



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Natural Resources

### Division of Forestry & Fire Protection

Director's Office  
550 West 7<sup>th</sup> Avenue, Suite 1450  
Anchorage, AK 99501-3561  
Main: 907.269-8463  
Fax: 907-269-8931

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Stephanie Miller  
Assistant Director for Future Forest  
USDA Forest Service  
Denver Federal Center, Building 40  
Lakewood, CO 80215

Submitted online at <https://cara.fs2c.usda.gov/Public/ReadingRoom?project=Directives-4178>

Re: Public Comment for the Forest Service Manual 2470, Silvicultural Practices #Directives-4178

Dear Assistant Director,

The Alaska Department of Natural Resources (DNR) Division of Forestry & Fire Protection (DOF) reviewed the Forest Service Manual 2470, Silvicultural Practices, and recommends the following:

**Consider compiling specific Indigenous Knowledge into a written compendium that is accessible to all foresters and silviculturists**

The change allowing for the consideration of Indigenous Knowledge in the preparation of detailed silvicultural prescription is embedded throughout the update. DOF encourages the U.S. Forest Service (FS) to begin compiling and explaining Indigenous Knowledge into a written compendium that is accessible to all foresters and silviculturists. As site-specific application of Indigenous Knowledge begins to be implemented through detailed silvicultural prescriptions, having access to a written synopsis of the applicable Indigenous Knowledge and how it influences on-the-ground management will be useful to foresters and silviculturists not only within the FS, but outside it as well, to include non-federal public and private, forest managers. DOF recommends that the compendium be a living document that is expanded as Indigenous Knowledge is continually obtained through consultation on future project work.

Thank you for the opportunity to comment. Please contact me at (907) 761-6225 or [norman.mcdonald@alaska.gov](mailto:norman.mcdonald@alaska.gov) to coordinate any follow-up discussions.

Sincerely,

Norm McDonald  
Acting Director

Ecc: John C. Boyle III, Commissioner, DNR  
Brent Goodrum, Deputy Commissioner, DNR  
Jeremy Douse, Deputy Director, DOF