From: Daniel Henry
To: DNR DOF Haines Mgmt (DNR sponsored)
Subject: comment re: Haines State Forest Resource Management Plan
Date: Friday, October 23, 2026 10:48:32 AM

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Dear Managers—

I urge you to abandon the current Haines State Forest plan in favor of one that selects timber harvest with regard to habitat impacts rather than wholesale cutting.

Thank you,

Dan
danielhenryalaska.com
https://www.tidelinesinstitute.org/
https://nwwriterss.com/

From: DeLise
To: DNR DOF Haines Mgmt (DNR sponsored)
Subject: comment re: Haines State Forest Resource Management Plan
Date: Friday, October 23, 2026 2:53:15 PM

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I'm not in favor of this Plan. I live in the Chilkat Valley and do not want all of this land designated as timber available lands. Be responsible and stop this.
Thank you for your attention to this matter.
DeLise Keim
[redacted]
Haines, Alaska

From: Kayla Fratt
To: DNR DOF Haines Mgmt (DNR sponsored)
Subject: Reject amendment to Haines State Forest Plan
Date: Saturday, October 24, 2026 1:41:17 PM

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Hello,

My name is Kayla, and I'm a resident of Craig (99921). I am writing to express concern over the amendment to the Haines State Forest Plan that would allow logging in areas previously designated for non-logging activities. This amendment was designed without required input. Please, do not adopt this amendment. Leave areas designed for non-logging activities alone. Many of these areas are my favorite places to exercise my dogs, look for mushrooms, and take visiting friends and family to experience Alaska. Our natural resources are worth more where they are.

Thank you.

Kayla

From: Donna Mulvey
To: DNR DOF Haines Mgmt (DNR sponsored)
Subject: Haines State Forest Plan amendment
Date: Saturday, October 24, 2026 7:25:44 AM

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Please reject this amendment.

Thank you.

Donna Mulvey

Sent from my iPhone

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Ms. Susan Baker
[redacted]

From: Gonzalo Castillo
To: DNR DOF Haines Mgmt (DNR sponsored)
Subject: Haines State Forest Plan amendment
Date: Friday, October 23, 2026 6:08:37 PM

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To: DNR, Division of Forestry,

I urge DOF to revoke and do not adopt the amendment that seeks to expand logging into areas previously designated explicitly for non-logging activities. This proposed change seems illegal as it was not developed in consultation with the Upper Lynn Canal Fish and Game Advisory Committee or the Chilkat Bald Eagle Preserve Advisory Committee, as required.

I request that the Alaska Department of Natural Resources Division of Forestry do not adopt this harmful and shortsighted amendment. Healthy forests like these are a vital trust resource of the people that must be preserved to maintain the quality of life of current and future generations. Forests also play a key role in reducing escalating climate change impacts on our families, wildlife, and the economy.

Most sincerely,
Dr. Gonzalo Castillo

From: [redacted] on behalf of Michele Cornelius
To: DNR DOF Haines Mgmt (DNR sponsored)
Subject: DO NOT adopt Haines State Forest Plan amendment
Date: Monday, October 26, 2026 5:28:34 PM

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CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

As a former long time Haines resident who still visits that area, I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources. Logging impacts the beautiful views which can impact tourism. I would like to go back to this area to hike but would not if this logging takes place.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Sincerely,
Ms. Michele Cornelius
[redacted] Gustavus, AK 99826-0295
[redacted]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Mr. Christopher Creglow
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Mr. Steven Cypra
[redacted]

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Thank you for your time and consideration.

Sincerely,
Ms. Karen Dinnan
[redacted]

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Thank you for your time and consideration.

Sincerely,
Ms. Theresa Dolan
[redacted]

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Thank you for your time and consideration.

Sincerely,
Dr. Marc Dumas
[redacted]

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Thank you for your time and consideration.

Sincerely,
Nicolas Duonn
[redacted]

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Thank you for your time and consideration.

Sincerely,
Holly Fogus
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment. I live in Anchorage and plan to visit Haines and the bald eagle preserve next Fall. Natural, unlogged areas not only preserve habitat for wildlife, but provide sustainable revenue through tourism.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Joan Frankevich
[redacted]

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Thank you for your time and consideration.

Sincerely,
Mr. Christopher Fredell
[redacted]

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Thank you for your time and consideration.

Sincerely,
Ms. Deborah Gravel
[redacted]

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Thank you for your time and consideration.

Sincerely,
Ms. Elizabeth Hofer
[redacted]

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Thank you for your time and consideration.

Sincerely,
Simon Hook
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

Do not opent this forest up for logging. Instead go to the indigenous folks who have lived on this land for hundreds of years. Ask them how to manage this forest, meaningfully involve them in the decisions. You could also let them do the logging an profit from their work. I understand that some logging is needed for the health of the trees and to make forest fires harder. Do not clear cut. We need our forests to breath for our planet.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation, and prioritize the long-term health of the Haines State Forest and the world.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Teri Inch
[redacted]

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Thank you for your time and consideration.

Sincerely,
Mr John Dinnan
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.
Please listen to the voices of the people, many have an interest and stake in use of public lands, not just those wishing to monetize them.

Thank you for your time and consideration.

Sincerely,
Ms. Ingrid Jensen
[redacted]

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Thank you for your time and consideration.

Sincerely,
Ms. Kara Johnson
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

The people of the United States were not told "if" we agree to this logging action it was presented more as how or when. Our old growth forests are precious commodities that provide shelter for our flora and fauna. They offset the carbon cycle by releasing oxygen. In a time where there is more pollution due to new developments in AI we need more carbon offset. The Haines State Forest help us with this.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

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Thank you for your time and consideration.

Sincerely,
Mrs. Mackenzie Jolly
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Thank you for your time and consideration.

Sincerely,
Dr. William Lange
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Thank you for your time and consideration.

Sincerely,
Ms. Elizabeth Leban
[redacted]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Selby Long
[redacted]

From: [redacted] on behalf of Kevin Main
To: DNR DOF Haines Mgmt (DNR sponsored)
Subject: DO NOT adopt Haines State Forest Plan amendment
Date: Monday, October 26, 2026 5:23:13 PM

[You don't often get email from kevinwmain@everyactioncustom.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

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Thank you for your time and consideration.

Sincerely,
Mr. Kevin Main
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I remain opposed to the Haines State Forest Management Plan Amendment, as most of our community has been publicly and in writing prior to this decision where the HSF simply ignored our significant input.

The proposed changes would allow logging in areas previously designated for other uses, threatening important wildlife and fish habitat, recreation, and other public use resources. The health and biodiversity of the Chilkat Valley and the Chilkat Bald Eagle Preserve depend upon the health of the entire watershed, both within and upstream of the Preserve boundaries in both the Chilkat and Chilkoot watersheds.

We are okay with local logging serving local needs, such as firewood and lumber for local sawmills for local construction use. We, as a community, do not support industrial-scale logging for export. DNR has been proceeding with their own agenda which doesn't meet the criteria of state law that state resources should meet the needs of the people of the state.

The Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity for robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment, conduct and show up-to-date studies that would back-up any conclusions in any future proposed amendments, and ensure meaningful and robust consultation with both advisory committees in order to prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Sincerely,
Ms. Kathleen Menke
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

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Thank you for your time and consideration.

Sincerely,
Ms Laura Minne
[redacted]

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Thank you for your time and consideration.

Sincerely,
Mr. K. Murphy
[redacted]

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Thank you for your time and consideration.

Sincerely,
Kevin Parker
[redacted]

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Thank you for your time and consideration.

Sincerely,
Ms Kate Persons
[redacted]

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Thank you for your time and consideration.

Sincerely,
Ms Carol Race
[redacted]

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Thank you for your time and consideration.

Sincerely,
Dr. Richard Rothstein
[redacted]

Outlook

DO NOT adopt Haines State Forest Plan amendment

From Brady Rufner [redacted]
Date Mon 10/26/2026 5:29 PM
To DNR DOF Haines Mgmt (DNR sponsored) <dnr.dof.haines@alaska.gov>

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Brady Rufner
[redacted]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Mr. John Sonin
[redacted]

From: [redacted] on behalf of Jack Spark
To: DNR DOF Haines Mgmt (DNR sponsored)
Subject: DO NOT adopt Haines State Forest Plan amendment
Date: Monday, October 26, 2026 5:27:32 PM

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Jack Spark
[redacted] Ketchikan, AK 99901-6522
[redacted]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Ms. Sandra Stanway
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I have been a long-time resident of Southeast Alaska and am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

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Thank you for your time and consideration.

Sincerely,
Mr. Donald Surgeon
[redacted]
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to share robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Karen Wilson
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am a resident and property owner in Haines and I oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes do not ask IF we want logging in our forest only HOW we want the logging to take place.

It opens 7,608 acres of public recreation lands and 13,472 acres of wildlife habitat to commercial timber extraction.

Involve Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council in the planning process.

Prioritize the long-term health of the Haines State Forest, not just short-term extraction.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Joe Aultman-Moore
[redacted]
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

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Thank you for your time and consideration.

Sincerely,
Sally Boisvert
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Thank you for your time and consideration.

Sincerely,
Mr. Chilton Bowman
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Thank you for your time and consideration.

Sincerely,
Mr. John Breiby
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Thank you for your time and consideration.

Sincerely,
Mr. Ray Bulson
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

As a former Haines resident, I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

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Thank you for your time and consideration.

Sincerely,
Mr. Nicholas Cassara
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Thank you for your time and consideration.

Sincerely,
Ms. Della Coburn
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Thank you for your time and consideration.

Sincerely,
Brett Collins
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

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Thank you for your time and consideration.

Sincerely,
Mrs. Linda Deakins
[redacted]

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Thank you for your time and consideration.

Sincerely,
Ms. Deirdre Downey
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Mrs Cathleen Gordon
[redacted]

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Dear Department of Natural Resources,

I am submitting public comments regarding the 2026 Draft Management Plan for the Haines State Forest (HSF) to express concern over several proposals and urge the Department to reconsider its direction.

The plan more than doubles the commercial timber harvest footprint by adding 47,000 acres to the existing 42,000 acres. Opening 7,608 acres of public recreation lands and 13,472 acres of wildlife habitat to extraction fails to manage the forest for multiple uses like recreation, conservation, and biological values. Additionally, the plan relies on an inflated Annual Allowable Cut (AAC)—increasing from 5.88 to 14.77 million board feet—based on unrealistic tree regrowth calculations for the Chilkat area and the questionable inclusion of low-demand cottonwood.

The draft also ignores the impacts of expanded logging on the adjacent Chilkat Bald Eagle Preserve, risking severe harm to both interconnected areas. Furthermore, the proposed carbon offset projects lack legitimacy, as expanding the timber base risks increasing net forest damage and emissions rather than reducing them.

Under Article VIII, Section 1 of the Alaska State Constitution, resource development must align with the public interest. Prioritizing widespread logging over a balanced, multiple-use approach conflicts with this mandate.

I request that DNR revise the plan to accurately reflect inventory metrics, protect critical wildlife and recreation acreage, and properly balance conservation with resource development.

Sincerely,
Chris Hackbarth

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The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Lenore Bleau Hale
[redacted]

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I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Marilyn Heiman
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I have property in Haines and am invested in it's future. I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Mrs. Marika Hintz
[redacted]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

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Thank you for your time and consideration.

Sincerely,
Mr. Larry Hura
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

Let's start this procedure over and follow statutes required on the Haines State Forest Plan amendment. I am writing to OPPOSE the proposed amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Mrs. Nelle Jurgeleit-Greene
[redacted]
[redacted]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

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The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Ms. rachael juzeler
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

In the 66 years of my residency in Alaska I have never seen such brazen presumptions by the State of Alaska regarding how our precious forest resources are to be used. I cannot help but think that the trump administration is behind this. So, this is the reason why I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity for robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a precious public resource that should be managed with careful consideration for its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you..

Sincerely,
Mr. FRANK Keim
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources. As a lifelong Southeast resident subsistence hunter and fisherman I want the land to be managed with subsistence as the priority.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Mr David Lesh
[redacted]
[redacted]

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I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

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Thank you for your time and consideration.

Sincerely,
Ms. Margaret McNeil
[redacted]

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Thank you for your time and consideration.

Sincerely,
Mr Scott Miller
[redacted]

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Thank you for your time and consideration.

Sincerely,
Ms. Monica ritter
[redacted]

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I am writing to submit public comments regarding the 2026 Draft Management Plan for the Haines State Forest (HSF). I have significant concerns regarding several key proposals within the current draft and urge the Department of Natural Resources (DNR) to reconsider its direction.

First, the proposed plan more than doubles the commercial timber harvest footprint by adding 47,000 acres to the existing 42,000 acres. Opening 7,608 acres of public recreation lands and 13,472 acres of wildlife habitat to commercial timber extraction fails to properly manage the forest for multiple uses, such as recreation, conservation, and biological values. Furthermore, the plan relies on an inflated Annual Allowable Cut (AAC)—increasing from 5.88 to 14.77 million board feet—based on unrealistic tree regrowth calculations that do not reflect conditions in the Chilkat area, as well as the questionable inclusion of cottonwood despite low market demand.

Second, the draft fails to account for the impact of expanded logging on the adjacent Chilkat Bald Eagle Preserve. Neglecting the interconnected relationship between these two areas risks severe harm to the foundational values of both. Additionally, the proposed carbon offset projects lack legitimacy; by expanding the overall timber base, these projects risk increasing net forest damage and emissions rather than reducing them.

Under Article VIII, Section 1 of the Alaska State Constitution, resource development must remain consistent with the public interest. Prioritizing widespread commercial logging over a balanced, multiple-use approach directly conflicts with this constitutional mandate.

I request that DNR revise the draft management plan to accurately reflect inventory metrics, protect critical wildlife and recreation acreage, and properly balance conservation with resource development.

Thank you for your time and consideration of these comments.

Sincerely,

Amy Robinson

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Priscilla Shults
[redacted]

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Thank you for your time and consideration.

Sincerely,
Ms. Salome Starbuck
[redacted]

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Hello,

In the proposed amendment to the Haines State Forest Plan, please keep areas classified as Wildlife Habitat or Public Recreation. This keeps a balance of protected habitat and areas open for timber harvest.

Sincerely,

Nancy Waterman

--

Nancy Waterman

[redacted]

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Thank you for your time and consideration.

Sincerely,
Mrs. Jill Wittenbrader
[redacted]

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Thank you for your time and consideration.

Sincerely,
Ms Laurie Dadouruan
[redacted]

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Thank you for your time and consideration.

Sincerely,
Mr. Tony Scott Pearce
[redacted]

Hi Geneva,

I wanted to reach out regarding the Intent-to-Adopt comment period for the Haines State Forest Management Plan Amendment. During the Inter-Agency review period on November 13, 2025, DMLW provided updates that we believe need to be made to the plan (see attached email). From our recent review of the plan documents that were posted for the Intent-to-Adopt period, all but one of those recommended updates have not been incorporated. Please see attached spreadsheet that notates in Column H where these changes did/did not occur. If you could please let us know why these changes were omitted or if there will be another opportunity to make the changes, that would be appreciated. Thank you!

Regards,

Kaitlyn Raffier
Southeast Regional Manager
Division of Mining, Land and Water | Department of Natural Resources
Phone: 907.465.3406 | **Email:** kaitlyn.raffier@alaska.gov
DNR DMLW Southeast Office Phone: 907.465.3400

"Putting Alaska's resources to work – now and in the future!"

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Thank you for your time and consideration.

Sincerely,
Tresham Gregg
[redacted]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

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Thank you for your time and consideration.

Sincerely,
Jan Highfield
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources. Do not log the Chilkat Ridge!

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

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Thank you for your time and consideration.

Sincerely,
Katya Kirsch
[redacted]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

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Thank you for your time and consideration.

Sincerely,
Lila Quigley
[redacted]

[redacted]

Dear Forest Planner and Alaska Department of Natural Resources,

Please accept this email as my public comment during the Intent-to-Adopt review period for the Haines State Forest Resource Management Area Management Plan Amendment.

I am writing from Reggio Emilia, Italy, to urge DNR to reject the amendment in its current form and revise it to provide stronger, enforceable protections for wildlife habitat, watersheds, and recreation areas.

I share SEACC's concern about identifying commercial timber harvest as a possible use across all land designations. Areas designated primarily for wildlife habitat and public recreation should retain meaningful protections that reflect those priorities. Please identify clearly where commercial logging would be incompatible with these values and exclude it from those areas.

I respectfully ask DNR to:

• Protect old-growth habitat and maintain connected areas where wildlife can feed, shelter, and move without disturbance from logging and associated roads.

• Establish clear safeguards for salmon-bearing waters, water quality, and sensitive areas adjoining the Chilkat Bald Eagle Preserve.

• Evaluate the cumulative effects of logging and road construction on biodiversity, carbon storage, recreation, and the livelihoods that depend on healthy forests and rivers.

• Ensure that Tribal governments and affected communities have meaningful opportunities to shape management decisions, with their knowledge and concerns reflected in the final plan.

• Consider lower-impact alternatives and demonstrate how any proposed timber activity would remain compatible with the primary purposes of each area.

Although I do not live in Alaska, I care deeply about the long-term protection of these ecosystems. My support is offered with respect for the Indigenous peoples and local communities whose lives and traditions are connected to this landscape.

Please do not adopt the amendment in its current form. A revised plan should place lasting ecological protections at the heart of forest management and provide clear, accountable standards for implementing them.

Thank you for considering my comments. Please include this email in the public record and confirm receipt.

Sincerely,
Luca Grisendi

[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Ryan Irvin
[redacted]

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The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I live right in the middle of the Haines State Forest and Division of Forestry has consistently disregarded affected landowners' concerns to planned logging in residential neighborhoods. A proposed log harvest access road is planned for River View Dr. right across from my driveway with logging the hillside just above my land and home. The Department of Natural Resources also plans vast logging on the steep hillside directly above the Four Winds Resource Center, our local community center, against the vast protests of community members.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Greg Rasmussen
[redacted]

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The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Ms Nanci Spear
[redacted]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Ms. Jeana Varney
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I oppose the proposed Haines State Forest Management Plan Amendment.

I urge the DNR to reject the amendment in its current form and engage with all advisory committees. The long-term health of the Haines State Forest should be our goal.

The Haines State Forest is not replaceable. Let us tread carefully and embrace meaningful public involvement and transparent decision-making.

Thank you.

Sincerely,
Thomas Cosgrove
[redacted]

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I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Ms. Lauren Cusimano
[redacted]

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

As a resident of Haines I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes in the guise of carbon credits would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources. The carbon credit program for the HSF has now been abandoned opening up previous areas left out of the timber base to clear-cut logging. That is not right and possibly illegal.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest. It is time to start the process over.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making. That has not occurred for this HSF Plan revision.

Thank you for your time and consideration.

Sincerely,
Mr Thomas Ely
[redacted]

Eric Holle
Haines State Forest plan comments 11/1/2026
Alaska Dept. of Natural Resources, Division of Forestry

Thank you for the opportunity to comment. I am extremely impressed with the well-informed comments submitted by individuals and non-profit organizations regarding the proposed Haines State Forest plan amendment. It is clear that the public has been keeping informed regarding ecology of old growth forests and potential negative impacts of outdated forest management practices. Sadly, this does not appear to be the case with the Division of Forestry (DOF). To wit:

In the categories of Alternative Land Use Credits, Carbon Offsets, Carbon Management the DOF response to public comment seems to be simply that "we don't have a program to address this. . ." or simply "noted." In the categories of Habitat, Restoration, Forest Resources the response to public comments can be summarized as "We don't do policy, AAC doesn't address this, and it is beyond the scope of DOF responsibility." Or "we will consult with appropriate state agencies." Essentially DOF says that their job is just to cut trees using clearcut logging as the preferred method and a seriously flawed annual allowable cut. Comments regarding the need for an economic analysis that demonstrates financial benefits to the state are simply ignored. The well-stated need for a definition of Traditional Ecological Knowledge (TEK) and for a role in forest management is dismissed, stating that ADNR does not have a definition or legal framework to use TEK. DOF then confuses traditional uses such as hunting, fishing, berry picking with traditional management of forests. If DOF lacks authority to adopt prescriptive changes suggested by a large percentage of the public, then DOF needs to help move those suggestions up the ladder, so to speak. Institutional change requires pressure from both within and outside agencies.

For 37 years I, as an individual or a representative of Lynn Canal Conservation (LCC) have advocated for the use of best available science in DOF forest management. The response to this continues to be "that is our policy" with no supporting evidence of doing so. Beginning with my submission in the early 1990s of Influence of Forest and Rangeland Management on Anadromous Fish Habitat in Western North America; Pacific NW Forest and Range Experiment Station; USDA Forest Service 1979-1985 through more recent peer-reviewed analyses and meta-analyses such as Global Importance of Large Diameter Trees; Global Ecology and Biogeography/V27/Issue 7/pp 849-864 by James Lutz et.al., DOF has ignored best available science rather than incorporate it into management practice. Likewise with my oral submission of a recent meta-analysis to DOF on this plan amendment April 29,2026: Rate of Tree Carbon Accumulation Increases Continuously with Tree Size; Stephenson et.al; Nature 12914. This meeting was attended by just two members of the public and Jeremy Rouse, State Director; Greg Palmieri, Coastal Director,; and Geneva Preston. I have also made the DOF aware of an important ADF&G study in the forests of SE Alaska by Flynn, et al, 2007 which recommends "retain at least 500 foot no cut buffers along streams with spawning salmon and/or increased habitat protections (or total deferment of vegetative management) where healthy bear populations are a management objective." The new proposed plan shows no indication that public comments or best available science, including TEK, were considered. With all due respect, it is far overdue for DOF to begin incorporating actual best available science and TEK or risk the agency itself becoming "overmature and decadent," an outmoded but favorite phrase of Alaska State Foresters.

To provide assistance to achieve actions noted above, I offer the following peer-reviewed studies that are relevant to maintaining the ecological health of Haines State Forest. Regarding the importance of understanding soil health as essential to forest health, see:

S.W. Simard, WJ. Roach, J. Beauregard, et al. Partial retention of legacy {oldest trees in a given stand} trees protects mycorrhizhal inoculum potential, biodiversity, and soil resources while promoting natural regeneration of interior Douglas-fir. Frontiers in Forests and Global Change 3 (2021: 620436, doi:10.3389/ffgc.2020.620436.

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I look forward to hearing that DOF will incorporate guidance from the above studies plus many others provided to DOF over nearly four decades by myself and by Lynn Canal Conservation, Inc. As a final thought, I offer an observation by Canadian forester and forest ecologist Herb Hammond (pers. comm.) - Instead of first determining the amount of timber to be removed from a forest, it makes far more sense to first follow this scenario:

1. Describe the pre-industrial character of the ecosystem, and the current condition of this system
2. Define ecosystem patterns, processes, and ecological limits to human activities
3. Design what to leave - networks of ecological reserves at multiple spatial scales
4. Determine what to use and how to use it - establish and define human use areas, diverse community-based forest based economies, and restoration procedures.

Eric Holle

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Eric Holle

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, Alaska 99827
PH: (907) 767-5505
FX: (907)767-5518
Email: klukwan@chilkat-nsn.gov

November 2, 2026

Re: Chilkat Indian Village (Klukwan) Comment on DFFP's Haines State Forest Resource Management Plan Amendment Issue Response Summary

Dear Division of Forestry and Fire Protection (DFFP) officials,

The Chilkat Indian Village (Klukwan) Tribal Council submits the following public comment letter and recommendations in response to DFFP's issue response summary (IRS) regarding the draft Haines State Forest Resource Management Area (HSF RMA) Management Plan. Chilkat Indian Village (Klukwan) (CIV hereinafter) is a sovereign and federally recognized Tribal Nation[1] 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. CIV is timely filing this comment within the 30-day "intent to adopt" comment period, whose deadline is 5:00 pm on Monday, November 2, 2026.

Gunalchéesh for DFFP's partnership and willingness to incorporate several of CIV's recommendations into the amended plan. The proposed additions including adaptive management, climate-adapted forest management, and cultural resources represent significant improvements over previous HSF management plans and reflect the value of our ongoing dialogue. Building on this progress, CIV submits the following requests to resolve outstanding concerns with the HSF RMP Amendment and DFFP's Intent to Adopt:

1. Eliminate or Revise Recommended Definition of "Consultation."

Pages 15 and 16 of the IRS provide the following issue summary:

> *the State should adopt, within the HSF RMA plan, a standing consultation protocol specifying:* Minimum review time frames and information that will be provided (e.g., maps, growth assumptions, economic analysis, habitat modeling); *the state should adopt,*

[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.

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.

Along with a Recommended Change:

Add DNR definition of "Consultation" to Appendix A *Glossary*: "Under existing statutes, regulations, and procedures, the Department of Natural Resources informs other groups of its intention to take a specific action and seeks their advice or assistance. Consultation is not intended to be binding. It is a means of informing affected organizations and individuals about forthcoming decisions and getting the benefit of their expertise. DNR replies to parties offering advice or assistance by informing them the decision and the reasons for which the decision was made or notifying them that the decision and finding are available upon request."

Add description of consultation efforts and public engagement opportunities from current planning effort to Chapter 1, *how this plan was developed* as a reference for future planning efforts.

DFFP consultation obligations arise under statute in the HSF enabling act, at AS 41.15.310[3] and AS 41.15.320.[4] Additionally, under the Forest Resources and Practices Act (FRPA), AS 41.17, DNR is obligated to afford "due deference" to, and recognize the expertise of, ADEC and ADF&G, for management decisions within the scope of those agencies' expertise.[5]

CIV recommends that DFFP eliminates its proposed definition of "Consultation."
The proposed definition does more to confuse rather than clarify DNR's statutory obligations. Elsewhere in the issue response summary, DFFP declines to elaborate on clear statutory guidance through policy ("Consultation requirements for planning and administration processes within the HSFRMA are stated explicitly in statute. There is not a practical benefit to re-stating

[3] ("The division of forestry and fire protection shall 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 Haines State Forest Resource Management Area and the Alaska Chilkat Bald Eagle Preserve for the values for which each is established.").

[4] ("In adopting a forest management plan for the Haines State Forest Resource Management Area under AS 41.17.230, the department shall consult with the Department of Fish and Game and the governing bodies of each municipality in the general area. The Department of Fish and Game shall consult with the department and local fish and game advisory committees, if any, before adopting regulations governing fish and wildlife management in the Haines State Forest Resource Management Area. Regulations may not be adopted by either department without prior review at a public hearing in Haines and Klukwan.").

[5] AS 41.17.098(e) ("In this section, "due deference" means that deference that is appropriate in the context of the agency's expertise and area of responsibility and all the evidence available to support a factual assertion. Where due deference is given, if the commissioner does not agree with a commenting agency, the commissioner shall prepare a written statement of the reasons for the disagreement.").

statutory requirements in policy if no elaboration is required to guide implementation.").[6] CIV agrees that re-stating the statutory obligation to consult, and with whom, is both unnecessary and unhelpful. Introducing a separate policy definition creates uncertainty about whether it merely describes existing requirements or is intended to establish a standard for their implementation, particularly as statutes, regulations, and procedures may change.

CIV is additionally concerned that the proposed language, because of its content and the context in which it is being applied, may do harm to CIV's distinct rights as a political sovereign either expressly or by implication. The State of Alaska has done much less than it could to formalize government-to-government relations with federally-recognized Indian Tribes, especially since the passage of Administrative Order No. 300 under Governor Walker's administration.[7] CIV's participation in the RMP planning and development process has been challenged due to semi-formal state policies disclaiming any responsibility or obligation to meet on a government-to-government basis.

Federal law and regulations already provide definitions and procedural frameworks for consultation.[8] While these laws and regulations do not apply to the State of Alaska, and the government-to-government relationship is indeed primarily between the federal government and federally-recognized Indian Tribes, rooted in the federal trust responsibility, states across the country have done much more to formalize and establish protocols for consultation born of the mutual respect accorded by one sovereign to another.[9] In the absence of such a protocol in the state of Alaska, CIV is concerned that the draft language as it applies to DNR's statutory requirements may confuse or unduly affect the ongoing process of developing a formal, capital "C" Consultation process between the state and Indian Tribes.[10] In other words, we request that DNR account for established frameworks and the State's own prior commitments, including Administrative Order No. 300, when developing policies and definitions to ensure that its language does not inadvertently narrow what "Consultation" with Tribal Governments means, or prejudice future development of government-government relations between the State and Tribes.

---

[6] *Issue Response Summary* at 31.
[7] See Alaska Administrative Order No. 300
[8] 36 C.F.R. § 800.16(f)
[9] See Minnesota Government-Government Relationship with Tribal Governments
[10] See Alaska Administrative Order No. 300 ("It is the policy of the State of Alaska to recognize Alaska Tribes' sovereignty by interacting and engaging with Alaska Tribes on a government-to-government basis."). This AO is limited in scope to addressing the "linguistic emergency" of loss and potential extinction of Alaska Native languages. As DFFP has identified in formal correspondence with CIV Tribal Council, "AO 300 does not legally mandate government-to-government consultation for this planning process . . . the State recognizes the relationship and trust responsibility between the United States government and federally recognized [T]ribes, including the Chilkat Indian Village, but the State does not have a concurrent trust relationship with federally recognized [T]ribes . . . while formal consultation under AO 300 is not applicable in this context, we look forward to exploring alternative avenues for dialogue."

DFFP's response also fails to meaningfully respond to the comment's recommendation for developing a replicable *process* by which consultation is accomplished, rather than simply disclaiming what consultation does and does not require. The public comment indicated a desire for clarity and transparency regarding how DNR ensures it is consulting when it develops anything from land management plans to individual projects and resource management decisions. CIV agrees with the public comment that greater clarity and process, available to and understood by the public, can only improve public confidence and ensure that DFFP fulfils its statutory mandate.

This is uniquely true for management decisions in HSF relative to other state lands managed according to principles outlined under the FRPA. As members of staff identified in meetings with CIV, the HSF is the only state forest unit whose enabling legislation mandates consultation with specifically named entities, including the CBEP AC. These are statutory rights-holders who will benefit from a standard process, clearly outlined and identified in the management plan, for the exercise of those rights.

In the alternative to eliminating the proposed definition, CIV recommends amending the proposal to clarify that consultation in this context refers exclusively to DFFP's fulfillment of statutory obligations as identified in AS 41.15.310, AS 41.15.320, and AS 41.17, and not to other forms of consultation in which DFFP may engage.

2. DFFP Has Not Meaningfully Responded to CIV's Public Comment Regarding Traditional Use.

CIV has provided input throughout the RMP draft amendment process, including during community meetings, direct meetings with DFFP, and in public comment, regarding statutory language included in the HSF enabling act at AS 41.15.300 *et seq*. that gives joint priority to multiple use and other beneficial uses, including traditional use, in managing the HSF. CIV's public comment provided 3 pages of input, analysis, and recommendations regarding DFFP's statutory obligations in managing the forest for the continuation of traditional uses. DFFP catalogued these comments in pages 23-26 of the IRS. To each portion of CIV's comment, DFFP prepared the same response:

> In the enabling statues [sic] for HSFRMA, traditionally compatible uses are defined as "[including but not limited to] fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood." These uses are addressed in the management plan through guidelines related to fish and wildlife habitat, recreation, transportation, and forest resources.
>
> In addition, AS 38.04.200 requires agencies to manage lands and water to maintain "traditional means of access for traditional outdoor activities." Definitions for

> "Traditional Means of Access" and "Traditional Outdoor Activities" are established in AS 38.04.200(b).

CIV is concerned that this response does not meaningfully engage with, let alone resolve, the issues raised in public comment. CIV is further concerned that DFFP summarized CIV's comments in a manner that omitted legally significant concerns, failing to address or even capture those concerns within the publicly available issue response summary, which may open DFFP to procedural and substantive challenges in its land management policies and practices under a finalized HSF RMP if it does not respond meaningfully on the record. DFFP's response appears to assume that traditional uses are adequately accounted for because they remain permissible within the HSF and overlap with activities addressed in other management guidelines. CIV's request for explicit management policies should not be understood as an assertion that traditional use is categorically prohibited or denied. Rather, CIV is asking *how* DFFP affirmatively accounts for the continuation of traditional use in its planning and management decisions. The ability to engage in activity does not, by itself, demonstrate that management decisions account for the conditions necessary to sustain that activity, including the resources, places, and opportunities on which it depends. Guidelines for fish and wildlife habitat, recreation, transportation and forest resources do not explain how those guidelines work together to ensure the continuation of traditional use. Additionally, using the project-specific planning and public input processes involved in developing a FLUP, BIF, or FYFMS, do not adequately ensure that the state is managing for continued traditional use.

Specifically, and despite multiple conversations and exchanges of information between CIV and DFFP, the department continues to conflate legally distinct terms of art across time and statutory context, replacing clear statutory text from the HSF enabling act with extraneous legal definitions drawn from other areas of state law that *did not exist* at the time the HSF was established. CIV identified in its public comment that DFFP is in error by relying on the definition of "traditional means of access" as defined in AS 38.04.200 in interpreting the phrase "traditional use" as applied in the HSF enabling act. Concerningly, DFFP did not address, or even include this, in its issue response summary. CIV reiterates and restates from its public comment the following concern:

> 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 use 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[11]. The HSF RMA was established in 1982, fifteen years

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before this legislative amendment to the Alaska Lands Act provided definitions for "traditional means of access" and "traditional outdoor activities."[12] 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.

DFFP omitted these submitted comments in their entirety from its issue response summary. This is critical context for public and agency review, requiring meaningful agency response. DFFP's response is insufficient–it does not directly address or resolve, let alone even identify, outstanding concerns raised in public comment, comprising part of the administrative record, regarding its fulfillment of statutory obligations. To reiterate–DFFP has failed to provide a meaningful reason, or any reasoning at all, for why and how it gives meaning to the term "traditional use" as it exists in the HSF enabling statute. CIV challenges the sufficiency of its reference to AS 38.04.200, whose "traditional means of access" provisions did not exist at the time the Haines State Forest was created. Without this reasoning, and without a response contained within the administrative record, it is not clear whether or how DFFP is managing the forest for the joint purposes for which it was established or ensuring it is complying with its administrative and procedural obligations.

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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 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).

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The same concern applies regarding DFFP's failure to give meaning to the statutory construction, also in the HSF enabling act, that ensures that the "opportunity for continued traditional use of the Haines State Forest Resource Management Area at levels and by traditional methods and means is guaranteed."[13] This is a statutory right for all persons who make use of the HSF. DFFP has identified that input regarding project-level effects on traditional uses and use areas will occur as part of any FLUP, BIF, or FYFMS. These alone are insufficient to ensure that continued traditional use *at levels and by traditional methods and means is guaranteed*. Just as FRPA and AS 38.04 and .05 require an inventory of resources to determine land use classifications and forest management decisions under the multiple use and sustained yield principle, there must be a baseline of information against which to assess project-level effects on traditional use. Project-specific public comment opportunities are missing legally significant and determinative context when they exist without baseline information; here, the levels of traditional use throughout the forest are guaranteed by statute, yet there is no process for determining what those levels are.

Again, DFFP, in summarizing CIV's public comment, excluded this concern from the issue response summary. In doing so, DFFP has not addressed the existing and outstanding question of how the HSF RMP will provide a mechanism by which DFFP ensures it fulfills its statutory obligation to guarantee that traditional use continues at levels and by traditional methods and means. CIV again requests that DFFP include provisions in the draft plan that address this concern and provide a means by which these guaranteed uses and levels are ensured as part of DFFP's overall forest management.

This is not simply a difference of interpretation, or a matter that can rightly rest within the purview of agency discretion. DFFP has not responded to legally significant concerns raised via public comment and has also not included CIV's specific concerns in the issue response summary. Nor is there a defensible argument that the agency's response, which purports to interpret terms written into the HSF enabling act, is permissible. DFFP has, instead of attempting to interpret legally significant statutory text, decided to replace words and definitions with those provided in other tangentially related statutes. The distinction in word choice across statutes must be given meaning; otherwise, the legislature would have used the same words and definitions in the HSF enabling act as it did in its land use laws at AS 38.04 and .05.

Alternatively, if DFFP continues to rely on AS 38.04.200's definition of "traditional outdoor activity," CIV urges that DFFP–with the same consistency, breadth, and thoroughness as it does for timber and other resource inventories–identify, document, and manage for the guaranteed continuation at levels of those activities which "have historically been conducted as part of an individual, family, or community life pattern." CIV is prepared to support any effort to identify those traditional outdoor activities whose continuation is guaranteed as part of the HSF enabling

[13] AS 41.15.315(b).

act, and points to the coordinated management and cooperative agreement powers conferred by statute as mechanisms by which this work can be accomplished.[14]

By failing to capture in the issue response summary multiple legally significant concerns raised during public comment, by relying impermissibly on erroneous interpretations of statutory text, and by failing to provide a sound or clear basis of reasoning for its decisions to adopt or decline to adopt recommendations, DFFP has so far failed to conform with its administrative and procedural requirements in developing the HSF RMA draft management plan. DFFP's responses raise concerns that it is not engaging meaningfully in the public comment and review process that is the bedrock of exercising its legislatively conferred authority in the interest of the citizenry and which is required by AS 41.15 and AS 44.62. Without understanding the basis or reasoning for DFFP's discretionary decisions, there can be no public confidence that DFFP is fulfilling its statutory mandate.

3. CIV Requests Reconsideration and Detailed Reasoning Regarding DFFP's Decision to Decline Including Traditional Ecological Knowledge (TEK) in HSF RMP.

CIV provided recommendations during public comment that DFFP acknowledge the existence and availability of Traditional Ecological Knowledge (TEK) in forest management decisions. CIV identified ways that TEK can be applied consistently within the management framework outlined by the FRPA–specifically, that forest management should include, "to the maximum extent possible, all applicable data and information of applicable disciplines should be updated and used in making decisions relative to the management of forest resources."[15] DFFP provided the following in its issue response summary: "ADNR does not have a legal definition or a management framework to address Traditional Ecological Knowledge (TEK)."[16]

The same was true of adaptive management, which CIV recommended be included as part of DFFP's forest management principles and framework. CIV proposed language to provide a definition of, and role for, adaptive management, drawn from the Tanana Valley State Forest RMP. DFFP responded with concurrence and recommended to "add language to plan defining adaptive management framework and describing forest management implications on state lands."[17]

When asked in direct meetings with CIV Councilmembers, DFFP noted that, without legislative amendments (presumably to FRPA), it could not include or apply TEK in its forest management

[14] AS 41.15.310(b) ("Resource studies undertaken by the department shall be designed to benefit the management and administration of the Haines State Forest Resource Management Area and the Alaska Chilkat Bald Eagle Preserve."); AS 41.15.325 ("The department may enter into cooperative management agreements with a person who holds title to or has a valid entry on land within or adjoining the boundaries of the Haines State Forest Resource Management Area.").
[15] AS 41.17.060(b).
[16] *Issue Response Summary* at 22.
[17] *Id*. at 1.

practices. CIV patently disagrees. The authority already exists under the FRPA, through provisions previously identified that require and encourage interdisciplinary data gathering to inform sound forest management.

CIV requests reconsideration of DFFP's policy stance and conclusory statement that there is no legal definition of, and therefore no possible framework for including, TEK. CIV provided those recommendations in its original public comment, on the same terms and in similar form to its approved and adopted recommendation for the inclusion of adaptive management. ADNR's response is not consistent with the broad latitude its statutory discretion under FRPA affords. Nor must there be a legal definition under Alaska law for forest managers to apply TEK. Indeed, the FRPA does not list or define the forms of data that may contribute to sound forest management. Adaptive management is not defined under statute, yet DFFP is prepared to include it in the HSF RMP. Sound forest management evolves over time in reflection of existing, emerging, and best practices. Just as ADNR can make a discretionary decision to affirm the role of adaptive management in its practices, consistent with FRPA, so too can it acknowledge and include TEK. Other agencies within the state, at the federal level, and in other states, do already look to TEK as an applicable source of data and information on which to base sound forest management decisions. CIV disagrees with ADNR's response as a matter of fact. If DFFP is unwilling to include TEK for another reason, including policy preferences, it must be reflected in the administrative record.

The Haines State Forest, as identified by DFFP personnel during formal meetings, is indeed a unique creation under Alaska law. Its concurrent establishment and coordination with the Alaska Chilkat Bald Eagle Preserve, the requirement for statutorily-mandated consultation with a robust array of governments, boards, and community groups for sound management and management planning, and, perhaps most significantly, the millennia-long stewardship and present-day landowner status of the people of Tlákw Aan within the exterior boundaries of the forest, make planning and decision-making within this state land unit singular. DFFP's issue response summary does not adequately respond to outstanding substantive and procedural concerns raised in previous public comments submitted by CIV and re-iterated in this public comment letter. CIV urges reconsideration of the above-mentioned issues and requests that DFFP respond, on the record, with its basis of reasoning for any decision to adopt or decline adoption of recommended changes.

Gunalchéesh for your consideration of these comments.

Respectfully,

Kimberley A. Strong

Kimberley A. Strong,

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear DFFP Officials,

Thank you for making the time to meet with CIV Tribal Council on October 27th, 2026. We sincerely appreciate DFFP's commitment to discussing your decision-making on the HSF RMP Amendment with us. Attached are CIV's written comments. We hope the Division will consider our requests and we would be happy to discuss them staff-staff as well. Please let us know if you have any questions.

Gunalchéesh for your continued partnership and consideration.

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, Alaska 99827
PH: (907) 767-5505
FX: (907)767-5518
Email: klukwan@chilkat-nsn.gov

November 2, 2026

Re: Chilkat Indian Village (Klukwan) Comment on DFFP's Haines State Forest Resource Management Plan Amendment Issue Response Summary

Dear Division of Forestry and Fire Protection (DFFP) officials,

The Chilkat Indian Village (Klukwan) Tribal Council submits the following public comment letter and recommendations in response to DFFP's issue response summary (IRS) regarding the draft Haines State Forest Resource Management Area (HSF RMA) Management Plan. Chilkat Indian Village (Klukwan) (CIV hereinafter) is a sovereign and federally recognized Tribal Nation[1] 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. CIV is timely filing this comment within the 30-day "intent to adopt" comment period, whose deadline is 5:00 pm on Monday, November 2, 2026.

Gunalchéesh for DFFP's partnership and willingness to incorporate several of CIV's recommendations into the amended plan. The proposed additions including adaptive management, climate-adapted forest management, and cultural resources represent significant improvements over previous HSF management plans and reflect the value of our ongoing dialogue. Building on this progress, CIV submits the following requests to resolve outstanding concerns with the HSF RMP Amendment and DFFP's Intent to Adopt:

1. Eliminate or Revise Recommended Definition of "Consultation."

Pages 15 and 16 of the IRS provide the following issue summary:

> *the State should adopt, within the HSF RMA plan, a standing consultation protocol specifying:* Minimum review time frames and information that will be provided (e.g., maps, growth assumptions, economic analysis, habitat modeling); *the state should adopt,*

[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.

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.

Along with a Recommended Change:

Add DNR definition of "Consultation" to Appendix A *Glossary*: "Under existing statutes, regulations, and procedures, the Department of Natural Resources informs other groups of its intention to take a specific action and seeks their advice or assistance. Consultation is not intended to be binding. It is a means of informing affected organizations and individuals about forthcoming decisions and getting the benefit of their expertise. DNR replies to parties offering advice or assistance by informing them the decision and the reasons for which the decision was made or notifying them that the decision and finding are available upon request."

Add description of consultation efforts and public engagement opportunities from current planning effort to Chapter 1, *how this plan was developed* as a reference for future planning efforts.

DFFP consultation obligations arise under statute in the HSF enabling act, at AS 41.15.310[3] and AS 41.15.320.[4] Additionally, under the Forest Resources and Practices Act (FRPA), AS 41.17, DNR is obligated to afford "due deference" to, and recognize the expertise of, ADEC and ADF&G, for management decisions within the scope of those agencies' expertise.[5]

CIV recommends that DFFP eliminates its proposed definition of "Consultation."
The proposed definition does more to confuse rather than clarify DNR's statutory obligations. Elsewhere in the issue response summary, DFFP declines to elaborate on clear statutory guidance through policy ("Consultation requirements for planning and administration processes within the HSFRMA are stated explicitly in statute. There is not a practical benefit to re-stating

[3] ("The division of forestry and fire protection shall 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 Haines State Forest Resource Management Area and the Alaska Chilkat Bald Eagle Preserve for the values for which each is established.").

[4] ("In adopting a forest management plan for the Haines State Forest Resource Management Area under AS 41.17.230, the department shall consult with the Department of Fish and Game and the governing bodies of each municipality in the general area. The Department of Fish and Game shall consult with the department and local fish and game advisory committees, if any, before adopting regulations governing fish and wildlife management in the Haines State Forest Resource Management Area. Regulations may not be adopted by either department without prior review at a public hearing in Haines and Klukwan.").

[5] AS 41.17.098(e) ("In this section, "due deference" means that deference that is appropriate in the context of the agency's expertise and area of responsibility and all the evidence available to support a factual assertion. Where due deference is given, if the commissioner does not agree with a commenting agency, the commissioner shall prepare a written statement of the reasons for the disagreement.").

statutory requirements in policy if no elaboration is required to guide implementation.").[6] CIV agrees that re-stating the statutory obligation to consult, and with whom, is both unnecessary and unhelpful. Introducing a separate policy definition creates uncertainty about whether it merely describes existing requirements or is intended to establish a standard for their implementation, particularly as statutes, regulations, and procedures may change.

CIV is additionally concerned that the proposed language, because of its content and the context in which it is being applied, may do harm to CIV's distinct rights as a political sovereign either expressly or by implication. The State of Alaska has done much less than it could to formalize government-to-government relations with federally-recognized Indian Tribes, especially since the passage of Administrative Order No. 300 under Governor Walker's administration.[7] CIV's participation in the RMP planning and development process has been challenged due to semi-formal state policies disclaiming any responsibility or obligation to meet on a government-to-government basis.

Federal law and regulations already provide definitions and procedural frameworks for consultation.[8] While these laws and regulations do not apply to the State of Alaska, and the government-to-government relationship is indeed primarily between the federal government and federally-recognized Indian Tribes, rooted in the federal trust responsibility, states across the country have done much more to formalize and establish protocols for consultation born of the mutual respect accorded by one sovereign to another.[9] In the absence of such a protocol in the state of Alaska, CIV is concerned that the draft language as it applies to DNR's statutory requirements may confuse or unduly affect the ongoing process of developing a formal, capital "C" Consultation process between the state and Indian Tribes.[10] In other words, we request that DNR account for established frameworks and the State's own prior commitments, including Administrative Order No. 300, when developing policies and definitions to ensure that its language does not inadvertently narrow what "Consultation" with Tribal Governments means, or prejudice future development of government-government relations between the State and Tribes.

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[6] *Issue Response Summary* at 31.
[7] See Alaska Administrative Order No. 300
[8] 36 C.F.R. § 800.16(f)
[9] See Minnesota Government-Government Relationship with Tribal Governments
[10] See Alaska Administrative Order No. 300 ("It is the policy of the State of Alaska to recognize Alaska Tribes' sovereignty by interacting and engaging with Alaska Tribes on a government-to-government basis."). This AO is limited in scope to addressing the "linguistic emergency" of loss and potential extinction of Alaska Native languages. As DFFP has identified in formal correspondence with CIV Tribal Council, "AO 300 does not legally mandate government-to-government consultation for this planning process . . . the State recognizes the relationship and trust responsibility between the United States government and federally recognized [T]ribes, including the Chilkat Indian Village, but the State does not have a concurrent trust relationship with federally recognized [T]ribes . . . while formal consultation under AO 300 is not applicable in this context, we look forward to exploring alternative avenues for dialogue."

DFFP's response also fails to meaningfully respond to the comment's recommendation for developing a replicable *process* by which consultation is accomplished, rather than simply disclaiming what consultation does and does not require. The public comment indicated a desire for clarity and transparency regarding how DNR ensures it is consulting when it develops anything from land management plans to individual projects and resource management decisions. CIV agrees with the public comment that greater clarity and process, available to and understood by the public, can only improve public confidence and ensure that DFFP fulfils its statutory mandate.

This is uniquely true for management decisions in HSF relative to other state lands managed according to principles outlined under the FRPA. As members of staff identified in meetings with CIV, the HSF is the only state forest unit whose enabling legislation mandates consultation with specifically named entities, including the CBEP AC. These are statutory rights-holders who will benefit from a standard process, clearly outlined and identified in the management plan, for the exercise of those rights.

In the alternative to eliminating the proposed definition, CIV recommends amending the proposal to clarify that consultation in this context refers exclusively to DFFP's fulfillment of statutory obligations as identified in AS 41.15.310, AS 41.15.320, and AS 41.17, and not to other forms of consultation in which DFFP may engage.

2. DFFP Has Not Meaningfully Responded to CIV's Public Comment Regarding Traditional Use.

CIV has provided input throughout the RMP draft amendment process, including during community meetings, direct meetings with DFFP, and in public comment, regarding statutory language included in the HSF enabling act at AS 41.15.300 *et seq*. that gives joint priority to multiple use and other beneficial uses, including traditional use, in managing the HSF. CIV's public comment provided 3 pages of input, analysis, and recommendations regarding DFFP's statutory obligations in managing the forest for the continuation of traditional uses. DFFP catalogued these comments in pages 23-26 of the IRS. To each portion of CIV's comment, DFFP prepared the same response:

> In the enabling statues [sic] for HSFRMA, traditionally compatible uses are defined as "[including but not limited to] fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood." These uses are addressed in the management plan through guidelines related to fish and wildlife habitat, recreation, transportation, and forest resources.
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> In addition, AS 38.04.200 requires agencies to manage lands and water to maintain "traditional means of access for traditional outdoor activities." Definitions for

> "Traditional Means of Access" and "Traditional Outdoor Activities" are established in AS 38.04.200(b).

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[13] AS 41.15.315(b).

act, and points to the coordinated management and cooperative agreement powers conferred by statute as mechanisms by which this work can be accomplished.[14]

By failing to capture in the issue response summary multiple legally significant concerns raised during public comment, by relying impermissibly on erroneous interpretations of statutory text, and by failing to provide a sound or clear basis of reasoning for its decisions to adopt or decline to adopt recommendations, DFFP has so far failed to conform with its administrative and procedural requirements in developing the HSF RMA draft management plan. DFFP's responses raise concerns that it is not engaging meaningfully in the public comment and review process that is the bedrock of exercising its legislatively conferred authority in the interest of the citizenry and which is required by AS 41.15 and AS 44.62. Without understanding the basis or reasoning for DFFP's discretionary decisions, there can be no public confidence that DFFP is fulfilling its statutory mandate.

3. CIV Requests Reconsideration and Detailed Reasoning Regarding DFFP's Decision to Decline Including Traditional Ecological Knowledge (TEK) in HSF RMP.

CIV provided recommendations during public comment that DFFP acknowledge the existence and availability of Traditional Ecological Knowledge (TEK) in forest management decisions. CIV identified ways that TEK can be applied consistently within the management framework outlined by the FRPA–specifically, that forest management should include, "to the maximum extent possible, all applicable data and information of applicable disciplines should be updated and used in making decisions relative to the management of forest resources."[15] DFFP provided the following in its issue response summary: "ADNR does not have a legal definition or a management framework to address Traditional Ecological Knowledge (TEK)."[16]

The same was true of adaptive management, which CIV recommended be included as part of DFFP's forest management principles and framework. CIV proposed language to provide a definition of, and role for, adaptive management, drawn from the Tanana Valley State Forest RMP. DFFP responded with concurrence and recommended to "add language to plan defining adaptive management framework and describing forest management implications on state lands."[17]

When asked in direct meetings with CIV Councilmembers, DFFP noted that, without legislative amendments (presumably to FRPA), it could not include or apply TEK in its forest management

[14] AS 41.15.310(b) ("Resource studies undertaken by the department shall be designed to benefit the management and administration of the Haines State Forest Resource Management Area and the Alaska Chilkat Bald Eagle Preserve."); AS 41.15.325 ("The department may enter into cooperative management agreements with a person who holds title to or has a valid entry on land within or adjoining the boundaries of the Haines State Forest Resource Management Area.").
[15] AS 41.17.060(b).
[16] *Issue Response Summary* at 22.
[17] *Id*. at 1.

practices. CIV patently disagrees. The authority already exists under the FRPA, through provisions previously identified that require and encourage interdisciplinary data gathering to inform sound forest management.

CIV requests reconsideration of DFFP's policy stance and conclusory statement that there is no legal definition of, and therefore no possible framework for including, TEK. CIV provided those recommendations in its original public comment, on the same terms and in similar form to its approved and adopted recommendation for the inclusion of adaptive management. ADNR's response is not consistent with the broad latitude its statutory discretion under FRPA affords. Nor must there be a legal definition under Alaska law for forest managers to apply TEK. Indeed, the FRPA does not list or define the forms of data that may contribute to sound forest management. Adaptive management is not defined under statute, yet DFFP is prepared to include it in the HSF RMP. Sound forest management evolves over time in reflection of existing, emerging, and best practices. Just as ADNR can make a discretionary decision to affirm the role of adaptive management in its practices, consistent with FRPA, so too can it acknowledge and include TEK. Other agencies within the state, at the federal level, and in other states, do already look to TEK as an applicable source of data and information on which to base sound forest management decisions. CIV disagrees with ADNR's response as a matter of fact. If DFFP is unwilling to include TEK for another reason, including policy preferences, it must be reflected in the administrative record.

The Haines State Forest, as identified by DFFP personnel during formal meetings, is indeed a unique creation under Alaska law. Its concurrent establishment and coordination with the Alaska Chilkat Bald Eagle Preserve, the requirement for statutorily-mandated consultation with a robust array of governments, boards, and community groups for sound management and management planning, and, perhaps most significantly, the millennia-long stewardship and present-day landowner status of the people of Tlákw Aan within the exterior boundaries of the forest, make planning and decision-making within this state land unit singular. DFFP's issue response summary does not adequately respond to outstanding substantive and procedural concerns raised in previous public comments submitted by CIV and re-iterated in this public comment letter. CIV urges reconsideration of the above-mentioned issues and requests that DFFP respond, on the record, with its basis of reasoning for any decision to adopt or decline adoption of recommended changes.

Gunalchéesh for your consideration of these comments.

Respectfully,

Kimberley A. Strong

Kimberley A. Strong,

Southeast Alaska
Conservation Council

2207 Jordan Avenue
Juneau, AK 99801
907-771-3896
www.seacc.org

Submitted electronically to: dnr.dof.haines@alaska.gov

SEACC Comments Re - Haines State Forest Resource Management Area Plan Amendment

I. Introduction

A. SEACC background and interest

The Southeast Alaska Conservation Council (SEACC) appreciates the opportunity to comment on the Haines State Forest Resource Management Area (HSF RMA) Plan Amendment. SEACC is a regional conservation organization based in Southeast Alaska, with a longstanding commitment to protecting the region's forests, watersheds, fish and wildlife, community uses, and accountable public-resource management.

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. SEACC is 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.

SEACC has engaged substantively in the HSF RMA Plan Amendment process, including sharing the initial input map and intake forms with Tribal and Community partners in Haines, in the March 2026 Notice of End of Targeted Scoping Efforts and submitting comments in the April 2026 Public Review Draft amendment. Notwithstanding this participation, SEACC continues to have significant concerns regarding the proposed amendment's potential effects on the ecological integrity of the Haines State Forest and the State's compliance with applicable legal and planning requirements. We urge the State to ensure that any changes to forest management prescriptions comply with all applicable planning and consultation requirements. The amendment should also provide a transparent and comprehensive evaluation of the anticipated economic benefits, public costs, and ecological and other non-timber resource values associated with the proposed management changes.

B. Purpose of the comments

These comments evaluate the intent-to-adopt package against the Haines State Forest Resource Management Area-specific legislative purposes and consultation duties, state

2207 Jordan Avenue
Juneau, AK 99801
907-771-3896
www.seacc.org

land-use planning requirements, forest-management plan requirements, and implementing regulations governing management-plan contents and amendments. Our review focuses on whether the Division of Forestry and Fire Protection (DoF) has demonstrated compliance with these obligations in developing the proposed amendment, particularly where the amendment would change existing management prescriptions and expand timber-harvest eligibility on lands designated for habitat and recreation.

In doing so, we distinguish between requirements for which compliance is documented, requirements for which compliance is incomplete or contested, and requirements whose satisfaction is not demonstrated in the available public record. With noted deficiencies on behalf of DoF in completing the necessary consultations required to create a plan for adoption, the proposed amendment rests on a flawed foundation of analyses necessary to support adoption. Where the record does not demonstrate compliance, SEACC requests that DoF provide the relevant documentation, explain how its actions satisfy the applicable requirements, and address any remaining deficiencies before proceeding.

C. Principal position

SEACC contends that DoF must defer adoption and reopen the relevant planning decisions until it completes and documents consultation with the governing and advisory bodies identified in the applicable statutes, explains and supports its departure from existing management prescriptions, and provides the required plan-level resource and compatibility analysis. That process should allow meaningful consideration of whether and where to expand timber-harvest eligibility, including the option of retaining existing restrictions, rather than limiting participation to how an expansion will be implemented.

Before seeking adoption, DoF should also publish a consolidated revised draft that incorporates all proposed changes and clearly identifies how the amendment would alter existing management direction. The public and consulting bodies should have sufficient time to evaluate that complete proposal, its supporting analysis, and DoF's responses to their recommendations.

The issue is not whether DoF may revise the HSF RMA management plan, but whether this amendment has been developed through the required process and supported by the analysis necessary to justify its proposed changes. Deferring adoption would provide an opportunity to resolve those questions before the State commits to a consequential change in management direction.

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II. Haines State Forest Resource Management Area Plan Amendment Statutes and Regulations

Public notice, consultation, interdisciplinary planning, and compatibility analyses for multiple use are distinct duties for the Division of Forestry in revising the Haines State Forest Resource Management Area Plan. Meeting with the advisory committees after developing the plan components does not satisfy the requirement for consultation. Similarly, future timber sale review does not innately satisfy the need for a compatibility analysis at the planning level - attempting to utilize future timber sale specific level compatibility assessments inappropriately postpones the required assessment and creates a framework for piecemeal dismantling of other protected uses by decreasing any area-level cumulative impact analysis.

The table below outlines a suite of relevant statutory requirements, their implementing codes and the extent to which the current process for the Haines State Forest Resource Management Area Plan Amendment has satisfied the requirements.

Statute and/or Implementing Code	**Specific language in the statute or code**	**Extent to which DoF has satisfied this requirement**
AS 41.15.310(a): consultation and coordinated administration	DoF "shall 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 coordinated administration "for the values for which each is established."[1]	Specifically not demonstrated: Presentations and meetings show contact, but not consultation while developing policy changes. The Upper Lynn Canal Fish and Game Advisory Committee raised the adequacy of consultation during the process. SEACC contends that DoF must demonstrate a chronology and record of advice sought, received, and addressed in collaboratively developing the plan with advisory committees as required.[2] [3]

[1] Alaska Stat. § 41.15.310, "Coordinated Management," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-15-310/.
[2] Rashah McChesney, "Advisory Committee Wants Better Consultation on New Plan for Haines State Forest," Chilkat Valley News, January 15, 2026, https://www.chilkatvalleynews.com/2026/01/15/advisory-committee-wants-better-consultation-on-new-plan-for-haines-state-forest/
[3] Rashah McChesney, "Advisory Committee, Borough Manager Question Forestry Consultation Process," Chilkat Valley News, February 4, 2026, https://www.chilkatvalleynews.com/2026/02/04/advisory-committee-borough-manager-question-forestry-consultation-process/

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Conservation Council

2207 Jordan Avenue
Juneau, AK 99801
907-771-3896
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AS 41.15.310(b): resource studies	"Resource studies undertaken by the department shall be designed to benefit the management and administration" of both the forest and Preserve.[4]	Not adequately established. Identify the studies supporting the amendment and explain their relevance to both areas.
AS 41.15.320: consultation during plan adoption	In adopting the plan, "the department shall consult with the Department of Fish and Game and the governing bodies of each municipality in the general area."[5]	Significant unresolved municipal-consultation issue. DoF's January record describes consultation with borough staff, while the borough manager subsequently said she did not understand that she was serving as consultation on behalf of the borough. Determine whether later consultation with the governing body remedied this concern. [6] [7]

[4] Alaska Stat. § 41.15.310, "Coordinated Management," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-15-310/.
[5] Alaska Stat. § 41.15.320, "Management Plan and Regulations," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-15-320/.
[6] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "DFFP Scoping Discussion: Haines Borough—HSF RMAManagement Plan Amendment 2026," January 14, 2026, https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf
[7] Brandon Wilks, "Cell Tower Controversy and State Forestry Debate Dominate Marathon Assembly Meeting," KHNS, January 29, 2026, https://khns.org/cell-tower-controversy-and-state-forestry-debate-dominate-marathon-assembly-meeting/

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2207 Jordan Avenue
Juneau, AK 99801
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AS 38.04.065(a), (b)(8): public and governmental participation	Plans are adopted and revised "with local governmental and public involvement"; the commissioner shall "provide for meaningful participation in the planning process" by the listed governments, agencies, landowners, and public.[8]	Public-comment opportunities are documented. Whether participation was meaningful remains contested where DoF framed the discussion around implementing an already-directed expansion. Evaluate which policy choices remained open to change.[9] [10] [11]
AS 38.04.065(b)(1): multiple use and sustained yield	"use and observe the principles of multiple use and sustained yield."[12]	DoF invokes these principles, but invocation alone does not demonstrate how the revised prescriptions maintain the relevant uses and resources. Examine the underlying analysis and resulting management standards.
AS 38.04.065(b)(2): interdisciplinary planning	"consider physical, economic, and social factors affecting the area and involve other agencies and the public in achieving a systematic interdisciplinary approach."[13]	Partially evidenced; adequacy unresolved. The response matrix relies repeatedly on later project review. Identify the interdisciplinary analysis supporting the present plan-wide eligibility change, rather than only future timber-sale design.[14]

[8] Alaska Stat. § 38.04.065, "Land Use Planning and Classification," *2024 Alaska Statutes*, Justia, https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/.
[9] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "Public Review of Haines State Forest RMA Draft Management Plan," Alaska Online Public Notices, April 9, 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=223387
[10] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "Notice of Intent-to-Adopt Comment Period: Haines State Forest Resource Management Area Management Plan Amendment," Alaska Online Public Notices, October 1, 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=225303.
[11] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "DFFP Scoping Discussion: Haines Borough—HSF RMAManagement Plan Amendment 2026," January 14, 2026, https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf
[12] Alaska Stat. § 38.04.065 (2024), "Land Use Planning and Classification," https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/
[13] Alaska Stat. § 38.04.065 (2024), "Land Use Planning and Classification," https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/
[14] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, *Haines State Forest Resource Management Area Management Plan: Public Review Draft Issue Response Summary*, October 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=164265

Southeast Alaska
Conservation Council

2207 Jordan Avenue
Juneau, AK 99801
907-771-3896
www.seacc.org

AS 38.04.065(b)(4)–(6): inventories, uses, and surrounding ownership	"rely, to the extent that it is available, on the inventory of the state land, its resources, and other values"; "consider present and potential uses"; and consider resources and uses of land under other ownership.[15]	Inventory references exist, but a complete resource-and-use assessment has not been verified. Examine fish and wildlife information, recreation and traditional-use inventories, watershed conditions, and surrounding-land relationships—not only merchantable timber.[16]
AS 38.04.065(g): municipal-plan consistency	Each plan "shall be consistent with municipal land use plans to the maximum extent determined consistent with the state interests and the purposes of this chapter."[17]	Not demonstrated in the reviewed materials. Request the municipal-plan comparison and explanation of any inconsistencies. This provision is not an unconditional municipal veto.
11 AAC 55.030(c)(1)–(4), (d): management-plan contents	A management plan must contain the listed area-plan items, including existing uses and ownership, resource potential and uses, "goals and objectives for each resource," and classifications identifying primary and potentially secondary uses.[18]	Requires a complete draft audit. Determine whether newly harvest-eligible areas have resource-specific goals and sufficiently informative assessments, rather than only general forest-wide statements.

[15] Alaska Stat. § 38.04.065 (2024), "Land Use Planning and Classification," https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/
[16] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, *Haines State Forest Resource Management Area Management Plan: Public Review Draft Issue Response Summary*, October 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=164265
[17] Alaska Stat. § 38.04.065 (2024), "Land Use Planning and Classification," https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/
[18] Alaska Admin. Code tit. 11, § 55.030, "Land Use Plan," accessed October 27, 2026, https://www.law.cornell.edu/regulations/alaska/11-AAC-55.030

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2207 Jordan Avenue
Juneau, AK 99801
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11 AAC 55.030(c)(6), (d): management intent and compatibility	Requires "management guidelines and stated management intent" that guide decisions, direct management, and ensure "compatibility among competing land uses."[19]	Substantial unresolved issue. DoF retained broader eligibility while referring compatibility decisions to future sale reviews. Examine whether the plan itself supplies adequate direction for habitat and recreation units.[20]
11 AAC 55.030(f)(1)(A): amendment requirements	A revision is subject to AS 38.04.065. An amendment modifies basic management intent or changes "allowed or prohibited uses, policies, or guidelines." The regulation expressly gives allowing a previously prohibited use as an example.[21]	Compliance not yet demonstrated. Allowing timber harvest in areas where the existing plan prohibits it constitutes a plan amendment, even if the land classifications remain unchanged. DoF must therefore satisfy the planning requirements of AS 38.04.065, including meaningful public and governmental participation, interdisciplinary analysis, and consideration of existing resources and uses. DoF itself describes the proposal as a departure from the existing approach.[22]
AS 41.15.315(a)–(b): Haines management and traditional uses	The area must be managed under multiple use, sustained yield, and AS 41.17; "an opportunity for continued traditional use … at levels and by traditional methods and means is guaranteed."[23]	Requires a specific assessment. Retaining a list of allowed traditional uses does not alone establish that opportunities at the protected levels and methods remain available. Identify affected places, access, resources, and management safeguards.

[19] Alaska Admin. Code tit. 11, § 55.030, "Land Use Plan," accessed October 27, 2026, https://www.law.cornell.edu/regulations/alaska/11-AAC-55.030
[20] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, Haines State Forest Resource Management Area Management Plan: Public Review Draft Issue Response Summary, October 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=164265
[21] Alaska Admin. Code tit. 11, § 55.030, "Land Use Plan," accessed October 27, 2026, https://www.law.cornell.edu/regulations/alaska/11-AAC-55.030
[22] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, *DFFP Scoping Discussion: Haines Borough—HSF RMAManagement Plan Amendment 2026*, January 14, 2026, https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf
[23] Alaska Stat. § 41.15.315 (2024), "Multiple-Use Management," https://law.justia.com/codes/alaska/title-41/chapter-15/article-4/section-41-15-315/

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2207 Jordan Avenue
Juneau, AK 99801
907-771-3896
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AS 41.17.230(a): operational inventory and forest/unit planning	Requires a forest management plan "for each state forest and for each unit"; an "operational level forest inventory shall be completed" before adoption.[24]	Verify the inventory's completion, coverage, methods, and relevance to the areas affected by the amendment. Do not presume that an entirely new inventory is required solely because the plan is being amended.
AS 41.17.230(a): findings of incompatibility	If the commissioner finds incompatibility, the plan must affirmatively state that finding for the specific area and time, with "the reasons and benefits for each finding."[25]	Conditional requirement requiring closer review. Identify actual incompatibilities and how the plan treats them. Do not claim the statute requires such a finding for every harvest proposal or that a blanket statement of compatibility resolves demonstrated conflicts.
AS 41.17.230(c): prior agency and Board review; public hearings	A plan may not be adopted or revised without "prior review by the Board of Forestry and by other appropriate state agencies" and prior public hearings in a nearby community.[26]	Compliance not established; adoption is premature. AS 41.17.230(c) prohibits adoption or revision without prior Board of Forestry and appropriate state-agency review and the required public hearings. DNR must demonstrate that these prerequisites have been met before adopting the amendment. Separately, the unresolved advisory-committee consultation deficiencies identified in this table prevent DNR from establishing compliance with the Haines-specific consultation requirements of AS 41.15.310(a).
AS 41.15.315(e): carbon-project planning	The plan "must identify the land appropriate for the carbon offset project"; DoF "may amend" the plan to allow a project.[27]	Carbon policy has been added, but the adequacy of identifying appropriate lands remains unresolved. The provision does not expressly require expansion of timber-harvest eligibility.

[24] Alaska Stat. § 41.17.230, "Management Plans," current as of January 1, 2025, FindLaw, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-17-230/
[25] Alaska Stat. § 41.17.230, "Management Plans," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-17-230/
[26] Alaska Stat. § 41.17.230, "Management Plans," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-17-230/
[27] Alaska Stat. § 41.15.315 (2024), "Multiple-Use Management," https://law.justia.com/codes/alaska/title-41/chapter-15/article-4/section-41-15-315/

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AS 38.05.945: applicable notice requirements	Notice must provide sufficient information about the action and opportunity to comment; the applicable notice provisions include online posting and additional distribution requirements.[28]	Online review periods and calls for input were documented. The method in which the plan was presented to the public intrinsically negates the inclusion of widespread public criticism. [29] [30]

Additional legal framing

Article VIII establishes the overarching public interest framework predicated upon common-use and sustained yield. For common-use and sustained yield to be adequately assessed, there needs to be a comprehensive data driven analysis of the ecosystem services provided (subsistence, cultural use, etc.) and the habitat provisions required to sustain those resources. As written, the current plan effectively takes the rhetorical argument that timber extraction is one of many uses and therefore fits into a multiple-use framework. This is fundamentally flawed. AS 41.15.315 (b) clearly states "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."

This puts an extra burden upon DoF to ensure that those rights are enshrined in the underlying analyses, consultations, and frameworks for establishing any changes to the HSF RMA Plan Amendment. The process by which these considerations are statutorily guided to be included are from AS 41.15.310 (b): "The division of forestry and fire protection shall 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 Haines State Forest Resource Management Area and the Alaska Chilkat Bald Eagle Preserve for the values for which each is established."

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[28] Alaska Stat. § 38.05.945, "Notice," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-38-public-land/ak-st-sect-38-05-945/

[29] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, "Public Review of Haines State Forest RMA Draft Management Plan," *Alaska Online Public Notices*, April 9, 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=223387

[30] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, "Notice of Intent-to-Adopt Comment Period: Haines State Forest Resource Management Area Management Plan Amendment," *Alaska Online Public Notices*, October 1, 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=225303

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Juneau, AK 99801
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By presenting the created plan to the advisory committees, with little engagement from the onset of the initial planning phase, the current process usurps DoF's ability to deliver on that statutory requirement. Therefore, the current plan cannot be adopted. The process for creating it has not fulfilled the statutory requirements for its creation.

III. Haines State Forest Resource Management Area Plan Amendment History

A. Establishment and earlier planning

The Haines State Forest Resource Management Area was established by the Alaska Legislature in 1982, under Alaska Statutes 41.15.300–41.15.330 to provide for the multiple-use management of state-owned forest resources. At the same time, the Legislature established the adjacent Alaska Chilkat Bald Eagle Preserve under AS 41.21.610–41.21.630, the purpose of which is to protect Chilkat bald eagles and their essential habitats. "Accordingly, 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 reservation of state public domain land and water for bald eagle preserve purposes and state public domain land and water more appropriate for multiple use".[31]

While their boundaries do not overlap, the management plans of the HSF RMA and the Chilkat Bald Eagle Preserve are required to remain coordinated and collaborative in order to ensure consistent management of shared ecological resources and surrounding watersheds. The Division of Forestry and Fire Protection is required to consult with the Division of Parks, the Department of Fish and Game (including local advisory committees), and the Alaska Chilkat Bald Eagle Preserve Advisory Council. The law does this explicitly to promote the "effective, efficient, and coordinated administration of the Haines State Forest Resource Management Area and the Alaska Chilkat Bald Eagle Preserve for the values for which each is established."[32]

The original HSF RMA plan was established in 1985 with an initial framework for land use decisions. The plan was revised and replaced in 2002 with an update to management policies and implementation procedures, done concurrently with the Chilkat Bald Eagle

[31] Alaska Statutes § 41.21.610, "Purpose of AS 41.21.610–41.21.630," accessed October 28, 2026, https://law.justia.com/codes/alaska/title-41/chapter-21/article-6/section-41-21-610/
[32] Alaska Statutes § 41.15.310(a), "Coordinated Management," accessed October 28, 2026, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-15-310/

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2207 Jordan Avenue
Juneau, AK 99801
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Preserve Management Plan and the Northern Southeast Area Plan to improve consistent resource management.[33]

Public and community input played an important role in shaping the 2002 revision and its management prescriptions. The plan amendment process included input from updated wildlife and fisheries research, a Community Resident Survey, a survey of commercial recreation providers, and municipal input. As a result, the plan was able to include specific recommendations grounded in local priorities. For example, recommendations from the Haines City Council on commercial helicopter operations contributed to the plan's special-use designation regulating commercial helicopter activities. The revision also established a designated non-motorized area around Mount Ripinski and introduced restrictions on certain commercial recreation activities. In addition, the upper Chilkoot River area was classified as Wildlife Habitat Land, prohibiting commercial timber harvesting and material sales while prioritizing salmon spawning grounds, bald eagle feeding areas, and moose and bear habitat. [34]

B. Administrative direction and scope of the amendment

DoF's own account two main drivers of the amendment: legislation requiring state forest management plans to address carbon offset projects, and a separate administrative direction to expand the potential for timber harvest on lands classified for Habitat and Recreation. In its February 2026 scoping materials, the Division explained that, although the amendment's timing was connected to the 2023 carbon-offset legislation, "the Division received additional direction late in 2024 … by updating policy that had previously prohibited timber harvest on Habitat and Recreation classified units."[35]

This specification is important because, while SB 48 (2023), Alaska's Carbon Offset Program, does explain why that management plan requires amendment, it does not explain why DoF is choosing to revisit existing restrictions in Habitat and Recreation units. While this is evidence of the amendment's administrative origin, the carbon legislation is not proof by itself that the agency could not consider alternatives that are less compromising to the ecological integrity of the Forest.

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[33] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "Haines State Forest Resource Management Area Management Plan," accessed October 28, 2026, https://forestry.alaska.gov/management/hainesplan.
[34] Alaska Department of Natural Resources, Division of Mining, Land & Water and Division of Forestry, *Haines State Forest Management Plan* (August 2002), https://dnr.alaska.gov/mlw/planning/mgtplans/hsfp/pdf/hsfpfinal.pdf
[35] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "DFFP Scoping Discussion: Haines Borough—HSF RMAManagement Plan Amendment 2026," January 14, 2026, https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf

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Moreover, the available public record does not identify the specific author, date, or written form of the 2024 direction, nor does it reproduce the underlying directive or state its rationale. SEACC therefore requests that the Division disclose the directive and make public any associated correspondence so that the public can fully understand the administrative direction behind the amendment.

C. Scoping, presentations, and objections

SEACC is concerned that the public engagement and scoping process lacks meaningful targeted engagement. In January 2026, the Upper Lynn Canal Advisory Committee voiced objections that their involvement in the engagement process did not amount to a good-faith consultation by DoF, citing that they were reached out to too late and were not provided with detailed information with which they could provide any meaningful input.[36] On January 14, Division staff met with Haines Borough personnel to discuss the proposed policy changes, including allowing timber harvest on Habitat and Recreation classified lands.At the January 27 Assembly meeting, concerns arose regarding the quality and adequacy of engagement, particularly on whether DoF's consultation with staff can even satisfy the requirement to consult with municipal governing bodies.[37]

Subsequent committee engagement has continued, including in February and March meetings with the Upper Lynn Canal Fish and Game Advisory Committee. However, the existence of these meetings does not establish that participants received adequate information *in advance* or had a meaningful opportunity to influence the amendment's scope. SEACC requests that DoF chronologically document the resumed scoping process and subsequent targeted engagement. For each meeting, we urge documentation of who requested the meeting, who attended and in what capacity, what materials were provided beforehand, which choices remained open, and what recommendations resulted.

D. Public review and intent to adopt

The public-review period for the HSF RMA Draft Management Plan began on April 9, 2026 and accepted submissions through June 5, 2026. Following that period, DoF prepared an

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[36] McChesney, Rashah. "Advisory Committee Wants Better Consultation on New Plan for Haines State Forest." Chilkat Valley News, January 15, 2026. https://www.chilkatvalleynews.com/2026/01/15/advisory-committee-wants-better-consultation-on-new-plan-for-haines-state-forest/.

[37] Brandon Wilks, "Cell Tower Controversy and State Forestry Debate Dominate Marathon Assembly Meeting," *KHNS*, January 29, 2026, https://khns.org/cell-tower-controversy-and-state-forestry-debate-dominate-marathon-assembly-meeting/.

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Issue Response Summary (IRS) documenting public comments, the Division's responses, and recommended revisions to the draft.[38]

The IRS identified several revisions, including adding an adaptive-management framework and definition, a definition of consultation, reorganizing carbon-related policies into a separate section on carbon management leasing and carbon offset projects, and providing additional material on cultural resources and climate-adapted forest management. However, the Division recommends retaining several central policies that drew objections. For example, it rejects a proposed moratorium on timber sales in Unit 1 (Kelsall River) and retains the policy allowing forest management activities on Wildlife and Public Recreation lands.

On October 1, 2026, DoF opened a second comment period through November 2, 2026. The Division states that it intends to adopt the April public-review draft as modified by the recommended revisions in the IRS before submitting the plan to the DNR Commissioner's Office for adoption. However, the intent-to-adopt package consists of the original April draft, the IRS response matrix, and replacement or supplementary materials, rather than a single, fully integrated revised management plan. SEACC urges DoF to provide a consolidated version of the proposed final plan, clearly identifying accepted revisions and retained policies so that the public can meaningfully assess the complete proposal before adoption.

IV. Procedural Concerns

A. Consultation was framed around implementation of a directed outcome

§ 41.15.310 mandates that DoF consults with the Alaska Chilkat Bald Eagle Preserve Advisory Council during the plan amendment process. DoF acknowledges this in their scoping discussion:

> "The scoping period is intended to provide members of the public and interest groups such as this one with an opportunity to weigh in on how the directives received by the Division should be implemented."[39]

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[38] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, *Haines State Forest Resource Management Area Management Plan: Public Review Draft Issue Response Summary*, October 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=164265.

[39] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "DFFP Scoping Discussion: Haines Borough—HSF RMAManagement Plan Amendment 2026," January 14, 2026, https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf.forestry.alaska

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DoF also recognizes the magnitude of the proposed changes:

> "We acknowledge that this change in management approach is a big departure from the way the HSF RMA has been managed for decades."[40]

These statements support concern that DoF central policy direction preceded consultation. They acknowledge the breadth of management changes their plan outlines, and yet did not provide any arena for consultation until after it had been drafted. Given the order of these events, the consultation process appears functionally as an opportunity to comment on a predetermined policy direction, rather than as a means to inform the development of the amendment itself in any meaningful way.

Considering this order of events, SEACC raises the question of whether maintaining the existing eligibility restrictions was genuinely available for consideration, or if the directed outcome already foreclosed meaningful consideration of that alternative. If the fundamental policy decisions had already been made before consultation was allowed to shape the outcome, then the scoping process may have circumvented consultation requirements outlined in AK Stat § 41.15.310.

While the January Scoping Discussion did solicit substantive concerns, SEACC is concerned about the scope and decision-making influence of that engagement rather than an absence of discussion itself.[41]

B. Borough-staff engagement was not clearly understood as consultation with the governing body

AK Stat §41.15.320 mandates the DoF consult with "governing bodies of each municipality in the general area" in adopting a forest management plan for the HSF RMA.[5] However, SEACC is concerned that the manner in which this consultation took place is inadequate to ensure the statute's intent. Reporting on the January 27 Assembly meeting, KHNS documented concerns from both borough officials and community members about whether the process constituted genuine consultation with the Borough's elected government:

> "I wanted to make it clear that I did not understand that I was the consultation on behalf of the Haines Borough."
> —Alekka Fullerton, Haines Borough Manager.[42]

[40] Ibid
[41] DFFP Scoping Discussion: Haines Borough, January 14, 2026. https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf.
[42] Wilks, "Cell Tower Controversy and State Forestry Debate."

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> "I do not feel that a conversation between DNR and three members of the borough staff is a consultation with our elected government."
> —Mark Sogge, retired ADF&G biologist.[43]

If borough officials were not aware that their interactions with DNR were intended to constitute formal consultation, or did not understand themselves to be representing the Borough in that capacity, it is unclear how those interactions could satisfy the statute's purpose of engaging municipal governing bodies in the planning process. Moreover, SEACC seeks clarification on if government staff have legal authority to represent a governing body for this purpose. Notably, the Haines Borough Assembly voted 4–2 to request direct engagement to fulfill consultation requirements.[44] It is clear that the Assembly does not feel like they were adequately engaged with and seeks to participate directly in the consultation process.

SEACC therefore urges the DoF to clarify how it determined that the statutory consultation requirement had been met. We urge DoF to engage directly with the Assembly and ensure that the Borough's governing body has the opportunity to provide input before the forest management plan is finalized.

C. Advisory committee concerns were raised contemporaneously

Around the same time that the Haines Borough Assembly raised concerns about the quality of its consultation, the Upper Lynn Canal Fish and Game Advisory Committee (ULCAC) expressed similar concerns.

On January 12, ULCAC sent a letter to the state questioning whether DoF had fulfilled its consultation obligations under AS §41.15.310 and AS §41.15.320. The letter outlines the timeline of the HSF RMA Plan amendment and consultation processes, noting that the amendment process began within DoF in early 2024. Despite this, ULCAC was not contacted about the proposed amendment until January 2026, nearly two years later and just weeks before the draft plan was scheduled to be released to the public[45].

In addition to the delayed engagement, ULCAC stated that it had not received sufficient detailed information to provide meaningful input on the proposed amendment. As a

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[43] Ibid
[44] Ibid
[45] Upper Lynn Canal Fish and Game Advisory Committee, "Upper Lynn Canal Fish and Game Advisory Committee to the Division of Forestry on the Haines State Forest Plan Amendment," DocumentCloud, accessed October 28, 2026, https://www.documentcloud.org/documents/26868617-upper-lynn-canal-fish-and-game-advisory-committee-to-the-division-of-forestry-on-the-haines-state-forest-plan-amendment/.

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result, the committee questioned whether DoF had met its obligation to consult with ULCAC in good faith.[46]

To address these concerns, ULCAC requested that DoF provide the information, studies, and reports used to justify the proposed amendment. The committee will review these materials and provide the DNR with additional fish and wildlife studies and local knowledge to help inform management decisions. ULCAC also requested an opportunity to review the revised draft plan before the start of the formal comment period. This would enable more meaningful participation and better fulfill the intent of the HSF's founding legislation, applicable Alaska statutes, and the current Management Plan.[47]

D. Misalignment undermines confidence in public participation

DoF has inappropriately reinterpreted AS 41.15.310(a) to effectively render itself immune to the requirement. Their response in the Issue Response Summary establishes that "DFFP interprets "effective, efficient, and coordinated administration" (AS 41.15.310) to describe the expectations for implementation of management policy within the HSF RMA but does not apply to the development of policy. DFFP consults Fish and Game Advisory councils through the local ADFG habitat biologist during inter-agency review of decision documents and through their presence on the Alaska Chilkat Bald Eagle Preserve Advisory Council."[48] That interpretation explicitly omits the first aspect of the statute, which states "(a)The division of forestry and fire protection shall 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..."[49]

[46] Ibid
[47] Ibid
[48] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, *Haines State Forest Resource Management Area Management Plan: Public Review Draft Issue Response Summary*, October 2026, 9, https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=164265.
[49] Alaska Statutes § 41.15.310(a), "Coordinated Management"

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Haines State Forest Resource Management Area Management Plan
Public Review Draft Issue Response Summary
October 2026

HSF RMA MP Issue Response Summary and Recommended Changes			
General Comments			
Subject	**Issue Summary**	**Response**	**Recommended Change**
Consultation	the State should adopt, within the HSF RMA plan, a standing consultation protocol specifying: 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.	Meetings with the Chilkat Bald Eagle Preserve Advisory Council (CBEP AC) serve this purpose and include representation from all the entities described except DEC. The CBEP AC may choose to invite relevant DEC staff to attend one meeting annually to participate in discussions related to the administration of CBEP and HSFRMA.	No change
Planning Process	Respect the input of local communities and make appropriate changes to the proposed plan.	Concur	No change

Haines State Forest Resource Management Area Management Plan
Public Review Draft Issue Response Summary
October 2026

HSF RMA MP Issue Response Summary and Recommended Changes			
General Comments			
Subject	**Issue Summary**	**Response**	**Recommended Change**
Consultation	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." However, as detailed by the Upper Lynn Canal Fish and Game Advisory Council and reported by the Chilkat Valley News, HSF appears to have treated its obligations as boxes to check rather than legitimate consultation duties.	DFFP interprets "effective, efficient, and coordinated administration" (AS 41.15.310) to describe the expectations for implementation of management policy within the HSFRMA but does not apply to the development of policy. DFFP consults Fish and Game Advisory councils through the local ADFG habitat biologist during inter-agency review of decision documents and through their presence on the Alaska Chilkat Bald Eagle Preserve Advisory Council.	No change

Figure 1. The excerpts from the Haines State Forest Resource Management Area Management Plan Public Review Draft Issue Response Summary October 2026 where the Division explicitly notes "no change" in their recommendations based on the concerns around inadequate consultation.

Consultation is inherently an informing activity, which means it must occur within a timeframe in which such input can be utilized in the formation of policies. Deferring consultation until implementation denies the named advisory bodies a meaningful role in shaping the policies that govern management, undermining confidence that participation can influence the outcome and is antithetical to, as the statute notes, "the values for which each is established".[50] DoF may not simply reinterpret the definition of consultation to include post hoc informing of the bodies meant to inform direction and scope.

[50] Ibid

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E. The amendment changes management intent despite retaining classifications

Although the proposed amendment retains the existing land classifications within the HSF RMA, it may substantively undermine the protections and management priorities intended by those classifications.[51] Under 11 AAC 55.030(f)(1)(A), an amendment includes changes to the uses allowed or prohibited under a management plan. The regulation specifically identifies allowing a previously prohibited use as an example of a change requiring an amendment.

For example, lands classified as Habitat and Recreation contain existing management prescriptions that restrict timber harvesting to prioritize wildlife habitat, recreation, and other non-timber resource values. By expanding potential timber-harvest eligibility within these units, the proposed amendment would change how these lands may be managed, regardless of whether their classification labels remain the same. Retaining the Habitat or Recreation classification does not, by itself, ensure that its operative protection will remain intact.

SEACC is also concerned that the proposed changes may depart from management decisions established through the 2002 planning process, which incorporated extensive community input and resource studies. Accordingly, SEACC requests that DoF provide a comprehensive assessment of the amendment's implications, including a unit-by-unit comparison of existing and proposed management prescriptions and an evaluation of how the revised provisions would affect the purposes and resource values for which each area was designated. DoF should also explain how and why the proposed changes depart from the management decisions established through earlier planning and consultation processes, including the rationale and supporting evidence for revising those decisions.

F. Required management assessments are incomplete or insufficiently demonstrated

DoF has insufficiently demonstrated or has left incomplete many required management assessments. The department should fill in these gaps immediately before proceeding with the plan amendment process:

AS 38.04.065(b)(2) requires an interdisciplinary planning process that considers the physical, economic, and social factors when developing regional land-use plans.[13] This has been partially evidenced in the IRS response matrix, but currently remains inadequate. The response matrix relies repeatedly on later project review, rather than the current,

[51] "11 AAC 55.030 - Land Use Plan." Legal Information Institute. Accessed October 29, 2026. https://www.law.cornell.edu/regulations/alaska/11-AAC-55.030.

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plan-wide proposed eligibility changes. DoF must identify the interdisciplinary analysis of the currently proposed changes.

AS 38.04.065(b)(4)–(6) requires regional land use plans to rely on "the inventory of the state land, its resources, and other values."[15] When relying on these inventories, land use planners are required to consider present and future uses, as well as the resources and uses of the land under other ownership.[15] While inventory references exist, a complete resource-and-use assessment has not been verified. DoF must examine available fish and wildlife information, recreation and traditional-use inventories, watershed conditions, and surrounding-land relationships rather than solely relying on merchantable timber.

11 AAC 55.030(c)(1)–(4), (d) requires that management plans contain the listed area-plan items, along with "goals and objectives for each resource."[18] This requires a complete draft audit; DoF must determine whether newly harvest-eligible areas have resource-specific goals and sufficiently informative assessments, rather than only general forest-wide statements.

11 AAC 55.030(c)(6), (d) Requires "management guidelines and stated management intent" that guide decisions, direct management, and ensure "compatibility among competing land uses."[19] This has been left unresolved, as DoF retained broader eligibility while deferring compatibility decisions to future sale reviews.The department must examine whether the currently proposed plan supplies adequate direction to each individually managed unit. This must be done particularly with regard to Habitat and Recreation units, which contain specific management prescriptions that restrict timber harvesting to prioritize wildlife habitat, recreation, and other non-timber resource values. DoF must examine whether the proposed changes supply adequate direction to retain these management guidelines.

AS 41.15.315(a)–(b) requires that the HSF RMA must be managed "under the principles of multiple use and sustained yield and under AS 41.17."[23] AS 41.17 stipulates "an opportunity for continued traditional use … at levels and by traditional methods and means is guaranteed."[23] This requires a specific assessment; DoF must identify affected places, access, resources, and management safeguards. Merely retaining a list of allowed traditional uses does not sufficiently establish that opportunities at the protected levels and methods remain available under new management prescriptions.

AS 41.17.230(a) requires, for each state forest and each unit, and before adoption of a forest management plan, an operational level forest inventory.[24] DoF must verify the inventory's completion, coverage, methods, and relevance to the areas affected by the amendment.

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DoF must also verify management prescriptions under the principles of multiple use and sustained yield, as stipulated in AS 41.15.315(a)–(b) and AS 38.04.065(b)(1). While DoF invokes these principles, invocation alone does not demonstrate how the revised prescriptions maintain the relevant uses and resources. DoF must examine the underlying analysis and resulting management standards to ensure that the prescriptions are supported by the available evidence and appropriately balance multiple use.

AS 41.17.230(a) establishes that, if permitted uses of a forest management plan are found to be incompatible with the primary purpose of state forests under AS 41.17.200, then "the commissioner shall affirmatively state in the management plan that finding of incompatibility for the specific area where the incompatibility is anticipated to exist and the time period when the incompatibility is anticipated to exist together with the reasons and benefits for each finding."[24] This requirement necessitates closer review; DoF must identify actual incompatibilities and how the plan treats them, rather than providing a blanked statement of compatibility that does not resolve demonstrated conflicts.

AS 38.04.065 requires that the regional land-use plan must establish consistency with applicable municipal land-use plans.[52] DoF must verify this requirement as well as adequate consultation and coordination with the Alaska Chilkat Bald Eagle Preserve Advisory Council, as outlined in AS 41.15.310 (b). DoF must demonstrate that the revised management prescriptions coordinate with the Preserve's statutory purposes and reflect meaningful engagement with the Advisory Council.

A future timber-sale-level analysis cannot substitute for these required assessments at the planning stage. The present question is whether the proposed amendment, on its own terms and based on the available resource information, satisfies the statutory and regulatory requirements governing plan development and establishes adequate management direction before additional lands become eligible for harvest. Deferring these assessments until individual sales are proposed would effectively undermine the purpose of the current legal requirements by shifting substantive planning obligations to a later project-review stage, when the broader decision to expand harvest eligibility has already been made. DoF must therefore resolve these deficiencies in the present amendment process and demonstrate that the revised plan satisfies applicable legal requirements and management assessments before proceeding with the amendment process.

V. Remedy

[52] Alaska Statutes § 38.04.065, "Land Use Planning and Classification," accessed October 28, 2026, https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/

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A. Defer adoption and reopen the affected policy choices

SEACC contends that DoF must defer adoption of the amendment until the consultation process is complete and the relevant analysis has been conducted in order for the plan to be valid under the statutory requirements guiding its creation. Adoption should remain suspended until affected stakeholders have had a meaningful opportunity to participate and there has been adequate consideration of the resulting information.

Pending completion of the amendment process, the existing prescriptions should remain in effect. This ensures that any subsequent policy change rests on a procedurally sound and adequately informed decision.

DoF should also make clear that the consultation is genuinely open to reconsideration of the underlying policy choices. The available alternatives must include retaining the existing restrictions, as well as modifying the implementation of expanded eligibility. The process should not be confined to determining how an expansion will be implemented. The substantive question requiring consideration is whether to expand eligibility.

B. Complete documented consultation

SEACC asserts that DoF must complete documented consultation with each body identified in § 41.15.310- § 41.15.320. For each meeting, DoF should confirm the purpose, authority, participants, and decisions open for discussion. Participants should be supplied with usable materials and reasonable deliberation time. After each meeting, DoF should publish the recommendations advised by the consultant as well as written explanations outlining next steps regarding the recommendations.

In addition, DoF must distinguish input from municipal staff to governing-body consultation. Input from advisory committees must also be distinguished from input from agency-staff review.

C. Complete a management-unit comparison and assessment

SEACC requests that DoF publish an existing-versus-proposed prescription crosswalk which clearly identifies proposed changes to management areas. The documents currently available in the intent-to-adopt package do not provide a single, fully integrated revised management plan. Instead, the package consists of a patchwork of documents, including of the original April draft, the IRS response matrix, and various replacement and supplemental materials. As a result, members of the public must piece together multiple documents to determine which provisions have changed, which prescriptions remain in effect, and how the proposed revisions affect individual management units. This approach

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creates an unnecessary barrier to engagement by placing the burden on the public to reconstruct the proposed plan and identify substantive changes. Without a consolidated comparison, it is difficult for the public to understand the full scope of the proposed revisions, evaluate their implications for individual management units, or provide informed and substantive comments.

In addition, DoF should publish a map identifying all newly eligible areas under the proposed forest management plan and clearly identify any affected habitat, recreation, and traditional-use values as well as how decisions are assessed for compatibility among competing uses.[53] For each newly eligible area, DoF should explain how the proposed management changes comply with applicable compatibility standards and remain consistent with the primary purpose of state forests established under AS 41.17.200. This explanation should identify relevant constraints, describe the circumstances under which a proposed treatment must be modified or rejected, and address any required findings of incompatibility where the applicable statutory conditions are met.

D. Evaluate genuine alternatives

SEACC requests that DoF evaluate a meaningful range of alternatives before proceeding with the proposed expansion of timber-harvest eligibility. Rather than treating the expansion as a predetermined outcome, the division should include in the planning process a substantive consideration of whether the existing management approach should be retained or modified. DoF should meaningfully consider that the current approach can allow for adequate resource management and extraction needs without unnecessarily compromising wildlife habitat, recreation, and other non-timber resource values.

Alternatives may include:

- Retain existing harvest-eligibility restrictions.
- Permit narrowly defined restoration or hazard-reduction exceptions.
- Make evidence-supported, unit-specific changes.
- Adopt the broader proposed expansion only if adequately justified.

Consistent with the planning duties outlined in AS 38.04.065, each alternative should be evaluated in light of its anticipated physical, economic, and social consequences, as well as its effects on timber resources, wildlife habitat, recreation, traditional uses, and other relevant resource values.[13] This analysis would allow for a transparent determination of whether the direction of the proposed amendment represents the most appropriate management approach.

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[53] Alaska Administrative Code, tit. 11, § 55.030(c)(6), "Land Use Plan," accessed October 28, 2026, https://www.law.cornell.edu/regulations/alaska/11-AAC-55.030.

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E. Verify remaining procedural prerequisites

DoF should verify the remaining procedural prerequisites before proceeding with the amendment process. DoF should document the appropriate agency review, including with the division of parks, the Department of Fish and Game, including each local fish and game advisory committee with jurisdiction in the area, the Alaska Chilkat Bald Eagle Preserve Advisory Council, as well as the the governing bodies of each municipality in the general area. These are outlined in AS 41.15.310 and AS 41.15.320.

In addition, DoF must establish compliance with AS 41.15.320, which necessitates prior review at public hearings in Haines and Klukwan. DoF must verify that adequate notice has been provided and establish consistency with applicable municipal land use plans, pursuant to AS 38.04.065.

F. Publish an integrated revised draft and reopen review

SEACC requests that DoF publish an integrated revised draft of the HSF RMA Plan Amendment, consisting of a consolidated plan with an existing-versus-proposed prescription crosswalk, which should clearly identify proposed changes to management areas. DoF should also make available all updated maps and land classification orders, along with the information, reports, and studies used to justify reclassification. This will allow the public to reasonably understand the full scope of the proposed revisions and provide informed and substantive comments.

SEACC requests that DoF reopen a review period sufficient for the revised material and allow adequate time for public comment before proceeding with the plan process.

DoF should also publish a consultation record demonstrating adequate, meaningful engagement with all bodies identified in AS 41.15.310-§ 41.15.320 and further reinforced by AS 41.17.230(c). Such a consultation record should include: 1) A change log noting the input and resulting policy adjustments based on input from the advisory committees, borough officials, and the public, as well as 2) a response matrix explaining how substantive recommendations affected the plan. Crucially, this record must establish that consultation occurs prior to plan development components to establish that the input from consultation drives the framework for establishing policy changes. This is an explicit requirement under AS 41.15.310(a) that "The division of forestry and fire protection shall 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

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administration of the Haines State Forest Resource Management Area and the Alaska Chilkat Bald Eagle Preserve for the values for which each is established."[54]

VI. Conclusion

SEACC is committed to durable, evidence supported resource management and functioning public institutions. The question is not whether DoF may revise the Haines State Forest management plan, but whether it has fulfilled the consultation and planning obligations governing a consequential change in management direction. Revising the allocation of forest resources and uses requires an adequate planning record, regardless of whether existing land classifications remain unchanged. Before adoption, DoF must demonstrate that affected governing and advisory bodies had a meaningful opportunity to inform the proposed management direction. Providing notice and conducting presentations does not demonstrate adequate consultation.

DoF must demonstrate that the revised management prescriptions are supported by the assessments and management standards required by law. SEACC therefore contends that DoF must defer the plan amendment process until an adequate demonstration of completed consultation, documented analysis, and renewed public review.

Respectfully submitted,

Tyler Breen
Policy Analyst
Southeast Alaska Conservation Council

Hannah Gilmer
Policy Fellow
Southeast Alaska Conservation Council

[54] Alaska Statutes § 41.15.310(a), "Coordinated Management," accessed October 28, 2026, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-15-310/

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Dear Division of Forestry and Fire Protection,

Please find attached the Southeast Alaska Conservation Council's comments on the Notice of Intent to Adopt the Haines State Forest Resource Management Area Management Plan Amendment. Please confirm receipt of this email and the attached comments.

SEACC's central concern is that the amendment has not been developed in accordance with the statutory consultation and planning requirements governing its adoption. In particular, SEACC contends that the Division has not fulfilled its obligation to meaningfully consult with the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagle Preserve Advisory Council in developing the proposed management changes. Presentations and opportunities to comment on an established policy direction do not substitute for consultation that can shape that direction.

Accordingly, SEACC urges the Division to defer adoption until it has completed and documented the required consultation, addressed the analytical deficiencies identified in our comments, and provided an integrated revised draft for renewed public review.

Thank you for considering our comments. We remain available to discuss our concerns or clarify any points raised in the attached submission.

Sincerely,
Tyler

--

Tyler Breen
[redacted]

Southeast Alaska
Conservation Council

2207 Jordan Avenue
Juneau, AK 99801
907-771-3896
www.seacc.org

Submitted electronically to: dnr.dof.haines@alaska.gov

SEACC Comments Re - Haines State Forest Resource Management Area Plan Amendment

I. Introduction

A. SEACC background and interest

The Southeast Alaska Conservation Council (SEACC) appreciates the opportunity to comment on the Haines State Forest Resource Management Area (HSF RMA) Plan Amendment. SEACC is a regional conservation organization based in Southeast Alaska, with a longstanding commitment to protecting the region's forests, watersheds, fish and wildlife, community uses, and accountable public-resource management.

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. SEACC is 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.

SEACC has engaged substantively in the HSF RMA Plan Amendment process, including sharing the initial input map and intake forms with Tribal and Community partners in Haines, in the March 2026 Notice of End of Targeted Scoping Efforts and submitting comments in the April 2026 Public Review Draft amendment. Notwithstanding this participation, SEACC continues to have significant concerns regarding the proposed amendment's potential effects on the ecological integrity of the Haines State Forest and the State's compliance with applicable legal and planning requirements. We urge the State to ensure that any changes to forest management prescriptions comply with all applicable planning and consultation requirements. The amendment should also provide a transparent and comprehensive evaluation of the anticipated economic benefits, public costs, and ecological and other non-timber resource values associated with the proposed management changes.

B. Purpose of the comments

These comments evaluate the intent-to-adopt package against the Haines State Forest Resource Management Area-specific legislative purposes and consultation duties, state

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land-use planning requirements, forest-management plan requirements, and implementing regulations governing management-plan contents and amendments. Our review focuses on whether the Division of Forestry and Fire Protection (DoF) has demonstrated compliance with these obligations in developing the proposed amendment, particularly where the amendment would change existing management prescriptions and expand timber-harvest eligibility on lands designated for habitat and recreation.

In doing so, we distinguish between requirements for which compliance is documented, requirements for which compliance is incomplete or contested, and requirements whose satisfaction is not demonstrated in the available public record. With noted deficiencies on behalf of DoF in completing the necessary consultations required to create a plan for adoption, the proposed amendment rests on a flawed foundation of analyses necessary to support adoption. Where the record does not demonstrate compliance, SEACC requests that DoF provide the relevant documentation, explain how its actions satisfy the applicable requirements, and address any remaining deficiencies before proceeding.

C. Principal position

SEACC contends that DoF must defer adoption and reopen the relevant planning decisions until it completes and documents consultation with the governing and advisory bodies identified in the applicable statutes, explains and supports its departure from existing management prescriptions, and provides the required plan-level resource and compatibility analysis. That process should allow meaningful consideration of whether and where to expand timber-harvest eligibility, including the option of retaining existing restrictions, rather than limiting participation to how an expansion will be implemented.

Before seeking adoption, DoF should also publish a consolidated revised draft that incorporates all proposed changes and clearly identifies how the amendment would alter existing management direction. The public and consulting bodies should have sufficient time to evaluate that complete proposal, its supporting analysis, and DoF's responses to their recommendations.

The issue is not whether DoF may revise the HSF RMA management plan, but whether this amendment has been developed through the required process and supported by the analysis necessary to justify its proposed changes. Deferring adoption would provide an opportunity to resolve those questions before the State commits to a consequential change in management direction.

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II. Haines State Forest Resource Management Area Plan Amendment Statutes and Regulations

Public notice, consultation, interdisciplinary planning, and compatibility analyses for multiple use are distinct duties for the Division of Forestry in revising the Haines State Forest Resource Management Area Plan. Meeting with the advisory committees after developing the plan components does not satisfy the requirement for consultation. Similarly, future timber sale review does not innately satisfy the need for a compatibility analysis at the planning level - attempting to utilize future timber sale specific level compatibility assessments inappropriately postpones the required assessment and creates a framework for piecemeal dismantling of other protected uses by decreasing any area-level cumulative impact analysis.

The table below outlines a suite of relevant statutory requirements, their implementing codes and the extent to which the current process for the Haines State Forest Resource Management Area Plan Amendment has satisfied the requirements.

Statute and/or Implementing Code	**Specific language in the statute or code**	**Extent to which DoF has satisfied this requirement**
AS 41.15.310(a): consultation and coordinated administration	DoF "shall 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 coordinated administration "for the values for which each is established."[1]	Specifically not demonstrated: Presentations and meetings show contact, but not consultation while developing policy changes. The Upper Lynn Canal Fish and Game Advisory Committee raised the adequacy of consultation during the process. SEACC contends that DoF must demonstrate a chronology and record of advice sought, received, and addressed in collaboratively developing the plan with advisory committees as required.[2] [3]

[1] Alaska Stat. § 41.15.310, "Coordinated Management," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-15-310/.
[2] Rashah McChesney, "Advisory Committee Wants Better Consultation on New Plan for Haines State Forest," Chilkat Valley News, January 15, 2026, https://www.chilkatvalleynews.com/2026/01/15/advisory-committee-wants-better-consultation-on-new-plan-for-haines-state-forest/
[3] Rashah McChesney, "Advisory Committee, Borough Manager Question Forestry Consultation Process," Chilkat Valley News, February 4, 2026, https://www.chilkatvalleynews.com/2026/02/04/advisory-committee-borough-manager-question-forestry-consultation-process/

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AS 41.15.310(b): resource studies	"Resource studies undertaken by the department shall be designed to benefit the management and administration" of both the forest and Preserve.[4]	Not adequately established. Identify the studies supporting the amendment and explain their relevance to both areas.
AS 41.15.320: consultation during plan adoption	In adopting the plan, "the department shall consult with the Department of Fish and Game and the governing bodies of each municipality in the general area."[5]	Significant unresolved municipal-consultation issue. DoF's January record describes consultation with borough staff, while the borough manager subsequently said she did not understand that she was serving as consultation on behalf of the borough. Determine whether later consultation with the governing body remedied this concern. [6] [7]

[4] Alaska Stat. § 41.15.310, "Coordinated Management," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-15-310/.
[5] Alaska Stat. § 41.15.320, "Management Plan and Regulations," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-15-320/.
[6] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "DFFP Scoping Discussion: Haines Borough—HSF RMAManagement Plan Amendment 2026," January 14, 2026, https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf
[7] Brandon Wilks, "Cell Tower Controversy and State Forestry Debate Dominate Marathon Assembly Meeting," KHNS, January 29, 2026, https://khns.org/cell-tower-controversy-and-state-forestry-debate-dominate-marathon-assembly-meeting/

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AS 38.04.065(a), (b)(8): public and governmental participation	Plans are adopted and revised "with local governmental and public involvement"; the commissioner shall "provide for meaningful participation in the planning process" by the listed governments, agencies, landowners, and public.[8]	Public-comment opportunities are documented. Whether participation was meaningful remains contested where DoF framed the discussion around implementing an already-directed expansion. Evaluate which policy choices remained open to change.[9] [10] [11]
AS 38.04.065(b)(1): multiple use and sustained yield	"use and observe the principles of multiple use and sustained yield."[12]	DoF invokes these principles, but invocation alone does not demonstrate how the revised prescriptions maintain the relevant uses and resources. Examine the underlying analysis and resulting management standards.
AS 38.04.065(b)(2): interdisciplinary planning	"consider physical, economic, and social factors affecting the area and involve other agencies and the public in achieving a systematic interdisciplinary approach."[13]	Partially evidenced; adequacy unresolved. The response matrix relies repeatedly on later project review. Identify the interdisciplinary analysis supporting the present plan-wide eligibility change, rather than only future timber-sale design.[14]

[8] Alaska Stat. § 38.04.065, "Land Use Planning and Classification," *2024 Alaska Statutes*, Justia, https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/.
[9] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "Public Review of Haines State Forest RMA Draft Management Plan," Alaska Online Public Notices, April 9, 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=223387
[10] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "Notice of Intent-to-Adopt Comment Period: Haines State Forest Resource Management Area Management Plan Amendment," Alaska Online Public Notices, October 1, 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=225303.
[11] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "DFFP Scoping Discussion: Haines Borough—HSF RMAManagement Plan Amendment 2026," January 14, 2026, https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf
[12] Alaska Stat. § 38.04.065 (2024), "Land Use Planning and Classification," https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/
[13] Alaska Stat. § 38.04.065 (2024), "Land Use Planning and Classification," https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/
[14] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, *Haines State Forest Resource Management Area Management Plan: Public Review Draft Issue Response Summary*, October 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=164265

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AS 38.04.065(b)(4)–(6): inventories, uses, and surrounding ownership	"rely, to the extent that it is available, on the inventory of the state land, its resources, and other values"; "consider present and potential uses"; and consider resources and uses of land under other ownership.[15]	Inventory references exist, but a complete resource-and-use assessment has not been verified. Examine fish and wildlife information, recreation and traditional-use inventories, watershed conditions, and surrounding-land relationships—not only merchantable timber.[16]
AS 38.04.065(g): municipal-plan consistency	Each plan "shall be consistent with municipal land use plans to the maximum extent determined consistent with the state interests and the purposes of this chapter."[17]	Not demonstrated in the reviewed materials. Request the municipal-plan comparison and explanation of any inconsistencies. This provision is not an unconditional municipal veto.
11 AAC 55.030(c)(1)–(4), (d): management-plan contents	A management plan must contain the listed area-plan items, including existing uses and ownership, resource potential and uses, "goals and objectives for each resource," and classifications identifying primary and potentially secondary uses.[18]	Requires a complete draft audit. Determine whether newly harvest-eligible areas have resource-specific goals and sufficiently informative assessments, rather than only general forest-wide statements.

[15] Alaska Stat. § 38.04.065 (2024), "Land Use Planning and Classification," https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/
[16] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, *Haines State Forest Resource Management Area Management Plan: Public Review Draft Issue Response Summary*, October 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=164265
[17] Alaska Stat. § 38.04.065 (2024), "Land Use Planning and Classification," https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/
[18] Alaska Admin. Code tit. 11, § 55.030, "Land Use Plan," accessed October 27, 2026, https://www.law.cornell.edu/regulations/alaska/11-AAC-55.030

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11 AAC 55.030(c)(6), (d): management intent and compatibility	Requires "management guidelines and stated management intent" that guide decisions, direct management, and ensure "compatibility among competing land uses."[19]	Substantial unresolved issue. DoF retained broader eligibility while referring compatibility decisions to future sale reviews. Examine whether the plan itself supplies adequate direction for habitat and recreation units.[20]
11 AAC 55.030(f)(1)(A): amendment requirements	A revision is subject to AS 38.04.065. An amendment modifies basic management intent or changes "allowed or prohibited uses, policies, or guidelines." The regulation expressly gives allowing a previously prohibited use as an example.[21]	Compliance not yet demonstrated. Allowing timber harvest in areas where the existing plan prohibits it constitutes a plan amendment, even if the land classifications remain unchanged. DoF must therefore satisfy the planning requirements of AS 38.04.065, including meaningful public and governmental participation, interdisciplinary analysis, and consideration of existing resources and uses. DoF itself describes the proposal as a departure from the existing approach.[22]
AS 41.15.315(a)–(b): Haines management and traditional uses	The area must be managed under multiple use, sustained yield, and AS 41.17; "an opportunity for continued traditional use … at levels and by traditional methods and means is guaranteed."[23]	Requires a specific assessment. Retaining a list of allowed traditional uses does not alone establish that opportunities at the protected levels and methods remain available. Identify affected places, access, resources, and management safeguards.

[19] Alaska Admin. Code tit. 11, § 55.030, "Land Use Plan," accessed October 27, 2026, https://www.law.cornell.edu/regulations/alaska/11-AAC-55.030
[20] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, Haines State Forest Resource Management Area Management Plan: Public Review Draft Issue Response Summary, October 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=164265
[21] Alaska Admin. Code tit. 11, § 55.030, "Land Use Plan," accessed October 27, 2026, https://www.law.cornell.edu/regulations/alaska/11-AAC-55.030
[22] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, *DFFP Scoping Discussion: Haines Borough—HSF RMAManagement Plan Amendment 2026*, January 14, 2026, https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf
[23] Alaska Stat. § 41.15.315 (2024), "Multiple-Use Management," https://law.justia.com/codes/alaska/title-41/chapter-15/article-4/section-41-15-315/

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AS 41.17.230(a): operational inventory and forest/unit planning	Requires a forest management plan "for each state forest and for each unit"; an "operational level forest inventory shall be completed" before adoption.[24]	Verify the inventory's completion, coverage, methods, and relevance to the areas affected by the amendment. Do not presume that an entirely new inventory is required solely because the plan is being amended.
AS 41.17.230(a): findings of incompatibility	If the commissioner finds incompatibility, the plan must affirmatively state that finding for the specific area and time, with "the reasons and benefits for each finding."[25]	Conditional requirement requiring closer review. Identify actual incompatibilities and how the plan treats them. Do not claim the statute requires such a finding for every harvest proposal or that a blanket statement of compatibility resolves demonstrated conflicts.
AS 41.17.230(c): prior agency and Board review; public hearings	A plan may not be adopted or revised without "prior review by the Board of Forestry and by other appropriate state agencies" and prior public hearings in a nearby community.[26]	Compliance not established; adoption is premature. AS 41.17.230(c) prohibits adoption or revision without prior Board of Forestry and appropriate state-agency review and the required public hearings. DNR must demonstrate that these prerequisites have been met before adopting the amendment. Separately, the unresolved advisory-committee consultation deficiencies identified in this table prevent DNR from establishing compliance with the Haines-specific consultation requirements of AS 41.15.310(a).
AS 41.15.315(e): carbon-project planning	The plan "must identify the land appropriate for the carbon offset project"; DoF "may amend" the plan to allow a project.[27]	Carbon policy has been added, but the adequacy of identifying appropriate lands remains unresolved. The provision does not expressly require expansion of timber-harvest eligibility.

[24] Alaska Stat. § 41.17.230, "Management Plans," current as of January 1, 2025, FindLaw, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-17-230/
[25] Alaska Stat. § 41.17.230, "Management Plans," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-17-230/
[26] Alaska Stat. § 41.17.230, "Management Plans," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-17-230/
[27] Alaska Stat. § 41.15.315 (2024), "Multiple-Use Management," https://law.justia.com/codes/alaska/title-41/chapter-15/article-4/section-41-15-315/

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AS 38.05.945: applicable notice requirements	Notice must provide sufficient information about the action and opportunity to comment; the applicable notice provisions include online posting and additional distribution requirements.[28]	Online review periods and calls for input were documented. The method in which the plan was presented to the public intrinsically negates the inclusion of widespread public criticism. [29] [30]

Additional legal framing

Article VIII establishes the overarching public interest framework predicated upon common-use and sustained yield. For common-use and sustained yield to be adequately assessed, there needs to be a comprehensive data driven analysis of the ecosystem services provided (subsistence, cultural use, etc.) and the habitat provisions required to sustain those resources. As written, the current plan effectively takes the rhetorical argument that timber extraction is one of many uses and therefore fits into a multiple-use framework. This is fundamentally flawed. AS 41.15.315 (b) clearly states "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."

This puts an extra burden upon DoF to ensure that those rights are enshrined in the underlying analyses, consultations, and frameworks for establishing any changes to the HSF RMA Plan Amendment. The process by which these considerations are statutorily guided to be included are from AS 41.15.310 (b): "The division of forestry and fire protection shall 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 Haines State Forest Resource Management Area and the Alaska Chilkat Bald Eagle Preserve for the values for which each is established."

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[28] Alaska Stat. § 38.05.945, "Notice," FindLaw, current as of January 1, 2025, https://codes.findlaw.com/ak/title-38-public-land/ak-st-sect-38-05-945/

[29] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, "Public Review of Haines State Forest RMA Draft Management Plan," *Alaska Online Public Notices*, April 9, 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=223387

[30] Alaska Department of Natural Resources, Division of Forestry and Fire Protection, "Notice of Intent-to-Adopt Comment Period: Haines State Forest Resource Management Area Management Plan Amendment," *Alaska Online Public Notices*, October 1, 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=225303

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By presenting the created plan to the advisory committees, with little engagement from the onset of the initial planning phase, the current process usurps DoF's ability to deliver on that statutory requirement. Therefore, the current plan cannot be adopted. The process for creating it has not fulfilled the statutory requirements for its creation.

III. Haines State Forest Resource Management Area Plan Amendment History

A. Establishment and earlier planning

The Haines State Forest Resource Management Area was established by the Alaska Legislature in 1982, under Alaska Statutes 41.15.300–41.15.330 to provide for the multiple-use management of state-owned forest resources. At the same time, the Legislature established the adjacent Alaska Chilkat Bald Eagle Preserve under AS 41.21.610–41.21.630, the purpose of which is to protect Chilkat bald eagles and their essential habitats. "Accordingly, 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 reservation of state public domain land and water for bald eagle preserve purposes and state public domain land and water more appropriate for multiple use".[31]

While their boundaries do not overlap, the management plans of the HSF RMA and the Chilkat Bald Eagle Preserve are required to remain coordinated and collaborative in order to ensure consistent management of shared ecological resources and surrounding watersheds. The Division of Forestry and Fire Protection is required to consult with the Division of Parks, the Department of Fish and Game (including local advisory committees), and the Alaska Chilkat Bald Eagle Preserve Advisory Council. The law does this explicitly to promote the "effective, efficient, and coordinated administration of the Haines State Forest Resource Management Area and the Alaska Chilkat Bald Eagle Preserve for the values for which each is established."[32]

The original HSF RMA plan was established in 1985 with an initial framework for land use decisions. The plan was revised and replaced in 2002 with an update to management policies and implementation procedures, done concurrently with the Chilkat Bald Eagle

[31] Alaska Statutes § 41.21.610, "Purpose of AS 41.21.610–41.21.630," accessed October 28, 2026, https://law.justia.com/codes/alaska/title-41/chapter-21/article-6/section-41-21-610/
[32] Alaska Statutes § 41.15.310(a), "Coordinated Management," accessed October 28, 2026, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-15-310/

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Preserve Management Plan and the Northern Southeast Area Plan to improve consistent resource management.[33]

Public and community input played an important role in shaping the 2002 revision and its management prescriptions. The plan amendment process included input from updated wildlife and fisheries research, a Community Resident Survey, a survey of commercial recreation providers, and municipal input. As a result, the plan was able to include specific recommendations grounded in local priorities. For example, recommendations from the Haines City Council on commercial helicopter operations contributed to the plan's special-use designation regulating commercial helicopter activities. The revision also established a designated non-motorized area around Mount Ripinski and introduced restrictions on certain commercial recreation activities. In addition, the upper Chilkoot River area was classified as Wildlife Habitat Land, prohibiting commercial timber harvesting and material sales while prioritizing salmon spawning grounds, bald eagle feeding areas, and moose and bear habitat. [34]

B. Administrative direction and scope of the amendment

DoF's own account two main drivers of the amendment: legislation requiring state forest management plans to address carbon offset projects, and a separate administrative direction to expand the potential for timber harvest on lands classified for Habitat and Recreation. In its February 2026 scoping materials, the Division explained that, although the amendment's timing was connected to the 2023 carbon-offset legislation, "the Division received additional direction late in 2024 … by updating policy that had previously prohibited timber harvest on Habitat and Recreation classified units."[35]

This specification is important because, while SB 48 (2023), Alaska's Carbon Offset Program, does explain why that management plan requires amendment, it does not explain why DoF is choosing to revisit existing restrictions in Habitat and Recreation units. While this is evidence of the amendment's administrative origin, the carbon legislation is not proof by itself that the agency could not consider alternatives that are less compromising to the ecological integrity of the Forest.

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[33] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "Haines State Forest Resource Management Area Management Plan," accessed October 28, 2026, https://forestry.alaska.gov/management/hainesplan.
[34] Alaska Department of Natural Resources, Division of Mining, Land & Water and Division of Forestry, *Haines State Forest Management Plan* (August 2002), https://dnr.alaska.gov/mlw/planning/mgtplans/hsfp/pdf/hsfpfinal.pdf
[35] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "DFFP Scoping Discussion: Haines Borough—HSF RMAManagement Plan Amendment 2026," January 14, 2026, https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf

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Moreover, the available public record does not identify the specific author, date, or written form of the 2024 direction, nor does it reproduce the underlying directive or state its rationale. SEACC therefore requests that the Division disclose the directive and make public any associated correspondence so that the public can fully understand the administrative direction behind the amendment.

C. Scoping, presentations, and objections

SEACC is concerned that the public engagement and scoping process lacks meaningful targeted engagement. In January 2026, the Upper Lynn Canal Advisory Committee voiced objections that their involvement in the engagement process did not amount to a good-faith consultation by DoF, citing that they were reached out to too late and were not provided with detailed information with which they could provide any meaningful input.[36] On January 14, Division staff met with Haines Borough personnel to discuss the proposed policy changes, including allowing timber harvest on Habitat and Recreation classified lands.At the January 27 Assembly meeting, concerns arose regarding the quality and adequacy of engagement, particularly on whether DoF's consultation with staff can even satisfy the requirement to consult with municipal governing bodies.[37]

Subsequent committee engagement has continued, including in February and March meetings with the Upper Lynn Canal Fish and Game Advisory Committee. However, the existence of these meetings does not establish that participants received adequate information *in advance* or had a meaningful opportunity to influence the amendment's scope. SEACC requests that DoF chronologically document the resumed scoping process and subsequent targeted engagement. For each meeting, we urge documentation of who requested the meeting, who attended and in what capacity, what materials were provided beforehand, which choices remained open, and what recommendations resulted.

D. Public review and intent to adopt

The public-review period for the HSF RMA Draft Management Plan began on April 9, 2026 and accepted submissions through June 5, 2026. Following that period, DoF prepared an

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[36] McChesney, Rashah. "Advisory Committee Wants Better Consultation on New Plan for Haines State Forest." Chilkat Valley News, January 15, 2026. https://www.chilkatvalleynews.com/2026/01/15/advisory-committee-wants-better-consultation-on-new-plan-for-haines-state-forest/.

[37] Brandon Wilks, "Cell Tower Controversy and State Forestry Debate Dominate Marathon Assembly Meeting," *KHNS*, January 29, 2026, https://khns.org/cell-tower-controversy-and-state-forestry-debate-dominate-marathon-assembly-meeting/.

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Issue Response Summary (IRS) documenting public comments, the Division's responses, and recommended revisions to the draft.[38]

The IRS identified several revisions, including adding an adaptive-management framework and definition, a definition of consultation, reorganizing carbon-related policies into a separate section on carbon management leasing and carbon offset projects, and providing additional material on cultural resources and climate-adapted forest management. However, the Division recommends retaining several central policies that drew objections. For example, it rejects a proposed moratorium on timber sales in Unit 1 (Kelsall River) and retains the policy allowing forest management activities on Wildlife and Public Recreation lands.

On October 1, 2026, DoF opened a second comment period through November 2, 2026. The Division states that it intends to adopt the April public-review draft as modified by the recommended revisions in the IRS before submitting the plan to the DNR Commissioner's Office for adoption. However, the intent-to-adopt package consists of the original April draft, the IRS response matrix, and replacement or supplementary materials, rather than a single, fully integrated revised management plan. SEACC urges DoF to provide a consolidated version of the proposed final plan, clearly identifying accepted revisions and retained policies so that the public can meaningfully assess the complete proposal before adoption.

IV. Procedural Concerns

A. Consultation was framed around implementation of a directed outcome

§ 41.15.310 mandates that DoF consults with the Alaska Chilkat Bald Eagle Preserve Advisory Council during the plan amendment process. DoF acknowledges this in their scoping discussion:

> "The scoping period is intended to provide members of the public and interest groups such as this one with an opportunity to weigh in on how the directives received by the Division should be implemented."[39]

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[38] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, *Haines State Forest Resource Management Area Management Plan: Public Review Draft Issue Response Summary*, October 2026, https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=164265.

[39] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, "DFFP Scoping Discussion: Haines Borough—HSF RMAManagement Plan Amendment 2026," January 14, 2026, https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf.forestry.alaska

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DoF also recognizes the magnitude of the proposed changes:

> "We acknowledge that this change in management approach is a big departure from the way the HSF RMA has been managed for decades."[40]

These statements support concern that DoF central policy direction preceded consultation. They acknowledge the breadth of management changes their plan outlines, and yet did not provide any arena for consultation until after it had been drafted. Given the order of these events, the consultation process appears functionally as an opportunity to comment on a predetermined policy direction, rather than as a means to inform the development of the amendment itself in any meaningful way.

Considering this order of events, SEACC raises the question of whether maintaining the existing eligibility restrictions was genuinely available for consideration, or if the directed outcome already foreclosed meaningful consideration of that alternative. If the fundamental policy decisions had already been made before consultation was allowed to shape the outcome, then the scoping process may have circumvented consultation requirements outlined in AK Stat § 41.15.310.

While the January Scoping Discussion did solicit substantive concerns, SEACC is concerned about the scope and decision-making influence of that engagement rather than an absence of discussion itself.[41]

B. Borough-staff engagement was not clearly understood as consultation with the governing body

AK Stat §41.15.320 mandates the DoF consult with "governing bodies of each municipality in the general area" in adopting a forest management plan for the HSF RMA.[5] However, SEACC is concerned that the manner in which this consultation took place is inadequate to ensure the statute's intent. Reporting on the January 27 Assembly meeting, KHNS documented concerns from both borough officials and community members about whether the process constituted genuine consultation with the Borough's elected government:

> "I wanted to make it clear that I did not understand that I was the consultation on behalf of the Haines Borough."
> —Alekka Fullerton, Haines Borough Manager.[42]

[40] Ibid
[41] DFFP Scoping Discussion: Haines Borough, January 14, 2026. https://forestry.alaska.gov/Assets/pdfs/HSFamendment/2026%2001%2014%20-%20HSF RMA%20scoping%20-%20Borough%20Discussion.pdf.
[42] Wilks, "Cell Tower Controversy and State Forestry Debate."

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> "I do not feel that a conversation between DNR and three members of the borough staff is a consultation with our elected government."
> —Mark Sogge, retired ADF&G biologist.[43]

If borough officials were not aware that their interactions with DNR were intended to constitute formal consultation, or did not understand themselves to be representing the Borough in that capacity, it is unclear how those interactions could satisfy the statute's purpose of engaging municipal governing bodies in the planning process. Moreover, SEACC seeks clarification on if government staff have legal authority to represent a governing body for this purpose. Notably, the Haines Borough Assembly voted 4–2 to request direct engagement to fulfill consultation requirements.[44] It is clear that the Assembly does not feel like they were adequately engaged with and seeks to participate directly in the consultation process.

SEACC therefore urges the DoF to clarify how it determined that the statutory consultation requirement had been met. We urge DoF to engage directly with the Assembly and ensure that the Borough's governing body has the opportunity to provide input before the forest management plan is finalized.

C. Advisory committee concerns were raised contemporaneously

Around the same time that the Haines Borough Assembly raised concerns about the quality of its consultation, the Upper Lynn Canal Fish and Game Advisory Committee (ULCAC) expressed similar concerns.

On January 12, ULCAC sent a letter to the state questioning whether DoF had fulfilled its consultation obligations under AS §41.15.310 and AS §41.15.320. The letter outlines the timeline of the HSF RMA Plan amendment and consultation processes, noting that the amendment process began within DoF in early 2024. Despite this, ULCAC was not contacted about the proposed amendment until January 2026, nearly two years later and just weeks before the draft plan was scheduled to be released to the public[45].

In addition to the delayed engagement, ULCAC stated that it had not received sufficient detailed information to provide meaningful input on the proposed amendment. As a

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[43] Ibid
[44] Ibid
[45] Upper Lynn Canal Fish and Game Advisory Committee, "Upper Lynn Canal Fish and Game Advisory Committee to the Division of Forestry on the Haines State Forest Plan Amendment," DocumentCloud, accessed October 28, 2026, https://www.documentcloud.org/documents/26868617-upper-lynn-canal-fish-and-game-advisory-committee-to-the-division-of-forestry-on-the-haines-state-forest-plan-amendment/.

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result, the committee questioned whether DoF had met its obligation to consult with ULCAC in good faith.[46]

To address these concerns, ULCAC requested that DoF provide the information, studies, and reports used to justify the proposed amendment. The committee will review these materials and provide the DNR with additional fish and wildlife studies and local knowledge to help inform management decisions. ULCAC also requested an opportunity to review the revised draft plan before the start of the formal comment period. This would enable more meaningful participation and better fulfill the intent of the HSF's founding legislation, applicable Alaska statutes, and the current Management Plan.[47]

D. Misalignment undermines confidence in public participation

DoF has inappropriately reinterpreted AS 41.15.310(a) to effectively render itself immune to the requirement. Their response in the Issue Response Summary establishes that "DFFP interprets "effective, efficient, and coordinated administration" (AS 41.15.310) to describe the expectations for implementation of management policy within the HSF RMA but does not apply to the development of policy. DFFP consults Fish and Game Advisory councils through the local ADFG habitat biologist during inter-agency review of decision documents and through their presence on the Alaska Chilkat Bald Eagle Preserve Advisory Council."[48] That interpretation explicitly omits the first aspect of the statute, which states "(a)The division of forestry and fire protection shall 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..."[49]

[46] Ibid
[47] Ibid
[48] Alaska Department of Natural Resources, Division of Forestry & Fire Protection, *Haines State Forest Resource Management Area Management Plan: Public Review Draft Issue Response Summary*, October 2026, 9, https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=164265.
[49] Alaska Statutes § 41.15.310(a), "Coordinated Management"

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Haines State Forest Resource Management Area Management Plan
Public Review Draft Issue Response Summary
October 2026

HSF RMA MP Issue Response Summary and Recommended Changes			
General Comments			
Subject	**Issue Summary**	**Response**	**Recommended Change**
Consultation	the State should adopt, within the HSF RMA plan, a standing consultation protocol specifying: 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.	Meetings with the Chilkat Bald Eagle Preserve Advisory Council (CBEP AC) serve this purpose and include representation from all the entities described except DEC. The CBEP AC may choose to invite relevant DEC staff to attend one meeting annually to participate in discussions related to the administration of CBEP and HSFRMA.	No change
Planning Process	Respect the input of local communities and make appropriate changes to the proposed plan.	Concur	No change

Haines State Forest Resource Management Area Management Plan
Public Review Draft Issue Response Summary
October 2026

HSF RMA MP Issue Response Summary and Recommended Changes			
General Comments			
Subject	**Issue Summary**	**Response**	**Recommended Change**
Consultation	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." However, as detailed by the Upper Lynn Canal Fish and Game Advisory Council and reported by the Chilkat Valley News, HSF appears to have treated its obligations as boxes to check rather than legitimate consultation duties.	DFFP interprets "effective, efficient, and coordinated administration" (AS 41.15.310) to describe the expectations for implementation of management policy within the HSFRMA but does not apply to the development of policy. DFFP consults Fish and Game Advisory councils through the local ADFG habitat biologist during inter-agency review of decision documents and through their presence on the Alaska Chilkat Bald Eagle Preserve Advisory Council.	No change

Figure 1. The excerpts from the Haines State Forest Resource Management Area Management Plan Public Review Draft Issue Response Summary October 2026 where the Division explicitly notes "no change" in their recommendations based on the concerns around inadequate consultation.

Consultation is inherently an informing activity, which means it must occur within a timeframe in which such input can be utilized in the formation of policies. Deferring consultation until implementation denies the named advisory bodies a meaningful role in shaping the policies that govern management, undermining confidence that participation can influence the outcome and is antithetical to, as the statute notes, "the values for which each is established".[50] DoF may not simply reinterpret the definition of consultation to include post hoc informing of the bodies meant to inform direction and scope.

[50] Ibid

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E. The amendment changes management intent despite retaining classifications

Although the proposed amendment retains the existing land classifications within the HSF RMA, it may substantively undermine the protections and management priorities intended by those classifications.[51] Under 11 AAC 55.030(f)(1)(A), an amendment includes changes to the uses allowed or prohibited under a management plan. The regulation specifically identifies allowing a previously prohibited use as an example of a change requiring an amendment.

For example, lands classified as Habitat and Recreation contain existing management prescriptions that restrict timber harvesting to prioritize wildlife habitat, recreation, and other non-timber resource values. By expanding potential timber-harvest eligibility within these units, the proposed amendment would change how these lands may be managed, regardless of whether their classification labels remain the same. Retaining the Habitat or Recreation classification does not, by itself, ensure that its operative protection will remain intact.

SEACC is also concerned that the proposed changes may depart from management decisions established through the 2002 planning process, which incorporated extensive community input and resource studies. Accordingly, SEACC requests that DoF provide a comprehensive assessment of the amendment's implications, including a unit-by-unit comparison of existing and proposed management prescriptions and an evaluation of how the revised provisions would affect the purposes and resource values for which each area was designated. DoF should also explain how and why the proposed changes depart from the management decisions established through earlier planning and consultation processes, including the rationale and supporting evidence for revising those decisions.

F. Required management assessments are incomplete or insufficiently demonstrated

DoF has insufficiently demonstrated or has left incomplete many required management assessments. The department should fill in these gaps immediately before proceeding with the plan amendment process:

AS 38.04.065(b)(2) requires an interdisciplinary planning process that considers the physical, economic, and social factors when developing regional land-use plans.[13] This has been partially evidenced in the IRS response matrix, but currently remains inadequate. The response matrix relies repeatedly on later project review, rather than the current,

[51] "11 AAC 55.030 - Land Use Plan." Legal Information Institute. Accessed October 29, 2026. https://www.law.cornell.edu/regulations/alaska/11-AAC-55.030.

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plan-wide proposed eligibility changes. DoF must identify the interdisciplinary analysis of the currently proposed changes.

AS 38.04.065(b)(4)–(6) requires regional land use plans to rely on "the inventory of the state land, its resources, and other values."[15] When relying on these inventories, land use planners are required to consider present and future uses, as well as the resources and uses of the land under other ownership.[15] While inventory references exist, a complete resource-and-use assessment has not been verified. DoF must examine available fish and wildlife information, recreation and traditional-use inventories, watershed conditions, and surrounding-land relationships rather than solely relying on merchantable timber.

11 AAC 55.030(c)(1)–(4), (d) requires that management plans contain the listed area-plan items, along with "goals and objectives for each resource."[18] This requires a complete draft audit; DoF must determine whether newly harvest-eligible areas have resource-specific goals and sufficiently informative assessments, rather than only general forest-wide statements.

11 AAC 55.030(c)(6), (d) Requires "management guidelines and stated management intent" that guide decisions, direct management, and ensure "compatibility among competing land uses."[19] This has been left unresolved, as DoF retained broader eligibility while deferring compatibility decisions to future sale reviews.The department must examine whether the currently proposed plan supplies adequate direction to each individually managed unit. This must be done particularly with regard to Habitat and Recreation units, which contain specific management prescriptions that restrict timber harvesting to prioritize wildlife habitat, recreation, and other non-timber resource values. DoF must examine whether the proposed changes supply adequate direction to retain these management guidelines.

AS 41.15.315(a)–(b) requires that the HSF RMA must be managed "under the principles of multiple use and sustained yield and under AS 41.17."[23] AS 41.17 stipulates "an opportunity for continued traditional use … at levels and by traditional methods and means is guaranteed."[23] This requires a specific assessment; DoF must identify affected places, access, resources, and management safeguards. Merely retaining a list of allowed traditional uses does not sufficiently establish that opportunities at the protected levels and methods remain available under new management prescriptions.

AS 41.17.230(a) requires, for each state forest and each unit, and before adoption of a forest management plan, an operational level forest inventory.[24] DoF must verify the inventory's completion, coverage, methods, and relevance to the areas affected by the amendment.

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DoF must also verify management prescriptions under the principles of multiple use and sustained yield, as stipulated in AS 41.15.315(a)–(b) and AS 38.04.065(b)(1). While DoF invokes these principles, invocation alone does not demonstrate how the revised prescriptions maintain the relevant uses and resources. DoF must examine the underlying analysis and resulting management standards to ensure that the prescriptions are supported by the available evidence and appropriately balance multiple use.

AS 41.17.230(a) establishes that, if permitted uses of a forest management plan are found to be incompatible with the primary purpose of state forests under AS 41.17.200, then "the commissioner shall affirmatively state in the management plan that finding of incompatibility for the specific area where the incompatibility is anticipated to exist and the time period when the incompatibility is anticipated to exist together with the reasons and benefits for each finding."[24] This requirement necessitates closer review; DoF must identify actual incompatibilities and how the plan treats them, rather than providing a blanked statement of compatibility that does not resolve demonstrated conflicts.

AS 38.04.065 requires that the regional land-use plan must establish consistency with applicable municipal land-use plans.[52] DoF must verify this requirement as well as adequate consultation and coordination with the Alaska Chilkat Bald Eagle Preserve Advisory Council, as outlined in AS 41.15.310 (b). DoF must demonstrate that the revised management prescriptions coordinate with the Preserve's statutory purposes and reflect meaningful engagement with the Advisory Council.

A future timber-sale-level analysis cannot substitute for these required assessments at the planning stage. The present question is whether the proposed amendment, on its own terms and based on the available resource information, satisfies the statutory and regulatory requirements governing plan development and establishes adequate management direction before additional lands become eligible for harvest. Deferring these assessments until individual sales are proposed would effectively undermine the purpose of the current legal requirements by shifting substantive planning obligations to a later project-review stage, when the broader decision to expand harvest eligibility has already been made. DoF must therefore resolve these deficiencies in the present amendment process and demonstrate that the revised plan satisfies applicable legal requirements and management assessments before proceeding with the amendment process.

V. Remedy

[52] Alaska Statutes § 38.04.065, "Land Use Planning and Classification," accessed October 28, 2026, https://law.justia.com/codes/alaska/title-38/chapter-04/article-3/section-38-04-065/

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A. Defer adoption and reopen the affected policy choices

SEACC contends that DoF must defer adoption of the amendment until the consultation process is complete and the relevant analysis has been conducted in order for the plan to be valid under the statutory requirements guiding its creation. Adoption should remain suspended until affected stakeholders have had a meaningful opportunity to participate and there has been adequate consideration of the resulting information.

Pending completion of the amendment process, the existing prescriptions should remain in effect. This ensures that any subsequent policy change rests on a procedurally sound and adequately informed decision.

DoF should also make clear that the consultation is genuinely open to reconsideration of the underlying policy choices. The available alternatives must include retaining the existing restrictions, as well as modifying the implementation of expanded eligibility. The process should not be confined to determining how an expansion will be implemented. The substantive question requiring consideration is whether to expand eligibility.

B. Complete documented consultation

SEACC asserts that DoF must complete documented consultation with each body identified in § 41.15.310- § 41.15.320. For each meeting, DoF should confirm the purpose, authority, participants, and decisions open for discussion. Participants should be supplied with usable materials and reasonable deliberation time. After each meeting, DoF should publish the recommendations advised by the consultant as well as written explanations outlining next steps regarding the recommendations.

In addition, DoF must distinguish input from municipal staff to governing-body consultation. Input from advisory committees must also be distinguished from input from agency-staff review.

C. Complete a management-unit comparison and assessment

SEACC requests that DoF publish an existing-versus-proposed prescription crosswalk which clearly identifies proposed changes to management areas. The documents currently available in the intent-to-adopt package do not provide a single, fully integrated revised management plan. Instead, the package consists of a patchwork of documents, including of the original April draft, the IRS response matrix, and various replacement and supplemental materials. As a result, members of the public must piece together multiple documents to determine which provisions have changed, which prescriptions remain in effect, and how the proposed revisions affect individual management units. This approach

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creates an unnecessary barrier to engagement by placing the burden on the public to reconstruct the proposed plan and identify substantive changes. Without a consolidated comparison, it is difficult for the public to understand the full scope of the proposed revisions, evaluate their implications for individual management units, or provide informed and substantive comments.

In addition, DoF should publish a map identifying all newly eligible areas under the proposed forest management plan and clearly identify any affected habitat, recreation, and traditional-use values as well as how decisions are assessed for compatibility among competing uses.[53] For each newly eligible area, DoF should explain how the proposed management changes comply with applicable compatibility standards and remain consistent with the primary purpose of state forests established under AS 41.17.200. This explanation should identify relevant constraints, describe the circumstances under which a proposed treatment must be modified or rejected, and address any required findings of incompatibility where the applicable statutory conditions are met.

D. Evaluate genuine alternatives

SEACC requests that DoF evaluate a meaningful range of alternatives before proceeding with the proposed expansion of timber-harvest eligibility. Rather than treating the expansion as a predetermined outcome, the division should include in the planning process a substantive consideration of whether the existing management approach should be retained or modified. DoF should meaningfully consider that the current approach can allow for adequate resource management and extraction needs without unnecessarily compromising wildlife habitat, recreation, and other non-timber resource values.

Alternatives may include:

- Retain existing harvest-eligibility restrictions.
- Permit narrowly defined restoration or hazard-reduction exceptions.
- Make evidence-supported, unit-specific changes.
- Adopt the broader proposed expansion only if adequately justified.

Consistent with the planning duties outlined in AS 38.04.065, each alternative should be evaluated in light of its anticipated physical, economic, and social consequences, as well as its effects on timber resources, wildlife habitat, recreation, traditional uses, and other relevant resource values.[13] This analysis would allow for a transparent determination of whether the direction of the proposed amendment represents the most appropriate management approach.

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[53] Alaska Administrative Code, tit. 11, § 55.030(c)(6), "Land Use Plan," accessed October 28, 2026, https://www.law.cornell.edu/regulations/alaska/11-AAC-55.030.

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E. Verify remaining procedural prerequisites

DoF should verify the remaining procedural prerequisites before proceeding with the amendment process. DoF should document the appropriate agency review, including with the division of parks, the Department of Fish and Game, including each local fish and game advisory committee with jurisdiction in the area, the Alaska Chilkat Bald Eagle Preserve Advisory Council, as well as the the governing bodies of each municipality in the general area. These are outlined in AS 41.15.310 and AS 41.15.320.

In addition, DoF must establish compliance with AS 41.15.320, which necessitates prior review at public hearings in Haines and Klukwan. DoF must verify that adequate notice has been provided and establish consistency with applicable municipal land use plans, pursuant to AS 38.04.065.

F. Publish an integrated revised draft and reopen review

SEACC requests that DoF publish an integrated revised draft of the HSF RMA Plan Amendment, consisting of a consolidated plan with an existing-versus-proposed prescription crosswalk, which should clearly identify proposed changes to management areas. DoF should also make available all updated maps and land classification orders, along with the information, reports, and studies used to justify reclassification. This will allow the public to reasonably understand the full scope of the proposed revisions and provide informed and substantive comments.

SEACC requests that DoF reopen a review period sufficient for the revised material and allow adequate time for public comment before proceeding with the plan process.

DoF should also publish a consultation record demonstrating adequate, meaningful engagement with all bodies identified in AS 41.15.310-§ 41.15.320 and further reinforced by AS 41.17.230(c). Such a consultation record should include: 1) A change log noting the input and resulting policy adjustments based on input from the advisory committees, borough officials, and the public, as well as 2) a response matrix explaining how substantive recommendations affected the plan. Crucially, this record must establish that consultation occurs prior to plan development components to establish that the input from consultation drives the framework for establishing policy changes. This is an explicit requirement under AS 41.15.310(a) that "The division of forestry and fire protection shall 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

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administration of the Haines State Forest Resource Management Area and the Alaska Chilkat Bald Eagle Preserve for the values for which each is established."[54]

VI. Conclusion

SEACC is committed to durable, evidence supported resource management and functioning public institutions. The question is not whether DoF may revise the Haines State Forest management plan, but whether it has fulfilled the consultation and planning obligations governing a consequential change in management direction. Revising the allocation of forest resources and uses requires an adequate planning record, regardless of whether existing land classifications remain unchanged. Before adoption, DoF must demonstrate that affected governing and advisory bodies had a meaningful opportunity to inform the proposed management direction. Providing notice and conducting presentations does not demonstrate adequate consultation.

DoF must demonstrate that the revised management prescriptions are supported by the assessments and management standards required by law. SEACC therefore contends that DoF must defer the plan amendment process until an adequate demonstration of completed consultation, documented analysis, and renewed public review.

Respectfully submitted,

Tyler Breen
Policy Analyst
Southeast Alaska Conservation Council

Hannah Gilmer
Policy Fellow
Southeast Alaska Conservation Council

[54] Alaska Statutes § 41.15.310(a), "Coordinated Management," accessed October 28, 2026, https://codes.findlaw.com/ak/title-41-public-resources/ak-st-sect-41-15-310/

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Dear Attn: Forest Planning Alaska Division of Forestry & Fire Protection,

I am writing to oppose the proposed Haines State Forest Management Plan Amendment.

The proposed changes would allow logging in areas previously designated for other uses, potentially threatening important wildlife and fish habitat, recreation, and other public use resources.

I am also concerned that the Upper Lynn Canal Fish and Game Advisory Committee and the Chilkat Bald Eagles Preserve Advisory Council were not given the opportunity to robust and meaningful consultation during the planning process. Presenting a plan to these committees is not the same as meaningfully involving them in decision making.

I urge the DNR to reject the amendment in its current form, ensure meaningful and robust consultation with both advisory committees, and prioritize the long-term health of the Haines State Forest.

The Haines State Forest is a valuable public resource that should be managed with careful consideration of its ecological, cultural, and community importance. Decisions that could permanently change how these public lands are managed deserve meaningful public involvement and transparent decision-making.

Thank you for your time and consideration.

Sincerely,
Ms. Sherrie Tinsley-Myers
[redacted]

To: ADNR, Division of Forestry
From: Katharine Palmer, Haines, AK

Comments on the Haines State Forest plan amendment
November 2, 2026

DOF's responses to public comments on the HSF plan amendment are wholly inadequate and fail to address the concerns of individuals and non-profits who are clearly well-informed on old growth forest ecology and the negative impacts of forest management practices that have been outdated for far too long.

Essentially, DOF is ignoring the public's informed concerns rather than bringing Alaska's forestry practices up to management standards related to the current, best available science. DOF continues to operate by cutting what they call "overmature and decadent" trees, ignoring the well documented importance of carbon accumulation by those very trees. Likewise DOF continues to ignore the importance of establishing greater buffers along spawning streams and habitat protection for wildlife.

DOF's response to Carbon Offsets, Carbon Management, and Alternative Land Use Credits are "noted" and "We don't have a program to address this…" The DOF response to Habitat, Restoration, and Forest Resources are simply that DOF doesn't do policy and it is beyond the scope of their responsibility. So much for using the best available scientific knowledge.

Regarding the financial benefits of the plan amendment to the state of Alaska, DOF simply ignores public comments pointing out the absolute need for economic analysis to demonstrate financial benefits to the state. Without such analysis, the plan is meaningless. DOF also fails to understand and integrate Traditional Ecological Knowledge and its essential role in forest management, alleging that DNR has no definition or legal framework to use it. Instead, DOF refers to traditional uses only as berry picking, hunting, fishing, etc.

DOF's plan/amendment has failed to define: ecosystem processes; how the forest can be utilized sustainably, i.e., what timber should be cut and why, what timber should be left intact, and what, where, and how restoration should occur.

No DOF plan should be adopted until DOF is using the best available science and DOF can adequately answer the public's questions and concerns.

Sincerely,
Katharine Palmer

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Please include my comments.
Thanks,
Katharine Palmer

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Thank you for your time and consideration.

Sincerely,
Kayla Shepherd
[redacted]