land Management, Fish and Wildlife Service, Geological Survey, National Park Service, Association of Village Council Presidents, Council of Athabaskan Tribal Governments, Kawerak Incorporated, Kuskokwim River Inter-Tribal Fish Commission, Native Village of Eagle, Nome Eskimo Community, Tanana Chiefs Conference, and Yukon River Inter-Tribal Fish Commission.

e. Assess Cumulative Effects

The state's best interest finding process requires that a BIF and associated administrative review be appropriately scoped to assess "reasonably foreseeable, significant effects" of a proposed use. AS 38.05.035(e)(1)(a). Additionally, the director has discretion to narrow a review and finding to "facts pertaining to the land, resources, or property, or interests therein" which are "material to the determination."

Owing to the interconnected nature of the ecological, physical, and spiritual conditions present within the Haines State Forest, the director should acknowledge that each proposed use of forest resources requiring a FLUP and BIF necessarily have effects on one another and on the forest at large. As such, a FLUP and BIF for any forest resource use activity within the HSF should consider cumulative impacts of other use activities proximate in time or place. These concerns are "material" to the determination of whether a proposed disposal best serves the interests of the state. AS 38.05.035(e)(1)(B)(iii).

f. Reclassify Subunit 4b and Realign Goals, Management Guidelines, and Management Intent

Subunit 4b (Chilkat Ridge) is located directly across from the Village of Klukwan. Chilkat Ridge is seen as part of the framework of our food bowl that surrounds the Village, integral to holding the salmon for the next season and the season that follows. It is our security—our comfort and peace, as if the Chilkat Ridge and surrounding mountains wrap themselves around us during our long winter months. We see the ridge as creating a layer of protection for us: a filter for the air during sandstorms, a blockade to strong winds rushing up the Jilkáat Valley, a sound barrier to helicopter noise disturbances. Physically, and spiritually, Chilkat Ridge feeds us. It is a presence and feeling that cannot be described in the English language but is ingrained in us as part of who we are as Jilkáat people. Chilkat Ridge has been a harvesting area for our people for thousands of years (Figure 1). Traditionally, as Kaagwaantaan lands, we have stewarded, through our customs and laws, and been sustained by this area since time immemorial (Figure 1).

CIV requests that the DFFP change the land use classifications from *forestry* to *wildlife habitat* to align with the area's highest and best long-term use. Chilkat Ridge's current classification has the potential to significantly alter how this area has historically functioned as an intact wildlife habitat and traditional use landscape. We believe that land classifications should reflect the public values associated with an area and provide management direction consistent with those values. Beyond its significance to who we are, Chilkat Ridge supports wildlife habitat, contributes to landscape-scale ecological connectivity, supports our tourism economy at the Jilkáat Kwáan Heritage and Bald Eagle Preserve Visitor Center, and sustains the traditional uses of the HSF relied upon by Tribal Citizens and other local residents. Despite DFFP's interest in the commercial value of the timber of area and supporting other industrial uses, the ecological, cultural, tourism, and subsistence/traditional use values of Chilkat Ridge are the defining characteristics of the subunit and provide substantially greater long-term benefits to the public.

g. Amend Chapter 3 to Remove or Limit Even-Aged Harvesting Methods and Scale

CIV appreciates the steps DFFP has taken in the draft plan to add stand parameters to different subunits of the forest. However, we recommend that DFFP prioritize partial-cut and selective harvesting in all wildlife habitat and public recreation designated lands and reflect these priorities in management guidelines for each unit and subunit. CIV also recommends including stand parameters on forestry designated lands in order to effectively preserve the "future options of the people of the state," AS 41.17.060(c)(1), and in respect of the other resource constraints and balances developed through the FRPA. AS 41.17.060(c)(2)-(7). CIV expresses its concern that clearcut, or even-age harvest, of timber in any unit of the Haines State Forest, cannot be accomplished without significant impairment of the

productivity of our lands and waters, and our traditional uses of the HSF.⁶ Clearcutting at any scale threatens to sever the sustained connections between wildlife habitat, recreation, and our traditional uses of the HSF, in addition to the ecological function of Jilkáat Aaní.

h. Amend Chapter 2 by Including a Standalone Management Policy for Traditional Use
i. Traditional Use is a Primary Purpose of the HSF RMA

Traditional use is named explicitly as one of the Forest’s primary purposes. “The primary purposes for the establishment of the Haines State Forest Resource Management Area are the utilization, perpetuation, conservation, and production of the land and water *including but not limited to the use of renewable and nonrenewable resources* through multiple-use management *and the continuation of other beneficial uses including traditional uses* and other recreational activities.” AS 41.15.300 (emphasis added). While the department is directed to manage the forest under “principles of multiple use and sustained yield,” AS 41.15.315(a), this mandate coexists with the obligation “that an opportunity for continued traditional use of the Haines State Forest Resource Management Area at levels and by traditional methods and means is guaranteed. The traditionally compatible uses include but are not limited to fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood.” AS 41.15.315(b). While this specific portion of the statute serves as a buffer against ADF&G’s regulation of fish and game resources, the department ultimately must ensure that its forest management policy fulfills the forest’s statutory purposes. “The responsibility for the management, control, development, and maintenance of the Haines State Forest Resource Management Area . . . is assigned to the department.” AS 41.15.300(b). As the enabling legislation makes clear, this means multiple use management and the continuation of beneficial uses, “including traditional uses.”

Other valuable resources within the forest have standalone management policies, including fish and wildlife habitat, forest timber resources, forest protection, recreation, subsurface resources and materials, transportation, and water quality, quantity, and riparian areas. Recognizing that “traditional use” is not a land classification that exists under Alaska law or regulation⁷, it must still be acknowledged and managed under the RMP and afforded the same level of attention as other valuable resources for the Department to fulfill the forest’s purposes.

ii. Improper Definition of Traditional Use

Currently, traditional use is treated only as a subcategory of recreational uses, despite its presence in the legislative scheme as a standalone and explicitly identified beneficial use. Concerningly, the definition the department applies to traditional use⁸ does not rely on the HSF enabling statute (which helpfully lists the types of traditionally compatible uses throughout the forest) but instead applies the definition of “traditional means of access” as defined under AS 38.04.200.⁹ The HSF RMA was established in 1982,

⁶ Under multiple use management on state lands, “there may not be significant impairment of the productivity of the land and water with respect to renewable resources.” AS 41.17.060(c)(5); meaning “an activity that may foreseeably result in prolonged or substantial damage to renewable resources or prolonged or substantial reduction of the continuing capability of the land or water to produce renewable resources at their natural or historic levels.” AS 41.17.950(23).

⁷ 11 AAC 55.040-230.

⁸ HSF RMA public review draft at 2-31 “Traditional means of access as well as access to traditional use areas will be maintained in the Forest . . . The definition of, and protection for, traditional uses is further established in AS 38.04.200.”

⁹ “‘traditional means of access’ means those types of transportation on, to, or in the state land, water, or land and water, for which a popular pattern of use has developed; the term includes flying, ballooning boating, using snow vehicles, operation of all-terrain vehicles, horseback riding, mushing, skiing, snowshoeing, and walking; ‘traditional outdoor activities’ means those types of activities that people may use for sport, exercise, subsistence, including the harvest of foodstuffs, or personal enjoyment, including hunting, fishing, trapping, gathering, or recreational mining,

fifteen years before this legislative amendment to the Alaska Lands Act provided definitions for “traditional means of access” and “traditional outdoor activities.”¹⁰ In any event, the HSF legislation does not use the terms “traditional means of access” or “traditional outdoor activities.” These terms should not be conflated with “traditional use,” “at levels and by traditional methods and means,” and “traditionally compatible use” that do appear in the HSF legislation.

The state legislature did not mean “traditional means of access” when it established traditional use as a primary purpose of the Haines State Forest. In the context of developing this land unit at the same time as the Chilkat Bald Eagle Preserve, and in guaranteeing continued traditional use at levels and by traditional methods and means in both land units, the legislature meant to ensure that then-longstanding lifeways and local use practices, built up over millennia, would be considered, preserved, and maintained even in the context of opening up the state forest to sustained yield and multiple use management. This is underscored by the types of traditional uses listed in the statute, along with the legislature’s statement that they are inherently compatible with multiple use management of forest resources and regulation of fish and game.

Traditional use needs to be correctly understood, defined, and managed for continuation in order to fulfill the department’s statutory obligations. It cannot be conflated with traditional means of access or swallowed up by recreation. Neither previous RMPs nor this draft RMP provide management direction for the continuation of traditional use, because the management plan does not even properly define what it means. Resource management throughout HSF must balance the multiple use mandate with the continuation of compatible traditional uses, which, as noted in the statute, includes fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood. While the department has surveyed residents about areas where they practice traditional use, this survey data is incomplete, inadequate, and incommensurate with the scope, breadth, and depth of actual traditional uses of the forest.

The Forest Resources and Practices Act (FRPA) requires that an “operational level forest inventory” be completed before adopting a management plan for that forest, AS 41.17.230, and that all forest management plans, based on the inventory, consider and permit “other traditional uses.” Traditional use must be identified, inventoried, analyzed, and managed as a resource value present throughout the forest, just like the other resources that the department manages. This must be based upon information and data indicating what, where, and how traditional uses are practiced.

To do so requires both a framework and a process for engagement with the people who practice traditional use in the forest—this means the local community, particularly those who historically and presently engage with the forest and its resources in traditional ways. While recognizing that this may not exclusively mean the Indigenous community, it does necessarily and largely include members of the Chilkat Indian Village as local community members who have and do make traditional use of the forest and its resources. This is particularly true of subsistence practices identified as a “traditionally compatible use” of the forest.

The coexistence of traditional uses, specifically including subsistence, with multiple use resource management, is consistent with and mandated by the HSF legislation. As such, the HSF RMP should reflect in its management policy a clearly articulated process by which it pursues the dual aims of the Haines State Forest, assessing impacts of each set of practices on the other, and ensuring that multiple use management harmonizes with the continuation of other beneficial uses, including traditional use.

and that have historically been conducted as part of an individual, family, or community life pattern on or in the state land, water, or land and water.” AS 38.04.200(b)(2)-(3)

¹⁰ SLA 1997, ch. 65, § 4.

iii. Existence of Chilkat Bald Eagle Preserve Does Not Waive Department's Obligation to Manage for Continued Traditional Use Within HSF

The department identifies two sources of legislative evidence to diminish the role of traditional use in the Haines State Forest. Neither is supportable, as they are contrary to the plain meaning of the statute and a coherent construction of the whole act. First, the department notes that “[t]he traditional way of life of the Chilkat Valley communities is recognized as an important value and its continuation is included in the management of the preserve.”¹¹ The department is likely referencing AS 41.21.610(b)(5), which notes that one of the primary purposes in establishing the Chilkat Bald Eagle Preserve (CBEP) is to “provide an opportunity for the continued traditional and natural resources based lifestyle of the people living in the general areas . . . consistent with the other purposes of this subsection.” Secondly, the department notes the statement from the Alaska legislature that “the establishment of the Alaska Chilkat Bald Eagle Preserve and the Haines State Forest Resource Management Area under AS 41.15.305 is determined to represent a proper balance between the preservation of state public domain land and water for bald eagle preserve purposes and state public domain land and water more appropriate for multiple use.”¹² AS 41.21.610(c).

The department is correct in identifying that the exclusive use framework for the CBEP prohibits multiple use management and strictly regulates commercial activities within the preserve in order to protect, among other things, the local community's patterns of traditional and natural resource use.¹³ However, it does not follow that the department has no obligation to manage the Haines State Forest for the full range of purposes for which it was established. Neither can the legislative statement of “proper balance” found in AS 41.21.610(c) be used to diminish or contravene the HSF enabling legislation's clear statement that the forest be managed for the continuation of traditional uses and other recreational activities. The “proper balance” provision dealt with the boundary determinations for the two public lands in an effort to prevent later attempts to reconfigure the scope of either the forest or the preserve. It does not speak to or diminish the purposes for which the state forest was established beyond the fact that it reaffirms that multiple use management is part of the forest's purpose. It remains clear on the face of the HSF statute: the primary purposes for the Haines State Forest are multiple use management *and* the continuation of other beneficial uses including traditional use. The HSF RMP must reflect this mandate and operationalize the department's management responsibilities.

It is also noteworthy that there is a traditional use guarantee in both the HSF and CBEP legislation:

Continued opportunities for traditional uses of the Alaska Chilkat Bald Eagle Preserve at levels and by methods and means that are compatible with the protection of the bald eagle population are guaranteed. These historically compatible uses include but are not limited to hunting, trapping, fishing, berry picking, other subsistence and recreational uses, operation of motorized vehicles, and the harvesting of personal-use firewood,” AS 41.21.618;

An opportunity for continued traditional use of the Haines State Forest Resource Management Area at levels and by traditional methods and means is guaranteed. The traditionally compatible uses include but are not limited to fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood. AS 41.15.315.

¹¹ HSF RMA public review draft at 1-2.

¹² *Id.* at 1-2-3.

¹³ *Id.* at 1-2 (“The Preserve in contrast has an ‘exclusive use’ management intent described in statute.”).

The department cannot point to the continuation of traditional uses in the CBEP and call it a day—doing so would make the HSF’s own legislative guarantee of continued traditional use meaningless and would fall short of the department’s statutory obligations.

The Department should develop a management policy for traditional use in the HSF RMP. Chapter 2 of the draft RMP establishes forest-wide land management policies “for each resource or land use category.”¹⁴ The framework applied to each identified resource is broken down into goals and management guidelines. This framework should be applied to establish a management policy for traditional use within the forest, according to the recognition that it is due under the enabling statute. Without a management policy for traditional use, it is difficult if not impossible to ensure that the department is meeting its statutory obligations in managing the forest for “multiple use management *and other beneficial uses including traditional uses* and other recreational activities.”

i. Amend chapter 2 by Creating a Standalone Policy for Cultural Resources
i. HSF RMP Must Ensure Cultural Resources Protection and Compliance with the Alaska Historic Preservation Act (AHPA)

The proposed RMP fails to adequately address the protection, identification, and management of cultural resources within the planning area. The current draft references cultural resources only briefly in the transportation section¹⁵ and does not contain a dedicated cultural resources management framework. This omission is contrasted with other, adopted, Alaska Department of Natural Resources planning documents, including the Tanana Valley State Forest Management Plan, which contains a standalone section devoted to cultural resource identification, consultation practices, and protections.

The Tanana Valley State Forest Management Plan provides a strong example of the type of cultural resource protections that should be incorporated into the Haines State Forest Plan Amendment. That plan explicitly recognizes DNR’s obligations regarding cultural resources and establishes procedures for identifying and determining the significance of cultural resources through surveys conducted through cooperative efforts with state, federal, and Tribal organizations. It further includes protective measures requiring review of proposed land uses and management activities for conflicts with cultural resource values and directs cooperation with tribal organizations and other stakeholders to develop mitigation and avoidance guidelines. This ensures consistency and compliance with AS 41.35. The plan also establishes practical protections, including consultation requirements with the Office of History and Archaeology (OHA) and buffer and avoidance requirements around identified cultural sites.

Most importantly, the Tanana Valley State Forest Management Plan acknowledges the incompleteness of existing cultural resource inventories and provides procedures for inadvertent discoveries. The plan recognizes that only a small portion of Alaska has been surveyed for cultural resources and therefore requires work stoppage and consultation with OHA and tribal groups if previously unidentified cultural resources are discovered during project activities. Similar language is absent from the proposed Haines State Forest amendment despite the high likelihood that undocumented cultural and historic resources exist within the project area.

The failure to include meaningful cultural resource protections appears inconsistent with the requirements and policy objectives of the AHPA. Alaska Statute 41.35.010 declares that “it is the policy of the state to preserve and protect the historic, prehistoric, and archeological resources of Alaska from loss, desecration, and destruction so that the scientific, historic, and cultural heritage embodied in these resources may pass undiminished to future generations.” The statute further states that these resources are “properly the subject of concerted and coordinated efforts exercised on behalf of the general welfare of

¹⁴ *Id.* at 2-1.

¹⁵ HSF RMP draft amendment at 2-41.

the public.” The current amendment does not reflect such concerted or coordinated efforts. Without clear standards for surveys, tribal consultation, avoidance measures, inadvertent discovery protocols, or coordination with OHA, tribal groups, and other stakeholders, the amendment risks authorizing activities that may damage or destroy irreplaceable cultural resources in violation of the policy goals and procedural requirements embodied in the AHPA.

Accordingly, the Department should revise the proposed amendment to include a standalone cultural resources section modeled on the Tanana Valley State Forest Management Plan. At minimum, the revised plan should: (1) require cultural resource review prior to approving land use or development activities; (2) establish consultation procedures with Alaska Native Tribes and the Office of History and Archaeology; (3) require protective buffers and avoidance measures for identified sites; (4) include mandatory inadvertent discovery protocols; and (5) expressly acknowledge and implement the preservation policies established under the Alaska Historic Preservation Act.

3. HSF RMP Draft Public Comment Proposed Language

CIV has prepared draft language to consider for adoption in the RMP. The following proposals apply the reasoning and analysis provided in section 1 of this public comment. Proposed language to amend the HSF RMP draft, including freestanding amendments, are provided within parentheses (“”). Additional formatting or suggested edits that are not feasible through this formatting convention are otherwise noted in *italics*.

a. RMP Chapter 1

i. 1-2 Differences Between State Forest Plan and Chilkat Bald Eagle Preserve Plan

The traditional way of life of the Chilkat Valley communities is recognized as an important value and its continuation is included in the management of the Preserve. “Traditional use of the Haines State Forest is also a primary purpose of the forest, which will be managed for this value alongside and in alignment with multiple use principles.”

ii. 1-18: Modification of the Plan

The land use designations, the policies, and the management guidelines of this plan may be changed if conditions warrant. The plan can be updated to address changes in State statute affecting the Haines State Forest Resource Management Area and DNR management direction of Forest resources. State agencies assigned a collaborative role in managing the important resources of the Forest with DFFP, (ADFG, DMLW, and DPOR), “statutory rights holders to consultation on forest management and plan development (each local fish and game advisory committee with jurisdiction in the area, the Alaska Chilkat Bald Eagle Preserve Advisory Council, the governing bodies of each municipality in the general area, and any party exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325),” as well as the public, may propose changes to DFFP initiating the Forest Plan review process and possible amendment.

b. RMP Chapter 2

i. 2-3 Permits, Leases, and Plans of Operations for Non-Water Dependent Facilities

Where it is not feasible to maintain a setback adjacent to fish habitat, public water supplies, or recreational waters, other measures will be implemented to meet the intent of this guideline. “Any facility or project occurring on or near a river, lake, or stream important for the spawning, rearing, or migration of anadromous fish shall comply with the requirements of AS 16.05.871.”

ii. 2-4 Impacts on Subsistence

Potential impacts to subsistence activities will be considered in management decisions and through consultation with ADFG “and other entities holding rights to consultation under statute or a cooperative management agreement” similarly to other sustainable resources found in the Forest.

iii. 2-13 Harvesting

Harvest methods may be chosen to meet harvesters’ capabilities, specific current site conditions, intended site conditions, or other resource considerations for diverse management of forest stands. “Harvest methods may include and be informed by principles of adaptive management and, where appropriate, traditional ecological knowledge (TEK).”

iv. 2-13 Even-Aged harvest (Clearcuts)

Items considered when reaching a decision will be topography, proximity to other natural or artificial open areas, visual effects, effects on fish and wildlife habitats, “effects on traditional use and areas of traditional use,” regulation requirements, transportation and harvest system function, and relative total costs of preparation, logging, and administration. “Decisions shall be made in consultation with the appropriate consulting parties under AS 41.15.310 and 41.15.325.”

v. 2-25 Cooperative Research

The DFFP will work with other agencies “, any party exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325 or a resource study under AS 41.15.310(b),” and landowners to assess forest resource impacts . . . providing support for other agencies “and entities” leading research projects in the Forest.

vi. 2-28 Management of Lands Designated Public Recreation

F. The DFFP shall coordinate with DPOR “and other parties with rights to consultation under AS 41.15.310 and AS 41.15.325” in the management of recreational activities in areas where the Preserve adjoins the Forest.

vii. 2-44 Cooperation With Other Landowners

Participate with other landowners in cooperative watershed management programs designed to maintain the water quality of local streams and rivers “, including through cooperative management agreements executed pursuant to AS 41.15.325”.

viii. Traditional Use (freestanding amendment to Chapter 2)

“Traditional Use

The Haines State Forest will be managed for multiple uses along with the “continuation of other beneficial uses including traditional uses and other recreational activities.” AS 41.15.300. Regulation of fish and game resources in the Haines State Forest must guarantee the opportunity for continued traditional use “at levels and by traditional methods and means.” AS 41.15.315. Traditionally compatible uses in the Haines State Forest “include but are not limited to fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood.” The DFFP will coordinate management and pursue cooperative agreements with other entities where appropriate to support continued opportunities for traditional use, as outlined in AS 41.15.300 *et seq.* The department further recognizes that some traditional uses in the Haines State Forest include the exercise and expression of traditional ecological knowledge (TEK) as a historic and present-day practice. Where another management policy exists for a resource that is subject to traditional use, such as fish and wildlife or recreation, the department shall aim to accomplish the goals and management guidelines of each management policy.

Goals

1. Identify traditional uses and areas where traditional use is practiced in the Haines State Forest through engagement with individuals and communities that practice traditional use in the Haines State Forest.
2. Protect continued access to areas of traditional use for fishing, hunting, trapping, berry gathering, plant harvesting, other forms of subsistence, and culturally significant sites.
3. Preserve culturally important landscapes, trails, camps, and traditional harvesting areas.
4. Ensure overall forest management sustains capacity for intergenerational transfer of practices of traditional use at levels and by traditional methods and means.
5. Where appropriate, apply traditional ecological knowledge (TEK) in management of Forest resources.

Management Guidelines

1. Identification

Identify traditional uses in the Haines State Forest, including traditionally compatible uses, levels and traditional methods and means, and areas where traditional use is practiced. Identification should include the following:

- A. Consult with individuals and communities that practice traditional use in the Haines State Forest, including local Alaska Native Tribes.
- B. Utilize available statutory authorities pursuant to AS 14.15.310 and 41.15.325 to develop resource studies and cooperative agreements with individuals and community groups that practice traditional use to identify traditional uses, areas of traditional use, and management policies for continuation of traditional use.
- C. Acknowledge the special expertise of traditional ecological knowledge (TEK) holders as highly informed on traditional uses of the Haines State Forest.
- D. Where appropriate as determined by TEK holders, seek and incorporate TEK into resource identification, planning, monitoring, and management.

2. Mitigation

All Forest resource use activities should be conducted with planning and implementation to avoid or minimize adverse effects on opportunities for traditional use within the forest. Mitigation should include the following:

- A. Address adverse effects on traditional use and access to areas of traditional use in Best Interest Findings (BIFs) and Forest Land Use Plans (FLUPs), in coordination with affected individuals and communities who practice traditional use, with the goals of identification, assessment, avoidance, and mitigation.
- B. Engage in early and ongoing consultation with potentially affected Alaska Native and Tribal communities regarding project effects on traditional use.
- C. Avoid loss of access to known areas of traditional use during resource development activities.
- D. Maintain habitat conditions necessary for subsistence resources, including salmon, moose, berries, medicinal plants, and other traditional resources.
- E. Avoid management actions and Forest resource use activities that substantially reduce access to or availability of subsistence resources and other traditional uses.

3. Continuation

All Forest resource use activities should be designed to encourage continuation of traditional use of the Haines State Forest. Continuation should include:

- A. Evaluate cumulative impacts of Forest resource use activities on traditional use and areas of traditional use.
- B. Where appropriate as determined by TEK holders, seek and incorporate TEK into resource identification, planning, and management, monitoring.

- C. Consistent with FRPA, AS 41.17, and multiple use management guidelines, ensure resource management in the Haines State Forest considers future generations and the continuation of traditional use.
- D. Avoid management decisions that fragment intact landscapes that bear cultural significance and support traditional use.
- E. Maintain traditional means of access for traditional use and to areas of traditional use, pursuant to AS 38.04.200.

4. Other Guidelines Affecting Traditional Use

Several other guidelines in this chapter may affect traditional use. For details, see the following sections of this chapter:

- Fish and Wildlife
- Forest Timber Resources
- Forest Protection
- Recreation
- Subsurface Resources and Materials
- Transportation
- Water and Riparian Areas
- Cultural Resources*
- Climate Change*

Resource Allocation Summary

The local community has made use of the Haines State Forest in traditional ways from time immemorial, through the establishment of the Haines State Forest Resource Management Area, and into the present day. AS 41.15.300 recognizes that one of the primary purposes of the Haines State Forest is the continuation of traditional use, which includes the subsistence lifestyle practiced by many local residents. Traditional use is practiced throughout each unit and subunit of the Haines State Forest, although the specific location, frequency, significance, and variety of uses remain underexamined. Active efforts should be made to identify and thereafter ensure continuation of traditional uses, and the resources on which they rely, throughout the forest. The department will continue to identify units and subunits where traditional use is a present resource value and develop unit and subunit management intent and guidelines accordingly.

Because of the value of traditional use to the local community, and the significance of traditional use in the Haines State Forest enabling statute, the Forest Plan encourages the identification, collaboration, study, and management policy to ensure continued opportunities for traditional use. Management policy will be informed and improved through resource studies, coordinated management, and cooperative agreements with individuals and communities that practice traditional use of the Haines State Forest and its resources.”

Traditional Use should be listed in all resource management policies, in the section titled “other guidelines affecting” resource “x”.

ix. Cultural Resources (freestanding amendment to chapter 2)

The proposed draft language is modeled after Chapter 2 of the Tanana Valley State Forest (TVSF) which includes “cultural resources” as an overarching management policy for the major resources, land categories, or management concerns affected by the plan. CIV recommends adopting the following language for the HSF:

“Cultural Resources

In accordance with the Alaska Historic Preservation Act of 1971 (AS 41.35) it is the policy of the state to preserve and protect the historic, prehistoric, and archeological resources of Alaska from loss, desecration, and destruction so that the scientific, historic, and cultural heritage embodied in these resources may pass undiminished to future generations. Examples of cultural resource sites that could be encountered include (but are not limited to): historical cabin remains (collapsed, standing, or foundations); historic trails; adits; dredges or other mining equipment; cultural depressions or pits; graves or cemeteries; prehistoric tools or artifacts; paleontological (fossilized) remains; and tribal sacred sites.

Goals

1. Identify cultural resources within the Haines State Forest.
2. Preserve and protect cultural resources consistent with AS 41.35.
3. Ensure forest resource use activities avoid adverse effects on cultural resources.
4. Coordinate and cooperate with potentially affected Tribes in developing cultural resource identification and protection protocols.

Management Guidelines

1. Cultural Resource Identification

DNR identifies and determines the significance of cultural resources in the Haines State Forest through:

- A. Cultural resources surveys conducted by Tribal partners, qualified DNR personnel, or pre-qualified and agency approved professional organizations.
- B. Encouragement of research on cultural resources within the Haines State Forest by qualified individuals and organizations, including Tribes.
- C. Cooperative efforts between state, federal, and Alaska Native entities for planned surveys and inventories.

Cultural Resource Protection

Protect cultural resources through the following actions:

1. Review proposed land uses and management activities for potential conflicts with cultural resources values.
2. Cooperate with potentially affected government agencies, Alaska Native entities, statewide or local groups, and individuals to develop guidelines and recommendations on how to avoid identified or potential conflict.

Cultural Resources in Timber Management Areas

The Division of Parks and Outdoor Recreation Office of History and Archaeology (OHA) will review proposals for timber management activities through the interagency review processes for the Five-Year Schedule of Timber Sales and Forest Land Use Plans for individual sales. Areas of known historic, archaeological, paleontological, or Tribal sacred sites should not be disturbed. Timber operations shall not occur within 300 feet from the boundaries of known sites unless the OHA determines, in consultation with the DOF and potentially affected Tribes, that certain activities can occur without impacting the cultural resource. The OHA will, within the limits of staffing and funding, assess the extent and significance of the cultural resource and work with the DOF and affected Tribes to develop site-specific avoidance, minimization, or mitigation measures to balance heritage preservation needs with timber management. In the event that staffing or funding limitations prevent OHA personnel from performing these surveys, they may be contracted out to qualified cultural resource professionals or tribes.”

Cultural Resources should be listed in all resource management policies, in the section titled “other guidelines affecting” resource “x”.

x. Climate Change (freestanding amendment to chapter 2)

“Climate Change

Alaska’s forests are experiencing the impacts of climate change. Alaska’s fire seasons are beginning earlier and lasting longer. Fires are larger and more resistant to control because of hotter, drier weather. There is high need for strategic fuels management to help reduce risk to communities and important infrastructure. Additionally, climate change affects ecosystem services and the benefits of trees and forests to communities. Surface air temperature and precipitation as well as wind and cloud cover, which in turn interact with biophysical factors including snow and ice, invasive species, and insects and disease, drive climate in the coastal forests of Alaska. Forest insect outbreaks are also connected to increasing temperatures.

Goals

1. Protect forest resources from economically and ecologically damaging insect outbreaks and disease through active forest management and silvicultural treatments.
2. Enhance forest resilience to climate change by managing for changing conditions, sustaining ecosystem health, and preparing for climate-related disturbances.
3. Apply adaptive management and, where appropriate, seek and apply TEK, to drive sound and responsive forest management.”

CIV encourages DFFP to develop management guidelines in furtherance of this management policy and identified goals. Where appropriate and applicable, CIV recommends considering adoption of provisions in Tanana Valley State Forest RMP and the 2020 Alaska State Forest Action Plan.¹⁶

Climate Change should be listed in resource management policies, in the section titled “other guidelines affecting” Fish and Wildlife Habitat, Forest Timber Resources, Forest Protection, Recreation, and Water Quality, Quantity, and Riparian Areas.

c. RMP Chapter 3

i. 3-9 Subunit 1b Timber Harvest

Harvest activities proposed in this subunit will be presented for discussion at an Alaska Chilkat Bald Eagle Preserve Council meeting prior to contract execution “and will comply with consultation obligations under AS 41.15.310”.

ii. 3-11 Mitigation of Impacts to Goat Habitat in the Kelsall Valley

Agency collaboration during harvest project planning with ADFG “along with other parties with rights to consultation under AS 41.15.310 and AS 41.15.325” will direct the development of Forest Land Use Plans which describe the methods for achieving the intended protection of goat habitat during timber harvest design.

iii. 3-32/Subunit 4b

CIV reiterates its recommendation in part 2f of this comment to reclassify Subunit 4b (Chilkat Ridge) from “Forest” to “Fish and Wildlife Habitat” and appropriately redraft goals, management guidelines, and management intent based on the resource values present within this subunit. CIV retains its right to propose reclassification of this land unit pursuant to 11 AAC 55.270.

d. RMP Chapter 4

i. 4-5/6: Five Year Timber Sale Schedule

The DFFP shall coordinate development of the Schedule(s) with other divisions and departments of the State contributing to resource management decisions in the HSFRMA“, including the division of parks,

¹⁶ <https://forestry.alaska.gov/2020ForestActionPlan.htm>

the Department of Fish and Game, including each local fish and game advisory committee with jurisdiction in the area, and the Alaska Chilkat Bald Eagle Preserve Advisory Council, in accordance with AS 41.15.310, and any parties exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325”. The Schedule will be updated biennially.

ii. 4-8/9 Future Research

DFFP studies related to forest management may include the following:

Collaborative studies with other state and federal agencies “, local governments, and any parties exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325” on forest health, ...

iii. 4-9: Fish and Wildlife Research

The Alaska Department of Fish and Game has completed research projects on mountain goats and their habitat, fish species habitat and extents, moose populations and their habitat, brown bears and their habitat, and is continuing to collect information on important fish and game present in the HSRMA and their habitats. The DFFP cooperates and if possible, collaborates with ADFG “, local fish and game advisory committees, the Alaska Chilkat Bald Eagle Preserve Advisory Council, and any parties exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325” in support of research efforts on these resources in the Forest.

e. Appendix A

i. Adaptive management

CIV recommends adoption of the definition applied in the Tanana Valley Forest Plan (2025):

“Adaptive management: A natural resource management framework that emphasizes simultaneously managing and learning about natural resources. Learning in adaptive management is accomplished through monitoring and awareness in the practice of management itself, with adjustments to strategy as more information is gathered. Often, this framework is presented as a cyclical process, with distinct phases of identifying stakeholders, goals, management alternatives, and monitoring practices; followed by implementation, monitoring, and assessment. The insights developed during monitoring and assessment of a practice are then used to refine or adjust the planning stages in future decision-making (Williams, 2011).”

ii. Traditional Ecological Knowledge (TEK or TK)

CIV recommends adoption of the definition applied in the Gravel to Gravel Memorandum of Understanding:

“Traditional Ecological Knowledge (TEK or TK): a living body of knowledge which pertains to explaining and understanding the universe and living and acting within it. It is acquired and utilized by indigenous communities and individuals in and through long-term sociocultural, spiritual, and environmental engagement. TK is part of the broader knowledge system of indigenous communities, is transmitted intergenerationally, is practically and widely applicable, and integrates personal experience with oral traditions. It provides perspectives applicable to an array of human and nonhuman phenomena. It is deeply rooted in history, time, and place, while also being rich, adaptable, and dynamic, all of which keep it relevant and useful in contemporary life. This knowledge is part of, and used in, everyday life, and is inextricably intertwined with peoples’ identity, cosmology, values, and way of life. Tradition—and TK—does not preclude change, nor does it equal only ‘the past;’ in fact, it inherently entails change.”

Gunalchéesh for your consideration of these comments. We look forward to discussing them,



Kimberley A. Strong, President

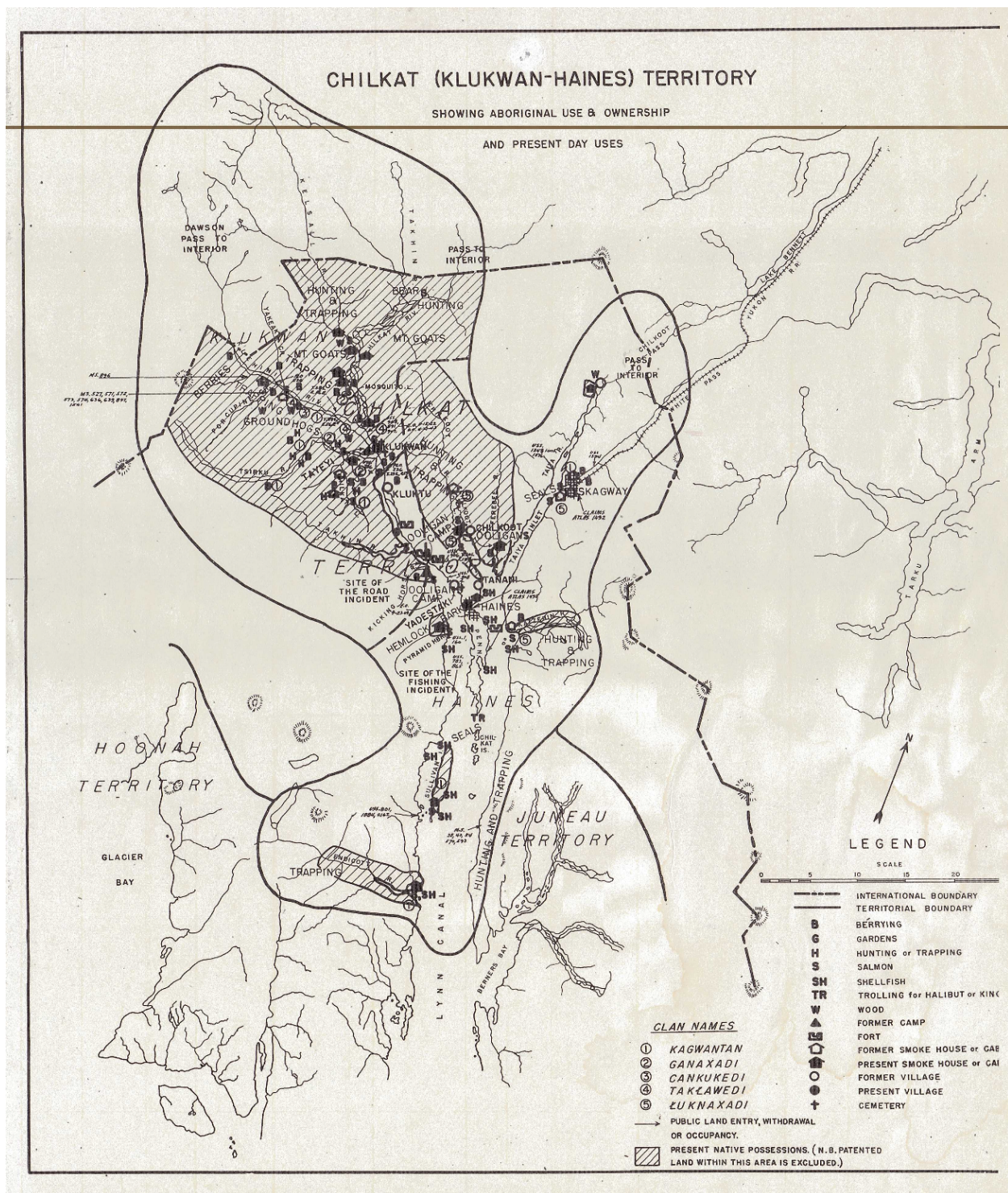


Figure 1. Map created by testimonies of over a dozen Jilkáat Elders; later formally published in *Haa Aaní: Tlingit and Haida Land Rights and Use*.¹⁷

¹⁷ Goldschmidt, W. R., & Haas, T. H. (1946). A Report of the Commissioner of Indian Affairs-Possessory Rights of the Native of Southeastern Alaska. Commissioner of Indian Affairs.

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Dear Forester,

My name is Peter Degen I live in the Chilkat Valley and I depend on the Haines State Forest lands for subsistence to feed my family,, skiing, hunting, berry picking, hiking, boating,, mushroom harvesting, bird watching, and hunting moose.

Everyone who lives here needs the trees to help contain the slopes to prevent catastrophic landslides, filter snowmelt to keep the water clean, and other ecosystem services. Intensified logging in this area or anywhere else in the forest would harm my ability to use and enjoy my public land.

My use of the forest makes me a stakeholder with rights, and under the Alaska Constitution, state managers are required to manage AK lands for the benefit of its people. But the newly proposed plan does not benefit the people of Alaska. Not only does the state lose money on every timber sale, but the proposed changes have numerous additional negative impacts.

As a directly impacted stakeholder, I respectfully request that HSF abandon its plan to harvest every acre of treed forest and instead:

- Respect the input of local communities and make appropriate changes to the proposed plan
- Respect tribal sovereignty and traditional rights
- Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve
- Leave all remaining old growth forest intact
- Allow previously logged areas to recover
- Do not allow export sales
- Allow small operators to harvest house logs and firewood for local use using small, selective logging practices
- Conduct valid scientific studies to determine the needs of this unique, exceptionally biodiverse forest and its dependent species
- Work with the community to prioritize scenic recreation opportunities
- Do not prioritize mining projects on Haines State Forest lands
- Do not permit herbicide and pesticide use; instead, use non-toxic methods to control invasive species
- To pursue carbon offset projects, HSF must start over with a plan that does not violate the tenets of valid carbon credits and instead produces meaningful environmental benefits
- Abandon the Chilkat Ridge and Baby Brown old-growth sales
- Abandon every proposed expansion of logging into Wildlife Habit and Recreation areas

- Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded

Thank you for taking my comments into consideration.

Sincerely,
Pete Degen



From: [george figdor](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
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please consider my comments on the proposed HSF plan update...

i am a 50+ year resident of haines and have used the HSF for both summer and winter recreation activities. i urge you not to make the proposed changes that would supersede the original multi-use land classifications. please retain the original wildlife and recreation categories as they currently exist. there is no reason that has been communicated in the public meetings to justify the changes. this includes any justification based on carbon offsets, since the market for the selling of carbon offsets is pinned to the protection of the most valuable forest—not the less valuable forest that you propose to include now in the timber base.

i attended several of the public meeting in haines and can attest to the fact that there little, if any support for your proposed changes in haines or klukwan. but there was a considerable amount of opposition. from the staff responses at the meetings it was suggested that the main support for the HSF changes was coming from industry (and outside of haines) and not from the community.

if you adopt these changes you will be doing so, not in the public interest, but for the benefit of industry lobbyists. shame on you if you do this.

george figdor

From: [Teresa Hura](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Attn: Forest Planner
Date: Friday, June 5, 2026 4:06:07 PM

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Dear Forester,

My name is Teresa Hura and I live in Haines and own property with a cabin on Chilkat Lake. Since we use the area in the Chilkat Valley for subsistence and recreation, I am opposed to any major logging in this area. Or mining for that matter. These uses would negatively affect the fish habitat and the environment for the residents of the valley and the other wildlife in the area. Please abandon the Chilkat Ridge and Baby Brown old-growth sales. Please honor the Eagle Preserve tenets and the residents of Haines and Klukwan to form a plan that produces meaningful environmental benefits.

Thank you for taking my comments into consideration.

Teresa Hura

Sent from my iPad

From: [ben kirkpatrick](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: HSF Plan Amendment Comments
Date: Friday, June 5, 2026 12:57:39 PM
Attachments: [ADF&G HSF Logging Comments 2002 draft.pdf](#)
[HSF Plan comments 62026.pdf](#)

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Please include these for review. Thank you. ben

June 5, 2026

To Alaska Division of Forestry and Fire Protection:

Haines State Forest Management Plan Amendment

Over 20 years ago ADF&G reviewed the draft of the current HSF Management Plan and submitted comments, attached. The primary areas of concern then were the Chilkat Ridge, the Kelsall and Ferebee Rivers, those concerns remain. What has changed in that time? There have been no large-scale commercial timber harvests completed and many of the productive Chilkat River salmon runs have continued to struggle. And now DFFP wants to include all the land it manages into the timber base.

The lack of timber harvests is not because DFFP did not try. Haines' location at the northern end of SE Alaska means our trees are of lesser quality than in the southern reaches of our region. As well as being that much further from market. I'm confident there is an interesting reason the Haines area was selected by the State shortly after statehood, prior to HSF formation, but it does not seem to be for its outstanding timber resources, compared to many other areas in SE Alaska.

Numerous factors have contributed to the downward trend in salmon productivity, but habitat degradation is a prime concern. While there is no definitive proof, clearcut logging occurred in the Kelsall and Chilkoot drainages in the 1980s and 1990s was followed by significant downward trends in salmon productivity. Chinook salmon in the Kelsall and sockeye salmon in the Chilkoot. These runs recovered somewhat in the subsequent years but there is a notable correlation.

There have been numerous other factors related to declining salmon numbers such as: Haines Highway reconstruction impacts to rearing salmon habitat, NSRAA meddling with wild stock chum runs in the Chilkat drainage, as well as potential over harvesting at times and interceptive fisheries within SE Alaska and the Gulf of Alaska. The Chilkat Valley is also a dynamic place with glacial rebound, rockslides, earthquakes and the overall nemesis of climate change impacting salmon habitat as well as the homes we live in.

This is all to say that HSF 'planning' policy is not the only degrading impact on local fish habitat. But the fact remains there is high value fish habitat surrounded by mostly low to medium grade timber stands. It is time to acknowledge the dream of turning the Chilkat valley into a large timber export area was ill conceived from the start. Only by compromising fish habitat, recreation, tourism and subsistence values can even a small and short-lived commercial export timber harvest be supported.

A new approach is needed for management of the HSF. The current proposal is that but based on the fantasy that the limited timber resources in Chilkat Valley can be exploited without severely impacting the many other resources provided by the HSF. At the very least this Plan

should be delayed until a new governor is hired and hopefully makes a realistic assessment of the values of the HSF, which appears to not be possible by the current administration and staff.

While the current Management Plan is dated, flawed and poorly enforced; it was an honest attempt to balance the many users and resources of the HSF. This current amendment proposal is not that, it's time to rip it up and start over.

Ben Kirkpatrick
Haines resident

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

Habitat and Restoration Division

TONY KNOWLES, GOVERNOR

P.O. BOX 25526
JUNEAU, AK 99802-5526
PHONE: (907) 465-4105
FAX: (907) 465-4759

MEMORANDUM

TO: Jeff Jahnke
State Forester
Department of Natural Resources
Anchorage

DATE: May xx, 2002

FILE:

FROM: Chip Dennerlein
Director

SUBJECT: Haines State Forest Management Plan

The Department of Fish and Game (ADF&G) has reviewed the Public Review Draft (PRD) of the Haines State Forest (HSF) Management Plan, being proposed by the Department of Natural Resources (DNR). We request you consider these comments as you develop the final draft of this management plan. We understand our comments are late in the process and apologize for this inconvenience.

1. Chilkat Ridge. This area is in Unit 4, Chilkat Lake, management subunit 4b, North Takhin, in the management plan. The land use classification for this subunit is Forest Land. ADF&G does not oppose this classification, but strongly recommends that commercial logging activity be prohibited in this subunit for the life of the management plan that is under review.

To access this unlogged area would require constructing a crossing of the Tsirku or Chilkat Rivers. The proximity of any crossing site to high use eagle and fish habitat would pose risks that are difficult to justify at the current time. This area also provides the back drop to the Chilkat River Critical Habitat Area and to Chilkat Lake, both highly productive areas for both anadromous fish and eagles. Eagles use trees in this area for roosting and road-building activity poses erosion risks.

2. Ferebee Valley. This area is Unit 9, Ferebee River, in the management plan. The land use classification for this unit is Forest Land and Resource Management, which allows timber harvest. ADF&G does not oppose these classifications, but strongly recommends that commercial logging activity be prohibited in this unit for the life of the management plan that is under review.

The PRD acknowledges that it will be difficult to develop a log transfer facility in Taiyasanka Harbor, thus the possibility of timber harvest is low. However, the Ferebee Valley was in the 1997 Division of Forestry 5-Year Timber Harvest Schedule. ADF&G

responded as follows in a memo to the Coastal Forester on April 25, 1997: “The Ferebee Way tract, in the Haines area, is an example of a sale that should be removed from consideration, for several reasons. The Ferebee River watershed is unique in being very close to Haines, less than five miles from the ferry terminal, and still a relatively pristine and isolated area. Due to the confined nature of the watershed, there is limited space for displaced wildlife to find refuge during and after logging operations. Roads and the access they provide would dramatically disrupt the balance of this small system. Taiyasanka Harbor is an enclosed estuarine area and presumably very productive salmonid rearing habitat. This would be a very inappropriate location for a log transfer facility. No inwater transfer or storage of logs should be allowed or fill allowed within tidal areas.” ADF&G concerns for this area remain.

3. Kellsall River. This area is Unit 1, Kellsall River, in the management plan. The land use classification for this unit is Forest Land and Resource Management, which allows timber harvest, except for the small Mosquito Lake unit, which is designated Public Recreation. ADF&G does not oppose these classifications, but strongly recommends that commercial logging activity be prohibited in this unit for the life of the management plan that is under review.

ADF&G has expressed concern about logging activities in the Kellsall River watershed in past comments. During the agency review of Draft 1998 Five-Year Schedule of Timber Sales in the Haines State Forest ADF&G provided the following comments on March 9, 1998:

“Kellsall Highlands: This is a salvage sale of beetle killed and infested spruce in the upper Kellsall drainage. We understand that the Department of Forestry is planning to helicopter log the sale thereby minimizing the need to develop additional roads in the drainage. However, we are concerned about the cumulative impacts of this and other logging activities in the Kellsall/Nataga drainage.

The Kellsall River and its tributary, Nataga Creek, provide important spawning and rearing habitat for Dolly Varden, and chinook, coho, chum and pink salmon. The Kellsall/Nataga River drainage has been specifically documented as providing critical habitat for Chinook salmon. Pahlke *et al.* (1990) found that catch per unit of effort of Chinook salmon fry in the Chilkat River drainage was highest in the lower Kellsall River. Radio telemetry studies conducted in 1991 and 1992 (Johnson *et al.* 1992 and 1993) indicated that 54-73% of the Chinook salmon entering the Chilkat River spawned in the Kellsall/Nataga River drainage. These studies demonstrate the relative importance of the Kellsall/Nataga drainage to Chilkat River Chinook salmon.

The drainage has a long history of logging dating at least back to the 1960's that has continued onto the present. Many of the past logging practices used would not be permitted under current regulations (including 300' buffer strips). The result is that the drainage has already been heavily logged and we may already be seeing negative effects on Chinook salmon in the drainage.

The lower Kellsall River has changed dramatically over the past several years resulting in a loss of habitat. We have observed that the number of logjams, root wads, and other woody debris has decreased substantially in recent years. The importance of these structures in providing refuge

for rearing salmonids and creating habitat diversity is well documented (see Hicks *et al.* 1991). In addition, the lower river delta has become much more channelized with a notable loss in the number of ground water tributaries feeding into the delta. We have observed that these tributaries have been used extensively by spawning chinook and coho salmon. The reason for this habitat loss is not fully understood, however, it is well documented that timber harvest activities tend to simplify fish habitat over time (Hicks *et al.* 1991).

The impact habitat loss on the Chinook salmon population can be inferred from sampling activities for Chinook salmon stock assessment over the past several years on the Kelsall and Tahini Rivers, which are the two major spawning tributaries of the Chilkat River (Johnson *et al.* 1992 and 1993). Since 1994, we have expended equal sampling effort each year between the two tributaries. Over this time, the proportion of adults sampled from the Kelsall drainage declined from an average of 70% in 1994 and 1995 (Ericksen 1995 and 1996) to 55% in 1996 and 1997 (Ericksen 1997 and *In prep*). This information suggests that the spawning abundance of Chinook salmon in the Kelsall River is declining relative to the other major spawning tributary in the Chilkat drainage, which has not been logged.

In light of this information, we are concerned about any additional timber harvest in the drainage and this sale in particular. The Kelsall Highlands sale is expected to yield 5,000 MBF of timber covering an area of 1,500 acres. While this proposed sale is large, it will likely be harvested when the Thunder Creek sale is logged. This has already been sold and is expected to yield nearly 4,000 MBF of timber. These two timber sales are located on steep slopes of opposing banks of the Kelsall River. While a 500-foot buffer has been left along the Thunder Creek sale and likely a 300-foot buffer along the Highlands sale, the steep slopes reduce the effectiveness of these buffers.

In conclusion, because:

1. The Kelsall/Nataga drainage has already been logged heavily;
2. The Kelsall/Nataga drainage provides important spawning and rearing habitat to anadromous fish in general and chinook salmon in particular;
3. Chinook salmon spawning and rearing habitat in the drainage has been reduced in recent years, and;
4. The number of spawning chinook salmon in the Kelsall River appears to have declined relative to other spawning tributaries in the Chilkat River drainage in recent years,

We urge the Division of Forestry to consider a moratorium on future timber harvest activities in the Kelsall/Nataga drainage. We request an interdisciplinary team meeting to review all pertinent data relating to the concerns that we have raised. We would like to see appropriate staff members from DNR and ADF&G invited to this meeting as well as hydrology experts from the USDA Forest Sciences Lab.” This interdisciplinary team was never convened.

An additional concern is the lack of a budget provided to DNR to maintain the existing roads in the HSF. Maintenance is conducted as part of future logging contracts, which have not been forthcoming recently because of poor economic conditions. Roads are often the single largest adverse impact to fishery resource associated with timber harvest operations. There is

a history of poor road maintenance and landslides associated with timber harvest operations in the Kelsall River drainage.

Thank you for the opportunity to comment on this permit renewal letter.

cc: Bill Hanson, ADF&G, Douglas*
Staff, ADF&G, Douglas*
Staff, ADF&G, Haines*
Roy Josephson, DNR, Haines*
Bruce Phelps, DNR, Anchorage*
Bill Zack, DNR, Haines*

* = email distribution

From: [Jessica Plachta](#)
To: [Douse, Jeremy A \(DNR\); DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Cc: [Palmieri, Greg J \(DNR\); Kimberley Strong; Brian Willard; Tom Morphet; senator.Jesse.Kiehl@akleg.gov; Representative.Andi.Story@akleg.gov](#)
Subject: re: Haines State Forest Resource Management Plan draft amendment -- public comment from Lynn Canal Conservation
Date: Friday, June 5, 2026 3:56:22 PM
Attachments: [2026 HSEFMA Comments LCC.pdf](#)

You don't often get email from jessica@lynncanalconservation.org. [Learn why this is important](#)

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Dear State Forester Douse,

Please accept these timely submitted comments from Lynn Canal Conservation regarding the Haines State Forest Management Plan draft amendment.

Thank you,

Jessica

--

Jessica Plachta

Executive Director

Lynn Canal Conservation

Office: 907-766-2295

Pronouns: she/her

Jilkáat and Jilkoot Aaní, land of Chilkat & Chilkoot people



Lynn Canal Conservation

P.O. Box 964

Haines, AK 99827

907-766-2295

lynncanalconservation.org

Comments on the 2026 Draft HSFRMA Management Plan Amendment

June 5, 2026

Dear State Forester Douse, Planner Preston, and Forester Palmieri,

Lynn Canal Conservation (LCC) is a 50-year grassroots, member-based organization with more than 600 local members. LCC members utilize Haines State Forest (HSF) lands to hunt, fish, gather subsistence foods, collect firewood, recreate, take spiritual solace, raise their families, and conduct their businesses. LCC was instrumental in the codesignation of the HSF and the Alaska Chilkat Bald Eagle Preserve (Preserve).

Introduction

The Alaska Department of Forestry and Fire Protection (DFFP) released a draft amended Management Plan for the HSF Resource Management Area on April 10, 2026.¹ The process of amending the HSF Management Plan began in May 2024. The revision process followed the creation of the Carbon Offset Program,² which allowed the Department of Natural Resources (DNR) Commissioner to lease state land to private third parties to undertake carbon offset projects or other projects designed to mitigate greenhouse gases.³ In late 2024, DFFP said it “received additional direction . . . to include the long-standing directive to support Alaska’s timber industry by updating policy that had previously prohibited timber harvest on Habitat and Recreation classified units of the HSF Resource Management Area (HSFRMA).”⁴

The draft HSFRMA plan (plan) demonstrates a clear departure from the intent of the founding legislation by sacrificing multiple uses by prioritizing timber harvester above all other uses, removing protections from thousands of acres, and ignoring the input and objections of local stakeholders in the design of the plan. LCC is profoundly concerned about a number of substantive and procedural defects with this draft plan.

¹ <https://forestry.alaska.gov/HSFamendment/> .

² AS § 38.05.081.

³ AS § 38.05.081(a); DNR Carbon Offset Program by Trevor Fulton, August 19, 2025.

⁴ 2026 01 13 - HSFRMA scoping - CBEP Follow-Up, p. 1.

Background

Creation of the Eagle Preserve and HSF

In February 1982, legislation was introduced in the Alaska House and Senate to create a bald eagle preserve in the Chilkat Valley.⁵ SB 796 was introduced by Senator Bill Ray, and originally created only the CBEP, though Senator Ray introduced a revised version of the bill two weeks later that also included the HSF Resource Management Area.⁶ SB 796 subsumed the house bill and eventually passed, creating both the Eagle Preserve and the HSF.

SB 796 was a compromise between conservation and logging interests.⁷ The relevant statutory text specifies that the “primary purpose” of the Preserve “is to protect and perpetuate the Chilkat bald eagles and their essential habitats within the Alaska Chilkat Bald Eagle Preserve in recognition of their statewide, nationally, and internationally significant values in perpetuity.”⁸ The statute further specifies that the Preserve is intended to “protect and sustain the natural salmon spawning and rearing areas of the Chilkat River and Chilkoot River Systems within the preserve in perpetuity,” provide opportunities for research, protect water quality and quantity “to the maximum extent practicable,” provide for “other public uses,” and “provide an opportunity for the continued traditional and natural resource base lifestyle” of the people living in the region.⁹

The text also makes clear that the Preserve and HSF serve complementary purposes. It says the two areas together “represent a proper balance between” the reservation of State lands and waters “for eagle preserve purposes” and those State lands and waters “more appropriate for multiple use.”¹⁰

In order to manage according to its mandate, the HSF should have clear, consistent, current guiding documents and up-to-date scientific studies backing its management decisions. Results of HSF management actions should clearly show over time that, for example, HSF actions do not result in “*significant impairment of the productivity of the land and water with respect to renewable resources.*”¹¹

1985 and 2002 Management Plans

The DNR completed an initial management plan for the HSF in 1985. Contemporary reporting

⁵ AS § 41.21.610(c).

⁶ Alaska Senate Journal 1982 Jan 12th Leg Vol 1, March 4, 1982; Compare original title, “An Act establishing the Alaska Chilkat Bald Eagle Preserve; and providing for an effective date” with revised title, “An Act providing for the management of state-owned land in the Haines area, establishing the Alaska Chilkat Bald Eagle Preserve and the Haines State Forest Resources Management Area.”

⁷ *Legislature Okays Eagle Preserve*, Daily Sitka Sentinel, April 26 1982.

⁸ AK ST § 41.21.610.

⁹ *Id.*

¹⁰ AS § 41.21.610(c).

¹¹ FRPA Sec. 41.17.060. Regulatory and administrative standards. (c))(5)

suggests that the 1985 Plan banned the use of pesticides and herbicides in the HSF [a provision that appears to be reversed by the new draft plan] and disallowed logging within 300 feet of salmon streams.¹² The then-commissioner of the DNR, Esther Wunnicke, told the Associated Press that the Management Plan was meant to satisfy both environmentalists and logging interests, and was focused primarily on multiple use management.

The plan withdrew some areas of the timber base but set aside 9 million board feet a year for commercial logging, which the DNR believed was sufficient to stabilize the already-depressed timber industry in Haines.¹³ Areas closed to timber harvest included the Chilkoot Valley, the west side of Chilkat Inlet, and the Taklin River-Kicking Horse region, while areas north of the Taklin River were subject to special conditions to protect moose populations, and harvest in the Kellsall River area was to be managed alongside the Department of Fish and Game to minimize impacts on goats and goat habitat.

Identified issues in the 2026 draft plan

1. More than double the logging

The current management plan allows for commercial timber harvest on about 42,000 acres. The new plan more than doubles that acreage by adding another 47,000 acres to the loggable area. Overall, the draft plan opens 7,608 acres of public recreation lands and 13,472 acres of wildlife habitat to commercial timber extraction. This expansion in available forest for commercial timber has translated to a much higher Annual Allowable Cut, more than doubling from 5.88 million board feet to 14.77 million board feet.

The draft plan newly allows commercial timber or timber sales in almost every subunit, including at least 10 units where timber production was previously prohibited. These subunits include Mosquito Lake, Tsirku West, Herman and Walker Lakes, West Chilkat Lake, Chilkat Recreation, Taklin/Kicking Horse, West Chilkat Inlet, Davidson Glacier/Lake, Upper Chilkoot River, and Chilkoot Lake.

These subunits had previous designations of public recreation or wildlife habitat. Unlike the 2002 Management Plan, the revised plan does not include any areas set aside as “Areas not Available for State Timber Harvest.”¹⁴

2. Procedural defects

¹² *State Ends Work on Haines Forest Plans*, Daily Sitka Sentinel, July 8, 1985.

¹³ *State Ends Work on Haines Forest Plans*, Daily Sitka Sentinel, July 8, 1985.

¹⁴ 2026 04 09-HSFRMA-Public Review Draft, p. 44; compare, e.g., 2002 Haines State Forest Management Plan at 2-18 (identifying “Land Not Available for Timber Harvest”).

As a division of the DNR, the HSF is subject to a procedural obligation to “consult with the division of parks, the Department of Fish and Game, including each local fish and game advisory committee with jurisdiction in the area, and the Alaska Chilkat Bald Eagle Preserve Advisory Council to promote effective, efficient, and coordinated administration” of the HSF and the Preserve, in keeping with the “the values for which each is established.”¹⁵ However, as detailed by the Upper Lynn Canal Fish and Game Advisory Council and reported by the Chilkat Valley News,¹⁶ HSF appears to have treated its obligations as boxes to check rather than legitimate consultation duties. HSF drafted the plan for *two years* before sharing even broad strokes with the community, and despite overwhelming opposition to its proposal to increase industrial logging, HSF has so far refused to budge.

When an agency is disposing of public resources through a multi-step process such as the timber sale program, *“consideration of cumulative impacts is constitutionally required throughout all the phases of a project.”*¹⁷ An agency violates *“its constitutional duty to take a continuing hard look and new information and changing circumstances”* when it fails to *“consider cumulative impacts and provide to the public timely and meaningful notice of its assessment of the cumulative impacts”* as a project evolves during the planning process.

In summary documents, DFFP framed scoping meetings as intended to capture local perspectives and provide the opportunity to contribute considerations and recommendations.¹⁸ The majority of public comments opposed large scale timber harvest, removal of protections, and increasing AAC and supported prioritizing wildlife habitat, recreation, and scenic values instead.

3. Conflict with AK State Constitution

Article VIII of the Alaska State Constitution includes several provisions specific to management of natural resources within the State. Section 1 of Article VIII establishes a state policy to “encourage the . . . development of its resources by making them available for maximum use consistent with the public interest.” Section 2 says the State should ensure that the “utilization, development, and conservation of all natural resources belonging to the state” is for “maximum benefit of its people.” And section 4 directs that “forests . . . shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.” Clearly, the Alaska State Constitution suggests a thoughtful approach to natural resources, one that includes conservation values.

Industrial timber harvesting allowed in the HSF is inconsistent with the public interest, even if the DNR does not plan to authorize harvests in all the subunits. Overall, the draft plan opens

¹⁵ AS § 41.15.310; see also AS § 41.21.620(b)

¹⁶ [Advisory Committee Wants Better Consultation on New Plan for Haines State Forest](#), Rashah McChesney, Chilkat Valley News, January 15, 2026.

¹⁷ 2022 FYFMS, page 12

¹⁸ 2026 01 14 - HSFMA scoping - Borough Discussion, p. 1-2.

7,608 acres of public recreation lands and 13,472 acres of wildlife habitat to commercial timber (Compare Table 2-1 in 2002 and 2026 plans).¹⁹ This expansion in available forest for commercial timber has translated to a much higher annual allowable cut, more than doubling from 5.88 million board feet to 14.77 million board feet.²⁰ This is also partly explained by the DNR's decision to increase the acreage of available timber in certain units; for example, Unit 3 went from 11,440 to 14,070 acres of operable forest land.²¹ The draft plan also includes cottonwood in the annual allowable cut calculation; cottonwood was not included in the 2002 Plan due to low market demand.²² The draft plan states that "[t]he 2018 second growth inventory project included cottonwood regeneration and considers this species as a component of the commercial Forest," but makes no mention of increased market demand.²³

Including cottonwood in the annual allowable cut calculation inflates the appearance of the timber base by adding a species for which there's no demonstrable demand. As noted above, the new proposed plan increasing the available forest for commercial timber and inflating the inventory has translated to a much higher Annual Allowable Cut, more than doubling from 5.88 million board feet to 14.77 million board feet (MMBF).

4. Failure to account for HSF impact on its protected twin, the Chilkat Bald Eagle Preserve

DNR remains subject to a procedural obligation to "consult with the division of parks, the Department of Fish and Game, including each local fish and game advisory committee with jurisdiction in the area, and the Alaska Chilkat Bald Eagle Preserve Advisory Council to promote effective, efficient, and coordinated administration" of the HSF and the Preserve, in keeping with the "the values for which each is established."²⁴ This provision conveys that the Preserve and HSF cannot be managed in complete isolation. Some level of conversation and coordination is required.

The DNR has previously identified appropriate uses for specific subunits in the HSF with reference to their proximity to the Preserve. In the 2002 management plan, for example, the DNR explained that the management of Subunit 8b (Chilkoot Lake)—was to be "similar" to management of "adjoining lands within the [Preserve]" and would "focus on the maintenance" of "these resources"—referring to Preserve resources.²⁵ The 2026 draft largely omits discussion of the Preserve, relegating its minimal discussion to the introduction of the section

¹⁹ 2026 04 09-HSFRMA-Public Review Draft p. 2-20.

²⁰ 2026 04 09-HSFRMA-Public Review Draft p. 2-9. Annual allowable cut calculations are derived from the Forest Inventory, which was done in 1994 and 2025 most recently.

²¹ 2002 HSF Forest Management Plan p. 3-19; 2026 04 09-HSFRMA-Public Review Draft p. 2-20.

²² 2002 HSF Forest Management Plan p. 2-6.

²³ Haines Forest Inventory 2025 p. 8.

²⁴ AS § 41.15.310; see also AS § 41.21.620(b)

²⁵ 2002 HSF Forest Management Plan p. 3-61.

discussing Unit 8. This change in management approach represents a complete failure by DNR to acknowledge the interconnection between the two management areas, endangering the values for which both were established.

5. Carbon Offset program lacks legitimacy

A carbon offset project is one that is supposed to prevent emissions (or sequester carbon) in one place to cancel out emissions released somewhere else. However, the carbon offset projects DNR is proposing for the HSF could do little to reduce net emissions, while potentially increasing damage to the forest (ironically increasing emissions.) The global carbon market has rules and relies on verification of the validity of carbon offset projects. Due to widespread loss of trust in the program, the value of the carbon market has shrunk by roughly two-thirds since 2021.

At a public meeting, a DNR forest planner explained that the department “decided that the best way to create opportunity for carbon offset projects in the state forest is to use language that allows for timber harvest on all classification types of land.” In other words, to unlock carbon deals, DNR first needs to make logging legal everywhere. But, if those areas were never seriously at risk of being logged in the first place, then promising not to log them doesn’t actually create a net emissions reduction. As such, HSF has admitted to the world that its carbon offset projects are illegitimate, rendering them worthless before they even begin, and unlikely to stand up to third party accreditors. This leaves logging as the default management activity in the HSF.

The statute governing management of the HSF says that “the management plan must identify the land appropriate for the carbon offset project.”²⁶ But the draft plan simply states that “[a]ll land use designations in the [HSF] are identified as available for carbon offset projects.”²⁷ This vague directive is not supported by any evidence about the viability, feasibility, or benefit of carbon offset projects in any specific area of the forest. There is also no discussion of how carbon offset projects would manifest depending on the land use designation. This would be particularly important in the subunits where commercial timber is newly allowed.

If HSF were to produce a *legitimate* carbon offset plan that refrains from artificially inflating the timber base, retains old growth and protects intact forest, such a plan could be a valuable contributor to state coffers that could gain widespread public support while preserving wildlife habitat, recreation, and scenic values.

6. HSF is failing to properly manage for Multiple Use

DNR is required to manage for multiple uses in the HSF, and should consider conservation, economic benefits, cumulative effects, recreational value, and biological, cultural, and aesthetic benefits.²⁸ But it is not clear how the proposed carbon offset projects are going to interact with

²⁶ AS § 41.15.315.

²⁷ 2026 04 09-HSFRMA-Public Review Draft p. 2-7.

²⁸ AS § 41.15.300 (a).

commercial timber uses, recreation uses, and wildlife habitat uses. Similarly, allowing logging in every corner of the forest is inconsistent with the public interest and the requirement to balance and provide for multiple beneficial uses.

7. Inflated Inventory supporting inflated AAC and Rotation Period

“(T)he management plan should be based on a current operational level inventory completed within the last 10 years and revised as future inventory information becomes available to the department.”²⁹ The HSF must use the best available science and “all applicable data”³⁰ to arrive at timber volume estimates and prepare its timber sales.

The proposed new plan more than doubles the amount of forested acres on the chopping block. The HSF is required to base its proposed timber harvest on an operational level inventory of forest resources. But HSF used imperfect computer software models to predict a greater merchantable forest volume in 120 years than the original forest it's proposing to be cut down. This makes no sense. Chilkat Valley forests are not highly productive temperate rainforests, they are slow-growing sub-boreal snow forests adapted to this harsh, transitional climate. Unlike a true temperate rainforest, this area sees deep snow and cold temperatures that prevent conifer growth for half of every year. And young trees are not regrowing as projected. Yet, HSF uses tree regrowth calculations that project regrowth rates as if this were a temperate rainforest like the Tongass, ignoring the challenges faced by young trees in the Chilkat. This is significant because HSF bases its Annual Allowable Cut and 120-year Rotation Period on regrowth calculations. There are 60-year-old clearcuts in the upper valley that are choked with alder and Devil's Club and are not likely to become high-volume merchantable timber in the next 60 years. **Please see Appendix A** for a description of the unique climatic conditions in the Chilkat and how local conditions differ from Tongass National Forest tree production capacity.

The state and federal governments contracted Terra Verde Consulting in 2020 to conduct a detailed evaluation of Young Growth resources in the Tongass National Forest (TNF).³¹ Terre Verde found that *“In past inventory and planning efforts, stand information has been summarized based on initial post-harvest stocking surveys and “grown” over time with modeled size-density relationships. But TNF silviculturists have identified that these data are insufficient to represent the array of stand structures arising from complex topography, productivity, and composition in Southeast Alaska. The TNF needed an improved, spatially explicit data product that summarizes stand species composition, height, and horizontal cover to more accurately and precisely assess the scope and variability of young growth timber in Southeast Alaska.”*

²⁹ AS 41.15.320 (b)(a)

³⁰ AS 41.17.060(b)(1)

³¹ [Analysis of Young Growth Timber Inventory Information and Volume Flow Over Time Reporting on the Tongass National Forest](#), Terra Verde Consulting, July 2, 2020, prepared for the Tongass National Forest and State of Alaska through the Challenge Cost Share Agreement.

The contractor “used a combination of aerial and satellite imagery, LiDAR, current forest inventory plots, and past stand survey information from overlaid stand boundary polygons” to develop what they said “should be considered a vegetation map” in order to “completely capture the YG forest lands on the TNF.”

Then the company performed a “Net Downs” analysis, removing all known inoperable areas from the operable acreage, excluding roads and stream buffers and other operational constraints. This analysis produced a detailed inventory, after which each stand in the inventory was then “grown forward for 100 years” in order to identify in “which year the trees in each stand grew tall enough to exceed the 2 Log Rule.”³² During the analysis it was determined that hundreds of stands would not meet the 2 log rule, even after 100 years, perhaps due to poor site regrowth conditions and/or hardwood tree succession. Even after this extensive analysis using what appears to be a comprehensive methodology, the contractor warned the state and feds that the study results leave “overarching questions about the quality and timing of the YG timber supply.” Most importantly for the HSF are the following concerns excerpted from the Terra Verde report:

- *The Northern Southeast sample is very weak and cannot be reliably used for planning. Because species mix is so different north of Prince of Wales (where the sample is concentrated) it is not advisable to use POW sample plot data to generate estimates on the northern TNF. If timber sale planning on Northern Ranger Districts is a goal, there will need to be additional sample plots installed.*
- *Sufficient work has been done both inside the analysis contained in this report and work completed by TNF staff to suggest the net down of YG acres is between 20%- 60% with an average net down of 30%-40%. That is an immense reduction between the YG acres on the landscape and those available for future management and timber harvest.*
- *A missing [component] in the understanding of Tongass YG is a true sustained yield analysis. Inventory information should be combined with the acre net down restriction to make this happen.*

The methodology used and described by HSF in its production of its 2020 Inventory³³ was difficult to interpret and left much to the imagination. However, it seems clear that the concerns raised by Terra Verde for more southerly forests are yet more stark and urgent for the HSF due to its poor regrowth conditions and uniquely harsh climate. HSF should carefully consider and clearly demonstrate whether and how its regrowth calculations compare to its southerly neighboring forests, which already struggle to restock after logging. HSF should use the best available science to calculate regrowth, including thorough fieldwork and site-specific data for all microclimates in the HSF. Net downs analysis should exclude roads and stream buffers and make other appropriate provisions for healthy wildlife habitat. Any forest regrowth simulator

³² 2 Log Rule, “Half the volume in stands must come from trees with at least 2 logs”. Terra Verde 2020

³³ Timber Inventory of State Forest Lands in the Haines Area 2020, page 2, “Methods”

computer programs should use valid, site-specific, climatically-adjusted regrowth data, verified in the field over time, to attempt to develop regrowth projections for the HSF.

HSF has a statutory responsibility to prove that it is using a field-verified, operational level inventory, not just a computer simulation to support its AAC and rotation period. Without HSF conducting this work and sharing it with the public, local stakeholders are left to use their own eyes to observe that the forest is just not growing back as HSF claims it is.

8. AAC and Sustained yield

Alaska Statute requires that its agencies provide a “*sustained yield*” of resources, including “*fish, wildlife, and timber*” and the State Department of Forestry (DoF) is subject to that requirement on behalf of its people. Sustained yield requires sustainable management. All of these resources are found in HSF-managed forests as well as the Preserve, and all are vulnerable to mismanagement. Arguably, this is why the system of checks and balances involving citizen advisory committees, public comment periods, and the courts, are set up as they are. The requirement for sustained yield doesn’t have an end date, statute specifies that “*forest land shall be administered for the multiple use of the renewable and nonrenewable resources and for the sustained yield of the renewable resources of the land in the manner that best provides for the present needs and preserves the future options of the people of the state.*”³⁴

Alaskans 50, 100, and 200 years from now have the same constitutionally-protected right to the sustained yield of public resources that this generation has. This puts the burden on the state to prove that its management actions concerning “*(f)ish, forests, wildlife, grasslands, and all other replenishable resources*” are sustainable well into the future.³⁵ And one resource is not allowed to be favored to the degradation of another.

*“Allowable cut: The average volume that may be harvested annually from a given forest unit, that will result in the eventual attainment and perpetuation of an approximately normal distribution of age classes, normal stocking, and a sustained yield.”*³⁶

The requirement for “*approximately normal distribution of age classes*” is not satisfied by the clearcut logging and subsequent replanting of clearcut acreage. That process results in an even-aged tree plantation, (if it results in regrown trees of the target species at all). Normal distribution of age classes occurs in natural forest, and in managed forest only when management utilizes carefully- planned, partial-cut forestry that leaves “Mother trees” and other natural components of the forest.³⁷ Allowable cut is also supposed to ensure a relatively steady

³⁴ FRPA Sec. 41.17.060. Regulatory and administrative standards. (c) (1)

³⁵ Article VII, Section 4, Alaska State Constitution: Sustained Yield of Natural Resources

³⁶ 1994 HSF Inventory, page 1

³⁷ Simard, 2021

state of marketable timber. In fact, the HSF AAC has been adjusted dramatically over the decades to account for declining stocks. The 1965 HSF inventory contained calculations for 3 different AAC formulas, with results varying from “only” 32 million to 50 million board feet (MMBF).³⁸ DNR reanalyzed the 1965 Inventory in 1973 and determined that 19.5 MMBF was reasonable, based on a 100-year rotation period. By the 1994 inventory, the AAC had been downgraded to 9.3 MMBF with a 120-year rotation period.³⁹ The 2020 HSF Inventory inexplicably shifts the rotation period to 100 years (without scientific explanation or public process) and upgrades the AAC to 11.44 MMBF, but the current FYFMS used the again-re-calculated AAC of 5.88 MMBF. And now the draft HSF plan overdoubles the AAC to 14.77 MMBF. The erratic and diminishing AAC, plus the addition of thousands of new acres into the timber base are *de facto* admissions that the state is unable to provide sustained yield using its current management practices. They are merely dividing a pie that was formerly large, productive, and valuable, into smaller and smaller pieces of continually worsening quality while overseeing the degradation of “(f)ish, forests, wildlife, grasslands, and all other replenishable resources.”

A. Is the state meeting its Constitutional requirement for sustained yield of timber?

To meet this requirement regarding timber, the state must ensure that the forest is regrowing into marketable timber at, or above, the rate at which it has been, or is being, cut. Accurate records, detailed fieldwork, and honest projections based on site-specific conditions are required. Regeneration of clearcut forests must result in renewed marketable timber by the end of the rotation period and other resources must not be sacrificed in the meantime.

B. Is the state meeting its requirement for sustained yield of fish and wildlife?

Traditional ecological knowledge and modern science agree that extractive activities, including clearcut logging, have resulted in reduced health and productivity of fish and wildlife. This is true in the Chilkat Valley as elsewhere in the US and the world. Sustained yield requires sustainable management. But the HSF favors large-scale, unsustainable, clearcut logging as its default prescription. Clearcuts degrade water, biodiversity, and ecological resilience.⁴⁰ Clearcuts exacerbate climate disruption.⁴¹

The State has a duty to make decisions rationally and to explain its decisions. Under AS 41.17.060(b)(1), to the “maximum extent possible” the best available information should be applied to forestry decisions such as this. LCC has been supplying DoF with the best available science for decades, to no apparent effect. Please incorporate by reference LCC’s comments on HSF management plans and timber sales to present. See especially Thunder Creek Appeal and Request for Reconsideration of Thunder Creek Appeal, 1996.

The Chilkat River has historically supported some of the largest Chinook, coho, and sockeye salmon stocks in the region. All 3 species have had declining returns in the Chilkat

³⁸ 1965 HSF Inventory, page 14

³⁹ 1994 HSF Inventory, page 13

⁴⁰ Yu, 2019. Jones, 2020, Price, 2020, Thompson, 2009

⁴¹ Weiting, 2019. Pojar, 2019

River system. Because fish and wildlife are dependent on healthy forests, the state must provide for the regrowth of forests, not just timber. While it cannot be demonstrated definitively that Chinook, for example, declines are a direct result of past logging practices, the changes in spawning areas of the Kelsall River are consistent with those changes seen in heavily logged watersheds elsewhere in the Pacific Northwest. See LCC comments on Thunder Creek Sale. An ecological understanding, coupled with a partial-cut strategy, could help the HSF adjust in the right direction.

The HSF contains unique biodiversity and ecological values requiring a dedicated and informed management strategy. A strategy that protects keystone and other mammals and birds would provide some protection for the full range of species that occur in the forest, which are essential for maintaining true forest health. As a transition zone between temperate and boreal forest, many species occur in the Haines State Forest that are not found in the Tongass, and these need to be incorporated into planning. A comprehensive biological survey, i.e., the full spectrum of native flora, fauna, and fungi that exist within the forest boundaries, would be an intelligent foundation on which to build an ecologically-informed management strategy. **Please see Appendix B** for more information.

9. Large-scale commercial logging in the Chilkat is not economical, for loggers or for the state

Taxpayers for Common Sense has produced reports detailing the losing proposition that is subsidized logging. Even in the relatively productive Tongass National Forest, every year, sales have consistently generated less revenue than the US Forest Service spends to administer them, resulting in large net losses for U.S. taxpayers. This 2020 report showed, "Since fiscal year 1980, the USFS has lost approximately \$1.7 billion, or \$44 million per year on average." State forests have even worse economics, not to mention the knock-on degradation to economic engines like fishing and tourism. Haines-based logger Scott Rossman put it simply when describing the difficulties of large-scale logging projects. "Nobody can solve the problem of moving this low grade wood to somewhere they can sell it and have anything left over," Rossman told the Chilkat Valley News. "It's as simple as that."⁴² Forester Greg Palmieri acknowledged that the Haines State Forest is lower quality wood than the southern Southeast forests that fueled much of the state's historical timber harvest. "To the south of us there's larger timber and higher quality grade, and we have a little less average volume per acre," Palmieri said.⁴³ So, if big timber sales in the Haines State Forest are uneconomical, why does the state keep offering them? Why not develop a community forest plan respectful of the changed economic drivers in the area and manage the forest to support fishing, tourism, recreation, and subsistence and traditional uses? We urge the HSF to do just that.

⁴² [State seeks to expand logging in Haines State Forest](#), Will Steinfield, Chilkat Valley News, February 4, 2026.

⁴³ *Id.*

Conclusion and recommendations

The main effect of the new plan appears to be the reclassification of the whole forest and removal of any classifications that restrict or disallow timber harvest. Since the proposed carbon offset program is not valid, this would essentially result in opening the entire HSF to timber harvest. This runs counter to the founding legislation, the will of the public, and consideration of other beneficial uses of the forest.

The need to add thousands of previously inoperable acres into the timber base, plus the erratic and diminishing AAC, along with diminished fish stocks, indicates the HSF's inability to provide sustained yield of forest and wildlife resources. This demonstrates the need for reconsideration of HSF management's guiding philosophy and strategy. Clearly, the agency failed to take a "hard look" at "all factors material and relevant to the public interest" in producing this draft plan.⁴⁴ DNR should consider conservation, economic effects, cumulative effects, recreational value, and biological, cultural, and aesthetic benefits. DNR has not properly considered the relevant factors in its HSFRMA planning process thus far, and we encourage the agency to remedy these fundamental issues prior to publishing its final plan.

We encourage DNR to recognize the HSF for the unique landscape that it is, and to withdraw the draft plan for additional revisions. Please conduct comprehensive biological surveys and initiate meaningful consultations with community groups, Tribes, and other stakeholders. Additionally, please consider the current fishing and tourism-based economy, traditional and subsistence-based lifeways, and ecological needs of the greater Chilkat watershed in future planning efforts. And finally, we urge DNR to recognize that the HSF is not just a poor producer of merchantable timber, it is an irreplaceable biodiversity hotspot and wildlife corridor that will only increase in value as the climate continues to change. Implementing conservative management strategies, potentially including a valid carbon offset plan that preserve ecological functions in this unique landscape, can increase numerous benefits for this and future generations.

Thank you for your consideration of our comments.

Sincerely,



Jessica Plachta
Executive Director
Lynn Canal Conservation

⁴⁴ *Sullivan v. Resisting Env'tl. Destruction on Indigenous Lands (REDOIL)*, 311 P.3d 625 (Alaska 2013).

CC:

Kimberley Strong, Chilkat Indian Village President
Brian Willard, Chilkat Indian Village Tribal Administrator
Harriet Brouillette, Chilkoot Indian Association Tribal Administrator
Haines Borough Mayor
Senator Jesse Kiehl
Representative Andi Story

APPENDIX A

The Differing Forest-growing Climates of Southeast Alaska

Southeast Alaska spans over 400 miles from North to South, and this latitudinal range, combined with other geographic and meteorological factors, results in a range of substantially different forest-growing climates. These differing climates of SEAK can be grouped into 3 distinct forest/climate regions.

Southern and outer-coast SEAK experiences a mild, hypermaritime climate popularly described as Temperate Rainforest. This zone is depicted in light green on the accompanying Köppen climate map, and reaches from SEAK to the west coast of the lower 48 states. This area is characterized by mild temperatures in both summer AND winter, and abundant, year-round precipitation. Even in winter, most precipitation falls as rain at low elevations, and when snowfall does occur, the snow cover generally doesn't persist at low elevations. Because of the temperate climate, temperatures in much of the Spring, Fall, and even Winter seasons are above 40F, or even 50F, which are critical energetic thresholds for growth of Sitka Spruce, and other plants, respectively. These characteristics are generally ideal for growth of conifers native to this region, including Western Redcedar, Sitka Spruce, Western Hemlock, and to some degree Alaska Yellow Cedar. When allowed to grow to their natural lifespans, trees here reach outstanding sizes, including some of the largest and tallest trees in the world.

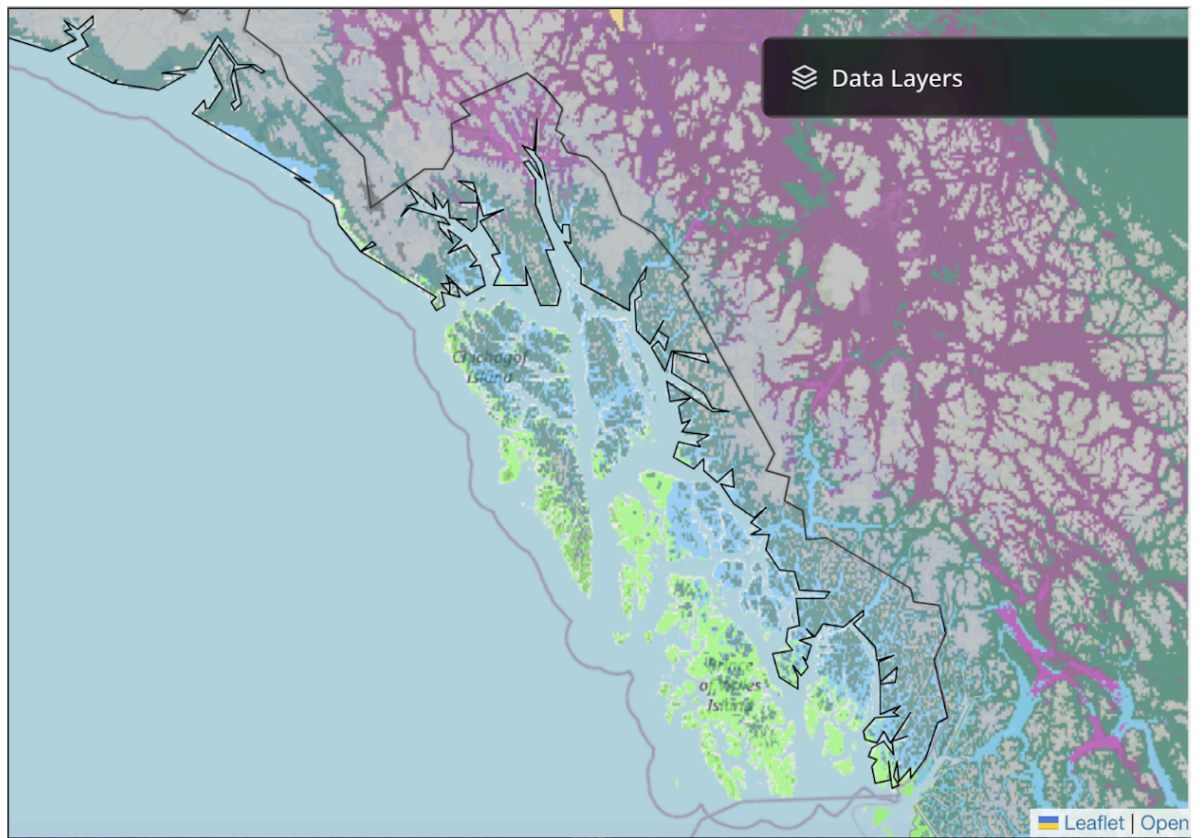
Most of mainland SEAK south of Berner's Bay, and the North/Central and inner islands experience a climate described as Subarctic Rainforest, or Boreal Rainforest. This is shown on the Köppen climate map as either pale blue, or dark green at higher elevations. These areas also receive heavy, year-round precipitation, but with a notably cooler climate resulting in both winter rainfall and snowfall occurring intermittently at low elevations. Snowpack may remain at low elevations for short periods, or sometimes for 1-3 months. These colder conditions are unsuitable for tree species evolved for milder conditions, and as a result Western Redcedar does not occur at all in this area. The Sitka Spruce & Western Hemlock that do occur here don't grow as large or as rapidly as they do in Southern SEAK. Although old-growth forest in this section, after many centuries of growth and development, is still impressive, the trees simply don't grow as fast or as large as they do on islands like Kosciusko or Prince of Wales in southern SEAK.

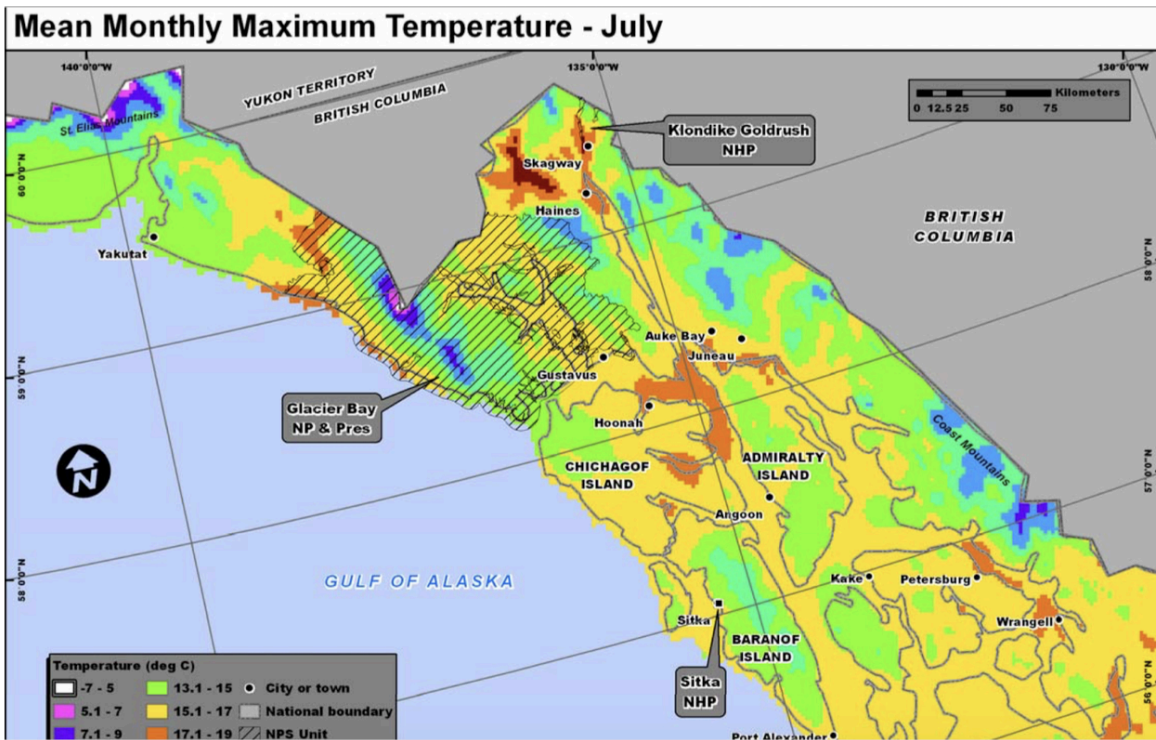
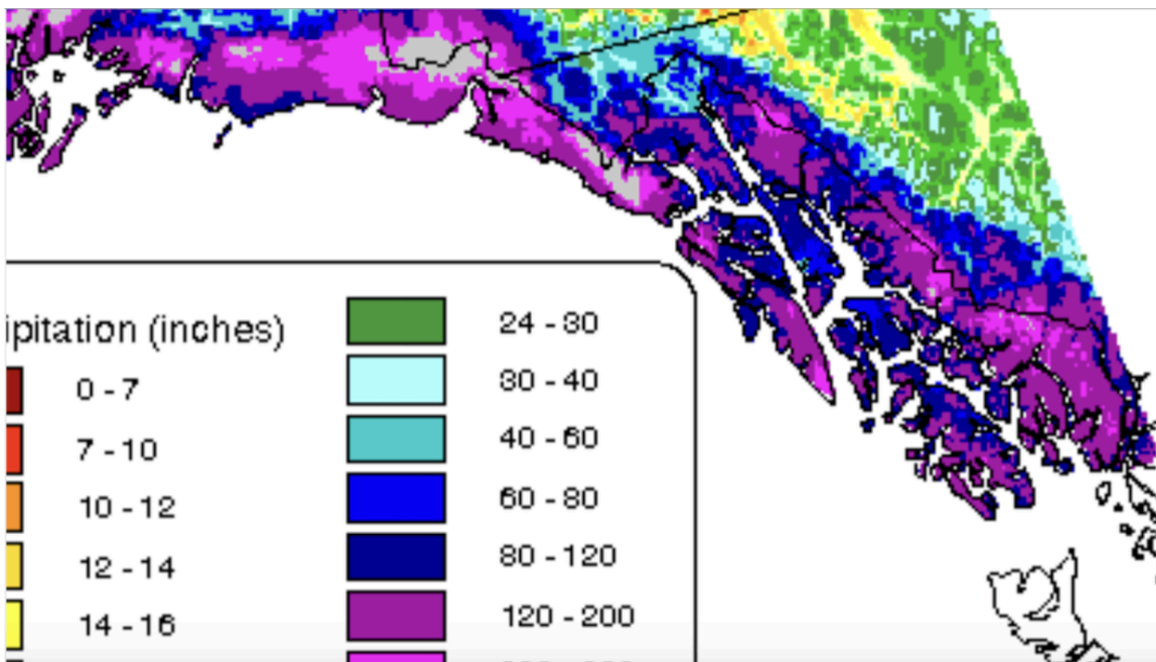
The third, and least recognized or described, climate region of SEAK occurs in the area surrounding the northern Lynn Canal, and especially in the Chilkat Valley. This is where the entirety of the HSF is located. This area experiences a climate known as Dry-summer Continental, with cold winters and warm-to-hot summers, and is depicted in the Köppen map as purple, or (for *hot* summer) light-purple. This climate is dramatically different than the climates in the other sections of SEAK in at least 3 significant ways:

- Because of interactions between local topography and prevailing weather patterns, the northern Lynn Canal, and especially the Chilkat Valley, experiences a significant “rain shadow”. This means that the land itself, in the form of multiple mountain ranges, blocks much of the moisture-laden air coming from the Pacific Ocean. As a result, the Chilkat Valley receives less than 40 inches of precipitation annually (this contrasts with the 80-to-160- plus inches of rain that annually saturate the rest of SEAK). Sitka Spruce and Western Hemlock depend on abundant moisture to thrive, and the comparatively dry conditions in the Chilkat Valley mean that these conifers often grow much more slowly here.
- The dry, warm-to-hot summers of the Chilkat Valley's Continental climate are dramatically different than summers in the Temperate Rainforest of SEAK. In addition to the annual precipitation being lower, as mentioned above, the seasonal timing of precipitation is also different. The Continental climate region of the Northern Lynn Canal is the only part of SEAK that experiences a *dry* summer.

In the case of the Chilkat Valley, where much of the HSF's "operable" forest is located, the summers are classified as both *dry and hot*. For some plants those conditions can suit growth, but for the tree species of coastal Alaska (like Sitka Spruce and Western Hemlock) that are adapted to cool, wet conditions, the Chilkat Valley's comparatively dry and hot summers can actually limit growth. Soils and forest humus in the Chilkat Valley can become extremely dry, and this is the only area in SEAK to regularly experience natural wildfires. Wildfires are actually part of the natural disturbance regime for Chilkat Valley forests, again unlike all other forests in SEAK.

– Having a Continental, rather than a Temperate Rainforest climate, means that in the Chilkat Valley the winters are much colder than elsewhere in SEAK. The colder winters means that the *majority* of winter precipitation arrives as snow rather than rain. And in the middle and upper Chilkat Valley (where most of the HSF "operable" forest is located) that snow remains on the ground as a continuous snowpack for 6-7 months, even at lower elevations. This deep, persistent snowpack is an extreme limitation on tree growth, and utterly disparate from conditions in Southern SEAK. The very long-lasting, persistent snowpack severely reduces the available growing season, and limits seed germination, as well as seedling viability. Additionally, many seedlings and young trees are directly injured or killed by the weight of the large snowpack. Even for those young trees that surpass the initial survival challenges, annual growth is much more limited than in Southern SEAK. For a large portion of the year, temperatures are *below* critical thresholds of 40F (for Sitka Spruce) and 50F (for many other plant species), meaning that for much of the year, trees in this area grow very little or not at all. This makes the annual growth increment of Chilkat Valley trees far less than the annual growth of trees in the Temperate Rainforest of Southern SEAK, such as Kosciusko Island.





Tree Species and Botanical Diversity in the Haines State Forest Management Area, as compared to Southern Regions of Southeast Alaska (SEAK).

Because of the substantial climatic differences between Southern SEAK and the North Lynn Canal and Chilkat Valley, the array of species of trees and other plants is also substantially different.

Western Redcedar is one of the 3 primary tree species of Southern SEAK. It is a keystone species of the Temperate Rainforest from Southern SEAK to British Columbia, Western Washington, Oregon and Northern California. Some Western Redcedars reach great ages and grow to enormous sizes. This species has provided enormous cultural and material value to Indigenous Peoples of the Temperate Rainforest region. It has also contributed a large portion of the timber volume logged from Southern SEAK, BC, and the “Pacific Northwest”. The absence of this iconic species from all areas North of Kupreanof Island gives the forests of Northern SEAK a very different character and ecology than Southern SEAK.

At the same time, many species occur in the Chilkat Valley and Northern Lynn Canal area that are rare or absent elsewhere in SEAK. The area’s Continental climate, combined with the natural biological corridor of the Chilkat Valley, have allowed many species associated with drier, more Continental conditions to arrive and thrive. The Alaska Center for Conservation Science made its single identification of the Lodgepole Pine/Cladina Lichen community in the Northern Lynn Canal region (Taiya Valley), making it one of the rarest plant communities identified in the State. The majority of this rare plant community actually occurs in the Chilkat Valley, in the area with the highest summer temperatures. The majority of these occurrences fall within the boundaries of the Haines State Forest Management Area.

Forests in the Chilkat Valley also have a far greater component of deciduous tree species than do forests in the rest of SEAK. Paper Birch is extremely common here, yet entirely absent from Southern SEAK. Black Cottonwood is abundant in the Chilkat Valley, and sometimes attains great size, yet is sporadic and comparatively small throughout the Temperate Rainforest. Scouler’s Willow and other tree-Willows are much more common in the Continental climate of the HSF area. These deciduous tree species support broader and richer biodiversity by providing an array of resources and ecological functions that are rare or absent in the conifer-dominated Temperate Rainforests of Southern SEAK.

Numerous species of deciduous shrubs also occur within the understory and in forest clearings throughout the HSFMA area, yet many of these shrubs are rare or absent in Southern SEAK. These include Soapberry, Highbush Cranberry, Prickly Rose, Dwarf/Shrub Birch, Shrubby Cinquefoil, Snowberry, several species of Currant, Saskatoon, and others.

There is also climatic and ecological diversity across and *within* the area of the HSFMA. This mosaic of different plant communities and microclimates across the Chilkat Valley and the HSFMA mean that no single variable or metric can be used to predict forest growth (or even species!) based on an area-wide formula. And predicting forest growth on the HSF based on data from Southern SEAK is even less valid.

Species of forest pathogens and pests often occur in particular association with specific tree families or genera. Since the Northern Lynn Canal and Southern SEAK support divergent climates and different tree species, it is highly likely that the pathogenic fungi and insects that impact tree growth and forest productivity are also different. Spruce Bark Beetles are present in the Northern Lynn Canal (and throughout interior Alaska), yet very scarce in Southern SEAK. On the other hand, Hemlock Dwarf-Mistletoe is much more common in the Temperate Rainforest, and is nearly absent in the Chilkat Valley. These stark differences make it impossible to determine the impact of current or future pest outbreaks on forest growth, productivity, or “re-stocking” after industrial logging.

APPENDIX B

Conservation Strategy for Haines State Forest

"The first rule of intelligent tinkering is to save all the pieces." This well known quote from Aldo Leopold underscores the fact that a management plan for the Haines State Forest without a comprehensive biological survey is not responsible management. In fact, without at least identifying the "pieces", i.e., the full spectrum of native flora, fauna, and fungi that exist within the forest boundaries, the HSF Revision risks becoming little more than a recipe for converting the forest into a mono crop plantation of Sitka spruce.

Until such a survey is completed, the best available science upon which to make management decisions that consider the welfare of the entire forest - plants, animals fungi -is likely the Tongass National Forest Old-Growth Conservation Strategy. This is not a comprehensive strategy - it lacks detail regarding plants and fungi, and concentrates primarily on forest management that preserves viable and well distributed populations of mammals and birds. And the Tongass is generally warmer and wetter than the Haines State Forest. But it has been fragmented in many regions, similar to the fragmentation that has occurred on the HSF in the two main tributaries of the Chilkat - the Klehini and Kelsall Rivers. It is probably the best model upon which to base a forest plan that considers old-growth reserves and connectivity as an essential aspect of Haines State Forest management.

A strategy that protects keystone and other mammals and birds will at least provide some protection for the full range of species that occur in the forest, and are essential for maintaining true forest health. As a transition zone between temperate and boreal forest, many species occur in the Haines State Forest that are not found in the Tongass, and these need to be incorporated into planning. The occurrence of lynx, for example, which fluctuates from year to year needs to be considered, as well as the needs of migratory birds. Following are excerpts from the Conservation Strategy that should be considered and adopted into the current HSF Revision. References to biogeographic provinces and Large Reserves within the Tongass could be equated with micro-climates within the HSF.

The Haines State Forest and other Alaska State forests are at a crossroads. Extractive industrial scale logging makes no sense, economically or environmentally. Developing new management philosophy based on conservation, as outlined above, should be the new priority. A resilient natural environment is a necessary base upon which to move forward. Until such time, all large timber sales such as Baby Brown and Chilkat Ridge should be deferred, and a moratorium on all sales within the highly fragmented Kelsall watershed should be maintained.

Please see below for relevant excerpts and analysis from the Tongass Conservation Strategy.

The Conservation Strategy was developed in the 1990s and adopted as an integral part of the 1997 {Tongass} Forest Plan, to ensure continued existence of viable populations of old-growth

dependent and old-growth associated wildlife, well-distributed across the Tongass. The Strategy includes a system of Large, Medium, and Small old-growth reserves, a network of old-growth corridors connecting the Medium and Large reserves, and a series of Standards and Guidelines that provide additional protection for species and species groups with conservation needs not fully addressed by the reserve system alone.

The Review Team considered the original purpose and subsequent evolution of the Conservation Strategy, and reviewed recently published scientific information on old-growth-associated species for which the Strategy was developed, additional species for which conservation concerns have been identified, landscape-scale conservation, and reserve design. This information was evaluated in the context of the . . . conservation of ecosystem integrity and diversity, species viability, and climate change resilience.

Update existing Standards and Guidelines addressing species-specific needs by:

- o Developing guidance on management of “post fledging areas” around each 100-acre goshawk nest buffer, to protect adequate habitat for fledglings learning to fly and hunt.
- o Increasing seasonal buffers around known wolf dens to reduce disturbance during pup-rearing, and maintain adequate forest cover for wolves and their prey species.
- o Improving connectivity of Small Old-Growth Reserves (through corridor protection and forest restoration) for flying squirrels and other wildlife.
- Consider additional conservation measures for species with emerging conservation concerns
 - little brown bat, western screech owl.
- Develop monitoring programs for vulnerable species to inform adaptive management.
- Develop a GIS database of existing old-growth corridors that connect designated reserves.
- Identify and retain existing “Very Large” old growth reserves in each biogeographic province.
- Include ADF&G, USFWS, and Tribes in discussions related to modification of the Strategy.

1997 Revised Forest Plan

The Conservation Strategy was initially developed by a team of nine wildlife biologists representing three agencies (U.S. Forest Service, Alaska Department of Fish and Game, and U.S. Fish and Wildlife Service) in the 1990s. This interagency team, known as the “Interagency Viable Population Committee” or “VPOP”, was tasked by the Forest Service with developing a strategy for maintaining viable populations of native wildlife, well-distributed across Southeast Alaska. The committee screened 356 vertebrate species that occur in Southeast Alaska and identified eight species associated with old-growth forest habitats for which there were viability and/or distribution concerns. These species, which served as “design species” for the strategy, included northern goshawk (*Accipiter gentilis laingi*), great blue heron (*Ardea herodias fannini*), Alexander Archipelago wolf (*Canis lupus ligoni*), brown bear (*Ursus arctos*), American marten (*Martes americana*), river otter (*Lutra canadensis mira*), mountain goat (*Oreamnos americanus*), and northern flying squirrel (*Glaucomys sabrinus*). The proposed strategy ultimately included a network of protected habitat patches (“reserves”) connected by forested corridors (primarily marine beach fringe and freshwater riparian buffers), and species-specific management standards deemed important for maintaining viability and distribution (Suring et al. 1993). The reserve system was developed as a “coarse filter” element to meet the needs of species requiring forested tracts of various sizes and was intended to provide “umbrella”

habitat protection for a broad diversity of species beyond the eight old-growth associated species that were used to guide design of the system. Species-specific standards were added as “fine-filter” elements to provide additional protections in the managed “matrix” lands outside the reserves, for species whose needs would not be fully met by the reserve system alone. The Forest Plan designated a system of Large, Medium, and Small Old-Growth Reserves (OGRs) that met specified minimum size, composition, and spacing criteria (USFS 1997 Forest Plan, App. K). At least one “very large” OGR (>120,000 acres) was identified in each biogeographic province where possible (USFS 1997 FEIS App N, p. 21 and ROD, p.7), to address concerns. . . for conservation of brown bear and wolf, which have large home ranges and are sensitive to human interactions (Keister and Ekhardt 1994). We recommend that proposals to adjust large reserves should account for, and maintain, these very large reserves. Connectivity between OGRs was provided by 1,000-foot-wide, protected buffers along all marine and estuary shorelines, and riparian buffers of variable widths. {Note* The Haines State Forest lacks the extensive beachfront marine shoreline common in the Tongass. The 1,000 ft buffer recommendation for shoreline should be applied to the major rivers - Klehini, Kelsall, Chilkat and Chilkoot, Chilkoot Lake - such a corridor also better protects water quality and salmon habitat.}

The network of marine shoreline and freshwater riparian buffers was intended to provide landscape linkages between Large and Medium OGRs. Where these buffers failed to provide continuous, forested connectivity between reserves, additional corridors were to be designated during project-level analyses. Small OGRs were intended to serve as temporary habitat for animals moving between the larger reserves, and as longer-term habitat for species with smaller home ranges (e.g., 20 to 40 flying squirrels per reserve). Acres allocated to Small OGRs could also be used to protect corridors between Medium and Large OGRs where necessary. Forest-wide standards and guidelines were included for each of the other design species. Standards and guidelines that applied only in areas that had been most impacted by timber harvest (not Forest-wide) required retention of legacy forest structure in timber harvest units larger than two acres to provide habitat for goshawks and marten. Haufler’s (2006) review recommended. . .an evaluation of plant association representation in the reserve system to ensure comprehensive conservation of ecosystem biodiversity. Guidance on project-level analyses of wolf mortality was modified to require consideration of human access to the project area via all roads, not just roads open to vehicular traffic.

Below we highlight some of the relevant new information on the original design species. Our discussions here are cursory and intended to be introductory.

Queen Charlotte Goshawk

The VOP committee recommended that no timber harvest be allowed within a core area of about 1,600 acres surrounding each goshawk nest, no roading or recreational development within ¼ mile (126 acres) of each nest, and harvest of no more than 5 percent of the productive old growth per decade in the remainder of the (approximately 5,000-acre) home range outside the core area (Suring et al. 1993).

Alexander Archipelago Wolf

Recommendations specifically addressing management of denning habitat on the Tongass are provided by Roffler and Gregovich (2018), who recommended expanding seasonal den site buffers to at least 734m (approximately ½ mile), including as much flat, low-elevation old-growth near freshwater as possible, and retaining productive old-growth forest on at least 61 percent of each core denning area. The U.S. Fish and Wildlife Service is currently evaluating a 2020 petition to list the subspecies as threatened or endangered (the fourth such petition since 1993). . .The importance of large reserves in minimizing overharvest of wolves, and the impacts associated with higher road densities, are highlighted by Person and Logan (2012), Person and Russell (2008), and WTC (2017).

Northern Flying Squirrel

Smith and Person (2007) studied demographic viability of flying squirrels in small reserves of various composition, with different levels of landscape connectivity versus isolation. They concluded that small OGRs do not have a high probability of supporting flying squirrel populations in isolation for long periods. The contribution of small OGRs to conservation of flying squirrels depends on the degree of isolation and functional connectivity with other large, medium, or small reserves. Smith and Person(2007) suggested that conservation planning that explicitly considers quality and configuration of OGRs in a modified landscape is essential to ensure functional metapopulations of flying squirrels. Additional research suggested that local extirpations are likely, especially in smaller reserves (Smith et al. 2011).

American Marten

A habitat selection study on Chichagof Island (using data from the 1990s) confirmed selection for structurally complex, old-growth forest habitats (Flynn and Schumacher 2016). On Kuiu Island, important predictors of marten habitat at landscape scales included lower elevation, closed canopy old-growth forest in areas with higher densities of salmon streams near the coast (Koch 2016). The predictor variables of marten habitat from Koch (2016) confirm the continuing need for old-growth forest and riparian zone protections in lower elevation areas, and provide support for potential modifications where such habitat protection is lacking.

Brown Bear

New findings on brown bears include studies related to resource and habitat selection, spatial use, movement patterns, and home range sizes (Crupi et al. 2014, Flynn et al. 2007); diet and the role of bears in the food web (Harrer and Levi 2018, Shakeri et al. 2018); and impacts of humans on bear foraging (Wheat and Wilmers 2016). The most relevant findings from Flynn et al. (2007) documented differences in habitat selection by male and female brown bears in altered versus less altered watersheds on Chichagof Island. They found that bears, especially females, spent more time farther from salmon spawning streams, and female bears were more abundant and consumed more salmon in less altered watersheds. Based on spatial use patterns adjacent to salmon streams, Flynn et al. (2007) recommended retention of at least 500 ft no-cut buffers along streams with spawning salmon and larger buffers and/or increased

habitat protections (or total deferment of vegetative management) where bear populations are a management objective.

Mountain Goat

Recent literature on mountain goats confirm that they are sensitive to climatic variables including amount of snowfall in winter and heat stress in summer, both of which can reduce mountain goat survival (White et al. 2018, White et al. 2011). White et al. (2018) predicted that projected increases in summer temperature would have stronger negative effects on mountain goat populations than the potential positive effects of reduced winter snowfall, prompting concerns over species persistence. Other research focused on colonization history, phylogenetics, habitat selection and genetic isolation of Southeast Alaska populations (Shafer et al. 2012, Shafer et al. 2010). Shakeri et al. (2021) demonstrated that mountain goats exhibited a strong degree of seasonal range fidelity, with space use expanding in the summer and constricting during the winter. Continuing to emphasize protection of critical winter habitat, which is often old or mature forests in lower elevation areas near cliffs, may be an important consideration in the Conservation Strategy and in light of future climate scenarios.

Little Brown Bat

Populations of the little brown bat have been declining across North America, primarily due to mortality caused by white-nose syndrome, a fungal disease that has spread rapidly since it was first detected in New York in 2006. The disease was detected in British Columbia in 2023, and is expected in Southeast Alaska in the near future. The U.S. Fish and Wildlife Service is currently evaluating whether to list the species range-wide. Research on the Tongass has documented that little brown bats near Juneau hibernate in dispersed sites, close to summering areas, which may slow the spread of white-nose syndrome and reduce impacts to Southeast Alaska populations should it arrive in Alaska (Blejwas et al., 2021).

Western Screech-Owl

Recent research in Southeast Alaska has confirmed that the species is found primarily at lower elevations and is often associated with riparian habitats (Lewis and Kissling 2009). Concerns over impacts to screech-owls due to habitat loss and competitive exclusion by barred owls (*Strix varia*) have led to federal listing of the western screech-owl as “Threatened” under the Species at Risk Act in adjacent British Columbia (COSEWIC 2012, Elliot 2006). Similar concerns for habitat impacts and competitive displacement by barred owls have been raised for (unlisted) populations elsewhere (Acker 2012, Cannings and Angell 2001, Hardy et al. 1999). Competition from barred owls for prey and nest sites, and suspected direct predation have also been implicated in declines of spotted owls (*Strix occidentalis*), screech-owls, and other species in the Pacific northwest, as barred owls have expanded their range across the region (Acker 2012, Olson et al. 2005, Kelly et al. 2003, Pearson and Livezey 2003, Cannings and Angell 2001). Similar dynamics may be occurring as the barred owl expands its range northerly into Southeast Alaska. Kissling et al. (2009b) documented apparent displacement of western

screech-owls in southern Southeast Alaska by barred owls, as the distribution and occupancy rate of barred owls expanded, particularly on the mainland, and distribution of screech-owls narrowed between historic (1986-1992) and recent (2005-2008) surveys. Lewis and Kissling (2009) and Kissling and Lewis (2009) recommended continued or expanded protection of valley-bottom forests and riparian zones to assure presence of large snags with natural cavities, given the paucity of primary cavity excavators (woodpeckers) in Southeast Alaska, to provide adequate nest sites. Kissling and Lewis (2009) also recommended retention of patches of legacy forest structure in timber harvest units to provide nesting and roosting structure for owls, and more intensive investigation of genetic structure among owl populations across Southeast Alaska. They also recommended further evaluation of diet and habitat use by barred owls in Southeast Alaska, as potential competitors of screech-owls and other raptors, including goshawks.

Recent Developments in Conservation Reserve Design

Lertzman and MacKinnon (2013) recommended a watershed approach to reserve design, particularly along the North Pacific coast of Southeast Alaska and British Columbia, where opportunities to protect undeveloped watersheds, from headwaters to saltwater, still exist. Schoen and Albert (2007) developed an example of how such an approach could work on the Tongass by integrating Albert and Schoen's (2007) "Conservation Priority Watersheds" where ecological values were highest, and "Timber Production Watersheds", where ecological values were lower and timber harvest could be concentrated within the smallest land base and fewest miles of roads with the least cumulative impact on intact habitat values. The strategy was specifically designed to maintain biodiversity and ecological integrity of the Southeast Alaska rainforest ecosystem while also providing for a sustainable timber industry within the region. (Old-growth forest in Albert and Schoen's (2007) Conservation Priority Watersheds were designated as unsuitable for harvest in the 2016 Tongass Forest Plan.) A watershed approach allows for effective conservation of representative ecosystem and species diversity, and continuation of ecological processes and natural disturbance regimes. Protection of adjacent watersheds can be particularly good for providing connectivity to surrounding lands (Lertzman and MacKinnon 2013). Many of the reserves in the Tongass' Conservation Strategy currently cover complete watersheds. A review of Large and Medium OGRs may reveal opportunities to extend such protection and improve reserve functionality where existing boundaries exclude portions of undeveloped watersheds. We do not recommend proposals that would reduce conservation of entire watersheds where such protection currently exists.

Inadequate consideration of climate change during development of the NWFP has been identified as a potential weakness of the NWFP (Spies et al. 2019, Spies et al 2018, DellaSala et al. 2015). Because the effects of climate change are expected to be pervasive, rather than localized like most stochastic stressors, there is concern that persistence of even widely dispersed species could be compromised in spite of the redundancy provided by many widespread local populations (DellaSala et al. 2015).

Smith and Flaherty (2023) recently issued . . . cautionary notes about species conservation on the Tongass. For example, small OGRs were originally intended to serve the dual purposes of providing temporary habitat for animals dispersing through the managed matrix and supporting

resident species with smaller home ranges (specifically, 1 female marten and 20 to 40 flying squirrels in each small OGR) (Suring et al. 1993). Research on population demographics and dispersal capability of flying squirrels on POW, however, suggests that many small OGRs are too small to reliably support populations of flying squirrels over the long term, and are too isolated to allow for adequate immigration from source populations (Smith and Flaherty 2023, Smith et al. 2011).

Wildlife conservation within the NWFP area (and on the Tongass) is complicated by many forces beyond the control of the Forest Service. Some of these factors have compromised progress toward the NWFP's goals (Spies et al. 2019). Nevertheless, there are actions that the Forest Service can take to address perceived deficiencies. DellaSala et al. (2015) recommended a variety of improvements to the NWFP, including enhanced forest reserve protections, carbon storage capacity, aquatic conservation, and at-risk species recovery. Spies et al (2019) recommended collaboration with stakeholders to restore ecosystem dynamics and structural diversity at multiple scales using local workers as a way to simultaneously promote climate change resilience, economic opportunities, and public support for agency management.

Given the inherent uncertainty associated with viability and fate of affected species and the roles of various taxa in ecosystem function, monitoring and adaptive management will remain crucial to maintaining the effectiveness of both the NWFP (Spies et al. 2019, Spies et al. 2018, DellaSala et al. 2015) and the Tongass' Conservation Strategy (Smith and Flaherty 2023, Marcot 2013, USFS 2008 Workshop Proceedings, Haufler 2006). Statistically defensible monitoring programs can often be resource intensive, but creative approaches that rely on emerging technologies to document species presence (e.g., acoustic monitoring, environmental DNA, etc.) and habitat distribution (e.g., habitat capability modeling based on remote sensing) may allow for increased efficiencies.

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Climate Change Considerations

The Tongass, however, has been recognized as an important contributor to global climate mitigation due to its ability to sequester vast quantities of carbon, amounting to approximately 20 percent of the entire carbon stock held by the entire National Forest system (DellaSala et al 2022). The documented ability of mature and old-growth forests to capture and hold carbon far more effectively than younger forests (Moomaw et al. 2019), and the Tongass's globally significant contribution in this regard, has prompted recommendations to increase protection of . . . old-growth across the Forest (DellaSala et al. 2022).

. . . recent findings support DellaSala's (2015) earlier recommendation to consider more and larger reserves on the Tongass, particularly on north-facing slopes as potential climate micro-refugia. Areas identified as likely to provide greater climate stability should also be considered for reserves, if not already protected (DellaSala et al. 2018)

Building climate change resilience into Forest Plans is a focus of the 2012 Planning Rule. . . . it is clear that many elements of the current Conservation Strategy, such as protected reserves and connecting corridors, will remain important as the Forest Service endeavors to provide for biodiversity in a changing environment. . . It is likely that some aspects of the Conservation Strategy could be expanded or otherwise modified to serve broader purposes than originally envisioned.

We recommend, for example, a spatially explicit evaluation of the connecting corridors designated in the current Conservation Strategy to ensure their adequacy to support movement (including upslope and northerly migration) and maintenance of species expected to be affected by climate change. Nuñez et al. (2013), demonstrated a methodology for identifying broad corridors for movement of organisms between areas where human influence was low while simultaneously routing the corridors along present-day spatial gradients of temperature to facilitate climate resilience in the Pacific Northwest.

{Include} climate refugia, and incorporating core habitats of diverse taxa in addition to biodiversity hotspots, to maximize reserve system resilience. Climate change is likely to trigger or facilitate many other impacts to species and habitats across the Tongass. With continued warming, hydrologic changes related to more rapidly melting glaciers and rising elevation of the winter snowline will alter discharge in many rivers and streams across Southeast Alaska, which will have important consequences for terrestrial ecosystems (Wolken et al 2011). Effects of climate change on salmon, and the many species that rely on nutrients provided by them, are likely to vary depending on location and extent of temperature changes, and could include accelerated or depressed growth rates, or elevated mortality (Zhang et al. 2019). Invasive competitors, novel pathogens and forest pests, increased occurrence of fire, more frequent and significant droughts and floods, loss of alpine habitats to forest encroachment, accelerated primary succession of deglaciated areas, and shifts in plant and insect phenology are all likely to occur (Buma and Barrett 2015, Shanley et al. 2015, Marcot 2013, Wolken et al. 2011, Gayton 2008, Haufler 2006). Increases in vapor pressure deficits could reduce growth of trees (Lopez et al. 2021, Grossiord et al. 2020), impacting timber harvest and forest restoration programs. These changes are likely to interact in unpredictable ways that could create additional unforeseen impacts. . . We recommend a review of each species expected to be vulnerable to climate change, to consider what threats might be within the Forest Service's ability to reduce.

Ecosystem Diversity and Integrity

Expansion of the scope of the Conservation Strategy to embrace the full diversity of habitats on the Tongass could help ensure conservation of species not directly associated with old-growth forests. A Conservation Strategy that addresses biodiversity beyond old-growth forest systems

could help provide for the needs of amphibians and other species that are less dependent on old-growth forests.

Collectively, the “3Rs” are key to implementation of the . . . vision for ecosystem integrity, providing a basis for maintaining adaptive capacity to withstand stressors, diversity of plant and animal communities, and persistence of native species. Resilience refers to the ability of a species or population to withstand perturbations, and relies largely on provision of adequate amounts of functional habitat. This is analogous to the integrity element required by the Planning Rule. Representation acknowledges that organisms exist across a spectrum of natural habitats and conditions, and that this diversity should be maintained to preserve the adaptive potential and range of natural ecosystem processes that have developed through periods of environmental volatility and stability over eons. The third element, redundancy, recognizes that functional protection must be provided in multiple locations at appropriate scales to ensure that all populations of any species will not be impacted by a major perturbation event. We recommend that each of the plant associations (or other categories of ecosystems/habitats if alternative classification systems are used) on the Tongass be protected in multiple locations where possible and appropriate. This redundancy is especially important for rare communities, which may be particularly vulnerable to stochastic stressors.

Depending on how resource development and other activities are constrained or otherwise managed, a Forest Plan without dedicated Old-Growth Reserves and species-level standards and guidelines may or may not adequately provide for ecosystem integrity and long-term persistence of the full range of biodiversity across the Tongass. Extraction of natural resources such as timber and minerals, and development of infrastructure such as roads, buildings, and transmission lines have potential to put some wildlife populations at risk (Cook and MacDonald 2013). Species that require large tracts of habitat with minimal human disturbance are also particularly vulnerable.

The greatest impacts to wildlife habitat in Southeast Alaska since the arrival of Europeans have been from industrial-scale logging of old-growth forests. If old-growth logging continues, it must be managed to ensure that ecosystem integrity and diversity are conserved and persistence of the full diversity of native wildlife is maintained. Risks to old-growth-dependent wildlife will be dramatically reduced if harvest of old-growth forest is prohibited. Forest Plan alternatives that limit logging to existing second-growth stands will be more likely to provide for ecological sustainability. Large tracts of undisturbed habitat will, by default, remain intact if future logging is restricted to existing second-growth.

A Strategy that conserves the complete range of ecosystem diversity will help ensure that all the necessary parts of this complex “machine” remain intact. Haufler (2006) recommended using plant associations to verify that ecosystem diversity is comprehensively represented within the reserve system. There may be other ecosystem classifications in use that would offer better resolution for the purposes of evaluating representation of ecosystem diversity. We stress that regardless of which ecosystem classification system is used, representation should be redundant (where possible), to account for stochastic disturbances, and forward-focused to account for projected changes attributable to climate change and natural succession.

The existing Conservation Strategy endeavors to address the needs of Southeast Alaska's unique diversity of endemic species and subspecies, genetic lineages, and isolated wildlife and plant populations through coarse filter protection of reserves connected by forested corridors.

Monitoring and adaptive management will be crucial, especially for species, lineages, and populations known or suspected to be sensitive to human-induced habitat alteration or climate change, and for species for which other conservation concerns have emerged. Uncertainty will remain an inherent element of species viability, especially in a changing environment.

Monitoring will allow for informed evaluation of how well the revised Forest Plan provides for that viability. Adaptive management will allow managers to adjust as necessary to respond to new information.

From: [Sue Libenson](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: comment re: Haines State Forest Resource Management Plan
Date: Friday, June 5, 2026 5:07:43 PM

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It's not exactly convenient to solicit public comments at the height of summer activity, but I'm compelled to weigh in. Really, what are you thinking? The economy and livelihood, not to mention the appeal of living in the Chilkat Valley, rely on intact forests, or what's left of that, to support fish, wildlife, and the opportunity for quality of life. The changes proposed are a sham to take perfectly workable land designations, which gave some predictability and conservative wisdom, to lands in the Chilkat Valley and move to a free-for-all approach where designations are thrown to the wind and virtually everything will be open to logging. Yes, there may be some perfunctory public comment. But, really, why create a system that could double logging in our not-so-fast growing forest when we have plenty for local loggers to work with and larger sales would just ship it off with less trees, habitat, or lumber for local needs.

Leave the Haines State Forest management as is and please reconfigure to a plan based in reality of local needs and wishes, not some aggrandizing plan to cut it down and ship it off.

Respectfully,

--

Sue Libenson
[REDACTED]



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From: [Katharine Palmer](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Haines State Forest draft plan comments
Date: Friday, June 5, 2026 4:56:31 PM
Attachments: [HSF comments 6526.pdf](#)

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Dear Forester,

My name is Katharine Palmer and I have lived in Haines for 37 years and have spent time in the Haines State Forest during each of those years. My activities there include: picking blueberries, high bush cranberries, and morels, paddling a kayak down the Chilkat and Kelsall Rivers, skiing, biking, bird watching, plant studies, and subsistence fishing.

In my first year here, I planted spruce seedlings in the HSF's clearcuts. I'd never been in a clearcut before and I was horrified by the devastation wrought, and over the years, by the extremely poor recovery of the forest.

I quit picking blueberries on Sunshine Mountain because it has become overgrown and kind of impenetrable and dangerous. It does not appear to be recovering after being clearcut many decades ago. In contrast, downhill from the tangled vegetation of Sunshine Mountain towards the Klehini River valley was the majestic old growth forest, open and easy to walk in, and inhabited by nesting goshawks!

As an Alaskan who uses the forest, I am a stakeholder whose rights the Alaska Constitution guarantees. The state is required to manage the Haines State Forest for the benefit of Alaskans. However, clearcutting the HSF has only ever resulted in net financial losses to the State of Alaska, degradation of its ecosystem services, economic losses to Haines citizens and businesses, and ultimately losses to and of all species that depend on an intact forest. Any impacts on the HSF will also affect the Alaska Chilkat Bald Eagle Preserve.

One example is the Kelsall River Valley which had been clearcut years ago resulting in loss of king salmon spawning habitat, loss of woody debris and high temperatures. When king returns dropped precipitously, subsistence, commercial, and sport fishers were told not to keep king salmon for a number of years. That impacted the local economy and people, the wildlife, and the forests who depend on the return of salmon for their well-beings. Finally, this year ADFG is allowing kings to be fished since their numbers have increased. We'll see how that goes.

Catastrophic landslides in Haines in 2010 that caused loss of human life, housing, roads, debris, creek beds overflowing, etc., taught Haines residents the value of forest cover to prevent landslides, flooding, and to protect water quality.

Haines is known for having the greatest biodiversity in Alaska. I strongly support research studies on this unique forest and its inhabitants in order that we know what is here and how best to protect and utilize it. Rather than doubling the timber base, how about supporting a BIO-BLITZ here to educate all of us!

It is criminal to change the HSF plan to add all acres into the timber base. My understanding of that idea is to increase the possible carbon credits that the forest could provide. However, most of the valuable timber was cut long ago, the second growth is not of value, and the remaining old growth needs to be protected.

The HSF has nothing to offer the legitimate carbon credit market. And more timber harvesting/clear cutting will only degrade the environment, wildlife habitat, fisheries, recreation, and put at risk the economy and security of the valley.

I support: small timber sales to benefit local sawyers and their customers; harvest of house logs and firewood by citizens by permit; traditional rights of the original inhabitants of the valley; leaving all old growth intact, cancellation of the Baby Brown and Chilkat Ridge sales; double the rotation period for all logging; banning export sales; keeping the distinct units in the HSF plan and prohibiting any logging in Wildlife Habitat and Recreation units. I am opposed to allowing any herbicides, pesticides, or mining in the HSF.

thanks for considering my comments,

Sincerely,

Katharine Palmer

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Sincerely,
Katharine Palmer

From: [Tyler Breen](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#); [Douse, Jeremy A \(DNR\)](#); [Palmieri, Greg J \(DNR\)](#)
Subject: SEACC Comments on the Haines State Forest Resource Management Area Management Plan Amendment
Date: Friday, June 5, 2026 4:23:45 PM
Attachments: [\[FINAL\] Comments on the Haines State Forest Plan Amendment Substantive Procedural Concerns.pdf](#)

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Dear Division of Forestry and Fire Protection team,

Attached are comments from the Southeast Alaska Conservation Council on the Haines State Forest Resource Management Area plan amendment, focusing on the proposed increases in commercial timber harvest, protections for fish and wildlife habitat, and consistency with governing statutes, regulations, as well as sustained yield and common use mandates. Please confirm receipt of these comments and we look forward to seeing the Division's response.

Please contact me at tyler@seacc.org if you have any questions.

Thank you,

Tyler

--

Tyler Breen
Policy Analyst
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cell: (805) 208-6515
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Schedule a meeting with me [here](#).
Southeast Alaska Conservation Council
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SEACC is grateful to work on LÍngít Aaní

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Comments on the Haines State Forest Plan Amendment: Substantive Procedural Concerns

Introduction

The Southeast Alaska Conservation Council (SEACC) appreciates the opportunity to comment on the April 2026 Public Review Draft amendment to the Haines State Forest Resource Management Area (HSF RMA) Management Plan.¹ The Haines State Forest sits at the heart of the Chilkat Valley's salmon, wildlife, and recreation economy, and its statutory design reflects decades of local work to balance timber, habitat, subsistence, and community uses in one of Alaska's most complex landscapes.²

As a regional conservation organization with long-standing engagement in Haines, SEACC is deeply concerned that both the substance of this amendment and the process used to develop it do not conform to the State's statutory framework for the HSF RMA, the Forest Resources and Practices Act, and the State's multiple-use and sustained-yield obligations under statute and the Alaska Constitution.³ We urge the Department of Natural Resources (DNR), Division of Forestry & Fire Protection (DFFP), and partner agencies to reset this process in a way that restores meaningful public participation, honors legislatively mandated consultation, and realigns the plan with the legal purposes of the Haines State Forest.

Regulatory framework

1. HSF RMA statutes: AS 41.15.300–41.15.330

The HSF RMA statutes establish both the area and the legal purposes that must guide this plan.⁴ Key requirements include:

- **Purpose and primary uses (AS 41.15.300):** The HSF RMA is established “for the utilization, perpetuation, conservation, and production of the land and water...

¹ Haines State Forest Plan, Public Review Draft, April 2026.

² AS 41.15.300–.330; Haines State Forest Plan, ch. 1

³ AS 41.15.300–.320; AS 41.17.010–.060; Alaska Const. art. VIII §§1–4.

⁴ AS 41.15.300–.330



including but not limited to the use of renewable and nonrenewable resources through multiple-use management and the continuation of other beneficial uses including traditional uses and other recreational activities.”⁵

- **Assignment of management (AS 41.15.300–.305):** Management responsibility is assigned to DNR, with explicit recognition that land and water identified in AS 41.15.305 may be used for carbon offset projects only where consistent with the applicable management plan.⁶
- **Coordinated management and consultation (AS 41.15.310):** The Division “shall consult” with ADF&G, each local fish and game advisory committee (AC) with jurisdiction, and the Alaska Chilkat Bald Eagle Preserve Advisory Council “to promote effective, efficient, and coordinated administration” of the HSF RMA and the Alaska Chilkat Bald Eagle Preserve.⁷
- **Multiple-use and sustained yield (AS 41.15.315):** The HSF RMA “shall be managed under the principles of multiple use and sustained yield and under AS 41.17,” guarantees continued traditional use at existing levels by traditional methods, and limits land disposal and sales.⁸
- **Management plan and regulations (AS 41.15.320):** In adopting a forest management plan under AS 41.17.230, DNR “shall consult” with ADF&G and the governing bodies of each municipality in the general area, and regulations “may not be adopted... without prior review at a public hearing in Haines and Klukwan.”⁹

These provisions make clear that:

- (1) the HSF RMA is not a general-purpose timber base;
- (2) multiple-use and sustained yield must be applied in a way that protects traditional, habitat, and recreational values; and
- (3) the legislature has embedded robust consultation and local hearing requirements directly in statute.

2. Forest Resources and Practices Act: AS 41.17.010–.955

The Forest Resources and Practices Act (FRPA) provides the overarching policy and standards that must guide this plan.¹⁰ Key elements relevant to this amendment include:

⁵ AS 41.15.300(a)

⁶ AS 41.15.300(b)–(c)

⁷ AS 41.15.310(a)–(b)

⁸ AS 41.15.315(a)–(e)

⁹ AS 41.15.320

¹⁰ AS 41.17.010–.955



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- **Declaration of intent (AS 41.17.010):**
 - Forest resources provide timber, fish and wildlife, tourism, recreation, water, soil, and “general health and welfare.”¹¹
 - The State has an “obligation to ensure that management of forest resources guarantees perpetual supplies of renewable resources... and serves the needs of all Alaska for the many products, benefits, and services obtained from them.”¹²
 - Administration should combine professional management, regulatory measures, and economic incentives, and explicitly establishes fish habitat and nonpoint pollution standards.¹³
- **Duties of the division and commissioner (AS 41.17.030, .055, .060, .070, .080, .098):**
 - The division must manage state forests and provide public information and assistance.¹⁴
 - Regulations and management must be based on updated, interdisciplinary data, recognize environmentally sensitive areas, maintain sustained yield, prevent significant impairment of productivity, and provide for scenic quality and important fish and wildlife habitat on state and municipal lands (AS 41.17.060(b)–(c)).¹⁵
 - The commissioner must maintain a long-range plan demonstrating that FRPA’s intent and standards are being met, with an inventory/assessment of timber.¹⁶
 - The commissioner must coordinate with other agencies, give due deference to DEC on water quality and ADF&G on fish and wildlife habitat, and document reasons for disagreement.¹⁷
- **Management plans for state forests (AS 41.17.200–.230, .220):**
 - Primary purpose of state forests is “timber management that provides for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources.”¹⁸
 - Land within a state forest must be managed under the sustained yield principle, FRPA, and a forest management plan prepared by DNR.¹⁹

¹¹ AS 41.17.010(1)

¹² AS 41.17.010(3)

¹³ AS 41.17.010(4)–(7)

¹⁴ AS 41.17.030

¹⁵ AS 41.17.060(b)–(c)

¹⁶ AS 41.17.070

¹⁷ AS 41.17.098

¹⁸ AS 41.17.200(a)

¹⁹ AS 41.17.220(a)



- The forest management plan must be consistent with AS 38.04.005 and FRPA, consider and permit other uses (recreation, tourism, mining, fish and wildlife uses, and others) to the extent compatible with the primary purpose, and explicitly identify where and when uses are incompatible and why (AS 41.17.230(a)).²⁰
- The commissioner “shall review and revise a forest management plan when necessary,” and may not adopt or revise a plan without public hearings in communities proximately located to the forest (AS 41.17.230(b)–(c)).²¹

Together, these provisions require that the Haines plan amendment:

- (a) be grounded in current interdisciplinary information, including habitat and climate realities in the Chilkat;
- (b) demonstrate that sustained yield and multiple-use standards are met at the forest and unit level; and
- (c) be adopted only through a process that includes robust public hearings and meaningful interagency consultation.

3. Multiple use and sustained yield: statute and constitutional framing

Multiple use and sustained yield appear in several interlocking authorities:

- HSF RMA statute (AS 41.15.315(a)): The HSF RMA “shall be managed under the principles of multiple use and sustained yield and under AS 41.17.”²²
- FRPA standards (AS 41.17.060(c)(1)–(3), .950(25), (26)):
 - State and municipal forest land “shall be administered for the multiple use of the renewable and nonrenewable resources and for the sustained yield of the renewable resources... in the manner that best provides for the present needs and preserves the future options of the people of the state.”²³
 - Allocation of predominant uses in contiguous areas must reflect “in reasonable proportion the various resources and values present in that area,” and administration must “provide for the continuation of businesses, activities, and lifestyles that are dependent upon or derived from forest resources.”²⁴

²⁰ AS 41.17.230(a)

²¹ AS 41.17.230(b)–(c)

²² AS 41.15.315(a)

²³ AS 41.17.060(c)(1)

²⁴ AS 41.17.060(c)(2)–(3)



- “State forest” is defined as an area retained to provide a base for sustained-yield management of renewable resources and permit a variety of beneficial uses.²⁵
- “Sustained yield” means achieving and maintaining a high-level, perpetual output of renewable resources “without significant impairment of the productivity of the land and water,” without requiring a non-declining timber yield at all times.²⁶
- **Alaska Constitution (relevant sections):**
 - Article VIII, §1: “It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest.”²⁷
 - Article VIII, §2: “The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State... for the maximum benefit of its people.”²⁸
 - Article VIII, §4: Fish, wildlife, and waters are to be “utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.”²⁹

Read together, these provisions require not merely that multiple uses be *allowed* in name, but that the plan actively balance timber with fish, wildlife, traditional use, recreation, and community well-being in a manner that preserves future options and avoids significant impairment of land and water productivity.

Extent to which the current process and draft plan satisfy these requirements

1. Substantive alignment with HSF RMA statute and FRPA

The 2026 draft amendment describes a fundamental change in management direction, explicitly “aligning resource use in the forest with the establishing statute language” and “includ[ing] commercial forest resources across the Forest in the timber harvest program,” such that “commercial timber available for harvest has been identified in all land

²⁵ AS 41.17.950(25)

²⁶ AS 41.17.950(26)

²⁷ Alaska Const. art. VIII §1

²⁸ Alaska Const. art. VIII §2

²⁹ Alaska Const. art. VIII §4



designations.”³⁰ At the same time, the amendment opens areas previously designated for wildlife habitat and public recreation to timber harvest and emphasizes expanded AAC based on a 2025 inventory and growth model.³¹

Several issues arise under AS 41.15.300–.320 and AS 41.17.010–.060, .200–.230:

- **Shift from designated, unit-based multiple use to forest-wide timber emphasis:**
The 1986 and 2002 plans used subunit-specific land use designations (Forestry, Resource Management, Public Recreation, Wildlife Habitat) to distribute primary uses, with timber allowed or excluded accordingly in order to balance habitat, scenic, and recreation values.³² The amendment instead identifies commercial timber across all designations, while retaining only general language that other uses “may” be considered where compatible.³³ This risks undermining FRPA’s requirement that allocations reflect in reasonable proportion “the various resources and values present in that area” and that uses incompatible with others be expressly identified, with reasons and benefits, in the management plan (AS 41.17.060(c)(2); 41.17.230(a)).³⁴
- **Questionable sustained-yield assumptions under local conditions:**
The plan’s AAC and sustained-yield determination rest heavily on a regional growth model and a 120-year rotation assumption.³⁵ Local operators have raised concerns, reported in the *Chilkat Valley News*, that growth rates in the colder Haines climate suggest re-harvest intervals closer to 300–400 years for some clearcuts in the valley.³⁶ If the sustained-yield calculation does not adequately account for local productivity and climate effects, it may fail to meet FRPA’s requirement to ensure perpetual supplies of renewable resources and avoid significant impairment of land and water productivity (AS 41.17.010(3); 41.17.060(c)(5), (23), (26)).³⁷
- **Treatment of habitat, scenic, and recreation values in newly opened areas:**
The amendment acknowledges that units around the Takhin, Chilkat Inlet, and Chilkoot Lake were previously designated primarily for wildlife habitat and recreation and are now being considered for timber.³⁸ While unit guidelines call for

³⁰ Haines State Forest Plan, ch. 1, “Changes in This Amendment.”

³¹ Haines State Forest Plan, ch. 1–2; “State seeks to expand logging in Haines State Forest, some question economics,” *Chilkat Valley News*, Feb. 4, 2026.

³² Haines State Forest Plan, ch. 3, land designations and unit descriptions.

³³ Haines State Forest Plan, ch. 1–3

³⁴ AS 41.17.060(c)(2); AS 41.17.230(a).

³⁵ Haines State Forest Plan, ch. 1–2

³⁶ “State seeks to expand logging in Haines State Forest, some question economics,” *Chilkat Valley News*.

³⁷ AS 41.17.010(3); AS 41.17.060(c)(5), (23), (26)

³⁸ Haines State Forest Plan, unit descriptions; *Chilkat Valley News*



smaller even-aged harvest blocks, screening from the highway or Chilkat Inlet, and coordination with ADF&G, the plan does not clearly quantify or map how much of these units will remain functionally managed for habitat, recreation, and scenic values, nor does it make explicit “findings of incompatibility” and benefits as required by AS 41.17.230(a).³⁹

From SEACC’s perspective, this amendment effectively rebalances the HSF RMA toward greater timber availability without demonstrating (at a forest-wide or unit scale) that the statutory requirements for multiple use, sustained yield, habitat protection, and continued traditional use are still being met.

2. Consultation and public process: statutory compliance and quality of engagement

The HSF RMA and FRPA require specific forms of consultation and public process:

- **Mandatory consultation with advisory committees and the Preserve Council (AS 41.15.310, .320):** DFFP “shall consult” with ADF&G, each local fish and game AC with jurisdiction, and the Chilkat Bald Eagle Preserve Advisory Council for coordinated administration.⁴⁰ In addition, in adopting a forest management plan, DNR “shall consult with” ADF&G and the governing bodies of each municipality in the general area, and neither DNR nor ADF&G may adopt regulations for HSF RMA without public hearings in Haines and Klukwan.⁴¹
- **FRPA’s broader coordination requirements (AS 41.17.055(e), .098):** The commissioner must consult with and draw upon the expertise of “interested organizations, enterprises, individuals, government agencies, educational institutions, and landowners,” and coordinate with affected agencies in decisions on plans of operations and variations.⁴²

The 2026 plan itself describes a process in which:

- DFFP “conducts regular reviews of the Forest Plan during the process of executing projects” and each time the Five-Year Schedule of Timber Sales is produced,

³⁹ AS 41.17.230(a); Haines State Forest Plan, ch. 2–3

⁴⁰ AS 41.15.310

⁴¹ AS 41.15.320

⁴² AS 41.17.055(e), 41.17.098.



including “other agencies and the public,” and that amendments and special exceptions may be initiated through agency or public proposals.⁴³

- Commercial recreation and SUDs are to be reviewed at five-year intervals to ensure compliance with management intent, with opportunities for adjustment where necessary.⁴⁴

However, reporting by *Chilkat Valley News* and local accounts suggest that, in practice, advisory bodies and local stakeholders have often experienced the HSF RMA and Board processes as largely perfunctory rather than genuinely collaborative:

- In covering the 2026 amendment, the *Chilkat Valley News* reports that state officials have framed the change largely as a technical alignment and expansion of logging opportunities, while community concerns have focused on habitat, recreation, and economic feasibility.⁴⁵ The article notes that while local loggers and local interest groups have provided substantive feedback on regrowth periods, infrastructure costs, and the value of inaccessible habitat, the state’s modeling and plan narrative do not directly address these local data and concerns.⁴⁶
- Local sources quoted in the article describe a long-standing pattern where planning documents and five-year schedules are noticed and technically available for comment, but the structure and timing of meetings and the volume of technical material make it difficult for advisory committees and the broader public to influence substantive decisions; particularly regarding large-scale sales like Baby Brown and the proposed Chilkat Ridge sale.⁴⁷

From SEACC’s standpoint, this raises two issues:

1. **Formal sufficiency vs. substantive consultation:** While it appears that statutory minimums for notice and certain hearings may have been met (e.g., plan availability, some public meetings, incorporation of past surveys), the process has not provided a genuine opportunity for the Chilkat Bald Eagle Preserve AC, the Upper Lynn Canal Fish and Game AC, Borough officials, Tribal governments, or the broader public to shape the scope, alternatives, and core assumptions of this amendment, particularly the expansion of commercial timber access.⁴⁸

⁴³ Haines State Forest Plan, ch. 1, 4

⁴⁴ Haines State Forest Plan, ch. 4, Special Use Designations and SUD review.

⁴⁵ “State seeks to expand logging in Haines State Forest, some question economics,” *Chilkat Valley News*

⁴⁶ Ibid

⁴⁷ Ibid

⁴⁸ Haines State Forest Plan, ch. 1, 4; *Chilkat Valley News*



2. **Advisory committees as a box-checking mechanism:** The HSF RMA statutes clearly envision local ACs and the Preserve Council as partners in coordinated management, not simply bodies to be notified at the end of an internal planning process.⁴⁹ Yet, as reflected in the AC's responses to this process, they bodies were brought in late, with pre-decided timber objectives already reflected in the HSF RMA plan ammendment, effectively using their brief review as a way to satisfy consultation requirements rather than an opportunity to co-design management strategies.⁵⁰

In SEACC's view, this undermines both the letter and the spirit of AS 41.15.310–.320 and AS 41.17.055(e), and is out of step with the constitutional expectation that natural resource decisions be made for the maximum benefit of Alaskans through transparent, participatory processes.

Recommendations

SEACC recommends that DNR and DFFP:

1. Restart the amendment process with new notice and scoping, designed around statutory partners

SEACC supports issuing a new public notice and restarting the HSF RMA amendment process with a clear, inclusive scoping phase. At a minimum, the State should:

- Issue fresh notice that explicitly identifies the scope of proposed changes (forest-wide commercial timber across all designations, new AAC, carbon offset provisions, and revised SUD implementation) and the legal authorities at stake (AS 41.15.300–.330; AS 41.17.010–.230; relevant parts of AS 38.04, AS 38.05, and Article VIII of the Alaska Constitution).⁵¹
- Schedule a series of early-stage scoping meetings *before* drafting a new amendment, with at least:
 - One individual workshop with each of the advisory committee and local community, including but not limited to: government-to-government consultation invitations to the Chilkat Indian Village, Chilkoot Indian

⁴⁹ AS 41.15.310–.320

⁵⁰ "State seeks to expand logging in Haines State Forest, some question economics," *Chilkat Valley News*.

⁵¹ AS 41.15.300–.330; AS 41.17.010–.230; Alaska Const. art. VIII.



Association, the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagle Preserve Advisory Committee;⁵²

- Public listening sessions in Haines and Klukwan that present multiple conceptual management options (e.g., status quo subunit-based approach; limited expansion of timber into selected units; more conservative AAC; enhanced habitat designations), rather than a single preferred direction;⁵³

2. Re-evaluate core assumptions about multiple use, sustained yield, and unit-level designations

SEACC recommends revisiting the decision to identify commercial timber across all land designations and instead returning to or refining the previous unit-based approach:

- Maintain or strengthen Wildlife Habitat and Public Recreation designations in areas where habitat, scenic, and recreation values are primary, and clearly explain where timber is incompatible and why, as required by AS 41.17.230(a).⁵⁴
- Re-calculate sustained yield using local growth data and sensitivity analyses that explicitly account for Haines climate conditions, and provide side-by-side comparison of 120-year versus 300-year rotations and their implications for future harvest opportunities and habitat.⁵⁵
 - The State needs to reconcile and demonstrate whether it has failed its constitutional mandate to manage its lands for sustained yield given the need to expand its access base for larger volume access.
- Demonstrate, with maps and quantitative analysis, how the revised plan meets FRPA's multiple-use standards at both forest and unit scales, including:
 - Proportion of each unit reserved as functional wildlife habitat (with attention to goats, bears, salmon, and eagles);
 - Areas where traditional and subsistence uses are prioritized;
 - Scenic corridors and viewsheds (e.g., along Haines Highway, Chilkat Inlet, and Chilkoot Lake).⁵⁶

3. Formalize a consultation framework that goes beyond minimum notice

⁵² AS 41.15.310

⁵³ Haines State Forest Plan, ch. 1, "Plan Implementation" and "Modification of the Plan."

⁵⁴ AS 41.17.230(a); Haines State Forest Plan ch. 3–4

⁵⁵ "State seeks to expand logging in Haines State Forest, some question economics," *Chilkat Valley News*; Haines State Forest Plan ch. 2.

⁵⁶ Haines State Forest Plan, maps and unit policies.



To align practice with AS 41.15.310–.320 and AS 41.17.055(e), the State should:

- Adopt, within the HSF RMA plan, a standing consultation protocol specifying:
 - At what stages in plan amendments, Five-Year Timber Schedules, and FLUPs that CIV, CIA, the Upper Lynn Canal Fish and Game AC, the Bald Eagle Preserve AC, Borough, and the public will be engaged;
 - Minimum review time frames and information that will be provided (e.g., maps, growth assumptions, economic analysis, habitat modeling);
 - How DNR will document and respond to substantive comments, including any disagreements with ADF&G or DEC and how “due deference” was applied.⁵⁷
- Commit to at least annual joint meetings between DFFP, ADF&G, DEC, the Borough, and advisory bodies focused on HSF RMA implementation, with public participation.⁵⁸

4. Integrate economic and climate reality into management goals

The *Chilkat Valley News* reporting on Baby Brown and Chilkat Ridge underscores that roadbuilding, log transport, and market constraints limit the feasibility of large-scale export logging in the Haines State Forest.⁵⁹ SEACC recommends that the revised plan:

- Reorient timber management away from large, speculative export-oriented sales and toward locally scaled opportunities that meet community needs (for example, firewood, house logs, and small-mill supply) and lower-impact treatments, in keeping with FRPA’s direction to support the continuation of businesses and lifestyles that depend on forest resources (AS 41.17.060(c)(3)).⁶⁰ Require any economic assessment to fully account for infrastructure and administrative costs (including roads and transport to any LTF) and to evaluate effects on subsistence harvests as a reduction in local economic inflows, recognizing subsistence use as a form of non-cash household income that may be diminished by timber activities.
- Explicitly recognize climate-driven changes in growth rates, hydrology, and landslide risk in the Chilkat and Tsirku basins, and integrate these into AAC, road location standards, and riparian protections.⁶¹

⁵⁷ AS 41.17.055(e); AS 41.17.098; Haines State Forest Plan ch. 4.

⁵⁸ AS 41.17.047(d); Haines State Forest Plan ch. 1, 4.

⁵⁹ “State seeks to expand logging in Haines State Forest, some question economics,” *Chilkat Valley News*.

⁶⁰ AS 41.17.060(c)(3); *Chilkat Valley News*

⁶¹ Haines State Forest Plan, ch. 2 (waters, timber, forest protection)

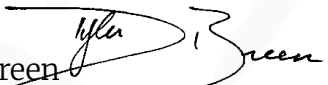


Conclusion

The Haines State Forest Resource Management Area is governed by a robust legal framework that requires DNR and DFFP to balance timber with fish, wildlife, traditional uses, recreation, and community well-being under multiple-use and sustained-yield principles, while engaging local advisory bodies and the public in a meaningful way.⁶² The 2026 draft amendment, as written and as developed, does not demonstrate that it meets those obligations for the HSF RMA's unique landscape and communities.

SEACC notes that to procedurally comply with the existing regulatory framework, the State should withdraw the current draft amendment, issue new notice, and undergo the scoping process collaboratively with the Upper Lynn Canal Fish and Game Advisory Committee, the Chilkat Bald Eagle Preserve Advisory Committee, the Borough, tribal governments, and the public to develop a revised plan that reflects the statutory purpose of the HSF RMA and the constitutional mandate to manage Alaska's resources for the maximum benefit of its people.⁶³

Thank you,


Tyler Breen
Policy Analyst
Southeast Alaska Conservation Council

⁶² AS 41.15.300-.320; AS 41.17.010-.230; Alaska Const. art. VIII.

⁶³ Ibid

From: lorismithrdh@aol.com
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Cc: msmithmd@aol.com; lorismithrdh@aol.com
Subject: Support for Haines State Forestry Plan
Date: Friday, June 5, 2026 4:45:10 PM

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Dear Division of Forestry Planner,

I am writting to express my strong support for Haines State Forestry Management Plan currently under consideration by the Division of Forestry & Fire Protection.

I have seen first hand the positive impact this Forestry Plan can have on my community.

My father, Ed Lapeyri was in the Logging Industry in the 70's until the early 90's, here in Southeast Alaska, where he managed/owned sawmills in both Haines and Petersburg. These communities were thriving during those years with several new small businesses, young families and the school enrollment skyrocketed in these small towns were I attend school.

I support the Forest Management Plan not only as a possible economic boost to our community, but to also to address the disease issues in our older growth areas, the increased access to areas for fire prevention and the recreation opportunities especially for our for aging population.

I respectfully urge the State Forestry Division to move forward with the Haines State Forestry Management Plan. I am confidant it will bring lasting benifits to our community and the state as a whole.

Sincerely,

Lori Lapeyri-Smith
President Chilkoot Lumber Company

From: [MarkS](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Comments, Haines State Forest Management Plan Amendment
Date: Friday, June 5, 2026 8:23:00 AM
Attachments: [Mark Sogge HSF Comment Final.docx](#)

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Attached are my personal comments on the draft Haines State Forest Management Plan Amendment.

Please let me know that these comments have been received and also where I will be able to access all submitted comments on this plan.

Thank you,
Mark Sogge

June 5, 2026

Mark Sogge



Jeremy Douse, State Forester
Alaska Division of Forestry and Fire Protection
Geneva Preston, Forest Planner
Greg Palmieri, Area Forester, Haines
Submitted by email to: dnr.dof.haines@alaska.gov

Re: Personal Comment on the 2026 Draft Haines State Forest Resource Management Area Management Plan Amendment

Dear State Forester Douse, Planner Preston, and Forester Palmieri:

I am writing as a resident of Haines, Alaska, and as someone who has spent most of his professional and personal life in the surrounding watersheds. I want to be clear at the outset that this letter represents my own views, not those of any organization. I am a member of the Upper Lynn Canal Fish and Game Advisory Committee and serve as board president of the Takshanuk Watershed Council. I spent many years as the manager of Upper Lynn Canal commercial fisheries for the State of Alaska, I am a former commercial gillnet fisherman, and I am a fisheries biologist and aquatic habitat restoration specialist. I have also hunted, fished, and gathered food in the Chilkat and Chilkoot valleys my entire adult life.

What Makes This Forest Exceptional

The Chilkat and Chilkoot watersheds are, by any objective ecological measure, exceptional. Except for the industrial-scale logging that occurred in the 1960s and 1970s — the effects of which are still visible today in clearcuts that have not recovered to productive forest even after 60+ years — these valleys remain largely intact. Most of the salmon runs here are healthy. The reason they are healthy is straightforward: the habitat has not been destroyed and the fish have been managed for sustainability. The Chilkat River supports a large run of late-season chum salmon, draws the largest concentration of bald eagles on earth, and produces significant runs of all five Pacific salmon species. The Chilkoot system supports important sockeye, pink, and coho runs, as well as smaller runs of chum and Chinook. The Klehini and Kelsall drainages historically supported the most productive Chinook spawning in the Upper Lynn Canal.

As has been proven repeatedly in the Pacific Northwest, salmon runs do not persist in degraded watersheds. They persist here because enough of the forest is still standing, the riparian zones are still largely intact, the streams still run cold and clear, and the large woody debris that creates the complex instream habitat salmon need is still being recruited from streamside trees. That is not an accident. It is the result of decades of relatively conservative management. This new plan puts all of that at risk.

The Community Was Not Meaningfully Consulted

I participated in the planning process and I want to be straightforward about what I observed. The Division of Forest and Fire Protection (DFFP) began developing this plan in early 2024. Local advisory bodies, including the Upper Lynn Canal Fish and Game Advisory Committee, were not contacted for formal consultation until January 2026, nearly two years into the process. By then, as DFFP's own scoping documents make clear, the fundamental policy direction had already been set: all lands previously protected from commercial timber harvest, including those designated as Fish and Wildlife Habitat, would be opened to logging as a secondary use. We were asked to weigh in on how that decision would be implemented, not on whether it was the right decision.

That is not consultation. It is notification. Alaska law requires the DFFP to consult with local fish and game advisory committees in the development of forest management plans, a process in which local input can actually shape outcomes. I understand that DFFP was operating under direction from the Commissioner of the Department of Natural Resources and was therefore constrained in what it could change. But genuine consultation should happen before direction is set, not after. The people of Haines and Klukwan, who live with the consequences of these decisions, deserved that opportunity. The overwhelming response from this community has been opposition to the plan as drafted, and that opposition is not reflected in the final product.

This Is Not What Multiple Use Means

Alaska's multiple-use management framework exists precisely to prevent any single use from dominating public land at the expense of all others. The 2002 Management Plan honored that principle by setting aside roughly half the Forest's spruce-hemlock stands, areas more valuable for fish habitat, wildlife, recreation, and subsistence than for timber, where commercial harvest was not permitted.

The 2026 plan eliminates that balance. It makes commercial timber harvest a permissible secondary use across the entire Forest, every acre, every land classification, nearly doubling the commercial timber base and more than doubling the Annual Allowable Cut. Alaska's multiple-use statute is explicit that management should give consideration to the relative values of all resources, and should not pursue the combination of uses that simply gives the greatest dollar return or the greatest unit output. DFFP's own scoping documents confirm that this plan was driven by an administrative directive to support the statewide timber industry. Maximizing timber availability across the entire forest is not multiple use; it is timber management with other labels attached.

I am also concerned that while the plan retains Wildlife Habitat and Recreation as "primary" classifications for previously protected lands, it provides no standard for determining when a proposed timber sale would be consistent or inconsistent with those designations. If a primary classification means anything, there must be some basis on which a proposed sale could be found incompatible with it. The plan provides none, which means those classifications offer nominal protection rather than real protection. I would ask the DFFP to develop and publish a clear compatibility standard before any timber sales are proposed in previously protected areas.

There is a straightforward alternative worth considering: rather than opening all protected lands to commercial harvest, DFFP could retain the 2002 plan's protections while permitting small,

ecologically justified forest treatments in Wildlife Habitat and Recreation lands for fire management or habitat restoration purposes only. That approach would honor the intent of multiple-use management and the Forest's established ecological values without foreclosing timber opportunity in the areas already available for harvest.

The Timber Inventory and Rotation Age Are Not Grounded in Local Science

As someone who knows this forest well, I want to flag a concern about the scientific basis for this plan that deserves serious attention. The 2026 plan projects future timber volumes using growth models calibrated for more productive temperate rainforests to the south, forests where conditions are wetter, warmer, and far more favorable for rapid tree growth. The Chilkat Valley is not that kind of forest. It is a transitional sub-boreal system where deep snowpack and cold temperatures suppress tree growth for roughly half of every year.

Anyone who has walked through the upper valley has seen 60-year-old clearcuts that are still dominated by alder and devil's club, with scattered, suppressed spruce nowhere near merchantable timber size. Those stands are not going to become productive commercial forest in the next 60 years, regardless of what a growth model projects. The plan's 120-year rotation age and Annual Allowable Cut (AAC) are both based on volume projections that I believe significantly overestimate what this forest can produce in that time period. If the inventory is inflated, the AAC is inflated, and the plan is promising timber yields this forest cannot deliver without being cut faster than it can grow.

I would respectfully ask DFFP to commission an independent review of the growth model assumptions used in this plan before it is finalized. The stakes, for the forest, for the fish, and for the timber industry itself, are too high to get this wrong.

The Economics of Large-Scale Commercial Logging Here Do Not Add Up

I have followed the economics of timber harvest in Southeast Alaska for many years, and the record is not encouraging. Even in the Tongass National Forest, where timber quality and volumes are substantially higher than in the Chilkat Valley, the U.S. Forest Service has consistently lost money on timber sales, averaging \$30 million per year in losses from FY1999 to FY2018. When timber harvest declined in the Tongass, so did the annual losses. State forests face the same structural challenges, and the Haines State Forest (HSF) has the added disadvantage of lower-quality, lower-volume timber and significant distance from markets.

I have heard local loggers say plainly that moving low-grade wood to a market and making any profit is essentially impossible. DFFP's own area forester has acknowledged that timber here is lower quality and lower volume than the southern Southeast forests that once supported a regional industry. Against that backdrop, the argument for more than doubling the harvest level makes little economic sense.

Meanwhile, the economic value of an intact HSF is substantial and largely unaccounted for in this plan. Commercial salmon fisheries in the Lynn Canal generate significant revenue for local fishermen and the broader Alaska economy. Sport fishing, hunting, and nature-based tourism are growing industries here. The Chilkat Bald Eagle Preserve draws visitors from around the world, and the Forest is part of what makes that experience possible. Carbon offset management, done properly, could potentially generate more per acre than timber harvest while leaving the forest

intact. None of this appears in the plan's analysis, because the plan contains no comparative economic analysis of timber versus non-timber values. That is a serious omission that I believe the DFFP should correct before the plan is adopted.

Absence of Environmental Baseline and Impact Analysis

The 2026 plan proposes to reverse protections on approximately 32,000 acres of previously protected Wildlife Habitat and Public Recreation lands without providing any environmental baseline analysis or assessment of anticipated impacts. The draft contains no evaluation of projected effects on water quality, fish habitat, soil stability, wildlife movement, or anadromous stream productivity. A change of this magnitude, nearly doubling the area open to commercial harvest, requires documented analysis of environmental consequences before adoption, not after. The plan's silence on these questions is not a minor procedural gap; it is a substantive failure to demonstrate that the proposed direction is consistent with Alaska's sustained yield and multiple-use management obligations.

Unit-Specific Concerns

Unit 1, Subunits 1a and 1c — Kelsall River. The Kelsall once supported the most productive Chinook salmon run in the Upper Lynn Canal — the largest Chinook spawning population in the area, as the 2002 plan recognized. That run has collapsed. The collapse tracks closely with the logging and road construction that occurred there over decades. As a fisheries biologist I am careful about asserting causation, but the correlation is striking and the mechanism is well understood: roads and clearcuts increase sedimentation, raise stream temperatures, reduce large woody debris recruitment, and degrade the precise instream conditions Chinook need to spawn and rear successfully. The 2026 plan proposes to extend the road system in the Kelsall and designate more of the watershed for commercial harvest. That is exactly backwards. The Kelsall needs restoration, not more logging. At minimum, no new roads or sales should be proposed in this watershed until ADF&G has assessed the current status of the Chinook run and identified what habitat recovery would require.

Unit 3, Subunits 3b and 3d — The Klehini River Floodplain and Big Boulder Creek. The Klehini is a dynamic, actively migrating river whose salmon productivity depends on intact riparian vegetation, large woody debris, and the ability of the channel to shift and create new habitat over time. Any timber harvest within the floodplain has the potential to significantly alter river dynamics and thus spawning and rearing habitat. No logging should occur within the floodplain. Big Boulder Creek, which drains into the Klehini, supports important Chinook spawning and is not adequately protected under the 2026 plan. The watershed contains very steep and unstable slopes, making it particularly vulnerable to road-related erosion and sedimentation. Given the creek's value as salmon habitat, no logging should occur in this watershed.

Unit 3, Subunit 3g — Little Salmon River. I grew up hunting and fishing in this area and spent considerable time here as an ADF&G fisheries biologist, assessing salmon spawning habitat throughout the drainage. The Little Salmon River and its tributaries support productive salmon habitat that is largely intact and undisturbed. Commercial timber harvest should be prohibited in this Wildlife Habitat unit, consistent with the 2002 plan's approach. The combination of fish values and intact old-growth forest here makes this one of the units where the cost of opening to harvest most clearly exceeds any potential timber benefit.

Unit 4, Subunits 4a and 4b — Chilkat Lake and Chilkat Ridge. Chilkat Ridge (Subunit 4b) contains some of the last remaining large-tree old-growth spruce in the HSF. These are the most ecologically complex, most carbon-dense, and most wildlife-productive stands in the Forest, and they border the Alaska Chilkat Bald Eagle Preserve's Council Grounds, the most critical eagle habitat in the Preserve. Logging Chilkat Ridge would be irreversible on any human timescale and should not be permitted. In Subunit 4a, commercial timber harvest would increase the risk that the Tsirku River avulses into Chilkat Lake, threatening one of the Forest's most productive sockeye spawning and rearing areas. No timber harvest should be allowed in the Tsirku River floodplain, and I would ask the DFFP to commission a hydrological assessment of avulsion risk before any sale is proposed anywhere in Subunit 4a.

Unit 5 — Takhin/Kicking Horse. This unit is one of the most popular moose and bear hunting areas in the valley, contains numerous anadromous streams, and borders the reach of the Chilkat River that supports the eulachon spawning run, one of the last large healthy eulachon runs in North America. It is also important spring staging habitat for migratory birds that stop near the mouth of the Chilkat to feed on eulachon before continuing inland. The 2002 plan's prohibition on commercial timber harvest in this Wildlife Habitat unit should be retained. Logging and road-building here will cause irreparable damage to the area's natural productivity and to its long-established use as a hunting area.

Unit 6, Subunits 6a and 6b — Chilkat Inlet. I have lived on the Chilkat Peninsula since 1969. This unit is within my viewshed and the viewshed of numerous other homes in the area. I have hunted, sport fished, subsistence fished, commercial fished, and recreated along its shores and in its forests throughout my life. This is a wild area with patchy forest, steep terrain, and numerous active landslide paths. Timber harvest and road-building in Subunit 6a would be visible from homes throughout Chilkat Inlet and from the water, directly undermining the tourism and property values the area supports. Subunit 6b borders a high-value tourism development and numerous private cabins. Even small-scale logging in these areas would be in direct conflict with the other, more valuable uses of this unit.

Unit 8, Subunits 8a, 8b, and 8d — Chilkoot River and Lake. Chilkoot Lake supports one of the two significant sockeye salmon populations in the entire Forest and has failed to meet escapement goals in recent years, a signal that this watershed is already under stress. The drainage also supports subsistence, commercial, and sport fisheries and a nature tourism economy that depends on an intact, functioning ecosystem. All three previously protected subunits are now open to commercial harvest under the 2026 plan. Logging within this unit will cause damage to all of these uses and should be prohibited, as it was under the 2002 plan. I ask that before any sale is proposed here, the DFFP consult with ADF&G on the status of the Chilkoot sockeye run and assess whether harvest activity could impair the lake's ability to recover to historic escapement levels.

What I Am Asking For

I am not asking the DFFP to abandon timber management in the Haines State Forest. Carefully designed, small-scale local harvest, the kind that supports local mills, produces house logs and firewood for community use, and is calibrated to what this forest can sustainably provide, is entirely appropriate and worth supporting. What I am asking is that the DFFP step back from a plan that treats this entire landscape as a timber inventory and consider what it would look like to manage it for everything it is.

Specifically, I ask that the DFFP:

- Protect all remaining old-growth forest from commercial harvest. These stands cannot be replaced, and their ecological and economic value as intact forest exceeds their value as timber.
- Commission an independent review of the growth model and regeneration assumptions underlying the plan's Annual Allowable Cut, using data specific to the Chilkat Valley's climate and growing conditions.
- Conduct a meaningful comparative economic analysis of timber versus non-timber values, including commercial fisheries, sport fishing, tourism, subsistence, and carbon sequestration, before the plan is finalized.
- Close the Kelsall River watershed to further large-scale road-building and commercial harvest, and develop a restoration plan for that watershed in coordination with ADF&G.
- Develop and publish a clear standard for evaluating proposed timber sales in Wildlife Habitat and Recreation classified units for consistency with those primary designations, before any sale is proposed in previously protected areas.
- Conduct a watershed-scale cumulative impacts assessment for the Chilkat, Chilkoot, and Ferebee drainages.
- Extend riparian buffers to uncatalogued tributaries of anadromous streams within any area subject to timber harvest.
- Prohibit commercial timber harvest on Chilkat Ridge, within the Kelsall watershed, within the Chilkoot drainage, and within other areas listed in this letter.

I have spent my career trying to protect and restore the aquatic habitat that makes this part of Alaska remarkable. The Chilkat and Chilkoot watersheds are among the most productive and least disturbed salmon systems remaining in Southeast Alaska. That is not a coincidence — it is the product of decades of relatively careful stewardship. This plan, as written, puts that legacy at risk in ways that I do not believe can be undone.

I am asking the Division of Fire and Forest Protection to do better. I believe it can. And I am willing to contribute whatever expertise I have to help find management approaches that work for the forest, for the fish, and for the people who depend on both.

Thank you for taking the time to read these comments.

Sincerely,

Mark Sogge

Haines, Alaska

Member, Upper Lynn Canal Fish and Game Advisory Committee

Board President, Takshanuk Watershed Council

Former Manager, Upper Lynn Canal Commercial Fisheries, ADF&G

From: [Nicholas Szatkowski](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: Fwd: Comments on Alaska DNR/DoF's Haines State Forest Management Area Management Plan Amendment, with Particular Focus on Regrowth Prediction Inaccuracies.
Date: Friday, June 5, 2026 5:18:04 PM

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From: Nicholas Szatkowski <[REDACTED]>
Date: Fri, Jun 5, 2026 at 5:11 PM
Subject: Comments on Alaska DNR/DoF's Haines State Forest Management Area Management Plan Amendment, with Particular Focus on Regrowth Prediction Inaccuracies.
To:
Cc: <greg.palmieri@alaska.gov>, Kimberley Strong <kstrong@chilkat-nsn.gov>, Brian Willard <bwillard@chilkat-nsn.gov>, Tom Morphet <tmorphet@haines.ak.us>, <senator.Jesse.Kiehl@akleg.gov>, <Representative.Andi.Story@akleg.gov>

Comments on Alaska DNR/DoF's Haines State Forest Management Area Management Plan Amendment, with Particular Focus on Regrowth Prediction Inaccuracies.

The DoF's forest regrowth predictions for the Haines State Forest Management Area are wildly inaccurate. DoF has not provided clear evidence supporting the exaggerated regrowth calculations. Without a clear understanding of actual regrowth rates, patterns, and variables on the HSFMA, it isn't possible to calculate an AAC that is consistent with the regulatory and AK Constitutional requirements for sustained yield. This means that, until the fundamental inadequacies in regrowth calculations are resolved, the DoF/HSF cannot proceed with any logging sales or prescriptions without violating the regulatory requirement for Multiple Use. This is because it isn't possible to assess relative gains or impacts of industrial logging to different uses and values of the forest if the true nature of regrowth on the HSFMA isn't clearly understood and communicated to the public. The DoF's failure to communicate a clear understanding of forest regrowth in the Chilkat Valley, with appropriate evidence, also means that it is currently impossible for DNR/DoF to demonstrate that any removal of existing forest acreage would actually be in the best economic interest of the Alaskan public. The long-term impacts to forest ecosystem dynamics can't be properly understood or assessed while the DoF remains incapable of accurately describing the actual parameters and characteristics of forest regrowth in the unique climate and unique set of forest dynamics in the Chilkat Valley.

If the DNR/DoF proceeds with authorization of industrial logging under the guidance of the current Management Plan (including the Plan Amendment), the agency would

likely be committing at least 3 regulatory violations, as described in the paragraph above.

The following letter is one that I submitted 4 years ago, as a comment on the 2022 HSF 5-Year Forest Schedule. Sadly, all of the problems I described with the DoF's inaccurate and confused regrowth predictions remain the same today. Therefore, I am submitting this letter today, to again describe how vastly wrong and incomplete the DoF's regrowth predictions currently are for the HSFMA.

The problems with HSF's regrowth predictions are multiple, and complex. I'll describe one area in detail here, to show by example how enormously false the HSF regrowth predictions are. This particular area comprises 275 acres of HSF lands that are between the lower Klehini and Little Salmon Rivers. The area is immediately adjacent to my own private property, where I've lived for over 20 years, and I know it well.

The Alaska DoF GIS Forest Inventory records this area as having been clearcut in 1968, and currently holding 5,753 boardfeet/acre, presumably in spruce and/or hemlock regrown since 1968. No inventory data indicates any variation in harvest method, regrowth, or any other variable across this fairly large cutback.

The on-the-ground reality, however, is that the intensity and location of logging was extremely variable across this 275 acres. Some areas were indeed clearcut; these have regrown almost entirely with black cottonwood (*Populus balsamifera* *trichocarpa*), and after 50 years of regrowth, have almost no merchantable boardfeet of spruce or hemlock. Other, small portions of the 275 acres that are on relatively steep slopes were unlogged and support remnant old-growth spruce and hemlock trees of considerable size (these trees shouldn't be calculated into the regrowth volume, since they existed before the recorded 1968 logging date; any additional growth of these individual trees since that time would be impossible to count, and would be negligible according to the industrial forestry premise that old trees add very little volume per year).

The westernmost portion (about 70 acres) of this 275 acre polygon, closest to existing private land, was actually not clearcut, but was high-graded. Individual large trees were selectively taken out from this section, but no records were kept by the State, and natural decomposition has obscured evidence of the age, number and species of the individual trees removed. The majority of the forest, however, was left intact, and after 50 years, this portion of the 275 acres had developed into a healthy, biodiverse, mature forest, with numerous old-growth characteristics, and many large trees well

over 100 years of age.

HSF offered small sales in this area, and in 2018 a local operator clearcut a 9-10 acre cutblock, removing all of the large spruce and hemlock which amounted to about 80-90,000 boardfeet. In 2019, the same local operator logged an adjacent 9-10 acre parcel, removing a similar volume of timber. (These cutblock sizes and timber volume numbers are from a personal conversation with Mr. Palmieri in Fall of 2019). So this particular area supported a mature, uneven-aged, mixed species forest that yielded approximately 9,000 boardfeet/acre when logged in 2018 and 2019. Many of the spruce trees removed were 120-150 years old (I've counted

rings on stumps). Exactly 50-51 years after the recorded 1968 clearcut date, this area supported about 9,000 boardfeet/acre, *virtually all in trees that were left behind during the selective logging*. The HSF inventory shows none of this detail: not the variation in logging methods, not the presence of 70 acres of mature, 120 year-old forest, and it does not show a record of the logging which occurred there in 2018 and 2019, nor the timber volume removed from our public lands at these dates. Instead the DoF GIS Forest Inventory shows the entire 275 acre area as having been clearcut in 1968, and currently holding 5,753 boardfeet/ acre. This was incorrect information before the 2018/2019 logging, and is obviously incorrect now.

(Incidentally, the Forest Inventory shows the exact same timber volume (5,753 bf/ acre) for every individual, previously logged area within the entire Haines State Forest, regardless of whether the parcel in question was logged 60 years ago or 10 years ago!!!)

Table 9 (Strata 5 Growth Simulation) of the 2020 (unadopted) HSF Forest Inventory shows the HSF's projection of cumulative second-growth timber volumes on lands that will have regrown after being clearcut under the HSF FYFMS. Row 5 shows that, at 51 years after clearcutting, HSF predicts all second- growth to *average* 9,422 boardfeet/acre. No recognition is given of variable growing conditions across the HSF, throughout the myriad of microclimates found across the Chilkat Valley. This projected timber volume is almost exactly the amount of timber removed from the area that I've described above. The critical difference is that the area in question wasn't clearcut 51 years previously, it was selectively logged, and virtually all of the timber removed was already standing timber in 1968, much of it 50 years old or more at that time! The HSF's contention that a completely clearcut area would have regrown to produce the same amount of timber volume as that selectively-logged areas with 120+ year-old trees is preposterous, illogical, and completely out-of-step

with actual forest dynamics in the Chilkat Valley.

In fact, on-the-ground surveys of actual clearcuts conducted 40-50 years ago reveal mainly 2 patterns: either (1) dense cottonwood/poplar doghair, extremely unsuitable for conifer seedling growth; or (2) shrub fields, with scattered conifers mostly under 15 feet in height. Any sites that might show more uniform, abundant conifer growth are exceptions, and untypical without extensive, repeated pruning, thinning, and removal of deciduous species

The HSF FYFMS shows no awareness of the actual patterns of vegetative growth/regrowth under the particular conditions that occur on the land base of the HSF. Due to its unique geography, the Chilkat Valley has a transitional climate between the climates of the boreal/subarctic interior, and the temperate coast, and also acts as a natural biological corridor between these two much larger biomes. The result is that forests in the Chilkat Valley have a much larger deciduous component

(primarily poplar and birch, along with willow, maple, and alder) than do forest in the actual temperate rainforests. There is also a very robust understory of deciduous shrubs such as highbush cranberry, prickly rose (*rosa acicularis*) and others. What this means is that clearcut areas regrow vigorously with deciduous shrubs and trees, which significantly limits restocking with conifer seedlings. In addition, compared to the temperate rainforest of Southeast AK and BC, the Chilkat Valley is both drier, especially in Spring and Summer, and yet has a vastly heavier snowpack in winter. Both of these climatic factors put additional stress and limitations on conifer seedling germination and growth. Additionally, because of the transitional position between two larger climate areas, the weather in the Chilkat can vary drastically from one year to another. Seedlings might have sufficient moisture to germinate in one year, and then dry out and die during the next summer. Or alternatively, they might be crushed and killed by an anomalously high snowpack (even on the valley bottom, the annual cumulative snowfall can vary from 15 feet to more than 30 feet).

The fact is that the Chilkat Valley is a difficult climate for conifer seedlings to become established and grow consistently. Under the right conditions, once conifers finally achieve a size to reach above the annual snowpack (this often takes 30 years or more for the first 12-15 feet of growth) they can grow moderately well. But the forests here just take a much longer time to grow large conifers. It is not an ideal place for timber production.

However, all of these conditions do contribute to the unique ecology of the Chilkat

Valley. The rare, transitional climate provides a refuge between the climates of the coast and interior, which are each extreme in different ways. The result is that the Chilkat is a sort of “Goldilocks” valley (not too dry, not too wet; not too cold, not too warm), and consequently, an array of plant species occur here that are either very rare or absent in the rest of Alaska (*Chimaphila umbellata*, “pipsissewa”; *Cypripedium montanum*, “mountain lady slipper”; *Collinsia parviflora*, “small- flowered blue-eyed Mary”; *Phacelia sericea* “silky phacelia”; *Phyllodoce empetriformis*, “pink mountain heather”; and others). In addition, the Chilkat Valley is the only valley in Alaska containing extensive Lodgepole Pine/Paper Birch parklands; it is the only portion of Southeast Alaska known to have an established, abundant Lynx/Snowshoe Hare ecological system; the Mountain Goats here have been found to have more genetic variability than does the rest of the species throughout its range, from South-central AK to the lower 48. Also, valleys immediately NE and SW of the Chilkat were found to have the greatest abundance of lichen species per unit/area of anywhere in the world. Lichen researchers referred to this region in publications as “The Amazon of the lichen world” due to the superlative lichen biodiversity.

The Haines State Forest shows no indication that they are aware of the global biodiversity crisis, nor of how the remarkably biodiverse Chilkat Valley holds

potential to beneficially contribute to this issue. HSF management indicates no priority on conserving the particular values present in old-growth forests and other old ecological communities. No efforts are detailed or described for the maintenance of forest connectivity, or mature forest structures, across the landscape. No significant recognition is given of species that are rare, sensitive, forest-dependent, or vulnerable to habitat disturbance, even though many such species exist here in the Chilkat Valley. Numerous species here are directly dependent on contiguous old-growth or mature forest habitat, yet the HSF apparently expends zero effort seeking to manage the public lands in its care so as to maintain the necessary conditions for such forest-dependent species.

It is clear that the HSF has been using a vastly inflated regrowth projection to justify a vastly inflated annual allowable cut. It is mathematically evident that following the directives of the HSF FYFMS, and the 2002 HSF Management Plan, will result in an irrecoverably damaged forest ecosystem in the Chilkat Valley.

All clearcutting of old-growth forest should be halted on the HSF; too much has been removed already, and some portions of the valley forests have been excessively fragmented.

It is the legal responsibility of the HSF to manage for sustained yield of *all resources* on the land base (and water). Excessive old-growth logging has already begun to damage other values. Biodiversity. Recreation. Spiritual solace and rejuvenation. Wildcrafting and non-timber harvesting. And especially managing the HSF to support the vital salmon runs that run through it.

The overwhelming majority of local residents use the forest landscape for other purposes. These other values are worth more in the long run, and ethically and legally must be preserved for future Alaskans.

thank you,

Nicholas Szatkowski
Little Salmon River, Alaska

From: [Derek Poinsette](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Cc: [Preston, Geneva S \(DNR\)](#); [Palmieri, Greg J \(DNR\)](#); [Kimberley Strong](#); [Brian Willard](#); [Harriet Brouillette](#); [Thomas Morphet](#); [gthomas@haines.ak.us](#); [msmith@haines.ak.us](#); [Cheryl Stickler](#); [kforster@haines.ak.us](#); [esargent@haines.ak.us](#); [dloomis@haines.ak.us](#); [dpoinsette@haines.ak.us](#); [pbrown@haines.ak.us](#); [rsaitzyk@haines.ak.us](#); [nreams@haines.ak.us](#); [dschultz@haines.ak.us](#); [ilapp@haines.ak.us](#); [Aleka Fullerton](#); [Chen Wu](#); [Garasky, Brad A \(DNR\)](#); [Kanouse, Kate M \(DFG\)](#); [Zeiser, Nicole L \(DFG\)](#); [Manninen, Hannah B \(DFG\)](#); [Commissioner, DNR \(DNR sponsored\)](#); [Senator.Jesse.Kiehl@akleg.gov](#); [Representative.Andi.Story@akleg.gov](#); [Senate.Resources@akleg.gov](#); [Douse, Jeremy A \(DNR\)](#)
Subject: Public Comment — 2026 Draft HSFMA Management Plan Amendment
Date: Friday, June 5, 2026 9:58:12 AM
Attachments: [ULCAC HSF Public Comment Collaborative Final.pdf](#)

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Division of Forestry and Fire Protection,

Please find the attached comment letter from the Upper Lynn Canal Fish and Game Advisory Committee regarding the Division of Forestry and Fire Protection's draft Haines State Forest Management Plan Amendment.

Thank you,

Derek Poinsette, Secretary
Upper Lynn Canal Advisory Committee

CC:
Kimberley Strong, Chilkat Indian Village President
Brian Willard, Chilkat Indian Village Tribal Administrator
Harriet Brouillette, Chilkoot Indian Association Tribal Administrator
Haines Borough Mayor, Assembly, and Planning Commission
Haines Borough Manager and Planner
Brad Garasky, State Parks Superintendent
Kate Kanouse, ADFG Habitat
Nicole Zeiser, ADFG Commercial Fisheries
Hannah Manninen, ADFG Wildlife Conservation
DNR Commissioner's Office
Senator Jesse Kiehl
Representative Andi Story
Senate Resources Committee

UPPER LYNN CANAL FISH AND GAME ADVISORY COMMITTEE

Haines, Klukwan, and Skagway, Alaska

June 5, 2026

Jeremy Douse, State Forester

Alaska Division of Forestry and Fire Protection

Geneva Preston, Forest Planner

Greg Palmieri, Area Forester, Haines

Submitted by email to: dnr.dof.haines@alaska.gov

Re: Public Comment — 2026 Draft HSRMA Management Plan Amendment

Dear State Forester Douse, Planner Preston, and Forester Palmieri:

The Upper Lynn Canal Fish and Game Advisory Committee (ULCAC) submits this letter as formal public comment on the 2026 Draft Haines State Forest Resource Management Area (HSFRMA) Management Plan Amendment. One of the ULCAC's central responsibilities under Alaska law is to provide a local forum for fish and wildlife conservation and use, including matters relating to habitat. We take that responsibility seriously, and this letter reflects our genuine effort to fulfill it.

We want to say at the outset that we recognize the Division of Forestry and Fire Protection (DFFP) is operating under direction it received from the Commissioner of the Department of Natural Resources (DNR), and that DFFP staff have worked to engage the public and local interests during this process. We appreciate those efforts. Our concerns are not with the individuals involved but with several aspects of the 2026 draft plan that we believe would benefit from further attention before the plan is finalized. We remain committed to working constructively with the DFFP as this plan moves forward and as individual timber sales are proposed under it.

The ULCAC submitted letters on January 12, February 9, and March 26, 2026, and met with DFFP staff on March 12, 2026. This letter summarizes the recommendations we made in that correspondence and notes where the draft plan did and did not reflect them.

I. The ULCAC's Role in the Planning Process

Alaska Statute §41.15.310 identifies local fish and game advisory committees as important participants in the management of state forests, requiring the DFFP to consult with each committee with jurisdiction in the area. The ULCAC takes this role seriously and was glad to be included in the scoping process, even though our formal contact with the DFFP did not begin until January 2026, well into a planning process that had been underway since early 2024.

We understand that by the time we were consulted, the DFFP had already received direction to open Habitat and Recreation lands to timber harvest as a secondary use, and that the scoping process was focused on how that direction would be implemented rather than on whether it should be pursued. We recognize that placed real constraints on what could be changed through public comment. We raise this not to be critical of the DFFP's staff, but because we believe earlier and more open-ended engagement would have produced a stronger plan, one that reflected local knowledge and values from the beginning.

We hope that going forward, and particularly as individual timber sales are proposed in previously protected areas, the DFFP will engage the ULCAC early and meaningfully. We are committed to that partnership.

II. The Question of Balance Across the Forest

The 2002 Management Plan recognized that commercial timber harvest is not compatible with all of the uses intended for the Haines State Forest, and on that basis set aside approximately 47,000 acres, about half the Forest's spruce-hemlock stands, where timber harvest was not permitted, in recognition of their primary values for fish and wildlife habitat, recreation, and subsistence.

The 2026 draft plan changes that approach significantly. By making timber harvest a secondary use across all land designations, the plan expands the commercial timber base from 41,652 acres to 74,360 acres, a 78 percent increase, and raises the Annual Allowable Cut from 5.88 million board feet per year to 14.77 million board feet per year. We understand this reflects the DNR Commissioner's direction to more fully utilize the Forest's timber resources. Our concern is simply whether the right balance has been struck between timber and the other values the Forest supports: fish, wildlife, subsistence, recreation, and a growing tourism economy.

Alaska's multiple-use management principles call for harmonious and coordinated management of all resources, with consideration given to the relative values of each, and not necessarily the combination of uses that produces the greatest dollar return or the greatest unit output. The ULCAC believes the 2026 plan would be strengthened by a more explicit accounting of non-timber value, including what those values are worth economically and what effects expanded logging may have on them. For example, the Chilkat Bald Eagle Preserve Advisory Council has found that carbon offset management could generate \$1,300–\$1,400 per acre for the Forest, three to four times the estimated return from timber harvest, while remaining fully compatible with fish, wildlife, and recreation values. We think that kind of comparative information would help the DFFP, the public, and elected officials make well-informed decisions about the right level of harvest.

We also note that while the plan retains Habitat and Recreation as primary classifications for previously protected lands, it does not describe how proposed timber sales in those areas will be evaluated for consistency with those primary designations. Providing a clear standard for that evaluation, before individual sales are proposed, would give the public and local communities greater confidence that the primary classification means something in practice. We would welcome the opportunity to work with the DFFP on developing such a standard.

III. Forest-Wide Recommendations

The ULCAC's letters made a number of forest-wide recommendations. We summarize them below, along with our understanding of how the draft plan addresses each.

Old-Growth Forest Protection. We recommended defining old-growth forest in the HSF as stands free from logging for at least 200 years and prohibiting commercial harvest of such stands. Many large spruce remaining on the HSF are 300 years or older. These trees are the most carbon-dense, ecologically complex, and wildlife-productive stands in the Forest, and they cannot be replaced on any human timescale. The 2026 plan does not define old-growth or

establish any special protection for it. We continue to believe this is an important gap and encourage the DFFP to address it, at minimum, through harvest design standards for individual sales.

Clearcutting. We recommended moving away from even-age (clearcut) harvest methods and toward selective harvest that better maintains habitat connectivity, soil stability, and forest resilience. The 2026 plan retains clearcutting as the primary method in Forest-designated lands, with units up to 160 acres. We understand this reflects established practice and economic considerations. We ask that the DFFP consider, on a sale-by-sale basis, whether selective harvest methods could achieve timber objectives while reducing impacts to fish and wildlife habitat, particularly in areas adjacent to anadromous streams.

Forest Regeneration. We recommended that the DFFP commission studies on spruce-hemlock regeneration times specific to the HSF's climate and growing conditions. The current 120-year rotation age was derived from studies of forests farther south, and we are concerned it may not adequately reflect how long this particular forest takes to recover to ecological and commercial productivity. The 2026 plan retains the 120-year rotation without additional study. We encourage the DFFP to consider supporting Alaska-specific regeneration research as part of its ongoing management program.

Restoration. We recommended adding Restoration as a formal land-use category, with priority given to areas where past logging has caused lasting ecological harm. The most pressing need we identified is the Kelsall River watershed, which the 2002 plan recognized as the largest Chinook salmon spawning area in the Upper Lynn Canal and which has experienced a serious decline in productivity since that time. The 2026 plan does not include a restoration category. We ask the DFFP to consider how restoration objectives can be incorporated into future planning and sale design in degraded areas, particularly those with documented salmon habitat concerns.

Forest Connectivity and Cumulative Effects. We recommended that the plan address how forest connectivity and landscape-scale ecological function will be maintained as harvest expands into previously protected areas. The 2026 plan does not include a cumulative effects analysis or a connectivity discussion. We recognize this kind of analysis is complex and resource-intensive. We encourage the DFFP to develop a framework for evaluating cumulative watershed effects before harvest is proposed in sensitive areas, and we would be glad to participate in that process.

Watershed Monitoring. We recommended establishing a forest-wide monitoring program for habitat conditions in the Chilkat, Chilkoot, and Ferebee watersheds. No monitoring program is included in the draft. We believe monitoring is essential to responsible adaptive management — it allows the DFFP to detect problems early and adjust practices before serious harm occurs. We strongly encourage the DFFP to develop a monitoring framework, and we are willing to assist with data collection where we can.

Carbon Offset Programs. We support the development of carbon offset projects in the HSF and appreciate that the 2026 plan creates a pathway for them. We ask only that carbon projects not require the harvest of old-growth stands, which are the most carbon-dense and ecologically valuable forests in the HSF. Carbon offsets, tourism, fisheries, and subsistence uses are all compatible with an intact forest and with each other. We encourage the DFFP to prioritize these uses as a package when evaluating management options for specific areas.

Environmental Analysis. We recommended that the plan include an environmental baseline assessment and an analysis of anticipated impacts from the proposed expansion of the commercial timber base. The draft plan does not include this analysis. We understand that project-level environmental review will occur before individual sales are approved, and we appreciate that those safeguards exist. We continue to believe that a landscape-scale assessment of anticipated effects — on water quality, fish habitat, wildlife, and soil stability — would be a valuable addition to the plan document itself.

Anadromous Stream Buffers. We recommended extending the existing 300-foot Special Management Zone to include uncatalogued tributaries to catalogued anadromous streams. The 2026 plan retains the SMZ on catalogued streams, which we appreciate. However, given the density of salmon use throughout this valley, gaps in protection for uncatalogued tributaries remain a concern. We ask the DFFP to consider tributary protection on a sale-by-sale basis and to consult with ADF&G Habitat on each proposed sale in areas with uncatalogued streams.

IV. Unit-Specific Concerns

The ULCAC submitted detailed recommendations for specific units of the Forest based on our members' knowledge of local conditions. We summarize those concerns below. We recognize that not all of them could be accommodated given the overall direction of the plan, and we look forward to raising them again as individual sales are proposed.

Unit 1, Subunits 1a and 1c — Kelsall River: We asked that this watershed be closed to further large-scale road-building and managed for habitat restoration and recreation. The Kelsall once supported the largest Chinook salmon spawning population in the Upper Lynn Canal, and that run has declined significantly over the decades since industrial scale logging and road construction occurred there. The 2026 plan designates Subunit 1c as Forest land and proposes to extend the existing road system. We ask the DFFP to give careful consideration to salmon habitat recovery in this watershed before any new sales are proposed, and to consult with ADF&G on the status of the Kelsall Chinook salmon population.

Unit 2, Subunits 2a and 2b — East Chilkat River: We asked that this area be protected from large-scale logging to maintain fish and wildlife habitat and preserve access for hunters, trappers, and fishermen. The 2026 plan designates Subunit 2a as Resource Management and Subunit 2b as Forest, allowing commercial harvest in both. We ask that any proposed sales in this area include thorough evaluation of impacts to fish and wildlife habitat and traditional access.

Unit 3, Subunit 3b — Klehini Uplands/Big Boulder Creek: We asked that no harvest occur in areas that could affect Big Boulder Creek, which supports important Chinook spawning. The 2026 plan designates this subunit as Resource Management and allows commercial harvest without specific Big Boulder Creek protections. We ask the DFFP to recognize the importance of Big Boulder Creek and, given the steep terrain within the watershed of this creek, to consider widening the buffer protecting this catalogued anadromous stream.

Unit 3, Subunit 3d — Klehini River Flood Plain: We asked that the entire floodplain be excluded from even-age harvest because of the Klehini's dynamic, migrating nature and its dependence on large woody debris and intact riparian structure for salmon productivity. The 2026 plan retains a 20-acre limit on even-age harvest in this Wildlife Habitat subunit. We appreciate that some limit was retained and ask that sale design in this area reflect the floodplain's sensitivity.

Unit 3, Subunit 3g — Little Salmon River: We asked that commercial harvest be prohibited in this Wildlife Habitat area, which is known locally as prime fish and wildlife habitat. The 2002 plan did not allow commercial harvest here. The 2026 plan does. We ask that any proposed sale in this unit be preceded by careful review of fish and wildlife values with ADF&G.

Unit 3, Subunit 3h — Herman and Walker Lakes: We asked that commercial harvest remain prohibited in this popular backcountry recreation area. The 2026 plan allows harvest here and frames logging as a potential vehicle for recreation infrastructure development. We ask the DFFP to consult with the Haines community before any sale is proposed in this unit to ensure that recreation values are fully considered.

Unit 4, Subunits 4a and 4b — Chilkat Lake and Chilkat Ridge: We asked that all of Unit 4 remain closed to commercial harvest. Chilkat Ridge contains some of the last large-tree old-growth spruce in the HSF, borders the Bald Eagle Preserve's Council Grounds, and is an important Jilkáat Kwáan cultural heritage area. Harvest in Subunit 4a could increase the risk that the Tsirku River avulses into Chilkat Lake, one of the Forest's most productive sockeye spawning areas. The 2026 plan designates both subunits for commercial timber harvest. We ask the DFFP to commission a hydrological assessment of avulsion risk before any sale is proposed in Subunit 4a, and to consult with the communities of Haines and Klukwan before any sale is proposed in Subunit 4b.

Unit 5 — Takhin/Kicking Horse: We asked that the 2002 plan's prohibition on commercial harvest in this Wildlife Habitat unit be retained. This is one of the most popular moose and bear hunting areas in the valley, contains numerous anadromous streams, and borders the reach of the Chilkat River supporting the eulachon run — one of the last large healthy eulachon runs in North America. It is also important spring staging habitat for migratory birds that feed on eulachon before continuing inland. The 2026 plan allows commercial harvest here. We ask that any proposed sale give particular attention to eulachon habitat, migratory bird use, and hunting access.

Unit 6, Subunits 6a and 6b — Chilkat Inlet: We asked that this Public Recreation unit remain closed to commercial harvest. It supports an active tourism operation, hunting, fishing, and backcountry recreation as well as providing a backdrop for residential communities in Chilkat Inlet. The 2026 plan allows commercial harvest in both subunits. We ask the DFFP to consult with the tourism operator and the Haines community before any sale is proposed here, and to give careful consideration to the impacts on residential and recreation values.

Unit 8, Subunits 8a, 8b, and 8d — Chilkoot River and Lake: We asked that the entire Chilkoot watershed remain closed to commercial harvest. Chilkoot Lake supports one of the two significant sockeye populations in the entire Forest and the lake has failed to meet escapement goals in recent years, signaling a system already under stress. The watershed also supports subsistence, sport, and commercial fisheries and a high-value nature tourism economy. The 2026 plan opens all three previously protected subunits to commercial harvest. We ask that before any sale is proposed in this watershed, the DFFP consult with ADF&G on the status of the Chilkoot sockeye run and evaluate whether harvest activity could affect the lake's ability to recover to historic escapement levels.

Unit 9 — Ferebee River: We asked that this remote and largely undisturbed watershed be managed for fish and wildlife habitat and wilderness recreation. The 2026 plan designates Subunit 9a for commercial timber harvest and identifies Taiyasanka Harbor as a future log

transfer facility site. We ask the DFFP to conduct a thorough assessment of cumulative ecological impacts to this watershed before any sale or infrastructure development is proposed, given its currently undisturbed condition.

V. What the Forest Means to This Community

The members of this committee are hunters, anglers, trappers, guides, subsistence users, and people who have lived and worked in the Chilkat and Chilkoot valleys for generations. The Haines State Forest is not a remote abstraction to us, it is the place where we fill our freezers, raise our families, and make our livings. It is where the world's largest concentration of bald eagles gathers each fall and where all five species of Pacific salmon and one of the last healthy eulachon runs in the Lynn Canal continue to support communities that have depended on them for thousands of years.

We understand that the Forest is also a source of timber and that the DNR Commissioner has determined that more of it should be available for harvest. We are not opposed to sound timber management. What we ask is that the decisions about where and how timber harvest occurs be made with full information about what else is at stake — the fish, the wildlife, the hunting and fishing opportunities, the tourism economy, and the subsistence way of life that define this place. Those values deserve to be weighed carefully, not just assumed to be compatible with whatever level of harvest is proposed.

We believe the DFFP shares this commitment to balanced management. We look forward to continuing to work with the DFFP as the plan is implemented and as individual sales are proposed. We are committed to being a constructive voice in that process.

VI. Summary of Requests

The ULCAC asks the DFFP to consider the following before the plan is finalized and as it is implemented:

- (1) Add a definition of old-growth forest and establish harvest standards that recognize its irreplaceable ecological value.
- (2) Develop and publish a clear standard for evaluating proposed timber sales in Habitat and Recreation classified units for consistency with those primary designations.
- (3) Conduct a landscape-scale analysis of anticipated cumulative effects on water quality, fish habitat, and wildlife before harvest is proposed in previously protected areas.
- (4) Add Restoration as a formal land-use category with priority application to the Kelsall River watershed.
- (5) Extend Special Management Zone protections to uncatalogued tributaries of catalogued anadromous streams, or address tributary protection explicitly in individual sale designs.
- (6) Establish a watershed-scale monitoring program for the Chilkat, Chilkoot, and Ferebee drainages to support adaptive management.
- (7) Engage the ULCAC early in the review of proposed timber sales in previously protected areas, consistent with the committee's role under AS §41.15.310.

Thank you for the opportunity to comment on this plan. We recognize the difficult balancing act the DFFP faces in responding to specific policy direction while managing a forest that means so much to the people of Haines, Klukwan, and Skagway. We hope these comments are useful, and we look forward to continuing our work together.

Respectfully submitted,

Adam Smith, Chair
Upper Lynn Canal Fish and Game Advisory Committee

CC:

Kimberley Strong, Chilkat Indian Village President
Brian Willard, Chilkat Indian Village Tribal Administrator
Harriet Brouillette, Chilkoot Indian Association Tribal Administrator
Haines Borough Mayor, Assembly, and Planning Commission
Haines Borough Manager and Planner
Brad Garasky, State Parks Superintendent
Kate Kanouse, ADFG Habitat
Nicole Zeiser, ADFG Commercial Fisheries
Hannah Manninen, ADFG Wildlife Conservation
DNR Commissioner's Office
Senator Jesse Kiehl
Representative Andi Story
Senate Resources Committee

From: [Becky Wilson](#)
To: [DNR DOF Haines Mgmt \(DNR sponsored\)](#)
Subject: No logging in the Chilkat or Chilkoot Valley or Lynn Canal
Date: Friday, June 5, 2026 10:29:50 AM

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To whom it may concern,

We are totally against any type of logging commercially in the Chilkat or Chilkoot Valley's or Lynn Canal.
It's already been clear cut before and it's just now starting to slightly come back !!
Please don't waste our tax dollars on already washed up and out timber cut.
Rebecca Wilson & Lawrence Derby
Sent from my iPhone