

Susitna Matanuska Area Plan – Public Review Draft

Issue Response Summary

Chapter 1: Introduction

Subject (page)	Issue	Response	Recommendation
LINE BY LINE ANALYSIS			
Pg 1-6 Ln 10	There is objection to the word ‘provided’ in this sentence. (It refers to the ability of the public to access state land.) Recommends rewording to state that public land is open to the public. Access to state land should not be provided without the ability of the state to properly manage this land.	This is a fine point, but it is probably preferable to use the word ‘ <i>assured</i> ’ rather than ‘provided’ for the reasons stated in Issue.	Revise plan; see Response.
Pg 1-6 Lns 12-13	This sentence speaks to the intention of the SMAP to provide consistent and coherent management direction for state land. Unfortunately, the plan uses words like ‘practical’ or ‘feasible’ and does not provide the specificity that is needed to give clear direction to a potential decision.	The DMLW decision making process for most authorizations requires the preparation of a written decision. The intent of the area plan is to provide general guidance to a category of decision but not to be so specific that flexibility is taken away in the written decision. These decisions allow DMLW to tailor stipulations to the particular conditions of the site and project, and the plan cannot anticipate the specifics of future decisions. It should only provide general guidance for such decisions.	No change.
Pg 1-10 Ln 31	There is no reference to multiple use in the state constitution as stated in this sentence.	Sections 1 and 2 of Article VIII (Natural Resources) have been interpreted to include the concept of multiple use.	No change.

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TOPICAL ANALYSIS (organized by topic in plan sequence)			
General: planning map	A planning area map should be included in Chapter 1.	Concur.	Revise Plan: add overview map in Chapter 1.
General: Compare 1985 SAP with 2010 SMAP	A comparison of the differences and similarities between the two plans should be provided.	Plan revisions do not include such analyses; they are usually part of the presentation that is provided to the public at the public outreach meetings. This presentation is available on the web at: http://dnr.alaska.gov/mlw/planning/areaplans/sumat/	No change.

Chapter 2: Areawide Policies

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LINE BY LINE ANALYSIS			
Pg 2-2 Ln 17	Add above-ground renewable energy resources to the goal dealing with sustained yield.	Concur. The goal will be changed to read: “Sustained Yield. “Maintain...timber, <i>and above-ground renewable resources.</i> ”	Revise plan; see Response.
Pg 2-14 Ln 9	In the section that deals with the requirement for DNR adjudicators to attempt to acquire habitat information prior to making a decision in an area designated Habitat, commenter suggests using the word ‘shall’ rather than ‘should’.	DNR area plans use the word ‘should’ in those instances where some flexibility should exist on the part of the adjudicator. The word ‘should’ still requires the adjudicator to attempt to acquire such information.	No change.
Pg 2-14 Lns 22-24	In this section (Fish and Wildlife Habitat) and in other sections of the plan the statement is made that other agencies should be contacted to acquire additional information, if needed. However, the public often has local knowledge and should be consulted. The requirement to consult with the public should be stated in the plan.	When additional information is needed in a decision, DNR typically looks to other governmental agencies – local, state, and federal – for the requisite information. These are almost always the best sources of information and they often will have ‘official’ sources of information that we can rely on (and must rely on) in our decisions. We concur that the public may have such information as well, but our first need is to turn to other agencies for information. If an adjudicator cannot find such information from these agencies, the plan does not constrain the adjudicator from requesting information from the public. All of our decisions involving the disposal of state interests in land require public review, and it is expected that local information will be picked up through that venue.	No change.
Pg 2-16 Lns 8-12	The use of all the qualifiers in this sentence (referring to the alteration of the riverine hydrologic system) serves to make the guideline meaningless and almost guarantees that riverine alteration will occur. This type of language is not in the public’s interest and the commenter urges the use of substantive protection language (i.e., remove	The wording ‘to the maximum extent feasible’ has a very precise meaning in resource management (derives from language related to the coastal zone program) and is appropriate for use. The use of the words ‘significant’ and ‘important’ does not mean that adjudicators can disregard this standard; it simply means that the focus is on substantive impacts (since all uses will have some amount of impact). Much more definitive requirements for riverine protection is	No change.

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	the qualifiers).	contained in the section on Shorelands and Stream Corridors and are intended to provide a high level of protection to such areas. See management guideline H and its table (Table 2-1).	
Pg 2-16 Lns 26-43	It is not clear if the word ‘facilities’ refers to public or private or both. The language in the plan should be clarified.	<p>The word ‘facilities’ is a word of art that refers to the standards applied by the U.S. Fish and Wildlife Service to the protection of bald eagle nests. Because it has a particular meaning within the context of their standards on bald eagle nests, we do not want to use other wording.</p> <p>In practice, the siting restrictions around bald eagle nests affect all DNR authorizations. This would include land disposals and timber harvest, most usually. In the context of a land disposal decision it means that the subsequent private uses of land must avoid bald eagle nests. As a practical matter, however, DNR in its land disposal program actually sets aside lots or (less frequently) tracts within a subdivision as a ‘bald eagle tree’ that is then retained in state ownership. There is no need to strengthen language in this section to more effectively protect bald eagle trees given the DNR practice of retaining such areas.</p>	No change.
Pg 2-18 Lns 17-29	Referring to Trumpeter Swan management guidelines, the word ‘should’ ought to be replaced with ‘shall’.	<p>It is appropriate to use the word ‘should’ in this particular management guideline since DMLW wants to give some amount of flexibility in how nesting sites are to be protected.</p> <p>As a matter of practice there are complications if an area plan uses the word ‘shall’. Whenever this word is used it requires that the management guideline be followed in a decision; there is no discretion provided and any deviation from a guideline with the word ‘shall’ requires a plan amendment. Plan amendments are time consuming and difficult to do and essentially the same thing is accomplished as if the word ‘should’ is used. When the latter is used, any deviation from the guideline must be explained and justified in a DNR written decision. This approach is equally effective but avoids the time consuming process of a plan amendment. All such decisions are available to the public and the public can</p>	No change.

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		comment on the proposed action.	
Pg 2-30 Lns 24-28	Commenter recommends that the word 'avoid' in the goal section of Recreation and Scenic Resources be added to the wording in line 24, to read "management of recreation to <u>avoid or</u> to minimize user conflict, ..."	Concur. <i>Add word 'avoid' to line 24 as stated in Issue.</i>	Revise plan; see Response.
Pg 2-32 Lns 8-12	<p>Commenter questions the need for the wording 'to the extent provided by law' and is confused over the phrase 'variety of uses and vehicle types'. What does the latter mean?</p> <p>In addition, the management guideline should be changed to read: <i>"DNR shall manage recreation use and activities to accommodate a variety of uses, including motorized and non-motorized, recognizing that some uses may be incompatible either with other uses or with the character of the environment in a given area, while ..."</i></p>	<p>The wording 'to the extent provided by law' is included in this management guideline to clue DNR adjudicators that aspects of Administrative Code (11 AAC 96.020) and statute (AS 38.04.200) apply. However, we agree that the statement can be improved by adding references to specific citations. Accordingly, add the aforementioned citations to this sentence.</p> <p>The same response applies to the wording of the phrase 'variety of uses and vehicle types'. This phrase can be clarified by adding a statutory reference to AS 38.04.200 since this is where the wording comes from.</p> <p>Certain changes to the wording of this management guideline are appropriate and the guideline will be changed to the following: <i>"To the extent provided by law (AS 38.04.200 and 11 AAC 96), DNR will manage recreation use and activities to accommodate a variety of uses, including motorized and non-motorized, while ensuring ..."</i></p>	Revise plan; see Response.
Pg 2-36 Lns 22-23	The last <u>sentence</u> should be changed by adding the word 'trails' to read "ADF&G and other agencies or authorities shall be consulted to ensure there are no habitat associated impacts from parking areas, <u>trails</u> , or trailheads."	<p>Concur. Revise plan to include new wording:</p> <p><i>"ADF&G and other agencies or authorities shall be consulted to ensure there are no habitat associated impacts from parking areas, <u>trails</u>, or trailheads."</i></p>	Revise plan; see Response.
Pg 2-36 Ln 9	The management language that supports the goal of 'responsible wildlife and fish habitat conservation as a goal' needs to include clear, strong statements that describes the	The problem of widespread impacts upon sensitive lands (wetlands, stream corridors, and the like) is a pervasive problem throughout the state and requires a coordinated, statewide solution. While we recognize the legitimacy of the	No change.

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	circumstances and impacts of unfettered ORV use on state lands and provides specific guidance to address this problem.	argument that is being made, the solution for this problem is beyond the scope of this plan.	
Pg 2-41 Ln 27	The comment 'adjudicators are to consult' an on-line procedure manual is too limiting. These often become out of date. Consult other sources as well.	DMLW has put considerable time and effort in developing procedures for the protection of riparian areas and we wish for our adjudicators to use the online material. We intend to keep it up to date.	No change.
Pg 2-42 Lns 24-35	(Referring to the Lakeshore Public Access guideline), what does 'a portion' mean? How is the size determined? To protect lake shore property, this guideline needs to be strengthened.	<p>'A portion' means part of the lakeshore.</p> <p>Guidelines for determining size are given on lines 33-35. The actual determination of area is made as part of subdivision design.</p> <p>DMLW believes that the protection of the inlet and outlet streams (and there may be many of these) plus a specific area for public access and storage provide essential protection. The specific areas that are to be protected are determined for a land disposal at the time of subdivision design; management guidelines in the Settlement section indicate that fragile environmental areas require protection, with these areas left as open space (tracts) in the subdivision.</p>	No change.
GENERAL			
1985 SAP Management Guidelines	The previous SAP guidelines should be retained: 1) develop a classification of lakes (wilderness, recreation, and mixed development and apply to each area of proposed land disposal), 2) and all islands and at least 50% of lake front property should be retained. 3) In addition, the wetland management guideline that high value wetlands are to be retained in state ownership (this would include most wetlands) and all state land that occupies slopes of 25% or greater should be retained. 4) There should be a minimum standard of	<p>It is inappropriate to retain the current 1985 SAP requirements for the following reasons:</p> <p>1. The classification of lakes was found difficult to use and was not followed in the process of land disposals.</p> <p>2. The requirement to retain islands and such a high percentage of lakeshore property is inconsistent with the need to maintain flexibility (some islands should be retained but others are appropriate for disposal; this is often a function of size) and deprives individuals of the use of lakefront property, which is extremely attractive and popular. The visual and riparian impacts that might be caused by the greater use of</p>	<p>No change.</p> <p>No change.</p>

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	200' each side of unnamed streams and at least 300' on anadromous streams, particularly the larger streams that are used for popular recreation.	<p>lakefront property can be mitigated by DMLW riparian management standards, which did not exist in 1985, but which are now in place and are applied in subdivision design.</p> <p>3) The effect of the wetland management guideline would be to preclude the use of most state land since most is classified as 'wetlands' under the federal definition. Also, the 1985 plan standards conflicts with the federal Section 404 program, which evaluates wetland use based on function (not on plan definitions). The Section 404 (wetlands) permitting program was not in effect throughout most of Alaska in 1985, but it now encompasses the entire state and is the basis for wetland decision-making. The 1985 standards conflict with the requirements of the 404 program and would create confusion if applied.</p> <p>4. The effect of applying a 200' minimum protection area for <i>all unnamed</i> streams (which includes very small streams) would be to make development in many areas practically infeasible. It is appropriate to protect the riparian area of anadromous and high value fish streams and of the larger streams, but a blanket requirement to impose a 200' minimum is inappropriate. Many of the larger streams are assigned a 300' protection area.</p>	<p>No change.</p> <p>No change.</p>
TOPICAL REVIEW			
Agriculture: Distribution of parcels designated Agriculture	Within the planning area there are some units (B-06, M-23, and M-26) which are far apart from the other units designated Agriculture (S-11 S-14, P-07, P-12, G-07, U-18), which are located between Petersville and Willow. All of these parcels have the best agricultural soils in Alaska. It seems unreasonable to designate agriculture areas so far apart since any agricultural production needs highly specialized farming equipment, all of which are very expensive, and the	While several of the parcels that are designated Agriculture are relatively remote and isolated at this time, the planning period of the area plan is 20 years. During that period it is likely that areas that are now without access roads be provided with some level of access, and it is not at all certain that heavy machinery will be required for some of the agricultural operations that are now taking place; these are often labor intensive operations that fulfill a specific economic niche and often do not require heavy machinery. Moreover, it is not inappropriate in a plan of this type to identify agricultural parcels with the idea that some, or many, may not be	

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	transportation of agriculture machinery between these areas is problematic. Suggests changing the designation of these units, extending P-12 between east and west units S-36 and P-15, reducing P-09 and connecting with P-12. S-11 should be extended across the riparian buffer and connect with P-12. In exchange, the more distant parcels (B-06, M-23, and M-26) would be assigned a Forestry designation as part of M-07.	developed during the planning period. There is an advantage to identifying agricultural land now and retaining it is a protected status for future agricultural needs that cannot be foreseen at this time. This, in fact, is the policy of the Division of Agriculture. The issues raised in this comment are also addressed in certain of the individual management units; see Chapter 3 responses.	
Agriculture: General	Review of the Agriculture section by the Division of Agriculture identified a variety of concerns, including changes to goals and management guidelines.	It is appropriate to (significantly) modify the Agriculture section of Chapter 2, in response to Division of Agriculture concerns. Reevaluation of the section of the Administrative Code revealed that many of the code sections that the PRD had relied on had been recently annulled by the state.	Revise plan; see Attachment A, Revisions to Agriculture Section, Chapter 2.
Agriculture: Protection of Agricultural Lands	Commenter suggests that it is appropriate to protect agricultural lands until they are needed (since it is unlikely that the entirety of the agricultural land base will be developed during the planning period. Agricultural land should not be disposed of until there is a need for more crop land and there is an adequate transportation system.	Generally concur. Add the following under Management Guideline C: <i>“Remote state land with good agricultural potential and designated Agriculture, but not scheduled for sale within the next 15 year period shall remain in public ownership, continue in an Agriculture designation, and shall not be used for other purposes except through a plan amendment that re-designates such areas into another land use designation.”</i>	Revise plan; see Response.
Agriculture: Disposal within Floodways	There are conflicting statements in the same sentence (p. 2-6, pp. 33-34) that state that agricultural land disposals shall not occur within mapped floodways. If you dispose of land within a floodway through a Farm Conservation Plan, this cannot occur based on your first statement.	Concur. Modify management guideline relating to floodways and floodplains to: <i>“Generally, agricultural land disposals should not occur within mapped floodways or within the 10-year floodplain. Where neither of these features have been mapped, the best available information will be used to identify areas where flooding is likely to be a severe limitation on agriculture. Agricultural disposals in such areas should be avoided.”</i>	Revise plan; see Response.
Agriculture: Timber Salvage	Timber salvage should occur prior to the disposal of agricultural rights.	Statutory requirements related to timber salvage as part of an agricultural land disposal already exist. There is no need to repeat these requirements in the area plan. Delete that portion	Revise plan; see Response.

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		of Management Guideline C related to timber salvage.	
Coordination: Local Comprehensive Plans	SMAP does not adhere to local comprehensive plans. A lot of effort by the public has gone into the preparation of these plans but their recommendations are not reflected in SMAP.	DNR reviews these comprehensive plans during the plan preparation process, and may follow their recommendations when appropriate. DNR plan's may deviate from local comprehensive plans if appropriate and if consistent with an overall state interest. The state's interests in its lands may differ from those of local community or borough and the SMAP may use different designations or use different management requirements when it makes sense to do so and when there is an overriding state interest that is being served.	No change.
Coordination: Special land use designations	The borough's special land use designations (SLUD), which are a type of zoning, should be noted.	The current wording (p. 2-8, lines 25-28) specifies "comprehensive plans and zoning map/ordinance". SLUDs are a form of zoning and are covered by the use of the word 'zoning'.	No change.
Coordination: Noticing of Adjacent Property Owners	Commenter suggested that the current notice language be revised to indicate that "At the minimum, adjacent land owners will be notified of the proposed action."	Area plans as well as most other DMLW decisions follow the requirements of AS 38.05.945 and the DMLW On-Line Procedure Manual. It is beyond the scope of the area plan to institute separate procedures for the SMAP planning area.	No change.
Coordination: Trespass	The Upland Owner Guideline (management guideline C) should be revised to read: "... over the objection of adjacent land owners, but will fully consider possible trespass impacts as part of the decision making process."	Best interest findings (DMLW written decisions) consider a wide variety of topics, one of which is trespass. DMLW is reluctant to modify the wording of the management guideline since to do so would give the impression to the adjudicator that this aspect of a decision should receive particular weight whereas a wide variety of issues must be addressed.	No change.
Fish and Wildlife: Definition of habitat	The current definition of Habitat in area plans contains the words 'a permanent loss of a population or sustained yield of the species'. The underlying goal of habitat protection, both in land use designations and in making land management and permitting decisions is to preserve and maintain the health and diversity of local wildlife populations. If land managers are only guided to prevent a permanent loss of a	This definition has been in use for a very long time, and at the least it dates from the Kenai Area Plan (2000). All of the subsequent area plans have used essentially the same definition. We recognize that there may be problems in the application of this definition and have begun discussing wording changes with the ADF&G, but it is unlikely that alternative wording will be prepared and approved by the two agencies prior to plan adoption, particularly since the two agencies are also	No change.

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	populations or sustained yield of a species they would be protecting virtually nothing.	involved in discussions relating to a similar topic of change to the Wildlife Habitat definition in Administrative Code.	
Fish and Wildlife: Trumpeter Swans	Management guideline M under the Fish and Wildlife section says that surface entry should be avoided within one-half mile of a swan nesting site. This is the start of restrictions on snowmachiners. April is a good time to ride and it would be a shame if this activity were to be discontinued.	The use of motorized off-road vehicles is not affected by the area plan. Restrictions on this use can only occur by regulation (to limit or constrain a use otherwise allowed under 11 AAC 96.020) and none are proposed in this plan.	No change.
Fish and Wildlife: Definition of Wildlife Habitat in Administrative Code	The current meaning of this definition is very difficult to discern and so provides little guidance to planners, land managers, or the public. Suggests changing the definition to: “1) Serves as a concentrated use area for fish and wildlife species during a sensitive life history stage where alteration of the habitat and/or human disturbance could result in a loss of healthy and diverse local populations; 2) or a unique, rare, or important assemblage of a single or multiple species of regional, state, or national significance.”	We concur that the current definition of Wildlife Habitat Land in the Administrative Code provides little guidance to DNR land managers and for resource decisions, and concur that a change in language is necessary. DNR and ADF&G are currently working to revise this language and hope to submit changes to administrative code text shortly. The exact wording of this definition has not yet been worked out between the two agencies, however.	No change. (The changes that are recommended in the Response section are pertinent to the Administrative Code, and are beyond the scope of this area plan.)
Fish and Wildlife: Habitat Manipulation	If a conflict arises between habitat manipulation, supported by ADF&G, and other uses, supported by DNR, how is the conflict resolved? Does DNR have the final word?	Conflicts between the two agencies, including those related to habitat manipulation, are resolved through interagency discussions. Conflicts that cannot be resolved at the staff level are elevated to the Director (of division) level. DNR manages habitat and makes the final decisions related to this resource.	No change.
Forestry: Forestry designation	It is inappropriate to designate areas Forestry until and unless an updated timber inventory is conducted. The SMAP designation’s as they relate to Forestry are premature and this component of the plan should be shelved until the inventory is	DNR has sufficient resource information available for the purposes of designating lands for Forestry. The proposed SMAP Forestry designations generally overlap with previous ones from the original Susitna Area Plan. Areas having Forestry values are generally well-known and were corroborated through an over-flight of the valley in 2009.	No change.

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	completed.	While the Division of Forestry is currently conducting an inventory of the Susitna forest; and about half of the 800,000 acres have been 'typed' so far, this new information is not necessary for delineating where the forest is located. The new inventory will provide information important for managing these forested areas.	
Forestry: State Forest	Commenter is opposed to the creation of a state forest at this time. There is no reason to set aside land for a legislatively designated area.	The plan only recommends that a state forest be created. In this sense it is advisory and the determination of whether or not to create a state forest will be made by the legislature. Although one commenter opposed the creation of a state forest, most written and oral testimony supported the creation of a state forest. It remains appropriate to include this as a recommendation in the area plan, recognizing that ultimately it will be the state legislature who will make the decision on this issue.	No change.
Forestry: Generally Allowed Uses	If a State Forest is created, would there be the authority to more actively manage Generally Allowed Uses? Problems with summer ORV use require a more aggressive management approach than now taken by DMLW.	Unless the legislation identified constraints upon generally allowed uses (11 AAC 96.020), they would apply. The effects of degradation by summer ORV use, and DNR authority to deal with this use, are described elsewhere in this Issue Response Summary and are not repeated here.	No change.
Forestry: Acreage amount and timber harvest impacts	It is inappropriate to 1) designate such a large area for forestry. There should never be any clearcutting on state lands. 2) Damage is created when a harvest occurs, and, besides, there have been so few actual state timber harvests over the last 20 years that there is no justification for such a large acreage in the forestry designation.	1. The amount of land proposed for Forestry designation is similar to that in the previous Susitna Area Plan, and represents 8% of the total state land within the planning area. Forestry is a suitable designation for these lands, and reflects the primary resource value of the lands affected by the Forestry designation. For comparison, the Tanana Valley State Forest is 1.8 million acres in size; SMAP is proposing designating <700,000 acres for Forestry. 2. A range of silvicultural practices, including clearcutting, are used to manage forests based on landowner goals, operational constraints, and the biological characteristics of the species harvested. With the safeguards provided in the FRPA, harvest operations do not cause adverse impacts to riparian areas, water quality, nor wildlife habitat. Wildlife	No change. No change.

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		habitats are improved by properly designed timber harvests, including managed clearcuts. A large area set aside for Forestry allows harvests to be managed conservatively, and spreads out the effects of harvesting, helping to ensure a range of public values are being met across the forested landscape.	
Forestry: Land reserve	Forestry areas that are remote from roads and other forms of access, which constitute much of the timber base in the Susitna Valley, cannot be logged in the next 20 years. It makes sense to put these areas into a reserve with nothing occurring on these lands; let the next generation make decisions on these lands at that time. Put these lands in a holding designation.	While it may be true that many of these proposed forestry areas will not be actively harvested over the next 20 years, it is valuable and necessary to retain enough forestry lands to properly manage for the estimated 80 to 120 year rotation period between harvests. It would not be appropriate to limit the amount of lands designated Forestry to those anticipated to be harvested within the next 20 years. Additionally, remote forestry lands are often important for meeting local personal use firewood and house log needs, and could potentially support small local milling operations. According to the 1985 SAP, “there are over 100,000 acres of forest land with potential for personal use that are close to either roads or settled areas in remote regions” (p.29).	No change.
Forestry: Commercial Logging and Climate Change	There should be no commercial logging in the Valley except for local use. These lands should be used as a base from which to analyze the effects of climate change.	DNR actively supports local logging operators and businesses, along with the recent high local demand for personal firewood harvesting. Due to the relatively low value of Susitna timber, and the high cost of transporting it to distant markets, there is little anticipation of an export market developing. If conditions changed, DOF would continue to maintain a timber supply for existing local businesses. One of the management options for consideration during the forest resources management planning process will be the establishment of research areas within the Forestry lands that could be used to study climate change, among other research needs.	No change. No change.
Forestry: Ecosystem maintenance	The real value of these lands is in their intrinsic value. If we cut them we will have slowly regenerating forest criss-crossed with roads. This is not as valuable as a legacy as retaining trees as part of an intact ecosystem.	The amount of forestry activities expected to take place over the next 20 years will not have an adverse effect on the existing ecosystem. A robust regulatory framework under FRPA applies to forestry practices to ensure these practices do not harm fish or water quality. Most forestry roads are	No change.

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		temporary and utilized during the winter. Sustainable forest management maintains intrinsic forest values and avoids conversion to other non-forest uses.	
Forestry: Definition of 'Working Forest'	A 'working forest' is not a wilderness forest and activities can include farming, timber, and recreation. Most people value northern forests as essentially natural areas, which is close to the concept of a wilderness forest. A working forest is therefore inconsistent with what most people want in the Susitna Valley.	Community meetings on the draft SMAP indicated widespread support for the concept of an actively managed [state] forest in the Susitna. Lands designated for forestry purposes do not allow for farming or agricultural uses. Much of the proposed Forestry designated land area will serve as a 'de facto' natural area until harvested; and during rotational periods between harvests these actively managed areas will again serve as natural areas for many decades.	No change.
Forestry: Multiple Uses within 'Working Forests'	The phrase 'other multiple uses of state land' within the definition of a working forest is very problematic because it could allow for a variety of uses and this would raise the question of how sustained yield and annual allowable cut volumes are determined. The phrase 'other multiple uses' can be removed from the definition without losing anything.	Concur. <i>Refine definition to clarify what uses are not appropriate in a working forest, such as agriculture, grazing and settlement.</i>	Revise plan; see Response.
Forestry: Area west of Susitna River	1) All state lands west of the Susitna River should be designated as a state forest and 2) DOF should manage it on a sustained yield basis.	1. DNR area plans relate land use designations to the resource value of state land, and there is a diversity of such values in the area west of the Susitna River. It would be inappropriate to designate a critical habitat area Forestry and a forestry area, Habitat, for example. 2. If state lands west of the Susitna River are designated by the Legislature as a State Forest, they will be managed on a sustained yield basis, as required by the state's Constitution.	No change.
Forestry: Sustained yield identification	Without a valid inventory how can the SMAP attempt to define forestry designations and sustained yield areas? Any determination of the lands to include in a sustained yield calculation should wait until this inventory has been completed.	This issue is addressed previously. See 'Forestry: Forestry designation'. The designation of lands to be managed for Forestry is a separate action from the actual management of such lands. An inventory is essential for determining sustained yield of a	No change.

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		<p>forest unit; it is not necessary for identifying lands to be placed into a Forestry designation.</p> <p>The analogy is to anadromous streams; it is appropriate to designate a waterway as anadromous based upon the known presence of salmon. Knowledge of the salmon run size and population is required for setting bag limits and seasons. It is not necessary to have full knowledge of the salmon population to designate a stream as anadromous, as the designation itself does not set harvest policy.</p>	
Forestry: Susitna Forest Guidelines (SFG)	It is vital that the SFG be retained as a strong management tool. If another management plan supersedes it, as suggested by the plan, the new plan should also have strong standards that manage timber harvest.	<p>DNR expects the proposed forest resources management plan* to address timber operations and management. Since the original SFG was adopted in 1991, the Forest Resources and Practices Act (FRPA) was amended legislatively, and regulations adopted to ensure protection of riparian areas and fish habitat from adverse impacts of timber harvesting. These regulations have made parts of the SFG redundant or unnecessary and it would be inappropriate to simply carry over the SFG without significant revision. It is intended that there be appropriate standards for forest management, including timber harvest, in the step-down plan. DNR expects the proposed forest resources management plan to address forest operations and management and similar topics included in the SFG.</p> <p>* The 2010 SMAP recommends the development of a forest resources management plan for areas designated Forestry. The purpose of this plan is to provide management guidance to DOF and DMLW for the large area covered by the Forestry designation.</p>	No change.
Forestry: Susitna Forest Guidelines (SFG)	The SFG have and are causing extreme difficulty for the state foresters to properly manage state forest resources. The guidelines must be eliminated and a more logical management system established instead.	See above response.	

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Forestry: Overlapping and redundant plans	There are many overlapping plans that are used for the management of forest resources. All these need to be incorporated into one single document and this document must be developed by foresters, not planners.	The ‘many plans’ that are referred to here in fact have been reduced in number already (through the adoption of the Southeast Susitna Area Plan) and it is intended that there be only two principal area plans for the Susitna Valley (Southeast Susitna and Susitna Matanuska) and a single forest management plan for this area.	No change.
Forestry: Restriction of Timber Harvests to Areas Designated Forestry	Why are timber harvests restricted only to areas designated Forestry? It is essential that wildlife habitat areas experience timber harvest in order to develop early succession deciduous vegetation to provide browse for moose and small game.	Timber harvests are not restricted to areas designated Forestry and can occur on state lands affected by a different land use designation since all state land is considered to be multiple use. The actual plan statement is: “Systematic timber harvest programs are to be conducted in areas designated Forestry.” However, it is appropriate to clarify the intent of this sentence so that it is not misapplied. Add as a footnote to this sentence the following: “ <i>Harvest activities related to habitat manipulation or to the management of overall forest health are exempt from this requirement.</i> ”	Revise plan; see Response.
Forestry: Timber sale on non-state land	The timber salvage guideline (management guideline B) should be changed to address the circumstance where a different entity than the state is the underlying landowner, in which case the state may not have the authority to sell merchantable timber.	Whether the state would be able to salvage timber in the right of way depends on the stipulations of conveyance in the patent from the state to the entity. In the instance of a right of way reservation, state land would, in effect, be retained and the state could harvest timber and receive the proceeds. However, if an easement is imposed, these usually only assure right of access or movement and in these instances the land owner would have the rights to the timber and would receive some compensation (timber or net proceeds).	No change.
In-Stream Flow Reservations	Review of the In-stream flow section of the PRD by ADF&G and DMLW Water Section indicated that certain changes of a technical nature need to be made to this section in order to more properly match with statutory requirements.	Concur; <i>replace current in-stream flow section with that contained in Appendix B.</i>	Revise plan; see Response.
In-stream Flow: In application streams	In application streams (i.e., Moose Creek in the Glenn Highway Region) should be added.	It is inappropriate to add in application streams as part of a 20-year plan since it may give a false indication. However, we agree that it is useful for the public to know the status of in-stream flow reservations. Accordingly, include reference to	Insert link to geodatabase.

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		the link to the water estate in Alaska Mapper, a DNR geodatabase: http://mapper.landrecords.info/Mapper/mainframe.jsp	
Material Sites: Protection of Riparian Areas	Enlarge buffers around to 300'. It is vital to protect streams from run-off.	The plan calls for the use of 150'; this amount is considered appropriate for the protection of riparian areas in most land use codes that require protection areas. (Actually, it is quite high in comparison.)	No change.
Material Sites: Reclamation Requirements	Reclamation is required following materials extraction. The SMAP should state that re-vegetation be in the form that develops into Alaska forest and species that support our wildlife.	Reclamation requirements are set by 11 AAC 97.250 and by DMLW Southcentral Region standards.	No change.
Material Sites: Impact Avoidance	Siting of material sites should avoid impacts to environmental resources and sensitive habitats, and to fish and wildlife populations.	Concur. The goal on p. 2-28 will be modified to read: "Avoidance or Minimization of Impacts. Material extraction sites are to be sited so that they avoid impacts, including but not limited to noise and dust, to adjacent residential or institutional areas (i.e., schools); <i>environmental resources and sensitive habitats; and to fish and wildlife populations.</i> "	Revise plan; see Response.
Material Sites: Coordination with land owners	Language should be added which encourages coordination with private landowners when reasonable to do so to facilitate cost effective development of material extraction sources.	Concur. Add as a goal: "Coordination. <i>When possible to do so, the state should coordinate with other landowners, including private land owners, to develop material supply sources. This goal particularly applies to material sites that are adjacent to each other but under different land ownership.</i> "	Revise plan; see Response.
Recreation: Recreational use of certain rivers.	Several of the rivers within the western and upper Susitna Valley are important for their recreational use and recreational value, but these aspects are not adequately described in certain of the management unit descriptions. This use (and value) needs to be recognized. It is also important that the state retain the land adjacent to these rivers in state	Several of the rivers in this area mention the importance of recreation use, but not all, and the need to maintain state ownership in all areas not intended for disposal is not explicitly stated, but should be. It would be appropriate to add the following management guideline to Chapter 2, Areawide Policies, in the section 'Recreation and Scenic Resources' to include these considerations. This management guideline should also note the possible addition of certain of these rivers as State Recreation Rivers.	Revise plan; see Response.

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	<p>ownership. These riverine areas provide important habitat corridors and are important for their recreational values. In those instances where other uses may occur that would result in possible conveyance out of state ownership, a large riverine buffer area needs to be protected. Additionally, certain of these corridors may be appropriate for addition as State Recreation Rivers.</p>	<p><i>I. Recreational Importance of Major Rivers.</i> State land adjacent to rivers that are important for recreation use, in addition to their habitat functions, are to be retained in state ownership within plan designations of Forestry, General Use, Habitat, Mineral, and Public Recreation. Where riverine areas are specifically identified by management unit (Skwentna, Hayes, Happy, and Kichatna Rivers in R-02) the area of this management unit is to be retained. In instances where a specific management unit does not exist, a minimum of width 300' is to be retained in those areas affected by Forestry, General Use, Habitat, Mineral, or Public Recreation designations adjacent to the Kahiltna, Chulitna, Susitna, and Yenta Rivers, and Peters Creek (as well as portions of the Skwentna, Hayes, Happy, and Kichatna rivers not within R-02). In areas where land may be conveyed out of state ownership (areas affected by the plan designations of Settlement and Agriculture), land within 200-300' of Ordinary High Water of the aforementioned rivers is either to be retained in state ownership or protected through a management buffer. (The amount of this buffer either to be a minimum of 200' or as specified in a management guideline.) Consult the requirements of the section 'Buffer, Easement, and Building Setback Widths' pp. 2-43 to 2-46 of 'Shorelands and Stream Corridors' for guidance and more detail.</p> <p>Certain river segments that have important recreation functions may be appropriate for inclusion as a State Recreation River (SRR), which is a Legislatively Designated Area. This plan does not make specific recommendations of this type, but, in general, areas of state land within the aforementioned rivers may be appropriate for consideration as a SRR, either as part of the revision of the Susitna Basin Recreation Rivers Management Plan or as a separate legislative action.</p>	
Settlement: Additional Land	This involves a number of issues: 1) whether there is a need for additional state	1. Land is currently available from a variety of entities, including the borough, Mental Health Trust, University of	No change.

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Sales	<p>land for settlement, 2) whether it is appropriate for additional land sales to occur in areas where sale have already occurred, 3) there should be a prohibition on additional land sales west of the Susitna River, and 4), the areas now designated Settlement should be re-designated to Habitat or Public Recreation.</p> <p>With respect to 1), there is questioning of why there is a need for additional sales when there is enough land on the market currently to more than meet demand and 2) there is the feeling that any additional sales would occur in areas that have significant habitat and/or hydraulic resources and thereby degrade these resources.</p>	<p>Alaska, and private individuals/entities. This land is not always available at the times that might be needed by the public and may not be available at desired locations. This is especially true of remote locations; there is little land owned by other entities than the state in the more remote locations and over time there has been a public demand for recreational properties in these areas.</p> <p>2. Many of the areas that the state has offered as land disposals in the past, especially those in remote locations, still contain a considerable amount of area that has not been built upon but may be suitable for development. To simply prohibit any additional sales would be too broad an action. It would disenfranchise those individuals that want remote locations and it assumes that development at any location at any time is inappropriate, which is a very doubtful assumption. With respect to the latter, there may be locations where development in certain of the remaining areas of prior disposals are wholly appropriate and would produce none of the impacts that are presumed to occur.</p> <p>To completely prohibit development is inappropriate and premature. A better approach is to identify specific issues and concerns for specific parcels and let the DMLW written best interest finding decision process make the final determination as to which areas to develop or leave alone.</p> <p>3. It is inappropriate to prohibit future land disposals as a blanket measure in the area west of the Susitna River. This is an immense area and to prohibit land disposals altogether is both inappropriate and premature, as explained in part in the response to item #2.</p> <p>4. It is not appropriate to re-designate Settlement throughout the planning area to Habitat or Public Recreation. The reasons for this are described in part in the responses to items 2 and 3. Equally important, area plans attempt to match designations with resources and neither habitat nor public recreation covers</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

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		the entirety of the planning area or the areas now designated Settlement.	
Settlement: Contact of Public	There needs to be a better process for contacting the public during the early phase of the scoping process where the go/no go decision is made on a land disposal.	We generally concur; this issue is now under consideration with the Land Disposal Section. Should such an approach be developed, it would occur sometime in the future and area plans do not speculate on what departmental programs may or may not exist in the future.	No change.
Settlement: Identification of past land disposals	There is no identification of the actual land disposals that have taken place since the approval of the SAP in 1985. The Resource Allocation Tables need to indicate the net/gross acreage that has been used and the amount that remains.	Our databases do not provide information of this type. However, an indication of how much land has been disposed of by the state within a given area can be determined in a general way through review of the plan maps of the area in question. The areas of disposal are outlined as polygons on these maps.	No change.
Settlement: State Land Bank	Why is the area plan proposing that over 686,000 acres of state land be allocated to settlement within the planning area while AS 38.04.020 only requires that 500,000 acres be provided for the settlement land bank? There seems to be sufficient land for this purpose already.	The requirement under AS 38.04.020(c) states that this land bank shall include <i>at least</i> 500,000 acres. Discretion is given to the Department to include additional acreage in the land bank if necessary, and we have found it necessary to do so. There are a variety of reasons for this: a larger inventory needs to be available so that there is flexibility in choice, settlement land demands exceed the requirements of 500,000 acres on a long term basis, and remote recreation land disposals require a very large amount of land area, with only a small amount of the land designated Settlement actually being used for that purpose, among other reasons.	No change.
Settlement: Misstatement of land designated Settlement.	It is inappropriate to say that the same amount of land is being allocated to Settlement in the 2010 SMAP compared to the 1985 SAP. The SMAP has considerably more acreage.	The amount of acreage in the 2010 SMAP is similar to the amount identified in the 1985 SMAP. The 2010 SMAP designates 709,500 acres, while the 1985 SAP designated 806,000 acres according to DMLW geodatabase records. (The 1985 SAP reported a gross acreage of 601,745, which included agricultural offerings and those that occurred in the spring of 1985).	The statement will be made in Management Guidelines under "Pacing" that "Less than 20% of the acreage allocated to settlement in the 2010 SMAP will be utilized within the planning period."

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		Although there is not a wide discrepancy in gross acreage, the 1985 SAP identified a net amount of acreage for settlement (108,390) during the planning period (p. 41), while the 2010 SMAP does not. The 1985 SAP explains that the smaller acreage figure is an estimated net acreage that would be developed. Our interpretation of this statement in the 1985 SAP (p. 167) is that this is an estimate of acreage that <i>might be developed</i> as against a prohibition of developing anything more than this amount. In fact, it is expected that less than 20% of the acreage allocated to settlement in the 2010 SMAP will be utilized within the planning period because of a variety of topographic, habitat, and environmental constraints.	
Settlement: Coordination with other landowners	Language should be added to encourage cooperation with private landowners in addition to local governments in order to facilitate rational development patterns.	Such language already exists (see lines 13-17, p. 2-35).	No change.
Settlement: Design Review Board	There should be a local design review board for state subdivisions and remote sales.	DNR uses an internal Design Review Board for its land sale projects and identifies important issues at that time, including even whether to proceed with a sale. Local input is provided through the review of the written Preliminary Decision. Community councils, in addition to other entities, are typically contacted at the time of this review.	No change.
Settlement: Identification of Access Corridors	The section, 'Ensure Access to Remote Settlements', can be improved by inserting management guidance language stipulating that access, in the shoulder and summer seasons (when snow cover and frost levels are not sufficient to protect the underlying vegetation) is prohibited across and near wetlands.	The DMLW Land Disposal program does not attempt to do this since. If such routes were to be identified it then becomes a management issue (people would almost certainly stray from the specified routes) and the region, which is responsible for the day to day management of state land, would be unable to effectively manage this activity if they were to be created because of staffing constraints and the absence of enforcement authority.	No change.
Shorelands and Stream Corridors: Protection of Riparian Area	Future subdivisions should not be established along streams or across wildlife movement corridors. Stream courses provide excellent greenbelts, wildlife	The blanket prohibition of any subdivision adjacent to any stream or wildlife movement corridors would, for all practical purposes, shut down the land disposal program. A number of streams can be expected in any large subdivision area in the	No change.

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	corridors, and places for recreation.	<p>remote portions of Susitna Valley, and the criss-crossing of these areas by these streams would preclude development.</p> <p>DMLW maintains that the standards contained in the Settlement (see Management Guideline C2) and Shorelands and Stream Corridors sections of Chapter 2 (see Management Guidelines B, D, F, and H) provide adequate protection of riparian areas and that a blanket prohibition on development is inappropriate and unnecessary. In addition, DMLW also intends to adopt specific standards for riparian protection as part of this division's written decision procedures.</p>	
Shorelands and Stream Corridors: Lakeshores	<p>The SAP required that the state retained at least 50% of the lake shore in a land disposal. The SMAP allows the disposal of all lake frontages with the exception of inlet and outlet streams. SAP standards should be used since they are more restrictive and better protect lake shore property and wildlife values.</p> <p>(Note: the SAP actually provides for the following, which differs from the comment in some respects: at least 50% of all public land within 500' of the lakeshore is to be retained on all lakes with significant recreation values. These percentages may be decreased or increased, depending on the context.)</p>	<p>The SAP used this standard in order to assure public access to a navigable lake; it was also designed to protect fragile lakeshore areas and wildlife values.</p> <p>Application of this standard has presented problems over time. In many cases the fragile areas that were supposed to exist did not, in fact, exist. The lakeshore was well vegetated and generally uniform in this respect. There was nothing fragile to protect. And while this standard ensured that a large portion of the lakeshore would be reserved for public access, such access can be provided on a more limited basis and still be effective.</p> <p>The revised standards provide for lake access, the protection of inlet and outlet streams, and the provision of a staging area for building materials and storage. This standard should provide the necessary public access. The protection of fragile lakeshore areas and wildlife values is more properly the function of subdivision design. Specific management guidelines exist in the plan (Settlement section) that guides such design in environmentally fragile areas. See Management guideline C(3) and D(4) in the Settlement section of Chapter 2.</p>	No change.
Shorelands and Stream Corridors:	The recommended standard (to protect 150' either side of an inlet or outlet stream) is	The recommended standard (of 150') is considered adequate to adequately protect these streams. In fact, the typical	No change.

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Increase in width of Inlet/outlet streams	inadequate. It should be increased to 300' in order to fully protect habitat.	requirement is to provide a protection area of between 100 and 150' and this is what is recommended in the riparian standards in this plan.	
Shorelands and Stream Corridors: Retain Lakes	The state needs to keep a number of entire lakes in public domain. These lakes are traditional Trumpeter swan and/or loon nesting sites.	While this might have been a viable option 25 years ago, the decision was made at that time (or before) that land adjacent to lakes was appropriate for development and was classified Settlement. Most large lakes in areas where remote settlement could reasonably occur were considered appropriate for development, and the land surrounding the lake was designated Settlement and land disposals followed. Since nearly all lakes that were suitable for residential development have been affected by this decision, the state lacks the ability to retain lakes in their original and cannot implement the recommended change.	No change.
Shorelands and Stream Corridors: Management Guideline D	Management guideline D, Protection of Land Adjacent to High Value Waterbodies, contains conditional and qualifying language, the effect of which is to provide no guidance at all.	<p>DMLW review of the management guideline does not reveal the conditional and qualifying language that is being referred to however, we do agree that additional language is appropriate to include to clarify when state land is to be retained and when it is to be protected through some other mechanism, and to also clarify that the values that are being protected in most riverine corridors include recreation.</p> <p>Modify Management Guideline D, 'Protection of Land Adjacent to High Value Waterbodies'. p. 4-41, to include the following at line 24:</p> <p><i>Certain of the streams within the upper and western Susitna Valley are important for both their habitat and recreation functions. Specific requirements pertain to the larger streams within this area in terms of the area to be retained by the state and/or to be protected through either an easement or setback. Consult Management Guideline I, Recreational Importance of Major Rivers in the Recreation and Scenic Resources section for specific requirements for these major rivers.</i></p>	Revise plan; see Response.
Shorelands: Public Access to	Retaining public rights-of-way to the ordinary high water is short sighted and does	DMLW follows the requirements of AS 38.05.127 and the specific requirements of 11 AAC 51.045 on 'along'	No change.

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Waterbodies	not adequately protect the public interests. The state should retain at least 1/8 th mile along all waterways to allow the public to enjoy 'their' water.	easements. The 50' width mentioned in 11 AAC 51.045 is a minimum that may be increased, with justification. Public access to a water body does not warrant the requested protection of 1/8 th mile.	
Shorelands and Stream Corridors: Table 2-1	Table 2-1 (which is used as an example of the leniency of SMAP toward environmental protection) has language that is either insufficient to protect the resource or is so conditional that it renders the buffers, setbacks, and other management mechanisms 'virtually discretionary'.	DMLW review of Table 2-1 does not reveal the inadequacies that are mentioned.	No change.
Shorelands and Stream Corridors: Revise chapter	This portion of Chapter 2 should be rewritten so as to provide adequate protection of stream and lakeshores in the Susitna Valley.	<p>We disagree. This section is similar to many other area plans as they relate to the protection of shorelands and stream corridors.</p> <p>DMLW review of the differences between the 1985 SAP and 2010 SMAP focuses on the different approach taken to the a) protection of lakeshore property, b) access to such areas, and c) in the area of protection (200') afforded riparian areas where the decision has been made that the riparian area is so significant that it requires protection through retaining the land in state ownership.</p> <p>DMLW response to the issue of lakeshores is given previously.</p> <p>Table 2-1 states <i>as a minimum</i> the protection of an area of 100-150' adjoining the stream, depending on stream type. (That is, the difference between the two approaches is about 50' in most cases, and this only applies when the area adjoining the stream provides a significant public benefit.) Our approach is similar to that applied to timber harvests under Riparian Standards, AS 41.17.119 (state land). The widths associated with Forest Resources Practices Act (AS 41.17.119) are based on extensive research conducted over many years and the compromises worked out under FRPA. It</p>	No change.

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		<p>is logical and appropriate for DMLW to use similar standards as the FRPA requirements.</p> <p>This standard is applied to both areas retained by the state as well as those to be conveyed out of state ownership; no such standard was specifically established in SAP for land to be conveyed out of state ownership, although it can be inferred that in cases where the land was to be ‘sold’ that a setback of 100’ should be established. In these cases, the amount of area protected under the 2010 SMAP is at least equal to and often greater than that provided under the 1985 SAP.</p>	
Shorelands and Stream Corridors: Streams are not protected.	At a public meeting held on the SMAP, the public was told that ‘all the streams aren’t classified, but that’s not a problem.’ This doesn’t seem right; it might result in someone harming an important stream.	Staff doesn’t recall making a statement like this. In any event, the migration, rearing and spawning portions of all anadromous streams are designated Habitat and given the protection implied by that designation. See Navigability section, p. 3-131, lines 34-36.	No change.
Shorelands and Stream Corridors: Streams are not protected	All salmon streams and lakes inhabited by salmon should be protected and appropriately designated. Having only some streams appropriately designated could lead to dangerous oversights in the future.	The migration, rearing and spawning portions of <i>all</i> anadromous streams identified in the ADF&G Catalogue of Anadromous Waters that are navigable are designated Habitat and given the protection implied by that designation. See Navigability section, p. 3-131, lines 34-36.	No change.
Shorelands and Stream Corridors: Width of protection area	All river and stream corridors should have a 300’ buffer instead of 200’ (p. 3-133). This is especially true of the Chulitna River corridor (from Broad Pass to Talkeetna); the wilderness quality of this river would be seriously diminished if settlement or mineral extraction reached into the riparian zone.	<p>(Note: the page reference does not mention riparian buffer widths; this page (3-133) identifies streams that are navigable and assigns a designation. This response will assume that the issue is the width of protection given the riparian area adjacent to the stream generally.)</p> <p>This plan’s approach is similar to that applied to timber harvests under Riparian Standards, AS 41.17.119 (state land). The widths associated with Forest Resources Practices Act (AS 41.17.119) are used; the widths identified in FRPA standards are based on extensive research conducted over many years and the compromises worked out under FRPA. It is logical and appropriate for DMLW to use similar standards as the FRPA requirements.</p>	No change to riparian management approach; however, increases in the protection widths for specific streams are recommended, below.

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		<p>In general, for smaller streams in the Susitna Valley, a width of 150' applies. This is considered a minimum width and widths greater than this can be applied if a significant public value is being protected (p. 2-43, lines 13-22). These larger streams in the Valley are typically assigned riparian protection widths of 200' and, more generally, 300'.</p> <p>This standard is applied to both areas retained by the state as well as those to be conveyed out of state ownership.</p>	
Shorelands and Stream Corridors: 100' buffer on <i>all</i> streams	A 100' riparian buffer should be applied on <i>all</i> streams irrespective of whether or not they have been identified as anadromous streams or lakes. (Emphasis added.)	<p>It is not appropriate to use such a standard since, in one small area there may be a myriad of streams, with the result that active use of state land (forestry, material sites, and settlement) would be effectively precluded because of the overlapping river buffers.</p> <p>The approach used in this plan is to apply a riparian protection standard to the larger streams that are navigable and anadromous. We recognize that this is a compromise solution to the problem of protection versus use, but it is one that is applied in other area plans on a statewide basis.</p>	No change.
Shorelands and Stream Corridors: Priority of Public Uses	This management guideline should include other public use values, such as habitat.	This issue is already addressed. See p. 2-40, lines 34-36.	No change.
Shorelands and Stream Corridors: ADEC	ADEC comments were inadvertently missed for inclusion in the Public Review Draft and several need to be incorporated: water quality should be considered as a public value in Management Guideline B, impervious surfaces within riparian areas should be minimized (Guidelines C and F), and impacts to water quality and habitat should be minimized by any construction within setbacks (Guideline H). ADEC permitting authorities should also be identified.	<p>Concur. Revise the Shorelands and Stream Corridor section to include the comments described in the Issue:</p> <p>Water quality should be considered as a public value in Management Guideline B, impervious surfaces within riparian areas should be minimized (Guidelines C and F), and impacts to water quality and habitat should be minimized by any construction within setbacks (Guideline H). ADEC permitting authorities should also be identified.</p>	Revise plan; see Response.

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Subsurface Resources: Map of coal, oil and gas, and mining closures	A map should be provided that shows the closures of each of these resources in the plan.	<p>DMLW is reluctant to identify the areas of closure for several reasons: 1) to do so at an appropriate scale would require an additional 11 maps and 2) closures come and go and inclusion of these in the plan captures only a moment in time and is therefore misleading when closures change.</p> <p>To resolve this issue, since the request is a reasonable one, this section of the plan includes a link into a DNR geodatabase that portrays these as they currently exist (Alaska Mapper).</p>	No change.
Public Access: Degradation of wetlands related to ORV Use	Extensive damage is being done to important and sensitive wetland complexes by ORVs. This problem occurs throughout the planning area and the plan needs to address this issue. SMAP needs to include policies similar to those in SAP that requires that the 'final plan' be written to point out the need for further work on this issue and include a management guideline like Guideline J, p.50, of off road vehicle activity.	<p>The SAP was written in the early 1980s and was adopted in June 1985. Perhaps at that time the problem was not as widespread and it was appropriate to recommend additional analysis into the problem. And at that time the constraints imposed by AS 38.05.200 did not exist.</p> <p>The two plan recommendations from the 1985 plan are either misstatements or cannot now be implemented because of constraints imposed through recent statutory changes. The first, that the final plan be written to identify this problem, does not make sense since the quote is from the <i>final</i> 1985 Plan. The second section refers to the use of special use land designations to restrict ORV activity. It is fine for a plan to state this but it is also misleading. Under AS 38.05.200, DNR does not have the authority to close areas to motorized use if a popular pattern of recreational use has been established. Most such areas in the planning area have had a long history of such use, and cannot be closed. For the 2010 SMAP to suggest closure without the accompanying regulations that are required for this type of action is disingenuous and such regulations cannot now be imposed on such a broad scale because of the constraints of this statute, which did not exist in 1985.</p>	No change.
Public Access: Need to preserve public access	Development of the area west of the Susitna River will eventually occur and roads will be necessary. The location of these roads is uncertain and will continue to be indefinite	<p>Concur. Include a new management guideline under General Public Access:</p> <p><i>"L. Preservation of Access Opportunities. The department</i> </p>	Revise plan; see Response.

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	until the location of the bridge crossing of the Susitna River is known and until specific development projects occur, which are usually associated with some form of resource development, either timber or mineral. It will be necessary to preserve access opportunities throughout this area in order to preserve the potential for the construction of road corridors.	<i>shall preserve potential access routes to developing areas. Unless there is an overriding state need, section line easements are to be preserved. It is likely that any road corridor that is developed in the western Susitna Valley will utilize section line easements as important components of this corridor. ADOT/PF is to be consulted prior to any action involving requests for the vacation of section line easements. Vacation requests should not be granted unless it clearly can be shown that there will not be a need for the section line for the foreseeable future (25 years) or if an alternative route is available of equal or better access."</i>	
Public Access: Access into the western part of the Susitna Valley	It is important that the state take a firm position on the appropriateness and need for access into the western part of the Susitna Valley (the area west of the Susitna River and south of the Petersville Road). This area, for it to develop, will eventually need a bridge crossing of the Susitna River and the development of a primary road system. The plan does not clearly indicate that the provision of access to and within this area is appropriate and because of this, it can be inferred that the plan, and therefore the state, does not necessarily support the development of such access.	It is the intention of the state to provide access to and eventually within the area west of the Susitna River. The development of this access requires, in large part, a bridge over the Susitna River, the location to be determined through standard environmental and plan review processes. Similarly, the state supports the provision of roads in this area, although the development of such a system will depend in large part on the provision of an initial road that accesses this area from the selected bridge location. Add to the Public Access goal statement on p. 2-50 the following statement: <i>"This plan views as appropriate the provision of access to and within the area west of the Susitna River and south of the Petersville Road. The development of this area will eventually require the installation of a bridge at a location south of the current crossing at mile 104 of the Parks Highway and the provision of a primary road accessing resource development in this area. Both are viewed as appropriate, the actual location of these facilities to be determined at a later time through specific bridge crossing and road corridor siting studies."</i>	Revise plan; see Response.
Public Access: Planning for public access in western Susitna Valley	The Public Review Draft does not mention public access requirements within the context of the Forest Resources Management Plan. If this plan is truly going	It is appropriate to modify the current description of the Forest Resources to include public access as a component and to identify public access issues (and solutions) based on changing demand for recreational access. Revise	Revise plan; see Response.

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	to be comprehensive it should include public access as an aspect of this planning.	<p>Management Guideline K in the forestry section of Chapter 2 to the following:</p> <p>“K. Development of Forest Resources Management Plan. A substantial portion of the planning area, totaling approximately 690,000 acres, in the Susitna Valley is classified Forestry in this plan. This area mostly occupies the more central parts of the Susitna Valley. These lands, under Title 38, are required to be managed in a sustained manner while providing for multiple uses and protection of the environment. Multiple uses include public recreation, <i>the maintenance of public access</i>, water resources, and wildlife/fisheries resources and their associated habitat. While this plan assigns a Forestry designation to this area and provides some management for timber harvest, it is largely silent on other aspects of the management of this large area. Given the importance of this area’s varied resources, DOF and DMLW, in consultation with ADF&G, will jointly prepare a forest resources management plan for this area in order for its resources to be more comprehensively and effectively managed, consistent with the concept of a ‘working forest’. <i>A component of this plan is to be related to the maintenance of public access throughout the planning area, with the idea of identifying access facilities related to changing demand for public access caused by changes in the type and level of public use, and to avoid the need for closures to public access or means of existing access. ... the Susitna Forest Guidelines.”</i></p>	
Public Access: Roadless Areas	The 1985 SAP had a guideline that called for the creation of roadless areas. (p. 50) Such areas would be designated by local government or the state and would be managed to exclude roads. This guideline should be included in the 2010 SMAP.	The 1985 SAP was developed prior to the enactment of AS 38.04.200, which occurred in 1997. The intent of this statute is to ensure the continuation of access by customary modes of access (motorized and non-motorized) to and within areas that have been used traditionally for recreation, commercial use, or mining. The effect of this statute is, indirectly, to preclude the establishment of ‘roadless areas’ where access to and within these areas has already occurred. Most areas fall under this standard and are therefore inappropriate as roadless areas. The only instance where such	No change.

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		areas may be established is in those places that have had no motorized use of a traditional type. There are few such areas within the planning region except for remote and inaccessible areas and it hardly makes sense to establish roadless areas in these locations since they are roadless as a practical matter.	
Public Access: Trails	The management guideline, 'Trails Within and Between Developing Areas' (pp. 2-52 and 53) does not recognize in the listing of trails those of regional significance. This type of trail exists and provision for it needs to occur.	<p>Concur. Add the following to the list of trails under Management Guideline C: <i>"If the trail is of regional or statewide significance or connects to a public open space system, it should be retained by the state."</i></p> <p>Add the following to Management Guideline D: <i>"Trails of regional or statewide significance on state owned land shall be protected by a publicly owned corridor that has a minimum width of 100' (50' either side of centerline). This buffer should be designed to protect the quality of the experience of the user and to minimize negative effects such as noise or dust. Buffer widths may be increased to minimize land use and ownership conflicts, protect the privacy of adjacent landowners, separate motorized from non-motorized uses, allow future siting of public facilities, or to adapt the trail to particular needs. Note: specific requirements pertain to the Iditarod Trail System."</i></p>	Revise plan; see Response.
Public Access: Trails	Do not designate the width of trails. Instead establish a right of way width of 150' and allow managers to determine the width of the right of way on a case-by-case basis.	Trail widths reflect function. A width of 150' is far in excess of what is needed.	No change.
Public Access: Trails – Need for Separate Section	The 1985 SAP included as a separate section an element on trails in Chapter 2. There needs to be a separate section, similarly, in the 2010 Plan that deals with trails of a purely recreational type. Trail management is a major issue on state land. The lack of mention of trails as a separate section in this chapter is a reflection that the state is not recognizing the importance of land management issues related to trails.	The format of DNR area plans has changed since the publication of the 1985 SAP. Trails are dealt with but in a more inclusive section within Chapter 2 entitled 'Public Access'. The decision was made some time ago that it made more sense to bring the various components of access that DNR is concerned with in an overall public access component. The fact that trails are dealt with in a larger access context does not mean that DNR does not view such facilities as important. Indeed, DNR has gone to great lengths to identify local and regional trails (in addition to RS 2477 routes) on a	No change.

Subject (page)	Issue	Response	Recommendation
		<p>parcel specific basis. Essentially all of the larger management units identify such trails and call for their protection.</p> <p>Moreover, comparison of the requirements related to trails in the 1985 SAP and the 2010 Plan will indicate that in most instances they are similar. However, the 2010 Plan also includes management guidelines specific to access within the planning area that are lacking from the 1985 Plan. See recommended changes to the Public Access section, above.</p> <p>Trail management is not appropriate for consideration in a management plan of this type. This issue is more appropriately addressed at the operational level.</p>	
Public Access: Goals	The current goals relate in general to public access but do not deal with trails specifically. Goals should be added that deal with trails specifically since this is such an important aspect of recreation and commercial movement in the western Susitna Valley.	<p>Concur. Add the following to the Goals listed on p. 2-50:</p> <p><i>“Local and Regional Trails. Participate in the development of local and regional trail systems that provide access to existing settlement areas, areas of historic mining activity, and that interconnect areas at a regional level.”</i></p> <p><i>“Trail Corridors. Protect or establish trail corridors to meet projected future use requirements as well as protecting future use.”</i></p>	Revise plan; see Response.
Public Access: Identification of Transportation Facilities	The plan does not provide sufficient detail on how access is to be provided throughout the more remote areas of the Susitna Valley. There is a need to better define the types and locations of transportation facilities within this area. How can the plan guide decisions involving timber harvest, mineral development, and land disposals without a management plan for transportation facilities?	<p>An area plan pertains to the allocation of uses and the management of resources on state land. It is not meant to be a transportation plan. ADOT/PF is responsible for transportation planning on a regional basis and for the development of the transportation facilities themselves. Moreover, DNR lacks the skills and resources to conduct the type of transportation planning that is required.</p> <p>That said, DMLW discussed this issue with representatives of ADOT/PF. There were several conclusions from that meeting: 1) That the selection of a bridge is the result of detailed analyses relating to trip demand and distribution, the relative advantages and disadvantages of specific bridge locations, and</p>	No change.

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		design issues related to the bridge structure itself. It is not possible for a site to be selected at this time and without a site, a road system for the area cannot be developed (except for incremental expansion from Petersville Road. 2) That the development of a primary road accessing this area is a function of some type of resource development, which cannot be predicted with certainty, and the siting of the primary road will be controlled in large part by the siting of the bridge. And 3) that the best interim approach is to reserve state section line easements for potential corridors. A recommended change in the plan will provide for greater assurance that these easements will be protected. (See previous response.)	
Public Access: Trespass on Private Lands	Language should be added to ensure that trespass on private lands does not occur as a result of settlement activities on state land.	The consideration of trespass occurs in the development of a remote sale or subdivision on state land already and additional requirements to assess the effects on private land are not required.	No change.

Chapter 3: Management Units

Subject (page)	Issue	Response	Recommendation
LINE BY LINE ANALYSIS			
3-27 Lns 1-2	The distinction between the Talkeetna community council boundary area and the Talkeetna Comprehensive Plan are inaccurate. The reference should be to the planning areas of the comprehensive plans.	Concur. Change the wording to “ <i>Also consulted were the two local comprehensive <u>plans that affect this management unit.</u></i> ”	Revise plan; see Response.
TOPICAL ANALYSIS			
Legislatively Designated Areas (LDA)	There are situations where the boundary of the State Recreation River may not provide an adequate buffer for the river itself. The recreation rivers within the planning area are Alexander Creek, Talachulitna River, Lake Creek, Talkeetna River, and Deshka River (Kroto and Moose creeks).	Those portions of these rivers where the 300 foot riparian buffer falls outside of the boundary of the LDA should be protected with a minimum of a 300 foot riparian buffer to protect the recreation and habitat values. In cases where the river’s ordinary high water mark is within 300 feet of the LDA boundary a 300 foot riparian buffer will be enforced in the adjoining unit of state land regardless of its land use designation.	Revise plan; see Response.
Land Use Designations: Primary v. Secondary Uses	There is only one designation now for state land whereas before primary and secondary uses were identified. This is detrimental to multiple uses. The same approach should be used in the 2010 SMAP.	Recent DNR area plans (since 2000) have tried to identify only a primary use rather than, as in previous area plans, which identified a variety of primary and secondary uses. This practice created confusion as to how a management unit was to be managed and what it is to be managed for. This problem was especially acute when the uses could be viewed as inconsistent with each other (i.e., Settlement v. Agriculture). The more recent plans generally only identify a primary use although co-designations do occur when two co-equal and compatible uses occupy the same area. This approach has made it easier to determine how to manage state land. The use of a single designation does not necessarily impair the potential to use state land for multiple uses. Under statute, all state land is available for use and can, in theory, accommodate a variety of even incompatible uses if stipulations are applied to deal with off-site impacts.	No change.

Subject (page)	Issue	Response	Recommendation
Navigable Waters	The plan should acknowledge that state designations and assertions as to the navigability of a stream may be disputed by property owners or by the federal government. Also, it should be noted that navigability does not usually extend upstream for the entire reach of the stream.	The plan does not go into the details of navigability at length; instead it provides a link to the state's navigability policy on the web. (p. 3-129, lines 29-30). This is a better approach than trying to account for all the quirks of state and federal navigability policies and interpretations in an area plan. It is also maintained on a continuing basis whereas the area plan is not. However, it is appropriate to include a reference to the state's map of navigable waters. This is available at: http://www.navmaps.alaska.gov/navwatersmap/	Add link to navigability map.
Navigable Waters: Buffer Widths of particular streams	The following streams should have a stream buffer of 300'; these areas need particular protection since they have considerable current recreational use and there is a need to separate the riverine area from the area of land disposals: Chulitna River, including the East and West Forks, Peters Creek, Kroto Creek, Kahiltna River, and Moose Creek, Yenta River, and Skwentna River.	Generally concur; those rivers that are mentioned and are not part of a State Recreation River should be affected by a 300' protection area to protect the recreation and habitat values. (Moose and Kroto Creeks are part of SRRs and are not affected by this requirement.)	Revise plan; see Response.
Navigable Rivers and Lakes	Moose Creek (near Palmer) and Fish Lake (near Chickaloon) are incorrectly listed in Table 3-1 Navigable Streams and Creeks and Table 3-2 Navigable Lakes.	Agree that clarification is needed.	The table will be clarified to specify that Moose Creek refers to the creek west of the Susitna River and Fish Lake refers to the lake near Talkeetna.
REGION/PARCEL ANALYSIS			
All regions			
Public Access: Foot travel	It is important that access by foot be noted in the section 'Access, Resources, and Uses of State Land' that is included in the introductory part of each region.	Concur. <i>Mention foot travel where it is known to occur.</i>	Revise plan; see Response.
Land retained by state	"Retain in state ownership" is noted in the Resource Allocation Table for some units but not others, although the management	The management intent to retain land in state ownership is part of the definition of many of the land use designations found starting on page 3-5. For example, the definition of the	No change.

Subject (page)	Issue	Response	Recommendation
	intent is to protect recreation and habitat. This language should be added to more units if that is the intent.	“Habitat” land use designation includes the statement that: “Land designated Habitat is intended to remain in state ownership...” The same goes for the Public Recreation designation.	
Management Summary related to Forest land	In some regions the Management Summary includes a statement that forestry will be guided by the Susitna Forestry Guidelines. This should apply to all of the forest land in the Susitna Valley.	Concur.	The following statement will be added to the Management Summaries in Chapter 3 for all regions with land designated for Forestry: “The management of areas designated Forestry will be guided by the Forest Resources and Practices Act; Susitna Forestry Guidelines, or its successor; and this area plan.”
North Parks Highway			
N-09	Land disposals in this unit should provide for public campsites and rest stops along the Chulitna River Corridor.	<p>If provided, public campsites and rest stops would necessarily adjoin the Chulitna River. There is a 300’ protection buffer that affects development activity so provision of such facilities as part of a subdivision would not occur – that is, the subdivision would be set back at least 300’ from the river.</p> <p>The Chulitna River and adjoining state uplands are co-designated Public Recreation and Habitat and therefore there is nothing in the plan that would constrain the development of these facilities, however.</p>	No change.
South Parks Highway			
S-11	A number of parcels that are now identified as Agriculture should not be developed for this purpose. Agriculture at these locations would not be economically profitable because of the poor quality of the soils and the remote location. These soils are very acid and there is a minimum amount of top soil.	<p>NRCS soils information indicates that the soils in this parcel are suitable for agriculture. This parcel, while somewhat remote from Talkeetna, is relatively close to a community and a developed road system.</p> <p>One of the goals of this plan is to retain as much agricultural land as possible, and we are reluctant to remove parcels from this designation, particularly given the conditions noted above and that this area has been classified agriculture for at least 25 years.</p>	No change.

Subject (page)	Issue	Response	Recommendation
S-11	Commenter believes that it is prudent to protect agricultural land from settlement or other uses that would make them unusable for growing crops in the future. This land should be put in an agricultural bank and not sold until there is a need for agriculture and access is available.	The issue of an agricultural land bank is addressed in a response to comments for such a mechanism in the topical responses to Chapter 2.	No change.
S-14	A number of parcels that are now identified as Agriculture should not be developed for this purpose. Agriculture at these locations would not be economically profitable because of the poor quality of the soils and the remote location. These soils are very acid and there is a minimum amount of top soil.	<p>NRCS soils information indicates that the soils in this parcel are suitable for agriculture. This parcel, while somewhat remote from Talkeetna, is relatively close to a community and a developed road system.</p> <p>One of the goals of this plan is to retain as much agricultural land as possible, and we are reluctant to remove parcels from this designation, particularly given the conditions noted above and that this area has been classified agriculture for at least 25 years.</p>	No change.
S-14	Commenter believes that it is prudent to protect agricultural land from settlement or other uses that would make them unusable for growing crops in the future. This land should be put in an agricultural bank and not sold until there is a need for agriculture and access is available.	The issue of an agricultural land bank is addressed in a response to comments for such a mechanism in the topical responses to Chapter 2.	No change.
S-24	This large parcel (32,469 acres) is not appropriate for additional land disposals. There is enough land in other areas, including borough land to the west, to satisfy the demand for residential land. Moreover, the Talkeetna Comprehensive Plan states that no new disposal or subdivision of public lands in remote areas should be permitted until there is a demonstrated need for additional residential land.	<p>This unit has been classified Settlement for over 25 years and there have been a large number of land disposals already. It is not the policy of the department to classify an area into a different use classification if the area has experienced land development already.</p> <p>The state is not subject to the Talkeetna Comprehensive Plan. It is not in the state's interest to completely preclude development within this management unit. It is our policy to determine whether additional land disposals within a given area should occur based on the conditions that exist at the time when potential development is under consideration. At that</p>	No change.

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		time DNR can address the issue of whether additional land disposals are warranted. They may or may not be warranted but it is preferable, in our opinion, to base this determination on the facts that are specific at the time of decision.	
S-34	This parcel has an anadromous stream and allowing a material site near the south fork of Montana Creek is inappropriate. Recommends that the ILMA be retired or relocated to land somewhat more accessible and less valuable from a habitat perspective.	Parcel has been affected by a long-term ILMA with ADOT/PF for the purpose of extracting gravel and rip-rap for nearby roads. The ADOT/PF wants to continue the use of this area for material extraction and, once an ILMA has been issued, DNR does not extinguish it unless requested by the agency responsible for managing it.	No change.
Petersville Road			
Access	Trail access in this region was incompletely characterized as “Numerous trails also access this region with many oriented north/south to accommodate the predominant drainage pattern, skirting wetlands in summer and utilizing frozen wetlands in winter.” This fails to acknowledge the many east/west trails and the fact that many trails go directly on the wetland rather than skirt them.	Concur.	Add to this section the statement: “There are also many trails, oriented in all directions, that go directly on the wetlands and are often braided.
Management constraints	The Denali State Park Management Plan, South Denali Implementation Plan (with areas identified for recreational enhancements), and Petersville Road Corridor Management Plan should be mentioned under Management Constraints.	Concur. There are roadside facilities recommended in the South Denali Implementation Plan. These include parking areas and campgrounds along the Petersville Road that should be evaluated during the design of land disposals so that appropriate areas can be reserved.	The three plans will be listed under Management Constraints and the Resource Allocation Table will be amended under Unit P-04 to state that areas will be reserved to accommodate facilities identified in the South Denali Implementation Plan.
Riparian buffer	Numerous streams in this region support not only anadromous fish but have important wildlife and recreation values that warrant an increased buffer.	Partially concur. Buffers should be increased to 300 feet on Peters and Trapper creeks and the Kahiltna River. This issue is dealt with in the navigable waters section of this Issue Response Summary. Other than these streams, the requirements for riparian area protection in Chapter 2 are considered sufficient.	Revise plan; see Response.

Subject (page)	Issue	Response	Recommendation
P-01	The portions of P-01 south and east of Swan Lake, west of unit P-03, and north of unit P-06 are important habitat for anadromous fish, waterfowl and other species. These areas are also heavily used for hiking, skiing and snow machining. Designation is more appropriately habitat or public recreation.	Partially concur. Agree that the area south and east of Swan Lake has a use pattern similar to the lakes and streams in P-03 and should be added to that unit. The other areas lack these same values and should retain the Settlement designation.	Unit P-03, which is designated Public Recreation-Dispersed, will be expanded north to encompass this area. The co-designation of Habitat will also be added to P-03. Expansion area is bounded on the west by the northward extension of the section lines that form the west boundary of Unit P-03; on the north by the borough land around Swan Lake and Denali State Park; and on the east by Trapper Creek. In the management intent for Unit P-01 Trapper Creek will be given a riparian buffer of 300 feet.
P-01	The area south of Swan Lake appears to contain Native cache pits and field studies should be undertaken before any site disturbance.	This area will be removed from the Settlement unit P-01 and retained by the state.	See above for delineation of area to be added to unit P-03.
P-04	Peters Creek is important for wildlife and recreation and should have a 300 foot buffer.	Concur. Due to the recreation and wildlife values present along Peters Creek the buffer will be increased to 300 feet.	Buffer will be increased to 300 feet.
P-04	The scenic buffer along Petersville Road should be increased to 300 feet.	The present 150 foot buffer is measured from the edge of the right-of-way. This exceeds the 100 foot easement from the road centerline that is recommended in the Petersville Road Corridor Management Plan and should be adequate to protect the resource.	No change.
P-04 and P-05	Portions of these units should be redesignated to Habitat to buffer the Kroto Creek State Recreation River.	The corridor established by legislation for the Kroto Creek Recreation River is generally protective of this resource. To ensure a minimum buffer for those stream segments that may meander close to the boundary a 300 foot buffer will be applied to Kroto Creek.	Establish a 300 foot riparian buffer on Kroto Creek. See issue above under the subject Legislatively Designated Areas.
P-07, P-17, and the northernmost and southernmost parcels in Unit P-12	These units are inappropriate for agriculture due to negative impacts to the watershed. There are extensive wetlands in these areas and pesticide and fertilizer runoff will harm the anadromous streams.	While there are wetlands in this unit, as you can expect when looking at any large unit of land in the Susitna Valley, there are also good agricultural soils. Explicit management intent for this unit is to protect the anadromous waters. Potential negative impacts will be mitigated during the design of the	No change.

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		agricultural land sale and using the guidelines found in Chapter 2.	
P-09	This unit is comprised of several material sites that contain agricultural soils. Could the area outside of the present gravel pit be redesignated to agriculture?	While the sites may have only a limited developed area at present, they are meant to secure a long term supply of gravel for future road building or other infrastructure needs. ADOT/PF holds an ILMA for most of these sites and foresees the potential need for the entirety of these sites.	No change.
P-13	The recreation and habitat values in this unit far outweigh forestry values and justify a change to a designation of Habitat or Recreation.	Part of the goal in managing these lands for forestry is to diversify the habitat in this region and provide more recreational opportunities. The plan designates some land for Habitat or Public Recreation to provide natural undisturbed areas. This unit was designated Forestry to be actively managed for the timber resource while still providing for recreation and habitat. This is accomplished through the guidelines found in Chapter 2.	No change.
P-13	The important anadromous streams in this unit, including the Kahiltna River, Peters Creek, Bear Creek, and the tributaries to Kroto and Moose creeks, need larger buffers.	Partially concur. Due to the recreation and wildlife values present along the Kahiltna River and Peters Creek the buffer will be increased to 300 feet.	Increase buffer on Kahiltna River and Peters Creek to 300 feet.
Blair Lake State Recreation Area	The Blair Lake State Recreation Area (BLSRA) does not have a land use designation.	Concur.	The BLSRA will be Unit P-20 with a land use designation of Public Recreation-Public Use Site. Management Intent will state to manage this 400 acre parcel for recreation pursuant to ILMA ADL 225371 with Division of Parks and Outdoor Recreation. Retain land in state ownership.
Sunflower Basin			
B-04	This parcel should be designated Minerals.	Parcel occupies a large area and is characterized by high habitat and water resource values. This area is not considered high in mineral potential either. Should mineral development be necessary within this unit, it can still occur in an area designated Habitat.	No change.

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Susitna Lowlands			
U-18	Unit boundary should be reconfigured to better match the agricultural soils found in this area.	Concur. Northern sections of U-18 will be added to U-16; and U-18 will expand eastward into sections of U-01, U-04 and U-16. U-01 is designated Habitat/Water Resources and to protect these values a 300 foot riparian buffer should be retained on major waterbodies in that portion that was added to U-18. U-04 is designated Forestry and to develop that resource a north-south transportation corridor through U-18 should be retained to connect to the Susitna River. The Division of Forestry should also be permitted to harvest the timber from parcels prior to their conversion to agricultural use.	Revise boundary; see Response. Add the following text to the Management Intent for U-18: <i>“A minimum of 300 foot riparian buffer will be retained in state ownership along Whitsol Lake and Kroto Slough. Prior to any land sale in the eastern two sections of this unit, a minimum 100 foot right-of-way will be retained by the state providing access between northern unit U-04 and the Susitna River. The Division of Forestry should be permitted to harvest the timber from parcels prior to their conversion to agricultural use.”</i>
Mount Susitna			
M-15	This unit is to be managed for general uses with an emphasis on protection of the streams, creeks, and the natural environment. Why not give the parcel a more specific intent like habitat or shorelands and stream corridors.	Review of the Resource Allocation Table and its corresponding plan map (3-8) indicates a significant discrepancy: the RAT identifies the unit as General Use while the map depicts the parcel as Settlement. The RAT is correct and the map is in error. Change Map 3-8 to depict this unit as General Use. This unit surrounds an existing subdivision at Trinity Lake but is not properly a Settlement unit since there is no good land for development for residential purposes landward from the lake. Neither is it appropriate to designate it Habitat since it does not possess the characteristics of parcels designated Habitat in this plan. General Use is the proper designation, with management intent to protect the creek that is linked to the lake.	Revise plan; see Response.
M-17	This parcel has limited access and only by snow machine during the winter. There are two established trails for access. There is no lake or stream to land on and there is only	This unit occupies forested, fairly flat terrain adjoining the riverine area of Wolverine Creek. It is considered suitable for remote settlement, although it is appropriate to include some of the factual information that is mentioned in the Issue in the	No change except to include factual information in the ‘Description’ part of the RAT in the final plan.

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	the private runway. This is a prime moose calving area and Wolverine Creek is a king salmon spawning drainage. Brown bears fish this creek. Low level military flights are frequent.	'Description' portion of the Resource Allocation Table, including trails access, the existence of a moose calving area, the presence of brown bears seasonally, and frequency of military flights. This information may be useful in determining whether this unit is appropriate for land disposals, and if so determined, the need for the use of certain stipulations.	
M-24	Where is the riparian buffer to be applied? Be specific.	Concur. The intent is to impose riparian buffers on anadromous streams, but this is not stated. Add language that indicates that buffers are to be applied to anadromous streams. Note: this change is to also apply to similar text in the plan.	Revise plan; see Response.
M-25	This parcel seems to lack the specification and/or justification that the other units have detailed in the management intent sections.	The management intent section is purposely short. This is a previous state subdivision and further development of the remaining land (tracts) within this subdivision is inappropriate. There is really nothing more to say than this.	No change.
Alaska Range			
R-01	The management intent for this parcel states that it is to be managed for multiple uses with an emphasis on the protection of streams, creek, and general environmental habitat. Why not give the parcel a more specific intent like habitat or shorelands and stream corridors.	The management intent as stated in the Resource Allocation Table for this parcel does not indicate a preference for environmental protection. Rather, it indicates that the parcel is to be managed for multiple uses and with management intent to protect trails, easements, and anadromous streams with riparian buffers. The parcel is appropriately designated General Use. No change is warranted.	No change.
R-02	The recreation importance of this river is not described and the plan does not include a plan co- designation of Public Recreation or management guidance relating to recreation.	<u>Concur.</u> This unit should be codesignated Habitat/Public Recreation and management intent revised to: "Manage unit to protect its habitat, hydrologic, and recreational values."	Revise plan; see Response
Glenn Highway			
Access, Resources and Uses	This section should mention the major state projects: ADOT/PF highway realignments, ANGDA gas pipeline and coal leases.	Partially concur. The Alaska Natural Gas Development Authority (ANGDA) gas pipeline is a potential major project located in this region and deserves mention. Active coal leases are already mentioned. Highway realignments, while they represent a major project, really don't change the stated	The following statement will be added to this section: "The Alaska Natural Gas Development Authority (ANGDA) has a conditional right of way lease for a gas pipeline connecting Palmer to Glennallen.

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		fact that the Glenn Highway is the primary access to the region, as well as a scenic feature.	This is a large project whose effects would be studied through an environmental impact statement.”
Access, Resources and Uses	This section should mention that the Matanuska River has issues of land erosion, recreation access and wildlife habitat and the Mat-Su Borough is completing a “Matanuska River Management Plan” to address these.	Partially concur. This section already mentions the recreation access and wildlife habitat. However the erosion issues associated with the Matanuska River deserve mention and will be included in the Resource Allocation Table. Also see next Issue-Response.	Add language to the Resource Allocation Table Unit G-08, which includes the Matanuska River, stating the river’s highly erodible nature. Management intent will be added to minimize erosion impacts and that further guidance can be found in the Matanuska River Management Plan (a joint effort of the borough, state and other agencies).
Management Constraints	The Matanuska Valley Moose Range Management Plan, Matanuska River Management Plan, and MSB Code 17.27: Sutton Special Land Use District should be mentioned here.	Partially concur. While the two management plans should be listed under management constraints, the MSB Code is the implementing ordinance for the Sutton Comprehensive Plan which is already mentioned in this section. The code will therefore not be cited.	List the Matanuska Valley Moose Range Management Plan (a 1986 plan in need of revision) and Matanuska River Management Plan (a plan near completion in 2010) under Management Constraints.
Designations within the Matanuska Valley Moose Range (MVMR)	The designations of Coal/Habitat for the MVMR does not match the actual use for all parts of this LDA. As an example, some areas are closed to coal leasing.	The legislation establishing the MVMR called for the area to be managed for many uses with a management plan providing detail. The Coal/Habitat designation is meant to capture just two of these and the reader is referred to the 1986 MVMR Management Plan to find management intent for this unit. The Resource Allocation Table for this unit does mention that this unit is open to coal and mineral development but fails to mention that there are a few areas covered by a Mineral Closing Order.	Amend Resource Allocation Table to state that there are Mineral Closing Orders affecting a small portion of this unit.
G-04	Description should include rehabilitation and reopening of closed campground at Moose Creek in collaboration with MSB and Chickaloon Village Tribal Council. Also note restoration of fish habitat along Moose Creek with private, state and federal agencies.	Concur.	This description will be added to the Resource Allocation Table.

Subject (page)	Issue	Response	Recommendation
G-18	Land sales may create access issues (trailhead parking) along the highway in this and other Settlement units.	Guidelines to provide trailhead parking areas are found in Chapter 2- Settlement and will be implemented during the design of the land sale.	No change.
G-09	Since these parcels, designated for Settlement, abut the Matanuska Valley Moose Range ADF&G should be consulted to preserve access.	Agree that preservation of public access is important and the Resource Allocation Table should include management intent stating that “ADF&G should be consulted to identify and protect public access through these parcels.”	Change as stated in Response.
G-20	The Sheep Mountain Dall Sheep and Mountain Goat Preserve (SMDSMGP) is an area closed to hunting to protect the sheep and goat populations unique to this area. However, there is no protection afforded the habitat, which is currently at risk.	Concur.	Mention the SMDSMGP in the Resource Allocation Table and add Management Intent stating: “Note that the sheep and goat populations are protected within the SMDSMGP. Protect the associated habitat. Any authorizations must avoid or mitigate impacts to the sheep and goats and their habitat. If degradation of the habitat results from certain uses DNR will consider management constraints on those activities.”
G-21	Access corridors should be established in these Settlement units.	Agree that preservation of public access is important and the Resource Allocation Table should include management intent stating that “ADF&G should be consulted to identify and protect public access through these parcels.”	Change as stated in response.
G-23	Access corridors should be established in these Settlement units.	Agree that preservation of public access is important and the Resource Allocation Table should include management intent stating that “ADF&G should be consulted to identify and protect public access through these parcels.”	Change as stated in response.
Talkeetna Mountains			
Local Comprehensive Plan	The local comprehensive plan is not mentioned.	It is mentioned as a local ‘comprehensive plan’.	No change.

Chapter 4: Implementation and Recommendations

Subject (page)	Issue	Response	Recommendation
Legislatively Designated Areas	Several rivers within the upper and western Susitna Valley may be appropriate for designation as a State Recreation River, a legislatively designated area. The plan does not reference this, but should.	<p>It was not intended that this plan make recommendations for additions to the State Recreation Rivers (SRR) in this area. It is more appropriate that this take place in the scheduled update of the Susitna Basin Recreation Rivers Management Plan. Nonetheless, it is appropriate to note that certain of the major rivers in this area perform a recreation function and may be appropriate for inclusion as a SRR, either through the update of the aforementioned plan or as a separate legislative act. Accordingly, add the following at line 15 under Legislatively Designated Areas on p. 4-10:</p> <p><i>“Several of the major rivers in the western and upper Susitna Valley have, in addition to their habitat and fisheries values, important recreation uses and recreational values. These are not now designated a State Recreation River, a legislatively designated area as defined in AS 41.23.400-510, but they may warrant such designation. Consideration should be given to the inclusion of some of these river segments as a SRR, either in the update of the Susitna Basin Recreation Rivers Management Plan or as a separate legislative act.”</i></p>	Revise plan; see Response.

Glossary

Subject (page)	Issue	Response	Recommendation
Anadromous Waters: Definition	<p>The definition used in the plan does not account for the migration or rearing phases (it only lists ‘spawning’) of anadromous fish, does not include all anadromous fish, and does not include other sources of information that can help in determining if a stream is anadromous. The current definition references the ADF&G Catalog of Anadromous Waters, which does not include other anadromous streams that may occur within the planning area.</p> <p>Commenter suggests adding ‘other water body’ and ‘rearing and migration’ to the current wording, stating that not all anadromous streams are included in the Catalog, and that other entities or individuals may have knowledge of an anadromous stream.</p>	<p>Generally concur. The Catalog identifies all parts of anadromous streams and most of our adjudications are only concerned with whether the stream is anadromous or not. Accordingly, adding ‘rearing’ and ‘migration’ is appropriate as is the wording ‘other water bodies’. It is also appropriate to acknowledge that there are other anadromous streams that may exist in the planning area and that may not be identified in the Catalog. We do not agree that the definition should be modified to indicate that other sources of information may exist that would be able to confirm the presence. DNR relies upon ADF&G for the determination as to whether a water body is anadromous.</p>	Revise definition of ‘Anadromous Waters’ to include the changes identified in Response.
Anadromous Waters: Inclusion of Fish Species	Anadromous waters should include all anadromous fish species, not just salmon.	<p>The Catalogue of Anadromous Waters is based upon and depicts fish species that conform to the following definition: “Anadromous Fish means a fish or fish species that spends portions of its life cycle in both fresh and salt waters, entering fresh water from the sea to spawn and includes the anadromous forms of pacific trout and salmon of the genus <i>Oncorhynchus</i> (rainbow and cutthroat trout and chinook, coho, sockeye, chum and pink salmon), Arctic char, Dolly Varden, sheefish, smelts, lamprey, whitefish, and sturgeon.”</p> <p>This is an inclusive definition and expansion of the definition is unnecessary.</p>	No change.

Other (Not Otherwise Covered)

Subject (page)	Issue	Response	Recommendation
Wetlands	The SAP requires the retention of what are termed Class I and Class II wetlands. Class III are to be evaluated on a case-by-case basis and be retained or not, depending on the context. The SMAP only states that wetlands are to be avoided adjacent to streams.	<p>When the SAP was developed a rigorous national permitting system for wetlands did not exist, or at least was only partly applied in Alaska. SAP developed specific definitions of wetland and imposed certain requirements for protection.</p> <p>A rigorous national wetland program now exists and is the basis for decision making on wetlands in Alaska. This system is well known and is required on nearly all projects that may affect wetland areas. It does not make sense to have a duplicative program when an effective (and mandatory) program now exists. To do so would create additional unnecessary work and create confusion between the roles and outcomes of the two systems.</p>	No change.
Wetlands	Given the importance of wetlands in the SMAP planning area, there needs to be a more detailed discussion of these features and a better indication as to how these features will be protected.	<p>Wetlands are defined in the 2010 Plan and are identified if they exist in a management unit, but there is no specific component in Chapter 2 that deals with these features.</p> <p>The previous discussion (see above) is germane to this more specific issue as well. The reality of wetlands management is that the decision on the protection of these features is made through national, general, or individual permits administered through the US Corps of Engineers. There is no point in this plan trying to determine the requirements for wetlands protection if a system for decision making is in place and if this system does not take into account a management plan like the SMAP. (It doesn't.) Wetland decisions are made on a site specific basis following federal criteria.</p>	No change.
Pipelines	A gas pipeline may need to be constructed through portions of regions west of the Susitna River. The SMAP is not the appropriate vehicle for the designation of	While not strictly necessary, a statement to the effect that pipelines may need to be constructed in one or more of the regions west of the Susitna River can be added without harm to the plan. This revision would also indicate that there is	Revise plan; see Response.

Subject (page)	Issue	Response	Recommendation
	pipeline corridors (this is the function of more detailed studies) but it is appropriate to include a statement in the plan that recognizes the potential for pipeline right of way and that nothing in the SMAP prohibits such facilities.	nothing in the plan that affects the placement of such facilities directly. The affected regions would be Mount Susitna, Alaska Range, and Susitna Lowlands.	
General Use Lands: Separate section within plan	There are many areas that are designated General Use land; because the amount is so large, this designation should have its own section in the plan, with management guidelines.	<p>While we agree that the amount of land allocated to General Use is significant, it is inappropriate to treat the General Use designation as a type of land use or resource, similar to other uses and resources in Chapter 2. This is a designation, not a use or resource and therefore is inappropriate for inclusion in this Chapter 2.</p> <p>Management intent and management guidance are provided for lands designated General Use, but in the context of individual management units.</p>	No change.
Issue Response Summary	DNR did not develop an issue-response summary of the initial scoping process like the borough does. One should have been provided.	DNR develops an issue-response summary but does so at the time of the Public Review Draft. We prepare it at that time since this is when the formal recommendations of the department are made known to the public. Until then there is nothing really for the public to respond to.	No change.
Plan Format	The plan has too much detail and there are too many land classifications.	<p>Area plans are required to meet the requirements of AS 38.04.065 and 11 AAC 55, and must, at a minimum, be consistent with these standards. Plan format and length are dictated by these requirements, which are extensive.</p> <p>The number of land classifications is established in 11 AAC 55.040 and area plans must be consistent with these definitions to the extent that there is a general correspondence between the land use classification and the underlying resource or use that requires management.</p>	No change.
Various	Numerous errors and omissions and points of clarification were made.	The final plan will correct all errors and omissions of a technical nature.	Revise plan; see Response.