

Haines State Forest Resource Management Area Management Plan

Public Review Draft Issue Response Summary

October 2026

This is a summary of comments submitted during the Public Review period for the draft Haines State Forest Resource Management Area Management Plan (HSF RMA MP) between April 9, 2026 and June 5, 2026. This comment matrix includes summaries of each comment received, DFFP responses to each comment, and, if applicable, recommended changes to the plan draft based on comments received.

HSF RMA MP ISSUE RESPONSE SUMMARY AND RECOMMENDED CHANGES			
GENERAL COMMENTS			
Subject	Issue Summary	Response	Recommended Change
Adaptive Management	The HSF RMA Management Plan should include information about adaptive management	Concur	Add language to plan defining adaptive management framework and describing forest management implications on state lands.
Adaptive Management	CIV recommends adoption of the definition applied in the Tanana Valley Forest Plan (2025): “Adaptive management: A natural resource management framework that emphasizes simultaneously managing and learning about natural resources. Learning in adaptive management is accomplished through monitoring and awareness in the practice of management itself, with adjustments to strategy as more information is gathered. Often, this framework is presented as a cyclical process, with distinct phases of identifying stakeholders, goals, management alternatives, and monitoring practices; followed by implementation, monitoring, and assessment. The insights developed during monitoring and assessment of a practice are then used to refine or adjust the planning stages in future decision-making (Williams, 2011).”	Concur	Add recommended definition to HSF RMA management plan glossary
Alternative Land Use Credits	A better approach might be for the state to get out of the timber business altogether except for small local sales, and pursue credits for biodiversity which is now occurring in some areas. The state could be a leader in this new approach for offsets by developing a conservation strategy for the HSF similar to that used by the Tongass National Forest a few miles to our south.	The State of Alaska does not currently have a program or statutes and regulations to administer biodiversity credits or other alternative land use credits. The policy in the HSF RMA MP is intended to guide implementation of existing resource management and land use programs in a way that is compatible with the primary purposes described in AS 41.15.300.	No change

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Subject	Issue Summary	Response	Recommended Change
Carbon Offsets and Carbon Management	To pursue carbon offset projects, HSF must start over with a plan that does not violate the tenets of valid carbon credits and instead produces meaningful environmental benefits	The plan policy related to Carbon Management is not intended to design specific carbon management projects. The plan policy identifies carbon management projects as a potential use within the HSFRMA, provided projects are compatible with the statutory purpose of the HSFRMA. Individual projects will be released for public and agency review, including a Best Interest Finding.	No change
Carbon Offsets and Carbon Management	the carbon offset projects DNR is proposing for the HSF could do little to reduce net emissions, while potentially increasing damage to the forest (ironically increasing emissions.)	The plan policy related to Carbon Management is not intended to design specific carbon management projects. The plan policy identifies carbon management projects as a potential use within the HSFRMA, provided projects are compatible with the statutory purpose of the HSFRMA.	No change
Carbon Offsets and Carbon Management	the draft plan simply states that “[a]ll land use designations in the [HSF] are identified as available for carbon offset projects.” This vague directive is not supported by any evidence about the viability, feasibility, or benefit of carbon offset projects in any specific area of the forest. There is also no discussion of how carbon offset projects would manifest depending on the land use designation. This would be particularly important in the subunits where commercial timber is newly allowed.	The purpose of Carbon-related policy in the HSFRMA MP is to create opportunities for projects to be proposed or considered. Details related to the viability, feasibility, or benefit of a potential project would be discussed in the decision documents (Best Interest Finding) related to a specific project.	No change
Carbon Offsets and Carbon Management	If HSF were to produce a legitimate carbon offset plan that refrains from artificially inflating the timber base, retains old growth and protects intact forest, such a plan could be a valuable contributor to state coffers that could gain widespread public support while preserving wildlife habitat, recreation, and scenic values.	Noted	No change

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Carbon Offsets and Carbon Management	AS 41.15.315(e) requires that the HSFRMA plan be amended to allow carbon offset projects (not a carbon offset program), but remains silent regarding carbon leasing. Change "Carbon Offset Program" to Carbon Offset Projects", which could include DNR-undertaken projects under the carbon offset program and third-party undertaken projects on leased land under AS 38.05.081 (carbon management leasing).	Comment noted. Discussion of carbon offset projects will be removed from the <i>Forest Timber Products</i> section of Chapter 2 and a new section entitled <i>Carbon Management Leasing and Carbon Offset Projects</i> will be added to chapter 2.	Describe carbon-related concepts using recommended language. See Attachment 2: Carbon Management Leasing and Carbon Offset Projects
Carbon Offsets and Carbon Management	[allowing timber harvest in all classifications] in an attempt to gain carbon offsets is insulting to anyone who understands the process. Carbon offsets can be a much better alternative than clearcutting the remaining forest, but only if old growth forest is removed from the timber base and given permanent protected status, not by making the entire forest available to be logged.	The proposed amendment will allow forest management activities in Wildlife and Public Recreation classified lands when those actions support or enhance the values for which those lands are classified. This change is proposed to bring the management policy for lands within the HSFRMA into alignment with the primary purposes stated in AS 41.15.300.	No change
Carbon Offset Projects and Carbon Management	We support the development of carbon offset projects in the HSF and appreciate that the 2026 plan creates a pathway for them. We ask only that carbon projects not require the harvest of old-growth stands, which are the most carbon-dense and ecologically valuable forests in the HSF. Carbon offsets, tourism, fisheries, and subsistence uses are all compatible with an intact forest and with each other. We encourage the DFFP to prioritize these uses as a package when evaluating management options for specific areas.	Noted	No change

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Carbon Offset Projects and Carbon Management	Carbon offset projects do not involve the "sale" of public resources. Change "sale" to "utilization", a broader term which would include the disposal of timber through timber sales as well as the use of forest resources for carbon offset projects.	The terminology "sale" is specific to the statutory language that describes DFFP responsibilities and authority for management of timber resources.	Remove discussion of carbon-related authorizations from Chapter 2, <i>Forest Timber Resources</i> . Insert a standalone section in Chapter 2 describing management guidance for carbon offset projects. Align policy language Carbon-related section with recommendation. See Attachment 2 for more information
Coordinated Management	Manage the HSF with respect for its clear impacts on the Alaska Chilkat Bald Eagle Preserve	Concur	No change
Coordinated Management	<i>Commenter describes historical context of co-creation of CBEP and HSF RMA.</i> In order to manage according to its mandate, the HSF should have clear, consistent, current guiding documents and up-to-date scientific studies backing its management decisions. Results of HSF management actions should clearly show over time that, for example, HSF actions do not result in "significant impairment of the productivity of the land and water with respect to renewable resources."	Feedback from sister agencies on each planning and decision document produced by DFFP contributes to the ongoing assessment of forest management impacts to other resources. The Forest Resources and Practices Act requires a focus on water quality and habitat through this process.	No change

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Coordinated Management	The DNR has previously identified appropriate uses for specific subunits in the HSF with reference to their proximity to the Preserve. In the 2002 management plan, for example, the DNR explained that the management of Subunit 8b (Chilkoot Lake) was to be “similar” to management of “adjoining lands within the [Preserve]” and would “focus on the maintenance” of “these resources”—referring to Preserve resources. The 2026 draft largely omits discussion of the Preserve, relegating its minimal discussion to the introduction of the section discussing Unit 8. This change in management approach represents a complete failure by DNR to acknowledge the interconnection between the two management areas, endangering the values for which both were established.	The management policy within the HSF RMA MP applies to state-owned lands within the HSF RMA boundary and is developed to support the primary purposes of the HSF RMA (AS 42.15.300). It is beyond the scope of this document to discuss management intent or guidance related to the purpose of the Alaska Chilkat Bald Eagle Preserve. The management policy for Subunit 8b emphasizes public recreation and fish and wildlife habitat values and requires all activities in this subunit to be compatible with the protection or enhancement of salmon spawning and rearing habitat.	No change
Coordinated Management	Advocate for Cooperative Agreements for tribes after the passing of HB 123 in 2022	A cooperative agreement or contract for the administration of FRPA is possible (AS 41.17.055(e)). Such an agreement falls outside the scope of a forest management plan and would be established as an independent document.	No change
Coordinated Management	recommend that the HSF RMPA include stronger direction in its management guidelines and intent regarding interagency cooperation, coordination, and information sharing. including more specific language, intent, and clear process can provide stronger guideposts for the multiple-use management of the HSF.	Requirements for development of a management plan, including inter-agency coordination, are described in AS 38.04.060-.070, AS 41.15.320, and in the notice requirements of AS 38.05.945.	No change

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Citizen's Advisory Committee	Management of HSF RMA should include a Citizen's Advisory Committee specifically for the state forest.	Enabling statutes for the HSF RMA identify the Alaska Chilkat Bald Eagle Preserve Advisory Council as the advisory body for administration of the HSFRMA.	No change
Conservation Management	we urge DNR to recognize that the HSF is not just a poor producer of merchantable timber, it is an irreplaceable biodiversity hotspot and wildlife corridor that will only increase in value as the climate continues to change. Implementing conservative management strategies, potentially including a valid carbon offset plan that preserve ecological functions in this unique landscape, can increase numerous benefits for this and future generations.	The sustained yield management model and annual allowable cut calculation are conservation strategies developed for the HSFRMA based on comprehensive inventory of forest stands within the HSFRMA. More than 57,000 acres within the HSFRMA are assigned "Habitat" land use designation and require management activities within those lands be designed to support or enhance wildlife habitat values.	No change
Conservation Management	a moratorium on all sales within the highly fragmented Kelsall watershed should be maintained.	To remain consistent with the primary purpose of the HSFRMA described in AS 41.15.300, use of renewable resources such as timber will remain possible in Unit 1 (Kelsall River). Specific methods of access and harvest will be determined during the planning and review process for individual sales.	No change

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Conservation Management	Develop guidance on management of “post fledging areas” around each 100-acre goshawk nest buffer, to protect adequate habitat for fledglings learning to fly and hunt.	Policies addressing the management or monitoring of wildlife populations are outside DFFP authority. The DFFP defers to the expertise of Alaska Department of Fish & Game (ADF&G) for management recommendations when decisions are required related to conflicts between habitat values and another resource.	No change
Conservation Management	Increase seasonal buffers around known wolf dens to reduce disturbance during puprearing, and maintain adequate forest cover for wolves and their prey species.	Policies addressing the management or monitoring of wildlife populations are outside DFFP authority. The DFFP defers to the expertise of Alaska Department of Fish & Game (ADF&G) for management recommendations when decisions are required related to conflicts between habitat values and another resource.	No change
Conservation Management	Improve connectivity of Small Old-Growth Reserves (through corridor protection and forest restoration) for flying squirrels and other wildlife.	Areas of forest retention are identified in the design of individual sale units. Site-specific recommendations can be made during the review of Best Interest Findings and Forest Land Use Plans for individual sales.	No change
Conservation Management	Consider additional conservation measures for species with emerging conservation concerns - little brown bat, western screech owl.	Policies addressing the management or monitoring of wildlife populations are outside DFFP authority. The DFFP defers to the expertise of Alaska Department of Fish & Game (ADF&G) for management recommendations when decisions are required related to conflicts between habitat values and another resource.	No change

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Conservation Management	Develop monitoring programs for vulnerable species to inform adaptive management.	Policies addressing the management or monitoring of wildlife populations are outside DFFP authority. The DFFP defers to the expertise of Alaska Department of Fish & Game (ADF&G) for management recommendations when decisions are required related to conflicts between habitat values and another resource.	No change
Consultation	recommend that DFFP establish a formal consultation framework between CIV and DFFP in Chapter 4 of the draft HSF RMA MP. Formalizing the relationship between CIV and DFFP, strengthens our long-term relationship, reduces the risk of knowledge transmission loss through any staff turnover, and creates more consistent opportunities for our knowledge, stewardship practices and principles, and community priorities to inform management decisions	The consultation requirements for development and administration of the HSFRMA MP are described in statute (AS 41.15.310 and AS 41.15.320). The DFFP acknowledges the value of communication and information sharing between the Division and all individuals and groups with an interest in the management of Alaska's State Forests. The DFFP's public process is designed to facilitate engagement from a wide range of interest groups, including Alaska Native entities, local governments, non-government organizations, and private citizens.	No change
Consultation	Establish regular, at least quarterly meetings, to discuss issues of mutual concern regarding forest management and RMP implementation, including: (1) Discuss the management of state forest land and provide management recommendations to the Director, DOF (2) Review issues and activities on DNR-managed forested land and recommend management policies to the Director, DOF.	The DFFP is available to discuss planning and management of lands within HSFRMA. Discussion opportunities can be coordinated through the DFFP Haines Area Office.	No change

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Consultation	As a division of the DNR, the HSF is subject to a procedural obligation to “consult with the division of parks, the Department of Fish and Game, including each local fish and game advisory committee with jurisdiction in the area, and the Alaska Chilkat Bald Eagle Preserve Advisory Council to promote effective, efficient, and coordinated administration” of the HSF and the Preserve, in keeping with the “the values for which each is established.” However, as detailed by the Upper Lynn Canal Fish and Game Advisory Council and reported by the Chilkat Valley News, HSF appears to have treated its obligations as boxes to check rather than legitimate consultation duties.	DFFP interprets "effective, efficient, and coordinated administration" (AS 41.15.310) to describe the expectations for implementation of management policy within the HSFRMA but does not apply to the development of policy. DFFP consults Fish and Game Advisory councils through the local ADFG habitat biologist during inter-agency review of decision documents and through their presence on the Alaska Chilkat Bald Eagle Preserve Advisory Council.	No change
Ecological Values	This Chilkat Valley has been recognized as a globally significant area of biodiversity and this value needs to be protected and the trees are the foundation of this.	Comment received.	No change
Fish and Wildlife Habitat	recommended the plan address how forest connectivity and landscape-scale ecological function will be maintained as harvest expands into previously protected areas. The 2026 plan does not include a cumulative effects analysis or a connectivity discussion. We recognize this kind of analysis is complex and resource-intensive. We encourage the DFFP to develop a framework for evaluating cumulative watershed effects before harvest is proposed in sensitive areas, and we would be glad to participate in that process.	Each proposed timber harvest is subject to review by sister agencies including Alaska Department of Fish & Game and Alaska Department of Environmental Conservation. DFFP defers to the expertise of these sister agencies to evaluate the potential impacts of harvest activities on habitat and water quality values. Additional research initiatives proposed by other entities that are compatible with the primary purposes of the HSFRMA are encouraged throughout the Forest. DFFP does not have dedicated staff or funding for a research branch.	No change

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Fish and Wildlife Habitat	Anadromous Stream Buffers. We recommend extending the existing 300-foot Special Management Zone to include uncatalogued tributaries to catalogued anadromous streams. Consider tributary protection on a sale-by-sale basis and to consult with ADF&G Habitat on each proposed sale in areas with uncatalogued streams.	It is the policy of the DFFP to defer to Alaska Department of Fish & Game to identify riparian retention areas for surface waters that are not included in the ADF&G Anadromous Waters Catalogue.	No change
Fish and Wildlife Habitat	Please incorporate by reference LCC's comments on HSF management plans and timber sales to present. See especially Thunder Creek Appeal and Request for Reconsideration of Thunder Creek Appeal, 1996.	Please see individual sale decision documents for DFFP responses to comments submitted.	No change
Fish and Wildlife Habitat	Recommend a comprehensive biological survey throughout HSFRMA.	DFFP does not have dedicated staff or funding for a research branch. Additional research initiatives proposed by other entities that are compatible with the primary purposes of the HSFRMA are encouraged throughout the Forest. These types of surveys are developed and implemented by ADFG as the lead agency with necessary expertise.	No change
Fish and Wildlife Habitat	Recommend wildlife designations surrounding Bald Eagle Preserve	Land use designations are determined based on a broad review of resources present on the landscape and potential uses. No land classification changes are proposed in this MP revision in recognition of the years of analysis and resolute planning process that occurred in the development of the first MP in 1986.	No change

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Fish and Wildlife Habitat	concern that while the plan retains Wildlife Habitat and Recreation as “primary” classifications for previously protected lands, it provides no standard for determining when a proposed timber sale would be consistent or inconsistent with those designations. If a primary classification means anything, there must be some basis on which a proposed sale could be found incompatible with it. The plan provides none, which means those classifications offer nominal protection rather than real protection. I would ask the DFFP to develop and publish a clear compatibility standard before any timber sales are proposed in previously protected areas.	The management plan identifies timber harvest as a possible use on Wildlife Habitat and Recreation classified lands. Opportunities for ADF&G and members for the public to identify specific parameters or incompatible sites are provided through agency and public review of FYSTS, BIF, and FLUP documents.	No change
Fish and Wildlife Habitat	There is a straightforward alternative worth considering: rather than opening all protected lands to commercial harvest, DFFP could retain the 2002 plan’s protections while permitting small, ecologically justified forest treatments in Wildlife Habitat and Recreation lands for fire management or habitat restoration purposes only. That approach would honor the intent of multiple-use management and the Forest’s established ecological values without foreclosing timber opportunity in the areas already available for harvest.	The restrictions described in the 2002 HSF RMA MP preclude the use of forest treatments for fire management or habitat restoration in Wildlife Habitat and Public Recreation designated lands. The proposed changes to management policy create opportunities for forest management activities when those actions contribute to the primary values of Wildlife Habitat and Public Recreation designated lands.	No change
Fish and Wildlife Habitat	The amendment acknowledges that units around the Takhin, Chilkat Inlet, and Chilkoot Lake were previously designated primarily for wildlife habitat and recreation and are now being considered for timber. While unit guidelines call for smaller even-aged harvest blocks, screening from the highway or Chilkat Inlet, and coordination with ADF&G, the plan does not clearly quantify or map how much of these units will remain functionally managed for habitat, recreation, and scenic values, nor does it make explicit “findings of incompatibility” and benefits as required by AS 41.17.230(a).	Specific areas of harvest activities or retention will be identified in the Forest Land Use Plan for individual proposed timber sales. These decisions will identify areas specifically managed to meet the goals for the primary designation of the unit.	No change

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Subject	Issue Summary	Response	Recommended Change
Forest Resources	Recommend development and publication of a clear standard for evaluating proposed timber sales in Wildlife Habitat and Recreation classified units for consistency with those primary designations, before any sale is proposed in previously protected areas.	Evaluation for compatibility of individual sales with the management intent of respective HSF RMA units will occur through agency and public review of each sale.	No change
Forest Resources	Recommended defining old-growth forest in the HSF as stands free from logging for at least 200 years and prohibiting commercial harvest of such stands.	“Old Growth” is a subjective term that would require varying definitions for different stands throughout the forest. When possible, forest management strategy and activities are designed at the time of proposed action to reflect the natural disturbance regime and environmental influences that affect an area. Recommendation Noted.	No change
Forest Resources	The 2026 plan retains clearcutting as the primary method in Forest-designated lands, with units up to 160 acres. We understand this reflects established practice and economic considerations. We ask that the DFFP consider, on a sale-by-sale basis, whether selective harvest methods could achieve timber objectives while reducing impacts to fish and wildlife habitat, particularly in areas adjacent to anadromous streams.	Even age harvest is not identified as the primary method of harvest for any classification of land in the 2026 plan. The purpose of the management plan is to provide broad guidance related to uses or activities that may possibly occur within HSFRMA. Harvest unit design, harvest methods, and methods of regeneration and access are determined in the Forest Land Use Plan on an individual sale basis.	No change

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Restoration	We recommended adding Restoration as a formal land-use category, with priority given to areas where past logging has caused lasting ecological harm. The most pressing need we identified is the Kelsall River watershed, which the 2002 plan recognized as the largest Chinook salmon spawning area in the Upper Lynn Canal and which has experienced a serious decline in productivity since that time. The 2026 plan does not include a restoration category. We ask the DFFP to consider how restoration objectives can be incorporated into future planning and sale design in degraded areas, particularly those with documented salmon habitat concerns	Land use designations must be tied to Classifications defined in 11 AAC 55.050 – 11 AAC 55.230. Current Alaska Administrative Code does not include restoration as a land-use category.	No change
Forest Resources	Opposition to timber harvest in old growth stands	Noted	No change
Forest Resources	Opposition to even-age timber harvest	Noted	No change
Forest Resources	Recommend partial-cut and selective harvesting in all wildlife habitat and public recreation designated lands and reflect these priorities in management guidelines for each unit and subunit.	In some cases, an even-age harvest may be the best way to support or enhance the values for which Wildlife Habitat and Public Recreation lands are designated. The plan is written to accommodate a wide range of potential management scenarios across the life of the plan.	No change
Forest resources	Recommend including stand parameters on forestry designated lands in order to effectively preserve the “future options of the people of the state,” AS 41.17.060(c)(1), and in respect of the other resource constraints and balances developed through the FRPA. AS 41.17.060(c)(2)-(7).	Stand-level specificity in defining management parameters is outside the scope of this planning effort. The Management Plan is intended to describe broad management goals at a landscape scale. Specific objectives and methods to achieve them are determined for individual projects in the development of Best Interest Finding and Forest Land Use Plan documents.	No change

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Subject	Issue Summary	Response	Recommended Change
Forest Products	Support of banning export sales	The State of Alaska does not have the power to regulate interstate or international commerce. See U.S. Constitution, Article I, Section 8.	No change
Forest Products	Support of harvest of house logs and firewood by citizens by permit	Concur	No change
Forest Products	Support of small timber sales to benefit local sawyers and their customers	Concur	No change
Forest resources	Conduct a watershed-scale cumulative impacts assessment for the Chilkat, Chilkoot, and Ferebee drainages.	The mission of the DFFP is to provide a sustainable supply of forest resources to Alaskans. Assessments of environmental impact or watershed quality are beyond the DFFP scope of responsibilities, and the Division does not have access to staff or funding for such projects. A cumulative impacts assessment on watersheds within the HSFRMA is possible through proposal and execution by an entity other than the DFFP.	No change
Planning Process	Opposition to Management Plan Amendment	Noted	No change
Planning Process	Support of Management Plan Amendment	Noted	No change
Planning Process	Insufficient project planning and scoping opportunities.	The process for the current amendment of the HSFRMA MP has been designed to meet and exceed the requirements of AS 38.04.065, AS 38.05.945, AS 41.14.300-330, and AS 41.17.200-230.	No change
Planning Process	Recommend recommence HSFRMA management plan amendment process.	Noted	No change

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Planning Process	SEACC recommends revisiting the decision to identify commercial timber across all land designations and instead returning to or refining the previous unit-based approach: Maintain or strengthen Wildlife Habitat and Public Recreation designations in areas where habitat, scenic, and recreation values are primary, and clearly explain where timber is incompatible and why, as required by AS 41.17.230(a).	As 41.17.110 outlines the duties of the DFFP, including “a fundamental obligation to ensure that management of forest resources ensures perpetual supplies of renewable resources...and serves the needs for all Alaska for the many products, benefits, and services obtained from them.” Identification of opportunities to provide Alaskans access to forest resources throughout the HSFRMA is a primary responsibility of the DFFP. The management plan describes timber harvest as a possible use throughout the Forest and in some cases provides recommendations for timber sale design in areas where additional guardrails are required to meet the sustained yield mandate.	No change
Planning Process	Reorient timber management away from large, speculative export-oriented sales and toward locally scaled opportunities that meet community needs (for example, firewood, house logs, and small-mill supply) and lower-impact treatments, in keeping with FRPA’s direction to support the continuation of businesses and lifestyles that depend on forest resources (AS 41.17.060(c)(3)).60	The mission of DFFP is to manage a sustained yield of timber resources for all Alaskans. The management plan is written to accommodate a range of possible scales of harvest that can be dynamic and adapt to changing demand over time throughout the life of the plan.	No change
Consultation	<i>the State should adopt, within the HSF RMA plan, a standing consultation protocol specifying:</i> Minimum review time frames and information that will be provided (e.g., maps, growth assumptions, economic analysis, habitat modeling);	Required review standards, timeframes, and communication with interested parties during DFFP planning processes are described in AS 38.04.065, AS 38.05.945 and AS 41.15.300 – AS 41.15.330.	No change

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Consultation	<i>the State should adopt, within the HSF RMA plan, a standing consultation protocol specifying: At what stages in plan amendments, Five-Year Timber Schedules, and FLUPs that CIV, CIA, the Upper Lynn Canal Fish and Game AC, the Bald Eagle Preserve AC, Borough, and the public will be engaged</i>	Development of the HSF RMA MP is designed to comply with AS 38.04.065, Land Use Planning and Classification. As an action related to classification, the amendment of the HSF RMA MP is also subject to AS 38.05.945, Notice. The sections of statute listed above, in addition to AS 41.15.310 and AS 41.15.320, state the roles of specific groups or organizations in planning processes related to the HSF RMA. As a division of DNR, the DFFP follows the planning process that has been developed by DNR Division of Mining, lands, and Water (DMLW) Resource Assessment and Development Section (RADS), the primary planning entity for state-owned lands. Consultation and planning for the HSFRMA have been consistent with the DMLW RADS process since legislative designation of the HSFRMA in 1982.	Add DNR definition of “Consultation” to Appendix A <i>Glossary</i>: “Under existing statutes, regulations, and procedures, the Department of Natural Resources informs other groups of its intention to take a specific action and seeks their advice or assistance. Consultation is not intended to be binding. It is a means of informing affected organizations and individuals about forthcoming decisions and getting the benefit of their expertise. DNR replies to parties offering advice or assistance by informing them the decision and the reasons for which the decision was made or notifying them that the decision and finding are available upon request.” Add description of consultation efforts and public engagement opportunities from current planning effort to Chapter 1, <i>how this plan was developed</i> as a reference for future planning efforts.
Consultation	the State should adopt, within the HSF RMA plan, a standing consultation protocol specifying: How DNR will document and respond to substantive comments, including any disagreements with ADF&G or DEC and how “due deference” was applied	See above	See above

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Consultation	the State should adopt, within the HSF RMA plan, a standing consultation protocol specifying: Commit to at least annual joint meetings between DFFP, ADF&G, DEC, the Borough, and advisory bodies focused on HSF RMA implementation, with public participation.	Meetings with the Chilkat Bald Eagle Preserve Advisory Council (CBEP AC) serve this purpose and include representation from all the entities described except DEC. The CBEP AC may choose to invite relevant DEC staff to attend one meeting annually to participate in discussions related to the administration of CBEP and HSRMA.	No change
Planning Process	Respect the input of local communities and make appropriate changes to the proposed plan.	Concur	No change
Planning Process	Work with the communities of Haines, Klukwan and the Chilkat Valley to craft a community forest plan responsive to the economic changes seen in the area since the HSF and Eagle Preserve were founded	Concur	No change
Planning Process	recommend the HSF RMPA be amended to include policy language committing to using the best available science, including Indigenous Knowledge, in management decision-making.	It is State management policy to implement all resource management decisions based on the best available science. The review and comment process for decision documents invites all individuals and organizations to contribute information or specific knowledge to the final decision at a project level.	No change
Planning Process	Work with the community to prioritize scenic recreation opportunities	Concur	No change
Planning Process	The amended plan should encourage collaboration with partners and support the consideration of new information as it becomes available	Concur	No change

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Economic Analysis	Recommend conducting comparative economic analysis of timber versus non-timber values and potential impacts of logging on non-timber values including water quality, fish habitat, wildlife, and soil stability	The mission of the DFFP is to provide a sustainable supply of forest resources to Alaskans. The management plan describes timber harvest as a possible use throughout the Forest and in some cases provides recommendations for timber sale design in areas where additional considerations are required to meet the sustained yield mandate. Large-scale economic analysis is beyond the scope of DFFP responsibilities. Discussion of potential impacts to other uses and resources occurs through the review and publication of FYSTS, BIFs, and FLUPs at an individual sale level.	No change
Economic Analysis	Require any economic assessment to fully account for infrastructure and administrative costs (including roads and transport to any LTF) and to evaluate effects on subsistence harvests as a reduction in local economic inflows, recognizing subsistence use as a form of non-cash household income that may be diminished by timber activities.	Economic analysis of timber sales through the timber sale decision process includes the assessment of road development. Impacts to resources are evaluated by the state during individual project development including the ADF&G. ADF&G considers impacts to subsistence game species when contributing to the project development. Timber harvest activities can improve habitat for some subsistence species in Alaska.	No change
Multiple Use Management	Members of the public depend on lands within the HSF for subsistence, sport, or commercial fishing, hiking, biking, boating, camping, or other recreation, spiritual solace, berry picking, mushroom harvesting, trapping, skiing, bird watching, wild plant medicines, clean air and water, hunting	Noted	No change

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GENERAL COMMENTS			
Subject	Issue Summary	Response	Recommended Change
Multiple Use Management	make changes to the proposed plan that encourage and allow multiple uses of the state forests for all of the years to come	Noted	No change
Land Use Classifications	Recommend areas 1A, 2A, B, 4B, C,D, 5, 6A, B, 7A, B, 8A, B, C, D, 9A, B, C be added to wildlife and recreation and removed from the timber base.	Prohibiting timber harvest on lands within the HSFRMA does not align with the statutory primary purpose identified for lands within the HSFRMA (AS 41.15.300).	No change
Land Use Classifications	Support of keeping the distinct units in the HSF plan and prohibiting any logging in Wildlife Habitat and Recreation units	The proposed amendment will allow forest management activities in Wildlife and Public Recreation classified lands conditionally when those actions contribute to the values for which those lands are classified. This change is proposed to bring the management policy for lands within the HSFRMA into alignment with the primary purposes stated in AS 41.15.300.	No change
Water Quality	Recommended establishing a forest-wide monitoring program for habitat conditions in the Chilkat, Chilkoot, and Ferebee watersheds. No monitoring program is included in the draft. We believe monitoring is essential to responsible adaptive management — it allows the DFFP to detect problems early and adjust practices before serious harm occurs. We strongly encourage the DFFP to develop a monitoring framework, and we are willing to assist with data collection where we can.	The Forest resources and Practices Act (AS 41.17) includes provisions requiring implementation and effectiveness monitoring for the water quality protection measures that are required in timber sales on state owned lands. Additional research initiatives proposed by other entities that are compatible with the primary purposes of the HSFRMA are encouraged throughout the Forest.	No change

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Subject	Issue Summary	Response	Recommended Change
Scientific Resources	The management plan should acknowledge that scientific research, Indigenous Knowledge, agency data, and monitoring conducted by Tribal governments, academic institutions, nonprofit organizations, and other partners can provide valuable information for understanding changing conditions within the Haines State Forest.	The value of such contributions is acknowledged by the statutory requirements of AS 38.04.065, 11 AAC 55.020, and AS 38.04.095, which describe the public involvement standards of DNR planning processes. Opportunities for the information described in this comment to be shared are provided through the public review and comment periods of the planning process for management plans, FYSTS, BIFs, and FLUPs.	No change
Pesticides	Opposition to pesticide use in HSFRMA, including treatment of invasive plant species.	Noted	No change
Riparian buffers	1,000 ft buffer recommendation for shoreline should be applied to the major rivers - Klehini, Kelsall, Chilkat and Chilkoot, Chilkoot Lake - such a corridor also better protects water quality and salmon habitat.	Buffer protection measures contained in the HSF MP were developed to meet or exceed the requirements established in the FRPA. The standards found in the FRPA were developed based on scientific studies supported by the ADF&G. The HSF MP meets or exceeds the buffer requirements in FRPA.	No change
Forest Protection	Revise Goal statement and Fire Management Guidelines to clarify wildland fire planning documents and response jurisdictions.	Concur.	See Attachment 3
Climate Change	SEACC recommends that the revised plan: Explicitly recognize climate-driven changes in growth rates, hydrology, and landslide risk in the Chilkat and Tsirku basins, and integrate these into AAC, road location standards, and riparian protections.	Reoccurring inventory projects track growth across the forest. The FRPA and Regulations provide guidance for road building and design in the Forest, and adaptive management is part of the FRPA framework through required implementation and effectiveness monitoring. As each new set of forest	No change

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		inventory is collected a reevaluation of the AAC occurs and changes to harvest plans logically follow.	
Climate Change	Recommend addition of "Climate Change" management policy to Chapter 2 of the HSF RMA MP	Noted.	"Climate-Adapted Forest Management" management guidelines will be added under the <i>Forest Protection</i> section of chapter 2. See Attachment 3 <i>Climate-Adapted Forest Management</i> for more information
Climate Change	<i>Recommended Background:</i> Alaska's forests are experiencing the impacts of climate change. Alaska's fire seasons are beginning earlier and lasting longer. Fires are larger and more resistant to control because of hotter, drier weather. There is high need for strategic fuels management to help reduce risk to communities and important infrastructure. Additionally, climate change affects ecosystem services and the benefits of trees and forests to communities. Surface air temperature and precipitation as well as wind and cloud cover, which in turn interact with biophysical factors including snow and ice, invasive species, and insects and disease, drive climate in the coastal forests of Alaska. Forest insect outbreaks are also connected to increasing temperatures.	Recommendation noted.	See Above
Climate Change	<i>Recommended goal:</i> Protect forest resources from economically and ecologically damaging insect outbreaks and disease through active forest management and silvicultural treatments.	This goal is addressed in Chapter 2, Forest Protection, under Forest Health Management	No change
Climate Change	<i>Recommended goal:</i> Enhance forest resilience to climate change by managing for changing conditions, sustaining ecosystem health, and preparing for climate-related disturbances.	The DFFP uses active forest management to support diverse and resilient forest landscapes and to mitigate potential risk related to natural disturbance.	See Attachment 3

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Climate Change	<i>Recommended goal:</i> Apply adaptive management and, where appropriate, seek and apply TEK, to drive sound and responsive forest management.	The Forest Resources and Practices Act and Regulations require implementation and effectiveness monitoring. The State's project development process includes the public and other organizations interested in contributing specific knowledge to project design. State agencies with specific expertise related to important resources such as fish and wildlife contribute to project design through the decision process. The State applies this process objectively to create sound and responsible project management contributing to the sustained yield of forest resources.	See Attachment 3
Climate Change	CIV encourages DFFP to develop management guidelines in furtherance of this management policy and identified goals. Where appropriate and applicable, CIV recommends considering adoption of provisions in Tanana Valley State Forest RMP and the 2020 Alaska State Forest Action Plan	Noted.	See Attachment 3
Climate Change	Climate Change should be listed in resource management policies, in the section titled "other guidelines affecting" Fish and Wildlife Habitat, Forest Timber Resources, Forest Protection, Recreation, and Water Quality, Quantity, and Riparian Areas.	Noted.	No change
Traditional Ecological Knowledge	recommend TEK (Traditional Ecological Knowledge) be given a definition and a role in management decisions in the RMPA. TEK can help shape the management guidelines for units within the forest, it can be identified as a source of data to be sought out and, where appropriate, relied on in resource inventories throughout the forest, and it can be applied as a management intent on a unit-specific basis. Each and any of	ADNR does not have a legal definition or a management framework to address Traditional Ecological Knowledge (TEK).	No change

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	these approaches would meaningfully improve the broad base of relevant experience, data, information, and expertise upon which DFFP draws in its management of the Haines State Forest. Recommend adoption of the definition applied in the Gravel to Gravel Memorandum of Understanding: “Traditional Ecological Knowledge (TEK or TK): a living body of knowledge which pertains to explaining and understanding the universe and living and acting within it. It is acquired and utilized by indigenous communities and individuals in and through long term sociocultural, spiritual, and environmental engagement. TK is part of the broader knowledge system of indigenous communities, is transmitted intergenerationally, is practically and widely applicable, and integrates personal experience with oral traditions. It provides perspectives applicable to an array of human and nonhuman phenomena. It is deeply rooted in history, time, and place, while also being rich, adaptable, and dynamic, all of which keep it relevant and useful in contemporary life. This knowledge is part of, and used in, everyday life, and is inextricably intertwined with peoples’ identity, cosmology, values, and way of life. Tradition—and TK—does not preclude change, nor does it equal only ‘the past;’ in fact, it inherently entails change.”		
Traditional Use	Amend Chapter 2 by including a standalone management policy for traditional use. Recognizing that “traditional use” is not a land classification that exists under Alaska law or regulation, it must still be acknowledged and managed under the RMP and afforded the same level of attention as other valuable resources for the Department to fulfill the forest’s purposes. <i>Commenter provides recommended goals, guidelines, and resource allocation summary language for a “Traditional Use” section in Chapter 2.</i>	In the enabling statutes for HSFRMA, traditionally compatible uses are defined as “[including but not limited to] fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood.” These uses are addressed in the management plan through guidelines related to fish and wildlife	No change

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		habitat, recreation, transportation, and forest resources. In addition, AS 38.04.200 requires agencies to manage lands and water to maintain “traditional means of access for traditional outdoor activities.” Definitions for “Traditional Means of Access” and “Traditional Outdoor Activities” are established in AS 38.04.200(b).	
Traditional Use	<i>Recommended Guideline:</i> Identification Identify traditional uses in the Haines State Forest, including traditionally compatible uses, levels and traditional methods and means, and areas where traditional use is practiced. Identification should include the following: A. Consult with individuals and communities that practice traditional use in the Haines State Forest, including local Alaska Native Tribes. B. Utilize available statutory authorities pursuant to AS 14.15.310 and 41.15.325 to develop resource studies and cooperative agreements with individuals and community groups that practice traditional use to identify traditional uses, areas of traditional use, and management policies for continuation of traditional use. C. Acknowledge the special expertise of traditional ecological knowledge (TEK) holders as highly informed on traditional uses of the Haines State Forest. D. Where appropriate as determined by TEK holders, seek and incorporate TEK into resource identification, planning, monitoring, and management.	In the enabling statutes for HSFRMA, traditionally compatible uses are defined as “[including but not limited to] fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood.” These uses are addressed in the management plan through guidelines related to fish and wildlife habitat, recreation, transportation, and forest resources. In addition, AS 38.04.200 requires agencies to manage lands and water to maintain “traditional means of access for traditional outdoor activities.” Definitions for “Traditional Means of Access” and “Traditional Outdoor Activities” are established in AS 38.04.200(b).	No change

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Traditional use	<i>Recommended Guideline:</i> Mitigation All Forest resource use activities should be conducted with planning and implementation to avoid or minimize adverse effects on opportunities for traditional use within the forest. Mitigation should include the following: A. Address adverse effects on traditional use and access to areas of traditional use in Best Interest Findings (BIFs) and Forest Land Use Plans (FLUPs), in coordination with affected individuals and communities who practice traditional use, with the goals of identification, assessment, avoidance, and mitigation. B. Engage in early and ongoing consultation with potentially affected Alaska Native and Tribal communities regarding project effects on traditional use. C. Avoid loss of access to known areas of traditional use during resource development activities. D. Maintain habitat conditions necessary for subsistence resources, including salmon, moose, berries, medicinal plants, and other traditional resources. E. Avoid management actions and Forest resource use activities that substantially reduce access to or availability of subsistence resources and other traditional uses.	In the enabling statutes for HSFRMA, traditionally compatible uses are defined as “[including but not limited to] fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood.” These uses are addressed in the management plan through guidelines related to fish and wildlife habitat, recreation, transportation, and forest resources. In addition, AS 38.04.200 requires agencies to manage lands and water to maintain “traditional means of access for traditional outdoor activities.” Definitions for “Traditional Means of Access” and “Traditional Outdoor Activities” are established in AS 38.04.200(b).	No change
Traditional Use	<i>Recommended Guideline:</i> Continuation All Forest resource use activities should be designed to encourage continuation of traditional use of the Haines State Forest. Continuation should include: A. Evaluate cumulative impacts of Forest resource use activities on traditional use and areas of traditional use.	In the enabling statutes for HSFRMA, traditionally compatible uses are defined as “[including but not limited to] fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood.” These uses are addressed in the management plan through	No change

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	B. Where appropriate as determined by TEK holders, seek and incorporate TEK into resource identification, planning, and management, monitoring. C. Consistent with FRPA, AS 41.17, and multiple use management guidelines, ensure resource management in the Haines State Forest considers future generations and the continuation of traditional use. D. Avoid management decisions that fragment intact landscapes that bear cultural significance and support traditional use. E. Maintain traditional means of access for traditional use and to areas of traditional use, pursuant to AS 38.04.200.	guidelines related to fish and wildlife habitat, recreation, transportation, and forest resources. In addition, AS 38.04.200 requires agencies to manage lands and water to maintain “traditional means of access for traditional outdoor activities.” Definitions for “Traditional Means of Access” and “Traditional Outdoor Activities” are established in AS 38.04.200(b).	
Traditional Use	<i>Recommended Resource Allocation Summary:</i> The local community has made use of the Haines State Forest in traditional ways from time immemorial, through the establishment of the Haines State Forest Resource Management Area, and into the present day. AS 41.15.300 recognizes that one of the primary purposes of the Haines State Forest is the continuation of traditional use, which includes the subsistence lifestyle practiced by many local residents. Traditional use is practiced throughout each unit and subunit of the Haines State Forest, although the specific location, frequency, significance, and variety of uses remain underexamined. Active efforts should be made to identify and thereafter ensure continuation of traditional uses, and the resources on which they rely, throughout the forest. The department will continue to identify units and subunits where traditional use is a present resource value and develop unit and subunit management intent and guidelines accordingly. Because of the value of traditional use to the local community, and the significance of traditional use in the Haines State Forest enabling statute, the Forest Plan encourages the	In the enabling statutes for HSFRMA, traditionally compatible uses are defined as “[including but not limited to] fishing, hunting, trapping, berry picking, subsistence, and recreational uses, operation of motorized vehicles, and the harvest of personal-use firewood.” These uses are addressed in the management plan through the guidelines related to fish and wildlife habitat, recreation, transportation, and forest resources. In addition, AS 38.04.200 requires agencies to manage lands and water to maintain “traditional means of access for traditional outdoor activities.” Definitions for “Traditional Means of Access” and “Traditional Outdoor Activities” are established in AS 38.04.200(b).	No change

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	identification, collaboration, study, and management policy to ensure continued opportunities for traditional use. Management policy will be informed and improved through resource studies, coordinated management, and cooperative agreements with individuals and communities that practice traditional use of the Haines State Forest and its resources.” Traditional Use should be listed in all resource management policies, in the section titled “other guidelines affecting” resource “x”.		
Multiple Use Management	the primary purposes for the Haines State Forest are multiple use management and the continuation of other beneficial uses including traditional use. The HSF RMP must reflect this mandate and operationalize the department’s management responsibilities.	Concur	No change
Cultural Resources	Recommend adopting an overarching management policy describing "cultural resources" in chapter 2, modeled after language found in Tanana Valley State Forest Management Plan. At minimum, the revised plan should: (1) require cultural resource review prior to approving land use or development activities; (2) establish consultation procedures with Alaska Native Tribes and the Office of History and Archaeology; (3) require protective buffers and avoidance measures for identified sites; (4) include mandatory inadvertent discovery protocols; and (5) expressly acknowledge and implement the preservation policies established under the Alaska Historic Preservation Act.	The ADNOR Office of History and Archaeology (OHA) is delegated management authority over cultural resources on state owned lands. The policies of DFFP related to this topic are designed to defer to the management frameworks developed by OHA to implement AS 41.35 and associated regulations.	Add a standalone “Cultural Resources” section to Chapter 2 of the HSFRMA MP, outlining the DFFP’s process for cooperation with OHA. See Attachment 1: <i>Cultural Resources</i>
Cultural Resources	<i>Recommended Background:</i> In accordance with the Alaska Historic Preservation Act of 1971 (AS 41.35) it is the policy of the state to preserve and protect the historic, prehistoric, and archeological resources of Alaska from loss, desecration, and destruction so that the scientific, historic, and cultural heritage embodied in these resources may pass undiminished to future	Concur	See Attachment 1

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	generations. Examples of cultural resource sites that could be encountered include (but are not limited to): historical cabin remains (collapsed, standing, or foundations); historic trails; adits; dredges or other mining equipment; cultural depressions or pits; graves or cemeteries; prehistoric tools or artifacts; paleontological (fossilized) remains; and tribal sacred sites.		
Cultural Resources	<i>Recommended Goal:</i> Identify cultural resources within the Haines State Forest.	The goals of the DFFP are to preserve and protect known resources and sites and report inadvertent discoveries to OHA. The DFFP is not the appropriate state agency to perform the tasks required to accurately assess cultural resources on State lands. The appropriate agency is the Office of History and Archaeology (OHA).	No change
Cultural Resources	<i>Recommended Goal:</i> Preserve and protect cultural resources consistent with AS 41.35.	MP language will be phrased to specify application of this goal within HSFRMA boundaries.	See Attachment 1
Cultural Resources	<i>Recommended Goal:</i> Ensure forest resource use activities avoid adverse effects on cultural resources.	Cultural Resource protection guidelines will support the avoidance or mitigation of potential adverse impacts to cultural resources to the greatest extent practicable.	See Attachment 1
Cultural Resources	<i>Recommended Goal:</i> Coordinate and cooperate with potentially affected Tribes in developing cultural resource identification and protection protocols.	As a division of ADNR, the DFFP must defer to the policies and protocols recommended by OHA. Development of cultural resource identification and protection protocols must be coordinated through OHA.	No change
Cultural Resources	<i>Recommended Guideline: Cultural Resource Identification</i> DNR identifies and determines the significance of cultural resources in the Haines State Forest through: A. Cultural resources surveys conducted by Tribal partners,	Identification of cultural resources on state owned lands is managed by the DNR Office of History and Archaeology (OHA).	See Attachment 1

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	qualified DNR personnel, or pre-qualified and agency approved professional organizations. B. Encouragement of research on cultural resources within the Haines State Forest by qualified individuals and organizations, including Tribes. C. Cooperative efforts between state, federal, and Alaska Native entities for planned surveys and inventories.		
Cultural Resources	Recommended Guideline: Cultural Resource Protection Protect cultural resources through the following actions: 1. Review proposed land uses and management activities for potential conflicts with cultural resources values. 2. Cooperate with potentially affected government agencies, Alaska Native entities, statewide or local groups, and individuals to develop guidelines and recommendations on how to avoid identified or potential conflict.	Concur	See Attachment 1
Cultural Resources	Recommended Guideline: Cultural Resources in Timber Management Areas The Division of Parks and Outdoor Recreation Office of History and Archaeology (OHA) will review proposals for timber management activities through the interagency review processes for the Five-Year Schedule of Timber Sales and Forest Land Use Plans for individual sales. Areas of known historic, archaeological, paleontological, or Tribal sacred sites should not be disturbed. Timber operations shall not occur within 300 feet from the boundaries of known sites unless the OHA determines, in consultation with the DOF and potentially affected Tribes, that certain activities can occur without impacting the cultural resource. The OHA will, within the limits of staffing and funding, assess the extent and significance of the cultural resource and work with the DOF and affected Tribes to develop site-specific avoidance, minimization, or mitigation measures to balance heritage	The DFFP does not have the authority to apply additional requirements such as Tribal consultation to the workflow of OHA.	See Attachment 1

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	preservation needs with timber management. In the event that staffing or funding limitations prevent OHA personnel from performing these surveys, they may be contracted out to qualified cultural resource professionals or tribes.”		
Cultural Resources	Cultural Resources should be listed in all resource management policies, in the section titled “other guidelines affecting” resource “x”.	Noted	Revise as recommended
General Edits	Typographical errors and formatting inconsistencies noted throughout the plan	Noted	Finalize formatting throughout plan
General Edits			Adjust maps for clarity as needed

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CHAPTER-SPECIFIC COMMENTS			
Subject	Issue Summary	Response	Recommended Change
Chapter 1 – Differences between State Forest Plan and Chilkat Bald Eagle Preserve Plan	The traditional way of life of the Chilkat Valley communities is recognized as an important value and its continuation is included in the management of the Preserve. <i>[Add: Traditional use of the Haines State Forest is also a primary purpose of the forest, which will be managed for this value alongside and in alignment with multiple use principles.]</i>	The topic of this paragraph is the management framework and primary purpose of the Chilkat Bald Eagle Preserve.	No change
Chapter 1 – Modification of the Plan	State agencies assigned a collaborative role in managing the important resources of the Forest with DFFP, (ADFG, DMLW, and DPOR), <i>[Add: statutory rights holders to consultation on forest management and plan development (each local fish and game advisory committee with jurisdiction in the area, the Alaska Chilkat Bald Eagle Preserve Advisory Council, the governing bodies of each municipality in the general area, and any party exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325),]</i> as well as the public, may propose changes to DFFP initiating the Forest Plan review process and possible amendment.	Consultation requirements for planning and administration processes within the HSFRMA are stated explicitly in statute. The management plan is intended to elaborate policies for the implementation when statute language allows for multiple interpretations.	No change

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Chapter 1 – Changes in this Amendment	Revise for clarity. Revise the first paragraph to read: "This Forest Plan amendment addresses the inclusion of commercial forest resources across the Forest in the timber harvest program, aligning Forest resource use with establishing statutes. This amendment also adds policy language recognizing the State's authority to develop carbon offset projects in the Forest. In 2023, the Alaska State Legislature created a carbon offset program within DNR and authorized the Department to undertake carbon offset projects on State lands, including State Forests (AS 38.95.400-499)."	Language addressing carbon offset projects will be removed from Chapter 2, <i>Forest Timber Resources</i> . A new section will be added to Chapter 2 entitled <i>Carbon management Leasing and Carbon Offset Projects</i> . Policy discussion carbon-related authorizations will reflect the recommended revisions	See Attachment 2: <i>Carbon Management Leasing and Carbon Offset Projects</i>
Chapter 1 – Changes in this Amendment	Revise lines 11-12 to read: "Chapter 2 establishes policy relating to DNR's authority to undertake carbon offset projects in the Forest, identifies land appropriate for such projects, and provides management goals and guidelines relating to the use of timber resources for carbon offset projects." If DFFP opts to retain existing draft language, at least modify to read: "Chapter 2 contains policies relating to the Carbon Offset Program and carbon offset projects undertaken by the State under AS 38.95.400-499 and 11 AAC 78."	Language addressing carbon offset projects will be removed from Chapter 2, <i>Forest Timber Resources</i> . A new section will be added to Chapter 2 entitled <i>Carbon management Leasing and Carbon Offset Projects</i> . Policy discussion carbon-related authorizations will reflect the recommended revisions	See Attachment 2
Chapter 2 – Impacts on Subsistence	Potential impacts to subsistence activities will be considered in management decisions and through consultation with ADFG [Add: and other entities holding rights to consultation under statute or a cooperative management agreement] similarly to other sustainable resources found in the Forest.	Consultation requirements for planning and administration processes within the HSFRMA are stated explicitly in statute. There is not a practical benefit to re-stating statutory requirements in policy if no elaboration is required to guide implementation. The DFFP has an option identified in AS 41.17 to enter into cooperative agreements, but they are not required for the planning or administration of HSFRMA.	No change

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CHAPTER-SPECIFIC COMMENTS			
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Chapter 2 - Harvesting	Harvest methods may be chosen to meet harvesters' capabilities, specific current site conditions, intended site conditions, or other resource considerations for diverse management of forest stands. [Add: Harvest methods may include and be informed by principles of adaptive management and, where appropriate, traditional ecological knowledge (TEK).]	Adaptive management is the foundation of the DFFP's management approach and is integrated through FRPA's required implementation and effectiveness monitoring. As an agency of ADNR, the DFFP does not have a legal definition or management framework related to Traditional Ecological Knowledge.	No Change
Chapter 2 – Even-Aged Harvest	Items considered when reaching a decision will be topography, proximity to other natural or artificial open areas, visual effects, effects on fish and wildlife habitats, [Add: effects on traditional use and areas of traditional use,] regulation requirements, transportation and harvest system function, and relative total costs of preparation, logging, and administration. [Add: Decisions shall be made in consultation with the appropriate consulting parties under AS 41.15.310 and 41.15.325.]	Traditionally compatible uses as they are defined in AS 41.15.315 are considered as part of the decision process for any activity that involves development, including timber harvest by any method. Consultation requirements for planning and administration processes within the HSFRMA are stated explicitly in statute under AS 41.15.310 and AS 41.15.320. There is not a practical benefit to re-stating statutory requirements in policy if no elaboration is required to guide implementation.	Add statement in Chapter 2, Forest Timber Resources, 3. Harvesting, I. Best Interest Findings and Forest Land Use Plans, "These decision documents consider multiple use management and the continuation of other beneficial uses including traditional uses and other recreational activities. Traditionally compatible uses are defined in AS 41.15.315."
Chapter 2 – Cooperative Research	The DFFP will work with other agencies [Add:, any party exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325 or a resource study under AS 41.15.310(b),] and landowners to assess forest resource impacts . . . providing support for other agencies [and entities] leading research projects in the Forest.	Consultation requirements for planning and administration processes within the HSFRMA are stated explicitly in statute under AS 41.15.310 and AS 41.15.320. There is not a practical benefit to re-stating statutory requirements in policy if no elaboration is required to guide implementation.	No change

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CHAPTER-SPECIFIC COMMENTS			
Subject	Issue Summary	Response	Recommended Change
Chapter 2 – Management of Lands Designated Public Recreation	The DFFP shall coordinate with DPOR [Add: and other parties with rights to consultation under AS 41.15.310 and AS 41.15.325] in the management of recreational activities in areas where the Preserve adjoins the Forest.	Consultation requirements for planning and administration processes within the HSFRMA are stated explicitly in statute under AS 41.15.310 and AS 41.15.320. There is not a practical benefit to re-stating statutory requirements in policy if no elaboration is required to guide implementation.	No change
Chapter 2 – Cooperation with other landowners	Participate with other landowners in cooperative watershed management programs designed to maintain the water quality of local streams and rivers [Add: , including through cooperative management agreements executed pursuant to AS 41.15.325].	The DFFP has an option identified in AS 41.17 to enter into cooperative agreements, but such agreements are not required for the planning or administration of HSFRMA.	No change

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CHAPTER-SPECIFIC COMMENTS			
Subject	Issue Summary	Response	Recommended Change
Chapter 2 – Carbon Management Leasing and Offset Programs	AS 41.15.315(e) requires that the HSFRMA plan be amended to allow carbon offset projects, but remains silent regarding carbon leasing. Revise for clarity, accuracy, and to align with statutes and regulations relating to the carbon offset program and carbon offset projects in the HSFRMA. Revise paragraph to read: "Carbon offset projects undertaken by DNR in the Haines State Forest must comply with AS 38.95.400–499 and the implementing regulations in 11 AAC 78. These statutes and regulations govern program eligibility, carbon project approval, monitoring, verification, registration, revenue allocation, and project term requirements. All carbon offset activities in the Forest must be consistent with the Haines State Forest Management Plan pursuant to AS 41.15.315(e), and this Plan identifies all land use designations as appropriate for consideration of carbon offset projects." Consider adding: "Carbon offset projects undertaken by DNR must follow the procedures of 11 AAC 78, including project proposal submission, baseline establishment, quantification protocols, verification, registration, and monitoring requirements. The DNR Office of Project Management and Permitting is the delegated authority to make a written finding that a carbon offset project will best serve the interests of the State under 11 AAC 78.050, AS 38.95.410(d), and AS 38.05.035(e), in coordination with DFFP to ensure consistency with this Plan.	Many of the recommended additions are stated explicitly in statute or regulation. The management plan is intended to elaborate policies for implementation when statute language allows for multiple interpretations. There is not a practical benefit to re-stating statutory requirements in policy if no elaboration is required to guide implementation.	The management plan will identify enabling statutes (AS 38.95.400-.499) and regulations (11 AAC 78), as well as the Office of Project Management and Permitting as the delegated authority to make written findings related to DNR-initiated Carbon Offset Projects. See Attachment 2.

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Chapter 2 – Forest Timber Resources	Recommend adding more specific goals, similar to those for carbon offset projects outlined in Chapter 2-F of the 2025 Tanana Valley State Forest Management Plan (pp. 31-32). Revise to include specific management goals relating to carbon offset projects, including: (1) Create economic benefits by (a) generating revenue for the State's general fund, (b) supporting community and utility grants for renewable energy development through required contributions to the Renewable Energy Grant Fund from the sale of carbon offset, and (c) promoting local employment and the use of local support services; (2) Produce co-benefits for nearby communities by (a) enhancing ecosystem functions such as water quality and wildlife habitat and (b) improving opportunities for fishing, hunting, subsistence activities, recreation, and scenic enjoyment; and (3) Maintain access and opportunity for a range of forest uses within areas enrolled in carbon offset projects.	Concur. Goals and Management Guidelines for state-initiated carbon offset projects and externally initiated carbon management leases will be described in a standalone Carbon Management section. Due to differences in enabling statute and primary purposes, HSF RMA policies relating to carbon offset projects and/or carbon management leases will not be identical to TVSF MP language.	See Attachment 2
Chapter 2 – Sustained Yield	Revise for accuracy and alignment with language in other sections allowing carbon offset projects in the HSFRMS. Replace "including" with "and be available for".	Noted	See Attachment 2
Chapter 2 – Sustained Yield	This section could benefit from additional guidance/clarity on how carbon projects interact with sustained yield determinations. Consider adding a new paragraph entitled "Sustained Yield: Carbon Offset Projects" to read: "Carbon offset projects must not impair the Forest's ability to meet sustained yield requirements under AS 41.17.060. Carbon projects may defer harvest but cannot remove so much productive acreage, or alter harvest schedules to such a degree, that the Forest can no longer support long-term, continuous timber production. All carbon project acres must be incorporated into sustained yield and AAC modeling to ensure compliance."	The purpose of the section identified on page 2-9 is to describe the technical development of an AAC value and the role of sustained yield concepts in the management of forest resources. Guidelines related to the interaction of potential carbon offset projects with the sustained yield requirement should be included in the management guidelines that apply to carbon management and carbon offset projects.	Add recommended language as a guideline to new standalone section, <i>Carbon Management and Carbon Offset Projects</i> . See Attachment 2.
Chapter 2 – Stand Management	Revise for consistency. Replace "sequestration" with "offset".	Noted	See Attachment 2

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Chapter 2 – BIF and FLUP	Revise for clarity. Revise to read: "Timber management activities and carbon offset projects must be supported by a Best Interest Finding. Additionally, any proposed timber sale exceeding 10 acres requires preparation of a Forest Land Use Plan in accordance with AS 38.05.112."	Noted	Remove discussion of carbon offset projects from Chapter 2 <i>Forest Timber Resources</i> section. Reflect Insert new section <i>Carbon Management Leasing and Carbon Offset Projects</i> in Chapter 2, reflecting the recommended clarification. See Attachment 2
Chapter 2 – Forest Timber Resources	Revise for clarity. Current language implies that "carbon sales" are timber resource sales. They are not. Carbon offset projects are management decisions, not disposals like timber sales. Further, sales of carbon offsets (which are generated from a carbon offset project) do not require a BIF; however, undertaking a carbon offset project on state land does require a BIF. Revise footnote 7 to read: "The decision to conduct a timber sale or undertake a carbon offset project requires a written finding that the sale or project will best serve the interests of the State under AS 38.05.035(e)."	Noted	Remove discussion of carbon offset projects from Chapter 2 <i>Forest Timber Resources</i> section. Reflect Insert new section <i>Carbon Management Leasing and Carbon Offset Projects</i> in Chapter 2, reflecting the recommended clarification. See Attachment 2
Chapter 2 - Reforestation	This section could be interpreted to apply to both reforestation-based carbon offset projects and post timber-harvest reforestation. Consider revising the heading to "Post-Timber-Harvest Reforestation".	Noted. Ensuring that lands capable of supporting forest are reforested following disturbance is consistent with the purposes of the HSFRMA. Disturbances leading to reforestation needs may be natural or human-caused; however, DFFP intended this language to apply to timber harvest.	No change. Remove discussion of carbon offset projects from Chapter 2, <i>Forest Timber Resources</i> .
Chapter 2 – Resource Allocation Summary	Revise for consistency. Change "Carbon projects" to "Carbon offset projects".	Noted	Revise as recommended

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Chapter 2 – Commercial Forest	The inclusion of "carbon credits" as a timber product here is inaccurate. Delete "and including timber resource use as carbon credits."	Noted	Revise as recommended
Chapter 2 – Carbon Offsets	Revise Management Guidelines to read: "Carbon offsets generated through a forest carbon project represent verified removals of atmospheric carbon dioxide or the avoidance of emissions that would otherwise occur. In forest-based projects, these offsets are created when the Forest maintains or increases carbon storage above a defined baseline condition. One metric ton of carbon dioxide equivalent (CO ₂ e) stored or avoided equals one carbon offset credit. Carbon accounting for forest offset projects relies on detailed forest inventory and growth modeling. Existing carbon stocks are quantified through measurements such as tree species, diameter, height, and basal area, which collectively indicate the amount of carbon currently stored. Projected growth rates and stand dynamics are used to estimate future carbon sequestration, reflecting the Forest's capacity to store additional carbon over time. Forest carbon projects therefore require comprehensive measurement, analysis, and modeling to accurately determine carbon per acre and the volume of offset credits that can be generated under an approved carbon accounting methodology. The development of forest carbon projects by DNR will be led by the Office of Project Management and Permitting (OPMP) with support from the Division of Forestry and Fire Protection, to ensure alignment with Haines State Forest management objectives."	The purpose of the management plan is to identify policy for the compatible implementation of possible uses within the HSEFRMA. This level of detail in describing the mechanics of a carbon offset credit are not necessary for an effective forest management plan and may be more appropriately shared in a Best Interest Finding or proposal document specific to individual carbon offset projects.	No change
Chapter 3, Unit 1b Timber Harvest	Harvest activities proposed in this subunit will be presented for discussion at an Alaska Chilkat Bald Eagle Preserve Council meeting prior to contract execution "and will comply with consultation obligations under AS 41.15.310".	Consultation requirements for planning and administration processes within the HSEFRMA are stated explicitly in statute. There is not a practical benefit to re-stating statutory requirements in policy if no elaboration is required to guide implementation.	No change

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Chapter 3, Unit 1, Subunits 1a and 1c — Kelsall River	The 2026 plan designates Subunit 1c as Forest land and proposes to extend the existing road system. We ask the DFFP to give careful consideration to salmon habitat recovery in this watershed before any new sales are proposed, and to consult with ADF&G on the status of the Kelsall Chinook salmon population.	The Policy of the DFFP is to provide ADF&G, other agencies, and the public opportunities to review each proposed timber sale at multiple planning stages, including Five Year Schedules of Timber Sales, Best Interest Findings, and Forest Land Use Plans	No change
Chapter 3, Unit 1, Subunits 1a and 1c — Kelsall River	The Kelsall needs restoration, not more logging. At minimum, no new roads or sales should be proposed in this watershed until ADF&G has assessed the current status of the Chinook run and identified what habitat recovery would require.	See above	No change
Chapter 3, Unit 1, Impacts to Goat Habitat in the Kelsall Valley	Agency collaboration during harvest project planning with ADFG “along with other parties with rights to consultation under AS 41.15.310 and AS 41.15.325” will direct the development of Forest Land Use Plans which describe the methods for achieving the intended protection of goat habitat during timber harvest design.	Consultation requirements for planning and administration processes within the HSFRMA are stated explicitly in statute. There is not a practical benefit to re-stating statutory requirements in policy if no elaboration is required to guide implementation.	No change
Chapter 3, Unit 2, Subunits 2a and 2b — East Chilkat River	The 2026 plan designates Subunit 2a as Resource Management and Subunit 2b as Forest, allowing commercial harvest in both. We ask that any proposed sales in this area include thorough evaluation of impacts to fish and wildlife habitat and traditional access.	Agency and public review of individual sales provides opportunities for information about potential impacts to fish and wildlife habitat and traditional access to be shared. This review process occurs during the development of Five Year Schedules of Timber Sales, Best Interest Findings, and Forest Land Use Plans.	No change
Chapter 3, Unit 3, Subunit 3b—Big Boulder Creek	Big Boulder Creek, which drains into the Klehini, supports important Chinook spawning and is not adequately protected under the 2026 plan. The watershed contains very steep and unstable slopes, making it particularly vulnerable to road-related erosion and sedimentation. Given the creek’s value as salmon habitat, no logging should occur in this watershed.	Standards related to avoidance or mitigation of potential adverse impacts related to harvest operations on steep terrain are described in 11 AAC 95, Alaska Forest Resources & Practices Regulations.	No change

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Chapter 3, Unit 3, Subunit 3b — Klehini Uplands/Big Boulder Creek	The 2026 plan designates this subunit as Resource Management and allows commercial harvest without specific Big Boulder Creek protections. We ask the DFFP to recognize the importance of Big Boulder Creek and, given the steep terrain within the watershed of this creek, to consider widening the buffer protecting this catalogued anadromous stream.	Standards related to avoidance or mitigation of potential adverse impacts related to harvest operations on steep terrain are described in 11 AAC 95, Alaska Forest Resources & Practices Regulations.	No change
Chapter 3, Unit 3, Subunit 3d — Klehini River Flood Plain	The 2026 plan retains a 20-acre limit on even-age harvest in this Wildlife Habitat subunit. We appreciate that some limit was retained and ask that sale design in this area reflect the floodplain's sensitivity.	Noted	No change
Chapter 3, Unit 3, Subunit 3d — Klehini River Flood Plain	The Klehini is a dynamic, actively migrating river whose salmon productivity depends on intact riparian vegetation, large woody debris, and the ability of the channel to shift and create new habitat over time. Any timber harvest within the floodplain has the potential to significantly alter river dynamics and thus spawning and rearing habitat. No logging should occur within the floodplain.	No timber harvest is planned within the active flood plain of the river. The geographic identifier for the subunit helps guide the MP user to the adjacent forest block.	No change
Chapter 3, Unit 3, Subunit 3g — Little Salmon River	We ask that any proposed sale in this unit be preceded by careful review of fish and wildlife values with ADF&G.	The Policy of the DFFP is to provide ADF&G, along with other agencies and the public opportunities to review each proposed timber sale at multiple planning stages, including Five Year Schedules of Timber Sales, Best Interest Findings, and Forest Land Use Plans.	No change
Chapter 3, Unit 3, Subunit 3g — Little Salmon River	Commercial timber harvest should be prohibited in this Wildlife Habitat unit, consistent with the 2002 plan's approach. The combination of fish values and intact old-growth forest here makes this one of the units where the cost of opening to harvest most clearly exceeds any potential timber benefit.	Timber harvest plans within this subunit will consider impacts to existing habitat and be guided by contributions from State agencies and the public.	No change

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Chapter 3, Unit 3, Subunit 3h — Herman and Walker Lakes	The 2026 plan allows harvest here and frames logging as a potential vehicle for recreation infrastructure development. We ask the DFFP to consult with the Haines community before any sale is proposed in this unit to ensure that recreation values are fully considered.	Agency and public review of individual sales provides opportunities for information about potential impacts to recreation values to be shared. This review process occurs during the development of Five Year Schedules of Timber Sales, Best Interest Findings, and Forest Land Use Plans.	No change
Chapter 3, Unit 4, Subunits 4a and 4b — Chilkat Lake and Chilkat Ridge	Chilkat Ridge contains some of the last large-tree old growth spruce in the HSF, borders the Bald Eagle Preserve's Council Grounds, and is an important Jilkáat Kwáan cultural heritage area. Harvest in Subunit 4a could increase the risk that the Tsirku River avulses into Chilkat Lake, one of the Forest's most productive sockeye spawning areas. The 2026 plan designates both subunits for commercial timber harvest. We ask the DFFP to commission a hydrological assessment of avulsion risk before any sale is proposed in Subunit 4a, and to consult with the communities of Haines and Klukwan before any sale is proposed in Subunit 4b.	Before any timber harvest plan is approved public and agency review is required and specific inquiry of information contributing to the final decision may occur. The information may come from agencies, organizations, or other appropriate and verified means. Standards related to avoidance or mitigation of potential adverse impacts related to harvest operations on steep terrain are described in 11 AAC 95, Alaska Forest Resources & Practices Regulations.	No change
Chapter 3, Unit 4, Subunits 4a and 4b — Chilkat Lake and Chilkat Ridge	No timber harvest should be allowed in the Tsirku River floodplain, and I would ask the DFFP to commission a hydrological assessment of avulsion risk before any sale is proposed anywhere in Subunit 4a.	See above	No change

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Chapter 3, Unit 4	recommend the DFFP change the land use classifications from forestry to wildlife habitat to align with the area's (Unit 4b, Chilkat Ridge) highest and best long-term use. Chilkat Ridge's current classification has the potential to significantly alter how this area has historically functioned as an intact wildlife habitat and traditional use landscape. Despite DFFP's interest in the commercial value of the timber of area and supporting other industrial uses, the ecological, cultural, tourism, and subsistence/traditional use values of Chilkat Ridge are the defining characteristics of the subunit and provide substantially greater long-term benefits to the public.	No land classification changes are proposed in this MP revision in recognition of the years of analysis and resolute planning process that occurred in the development of the first MP in 1986.	No change
Chapter 3, Unit 5 — Takhin/Kicking Horse	This is one of the most popular moose and bear hunting areas in the valley, contains numerous anadromous streams, and borders the reach of the Chilkat River supporting the eulachon run — one of the last large healthy eulachon runs in North America. It is also important spring staging habitat for migratory birds that feed on eulachon before continuing inland. The 2026 plan allows commercial harvest here. We ask that any proposed sale give particular attention to eulachon habitat, migratory bird use, and hunting access.	Noted. Agency and public review of individual sales provides opportunities for information about potential impacts to habitat and hunting values to be shared. This review process occurs during the development of Five Year Schedules of Timber Sales, Best Interest Findings, and Forest Land Use Plans.	No change
Chapter 3, Unit 5 — Takhin/Kicking Horse	The 2002 plan's prohibition on commercial timber harvest in this Wildlife Habitat unit should be retained. Logging and road building here will cause irreparable damage to the area's natural productivity and to its long established use as a hunting area	Comment Noted. Commercial harvest and development activities in this unit will recognize the primary designation and contribute to the protection of those resources.	No change
Chapter 3, Unit 6, Subunits 6a and 6b — Chilkat Inlet	The 2026 plan allows commercial harvest in both subunits. We ask the DFFP to consult with the tourism operator and the Haines community before any sale is proposed here, and to give careful consideration to the impacts on residential and recreation values	The Policy of the DFFP is to provide ADF&G, along with other agencies and the public opportunities to review each proposed timber sale at multiple planning stages, including Five Year Schedules of Timber Sales, Best Interest Findings, and Forest Land Use Plans.	No change

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Chapter 3, Unit 6, Subunits 6a and 6b — Chilkat Inlet.	Timber harvest and road-building in Subunit 6a would be visible from homes throughout Chilkat Inlet and from the water, directly undermining the tourism and property values the area supports. Subunit 6b borders a high-value tourism development and numerous private cabins. Even small-scale logging in these areas would be in direct conflict with the other, more valuable uses of this unit.	Comment noted. Timber harvest planned in this unit will recognize the primary designation of the unit and contribute to balanced management of the resources present.	No change
Chapter 3, Unit 8, Subunits 8a, 8b, and 8d — Chilkoot River and Lake	Chilkoot Lake supports one of the two significant sockeye populations in the entire Forest and the lake has failed to meet escapement goals in recent years, signaling a system already under stress. The watershed also supports subsistence, sport, and commercial fisheries and a high-value nature tourism economy. The 2026 plan opens all three previously protected subunits to commercial harvest. We ask that before any sale is proposed in this watershed, the DFFP consult with ADF&G on the status of the Chilkoot sockeye run and evaluate whether harvest activity could affect the lake's ability to recover to historic escapement levels.	The Policy of the DFFP is to provide ADF&G, along with other agencies and the public opportunities to review each proposed timber sale at multiple planning stages, including Five Year Schedules of Timber Sales, Best Interest Findings, and Forest Land Use Plans.	No change
Chapter 3, Unit 8, Subunits 8a, 8b, and 8d — Chilkoot River and Lake	I ask that before any sale is proposed here, the DFFP consult with ADF&G on the status of the Chilkoot sockeye run and assess whether harvest activity could impair the lake's ability to recover to historic escapement levels.	The Policy of the DFFP is to provide ADF&G opportunities to review each proposed timber sale at multiple planning stages, including Five Year Schedules of Timber Sales, Best Interest Findings, and Forest Land Use Plans.	No change
Unit 9 — Ferebee River	The 2026 plan designates Subunit 9a for commercial timber harvest and identifies Taiyasanka Harbor as a future log transfer facility site. We ask the DFFP to conduct a thorough assessment of cumulative ecological impacts to this watershed before any sale or infrastructure development is proposed, given its currently undisturbed condition.	This unit has been designated for these uses since the initial MP development in 1986. Any proposed project in the area will follow the State's decision process including the public and agencies.	No change

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Chapter 4, Five-year Schedule of Timber Sales	The DFFP shall coordinate development of the Schedule(s) with other divisions and departments of the State contributing to resource management decisions in the HSFMA, including the division of parks, the Department of Fish and Game, including each local fish and game advisory committee with jurisdiction in the area, and the Alaska Chilkat Bald Eagle Preserve Advisory Council, in accordance with AS 41.15.310, and any parties exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325". The Schedule will be updated biennially.	Consultation requirements for planning and administration processes within the HSFMA are stated explicitly in statute. There is not a practical benefit to re-stating statutory requirements in policy if no elaboration is required to guide implementation. The DFFP has an option identified in AS 41.17 to enter into cooperative agreements, but they are not required for the planning or administration of HSFMA.	No change
Chapter 4 – Future Research	DFFP studies related to forest management may include the following: Collaborative studies with other state and federal agencies, local governments, and any parties exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325" on forest health	The DFFP has an option identified in AS 41.17 to enter into cooperative agreements, but they are not required for the planning or administration of HSFMA.	No change
Chapter 4 – Fish and Wildlife Research	The Alaska Department of Fish and Game has completed research projects on mountain goats and their habitat, fish species habitat and extents, moose populations and their habitat, brown bears and their habitat, and is continuing to collect information on important fish and game present in the HSFMA and their habitats. The DFFP cooperates and if possible, collaborates with ADFG, local fish and game advisory committees, the Alaska Chilkat Bald Eagle Preserve Advisory Council, and any parties exercising rights as outlined in a cooperative management agreement executed pursuant to AS 41.15.325" in support of research efforts on these resources in the Forest.	Consultation requirements for planning and administration processes within the HSFMA are stated explicitly in statute. There is not a practical benefit to re-stating statutory requirements in policy if no elaboration is required to guide implementation. The DFFP has an option identified in AS 41.17 to enter into cooperative agreements, but they are not required for the planning or administration of HSFMA.	No change