

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

This document provides a summary of the comments submitted during the public review period for the revised Tanana Valley State Forest Management Plan. Similar comments have been consolidated and summarized. The following matrices organize the comments roughly by category and provide DOF responses as well as a summary of changes that will be made to the final draft in response to comments.

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Scale of management	harvests for each strata within each subunit should not exceed the volume deemed "sustainable" in any 10 year period.	TVSFMP provides principles and elements that guide the development of the AAC (see for ex. Pages 46-49). However, the data and methodology used for the calculation of AAC are provided by the technical report, which is not a Decision Document (Page 47, lines 9-11). The most current management tool used for meeting Sustained Yield within TVSF is "Timber Inventory of State Forest Lands in the Tanana Valley" (Hanson, 2013), which uses an AAC methodology. DOF acknowledges that the geographic scale relevant to forest users may vary. DOF is charged to manage the entirety of TVSF on behalf of all users and consistent with the primary Legislative purpose of the State Forest. Forest managers use	No change
Scale of management	Recommend delineation of smaller management units than subunit for management to maintain sustainability within.		No change
Annual Allowable Cut	Recommend calculating AAC on a subunit basis		No change
Scale of Management	Recommend each Management Area (Kantishna, Fairbanks, Delta, Tok) is managed separately for sustainable harvest, rather than combining into volume units		No change
Annual Allowable Cut	Recommend a table-top exercise to determine sustained yield of birch in areas with good road access (e.g. 5A Nenana Ridge and 4C/4D Cache Ck. and Goldstream Ck.), and other areas where new logging roads could accessed with a reasonable haul distance from Fairbanks.		No change
Annual Allowable Cut	Recommend added goal to apply the best science and re-evaluate Annual Allowable Cut (AAC)		No change
Scale of management	consider finer scale [management] resolution in areas where birch fuel wood harvest has and/or is planned to increase significantly.		No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Annual Allowable Cut	Recommend addition to the section describing the scale at which Annual Allowable Cut is calculated (Chapter 2, pp. 50-51). The plan should clarify that AAC is done at the scale of management area, as is described in Hanson (2013:34), rather than at the scale of management units within the management area.	appropriate geographic scales in considering the location of timber sales, which include community and timber market scales.	
Annual Allowable Cut	Provide a more detailed explanation of AAC.	DOF currently evaluates proposed timber harvest volume within a management area setting: Kantishna, Fairbanks, Delta, Tok (Hanson, 2013).	Remove specific references to Hanson, 2013; refer readers to "most current inventory report" published by the division.
Annual Allowable Cut	The Plan should state AAC is calculated for each of the four management areas, and quote the specific methodology	Framing harvest volumes within the management area setting is appropriate to meet the timber	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Annual Allowable Cut	The Plan should reference pg. 34, Hanson 2013, Timber Inventory of State Forest Lands in the Tanana Valley	<p>needs within distinct communities and timber markets while providing for sustained yield of timber resources on this scale in perpetuity.</p> <p>Nonetheless, in the future land managers and forest users may find a different geographic frame to be more appropriate for providing sustained yield of forest resources. The scope of the TVSFMP is to provide principles and elements for use in meeting the Sustained Yield principle within the TVSF land base.</p> <p>DOF will continue to use the best quality methods and data to improve timber management within the scope of its funding and mission.</p>	Reference to specific inventory reports in the TVSF management plan will be replaced with “most recent and accurate available inventory data”

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Annual Allowable Cut	Plan should recognize an emerging issue generating concern from the public: increasing birch fuelwood harvest. Some factual trend information should be included to acknowledge the trend: During four prior years 1,178 acres and 2,028,800 ft ³ birch fuel wood was harvested in Unit 5A, Nenana Ridge. And in future years 2,628 acres and 4,454,400 ft ³ are planned to be cut in Units 4C and 4D, south of Murphy Dome (most recent FYSTS for the Fairbanks area	DOF Areas report harvest data quarterly and annually. This information can be obtained for any time period. In addition, summaries of harvest activity and DOF analysis of harvest trends are publicly available in the DOF's annual report.	No change
Scale of Management	Recommend addition of explanation regarding which management unit annual allowable cut is calculated for and is used as the basis for sustained yield timber management decisions.	Annual allowable cut calculations and development are described in inventory reports that are published independently from the management plan.	Refer readers to most recent AAC determination documents, allow flexibility for management plan language to capture future updates to inventory or AAC calculations.
Reduction Factors	On Page 47, Line 36 a discussion ensues about utilizing reduction factors. Rationale is given here about why this is good thing and results in a conservative sustained yield estimate. On Page 48, Line 36 the discussion is about reducing the need for reduction factors. This seems like a contradiction. Reduction factors were utilized in the 2013 inventory report and with the size of the TVSF there are still many unknowns concerning harvest area feasibility.	Appropriate and technically sound reduction factors are an element that may be considered for a calculation of AAC.	Remove descriptions of technical development of AAC from TVSF management plan. Readers will be referred to the most recent AAC technical report available.

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Silviculture	Page 49, Line 36 priorities for timber sales are given to maintenance of a range of forest types and stand ages that support diverse forest uses. Existing verbiage is somewhat backwards. Sales are located in such a manner as to provide reasonable access, logging terrain, quality of timber, marketability and the reduction of adverse effects to the resource and public.	DOF gives highest priority in locating and designating timber sales to comply with the primary Legislative purpose of the State Forest. A range of age classes and forest types result from active management of the forest for timber production.	No change
Silviculture	Consider adding language to the section on Silviculture and Harvest Practices (Chapter 2, page 55) committing to management practices that recognize the value of natural and old-growth stands and require harvest and regeneration practices that support natural ecosystem functioning.	DOF gives highest priority in locating and designating timber sales to comply with the primary Legislative purpose of the State Forest. A range of age classes and forest types result from active management of the forest for timber production.	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Silviculture	encourage management of the TVSF in a way that recognizes the value of the existing natural and old-growth forest resource. Recognizing this value can be done in the timing and layout of sales, the contractually required harvesting techniques, the treatment of timber residues, site preparation, regeneration techniques, and possibly thinning or other treatments. Areas with particularly special qualities could be managed in special ways, even if it meant requiring less economically efficient harvest techniques.	<p>DOF gives highest priority in locating and designating timber sales to comply with the primary Legislative purpose of the State Forest. A range of age classes and forest types result from active management of the forest for timber production.</p> <p>Research Natural Areas are designated within the TVSFMP to “Maintain ecologically representative or unique sites in a natural state for observational research, education, and environmental monitoring” (page 36, lines 19-20). These areas will be retained in a natural state, consistent with MP intent.</p>	No change

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Forest Inventory	encourage DOF to continue periodic re-measurement of permanent inventory plots throughout the forested lands of interior Alaska.	Timber Inventory of State Forest Lands in the Tanana Valley (Hanson, 2013) is the most current management tool used for meeting Sustained Yield within TVSF, and uses an AAC methodology. This is a valuable reference for land managers. DOF will continue to use the best quality methods and data to improve timber management within the scope of its funding and mission.	No change
Forest Inventory	Recommend regular review and re-calculation of inventory and annual allowable cut	DOF will continue to use the best quality methods and data to improve timber management within the scope of its funding and mission.	No change
Forest inventory	Recommend addition in Chapter 2, pg 51, Forest inventory: "The forest inventory will be updated as needed, and at least every 10 years, to account for changes to the timber base from administrative decisions, economic factors, environmental factors, or accessibility."		No change
Forest inventory/AAC calculation	Recommend addition to pg 53, "Procedures for Modification of Allowable Cut:" "The AC will be reviewed at least every five years to ensure that it reflects the current scientific understanding of forest health, yield, and mortality. The Division of Forestry will produce a written report outlining relevant data. Any modifications to the AC will follow the processes outlined above."	Technical reports, such as AAC calculations or forest inventories, will be generated or updated as needed to meet the Sustained Yield principle within the TVSF landbase.	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Reduction factors	Chapter 2, page 51, under "Reduction Factors," such as: "A reduction factor will be applied to account for changes in forest yield or additional risk of disturbance projected to occur as a result of climate warming."	Reductions factors are "... a reduction to the allowable cut for unknown, on-the-ground situations where timber harvest may not be feasible or appropriate." (page 47, lines 2-4).	No change
Reduction Factors	incorporate risk of large-scale disturbance and projections related to yield into the AC determination as a way of managing conservatively in a time of rapid change.	Changes in growth and yield of the forest land base will be reflected in updated inventories, rather than reduction factors as described. Appropriate and technically sound reduction factors are an element that may be considered for a calculation of AAC. Adaptive management is a central philosophy of this management plan and provides flexibility to meet unforeseen challenges (see for example pages 27-28, and Page 50, lines 24-26).	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Value-added Timber Products	encourages the Department of Natural Resources (DNR), Division of Forestry (DoF) to consider sales and prioritization that support regional value-added products as stated in the draft document	DOF gives highest priority in locating and designating timber sales that comply with the primary Legislative purpose of the State Forest. A management intent for TVSF is to bring the entire land base under active management (page 49, lines 27-28). TVSFMP encourages harvest opportunities in support of value-added businesses (see page 45, line 25, and page 50, line 11).	No change
Silviculture	Manage the resource according to quality and accessibility	TVSFMP affirms the importance of access and stand quality for timber sale planning (see for example pages 50-51).	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Silviculture	language could be added to Chapter 2, page 50, under "Annual Allowable Cut," such as: "The annual allowable cut will be determined separately for each marketable tree species/vegetation type class with marketable tree species."	<p>Future technical reports including AAC will be structured around managing for a sustained yield of forest products using the best information available.</p> <p>The most recent Tanana Valley Inventory (Hanson, 2013) delineates forest stands by stratum, where each stratum represents a category of timber type present within the Interior Alaska boreal forest. The Inventory calculates an annual acreage per year that each stratum contributes to the AAC by geographic area. Making harvest decisions within an AAC computed on the basis of all strata with the potential to grow into the saw- or poletimber size class is a comprehensive way to account for forest growth and yield over time.</p>	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Silviculture	language could be added to Chapter 2, page 53, under "Availability of Timber for Harvest," such as: "Timber resources will be made available in such a way that future forest users will have comparable access to that enjoyed by current users."	DOF gives highest priority in locating and designating timber sales that comply with the primary Legislative purpose of the State Forest. A management intent for TVSF is to bring the entire land base under active management (page 49, lines 27-28). Compatible management actions <i>may increase the access</i> of future generations compared to that enjoyed by current users.	No change
Long-Term Timber management	Use conservative and adaptive management. A reasonable approach to managing in a time of rapid change, documented decline, and anticipated disturbance would be to exercise caution and manage as conservatively as possible, such as by erring on the side of caution and using approaches that would prove reasonable under a wide range of future scenarios.	DOF will continue to use the best quality methods and data to improve timber management within the scope of its funding and mission. Adaptive management is a central philosophy of this management plan and provides flexibility to meet unforeseen challenges (see for example pages 27-28, and Page 50, lines 24-26).	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Economic Objectives	Consider adding language to the section on Economic Objectives (Chapter 2, page 53) stating that it is in the state’s best interest to harness the full economic value of its forest resources, including by setting minimum prices on forest resources with high natural value, use value, or other special qualities, or by requiring that suitable stands be used for highest and best use, for instance lumber rather than fuelwood	Statutory authority granted to DOF to manage TVSF highlights the commercial value of forest land. However, DOF does not presume the authority to prioritize specific timber products or types of business over others. As in any free market system, the value of the resource is set by the price market participants are willing to pay.	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Long-term Timber Management	Consider leaving some areas, including areas close to town, out of timber rotation. This would clearly meet one of the overarching objectives named in the 2020 Alaska Forest Action Plan, to “enhance public benefits from trees and forests” (page 2). There is also an argument to be made that leaving some areas out of rotation is a necessary part of sustainably managing the forest, for the role these natural areas could play in supporting regeneration and supporting and continuing known and unknown ecosystem functions and services, and non-timber resources specific to old or natural forests.	<p>DOF gives highest priority in locating and designating timber sales that comply with the primary Legislative purpose of the State Forest. A management intent for TVSF is to bring the entire land base under active management (page 49, lines 27-28).</p> <p>Excluding from harvest areas with existing access or near to communities may disadvantage forest users who may enjoy “...coincident benefits such as increased road access, recreation access, hazardous fuels management, or habitat management” (Page 50, lines 16-17).</p>	No change
Long-term Timber Management	By the same logic that Forestry is willing to offer a harvest at an economic loss in order to achieve public goals, including biological diversity it should be willing to not offer a harvest, at no cost to the state.	The no harvest option is an implication of this management principle, and this option is pursued on a vast majority of TVSF land base at any given time.	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Silviculture	The discussion on reforestation methods was of interest particularly on birch reforestation. For both spruce and birch, perhaps wording should be changed to “is preferred” instead of “is required” for mineral soil occurrence and seed source.	Thank you for your comment	Change as described
Slash Management and Wood Salvage	encourage the DF&FP to consider contract conditions to increase salvage of firewood from feller buncher harvests	Slash management and timber product utilization standards are addressed within Forest Land Use Plans (FLUP) and timber sale contracts. Foresters regularly inspect sales for compliance with the FLUP, contract, and applicable statutes and regulations. Foresters may include specific language in the FLUP and/or contract that address potential	No change
Slash Management and Wood Salvage	Re: increasing birch fuelwood harvest. DOF should implement the recommendations of Paragi et al. (2020), and reaffirm them in the 2024 Plan revision.		No change
Slash Management and Wood Salvage	this pg. 57, line 16 might be amended to include the following underlined text “Sprouting is unreliable for trees over 70 years or through dense debris piles remaining after certain harvest methods.”		No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Slash Management and Wood Salvage	urge DOF to make increased effort to raise public awareness of this significant additional fuel wood harvest opportunity after the commercial operator has completed harvesting and hauling	<p>challenges and mitigations to achieving successful reforestation</p> <p>FLUPs specify silvicultural system, which include the anticipated method of regenerating a stand. FLUPs account for the silvics of the species, the ecology of the forest type, the site's productivity and the management objectives. Foresters conduct post-harvest regeneration surveys to meet statutory reforestation standards (see for example 11 AAC 95.375-390).</p>	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Wildlife impacts of timber harvest	Harvesting a large proportion of the mature birch and/or white spruce-birch forest type could create localized impacts to a few bird species tied to those habitats. I offer the following additional scientific information indicating the importance of smaller cut areas and leaving some snag/cavity nest trees, and uncut islands for wildlife habitat and better regeneration. According to ADFG, Sharp-shinned Hawk and Goshawk prefer mature spruce or birch and/or mature birch forest for nesting	<p>TVSFMP states “The wildlife management objective of the TVSF is "the production of wildlife for a high level of sustained yield for human use through habitat improvement techniques to the extent consistent with the primary purpose of a state forest" (AS 41.17.400(e))” (Page 1, lines 20-22). Pages 18-23 further elaborate on management intent regarding wildlife habitat.</p> <p>DOF implements Forest Land Use Plans (FLUPs) for timber harvest in compliance with applicable statutes and regulations, and cooperates with ADF&G on wildlife habitat review. DOF follows best practices for managing the boreal forest for timber and wildlife (see for example Paragi et al., 2020) in timber sale layout.</p>	No change

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

TIMBER MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Roads and Infrastructure	Recommend adding language about infrastructure (roads etc) built as part of the timber sale program and typically funded by credits in the timber appraisal process. This is an important asset that is not a direct revenue but is an important aspect of the timber sale program. It might be worth calling this section "State Revenues and Infrastructure Assets"	Increased infrastructure is identified as a coincident benefit of timber sales in the TVSF in chapter 2, Section L, Under the heading "Economic Goals"	No change
Editorial change	Hot link the cited "consultants report" on AAC	The TVSF management plan is meant to cover management goals and guidance for a period of up to 20 years. Additional publications that might aid in management decision-making may supersede the information available at present before subsequent plan revisions.	Remove citations to specific articles, refer readers to the most recent and accurate technical reports available.
Editorial change	Hot link this report, Tanana Valley Allowable Cut Determination.		
Editorial Change	References to specific publications such as Hanson 2013 Tanana Valley Forest Inventory report are too specific and binding for the temporal scale of a Forest Management Plan. Revise to allow MP document to accommodate the publication of new information.	Concur	Remove statement describing specific development of AAC. Insert "the AAC calculation is not a decision document. Adjustments are made as changes in land ownership or designated uses occur." Remove references by title to specific report documents, refer readers to most recent and accurate publications available.
Editorial change	Pg 48, line 47: Add a space between "of" and "sustained"	Thank you for your comment. DOF concurs.	Change as described

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

FOREST HEALTH TOPICS			
Subject	Issue Summary	Response	Recommended Change
Content reorganization to match document	Recommend reorganizing the Forest Health, Climate Change, and Carbon Offset sections to include Goals, Management Guidelines, and an Activity Summary for consistency with the rest of the document. Adding subheadings used in other sections would help clarify objectives and articulate management principles.	Concur with recommendation to make editorial changes to increase consistency.	Added subheadings and reorganized content

CLIMATE CHANGE TOPICS			
Subject	Issue Summary	Response	Recommended Change
Understanding & addressing climate change	Recommend incorporating a proactive approach to studying and addressing climate change impacts in the forest management plan.	Updated forest management plan allows flexibility to adapt management approach as new information becomes available. Encouraging multiple age classes, harvesting with forest health in mind, and ensuring regeneration are all methods of increasing forest resilience.	No change

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

Understanding & addressing climate change	Encourage mitigation strategies that are effective, economically feasible, and tailored to Interior Alaska’s forests and markets. Some measures may have little to no cost, while others provide economic benefits or may add expenses. A reasonable approach is to include climate mitigation as a management goal and explore locally suitable solutions.	The updated forest management plan allows flexibility to adapt as new information emerges. Encouraging multiple age classes, harvesting with consideration for forest health, and ensuring successful regeneration of appropriate tree species are key strategies for maintaining resilient and sustainable forests.	No change
Understanding & addressing climate change	Recommend using the best available science to assess climate change impacts on forest growth in TVSF. Recent modeling studies by Dr. David Lutz could help determine if past forest growth assumptions remain valid in a changing climate. (NASA ABOVE project https://cce.nasa.gov/files/te2019_ab_presentations/TE2019_Poster_Lutz_60_83.pdf).	The updated forest management plan cannot capture every relevant piece of research and must have an effective knowledge cutoff time at which point new research materials will not be referenced. Dr. Lutz’s study is relevant and reference to this study can be included in this management plan.	Concur; reference will be added.
Understanding & addressing climate change	Recommend reorganizing the Forest Health, Climate Change, and Carbon Offset sections to include Goals, Management Guidelines, and an Activity Summary for consistency with the rest of the document. Adding subheadings used in other sections would help clarify objectives and articulate management principles.	Concur with recommendation to make editorial changes to increase consistency.	Added subheadings.

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

NON-FORESTRY LAND USE TOPICS			
Subject	Issue Summary	Response	Recommended Change
Subsurface Resources	Pg 44, Line 24-25: Listing permits and leases appears to create an exclusive list of allowable authorizations; recommend replace "of the permit or lease" with "or stipulations"	Thank you for your comment. Concur.	Change as recommended
Subsurface Resources	Pg 45, Line 4: most current Material Sites along the forest road system are directly adjacent to road and are essentially a wide spot; recommend remove reference to screening	Thank you for your comment. Concur.	Remove sentence beginning Pg 45. Line 4 "Material sites...Significant human use."
Subsurface Resources	Pg 135, Line 23: this unit [shall] remain open to mineral location and leasing	Thank you for your comment. Concur	Insert shall as described.
Land Use Adjudication	Pg 149, Line 7: Replace "authorize and record the route on the status plats" with "adjudicate"	Thank you for your comment. Concur.	Revise as recommended
Land Use Adjudication	Pg 149, Line 19-20: Suggest removal. MLUP's are issued/adjudicated by the Mining Section, typically only within Mining Claims. Suggest we not have the plan dictate authorization type or section responsible for adjudication.	Thank you for your comment. Concur.	Revise as recommended.
Grazing and Agriculture	Pg 33, line 18: Clarify that GAU grazing is allowed on TVSF	Thank you for your comment. Concur.	Add generally Allowed Use description of grazing to list of grazing criteria for TVSF

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

NON-FORESTRY LAND USE TOPICS			
Subject	Issue Summary	Response	Recommended Change
Grazing and Agriculture	Pg 34, Line 14: Lease/Permit stipulations control land use activities, not Grazing Management Plans	Thank you for your comment. Concur.	remove reference to Grazing management Plan, replace with "in writing by the department"
Grazing and Agriculture	Pg 35, Line 5: grzing management plans are submitted to DMLW Regional offices and reviewed by Department of Agriculture.	Thank you for your comment. Concur.	Clarify GMP must be submitted to DMLW Northern Region Office.

FISH, GAME, & HABITAT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Support of Fish and Wildlife Management	The inclusion of research and comments from Fish and Game personnel have greatly improved numerous subsections of the Forestwide Management Policies chapter.	Thank you for your comment.	No change
Support of Fish and Wildlife Management	I am in strong support, and applaud, guidelines that specify fish and wildlife habitat consultations with ADFG, as noted on page 23 lines 8 and 9: "stand-scale consultations during development of the FLUP" and "landscape-scale consultations...during development of the FYSTS."	Thank you for your comment.	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

FISH, GAME, & HABITAT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Support of Fish and Wildlife Management	I appreciate prominent reference to the ADFG recommendations for “Maintaining wildlife habitat in the boreal forest of Alaska—a guide for land owners, developers, and timber harvesters” (Paragi, et al. 2020 https://www.adfg.alaska.gov/static/lands/habitatrestoration/pdfs/managing_boreal_forest_timber_wildlife_tanana_valley_wtb.pdf).	Thank you for your comment.	No change
Support of Fish and Wildlife management	appreciate and support the prominent recognition of riparian and special management zones to protect aquatic habitats (pg. 18, lines 19-34).	Thank you for your comment.	No change
Recommend Added Management Guideline	I recommend DOF consider adding this as an overall guideline applicable to all Units because it will make those units more wildlife-friendly. “DOF will plan the sinuosity of cut shapes to increase edge effect to benefit wildlife as well as reduce impacts to viewsheds, to the extent feasible.”	The TVSF MP is meant to provide managing foresters flexibility in the face of evolving environmental, economic, and social factors for a management period of up to 20 years. Descriptions of specific design characteristics for individual timber sales is not appropriate for	No change

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

FISH, GAME, & HABITAT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Recommend Added Management Guideline	<p>recommend the 2024 Plan carry forward a 2001 guideline that helps formalize practices such as retaining multiple “un-cut habitat islands” to mimic unburned patches and enhance natural reseeded and retention of snags or cavity trees (as indicated in the Reforestation Standards, 2016 final consensus points, Technical Committee report pg. 36: https://forestry.alaska.gov/Assets/pdfs/forestpractices/IG%20Chart%20of%20%20recommendations%20-%20May%2026%202016%20am.pdf).</p>	<p>the scope of this document. DOF cannot guarantee that the goals described in these comments will apply to every timber sale designed in the management period of this revision.</p> <p>TVSF MP policy emphasizes the importance of agency and public participation in the review of FYSTS and FLUP documents to advocate for specific considerations in scoping spatial options for harvest (FYSTS) or developing harvest and reforestation methods (FLUP).</p>	
Consistency	<p>Page 13, line 29. Consider also adding Common Loons because they are equally sensitive to disturbance as Trumpeter Swan. (see: https://www.sciencebase.gov/catalog/item/5771b896e4b07657d1a6c8bc)</p>	<p>Thank you for your comment. Noted.</p>	<p>Edit as recommended</p>

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

FISH, GAME, & HABITAT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Consistency	Page 13, line 30. I suggest the temporal range be changed: June-September. Rearing of swan broods in July and August is also a sensitive time and disturbance can result in separation of young from the adults with ensuing increase in mortality.	Thank you for your comment. Noted	Edit as recommended
Consistency	Page 15, line 17. While no longer officially endangered, there is a new issue. Peregrines have undergone a significant decline recently, probably due to avian influenza (per recent surveys along the upper Yukon River in Alaska (Skip Ambrose, unpublished data, and NPS Yukon Charley National Preserve, unpublished data). They should continue to get special attention.	Thank you for your comment, DOF notes this concern.	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

FISH, GAME, & HABITAT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Invasive Species	Page 22, line 17. I strongly suggest the new Plan call out the most troublesome and aggressive invasive species in the TVSF area: The terrestrial White-sweet clover (<i>Melilotus alba</i>) and Bird vetch (<i>Viccia cracca</i>), and aquatic: (<i>Elodea canadensis</i>). All three species are aggressive invaders and are capable of negatively altering fish and wildlife habitat. DOF should add as a goal within the next five years to develop an invasive species early detection rapid response plan for TVSF timber harvest operations.	Thank you for your comment. The TVSF management plan is written to allow managing foresters the flexibility to adapt forestry practices to evolving environmental, economic, or social conditions for a management period of up to 20 years. The guidance provided in this revision directs readers to resources describing current invasive species concerns and recommended mitigation practices that will be updated consistently throughout the management period of this plan.	No change.

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

FISH, GAME, & HABITAT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Fish Habitat	<p>Management Unit 14, Tok River page 148,</p> <p>2. Fish and Wildlife Habitat: “The Tok River provides spawning and rearing habitat for coho salmon,” please add, the coho salmon in the Tok River was introduced as an experiment by Students of the Tok High School. The coho salmon are not native to the Tok River. There is no available research to show that the salmon have returned since they were introduced by Tok School students.</p>	<p>Thank you for your comment. Alaska Department of Fish and Game oversees the development of the State of Alaska Anadromous Waters Catalogue. Water bodies listed in this catalogue are protected under AS 16.05.871. The Tok river is also protected by the FRPA riparian standards for type III-B water bodies in AS 41.17.118(3)(B)</p>	<p>Revise Unit 14 summary to describe Tok River as listed in ADFG Anadromous Waters Catalogue.</p>
Large Game Habitat	<p>“improved moose habitat that resulted from the 1990 Tok River Fire,” The 1990 Tok River fire did not come close to Management Unit 14 Tok River. This needs to be cleaned up.</p>	<p>Thank you for your comment. Confirmed. Fire perimeters from nearby burn in 1990 do not overlap with Unit 14.</p>	<p>Specify 1990 fire occurred nearby, but not within Unit 14.</p>
Editorial Change	<p>Pg 151, Line 8-9: suggest using “Examples of” rather than “Among the”</p>	<p>Thank you for your comment. Concur</p>	<p>Revise as recommended.</p>

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

ACCESS TOPICS			
Subject	Issue Summary	Response	Recommended Change
Forest Roads	Support of increased road development to meet market demand.	Thank you for your comment. DOF notes this support.	No change.
Forest Roads	Recommend adding language in the Revision that addresses ways to reduce the costs of roads for operators and maintain roads built by operators after sales are complete.	Thank you for your comment. Current management guidelines in the TVSF MP, Chapter 2, Section R Transportation. Minimizing transportation costs is listed as a goal. Detail describing the strategies for individual sales or sale areas is discussed in decision documents such as BIFs and FLUPS.	No change
Forest Roads	encourages DoF to consider how coordination with other landowner agencies may be practical for road easements and construction by operators.	Thank you for your comment. DOF has a practice in place for applying for easements along all-season primary routes, in coordination with DMLW. The majority of road construction occurs through timber operators or contracting.	No change
Forest Roads	Page 66, Line 18-20 - I suggest adding a sentence here to recognize that in the winter, many of the roads are groomed and maintained on a voluntary basis by people living near and recreating on state forest land.	Thank you for your comment. DOF acknowledges the local contributions to road and trail maintenance in and dear State Forest lands. This document is meant to define DOF management policy for TVSF. Plan language must not imply the requirement or expectation of voluntary management of activities by members of the public.	No change

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

ACCESS TOPICS			
Subject	Issue Summary	Response	Recommended Change
Forest Roads	On Page 115, Line 9 there maybe should be some mention of Banner Creek winter access route into unit 7B. There are existing OTC winter sales in this area.	Thank you for your comment. Noted.	Winter access to unit 7B from the Richardson Hwy via RS2477 trail will be identified.
Forest Roads	Pg 120, Lines 12-13: Once Pogo closes, the existing road will be stranded unless DNR secures access through the private property. Currently authorize via time-limited exclusive use easement to Pogo. Forestry activities could be excluded by landowner. If access is secured across private property, then the road up to Giles Creek becomes public once Pogo closes.	At the time of publication, Pogo Mine Road is the most likely access for forest management activities in unit 8. If or when timber harvest is pursued in that area, DOF will perform the appropriate research to confirm this option for access and plan accordingly.	Add language specifying time-limited exclusive use easement
Forest Roads	Pg 121, Lines 16-20: Use of this road is time limited unless long term access is secured.		
Forest Roads	Pg 118, Lines 1-4 Recommend replace "will" with "Should." There may be reasons other than funding that might require deviation from this statement.	Thank you for your comment. Concur.	Change as described
Public Access	"Pipeline Access Roads and Crossings" Vehicle weight should be curb weight, not Gross vehicle weight	Thank you for your comment. Concur.	Revised to curb weight

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

ACCESS TOPICS			
Subject	Issue Summary	Response	Recommended Change
Public Access	Pg 71, lines 14-15: Sentence is grammatically confusing	Thank you for your comment. Concur.	Change to "the Tanana Valley State Forest is managed to provide public access through road, RS2477 trails, winter access, and navigable waters."
Public Access	Pg 71, Line 16 remove "Complete"	Thank you for your comment. Concur.	Change as described.
Public Access	Inconsistent RST numbers listed with trail names.	Presence of trails on SF land may change over time, for example with identification of new RS 2477 trails. Guidelines should be re-written to apply to current and future conditions.	Remove specific list of trail names, clarify management guidance for accommodating trails on the management land base.
Public Access	Pg 85, Lines 27-28 DOT may be "backing away" from extension of Totchaket Rd toward Kantishna River	Thank you for your comment. Noted.	Re-write to emphasize value and stipulations of roads in Unit 2, remove reference to specific project. Re-write to emphasize value and stipulations of roads in Unit 2, remove reference to specific project.
Public Access	Pg 87, Line 14: replace reference to 1995 historic trails atlas with AS 19.30.400	Thank you for your comment. Noted	Revise as recommended
Public Access	Pg 95, Lines 30-34: Easement issued in July. ADL 419281.	Thank you for your comment. Noted.	Update language to reflect presence of ADL 419281 in Unit 4

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

ACCESS TOPICS			
Subject	Issue Summary	Response	Recommended Change
Public Access	Pg 97, Lines 12-17: FNSB trails plans do not control actions on State land. Authorizations for trails, whether authorized by DMLW or DOF, are subject to a public process. Unless the Lincoln Creek Loop Trail has an easement on it, this plan should not speak to whether a trail will be authorized or constructed. At best, it should say “should be considered”.	Thank you for your comment. Concur.	Revise as recommended
Public Access	Pg 109, Lines 7-9: re-write to If efforts to maintain the current alignment of the Chena Hot Springs Winter Trail (RST 278) are unsuccessful, consideration should be given to relocation to the southern portion of this unit	Thank you for your comment. Concur.	Revise as recommended
Public Access	Pg 109, Line 8-9: current statement re: relocation of trail is inaccurate. DNR would decide whether to vacate based on 51.065 criteria, which requires equal or better/reasonably comparable.		Revise language to remove implication of DOF authority to vacate trail easements beyond criteria listed in 11 AAC 51.065.

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

ACCESS TOPICS			
Subject	Issue Summary	Response	Recommended Change
Public Access	Pg 115, Lines 18-19: ...11 miles of the existing Redmond Creek Trail [may] be upgraded... This requires an interest finding be either the Region (easement) if long term or through FLUP if short term.	Thank you for your comment. Concur.	Change as described
Public Access	Unit 10, 11, Section 8, Transportation and access: believe there is legal access from the west via RST's and/or 17(b)'s. RST's. RST's are not limited by 17(b) limitations because they precede the 17(b)'s. Access is not contested	Thank you for your comment, Concur.	Remove "contested" language from access description.
Public Access	Unit 14, Section 8, Transportation and Access: Include language that indicates that a "17b easement was later applied atop a portion of the RST"	Thank you for your comment. Noted	Change as described.
FRPA	Management Guidelines and Activities, Tok River Page 149, 1. Streamside Management: Per the Alaska Forest Resources & Practices Act: AS 41.17 the Tok River is Type III-B Water Body. Along a Type III-B harvesting may occur up to 50' of high water mark.	Presence of trails on SF land may change over time, for example with identification of new RS 2477 trails. Guidelines should be adjusted to apply to current and future conditions.	Remove specific lists of trail names, clarify management guidance for accommodating trails on the management land base.

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

SCIENTIFIC RESOURCES TOPICS			
Subject	Issue Summary	Response	Recommended Change
Research Natural Areas	<p>Oblique (Tschute) Lake should not be stocked by ADFG. Is it being maintained in its “natural state” if stocked per the current plan update language? From the 2001 TVSF update- "It will also specifically address the Oblique Lake Research Natural Area in terms of ADF&G’s stocking Oblique (Tschute) Lake with rainbow trout. DNR will work with the TVSF Citizens' Advisory Committee, ADF&G, local communities, and other interests when planning for Unit 2." It appears this was done and this lake is no longer stocked, correct? There was confusion with the names of the lakes with Dune Lake which is still in the most recent ADF&G stocking plan. They are still stocking Dune Lake, which I assume in not the lake in the RNA. It would be good to provide some wording in the updated plan discussing how and if this situation was resolved.</p>	<p>The TVSF management plan is meant to guide managing foresters in the management of forest resources and other compatible uses within the state forest. A decision to stock a body of water or not is made by Alaska Department of Fish & Game. Concerns regarding the management of fish and game should be directed to ADF&G.</p>	<p>Remove description of fish stocking from RNA summary.</p>
Future Research	<p>recommend as relatively high priority the addition or amendment of a research need at the end of Chapter 4 to assess short-term regeneration on sites harvested with feller-bunchers.</p>	<p>Thank you for your comment. Concur</p>	<p>Regeneration on sites harvested with feller-bunchers will be added to Chapter 4, Research Needs</p>

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

SCIENTIFIC RESOURCES TOPICS			
Subject	Issue Summary	Response	Recommended Change
Chapter 3, Unit 14 Summary	5. Scientific Research: “None identified in this Unit.” I think there is a lot of sample and growth & yield plots in this Unit. During Governor Cowper Jobs Bill Program a forest thinning project was done and needs to be identified in this Management Plan.	State and Federal forest inventory plots have been measured within TVSF Unit 14. These projects are designed to monitor changes over time, including potential personal use or forest management activities. The research uses in this unit do not limit potential forest management activities.	Revise Unit 14 “Scientific Research” to acknowledge inventory activity in the area, but specify research activity in Unit 14 does not limit forest management activities.
Editorial	Pg 38, Line 3: Specify DNR-authorized research	Concur	Edit to read “DNR-authorized”
Experimental Forests	The Forest Growth Study Area that is located on Red Fox Drive in Tok, Alaska is not mentioned anywhere in the plan. It is owned by the State of Alaska DNR Division of Forestry. Furthermore, I recommend that the experimental forest located on Red Fox Drive in Tok be renamed for the UAF Professor that was instrumental in the conception and life of the experimental forest; Dr. Edmond Packee Sr.	The experimental forest in Tok is located adjacent to, but outside the boundary of the TVSF. Language in this plan applies only to lands within the Tanana valley State Forest. Records of the location and ownership conveyance available in LAS record OSL 1445 .	No change.
Experimental Forests	In Chapter 2, Scientific Resources: Reference (hot link) the 2005 legislation, same on line 13 when discussing 2055 transfer to the University.	Thank you for your comment. Concur.	Link statute citations throughout plan.

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

PRIVATE LAND AND AESTHETICS TOPICS			
Subject	Issue Summary	Response	Recommended Change
Private land	Pg 36, Line 15: remove "state-initiated"	Thank you for your comment. Concur.	Revise as described.
Private Land	Pg 36: Add Guideline: Alaska Native Allotments	Thank you for your comment. Concur.	Parcels within TVSF identified as Alaska Native Allotments, but not yet adjudicated by DMLW NRO will be managed as if they are private lands. As adjudication is completed, the ownership status of these lands will be updated to indicate conveyance or retention of ownership, and management activities will reflect the updated ownership status.
Scenic Buffers	In favor of the logging buffer given around private parcels.	Thank you for your comment	No change
Scenic Buffers	See: Chapter 3 page 104 line 11,12,13 Proposed addition: "Scenic Quality: Timber, road, mining, and other development activities in this unit will be sited and designed to enhance views or minimize adverse impacts on scenic views from the Parks Highway [and Tanana River] to the extent feasible and prudent."	Thank you for your comment. DOF acknowledges the Tanana River's importance as a corridor for travel, subsistence, recreation, and tourism uses.	Revise as recommended

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

PRIVATE LAND AND AESTHETICS TOPICS			
Subject	Issue Summary	Response	Recommended Change
Scenic Buffers	Chapter 3 page 106 table 3.5 under Summary of Management Intent Proposed addition: "Scenery on Parks Hwy (and Tanana River), timber production, wildlife habitat, recreation near Tanana River.	Thank you for your comment. DOF acknowledges the Tanana River's importance as a corridor for travel, subsistence, recreation, and tourism uses.	Revise as recommended
Scenic Buffers	See: Chapter 3 page 102 line 5,6 Proposed addition: "minimizing impacts to scenic values along the Parks Hwy (and Tanana River) where feasible and prudent." Justification: The Tanana River is utilized by the public for recreation and subsistence activities and its scenic value should be retained. This revision may also encourage larger buffers along the river to preserve nesting habitat for Bald Eagles and other non-game species protected under state and federal law.	Thank you for your comment. DOF acknowledges the Tanana River's importance as a corridor for travel, subsistence, recreation, and tourism uses.	Revise as recommended

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

PRIVATE LAND AND AESTHETICS TOPICS			
Subject	Issue Summary	Response	Recommended Change
Private Land	See: Chapter 3 page 102 line 23 Proposed change: "Private Land and Leaseholds: None identified in this unit." (This statement is inaccurate) Change to: There are numerous private parcels in unit 5a. Justification: There are many native allotments and at least one non-allotment private parcel within unit 5a.	Thank you for your comment. Concur.	Identify private inholdings in unit summary for Unit 5A and all TVSF units.
Private Land	See: Chapter 2 page 40 line 12 Proposed change: "The DOF will consider using selective harvest or other partial cutting techniques within 200 feet (change to 500 feet) of private land and consider potential impacts of roads on adjacent private land when planning forest road locations." Justification: 200 feet is not enough distance to reduce the impact on private land owners and shield them from the negative impacts of logging activity including noise and decreased scenic and property value.	DOF has determined 200 ft to be an appropriate considered buffer size to accommodate private land ownership on a forest-wide policy scale. Not every instance of timber harvest adjacent to privately owned lands will require the level of accommodation recommended. The public review of Best Interest Findings and Forest Land Use Plans provide opportunities for recommendations regarding the layout or implementation of specific timber sales or sale areas.	No change

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

CARBON MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Project verification	The plan should explain how Forestry will ensure any offset projects have a real climate benefit, are ecologically responsible, and are not unduly restrictive.	Carbon registries require carbon offset projects to demonstrate that emissions reductions or removals are real, measurable, and permanent. 11 AAC 78.060(b) requires the Department "manage a carbon offset project on state land in a manner consistent with a registry's standards, protocols, and methodologies." Additionality, leakage, and permanence standards (including reversals) are set by carbon registries and these criteria for each project are evaluated by both a carbon registry and an independent validation and verification body. Setting these standards in regulation could run counter to registry standards and impact the Department's ability to register projects.	Specify that carbon offset projects within TVSF will be developed according to the criteria listed in AS 38.95.400 and 11 AAC 78.060
Editorial Change	Page 30 Carbon Offset Projects, suggest hot linking all statute and regulation cites.	Thank you for your comment. Concur.	Change as described
Additional Goal or Guideline	suggest language be added to the section on carbon offsets to state goals, articulate requirements and administrative process, and explain interaction with other management objectives	Thank you for your comment. Concur, management Goals and Guidelines should be developed and added to the Carbon Offset Projects section of the TVSF Management Plan	Developed statements of Management goals and guidelines and inserted them into chapter 2, Section F.

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

CARBON MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Additional Goal or Guideline	Recommend added goal: <u>Economic Development</u> While some forest management practices can help mitigate climate impacts without significant added cost, a carbon offset program offers the opportunity to use outside financial resources to support actions in Alaska that will help address climate change but might not be currently economic. Offset projects have the potential to bring revenue to the state while at the same time supporting local jobs	DOF acknowledges and will address the need for management goals and guidelines in the TVSF management plan regarding carbon offset projects on State Forest land. DOF will develop management goals and guidelines to the extent possible with current information.	Developed statements of Management goals and guidelines and inserted them into chapter 2, Section F.
Additional Goal or Guideline	Recommend added Goal: <u>Climate mitigation</u> The primary goal of carbon offset projects is to support the natural climate mitigation potential of forests as a tool for minimizing the impact of climate change. Together with other management actions taken by Forestry, offset projects have the potential to use Alaska's vast natural resources to help address this global challenge	11 AAC 78.060 requires DNR to manage a carbon offset project on state land in a manner consistent with a registry's standards, protocols, and methodologies, which include consideration of other land uses such as timber harvest.	Developed statements of Management goals and guidelines and inserted them into chapter 2, Section F.

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

CARBON MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Additional Goal or Guideline	Recommend added Guideline: <u>Managing for Multiple Use</u> While the development of carbon offset projects follows statutes and regulations specific to the carbon offset program, AS 41.17.230(g) requires offset projects to be consistent with forest management plans, including this one. The primary purpose of state forests is “timber management that provides for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources.” Any offset project must be consistent with the underlying goal of providing a sustainable timber resource and meeting ecosystem health, wildlife, and other management goals.		Developed statements of Management goals and guidelines and inserted them into chapter 2, Section F.
Additional Goal or Guideline	Recommended management Guideline: <u>Administration</u> Because carbon offset projects will have a long-term impact on management of those parcels, projects will undergo a thorough review process both within the Department of Natural Resources and by the public. While offset projects will be permitted through a process specific to that program, the Division of Forestry will also include notice of any potential offset project in its Five Year Schedule of Timber Sales or by other means to ensure the opportunity for forest users and the public to comment on the proposed project.	Projects will be subject to public review and comment during DNR’s best interest finding process and during the carbon registry’s registration process. DOF may include Carbon Offset projects in FYSTS publications, but there is no requirement in statute or regulation to do so	Developed statements of Management goals and guidelines and inserted them into chapter 2, Section F.
Public Process	Section F in Chapter 2 of the plan needs additional detail on the scope, rationale, and public review process for carbon sequestration projects. I recommend the DF&FP finalize the updated plan but consider amending the carbon project portion of the plan within the next 2-3 years as more details about potential carbon projects become transparent.	Thank you for your comment. Concur	Goals and guidelines for carbon offset projects in TVSF will be developed to the extent possible with current information.

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

CARBON MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Project Implementation	recommend the Plan provide a hypothetical scenario of how a carbon offset project may be evaluated and implemented on TVSF. The Plan should describe how DOF would evaluate a carbon project and how it could address economic impacts to the existing and anticipated timber harvesting opportunities in TVSF. The DOF could make projections of the approximate value of timber to be offered in the Five-Year Schedule of Timber Sales, based on recent history and anticipated trends.	The purpose of the Carbon management section in the TVSF MP is to acknowledge the enabling legislature for the SOA Carbon Offset Program and acknowledge carbon offset projects as a potential use within TVSF. Specific descriptions of the design and evaluation of a project will be addressed through public process, including review of a preliminary Best Interest Finding (BIF) before a project is approved on State Forest lands	No change
Valuing Potential Projects	A carbon project evaluation should also consider the economic multiplier effect to the local economy from timber-related jobs (e.g. payroll, transport, equipment, milling, use in local construction, etc.).	As a part of the planning process for any carbon offset project, DNR is required by statute to consider “reasonably foreseeable effects that a project may have on the state or local economy...” (AS 38.95.410(a)(5)) as well as “the effect of the project on the state’s timber industry” (AS 38.95.410(a)(6))	Reference AS 38.95.410(a) and 11 AAC 78.030 in management guidelines describing DOF’s role in the planning process for future carbon offset projects.
Valuing Potential Projects	when estimating future timber productivity in TVSF for a carbon project I strongly urge DOF to consider recent forest growth and climate change modeling studies (e.g. Lutz, Dartmouth/NASA https://cce.nasa.gov/files/te2019_ab_presentations/TE2019_Poster_Lutz_60_83.pdf).	Thank you for your comment. DOF will include the cited resource in consideration of forest productivity for future projects.	No change

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

CARBON MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Interactions with Timber Harvest	Tanana Valley State Forest Citizen Advisory Committee made a motion to have the Carbon Credit include certain language to ensure future Timber Sales would not be impacted in the Tanana Valley State Forest. I would like to recommend that the motion that was passed and the letter that was written by the TVSFCAC be included in the 2024 Tanana Valley State Forest Management Plan.	<p>The TVSF Management Plan is intended to document the DOF’s management policy for resources within TVSF.</p> <p>According to its By-Laws, The purpose statement of the TVSF CAC includes “2. to inquire into matters of community interest relating to the Forest and to bring these matters to the attention of the public”; and</p> <p>3. “To make recommendations to the Director and forest managers of the DOF concerning, among other things.... b. TVSF management Plans amendments and updates; c. TVSF policies and management guidelines....”</p> <p>DOF acknowledges the recommendations that were shared by the TVSF CAC. The TVSF CAC may, per committee By-Laws, bring these matters to the attention of the public, but the recommendations of the CAC do not necessarily represent the management policy of the Division, so will not be included in the management plan.</p>	No change.

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

CARBON MANAGEMENT TOPICS			
Subject	Issue Summary	Response	Recommended Change
Interactions with Timber Harvest	Recommend addition of language about mitigating possible effects on the current logging industry	11 AAC 70.030 describes the evaluation criteria for a potential carbon offset project on state-owned lands, including “whether the potential carbon offset project would be incompatible with existing use of the land by a state agency” (11 AAC 78.030 (c) (2)) and “whether the potential carbon offset project would impede public access, resource development, or other uses under AS 38.95.410 ” (11 AAC 78.030(c)(7))	No change

RECREATION TOPICS			
Subject	Issue Summary	Response	Recommended Change
Trails Connecting Nenana and Fairbanks	Comments in support of trail spurs connecting Forestry Roads in Unit 5	Thank you for your comment. DOF notes the public support of this concept.	No change

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

RECREATION TOPICS			
Subject	Issue Summary	Response	Recommended Change
Trails Connecting Nenana and Fairbanks	Recommend requiring planners to contact people living and working in the vicinity of Unit 5 in development phases of future recreational facilities	The TVSF management plan is not meant to authorize any specific project or development. Development of any potential large scale recreation facility on TVSF will occur through a separate adjudication process, which will include public opportunities for review and comment. Recommendations for specific project attributes can be made during the scoping and public review phases of the project application.	No change
Trails Connecting Nenana and Fairbanks	Comments in support of letter submitted by Alaska Trails	Thank you for your comment. DOF notes the public support of this letter.	No change
Trails Connecting Nenana and Fairbanks	Encourage DNR to promote construction of trails to connect Forestry roads between Fairbanks and Nenana.	DOF's management goals for recreation on TVSF include creating opportunities for access to State owned lands for recreational use through forest management activities. DOF is not funded or staffed to directly endorse or develop recreational facilities. When projects are proposed via DNR adjudication within TVSF, DOF will review projects and approve, deny, or provide stipulations for approval.	No Change
Development and/or maintenance of trails	Recommend DOF allocate funding to develop or maintain a recreational trail system within TVSF.		

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

RECREATION TOPICS			
Subject	Issue Summary	Response	Recommended Change
Consolidated surface access use	Recommend deferring winter plowing of Forestry roads until spring to accommodate recreational use	The primary purpose of TVSF is timber management providing for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of the public land and resources. Recreation is an allowed through multiple use management, but DOF does not prioritize recreational use above the primary purpose of the state forest.	No change
Recreational Use in Subunit 5B (Bonanza Creek Experimental Forest)	Recommend the following language in Chapter 3, Unit 5, <i>Management Guidelines and activities</i> : “While the primary use of these roads will continue to be for timber management, forestry’s consideration of opening timber sales will take safety concerns of all users into account, and upgrades will give priority to safety improvements that benefit both recreationalists and logging traffic. Identification and mitigation of safety risks inherent in overlapping usage will be made with feedback from all user groups, within the stated priority framework.”	<p>Consultation of user groups as described in this recommended change is inherent in DOF’s planning and decision process. Opportunity for the public to provide feedback on access routes for specific timber sales is provided through the public review of draft Forest Land Use Plans (FLUPs).</p> <p>Public engagement in the review of decision documents (Best Interest Findings and Forest Land Use Plans) is critical for the identification and mitigation of risks described in the recommended text.</p>	Change as described

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

RECREATION TOPICS			
Subject	Issue Summary	Response	Recommended Change
Timber harvest near recreational trails	Opposition to harvest activity in areas of TVSF adjacent to public recreation trails.	Where feasible and prudent, the DOF makes efforts not to block trails on account of harvest activity. For example, where a trail enters and exits a sale polygon. Buffers may be maintained around trail corridors for trails of regional or statewide significance where required. Forestry roads are developed and maintained in support of the primary purpose for the state forest, which is timber management.	Review unit summaries in Chapter 3 and clarify management intent of each unit to reflect the State Forest's primary purpose and relationship of other, incidental uses.
Recreation in ecologically sensitive areas	Recommend adding language to specifically address recreation use in landscape areas sensitive to damage.	Most recreation activity in TVSF occurs as generally allowed use. Limitations for generally allowed uses on state land are described in 11 AAC 96.020. Current management guidance allows trail use restrictions to limit types of trail traffic based on trail conditions or by season.	No change
Management of Historic Trails	Recommend preservation and protection of historic trails within TVSF	The TVSF management plan includes goals and guidelines for forest management in areas adjacent to existing trails in the state forest, including RS 2477 trails and trails of regional and statewide significance.	No change

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

RECREATION TOPICS			
Subject	Issue Summary	Response	Recommended Change
Public use cabins	Support of the construction of one or more recreational cabin in Subunit 5A.	Thank you for your comment. DOF notes the public support of public recreation cabins in subunit 5A. DOF is not funded to facilitate construction of public use cabins, nor is such a project within the primary purpose of the TVSF.	No Change
Public use cabins	Recommend removal of public use cabins from land use summary matrices in Chapter 3. Likely originally included in reference to repealed statute 38.05.079	Concur	Reference to public use cabins in Chapter 3 unit summaries will be removed.
Public use Cabins	Pg 86, “recreational facilities:” Recommend removal of reference to construction of public use cabins by SOA agencies	Concur. DOF is not funded to facilitate construction of public use cabins, nor is such a project within the primary purpose of the TVSF.	Reference to SOA-funded construction of recreational facilities will be removed
Recreation Access	Support of improved public access to trails within TVSF	Thank you for your comment. Chapter 2, Section Q, Public Access describes access to publicly owned land and resources, including recreational use as a management goal within TVSF.	No change
Public Access	Recommend DOF publish geo-referenced pdf maps for TVSF unit boundaries to assist forest users.	Concur. DOF will consider creation and distribution of such a product. However, geo-referenced maps will be a separate project from the revision of this management plan.	No change
Public Access	DOF should provide for and clearly mark TVSF legal access and provide public parking for the TVSF users.	Concur. The DOF notes public interest in increased signage indicating land ownership and improved parking opportunities.	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

RECREATION TOPICS			
Subject	Issue Summary	Response	Recommended Change
Future recreation developments	Pg 64, Lines 4-6: Recommend revision to include that if recreation funding increases, construction of recreational facilities may become more feasible.	Construction and/or maintenance of recreational facilities does not fall within the responsibilities of the DOF (AS 41.17.030). Other entities may propose development of recreation facilities within TVSF through a DNR land adjudication application. Due to the responsibilities of the DOF and the primary purpose of TVSF (AS 41.17.200), funding development of recreational facilities is outside the purview of the Division of Forestry & Fire Protection.	Clarify language to emphasize DOF goals to create opportunity and access for recreational use through active forest management.
Future recreation Developments	Outdoor recreation should be considered an economic factor when valuing the use of TVSF	Chapter 2 Sections N. Tourism and O. Recreation describe economic goals for recreation and Tourism use in the TVSF.	No Change
Trails	Support of expansion of winter and summer trail systems within TVSF.	Thank you for your comment. Establishing or maintaining trails for recreational use is outside the management purview of DOF. The Division notes public interest in recreational trails within the TVSF and will consider this comment in the authorization process for future proposed projects of this nature.	No change.

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

RECREATION TOPICS			
Subject	Issue Summary	Response	Recommended Change
Trails	Recommend addition of potential access to recreational trails from Cripple Creek neighborhood to Table 4.2	Reference to this project can be added to table 4.2 to reflect public interest.	Add additional trailhead to Table 4.2; Clarify table description to emphasize that Table 4.2 identifies projects in which the public has expressed interest, and that DOF is not funded or staffed to implement or develop these recommendations beyond review and adjudication of applications for such projects.
Trails	Advocate for recreational trail development in TVSF Units 8, 9, 10	DOF's management goals for recreation on TVSF include creating opportunities for access to State owned lands for recreational use through forest management activities. DOF is not funded or staffed to directly endorse or develop recreational facilities. When projects are proposed via DNR adjudication processes, DOF will review projects and approve, deny, or provide stipulations for approval.	No change
Editorial change	Pg 61, Line 4: recommend changing "residents" to "residents and visitors" to capture non-resident tourism uses	Thank you for your comment, noted.	Change "residents" to "users"
Editorial change	Pg 139, Line 30: DPOR indicates Eagle Trail State Recreation Site is a 35-site campground, not 60.	Confirmed	Site number edited to 35

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

RECREATION TOPICS			
Subject	Issue Summary	Response	Recommended Change
Community Collaboration	Recommend adding language to emphasize the value of private-public partnerships for funding recreation and trail development.	Thank you for your comment. As DOF is organized to manage forest resources to allow other uses in the State Forest, development of recreational facilities is almost certain to be limited to external organizations and associated funding.	Clarify management guidelines in Chapter 2, Section O. Recreation to emphasize the potential role of outside organizations in the planning and proposal of recreation facilities within TVSF.
Boat use	Ch. 3, Unit 14, Recreation and Tourism Summary: Recommend remove statement “The Tok River is used for boating and fishing, mainly by paddlers, since it is to shallow for power boats.”	Thank you for your comment, concur.	Revise Recreation & Tourism summary in Unit 14 to reflect motorized and non-motorized boat use on the Tok River.
Alaska Long Trail	Recommend addition of Alaska Long Trail to Table 4.2	Language in the TVSF MP is focused specifically on the management of land within the state forest boundary. The Alaska Long Trail extends beyond the management purview of this plan. DOF acknowledges the intended trail developments discussed in the Alaska Trails comment letter that intersect the TVSF land base.	Trail segments connecting logging roads in Unit 5 will be added to Table 4.2. Clarify table description to emphasize that Table 4.2 identifies projects in which the public has expressed interest, and that DOF is not funded or staffed to implement or develop these recommendations beyond review and adjudication of applications for such projects.

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

RECREATION TOPICS			
Subject	Issue Summary	Response	Recommended Change
Alaska Long Trail	Support of Alaska Long Trail project	Thank you for your comment. Establishing or maintaining trails for recreational use is outside the management purview of DOF. The Division notes public interest in the Alaska Long Trail project and will consider this comment in the authorization process for future proposed projects of this nature.	No change
Alaska Long Trail	Recommend addition of proposed route of Alaska Long Trail to Chapter 2, Section O. Recreation.	Thank you for your comment. The information in Chapter 2 is meant to provide general guidance to foresters and aid in decision-making when faced with specific project proposals. Discussion of a specific project proposal is not an appropriate addition to Chapter 2.	No change
Alaska Long Trail	Recommend addition of proposed Alaska Long Trail segment in Chapter 3, Unit 5	DOF acknowledges Alaska Trails' intentions to propose trail segments within Unit 5. Because the discussed trail segments are not an existing resource, they will not be identified in the land use summary for Unit 5 in this revision.	Trail segments connecting logging roads in Unit 5 will be added to Table 4.2, a summary of development projects in which the public and outside entities have expressed interest in pursuing.
Alaska Long Trail	Opposition to Alaska Long Trail; recommend less infrastructure.	Thank you for your comment. The Division notes your opposition to the Alaska Long Trail project and will consider this comment in the authorization process for future proposed projects of this nature.	No change

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

AMENDMENT PROCESS & EDITORIAL TOPICS			
Subject	Issue Summary	Response	Recommended Change
Editorial Change	Inconsistent page numbers between table of contents and other sections of the document	Thank you for your comment. Concur	Re-number pages for consistency
Editorial Change	Recommend addition of specific information about parcels recommended for addition to TVSF in Chapter 4.	Thank you for your comment. Concur	Add list of parcels recommended for addition to Chapter 4, "Recommendations for Additions and Withdrawal"
Management Goals	Support of TVSF MP goals that balance protection of terrestrial and aquatic habitats and preservation of cultural resources with sustainable resource development and timber harvest.	Thank you for your comment.	No change
Editorial Change	Formatting Issues, Multiple Pages. In Chapter 2 many page headers are labeled "Transportation" or are incorrectly labeled.	Thank you for your comment. Concur.	Re-label page headings for consistency
Editorial Change	Erroneous capitalization in table of contents	Thank you for your comment. Concur.	Adjust capitalizations
Consistency	Chapter 1, "Purpose of State Forest," line 32: "by the commissioner or"	Thank you for your comment. Concur	Add "or" to the end of line 32
Consistency	"Relationship to other management plans:" Specify YTAP published in 2014, ETAP published in 2015, remove reference to TBAP	Thank you for your comment. Concur.	Remove reference to TBAP, confirm publication dates of ETAP and YTAP
Editorial Change	Inconsistent use of "shall" and "will"	Thank you for your comment. Concur.	Review document for consistency
Consistency	Pg 22, line 33: Easements do not undergo an .035(e) process but are also not a "permit".	Thank you for your comment. Concur	Remove "either through the original AS 38.05.035(e) process or a permit review process"

Tanana Valley State Forest Management Plan Public Review Draft
Issue Response Summary
March 2025

AMENDMENT PROCESS & EDITORIAL TOPICS			
Subject	Issue Summary	Response	Recommended Change
Editorial	Pg 22, Line 33: Best interest is most often associated with a 2 step Best Interest Finding Process outlined in .035. Permits and Easements are not subject to a BIF process. Removal of “best” reduces confusion but does not detract from the statement.	Thank you for your comment. Concur.	Remove “best”
Consistency	Pg 84, Line 27: Tolovana Roadhouse, not Lodge	Thank you for your comment, Concur.	Change as described
Consistency	Pg 98, Unit 4B: Suggest “Removed”. LDA’s such as TVSF are withdrawals; seems more appropriate to remove or release a withdrawal than to withdraw a withdrawal	Thank you for your comment. Concur.	Change as described
Editorial	Chapter 3: Page numbers out of sequence. Unit 10 should start on page 132	Thank you for your comment. Concur.	Re-number pages
Consistency	Pg 150, Lines 17-18: Why would this trigger a plan amendment rather than simply embarking on an LLO/MCO process?	Closing a previously open site to Mineral Entry is listed in Regulation as an example of change requiring an amendment (11 AAC 55.030)	No change
Consistency	Recommend updating glossary (guideline and policy) entries that cite TBAP	Thank you for your comment. Concur.	Update references to reflect current area plans
Public process and communication	Community Collaboration: Engage with local user groups, advocates, and volunteers to align the plan with community needs.	Thank you for your comment. DOF provides opportunities for interested parties, members of the public, and local, state, tribal, and federal governments to participate in the planning process through scoping periods and agency and public review.	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

AMENDMENT PROCESS & EDITORIAL TOPICS			
Subject	Issue Summary	Response	Recommended Change
Public Process and communication	An addition we would like to see is a newsletter (perhaps quarterly, or seasonally)available to keep the public updated on forest concerns available digitally or in print to any one who requests it.	Thank you for your comment. DOF will consider this request. Information about forest activities in Alaska is published in the DOF annual report and Five Year Schedule of Timber Sales.	No change
Purpose and Scope	The CAC encourages the plan development team to maintain a structure and tone throughout the plan revision that focuses on the primary purpose of the TVSF (i.e. timber and wildlife management) as stated in Chapter I: Introduction, Purpose ofthe Tanana Valley State Forest.	Thank you for your comment. Concur.	No change

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

AMENDMENT PROCESS & EDITORIAL TOPICS			
Subject	Issue Summary	Response	Recommended Change
Purpose and Scope	<p>The Tanana Valley State Forest Citizen Advisory Committee made a motion and voted to support the expansion of the Tanana Valley State Forest at the April 2024 meeting in Fairbanks, Alaska. Joe Young from Tok approached the board for support to expand the Tanana Valley State Forest in the Upper Tanana Region, there were specific areas on the map that were identified. The TVSFCAC unanimously passed a resolution of support to expand the Tanana Valley State Forest. This should be included in the 2024 Tanana Valley State Forest Management Plan.</p>	<p>Thank you for your comment. The TVSF Management Plan is intended to document the DOF’s management policy for resources within TVSF.</p> <p>According to its By-Laws, The purpose statement of the TVSF CAC includes “2. to inquire into matters of community interest relating to the Forest and to bring these matters to the attention of the public”; and</p> <p>3. “To make recommendations to the Director and forest managers of the DOF concerning, among other things.... b. TVSF management Plans amendments and updates; c. TVSF policies and management guidelines....”</p> <p>DOF acknowledges the recommendations that were shared by the TVSF CAC. The TVSF CAC may, per committee By-Laws, bring these matters to the attention of the public, but the recommendations of the CAC do not necessarily represent the management policy of the Division, so will not be included in the management plan.</p>	<p>Chapter 4, proposed Additions to the State Forest has been updated.</p>

Tanana Valley State Forest Management Plan Public Review Draft
 Issue Response Summary
 March 2025

AMENDMENT PROCESS & EDITORIAL TOPICS			
Subject	Issue Summary	Response	Recommended Change
Public Process and Communication	On Page 86, Line 23 Timber development cooperation in Unit 2 should also mention Toghottthele Corp in addition to Doyon.	Thank you for your comment. Rather than add specific or comprehensive lists, the language in this plan will be reworked to allow as much flexibility as possible to accommodate a range of circumstances.	Revise to “Alaska Native Corporations”