

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

This is a summary of comments submitted during the Intent to Adopt (ITA) review period for the draft Tanana Valley State Forest Management Plan (TVSF MP). This comment matrix includes summaries of each comment received, DOF responses to each comment, and recommended changes to the plan based on comments received. If comments submitted during the ITA review period were addressed in the [Public Review Draft Issue Response Summary](#), they are not addressed in this document.

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Fish & Wildlife/Habitat	P. 93, line 19 on section 2 (fish and wildlife habitat), add text as follows: “Low elevation areas of both the Kantishna and the Tanana Rivers are important habitat for black bears and moose. Wood bison were reintroduced to Unit 2A of the TVSF near the Minto Flats State Game Refuge in 2024.	Thank you for your comment. Concur.	Revise as recommended.
Fish & Wildlife/Habitat	P. 163, section 2 (fish and wildlife habitat), add text after sentence on Fortymile caribou: “Plains bison were introduced to the Delta Junction area in 1928. Nearby the Delta Junction State Bison Range was established in 1979, with Unit 10C of the TVSF established adjacent on the east in 1983.”	Thank you for your comment. Concur	Revise as recommended
Fish & Wildlife/Habitat	Pg 25, line 7: Please add this key resource at end of this paragraph: Paragi et al. (2020) provides best practices for managing boreal forest habitat for both timber and wildlife resources.	Thank you for your comment. Concur	Revise as recommended

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Fish & Wildlife/Habitat	<p>Pg 25, line 22: Recommend inserting these two paragraphs in order to address other wildlife considerations in habitats other than post-harvest:</p> <p>Other wildlife, such as insect-eating birds and raptors, can help reduce the risks of destabilizing herbivory events, such as damage from irruptive insects and small mammals, while providing viewing opportunities for tourists and residents. Paragi et al. (2020: Table 2) highlighted management suggestions that promote beneficial activity of avian predators. For example, retaining forest patches with late-seral features across harvested areas. This provides predators with snags and cavity trees needed for nesting and hunting in a manner that mimics natural disturbance, such as fire.</p> <p>Finally, voles disperse fungal spores that facilitate seedling establishment, regeneration and tree growth (Paragi et al. 2020). Retaining dispersed woody debris in open harvested areas facilitates vole movement into, and soil inoculation of, areas where conifer regeneration is desired (Paragi et al. 2020: Table 2). In central Alaska, vole herbivory is generally not extreme (Paragi et al. 2016: 122-123).</p>	<p>Thank you for your comment. Concur</p>	Revise as recommended

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Fish & Wildlife/Habitat	Pg 26, line 4: Insert this text after "mortality": Paragi et al. (2016, 2020) recommended wildlife-based management strategies to reduce the risk of insect irruptions when trees are weakened by environmental stressors (e.g., drought, fire, or floods), by maintaining a diverse suite of birds that act as insect predators. Birds can also target key pests, such as woodpecker predation of bark beetles.	Thank you for your comment. Concur.	Revise as recommended.
Fish & Wildlife/Habitat	Add the following as the second to last sentence of this introductory paragraph: "Reforestation on carbon sequestration projects was initially considered early in market scoping (Alden 2001)."	Thank you for your comment. Concur.	Revise as recommended.
Fish & Wildlife/Habitat	Pg 216, Line 5: Add the following as the second to last sentence of this introductory paragraph: "Reforestation on carbon sequestration projects was initially considered early in market scoping (Alden 2001)."	Thank you for your comment. Concur.	Revise as recommended.
Bibliography	New citation: Paragi, T. F., J. C. Hagelin, and S. M. Brainerd. 2016. Wildlife-reforestation interactions and adaptive management. Pages 122–186 [In] M. Freeman and J. Durst, editors. Forest Resources and Practices, Region II-III Reforestation Review, Annotated Bibliography. Department of Natural Resources, Forestry Science and Technical Committee. Document version 30 August 2016. https://www.arlis.org/docs/vol1/D/1078701684.pdf	Thank you for your comment. Concur.	Revise as recommended
Editorial Change	Throughout document, search for capitalized "Native" and revise to "Alaska Native"	Thank you for your comment. Concur.	Revise as recommended.

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Editorial Change	P. 59, line 28: consider adding link or use formal name “Alaska DNR Forestry Resources Viewer” to aid internet searching to find the online interactive GIS tool.	Thank you for your comment. Concur.	Revise as recommended
Editorial Change	<p>P. 270, insert citations (Hanson cited p. 259, line 19 but missing; Alden and Sundquist contingent on adopting inserts for p. 32):</p> <p>Alden, J.N. (tech. ed.). 2001. Reforestation needs and opportunities for carbon sequestration in Alaska. Proceedings of the Alaska Reforestation Council, 24 May 2000 workshop. Miscellaneous publication 2001-2, Agricultural and Forestry Experiment Station, University of Alaska, Fairbanks.</p> <p>Hanson, D. 2013. Timber inventory of state forest lands in the Tanana Valley 2013. Anchorage, AK: Alaska Department of Natural Resources, Division of Forestry. 42 p. [plus appendices]. http://forestry.alaska.gov/timber/forestinventories.</p> <p>Sundquist, S., D. Lutz, A. Foster, P. Fulé, and S. Goetz. 2024. Integrating remotely sensed imagery in a forest gap model to study North American boreal forests in a changing world. Environmental Research Ecology 3:045001.</p>	Thank you for your comment. Concur.	Revise as recommended.
Editorial Change	Preface, Pg I remove erroneous punctuation	Thank you for your comment. Concur.	Revise as recommended
Editorial Change	Pg 4, Line 11 strike "and Restoration Division"	Thank you for your comment. Concur.	Revise as recommended

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Editorial Change	Pg 23, Line 11 strike "American peregrine falcons have been...list."	Thank you for your comment. Concur.	Revise as recommended.
Carbon Management	P. 32, line 14 (carbon management guidelines, section on evaluation): insert sentences with information: "Reforestation on carbon sequestration projects was initially considered early in market scoping (Alden 2001). Recent modeling of forest dynamics under climate scenarios included outcomes of decreasing biomass potentially important to offset evaluations (Sundquist et al. 2024)."	Thank you for your comment. Concur.	Revise as recommended
Carbon Management	Add Management Guideline: Requirements for Carbon Offset Projects. AS 38.95.410 limits the term of a carbon offset project to 55 years; requires that State land used for a carbon offset project, to the extent practicable, remain open to (1) the public for access, hunting, fishing, and other generally allowed uses and (2) other resource development; and requires that State land used for a carbon offset project remain open to mineral exploration and development.	Thank you for your comment. Concur.	Revise as recommended.
Carbon Management	P. 32, line 14 (carbon management guidelines, section on evaluation): insert sentences with information: "Reforestation on carbon sequestration projects was initially considered early in market scoping (Alden 2001). Recent modeling of forest dynamics under climate scenarios included outcomes of decreasing biomass potentially important to offset evaluations (Sundquist et al. 2024)."	Thank you for your comment. Concur	Revise as recommended.

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Enabling Legislation	Pg 1, lines 7-9: document references an outdated line of statute. Recommend revision to match 2024 AS language.	Thank you for your comment. Concur.	Revise as recommended.
Infrastructure Maintenance	Please include high-level maintenance of all trails and logging roads in the state forest.	Thank you for your comment. Please see the Public review draft IRS for responses to comment topics submitted during the initial public review period.	No change.
Infrastructure Maintenance	Page 55/74 regarding Tourism, “prevent erosion” and “resolve conflicts”. We are losing trails due to unmanageable multiple-use conflicts between motorized and non-motorized users. Now a perfect storm of negative impacts is about to occur with the AK DNR, Div.of Lands, poised to increase the weight limit of ORVs, all unlicensed. The many State lands’ trails rendered nigh unusable for human-powered sportspeople by these quagmire generators is unacceptable.	Thank you for your comment. DOF acknowledges your concern over road and trail conditions on State-owned lands.	No change.
Infrastructure Maintenance	Pg. 63/74, Conversion of Trails to Roads based on 5-year schedules, the foregoing comments need to added to the mix between Div. of Forestry and Div. of Mines, Lands and Water.	Thank you for your comment.	No change.

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Infrastructure Maintenance	Pg. 62/74, re Trail Corridors, “protect current use” and “width and siting of corridors depend on use.” How can these principles effectively coexist with “Width of Access Corridors” based on the Eastern Yukon Tanana Area Plans for public access that allow a trail width of 100’ (50’ to either side of centerline). This parameter is disastrous and should be stripped to something relative to a trail, ie 6’ wide. Once again the die is cast too much in favor of heavier, bigger, potentially mechanized usage.	Area plans such as the Eastern Tanana and Yukon Tanana Area Plans provide useful frame of reference for developing management policy on State lands. Lands within Tanana Valley State Forest are specifically managed by the policy stated in the TVSF management plan. In some cases, an entity may propose development of a trail with the added incentive of providing access to timber in the State Forest. Such situations, among others, may justify the design of trails to accommodate heavy machinery.	No change
Infrastructure Maintenance	Pg. 71/74, re Off-Road Vehicle Activity, ORVs are permitted “if they do not kill or break through plant cover and expose soil to erosion.” A chronic and increasing problem in the Interior, not only in the State Forest, is heavier more frequent ORV activity that is making trails impassable for non-motorized users with large sections of mud, water, and logs that multi-braided. There must be more restrictions and funding for enforcement. The means are there, “may be closed temporarily or seasonally”, but they are seldom used to the detriment of the countryside.	Thank you for your comment. DOF notes your concern regarding vegetation damage caused by off-road vehicle activity.	No change

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Management Intent	Pg. 58/74, "State Forest land management will not seek to duplicate opportunities provided by other public lands in the Tanana Valley, such as wilderness or highly developed recreation areas." This policy is unbalanced in favor of developed recreation areas since these complexes can be generated at any time; wilderness once lost is irrecoverable. No more undisturbed lands are being created on our Earth. Shouldn't their preservation be the highest priority?	The primary purpose of State Forests in Alaska is "timber management that provides for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources" (AS 41.17.200). Preservation does not fall within the management intent for lands designated State Forest.	No change.
Recommended Land Additions	The Red Fox Experimental Plantation needs to be included in the Tanana Valley State Forests Expansion Plan.	The parcel containing the experimental forest adjacent to TVSF Unit 13 is included in ETAP unit U-21. Unit U-21 is listed in both ETAP and the Tanana Valley State Forest Management Plan as a recommendation for addition to the TVSF. Amendment of the TVSF management plan is an opportunity to <i>recommend</i> changes to the state forest land base, but the decision to add lands to the State Forest must occur through a legislative designation.	No change

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Recreation	Thank you for your proposed management plan. I see that much consideration is given to the importance of maintaining access to trails for recreational use. I can't emphasize enough how important it is for our mental and physical health to have a variety of welcoming trails all year round. It's not just keeping individuals strong, it is feeding our economy. Just in Fairbanks, we have at least 16 thriving businesses feeding our economy. Just in Fairbanks, we have at least 16 thriving businesses selling nonmotorized outdoor equipment, clothing, and gear. Even more selling motorized trail vehicles! Most of these businesses are locally owned and operated.	Thank you for your comment.	No change

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Scientific Resources	<p>P. 57, lines 9-12 states, “Non-native species will be planted only for research purposes, not for forest management operations that would convert native forests to non-native species.”</p> <p>In that vein, consider inserting on page 216 under “Silvicultural Research” the following research topic prioritized as item (b) in research needs:</p> <p>“Potential advantages and disadvantages of reforestation with non-native, non-invasive tree species after timber harvest or natural mortality events are uncertain. How would naturalized species in Alaska like lodgepole pine or Siberian larch influence carbon sequestration, future timber supply, and fish and wildlife habitat in boreal forest? Prior to adopting forest regeneration at an operational scale that include non-native trees, a Science and Technical Committee and an Implementation Committee could be convened to consider pros and cons to forest health, ecosystem services, the forest industry and provide guidance for implantation and monitoring.”</p>	<p>Thank you for your comment. Concur.</p>	<p>Revise as recommended</p>

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
Sustained Yield Management	<p>I would simply like to reassert two things detailed in my comments on the draft revision from last fall, which I am attaching to this comment.</p> <p>The first is that Forestry has an obligation to manage the resource sustainably and for the maximum public benefit, and that failing to consider tree or stand quality and proximity to market when determining allowable cut fails to live up to these requirements.</p> <p>The second is that in order to manage the forest sustainably, Forestry must do more to plan for both decreasing tree growth associated with climate change and the increasing risk of large-scale disturbance from climate-related wildfire or beetle kill.</p>	Thank you for your comment. Please see the Public review draft IRS for responses to comment topics submitted during the initial public review period.	No change.
General	Land use designations and land classification are not clearly differentiated.	Concur.	Add information clarifying land use designations and land classifications
General	Management of Research Natural Areas should be emphasized as differing from subunits intended for timber harvest.	Concur	<p>Co-designate RNAs as FOR and Reserved Use</p> <p>Clarify management intent in RNAs to represent reserved use</p>
General	Hazardous Sites should be identified in unit summaries	Concur.	Add known hazardous sites to resource summary tables in Chapter 3

Tanana Valley State Forest Management Plan Intent to Adopt Draft
Issue Response Summary
May 2025

ITA DRAFT ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
Subject	Issue Summary	Response	Recommended Change
General	Some unit summary tables have incomplete “other resources and uses” sections	Concur.	Add land records information where needed in unit summary tables
General	Land Classification Order document must be included as a section of the management plan	Concur.	Insert Land Classification Order as Appendix B and re-number subsequent appendices accordingly.