

Southeast Susitna Area Plan – Public Review Draft Issue Response Summary

Chapter 1

Commenter ⁱ	Subject (page)	Issue	Response	Recommendation
RADS/MSB	Update of Plan (1-2)	This part of the text mentions that the SSAP supersedes the Willow Sub-basin Area Plan, but it does not mention that the two other management plans affecting this area (Kashwitna and Deception Creek) are affected by the plan update. This needs to be clarified.	Concur.	Revise: This revision supersedes and replaces the entire Willow Sub-basin Area Plan, <u>the two area management plans (Kashwitna and Deception Creek)</u> , and the affected portion of the Susitna Area Plan.
I	Planning Area (1-3)	The original southeastern part of the plan boundary should be reinstated so that DNR can develop the Knik River PUA Management Plan under the auspices of the Susitna Area Plan.	The SSAP does not now include the area that is mentioned. The area in question is part of the Susitna Area Plan (SAP).	No change.
Susitna Community Council	Planning Area (1-3)	The northern part of the planning area that is now managed under the SAP should be eliminated from inclusion in the SSAP. This area should be dealt with in the SAP.	The planning boundary of the SSAP was formed on the basis of common development patterns, the availability of access from the Parks Highway, and other regional planning aspects. The underlying intent of a plan revision is to include those areas within the planning area that possess common characteristics and that typically function as a unit or are affected by similar development trends. At the public meeting at the Susitna High School we noted that there were few parcels of state land remaining within the area north of the ‘Y’ and that it was likely that the revision of the SAP would begin within the near future, which would provide the basis for the review of state land use patterns within this area. In the event that this revision did not	No change.

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			commence, staff indicated their intent to undertake a plan amendment for this area within the next 12 months.	
I	Generally Allowed Uses (1-8)	Commenter is concerned that the plan does not regulate GAUs. Who defines such uses? Is it ok to damage critical environmental areas under the GAUs?	DNR, with some few exceptions related to Special Land Use Designations, does not regulate GAUs. These are controlled by 11 AAC 96. Specific controls are identified in this section of Administrative Code that provide protection to the environment. It is not ok under these regulations to damage critical environmental areas.	No change.
I	Planning Period (1-8)	The planning assumptions that are mentioned (generally) should be described.	Planning assumptions used in plan development are contained in Chapter 2, the region descriptions of Chapter 3, and management units in the same chapter.	No change.
I	Application of standards	Another common theme is the need to have specific, usually quantifiable, standards for the approval of authorizations rather than the more imprecise standards or measures, such as 'feasible and prudent', 'overall best interest of the state', and the like.	DNR typically uses the 'less precise' standards of approval in order to account for the various types of projects that are reviewed, the differences in impacts caused by varying activities, and the need to maintain flexibility in determining appropriate outcomes. Coupled with the inability to establish quantitative standards for most activities and state law [AS 38.05.035(e)] that establishes a qualitative standard for most authorizations involving disposals of state land (overall best interest of the state), DNR uses these less precise standards of approval in most of its decision making. This does not mean that decisions that result from such standards are wrong or inappropriate. The analysis process in DNR written decisions is thorough and is controlled by detailed internal procedures that require the consideration of a variety of factors in making adjudicatory decisions. All decisions are reviewed by	No change.

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			the Director of DMLW or, when authority is delegated, to Section Chiefs or Regional Managers.	
I	General	Recommends that the Palmer-Wasilla Region be dropped from this plan; it is also unclear why the Point Mackenzie area is not a separate region.	DNR wanted, to the extent practicable, to maintain a similar exterior boundary to that used in the original Willow Sub-Basin Area Plan. The inclusion of the Point MacKenzie area within the Palmer Wasilla region was a matter of judgment. It was thought appropriate to make it a subarea within the larger region Wasilla/Palmer region because it contained so little state land and therefore did not deserve the attention typically given a region in an area plan.	No change.
I	General	Request of extension of the comment period.	The original two month comment period was deemed sufficient to conduct a public review of this draft plan.	No change.
MSB	General	Wetland classifications and other aspects of wetlands management needs to be discussed as they were in the original 1982 plan.	At the time of the development of the initial plan in the late 1970s, neither state nor federal regulatory programs dealing with wetlands were well advanced. It was therefore appropriate for area plans prepared during that time to contain management guidelines for wetland management. Since then, extensive wetland management programs are in place and there is no longer the need to include wetland mitigation requirements in an area plan. These are already included in federal Section 208 program and Alaska Coastal Zone requirements. Other requirements exist pertaining to the protection of wetlands within the planning area and are included in local planning codes as well.	No change.
MSB	General	Major rail corridors, under consideration for development at this time, are not	Until a corridor can be definitively identified it would be imprudent to	No change.

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		discussed. Discussion of these proposals should be included in the plan as it will affect state lands and waters.	include consideration of alternative corridors. Alternative corridors are still under consideration and it will some time yet before the NEPA process is completed.	
I	Wording	A general theme expressed in comments is that too may 'weasel' words like 'should' or 'may' are used throughout the plan. This means that DNR may not accomplish what is intended and therefore that the goal or action will not be achieved or undertaken. Replace with the work 'shall' or 'will' since this will bind DNR to the action and therefore provide the appropriate measure of protection for the management guideline under consideration.	Area plans are meant to be general guides to subsequent DNR decision making. A plan of this type cannot predict the exact nature of the situation that will be confronted in an adjudicatory action and therefore discretion must be left to the adjudicator to tailor the approval (or denial) of an authorization to the exact circumstances that are in play. The plan is intended to establish the appropriate land use for adjudicatory decisions but to leave the exact stipulations that are to be imposed in the granting of an authorization to the adjudicator, considering the specific circumstances that surrounds the decision. DNR must follow the recommendations and management guidelines in area plan unless there are extenuating circumstances. In instances where it is necessary to vary from a plan's requirements, specific standards to guide this process are contained in the DMLW Division Policy File 06-01 and are to be followed by DNR adjudicators.	No change.

Chapter 2

Commenter	Subject (page)	Issue	Response	Recommendation
I	Goals (2-1)	Add the word 'diverse' to the goal dealing with Economic Development.	Concur.	Add word 'diverse': 'vital, self-sustaining, <u>and diverse</u> local economy.'
I	Goals (2-1)	The Economic Development goal is overly simplistic. It doesn't capture all of the nuances that are required in order to make determinations of whether particular forms of development are prudent.	Goals are attempts to describe desired end states. They are meant to be general.	No change.
I	Goals (2-1)	Goals are not listed in priority sequence. Without this, the relative value of the goals cannot be judged.	No attempt is made to prioritize goals since, to DNR, they are all desirable and represent appropriate ends to achieve in the management of state land and resources.	No change.
I	Goals (2-1)	The Public Health and Safety goal should not only focus on state land but also on the local community.	The focus of this goal is state lands; it is not intended to relate to communities.	No change.
I	Goals (2-1)	The goal related to Public Use needs to be broadened to include the ability to implement and manage activities on public land.	The balancing of public access with the protection of the environment is implicit; many aspects of Title 38 as well as other Titles contain measures to prevent the adverse effects of such use.	No change.
I	Goals (2-1)	The word 'minimize' in general guidelines (B)(1) is inappropriate. Use the word 'prevent' instead.	Partly Concur. Although we generally concur that the first approach to siting and development decisions is to avoid impact, there are instances where impacts cannot be avoided and the word 'minimize' is correct in this context.	Change to: <u>Avoid, and if not possible, minimize</u> damages to
Alaska Quiet Rights Coalition	Goals (2-1)	Recommends adding a statement that the state will "plan and manage" recreational activity.	Concur.	Change to: Provide, <u>plan</u> , enhance, and <u>manage</u> diverse opportunities for public use of state lands,
Talkeetna Community Council	Goals (2-1)	The Public Use goal should be expanded to include a guideline to plan and manage recreation to protect ecosystems and wildlife habitat, and to avoid user conflicts.	Generally concur, although this is better stated as an overall goal related to environmental quality as well as recreation.	Add: <u>Manage state land to protect ecosystems and wildlife habitat, and to avoid user conflicts.</u>

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Talkeetna Community Council	Goals (2-1)	The economic development goal needs to be expanded to recognize that uncut forests are an important part of the local economy.	While this may be a proper goal, it is somewhat too narrow for inclusion under the more general goals that are identified in this section of the plan.	No change.
I	Goals (2-2)	Include the word 'viewing' in the goal on 'quality of life'.	Concur.	Add: "Maintain or enhance the quality of the ...and harvest opportunities, <u>as well as opportunities to view wildlife and the natural environment, ...</u> "
Friends of Mat-Su	Goals (2-2)	Add agriculture and renewable energy resources to the goal dealing with sustained yield.	Partially concur. Subsurface energy resources are outside the scope of this plan, however.	Change: Maintain the long-term productivity and quality of renewable resources including fish and wildlife, <u>agriculture, timber, and above-ground renewable energy resources.</u>
I	Coordination (2-4)	The word 'Coordination' needs to be replaced with the word 'compliance'.	DNR coordinates with local government when it is appropriate to do so; however, there are instances where state interests may not coincide with local interests – that is, the overall best interest of the state is different than that of the local unit of government. Given this context, the use of the word 'compliance' is inappropriate.	No change.
Willow Community Council	Coordination (2-4)	This community council notes that they are in the process of developing their local plan and that DNR should adhere to the plan, once prepared.	The above answer generally applies in this instance, too: DNR, in its development of area plans, will review local plans and, where appropriate, may develop recommendations that are consistent with these plans. However, DNR may vary from the recommendations of local plans if, to achieve the overall best interest of the state, this is desirable or necessary.	No change.
Talkeetna Community Council	Coordination (2-4)	The plan should include a list of all towns and community councils.	The plan now includes all towns; they are described in the region descriptions. A listing of community councils is inappropriate for a 20 year plan since they are likely to change over this period of time.	No change.
MSB	Coordination (2-4)	The MSB recommends the inclusion of a statement that community comprehensive	Concur.	Add following to Management Guidelines: <u>Authority of State Plans.</u>

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		plans can make recommendations for state lands within their planning areas, but cannot establish requirements. Also, they recommend including a statement that state land use designations are decided on a regional basis through the state planning process and local plans do not supersede state plans for the use of state lands.		<p><u>State plans only affect state lands and federal lands that have been selected by the state for conveyance. They do not affect Borough, other state lands not affected by Title 38, other federal lands, or private lands.</u></p> <p><u>The MSB has developed and will continue to develop local comprehensive plans for specific parts of the Borough. These are intended to identify preferred land use patterns and development stipulations. DNR reviews these plans in the course of developing management plans or area plans, and often makes use of their recommendations. However, while community comprehensive plans can make recommendations for state lands within their planning areas, they cannot establish land use designations or other planning requirements for state land. State land use designations are decided on a regional basis through the state planning process and local plans do not supersede state plans for the use of state lands.</u></p>
RADS	Coordination	Add ‘timber sales’ to the list of authorizations that should review borough plans.	Concur.	Add ‘timber sales’ to list on p. 2-4, line 27.
I	Cultural Resources (2-5)	There should be no destruction of cultural sites.	This section of the plan identifies a number of processes that are to be used to identify cultural features prior to site disturbance. The purpose of these processes is to avoid destruction of significant cultural sites.	No change.
MSB	Cultural Resources (2-5)	Add a statement to contact certified local government sources (MSB Cultural Resources Specialist).	Concur.	Add B(3): <u>Consult with the certified local government sources (MSB Cultural Resources Specialist) where appropriate.</u>

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MSB	Cultural Resources (2-5)	Add a statement that requires the establishment of buffers (50' or greater) around significant cultural resources as part of the overall protection process when subdividing or otherwise using state lands.	Concur.	Add B(4): <u>Require the establishment of buffers (50' or greater) around significant cultural resources as part of the overall protection process when subdividing or otherwise using state lands.</u>
I	Cultural Resources (2-6)	Line 21 should be rephrased 'to prevent the destruction of cultural sites'.	Concur.	Revise ending of sentence ' <u>to prevent the destruction of cultural sites.</u> '
I	Fish and Wildlife (2-7)	The word 'Harvest' should be dropped from the titling of this section.	Although most state area plans deal with harvest in a significant way, it is correct that the term 'harvest' is somewhat inappropriate in the context of this plan.	Concur. Drop the word 'Harvest' from the titling of this section.
I	Fish and Wildlife (2-7)	The wording "to" which appears after "waters" should be changed to "and" so the sentence reads "... public lands and waters <u>and</u> promote ...". This comment refers to lines 6 and 7, p. 2-7.	Concur.	Change lines 6 and 7, p. 2-7, "... public lands and waters [to] <u>and</u> promote ...".
I	Fish and Wildlife (2-7)	In the goal 'Mitigate Habitat Loss' delete the word 'minimize'.	DNR evaluates projects in terms of their avoidance of critical areas but we also will minimize impacts through the use of stipulations.	No change.
I	Fish and Wildlife (2-7)	There is concern that the last sentence in Mitigation guideline (lines 33, 34) will create a loophole, allowing inappropriate projects.	DNR, in assessing the granting of an authorization, must consider the costs of a recommended action or stipulation as well as other relevant aspects.	No change.
Friends of Mat-Su	Fish and Wildlife (2-7)	Suggests using the term 'avoid' rather than 'mitigate' in the goal 'Mitigate Habitat Loss'.	The concept of avoidance is included in the management statement. The term 'mitigate' is a general term and appropriate for use in this context.	No change.
Friends of Mat-Su	Fish and Wildlife (2-7, 2-12)	Provide for a public review/comment period if there would be a degradation of a resource.	Authorizations that involve a disposal of a state interest go through a public process currently. Although not requiring a public review period, permits, which are of short term duration and revocable at will, are issued with stipulations that would mitigate or avoid habitat loss or impairment to fish and wildlife. DNR often makes these decisions available to the public for review (and possible	No change.

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			comment).	
Talkeetna Community Council	Fish and Wildlife (2-7)	The reference to the enforcement of stipulations should be augmented by the statement that all authorizations should be actively monitored.	The State has issued vast quantities of authorizations over the last 50 years. It is not possible to actively monitor all authorizations.	No change.
I	Fish and Wildlife (2-7)	The goal 'invasive species' needs to be modified. There needs to be evaluation of the effects of climate change; many of the supposed impacts may, in fact, be advantageous. Also, the plan needs to identify the techniques that are to be used in the control of invasive plant species.	The goal related to invasive species derives from Administrative Code, over which this plan has no control. The evaluation of the effects of climate change is outside the scope of this plan. It is outside the scope of this plan to identify specific techniques.	No change.
I	Fish and Wildlife (2-8)	Concern over the statement that when significant adverse impacts occur, the effect of the use or development will be 'minimized.' Suggests the use of an absolute level of unacceptable impact.	This statement occurs within the context of the mitigation guideline measures that DNR follows in project approval. This guideline is an expression of general intent and is meant to provide flexibility in decision making. The identification of absolute levels would have to be made for each possible project and at each level of operation of that project, and this is clearly not feasible.	No change.
I	Fish and Wildlife (2-8)	Concern over the use of the wording 'useful state' in the third mitigation guideline that is listed. This is not a useful phrase in terms of providing guidance to DNR in its decision making.	The term 'useful' is a term of art and is used to provide some flexibility. Not all development involves previously undisturbed land and there needs to be some management flexibility in determining the correct level of restoration or rehabilitation.	No change.
I	Fish and Wildlife (2-9)	Who initially questions whether a use is appropriate. ADFG should make the initial determination.	DNR makes the initial determination since it is the agency receiving and adjudicating an application.	No change.
I	Fish and Wildlife (2-10)	Believes that contracts should include language that forces contractor to deal with invasive species.	This issue is outside the scope of this plan.	No change.
I	Fish and Wildlife (2-12)	Under management guideline M, line 13, there should be the statement that 'or the	Concur.	Add the wording: <u>or the activity may be denied.</u>

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		activity may be denied’.		
I	Fish and Wildlife (2-12)	Authorizations should not be issued in anadromous stream mouths.	Disagree. Authorizations may be considered at these locations, although the standards for approval should be high, as stated in the plan (Management Guideline P).	No change.
RADS	Forestry (2-13)			
I	Forestry (2-13)	The goal that relates to the support of the timber industry is a mistake and inappropriate.	The support of the timber industry has remained a major state goal over many years.	No change.
I	Forestry (2-13)	Commenter suggests many other goals for forestry, many of which deal with sustained yield, meeting the FRPA, and consideration of the external costs (both economic and impact).	Many of the goals that are suggested are actually mandated through statute. Generally area plans do not repeat what is in statute. However, it would be appropriate to identify that section of Alaska Statute that enunciates the state’s forest harvest and management goals. These deal with many of the issues raised in public comments.	Concur in part. Add text to precede goals: <u>“The Alaska Forest Resources and Practices Act (AS 41.17.060) sets standards for management of all state forest land for sustained yield and multiple (AS 41.17.060(b) and (c)). AS 41.15.010-020 and .170(2) sets standards for forest protection from fire and other destructive agents. These standards, including those for forest economics, reforestation, fish and wildlife habitat, scenic quality, and other use apply statewide. In addition, the following goals apply specifically to the SESAP area.”</u>
RADS/I	Forestry (2-13)	The goal relating to Personal Use Timber should clarify that it is subject to funding and sustained yield considerations.	Add to this goal, line 18, the following: “... subject to limits of funding, staffing, and sustained yield.”	Add to the Personal Use Timber goal the following: “... <u>subject to limits of funding, staffing, and sustained yield.</u> ”
RADS/I	Forestry (2-13)	The Economic Opportunity goal ignores other industries, e.g., tourism, that depend on intact forests.	The SSAP provides for diverse forest uses by designating lands for various uses, and by allowing for multiple use within most designations, including forestry. However, one of the purposes for Forestry designations is to support local businesses that use wood and non-timber forest products.	No change.
I	Forestry (2-13)	Broaden the Wildland Fire Suppression goal beyond fire, and include life and	This is a major issue at present. HB370, which just finished its final hearing and we expect to pass this session, amends the	Partly concur. Amend this goal if HB 370 passes to reflect the goals in this legislation. If it doesn’t pass, delete goal

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		property in fire protection.	statutory language for wildland fire protection to cover all values, not just natural resources.	and simply reference the statutory language in the introduction to the forestry goals.
I	Forestry (2-13)	Too much land is allocated to forestry. No one in the Northern Community has supported logging.	The SSAP allocates land uses based on their resource characteristics and the general requirement described in Article VIII of the State Constitution that clearly establishes a presumption in favor of the development and utilization of state resources. Use allocations in the area plan coincide with their resource values, and areas designated Forestry are associated with this resource value. Other areas were not designated in this manner and reflect the presence of other resource values. DNR area plans are multiple use in character, providing for a diversity of uses, another requirement of Article VIII.	No change.
I	Forestry (2-13)	The introductory paragraph to this section on management guidelines is confusing and out of context, and doesn't reflect a public process.	Concur.	Revise to: <u>Active programs for forest management, including timber harvesting, and wildland fire management are appropriate within the planning area. The following section lists area-specific guidelines for forest management and wildland fire management. In addition to these guidelines, forest management activities are subject to the requirements of the Alaska Forest Resources and Practices Act, the Susitna Forestry Guidelines, the biennial Five-Year Schedule of Timber Sales for the Mat-Su Area, and any Forest Land Use Plan for a specific area. Opportunities for public comment are provided for each Five-Year Schedule and Forest Land Use Plan.. Fire management activities are subject to AS 41.15 and the Alaska Interagency Fire Management Plan.</u>

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I	Forestry (2-14)	The Susitna Forest Guidelines (SFG) are an excellent guide to the management of forest resources. They should be followed.	The requirement to follow the SFG is mentioned in management guideline A(2).	No change.
I	Forestry (2-14)	Recommends adding wording to 2 nd paragraph, page 2-14 that would require FLUPs to protect the current Winter trail system.	This section of the Forestry component deals with the statutory requirements that must be followed in a timber sale. As such it is inappropriate to add this statement. However, this component of analysis is provided for in the Resource Allocation Tables for each management unit. Recreational trails are to be considered and maintained within areas of timber harvest.	No change.
Friends of Mat-Su	Forestry (2-15)	Under ‘Personal Wood Harvest’ they question whether this program would be difficult to administer.	The program itself is not hard to administer, but it will require a reallocation of staff resources.	No change.
I	Forestry (2-15)	The conversion of land designated ‘Forestry’ to another use is inappropriate and should be prohibited.	Concur. It is the intent of this plan to retain in state ownership all land that is designated Forestry. But, as the commenter notes, there is no policy that precludes its conversion to another use.	Add new Management Unit ‘H’ on p. 2-15. <u>Maintenance of State Land Base.</u> <u>Land designated Forestry in this area plan is to be retained by the state and is not to be converted to another plan designation.</u> <u>If the latter is considered necessary, a public meeting is to accompany the plan amendment.</u> <u>Nonetheless, it is the policy of this plan that such conversions should not be considered until the plan is revised through a comprehensive plan revision process.</u>
Talkeetna Community Council	Forestry (2-15)	Add a management guideline that provides for coordination with the Borough’s forestry management.	Concur.	Add: <u>Coordination with Borough Forest Management Plans and Programs.</u> <u>Prior to the preparation of the Five Year Sales Schedule and the development of a FLUP, DNR should coordinate with the Borough’s forest management plan and program to obtain maximum efficiencies and avoid management conflicts over the harvesting of timber and with sensitive land uses.</u>

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I	Forestry (2-15)	Insert a new guideline that all logging roads be obliterated.	Some roads are intended for long-term forest access, while others are temporary and will be closed following harvest and reforestation. FLUPs will specify whether logging roads are intended to be permanent or temporary, and seasonal or year-round. Roads will either be maintained in a manner that will prevent erosion and protect water quality, or closed. Maintenance or closure will be done in accordance with the best management practices in the Forest Resources and Practices Regulations.	No change.
RADS/DOF	Forestry (2-15)	Management Guideline E identifies (only) Forestry as the land use designation to be used in the calculation of the sustained yield base and for subsequent sustained yield calculations. This is in error. The General Use designation may also be used, providing the management intent statement for a parcel provides for timber harvest.	Concur. Revise	Revise p. 2-15, lines 10 and 11, Management Guideline E. Revise to read: “The annual allowable cut is calculated using a <u>volume</u> control method Only areas designated ‘Forestry’ and <u>General Use (where the management intent statement for a parcel indicate that timber harvest is appropriate)</u> in this plan are to be included as part of the sustained <u>yield area</u> and in the sustained yield calculation for stands within the SSAP planning area.”
RADS	Forestry (2-15)	Substitute the words ‘prescribed burns’ for ‘management ignited fires’ in management guideline G, Fire Disturbance.	Concur.	Substitute the words ‘prescribed burns’ for ‘management ignited fires’ in management guideline G, Fire Disturbance.
I, Denali Log and Lumber	Forestry (General)	The forest resources need to be managed more actively. Much of the area designated Forestry contains trees that are damaged, diseased, or rotting. Delaying the removal of old growth trees will ultimately result in the development of blue joint grass.	DOF attempts to manage the forest resources of the state to achieve some of the objectives that are identified.	No change.
Denali Log and Lumber	Forestry (General)	The sustained yield and annual allowable cut calculation should be based on a shortened rotation and the harvest	The sustained yield calculation is made using guidelines in the Susitna Forestry Guidelines, which is not under	No change.

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		<p>schedule should be accelerated to convert as much land as possible to young growth.</p>	<p>consideration in this plan revision. Change in the harvest schedule in made though the Five Year Sale Schedule by DOF and is not governed by the area plan.</p>	
I	Forestry (General)	<p>No public input was permitted in the designation of the Kashwitna Uplands region as Forestry. Staff told me that the decision on this area had already been made.</p>	<p>The opportunity for public input was provided on the designations to be used on the Kashwitna Upland areas. Many comments have been received on this area and many have not been supportive of the Forestry designation. What staff described at the meeting is the importance of this area to the DOF overall timber supply program within the Susitna Valley and to the sustained yield calculations for this area. Because of this importance, staff indicated that there would have to be very good justification to change the designation – not that it couldn't occur.</p>	No change.
I	Forestry (General)	<p>A variety of issues were raised that dealt directly or indirectly with forestry, including the need to coordinate with ADOT, the destruction of the Willow-Fishhook Road, the scale of truck traffic on Borough roads, global warming, and carbon sequestration.</p>	<p>These issues are outside the scope of the area plan to answer. The focus of the area plan is designation and management guideline identification. Also, many of the issues that are raised are actually related to timber harvesting operations on non-state land, over which DNR has no control. With respect to the latter, specific guidelines are not considered necessary for the Kashwitna area given the breath of requirements that now exist, including FRPA, Susitna Forest Guidelines, and the requirement to prepare a FLUP before timber harvest can commence. However, RADS is aware of the need to coordinate with ADOT/PF and of some of the impacts that are described. These issues have been forwarded to DOF for</p>	No change.

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			consideration.	
I	Instream Flow (2-16)	Add the term 'ecosystem integrity'.	Concur.	Change to: Maintain water quantity and quality sufficient to protect <u>overall ecosystem integrity</u> and to protect the human, fish
I	Instream Flow (2-16)	Add Kashwitna, Sheep, and Montana to the list of streams for which instream flow reservations should be established.	Concur.	Add Kashwitna, Sheep, and Montana to the list of streams for which instream flow reservations should be established.
I	Material Sites (2-17)	Define appropriate sites for material extraction.	Material sites are identified in the plan; they are either designated 'Material' or gravel extraction is noted in the management intent statement.	No change.
I	Material Sites (2-17)	The goal for material sales is too broad and gives no consideration to the other factors that must be considered in making proper siting decisions on gravel extraction sites.	Concur.	Add as goal: <u>Avoidance or Minimization of Impacts.</u> <u>Material extraction operations are to be sited so that they avoid impacts to adjacent residential areas (noise, dust), environmental resources and sensitive habitats, and to fish and wildlife populations.</u>
Nature Conservancy	Material Sales (2-17)	FRPA requirements should apply to any gravel extraction activities along anadromous fish waters.	Concur.	Change Management Guideline E to: <u>A riparian buffer shall be provided adjacent to anadromous waterbodies, with the width being consistent with FRPA requirements. Generally, this will mean that a width of 150' will need to be provided for most anadromous streams. The adjudicator is to consult with</u>
Friends of Mat-Su	Material Sales (2-19, 2-20)	DNR should meet the requirements of the Borough's Gravel Pit ordinance, consider increasing the buffer to 200', and should comply with the Borough's ordinance.	A management guideline currently exists requiring DNR to coordinate with the Borough prior to issuing a material sale. The current wording provides the ability to increase the width of the buffer strip if necessary.	No change.
Alaska Quiet Rights Coalition	Recreation (2-19)	Recommends adding another bullet point to the list: "protecting wildlife and non-motorized recreation from the noise and habitat destruction of motorized use."	This listing constitutes an enumeration of how recreational opportunities shall be realized. As such, these changes are inappropriate. This group also believes that DNR should	Add: Management Guideline G. <u>Protection of Resources.</u> <u>DNR, in its consideration of resources and in the management of state land, shall consider the impacts of such use upon fish and</u>

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			<p>take a more active role in managing recreational activities. While this is desirable, staffing and statutory authorities limit the amount of management that can be effectively provided by DNR.</p> <p>However, the premise that the provision of recreational opportunities must consider other aspects is valid. Add a management guideline that deals with the impact of recreational facilities upon other uses and values.</p>	<p><u>wildlife, habitat and soil degradation, and upon other forms of use that may occupy the area that is under consideration in the authorization. Uses that are not compatible with these uses and resources are to be made compatible through the use of stipulations. The ability of the Department to manage the subsequent activities that may result from the issuance of an authorization is to be taken into consideration in the adjudication of an application that requires a written determination by DNR.</u></p>
Talkeetna Community Council	Recreation (2-19)	Recommends adding additional goals related to recreation.	Concur.	<p>Add the following to the list of objectives to be realized:</p> <ul style="list-style-type: none"> • <u>Managing recreation to minimize user conflict, provide for a quality experience for all user groups, and protect the natural values and attributes of the area within which the recreation occurs.</u> • <u>Protecting ecosystems and habitat from damage caused by inappropriate recreation use.</u>
I	Recreation (2-20)	Questions the inclusion of the term airstrip development as an aspect of a public use site. Wants to develop a permitting process.	It is not unusual for public use sites to include an airstrip. The decision as to whether to include it is made in the context of the development of the public use site and in many instances such sites would be developed to contain an airstrip. This is particularly true within remote recreational areas. The development of permitting standards for airstrips is outside the scope of this plan.	No change.
I	Recreation (2-20)	The plan should not have the authority to establish recreation facilities on state land.	This authority is provided for in state law.	No change.
Friends of Mat-Su/I	Recreation (2-20)	Provide for public comment/review for activities involving sales, leases, .073	DNR currently provides for the opportunity of public review/comment for	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
		process, and the like.	the activities that are noted. This usually occurs in the form of a Preliminary Decision that is made available for public review.	
I	Recreation (2-21)	ADFG should be given the authority to approve a .073 project. As it is written ADNR would seem to be the only agency that approves projects of this type.	Approval of this type of project is vested with DNR under state statute.	No change.
Talkeetna Community Council	Recreation (2-21)	Recommends adding management guidelines for the management of motorized recreation and to require consultation with ADFG.	Partly concur.	Add the following: Consultation with ADFG. <u>Consult with ADFG in the siting of facilities where impacts may occur to fish and wildlife species or to important habitats.</u>
Friends of Mat-Su	Recreation (2-21)	There should be strict standards for the authorization of uses adjacent to recreation facilities.	DNR currently has a review process in place to deal with the authorization of uses next to recreational facilities.	No change.
I/RADS	Recreation (General)	A description of the role and importance of recreation within the planning area is not provided. A description of recreation would be helpful in understanding the importance of keeping areas open to recreation and the importance of retaining local and regional trails, including the Iditarod.	Concur.	Add: A factual description of recreation within the planning area, this description to precede goals.
I	Recreation (General)	A general theme in the public comments is the need for DNR to manage its lands in a more aggressive manner than it is now doing. A corollary to this is that state land should not be opened to recreation use unless there are adequate monies and staff to monitor and enforce compliance with state law and regulations.	It would be wonderful if adequate funds and personnel were provided to DNR to manage state land. The reality, however, is different than this. There are relatively few staff to manage state land within the planning area. But these are not the only considerations. State law, both in its presence and absence, limit adequate enforcement. Under 11 AAC 96 all state land is open to the public for the vast majority of uses that the public typically engages in. In addition, AS 380.04.200 prevents DNR from managing these uses on an 'experiential' basis. These problems are	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
			<p>compounded by the absence of citation authority and the inability to enforce effective compliance since this can only occur through civil action, and compliance actions of this type are of low priority to the Attorney General’s Office.</p>	
<p>Alaska Center for Environment</p>	<p>Recreation (General)</p>	<p>This entity, similar to many other individual and organizational commenters, is greatly disturbed about the impacts produced by ATV use on state land. The SSAP should address this issue.</p>	<p>This issue is beyond the scope of the SSAP to address. Such uses are authorized under the Generally Allowed Uses (11 AAC 96). Amendment of these regulations would be required to implement more stringent controls of ATV use. Equally important, for any program like this to be effective, the department must possess enforcement authority. Currently the only method to enforce compliance is through costly court actions, which are of low priority to the Attorney General’s Office.</p>	<p>No change.</p>
<p>Talkeetna Community Council</p>	<p>Settlement (2-22)</p>	<p>Land should be set aside for a new town between Willow and the ‘Y’.</p>	<p>Until a site is more evident, the reservation of state land for this purpose at this time is premature. In the event that such an idea becomes more feasible, it is possible to acquire state land for specific purposes under a Public and Charitable section of Title 38.</p>	<p>No change.</p>
<p>MSB</p>	<p>Settlement (2-22)</p>	<p>The MSB recommends the inclusion of a statement that community comprehensive plans can make recommendations for state lands within their planning areas, but cannot establish requirements. Also include a statement that state land use designations are decided on a regional basis through the state planning process and local plans do not supersede state plans for the use of state lands.</p>	<p>Concur.</p>	<p>Add following to Background section: <u>The MSB has developed and will continue to develop local comprehensive plans for specific parts of the Borough. These are intended to identify preferred land use patterns and development stipulations. DNR reviews these plans in the course of developing management plans or area plans, and often makes use of their recommendations. However, while community comprehensive plans can make recommendations for state lands within their planning areas, they</u></p>

Commenter	Subject (page)	Issue	Response	Recommendation
				<u>cannot establish land use designations or other planning requirements for state land. State land use designations are decided on a regional basis through the state planning process and local plans do not supersede state plans for the use of state lands.</u>
I	Settlement (2-22)	There is objection to the phrase ‘or moderate unreasonably high prices’ in the management guideline dealing with Competition.	Although the intent of the land disposal program is not to compete with the private sector or other governmental entities, there have been occasions when the simple availability of state land for potential disposal has been a factor in moderating some housing markets.	No change.
MSB	Settlement (2-23 – 2-24)	Recommends including a statement that the state continue to coordinate with the MSB on the identification and dedication of trailheads and trail easements that provide access to remote/recreational parcels off the road system.	Concur.	Add management guideline A(6): <u>Ensure Access to Remote Settlements.</u> <u>The state should continue to coordinate with the MSB on the identification and dedication of trailheads and trail easements that provide access to remote/recreational parcels off the road system. As part of the development of remote settlement areas, DNR should consider the provision of staging areas, parking areas, and/or trailheads in order to accommodate landowners parking vehicles and other equipment while accessing their remote parcels.</u>
I	Settlement (2-23)	Include, under Settlement, an overarching goal that stipulates market neutrality. Additional development is not appropriate until there is a demand for additional residential subdivisions.	The concept of ‘market neutrality’ is not known. However, the thrust of this comment is to not provide an oversupply of residential land at any one time. The management guideline ‘Pacing’ (p. 2-24) treats the question in this comment.	No change.
I	Settlement (2-23)	Add a requirement that DNR must consult with ADFG in any remote staking program or state subdivision.	Not required. ADFG is already part of the agency review process for each type of land disposal.	No change.
Friends of Mat-Su	Settlement (2-23)	Ensure that the public has the opportunity to comment on subdivision sales and	DNR provides the opportunity to comment on forthcoming settlement	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
		ensure that ‘green’ infrastructure principles are considered.	projects. DNR may consider the use of the ‘green’ planning principles in its design of subdivisions.	
MSB	Settlement (2-23)	Settlement on state lands will impact surrounding areas. Consideration should be given to the availability of public facilities and services.	Management guidelines and goals in the Settlement section already require such consideration.	No change.
I	Settlement (2-24)	The management guideline that deals with ‘pacing’ implies that the state must develop and apply a methodology for assessing market demand. This guideline should highlight the need for a market assessment methodology.	This guideline is meant to express the position that land disposals will occur throughout the 20-year planning period, with the actual offering dependent on a number of factors. While a market assessment usually accompanies a disposal decision, many other factors enter into it as well.	No change.
I	Settlement (2-26)	<p>The plan needs to make clear whether timber harvest within areas other than Forestry are counted in the sustained yield calculations of the state.</p> <p>There is also the concern that settlement can occur in areas that are designated in other categories than Settlement.</p>	<p>This restriction already exists in the plan (p. 2-15). See RADS comment above on Forestry (2-15) affecting Management Guideline E</p> <p>DNR is precluded from offering lands for disposal in designations other than Settlement. Although the possibility exists that other land could be converted to Settlement, this is exceedingly unlikely. All of the designations that are used in the plan, other than General Use, are intended for a specific purpose and are described in that way. See also a following recommendation for the inclusion of a management guideline that deals with the conversion of land use designations.</p>	<p>No change.</p> <p>No change.</p>
Talkeetna Community Council	Settlement (2-27)	The state should follow all Borough regulations as they pertain to subdivision development.	As a matter of practice, DNR has been following Borough platting requirements.	No change.
Talkeetna Community Council	Settlement (2-27)	All state subdivisions should be sited where road access is available and a	Generally, state subdivisions are located where access is available or is likely to be	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
		certain amount of area should be set aside for open space.	available. The amount of open space that is appropriate within a subdivision is a matter of the specific context within which a subdivision is designed. Specification of a certain amount of open space is not appropriate; development guidelines in the area plan provide, however, for the allocation of open space where necessary and appropriate.	
I	Settlement (General)	There is already enough land available for settlement in the Susitna Valley. The state land that remains within the planning area should be retained for other purposes.	The state is required under standards imposed by the Legislature to provide a certain amount of state land for settlement purposes. DNR has evaluated the remaining inventory of state land and has found that few favorable sites remain throughout the state. Accordingly, the value of the remaining areas in the Susitna Valley that are appropriate and suitable for settlement increases proportionately. It is not anticipated that the state will dispose of large quantities of state land for settlement during the planning period. The amount that is provided will be a function of demand, the availability of infrastructure, and costs. If the market for residential property is low, it is unlikely that the state would be imprudent enough to put land on the market that could not be used.	No change.
RADS	Settlement (General)	Over the last 15 years there has been a steady and serious decline in the amount of land available for settlement throughout the state and within this planning area. This has resulted from a variety of factors, the most important being the conveyance of state land to the Mental Health Trust (1 million acres statewide), University (250,000 acres	Because of this steady drain on state land resources, and particularly that related to settlement, a management guideline is needed to emphasize that land in the Settlement designation is intended for state land disposals and is to be retained for that purpose.	Add a new management guideline. <u>F. Maintenance of State Land Base.</u> <u>Areas designated Settlement in the area plan are intended to be used to provide a land base for DNR's long term land disposal program. This land is not to be converted to other classifications. Departures from this standard will require a plan amendment and a public meeting.</u>

Commenter	Subject (page)	Issue	Response	Recommendation
		statewide), and Mat-Su Borough (360,000 acres).		
I	Shorelands and Stream Corridors (2-28)	In the last sentence of management guideline B replace the last 'or' with 'and' so that the sentence reads 'protection of the habitat and wildlife.'	Concur.	Replace the last 'or' with 'and' so that the sentence reads 'protection of the habitat and wildlife.'
I	Shorelands and Stream Corridors (2-29)	The plan states that higher priority will be given to the protection of stream corridors than on providing land for private ownership along stream corridors. Why? Also, stream protection devices focusing on setbacks don't really work.	This first statement is correct; DNR does evaluate the need to retain land adjacent to streams as against providing it to a private entity. However, this design principle is balanced with the specific protection areas requirements in Table 2-1, which provides a variety of protection areas adjacent to streams, lakes, wetlands, and other sensitive features. These requirements are imposed when state land is conveyed out of state ownership. The protection of the critical resource is provided for through these measures, although they do not retain the land per se in state ownership. DNR has found that stream setbacks do work. The state is not unlike other governmental entities that impose setbacks, and these are imposed because the governmental unit does not want to retain a small amount of isolated public land.	No change.
I	Shorelands and Stream Corridors (2-29)	Management guideline D should be edited to indicate that all waterbodies are of high value.	Not all waterbodies are of the same value, and this guideline is intended to give guidance to DNR on those that are considered to have particular importance.	No change.
I	Shorelands and Stream Corridors (2-30)	The retention of land along lakes is a good idea but unworkable -- the land that is being retained is usually not useful for the intended purpose and is usually "swamp".	DNR has imposed the requirement for public use sites for the last 25 years throughout the state and has found the technique worthwhile.	No change.
Friends of Mat-Su	Shorelands and Stream Corridors	Increase the stream setback to 200' and the buffer width to 75'.	Partly concur. Increase the width of the protection area referenced in the plan to	Partly concur. Increase the width of the protection areas and other references to

Commenter	Subject (page)	Issue	Response	Recommendation
	(2-31)		150', to coincide with FRPA requirements. Buffers perform a function that is in addition to that of the protection area; they typically increase the area of protection from, in this case, 150' to 200' in many cases.	protection requirements from 100' where it is now mentioned in the plan to 150'. The intention is for DNR to adhere to FRPA requirements. Note: because of the way FRPA requirements are developed there may be instances where 150' is not correct; in these instances, the protection area will coincide with FRPA requirements but shall not be less than the width now specified in the plan. Note: This change is intended to affect all references to widths associated with protection areas (or similar areas of this type) throughout this plan. These references will change accordingly.
MSB	Shorelands and Stream Corridors (2-33 - 2-34)	The buffers in the Fish Creek Management Plan are different than those in the SSAP. All buffer distances should be standard so that the public is not confused.	Since the primary plan throughout the planning area is the SSAP, and the Fish Creek plan is simply a subset management plan, the latter should conform to the SSAP. However, DNR has agreed to use somewhat different standards in the Fish Creek area, to reflect the results of this specific planning process.	No change.
MSB	Shorelands and Stream Corridors (2-33 - 2-34)	The guidelines for buffers do not indicate the restrictions for structures. MSB is currently developing amendments to their setback ordinance within buffers to prevent damage to riparian areas. Buffer language should be more specific as to what is allowed or not.	Requirements for structure avoidance within riparian buffers are identified in Table 2-1. DNR is in the process of developing more specific standards for structure and use restrictions in riparian areas. These will be included in state Administrative Code but are not yet available. When available, they will supersede the requirements in Table 2-1.	No change.
MSB	Shorelands and Stream Corridors (2-33 - 2-34)	Building setbacks should be 75' on all waterbodies in keeping with the MSB code and Coastal Management Plan.	Table 2-1 specifies a minimum setback of 75'.	No change.
I	Subsurface	The goal related to opportunities for	This is an overall goal and as such gives a	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
	Resources (2-35)	mineral development and development is too open ended. Development regardless of cost is 'not what we want'.	general orientation for state development policy. The issues of costs and benefits are addressed at length during the regulatory review and permitting processes.	
Friends of Mat-Su	Subsurface Resources (2-35)	Specific criteria should be applied to protect resources when granting permits for mineral exploration.	The authorization of mining on state land is controlled by both statute and regulations. These contain a variety of development standards and design requirements.	No change.
Friends of Mat-Su	Subsurface Resources (2-36)	Suggests the inclusion of a statement explaining that less than 50% of anadromous streams are contained in the ADFG Catalogue of Anadromous Waters	Concur.	Under D, 'Mining in Fish Habitat' add the following within the paragraph: <u>Not all anadromous streams are listed within the ADFG Catalogue of Anadromous Waters; accordingly, DNR should consult with ADFG prior to the issuance of an authorization where stream channels are present.</u>
I	Subsurface Resources (2-36)	The effects of mining should be protected in all waters, not just those involving anadromous waterbodies or those bodies where fish are present.	As a matter of course, DNR reviews the discharge of waste material as part of a mining operations plan during the permitting/regulatory process. Other waters are therefore considered.	No change.
I	Subsurface Resources (2-36)	There are many areas where mining could occur and these have not been closed to mineral entry. Just because many areas are of low mineral potential does not mean that they shouldn't be closed.	The current standards for mineral closure are different than those that existed in the development of the 1982 plan. The standards are contained in AS 38.05.185 and unless those standards are met, a mineral closure cannot be imposed. Two aspects are important here: first there must be a mineral potential and, second, there must be a reasonable certainty between surface and subsurface uses. These aspects have not/cannot be established within this planning area.	No change.
I	Subsurface Resources (2-37)	There are many areas where oil and gas development would not be appropriate. They should be identified.	Oil and gas resources are not dealt with in an area plan. Separate planning processes exist for these resources and are controlling.	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
Friends of Mat-Su	Public Access (2-38)	Consider the possibility of designating some remote staking areas as non-motorized trail access only.	Access is evaluated at length in authorizations involving remote staking areas. Non-motorized access is part of that assessment in certain instances.	No change.
Mat-Su Trails Council	Public Access (2-38)	The state should actively improve access.	The word 'enhance' is considered to be similar to 'actively improved.'	No change.
Mat-Su Trails Council	Public Access (2-38)	The state should require that all trails be surveyed and recorded.	It is not necessary that all trails be surveyed and recorded. However, the state agrees that it is important to identify (GPS) and record the more important ones and is engaged in a project with the Borough to accomplish this.	No change.
Mat-Su Trails Council	Public Access (2-38)	Under management guideline E, this section should be revised to make it clear that the development of new trails should not displace existing methods of access.	Concur.	Add: <u>The development of new trails should not displace current methods of access without providing alternative routes.</u>
Alaska Extreme Four Wheelers	Public Access (2-38)	No mention is made of the use of trails by highway vehicles and non-street legal vehicles.	This section (Management Guideline B) explains general state policy on retaining RS 2477 rights of way. Specific sections of Administrative Code deal with the types of uses that may be appropriate on state land. The latter governs. The identification of vehicles that may be appropriate for use within easements is outside the scope of the area plan and more appropriately addressed through regulations. DNR is in the process of developing such regulations and, once adopted, these will provide the predictability that the commenter thought appropriate.	No change.
Alaska Extreme Four Wheelers	Public Access (2-39)	Standards should be provided for limiting access. The public should be involved in their development.	This management guideline (F) is meant to express overall state policy on limiting public access. Decisions on limiting access are very much site specific type decisions and occur on a case-by-case basis. Specification of standards is beyond the scope of this plan in any event	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
			and, if developed, would be the subject of revisions to the Administrative Code. The public would have the ability to review and comment on draft regulations.	
I	Public Access (2-39)	Under goals, 'Public Access', the plan should provide for the option of designating some remote staking areas as non-motorized trail access only.	SSAP does not constrain the land disposal program from providing access in this manner; in fact, most access is in this form. However, AS 38.04.200 constrains DNR from closing an area to motorized use if a popular pattern of use has developed over time.	No change.
I	Public Access (2-39)	Under the management guideline dealing with temporary roads, these should always be obliterated when they are no longer needed for their original purpose.	Generally agree, although some discretion must be maintained.	Add: <u>Temporary roads should be obliterated when no longer needed for their original purpose.</u>
Talkeetna Community Council	Public Access (2-39)	Recommends adding a management guideline that deals with the protection of the environment.	Generally concur.	Add to p. 2-41: <u>H. Protection of the Environment.</u> <u>In the siting of public access facilities, consideration is to be given to the effect of the proposed project or improvement on the natural environment, fish and wildlife species, and habitats identified in a management plan or area plan as significant. Consult with ADFG where appropriate.</u>
Mat Su Trails Council	Public Access (2-39)	The plan seems to imply that local trails are available for local use only.	This is not correct. All trails are open to public use. This section of the plan focuses on when and under what conditions to provide local trails.	No change.
Mat Su Trails Council	Public Access (2-40)	Under trail rerouting, the wording should be changed from 'should' to 'shall' and add language that rerouted trails should be constructed as 'sustainable' trails.	The use of the word 'should' is to be retained in order to provide flexibility for specific conditions. The standards for trails are contained in 11 AAC 51 and DNR defers to these for specific guidance. They do not preclude the development of 'sustainable' trails and as DNR becomes more familiar with this approach and more specific standards for sustainable trails are developed, trails	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
			may be developed in this manner.	
MSB	Public Access (2-41)	Trails should be aligned at 90 degrees to existing roads.	Management guideline F already requires this.	No change.
Mat Su Trails Council	Public Access (General)	The plan fails to reference or describe the importance of the Borough Trails Plan and it does not acknowledge the snowmachining as the predominate winter recreation activity in the Borough.	Concur. The plan will be revised to include reference to both.	Add Management Guideline H. Coordination with Borough Recreational Trails Plan. <u>DNR, in its review of authorizations, material sales, timber harvests, and land disposals, shall review the Recreational Trails Plan. Provision is to be made for the recreational trails identified in this plan.</u>

Chapter 3

Commenter	Subject (page)	Issue	Response	Recommendation
I	Primary Designated Use (3-2, 3-5)	Disagrees with the statement that “all other uses are compatible with the primary use.”	This statement is derived from Alaska regulation (11 AAC 55.040).	No change.
I	Forestry designation (3-2, 3-5)	Land that is classified Forestry must remain in that status for the duration of the forestry program.	Generally concur. Although the area plan intends that this occur, it cannot bind the actions of future Commissioners. It can, however, require that a plan amendment occur in order to ensure that land within the Forestry designation is likely to remain in state ownership. Also, although the plan assumes that timber harvest will only occur in areas designated Forestry or General Use, or as part of a forest management action or in preparation for settlement, this is not actually stated. Adding a management guideline to clarify these intentions is probably prudent. This guideline would be included in the Forestry section of Chapter 2.	Add: <u>H. Areas Appropriate for Timber Harvest. Systematic programs of timber harvest are intended to (only) occur within areas that are designated Forestry, General Use (where the management intent authorizes such a use), within areas designated Settlement or Agriculture where timber harvest is supportive of settlement and agriculture, or for purposes of forest management (like forest health and wildfire management). It is not intended that areas designated Forestry are to be redesignated for other purposes or that areas designated something other than Forestry are appropriate for re-designation to the Forestry designation. Changes of the types mentioned above will require a public hearing and public review process through a plan amendment.</u>
RADS	Forestry designation (3-5)	Include reference to Five Year Sale Schedule, FLUPS, and the SFG in the definition of Forestry.	Concur.	Insert on line 27: <u>the Forest Resources Practices Act, statutory requirements for Five-Year Schedules of Timber Sales and Forest Land Use Plans, the Susitna Forestry Guidelines, and the specific”</u>
I	Water Resources Designation (3-7)	Stronger language should be included in the description of this designation. In the last sentence of this description insert “the integrity of” between “if” and “wetland”, so the sentence reads “... appropriate design if the integrity of wetland and water ...” Also, after	Concur.	Revise: In the last sentence of this description insert “the integrity of” between “if” and “wetland”, so the sentence reads “... appropriate design if the integrity of wetland and water ...” Also, after “maintained” in the same sentence, insert “essentially intact”, so

Commenter	Subject (page)	Issue	Response	Recommendation
		<p>“maintained” in the same sentence, insert “essentially intact”, so sentence reads “... can be maintained essentially intact.”</p>		<p>sentence reads “ ... can be maintained essentially intact.”</p>
PALMER-WASILLA REGION				
I	Unit P-01	<p>This area is important for recreational use. It should be retained by the state for use by valley residents.</p>	<p>This unit is designated Habitat and is to be retained in state ownership.</p>	<p>No change.</p>
I	Unit P-02	<p>This area is important for recreational use. It should be retained by the state for use by valley residents.</p>	<p>This unit is currently designated Forestry and has been classified for this purpose for over 25 years. It is important to the state’s timber harvest program, especially since it is included in the DOF sustained yield area calculations for the Susitna Valley. However, the management intent for this unit does not mention the importance of this parcel for recreation. Recreation use needs to be considered in any FLUP that is prepared.</p>	<p>Add to management intent statement: <u>“Recreation use of this unit is to be considered in a FLUP prepared by DOF. Significant trails are to be protected and recreational activity is to be accommodated in timber harvest design.”</u></p>
Friends of Mat-Su	Unit P-03	<p>Change to Public Facilities-Retain (for green infrastructure).</p>	<p>Further review of this unit indicates that it is inappropriate for settlement; it is too remote and access is not likely for a very long period of time. It should be designated Forestry. Review of DOF information indicates that this area, which adjoins areas designated Forestry, is also included with the sustained yield area for the Susitna Valley and therefore is significant from this aspect, although no timber harvests are imminent in this area for the same reason – the lack of access. This unit provides access to the Forest Management Area in unit P-03, which would otherwise be inaccessible. The stands in both P-02 and P-03 are continuous, and unit P-03 area is positioned in the middle of the Houston</p>	<p>Change from Settlement to Forestry.</p>

Commenter	Subject (page)	Issue	Response	Recommendation
			Forestry Block.	
Friends of Mat-Su	Unit P-04	Change to Public Facilities-Retain (for green infrastructure).	This unit adjoins residential subdivisions and has good access. The Settlement designation remains appropriate.	No change.
Friends of Mat-Su	Unit P-06	Change to Public Facilities-Retain (for green infrastructure).	Unit is in the process of being developed as a state residential subdivision. The Settlement designation remains appropriate.	No change.
I/RADS	Unit P-10	The area east of P-10 that is depicted as Borough land is, in fact, state land and this area should be added to P-10.	Concur.	Revise boundary to include within this unit the area east of P-10 that is now depicted as Borough.
AK for Palmer Hay Flats	Unit P-13	This unit should be redesignated Habitat, similar to P-10 and P-15, which adjoin the Palmer Hay Flats.	This unit is upland from the Palmer Hay Flats and occupies an area that is appropriate for settlement. This area has existing, adjoining settlement and has direct road access. While it is true that there are areas of streams and wetlands, the protection of these areas are dealt with in the management intent for the unit. There is a 150' protection area adjacent to the stream and lakes and wetlands will be protected in subdivision design. Note: Other state lands adjacent to the Palmer Hay Flats (P-10 and P-15) are intended to be managed in a manner comparable to that in the Hay Flats proper. These directly adjoin the Flats.	No change.
Friends of Mat-Su	Unit P-14	Change to Public Facilities-Retain (for green infrastructure).	This unit is under an ILMA to ADOT/PF for a gravel site.	No change.
Friends of Mat-Su	Unit P-15	Change to Public Facilities-Retain (for green infrastructure).	This unit is already designated Public Facilities-Retain.	No change.
RADS	Unit P-15	Include the area north of P-15 that is depicted as Borough land. This land is now state land and it is appropriate to include it within P-15.	Concur.	Revise: Expand the northern boundary of P-15 to include the area that is depicted as Borough land on the plan map.
KASHWITNA-WILLOW UPLANDS REGION				
MSB/RADS	Management	The SSAP supersedes the Deception	Concur.	Under Management Summary, p. 3-25

Commenter	Subject (page)	Issue	Response	Recommendation
	Summary (3-24)	Creek Management Plan but no mention is made of this. To avoid misunderstandings in the future, this should be stated.		and 3-53, add at end of paragraph the following: “The SSAP supersedes the Deception Creek Management Plan. The latter functioned as a management plan for the Deception Creek area east of Willow and south of the Hatcher Pass Road. It was adopted in 1989 as a component of the Willow Sub-basin Area Plan.”
I	Unit U-01	This area should be managed for habitat and recreational uses also. This parcel should have unique designations, to reflect the varying character of the resources and their distribution. Existing trail corridors should be identified and protected.	This unit is designated Forestry. Under this designation, as with all designations, state land is to be managed for multiple uses. These uses and resources are mentioned in ‘resources’ and specific management requirements are given in ‘management intent.’ Recreation and habitat are both mentioned as important activities and attributes. When the overall management intent for a unit of geographic space is the same, RADS does not divide the unit into a series of subunits, but tries to manage the unit in a comprehensive manner. This is the case for parcel U-01. However, we are aware that other resources exist and must be provided for, as described above. Trail corridors are identified and are to be protected.	No change.
I	Unit U-02	This parcel is far too large for settlement at this time.	The plan identifies general areas for settlement in order to provide flexibility in subsequent subdivision design. Because of the location of this unit and because of the presence of sensitive areas within it, it is exceedingly unlikely that the entirety of this parcel will be developed. It is also unlikely that this unit and U-04 will be developed in the foreseeable future, and this is addressed by the need to deal with the suitability of	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
		<p>There is more than sufficient land for development.</p>	<p>development in both parcels. It is typical practice in both DNR plans and local comprehensive plans to allocate somewhat more land than is expected to be needed within a given planning period. This is done, as an industry practice, so that there will be sufficient land available if demand projections misestimate and are low, and to ensure adequate supplies of land beyond the immediate planning period.</p>	
I	Unit U-04	<p>This parcel is far too large for settlement at this time.</p> <p>There is more than sufficient land for development.</p>	<p>The plan identifies general areas for settlement in order to provide flexibility in subsequent subdivision design. Because of the location of this unit and because of the presence of sensitive areas within it, it is exceedingly unlikely that the entirety of this parcel will be developed. It is unlikely that this parcel and U-02 will be developed in the foreseeable future and the suitability of development will need to be addressed prior to development.</p> <p>It is typical practice in both DNR plans and local comprehensive plans to allocate somewhat more land than is expected to be needed within a given planning period. This is done, as an industry practice, so that there will be sufficient land available if demand projections misestimate and are low, and to ensure adequate supplies of land beyond the immediate planning period.</p>	<p>Change management intent from ‘is considered appropriate for residential development’ to ‘<u>may be</u> appropriate for residential development.’</p>
I	Unit U-08	<p>This parcel is far too large for settlement at this time. Careful consideration should be given to the protection of sensitive areas.</p>	<p>The plan identifies general areas for settlement in order to provide flexibility in subsequent subdivision design. Because of the location of this unit and because of the presence of sensitive areas within it, it is exceedingly unlikely that</p>	<p>No change.</p>

Commenter	Subject (page)	Issue	Response	Recommendation
			the entirety of this parcel will be developed. The need to protect sensitive areas is identified in management intent.	
I	Unit U-12	This parcel is far too large for settlement at this time.	The plan identifies general areas for settlement in order to provide flexibility in subsequent subdivision design. Because of the location of this unit and because of the presence of sensitive areas within it, it is exceedingly unlikely that the entirety of this parcel will be developed.	No change.
I	Unit U-12	This parcel, and U-23, should be retained in their current designations of wildlife habitat/watershed and used for that and remote recreation. This intent is even more valid today. According to the Deception Creek Management Plan, the semi-remoteness and semi-wild rugged character of this unit is appropriate for dispersed recreation activities. Further, this area is generally hilly with steep slopes. Most valleys and side slopes are boggy.	Although this parcel may have been somewhat remote at the time of the development of the Deception Creek Management Plan, development has occurred subsequently along the Willow-Fishhook Road and residential structures are now fairly close to this unit. Because of the change in development patterns along this road, the character of this unit has been affected. While this area does contain wetlands, which must be protected in development, there are areas of uplands having heavy vegetation and some of these areas occur next to lakes. Lakes are an extremely attractive feature in residential development and therefore this, combined with fairly ready access, makes this unit desirable and appropriate for development. The management intent for this unit identifies wetlands as a sensitive feature that needs to be protected in subdivision design and establishes a 50' protection area adjacent to lakes.	No change.
I	Unit U-16	This parcel is identified for public recreation but includes gravel extraction as a recognized use. This use is inconsistent with the overall management	Concur.	Delete reference to gravel extraction in the management intent statement.

Commenter	Subject (page)	Issue	Response	Recommendation
		intent for this unit and should be deleted.		
I	Unit U-23	This parcel is far too large for settlement at this time. Careful consideration should be given to the protection of sensitive areas.	The plan identifies general areas for settlement in order to provide flexibility in subsequent subdivision design. Because of the location of this unit and because of the presence of sensitive areas within it, it is exceedingly unlikely that the entirety of this parcel will be developed.	No change.
I	Unit U-23	This parcel, and U-12, should be retained in their current designations of wildlife habitat/watershed and used for that and remote recreation. This intent is even more valid today. According to the Deception Creek Management Plan, the semi-remoteness and semi-wild rugged character of this unit is appropriate for dispersed recreation activities. Further, this area is generally hilly with steep slopes. Most valleys and side slopes are boggy.	This large parcel does not have the characteristics that are ascribed to it in the original Deception Creek plan. The unit is generally well drained, is heavily vegetated, and access is available from the north. There is some slope to the parcel but this is not necessarily a detriment to residential development since current design techniques integrate slope into structure siting. Residential development has occurred to the north of the unit along the Willow-Hatcher Pass Road and access to this unit can be readily developed from the north through unit U-08. The management intent of this parcel includes requirements to develop this parcel under an integrated management plan that will be reviewed by the public. Management intent also includes requirements for the maintenance of moose wintering areas and recreational uses.	No change.
BIG LAKE-HOUSTON REGION				
Friends of Mat-Su	Unit H-05	Recommends designating this unit as Public Facilities-Retain (green infrastructure).	Partly concur. Further review of soils mapping indicates that much of the western part of this unit is inappropriate for development. This western part should be dropped, with only a small part	Change in part. See 'Response'. The western part of this unit should be designated 'Habitat'.

Commenter	Subject (page)	Issue	Response	Recommendation
			of the eastern part retained as Settlement. The western part of this parcel should be designated Habitat; management intent for this unit should match this designation.	
I	Unit H-06	This parcel is unsuitable for Settlement; change to Public Recreation designation to protect trails.	Further review of soils information not available at the time of plan preparation indicates that this parcel is not suitable for settlement. However, DOF indicates that this unit is important to the state for its forestry values; it is part of the sustained yield area for the Susitna Valley. U-01, which adjoins this parcel to the north, is designated Forestry. It is contiguous with the DOF Zero Lake Management Block and is to be designated to be a portion of the area harvested for the small local logger. These local loggers use this timber to supply local sawmills. Trails will be protected in timber harvest design	Revise: Change from Settlement to Forestry with management intent to protect trails.
Friends of Mat-Su	Unit H-09	Recommends designating this unit as Public Facilities-Retain (green infrastructure).	This parcel has been used previously by the state and is appropriate for eventual settlement. The unit is heavily wooded, contains gentle slopes with excellent views to the south, and access is nearby. The Settlement designation remains valid.	No change.
Friends of Mat-Su	Unit H-18	Recommends designating this unit as Public Facilities-Retain (green infrastructure).	This unit is nearly level, is accessed by road and other infrastructure, nearby residential uses exists, and contains other attributes conducive to settlement. DNR is aware of the significant values associated with Meadow Creek. We have created a separate parcel (H-18) at the terminus of the creek with Big Lake, designating it Habitat, and have an extensive protection area (200') on either side of this creek. Other protection	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
			measures are noted in the management intent statement.	
RADS	Unit H-27	<p>This unit contains an extensive area of wetlands and is not considered suitable for development. It adjoins the Susitna Flats Game Refuge and should be managed, in part, to protect the water resources and habitat that are present within this unit.</p> <p>This unit was not included in the Fish Creek Management Plan (FCP), which is in the process of development. The reason for this is unclear since this parcel is clearly part of what would normally be considered the planning area of the Fish Creek Plan. The FCP recommends, depending on location, general use, agriculture, and habitat for areas adjoining this property. The best fit with the FCP is General Use.</p>	<p>The general use designation is often used when a predominant use cannot be determined. This, we believe, is the situation in this case. For whatever reason this parcel was not included in the Fish Creek Management Plan that is now under preparation. Final recommendations from this plan are not available at this time. However, interim recommendations for adjacent areas include habitat, general use, and agriculture.</p> <p>Given this context, the current designation of General Use is appropriate. However, the management intent language should be augmented with language that requires the unit to be managed to protect the water resources and habitat present within the unit and that are related to the adjacent Susitna Flats State Game Refuge.</p>	Revise: Add to management intent the following: The unit to be managed to protect the water resources and habitat present within the unit and that are related to the adjacent Susitna Flats State Game Refuge.
ADFG	Unit H-28	Wetlands should be avoided in any authorizations that may be issued and a 200' riparian buffer should be imposed on Meadow Creek.	Concur.	<u>Change management intent to include a 200' riparian buffer on Meadow Creek and note that authorizations are to avoid wetland areas.</u>
SUSITNA CORRIDOR REGION				
I	Unit S-01	<p>This unit adjoins the Willow Creek SRA and the Susitna river. This area was designed in 2000 by a contractor working for the state for recreational use. Moreover, this area may be within the 100 year floodplain. Given the location of the unit settlement is inappropriate.</p>	Concur.	Revise: Change designation to Public Recreation-Dispersed.
I	Unit S-04	Concerned with the Settlement Designation. The northernmost part of the unit comprises the outlet for Vera	Partially concur. This unit is appropriate for development; it contains relatively good soils, has been previously	Revise: Consider recreational uses and values in subdivision design and maintain (or realign) recreational trails if

Commenter	Subject (page)	Issue	Response	Recommendation
		Lake; there is no actual lake but more of a boggy wetland. Boggy vegetation blocks access to the lake. Also the northern part of the unit is used by snowmachines and dogsleds and the Iditarod Trail crosses portions of this area.	designated for Agriculture, there is access to both the stream and lake, residential development now occurs on portions of Vera Lake, and access is nearby and is likely to be improved in the future. Nonetheless, the management intent statement needs to be revised in part to note the concerns over winter recreational use, including the possible use of this area for the Iditarod Trail.	found to be present. <u>Particular attention is to be given to the winter recreational uses that occur in the northern part of this parcel, which may include the Iditarod Trail, when the restart occurs from Willow.</u> Maintain
WILLOW REGION				
I	Unit W-01	Windy Lake and adjoining wetlands have 3-4 important Haessler-Norris Trails crossing it and it is being looked at for future expansion of trails. Current use is for recreation, watershed and wildlife, which outweighs its forestry value. If logged, trails should be protected and improved and land kept in public ownership.	Partially concur. While this parcel is important to the state forestry allowable cut, it also has the important recreational trails as noted in the plan's management intent statement for this parcel. In addition to the no cut buffer on Windy Lake, a 50' buffer should be applied to the trails.	Add to Management Intent for parcel W-01: "Maintain 50' protection area (no cut) on both sides of Haessler-Norris Trails."
I	Unit W-02	Parcel is mostly wetlands and the area has a heavily used winter trail network. Given that the adjacent University land is to be sold there is a need for public open space.	Concur. This unit has more recreation value than settlement.	Change land designation from Se to Rd.
I	Unit W-15	Land subdivision should be 10-20 acre lots to support mushing. General overcrowding exists in this area which is having a negative effect on mushing.	Partially concur. The management intent for this unit states that development should only occur after a framework plan is developed and large lot sizes should be considered. Since land use trends will be more established in the future, it is more appropriate to make the decision of lot sizes in the context of the framework plan. It can then be decided what portion, if any, of the subdivision design should be devoted to large lots.	No change.
RADS	Unit W-15	Revised soils data shows most of parcel to be unsuitable for building.	Large wetland areas should be redesignated for watershed values.	Create Unit W-20 from the middle and north portion of W-15 and designate as

Commenter	Subject (page)	Issue	Response	Recommendation
				Wr. Retain remainder as Settlement.
I	Unit W-17	This unit should be set aside for the Iditarod Trail Committee for a headquarters and restart area. It lies close to the Parks Highway and the Iditarod Trail and abuts the Willow Creek State Recreation Area.	Partially concur. This idea has no formal application for this use from the Iditarod Trail Committee and needs to be carefully considered by them. To allow for this a short moratorium on land sales will take place. There is nothing in the Settlement designation that precludes use of a portion of this unit for the Iditarod Race.	There is no change to the designation of Settlement but management intent will be amended as follows: "This unit will not be considered for land sales for three years following plan adoption to allow for the consideration of this site's potential for a facility supporting the Iditarod Race. A best interest determination must find that it is in the best interest of the state to proceed with a land disposal for this purpose."
I	Unit W-17	This unit should not be designated for Settlement as this would destroy the viewshed of those using Willow Creek (the adjacent State Recreation Area (SRA)).	Partially concur. The viewshed is an integral part of the recreation experience that the SRA was created to protect and it should be protected by adjoining land uses.	Add to the management intent for this unit the following: "Protect the viewshed from the adjacent SRA by using building setbacks and partially vegetated buffers, or similar techniques designed to protect the viewshed."
KASHWITNA REGION				
Nature Conservancy	Unit K-02	Use FRPA requirements to determine minimum distance of buffers for gravel mining.	Unit is affected by an ILMA with ADOT/PF for a gravel site. These requirements apply.	See also response in Chapter 2.
I	Unit K-02	Unit should be managed for Public Recreation. Adjacency to Susitna River and lack of public land as green spaces were reasons given for recommendation.	Unit is affected by an ILMA with ADOT/PF for a gravel site. These requirements apply.	No change.
I	Unit K-05	Unit should be retained in public ownership and be considered as a future rest stop / scenic day use area. Scattered residential development along highway not preferred. There is little public land adjacent to Parks Highway suitable for such a use.	Unit remains appropriate for land disposal because of its proximity to the Parks Highway and because it has good quality soils and is generally level. The consideration of a rest stop is beyond the scope of this plan and is ultimately the decision of ADOT/PF.	No change.
I	Unit K-07	Unit should be managed for Public Recreation. Settlement not appropriate near Montana creek because of erosion problems.	Unit has forested uplands and proximity to Montana Creek road causes it to be appropriate for development. The problem of erosion has been mitigated by	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
			the installation of rip-rap ADOT/PF.	
I	Unit K-11	Research and protect existing trails.	Water Resources designation imposes protection for all resources within the unit, including trails.	No change.
Susitna Community Council	Unit K-12	Change to Water Resources and retain in state ownership for protection of wetlands and Goose Creek by DNR not the developer, by designating (specific) areas for protection. Also recommend protection of trails because of heavy use in winter.	Partially concur. Further review indicates that wetlands are located in the western portion of unit contiguous with K-11 and forested uplands (with access) are located in the east. As a result, K-12 will be adjusted to exclude the west half which will be consolidated with K-11, which is Water Resources. The remainder of the unit will be retained as Settlement designation.	Revise map to reflect changes.
I	Unit K-18	Wetlands should be protected by DNR not the developers, by designating (specific) areas for protection.	Unit management intent provides protection of wetlands and imposes a 150' protection area adjacent to anadromous stream.	No change.
I	Unit K-19	Wetlands should be protected by DNR not the developers, by designating (specific) areas for protection.	Unit management intent provides protection of wetlands and imposes a 150' protection area adjacent to anadromous stream.	No change.
I	Unit K-23	Unit should be retained in public ownership for wetland protection of Sheep Creek drainage.	Unit is designated Water Resources and is to be retained in state ownership. Management intent already protects Sheep Creek and its adjacent wetlands.	No change.
I	Unit K-27	Change to Public Recreation and retain in state ownership for protection of wetlands by DNR not the developer, by designating (specific) areas for protection.	Unit has large areas of forested uplands, well drained soils and is generally flat. It is appropriate for disposal during the planning period (although its remoteness and lack of access might delay development for some time). Unit management intent provides protection of wetlands and imposes a 150' protection area adjacent to anadromous streams. The plan identifies general areas for settlement in order to provide flexibility in subsequent subdivision design.	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
I	Unit K-28	Change to Public Recreation and retain in state ownership for wetland protection.	Unit has large areas of forested uplands, well drained soils and is generally flat. It is appropriate for disposal during the planning period (although its remoteness and lack of access might delay development for some time). Management intent provides protection of wetlands and imposes a 150' protection area adjacent to anadromous streams.	No change.
I	Unit K-29	Change to Public Recreation and retain in public ownership to protect local spring. Local residential development presents possible risk of contaminating water source. Develop parcel into a rest stop or day use area.	Partially concur. Further review indicates the presence of wetlands and a local spring in the southern portion of the unit adjacent to the Parks Highway. Accordingly, create a new unit with a Water Resources and Public Recreation co-designation that coincides with the area of wetlands and spring. A co-designation is used because of the need to preserve the hydrology and watershed of the new unit. The remainder of the unit, which is forested, remains Settlement.	Create a new unit with co-designation of Water Resources (Wr) and Public Recreation (Pr). See plan map.
I	Unit K-31	Unit should be retained in state ownership.	Unit has forested uplands, is generally level and has road access. It is appropriate for disposal.	No change.
I	Unit K-32	Unit should be retained in state ownership and managed for Public Recreation.	Unit is affected by an ILMA with ADOT/PF for a gravel site.	No change.
I	Unit K-33	Change to Water Resources and retain in state ownership.	Unit has forested uplands and road access. It is considered appropriate for development during the planning period.	No change.
I	Unit K-35	Change to Water Resource. (Note: currently designated Public Recreation).	Unit is adjacent to the Kashwitna River, is heavily forested and generally flat. These resources do not meet the definition of Water Resources. Unit is currently designated as Public Recreation and is to be retained in state ownership. This provides the same level of protection as the Water Resources designation.	No change.

Commenter	Subject (page)	Issue	Response	Recommendation
I	Unit K-41	Change to Water Resource.	The General Use designation is often used when no single use predominates within a parcel. These are extensive areas of forested uplands and a variety of uses can be accommodated. Units designated Water Resources contain mostly wetlands.	No change.
I	Unit K-41	Request this unit be considered as Settlement (Se) but reserve large units for mushing i.e. 10, 15, 20 acre units.	Because of its location, immediate development is not anticipated within the planning period. A General Use designation is more appropriate; the management intent for this parcel indicates that development during the planning period is unlikely.	No change.
I	Unit K-42	Combine with U-01 for continuity.	U-01 and K-42 are designated Forestry and Water Resources respectively. Each unit has vastly different resource values and management intent and the combination of these two dissimilar units would be imprudent.	No change.
I	Unit K-43	Change to Water Resource.	The General Use designation is often used when no single use predominates within a unit. These are extensive areas of forested uplands and a variety of uses can be accommodated. Units designated Water Resources contain mostly wetlands.	No change.
I	Unit K-51	Unit should not be designated Settlement until the Susitna Community Council develops a SPUD.	See response in Chapter 2.	No change.
I	Unit K-52	Change to Water Resource.	The General Use designation is often used when there is no single predominant use within a parcel. These are extensive areas of forested uplands and a variety of uses can be accommodated. Units designated Water Resources contain mostly wetlands.	No change.
I	Unit K-55	Change to Water Resources because of presence of wetlands.	Partially concur. Areas adjacent to streams are occupied by extensive	Create a new unit with co-designation of Water Resources. See plan map.

Commenter	Subject (page)	Issue	Response	Recommendation
			wetlands and a new unit will be created for these wetlands with the designation of Water Resources. The remaining forested uplands are appropriate for disposal and will be retained as Settlement.	
I	Unit K-58	Request this unit be considered as Settlement but reserve large units for mushing i.e. 10, 15, 20 acre units.	DNR does not have jurisdiction on this unit per Department Order 142. Unit is designated a 'Mental Health Replacement Lands' in Final Finding Decision.	No change.
I	Unit K-60	Request this unit be considered as Settlement but reserve large units for mushing i.e. 10, 15, 20 acre units.	DNR does not have jurisdiction on this unit per Department Order 142. Unit is designated a 'Mental Health Replacement Lands' in Final Finding Decision.	No change.
TIDELANDS AND SUBMERGED LANDS				
MSB	Unit TT-01	This tideland unit should be reduced in its southern part near Point MacKenzie, to create a new tideland unit that encompasses tide and submerged lands that are likely to experience development pressure within the planning period.	Concur.	Revise Plan Map.
MSB	Unit TT-03	A new tideland unit should be created (see above) that encompasses likely areas of tide and submerged lands development during the planning period. MSB maintains that there are likely to be a number of major development projects of regional and state-wide importance in this area, and this growth needs to be accommodated; the new unit should have a designation of Waterfront Development.	Concur.	Revise plan map to include a new tideland parcel that extends northward approximately 2.5 miles to the half-section line of Section 12, SM, T14NR04W. This unit is to be designated Waterfront Development. Management intent is to acknowledge the probable use of this unit for waterfront development and to accommodate road and/or utility corridors, among other projects. Concurrently, it is also to specify that such projects are to avoid areas of estuarine wetland and that the summer feeding and migration areas of Beluga whales are to be protected.

Commenter	Subject (page)	Issue	Response	Recommendation
NAVIGABLE RIVERS AND LAKES				
ADFG	Navigable Waters (3-79)	The list of streams and lakes that are listed in the plan needs to be expanded to encompass numerous other rivers of significance.	The listing provided on p. 3-79 is not meant to be exhaustive; it is meant to identify only the largest streams and lakes. Navigable waters that are anadromous are currently designated as Habitat (p. 3-80). Nonetheless, the listing of streams and lakes should be expanded to include additional important streams and lakes noted by ADFG.	Revise listing of streams that are designated Habitat and Water Resources to include: Little Willow, Goose, Rogers, Sawyer, Deception, Lilly, Lucille, Fish, and Sheep Creeks. Revise listing of lakes to include: Bench Lake, Blodgett, Caswell, Cloudy, Gene, Horseshoe, Little Beaver, Mirror, Rainbow, Stephen, Sunshine, Threemile, Rainbow Lakes, Stephan, Sunshine, Anderson, Dry, Flat, Kings, Lynx, and Wasilla Lakes.
ADFG	Navigable Waters (3-80)	The list of streams and lakes that are listed in the plan needs to be expanded to encompass numerous other creeks.	The plan does not list all of the streams that may occur within the planning area. To do so would be impossible. In any event, the standard for navigable streams that are anadromous on page 3-80 provides for such streams to be designated Habitat. However, a further listing of some streams is not inappropriate.	Under this management guideline (line 5) include as a footnote the following: Includes but is not limited to the following: Iron, No Name (inlet of Nancy Lake), Crocker , 196 and 197 Mile, Caswell, Little Montana, Lake, and O'Brien Creeks.

Chapter 4

Commenter	Subject (page)	Issue	Response	Recommendation
RADS/MSB	Rescission of Deception Creek and Kashwitna Management Plans (4-6)	Chapter 4 mentions that the SSAP supersedes the Willow Sub-basin Area Plan, but it does not mention that the two other management plans affecting this area (Kashwitna and Deception Creek) are affected by the SSAP are also rescinded. This needs to be clarified.	Concur.	Add a new section in Chapter 4 following 'Classification Order': <u>Effect of SSAP Upon Other DNR Plans. This revision supersedes and replaces the 1982 Willow Sub-Basin Area Plan, the two area management plans (Kashwitna and Deception Creek), and the affected portion of the Susitna Area Plan. Classifications in each of the areas previously affected by these plans are superceded by Land Classification Order SC-08-001 in this plan.</u>

Glossary

Commenter	Subject (page)	Issue	Response	Recommendation
I	Glossary: Anadromous waters	The definition used in the plan is too narrow. Not all anadromous waters in Southcentral Alaska are included in this publication. Fully another 50% of the waters within southcentral drainages may be anadromous but are not included in the Catalog.	Concur.	Add to current definition <u>'or has been determined by ADFG to contain or exhibit evidence of anadromous fish in which the anadromous portion of the stream or waterbody extends up to the first point of physical blockage.'</u> Also add reference to AS 41.17.950(1), which provides a statutory definition of anadromous waters.
RADS	Glossary: Feasible and Prudent	Add the definition of 'feasible and prudent'.	Concur.	Add: <u>Consistent with sound engineering practice and not causing environmental, social, or economic problems that outweigh the public benefit to be derived from compliance with the guideline.</u>
I	Glossary: Habitat	The current definition is too narrow; it emphasizes the concentrated lands and waters for species at important times in their life cycle, not during the entire life cycle.	This definition focuses on the critical periods of species life cycle when alterations in habitat or disturbance could affect the population of the species. This is tied to the concept in the definition of Wildlife Habitat Land that ensures the supply of sufficient numbers or a diversity of species to support commercial, recreational, or traditional uses on a sustained yield basis. When this definition is applied in delineating areas with a plan designation Habitat, it is used in combination with the fish and wildlife categories that are listed in this definition as significant. Together, these function to provide a comprehensive framework for the identification of habitat areas.	No change.
I	Glossary: Habitat	The definition of Habitat should be one that is more commonly used in the literature. In the manner that the term Habitat is used in the SSAP it is too	Partly concur. The use of the term Habitat will be noted as applying specifically within the meaning of the SSAP. A more general	Add as footnote to Habitat: <u>The term habitat has a meaning that is specific to this plan. A more general definition of habitat is "The location or environment</u>

Commenter	Subject (page)	Issue	Response	Recommendation
		narrow a definition and therefore creates too high of a bar in order to warrant the protection of sensitive habitat areas.	<p>definition of habitat will be noted.</p> <p>Use of the specific meaning of the term Habitat does not create too high of a bar. Definitions are not the only tools that DNR uses to identify and define habitats. We are guided, as well, by the listing of fish and wildlife categories that are contained on p. A-4.</p>	<p><u>where an organism (or a thing) is most likely to be found.” This more specific meaning is applied to be consistent with the intent of 11 AAC 55.230, which provides a definition of ‘Wildlife Habitat Land’.</u> See p. 4-3.</p> <p>No change.</p>
I	Glossary: Suitable	The definition of Suitable that is used in this plan is too narrow a definition. It is also misleading. It should include the concepts of compliance with local land use plans and zoning, and with adjacent land uses.	Partly concur. The definition of suitable should be broadened to include aspects that would normally come to mind in the common use of this term.	Revise to: Land that is physically capable of supporting a particular type of resource development, <u>avoids or minimizes impacts to the natural environment, and is compatible with adjacent land uses and adopted land use plans.</u>
I	Glossary: Sustained Yield	The glossary should contain a reference to sustained yield.	Concur. However, there are two pertinent descriptions of sustained yield that are relevant to this plan: one relating to forest resources and another, to land.	Add: Sustained yield: <u>The definition of sustained yield as applied to forest resources in this plan corresponds to AS 41.17.950(27) and as it applies to land related issues, to AS 38.04.910(12).</u>
I	Glossary: Viewshed	The definition of viewshed is too narrow.	Concur.	Revise to: An area of land, water, and other environmental elements that is visible from a fixed vantage point. In urban or regional planning viewsheds tend to be areas of particular scenic or historic value that are deemed worthy of preservation against development or other change. The preservation of viewsheds is a goal in the designation of open space areas, green belts, and community separators.

ⁱ “I” indicates that one or more individual raised this issue.