

**Issue:** U-23 to Public Recreation or Habitat, to protect the historic recreational use of the Bullion Mountain Scenic Area and to follow the guidelines of the Deception Creek Land Use Plan.

**Department's Response:** This issue is similar to an Individual comment that U-23 should be retained in its current designation of Wildlife Habitat/Watershed and was addressed in the IRS on Page 34, Row 3 and the recommendation was no change to the plan.

I have reconsidered my original decision to change the designation of this parcel to Settlement because I agree that the public value for public recreation and habitat in Unit U-23 rise above the value for development and future land disposal. Accordingly, **I am granting your request for reconsideration in part on the land classification of U-23, and Unit U-23 will be designated as Habitat (Ha) and will be merged into Unit U-13.** Unit U-13 is designated as Habitat in the SSAP. Under the Habitat designation, this parcel will remain in state ownership and “maintained in an undisturbed, natural state except for improvements related to public health, safety, habitat restoration or rehabilitation, and public recreation,” as defined on pages 3-5 and 3-6 of the SSAP.

Also, **I will amend the Resource Allocation Table for Unit U-13 to mention that the Bullion Mountain Scenic Area is within this parcel and recreation and trail access will be protected.**

**Issue:** Of special concern is the Southeast Susitna Area Plan-Public Review Draft, Issue Response Summary dated April, 2008. The response under-Coordination (Pages 2-4) where the recommendation indicates local community area comprehensive plans can make recommendations but may not establish land use designations or other planning requirements for state lands within their areas. Although this will always be true, (state plan trumps local plans as this is state owned), it is of the utmost importance to incorporate the communities input from the content of the current Comp Plan during the State plan revision period (bulk of April 10th letter). This is the point!!! Then the State Plan can incorporate the vision of the residents who will be "living" with the ramifications of the State Plan contents for 20-25 or more years (depending on when they decide to do this again).

**Department's Response:** The IRS adequately addressed Coordination with local plans on Page 6, Rows 4, 5, and 7 and Page 7, Row 1. On Page 6, Row 7, in response to a comment from the Matanuska-Susitna Borough (MSB), the plan was revised to add the Management Guideline titled “Authority of State Plans” to address the relationship between state and local plans. See page 1, Approved Revisions, Coordination, 2-4. DNR has the sole responsibility to manage state lands and does so with consideration of not only local but also state-wide issues and interests. Thus, DNR cannot cede its management authority over state lands to local communities.

DNR's review implies meaningful consideration of local land use plans but state law does not require compliance with them. AS 38.04.065, Land use planning and classification, describes the type of consideration the state gives to local plans when adopting or revising regional land

use plans such as the SSAP. Subsection (g) states: “Each land use plan adopted by the commissioner under this section shall be consistent with municipal land use plans to the maximum extent determined consistent with the state interests and the purposes of this chapter.”

**I will revise the SSAP to add the following text at the end of “Authority of State Plans” on page 2-4 (Coordination and Public Notice): “See AS 38.04.065.”**

**Issue:** The Issues Response Summary says that it will change in the plan that the Annual Allowable Cut (AAC) and Sustained Yield calculations for timber harvest will be based on the addition of General Use Lands along with Forestry classified lands. This should be reconsidered. Basing the AAC on both Forestry and General use Lands could increase the AAC in an unacceptable way i.e. increasing the AAC to the point that it is too high for sustained yield. AAC calculations should only be based on designated Forestry Lands.

**Department’s Response:** Land classified as general use land is land that the plan identifies for retention in state ownership and unless specifically prohibited is available for timber harvest. DNR as a matter of practice and policy has included General Use land in the AAC calculations. The 1991 Susitna Forestry Guidelines (SFG) include some General Use land in the AAC (less than 10%). The SSAP also has some General Use land with Forestry as a designated use but, again, it represents less than 10% of the area involved in the AAC. While specific future land use has not been finalized in these units, it is intended that timber harvest is appropriate in these units. Thus, General Use land is appropriate to include in the AAC and the Approved Revision on page 2-15 will not be removed.

However, to address the concern that these General Use lands remain in the state’s land base, **I will modify Management Guideline H, Maintenance of State Land Base**, on page 2-15 by **adding the following underlined text**. The new guideline will read: “Maintenance of State Land Base. Land designated Forestry, and land designated General Use with the management intent that timber harvest is appropriate, in this area plan is to be retained by the state and is not to be converted to another plan designation. If the latter is considered necessary, a public meeting is to accompany the plan amendment. Nonetheless, it is the policy of this plan that such conversions should not be considered until the plan is revised through a comprehensive plan revision process.”

**Issue:** IRS, page 12, 1<sup>st</sup> row, Forestry (2-14). DNR’s response states that “ the requirement to follow the Susitna Forest Guidelines (SFG) is mentioned in management guideline A(2).” I could not find this in A(2) and ask that the SSAP include specific language that requires compliance with the SFG.

**Department’s Response:** You are correct that the Timber Harvest Guideline in A(2) on page 2-14 does not list “Susitna Forestry Guidelines.” Therefore, I am **granting your request for reconsideration on this issue and adding “Susitna Forestry Guidelines” to A(2) on page 2-14.**

**Issue:** IRS, page 20, 5<sup>th</sup> row, Settlement (2-27). DNR states that “as a matter of practice, DNR has been following Borough platting requirements.” If DNR does this, then the SSAP should so state and I ask that the SSAP be revised accordingly.

**Department’s Response:** I agree and **I am granting your request for reconsideration on this issue. Management Guideline B, on page 2-4, will be revised by:** (1) adding the following underlined text to the title: “Coordination with Local Comprehensive Plan, Zoning Ordinance and Platting Requirements”; and (2) adding the following text: “State subdivision plats will comply with borough platting requirements per AS 38.04.045(b).”