

MEMORANDUM
DEPARTMENT OF NATURAL RESOURCES

State of Alaska
DIVISION OF FORESTRY
Southern Southeast Area Office

TO: Lee Cole, SER DMLW
Bill Kane/Patrick Fowler, ADFG
Mark Minnillo, ADF&G

DATE: March 15, 2021
FILE NO: 2021-25 FYSTS

PHONE: 225-3070

FROM: Greg Staunton
Southeast Area Forester

SUBJECT: Adopted 2021-25
FYSTS & Comment Matrix

The Adopted Five-Year Schedule of Timber Sales 2021 through 2025 is available at:
<http://notice.alaska.gov/201760>

This scoping document has been adopted into the record. A matrix of comments and responses has been incorporated and the maps have been revised to reflect subject matter as applicable.

This document is not appealable.

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DIVISION OF FORESTRY SOUTHERN SOUTHEAST AREA

**FIVE-YEAR SCHEDULE OF
TIMBER SALES
FISCAL YEARS 2021 THROUGH 2025**

Adopted March 2021

Abbreviations

ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADF&G-DWC	Alaska Department of Fish and Game, Division of Wildlife Conservation
ADNR	Alaska Department of Natural Resources
AMHT	Alaska Mental Health Trust Authority
BIF	Best Interest Finding
DMLW	Division of Mining, Land and Water
DOF	Division of Forestry
FLUP	Forest Land Use Plan
FRPA	Alaska Forest Resources and Practices Act
FYSTS	Five-Year Schedule of Timber Sales
MBF	Thousand board feet
OHA	Office of History and Archeology
POG	Productive old growth
POW	Prince of Wales
POWIAP	Prince of Wales Island Area Plan
ROW	Right-of-way
SESF	Southeast State Forest
SESFMP	Southeast State Forest Management Plan
SHPO	State Historic Preservation Office
TBD	To be determined
UA	University of Alaska
USFS	United States Forest Service

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Purpose of the Five-Year Schedule of Timber Sales

This Five-Year Schedule of Timber Sales (FYSTS) provides information to State Agencies, commercial and noncommercial organizations, as well as the general public concerning planning and uses of forest resources on the Southeast State Forest (SESF) as well as other State lands found within the Southern Southeast Area for the State fiscal years 2021- 2025 (July 2020 – June 2025). This FYSTS meets the Alaska Statute (AS 38.05.113) requirements for periodic notification of planned activities, including timber sales, on the SESF as well as other State lands found within the Southern Southeast Area. The Southern Southeast Area encompasses lands from Tracy Arm/Frederick Sound south to Dixon Entrance and Portland Canal.

This FYSTS illustrates the general direction of the Division of Forestry (DOF) with regard to the development of forest resources on the SESF and on other State lands found within the Southern Southeast Area.

This document does not represent harvest activities or harvest levels proposed by the University of Alaska (UA) or the Alaska Mental Health Trust Authority (AMHT). Their respective land offices manage the UA and AMHT lands.

Salvage sales, emergency sales, sales of 160 acres or less, negotiated sales less than 500 thousand board feet (MBF), and personal use permits are exempt from the FYSTS requirements. All other timber sales must be included in one of the two five-year schedules preceding the sale (AS 38.05.113(b)). To give the public a responsible representation of Department of Natural Resources (DNR) activities, the five-year schedule will also include, whenever practical:

1. All sales less than 160 acres that require a Forest Land Use Plan (FLUP).
2. Salvage sales and areas of contiguous small sale activity on at least one FYSTS preceding the sale unless waiting on the schedule will:
 - a. cause substantial losses of economic value on salvage sales under AS 38.05.117, or,
 - b. for sales less than 160 acres, preclude a local economic enterprise or forest management project that is in the State's best interest.

The Southern Southeast Area Office of the DOF bases the FYSTS on lands that are available for timber harvest within the SESF, and on lands identified in the Prince of Wales Island Area Plan, the Prince of Wales Island Area Plan Amendment and the Central/Southern Southeast Area Plan as being available for timber harvest. The Department of Natural Resources (DNR), Division of Mining, Land and Water (DMLW) develops area plans to designate appropriate uses for state land, classify the land accordingly, and establish guidelines for their use based on the multiple use principal. These plans determine where timber harvest is an allowed use and what other uses must be considered when designing and implementing sales. Subsequent land use decisions must be consistent with the area plans.

The areas targeted for timber harvest and development are quantified in this FYSTS based on aerial photo inventory. This is augmented by limited ground reconnaissance and historical knowledge

accumulated by personnel working in the area. To meet the State mandate of sustained yield according to AS 38.04.910, the DOF has taken a conservative approach to developing the annual allowable cut. The DOF manages the annual allowable cut on a decadal basis and will not exceed its allowable annual cut as averaged on a ten-year basis.

All State timber sales must comply with the Alaska Forest Resources and Practices Act and Regulations (FRPA); and the Alaska Land Act and Regulations. Currently, all State timber sales must adhere to area wide land management policies for their respective management unit (Chapters 2 & 3) of the Prince of Wales Island Area Plan, the Prince of Wales Island Area Plan Amendment, or the Central/Southern Southeast Area Plan or the Southeast State Forest Management Plan for lands found within the SESF.

All commercial timber sales that exceed 500 MBF will have a Best Interest Finding (BIF). Additionally, a BIF will be completed on any timber sale that is a negotiated under AS 38.05.118 or AS 38.05.123 and is under 500 MBF in size. A BIF is the decision document that:

- Establishes the overall area within which the timber sale may occur,
- Determines the amount of timber that will be offered for sale and the duration of that sale,
- Sets the overall harvest and reforestation strategy for the sale area,
- Determines whether the sale proposal complies with the Constitutional requirement to manage for sustained yield by evaluating the amount of timber in the sale and the annual allowable cut for the affected area,
- Selects the appropriate method of sale (i.e., competitive or negotiated sale), and
- Determines the appraisal method that will be used to determine sale price

The BIF will go through a preliminary decision prior to adoption. This preliminary decision will have both public and agency review and the DOF will review comments, make changes as appropriate to this preliminary decision prior to adoption of the BIF. The adopted BIF may be appealed in accordance with 11 AAC 02 by any person affected by the decision that provided timely written comment or public hearing testimony on the preliminary decision.

The DOF may negotiate small timber sales under 500 MBF (AS 38.05.115) without a BIF while complying with regulations for these small sales as established in 11 AAC 71.045. Small mill operators have expressed an interest in such sales because they fit their mill capacity needs and are within their economic range. The Southern Southeast Area DOF will layout small sales as ground conditions and sale economics allow. The DOF will strive to accommodate supply needs for as many operational small mills as possible while staying within our workforce and budget constraints.

Prior to authorizing harvest of timber on any area greater than 10 acres, the DOF must adopt a site-specific Forest Land Use Plan (FLUP) for the harvest area. The DOF will prepare FLUPs for

harvest areas within the overall sale area covered by the BIF. FLUPs specify the site, size, timing and harvest methods for harvest unit(s) within the sale area. FLUPs also address site-specific requirements for access construction and maintenance, reforestation and multiple use management. FLUP's will be based on additional fieldwork, agency and community consultation, and site-specific analysis by the DOF, and will be subject to public and agency review.

Following adoption of the BIF and the FLUP, the DOF will offer the timber sale by competitive means (AS 38.05.120) or negotiation (AS 38.05.115, AS. 38.05.118 and AS 38.05.123) with purchasers. Timber sale contracts will include stipulations to ensure compliance with the BIF, FLUP, FRPA and other statutory requirements.

Subsequent to contracting these timber sales, the DOF will administrate the sales and conduct field inspections to ensure compliance with BIF, FLUP, timber sale contract and applicable laws including the FRPA.

Timber Sale Land Base

The State land base in Southern Southeast Alaska includes the major islands of Mitkof, Kupreanof, Kuiu, Wrangell, Prince of Wales and Revillagigedo, and the surrounding smaller islands south of Fredrick Sound. In addition, the land base includes the mainland from Tracy Arm to Hyder. The DOF operates its timber sale program on two types of land classification in Southern Southeast Alaska; General Use (GU) lands and SESF lands. The General Use land has been designated in the Areas Plans as being appropriate for timber harvest along with other multiple use activities. GU lands within their respective Area Plans may have harvest restrictions on a site-specific basis. These restrictions can be found within the Area Plans. The Area Plans designate several different uses of land in addition to GU such as Habitat, Settlement, Recreation and Water Resource Lands.

Outside the DOF's timber sale program, the division manages timber resources on State Lands not designated as GU lands or within the SESF. The DOF in this case is only the timber manager and the land is managed by its respective managing State agency. These lands are not considered a part of the timber sale land base nor is the volume harvested considered in the annual allowable cut. Timber harvest on lands designated as Settlement is considered appropriate, "if intended to support the costs or design of subdivision activity". (POWIAP, pg. 2-22) Over the next five-year period, the DOF anticipates working with DMLW to facilitate the development of roaded subdivisions in Southern Southeast Alaska.

In 2010 and 2011, the Legislature established the SESF. The State's third and newest Forest includes 48,472 acres of land located in Southern Southeast Alaska that originally was GU designated lands. Many of the Forest's 33 parcels are on Prince of Wales Island. Other parcels are located on Gravina, Heceta, Kosciusko, Revillagigedo, and Tuxekan Islands. The remaining parcels are located on the mainland.

By reserving the land ownership and designating it as State Forest lands, the Legislature defined the management intent of the parcels. While GU classified land allows for timber harvesting and

other forestry activities, the State Forest designation focuses the long-term use of the land to providing timber and other forest resources. The primary purpose of SESF “is timber management that provides for production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources.” (AS 41.17.200) The DOF has and will invest in an active manner to achieve the use of these forest resources. Examples of this investment include construction of roads and other infrastructure; and forest management actions such as pre-commercial thinning to improve tree growth and wildlife habitat.

The dominant public landowner in the area is the United States Forest Service (USFS). The dominant private landowners are native village corporations including Shaan-Seet Corporation, Kootznوو Corporation, Klukwan, Klawock-Heenya Corporation, Kavilco, Kake Tribal Corporation, Haida Corporation, and Cape Fox Corporation. The regional native corporation is Sealaska Corporation.

Management Intent of the DOF Timber Sale Program

The DOF’s management intent for Southern Southeast Area is to provide raw material for the local timber industry while maintaining the sustained yield of renewable resources. The intent of the timber sale program is to help support the wood product businesses in Alaska’s southeastern communities. At the present time, most negotiated State timber sales in Southern Southeast Alaska require primary manufacture in the State, with emphasis on producing value-added and high value-added products. The percentage of required in-state manufacturing varies by timber sale. Resource protection, road construction costs, transportation costs, sale location, sale size, timber species and the world economy are all influences that affect the ability of a timber sale purchaser to process timber locally. The State will pursue processing as much of the timber locally as possible while maintaining a focus on delivering economically operable timber sales to local manufactories.

It is the DOF’s intent to offer the annual allowable cut for Southern Southeast on a yearly basis while complying with the FRPA and Regulations; the Alaska Land Act and Regulations, management guidelines from Area Plans, and the SESF Management Plan. State timber sales will be targeted to offer opportunity to as many local processors as possible. The DOF also offers timber for sale by competitive bid under AS 38.05.120 to the highest qualified bidder. Timber volume sold under this authority is available for round log export.

Timber Harvest Methodology

The majority of the timber harvest in the Southern Southeast Area will be accomplished by the clear-cut method. The Division feels that clear cutting is an effective and safe silviculture tool to use, given the patchwork of varying land uses allowed on State land by the existing area plans. Where silviculture goals can be achieved and it is economically practical with respect to a perceived need for specific species or type of timber, a selective harvest will be considered and designed.

The DOF is required to manage its timber harvest on a sustained yield basis (AS 38.05.065(b) (1)). “Sustained yield” means the “achievement and maintenance in perpetuity of an annual or regular periodic output of the various renewable resources of the State land consistent with multiple use” (AS 38.04.910). The Division’s policy is to define “regular periodic output” as output over a ten-year period. Based on proposed sales and 2009-2019 harvest data, sales through 2019 were within the “sustained yield” management objective. When the total annual volumes listed in this FYSTS exceed the allowable cut on a yearly basis; it is done for planning purposes and to allow leeway within the DOF’s timber sales program to react to unknown project constraints and market fluctuations.

The annual allowable cut calculation is determined by using the area regulation method, a method that best utilizes existing forest stand information. The area regulation method involves determining the net-forested acres available for harvest and dividing that number by the rotation period. The rotation period is the time it takes to grow a commercial stand of trees. A 100-year rotation has been the established standard for Southeast and is currently being used by the DOF. This rotation age could be adjusted in the future as more information on growth patterns of even-aged timber stands become available. Initial studies indicate that good sites could be managed on a rotation age as low as 65 to 80 years in Southern Southeast Alaska.

The Area Plans and the SESF Management Plan are the governing source for gross available acreage. The DOF has estimated that within the Area Plans there is estimated 27,200 acres on GU and other classified lands that can be considered for timber harvest. The SESF has an estimated 47,355 acres that can be considered for timber harvest. As a result of this a gross total of 74,555 acres can be considered for timber harvest. The gross total acreage is further refined through reductions in acreage for such things as vegetative cover that is capable of growing commercial timber, known resident high value and anadromous stream retention areas, exclusion zones listed in the Area Plans, coastal buffers, and isolated remote areas with a high percentage of low volume timber. This further refinement of acreage is called the net timber base (NTB). The DOF estimates the NTB to be 33,216 acres. When the total NTB acreage (33,216 acres) is divided by the 100-year rotation period, an annual allowable cut of 332 acres is derived. The Division conducted a field inventory cruise in 2019 and audited the available land base for timber harvest in 2020 to arrive at these figures. Based on the forest stand inventory information, an average volume of 27.5 MBF per acre was applied yielding an allowable cut of 9,147 MBF per year. The Division will periodically adjust and refine the acreage based on fieldwork dependent upon land management actions, staff availability and travel funds.

Existing Market Influences

The timber market in Southeast Alaska is influenced in large part by its location on the Pacific Rim. Due to the limited local market demand, products are marketed in lumber and the round log form to North American continental market and foreign markets abroad. Western red cedar for the past decade or more has been a strong contributor to timber revenue in the Southern Alaska Panhandle, either processed domestically or shipped in the round. Timber sales without a red cedar component or with a larger and high-quality spruce typically have had low net value returned for stumpage to the landowner. During this period, China has assumed the major role consuming the lower-quality old growth spruce and hemlock as well as the young growth timber that is emerging in merchantable form. Legacy markets in Japan and Korea have generally waned. The Pacific Rim market was significantly disrupted in 2018 and 2019 by the trade war and tariff actions between the US and China. The tributary effects it had on the other world markets and the decreased shipping costs realized by competitors also hindered market position in Alaska as products were realigned with other markets. In early 2020 a collapse of the China hemlock and spruce export market was evident that was closely followed by the Covid-19 pandemic. At the time of this FYSTS, export markets are functioning at a marginal level due to shifting shipping and supply issues associated with the pandemic shutdowns in Europe and elsewhere. Operations and markets are anxious due to abnormal risk factors present that have not resolved themselves. The sales portrayed in this FYSTS are based on past market configurations and may not be indicative of future demand.

Narrative Summary of Five-Year Schedule Activities

This schedule includes sale area maps for all potential sales over 10 acres in size for CY 2018- CY 2022 considered at this time. Due to a variety of reasons, including budget constraints, lack of personnel, sale program direction and market uncertainties, most of the sales in the last three years of this schedule are conceptual. Refinement of photo layout and ground reconnaissance will begin as time and budgets allow. Right-of-way sales, blowdown sales and sales less than ten acres in size are not generally located on the maps for this FYSTS.

In some years, total annual harvest volumes for this FYSTS are collectively higher than the AAC on a yearly basis. Estimated volumes are coarse in nature for most of the sales listed. While the DOF desires to represent and implement an accurate schedule, unforeseen conditions often influence and change the direction of the program, the order in which sales are delivered or our capability. Market conditions and other externalities (Covid-19) have affected what has been delivered in the past year and are likely to continue to bear influence as we move forward. Under no condition will the annual allowable cut be exceeded as averaged over a ten-year period.

Small/ Medium Sized Sales

Small sales will be located throughout Southern Southeast Alaska as demand and staffing make them feasible. The DOF has generally sold several small sales each year totaling less than 2,000 MBF per year. The demand for this size of state timber sale has varied due to the timber available from other sources. Small scale operators can have financing and logistical issues when road construction is required for access; this is a fundamental barrier to implementation of a small scale timber operations. Another hurdle common to all sale sizes can be the species configuration and quality of the timber; smaller operators tend to have less market options. To the extent feasible, the division will continue to work towards meeting demand for this level of timber sale as access, markets and staffing allow. Currently most of the demand for these sales is on Prince of Wales Island.

Existing infrastructure and location lend to this size class of sales in the Thorne Bay, Control Lake and Naukati areas. The following sale series have potential to be configured and offered in units that might fit the observed business profiles of the smaller mills.

North Thorne Bay

Backside Sales

OLD GROWTH ACRES: 93

ROAD MILES: 1.25

Two stands are shown on the North Thorne Bay map. They are surrounded by 40 year old young growth stands in the northern part of the tract and contain an estimated 1,800 MBF. The southern stand referred to as Backside #1 is accessed from the Water Lake access road (3000140); it is not part of the watershed of the City of Thorne Bay. The Backside #1 Sale is projected to require 0.25 miles of access spur and the recondition of the existing 3000142 Spur on its north side. The northern stand referred to as Backside #2 would require approximately one mile of road to access it. The Alaska Forest Association has observed that it might be better offered as a helicopter sale due to the cost of the proposed road.

Overlook Sale

OLD GROWTH ACRES: 25

ROAD MILES: 0.4

This area is located on Settlement classified land. Timber harvest would facilitate initial access for later subdivision actions by the State. The DMLW and the DOF have requested access to the area from the USFS managed 3018050 Road. Further planning is pending authorization from the USFS.

Stairway Sales

OLD GROWTH ACRES: 324

ROAD MILES: TBD

This area is located on Settlement classified land in the South Thorne Bay area. The areas identified along the ridge are isolated patches of timber; the land base will likely not be utilized for Settlement purposes due the isolated location relative to the infrastructure of Thorne Bay. Timber harvest appears feasible if access is granted through USFS and MHLT managed lands to the west and south. The configuration and location are proximate to the Goose Creek area sawmills. The geology will be confirmed as stable relative to other important resources in the area such as the Thorne Bay/ Kasaan Road prior to progressing

with plans in the BIF and FLUP processes. A small stand of old growth timber has also been identified in the northwest corner of Section 33; access to this timber would extend an existing subdivision road. Placement of the spur would be coordinated with the DNR-Land Development Section in support of a long term goal of providing an alternate access route to the existing subdivision and other lands in the area.

Naukati Area

OLD GROWTH ACRES: 162

ROAD MILES: TBD

Located on Prince of Wales Island near the community of Naukati, this area consists of three harvest areas which may be sold in several sales. The harvest areas contain an estimated 3,700 MBF of timber and will likely need the construction of short spur roads into each unit. Of the 162 acres, 103 acres are within the SESF, 59 acres are on lands designated as General Use. DMLW also is considering several subdivisions within the vicinity of Kaikli Cove and Little Naukati Bay. Harvest activities are being considered as part of this development. The harvest within the Settlement lands will only occur in coordination with the DMLW and if the requirements of Chapter 2 of the Prince of Wales Island Area Plan are met. The extent of anadromous habitat will be determined in cooperation with ADF&G during the development of the BIF and FLUP.

Control Lake Area

OLD GROWTH ACRES: 170

ROAD MILES: 1.4

Located on Prince of Wales Island near Control Lake and the junction of Highways 925 and 929, this area consists of eight harvest areas. The harvest area totals approximately 170 acres containing an estimated 3,400 MBF of timber. Approximately half of the harvest area is within the SESF, the other is on lands designated as General Use.

Larger Sales by Target Fiscal Year

2021 Fiscal Year

Bay View (Thorne Bay Area)

OLD GROWTH ACRES: 587 YOUNG GROWTH ACRES: 0 ROAD MILES: 8.2

Located northeast of the City of Thorne Bay on Prince of Wales Island. It is east of the Water Lake area; the road access is an extension of the existing State Forest road system off the 3000 Road. An estimated 4,000 MBF is proposed to be harvested within the State Forest and another 11,000 MBF on Settlement classified lands. The vision is one primary sale to establish access to the area starting in 2020 followed by several small sales in later years. The BIF was issued in 2019 for the principal area and the FLUP presented in the spring of 2020.

Heceta Area

OLD GROWTH ACRES: 145 YOUNG GROWTH ACRES: 80 ROAD MILES: 2.5

Based on field layout, an estimated 5,000 MBF of timber is potentially available on Heceta Island in two units: Heceta East and Heceta West. Heceta East is in the SESF and Heceta West is on General Use classified land. The units have a mix of young growth and residual old growth. The OHA has visited the area and their recommendations have been incorporated into the sale design. The ADF&G has conducted stream inspections several times to verify extent of anadromous habitat. Coordination with the DMLW will take place during the FLUP planning process to ensure that requirements of Chapter 3, Subunit 10a of the Prince of Wales Island Area Plan are met. Access is proposed from the USFS managed land and road system. The routes across USFS are the shortest routes for both units and avoid known resources of concern (cultural/ historic sites, karst, and anadromous waters). The application for use of the routes is pending USFS review. *Due to delay in the application processing at the USFS the sale will likely be rescheduled in FY2022.*

Kosciusko Island Area

OLD GROWTH ACRES: 168 YOUNG GROWTH ACRES: 0 ROAD MILES: 1.6

The State made the BIF (Edna Bay Parlay) decision in 2017 to offer old and young growth timber for harvest on Kosciusko Island. Based on reconnaissance on 720 acres, an estimated 14,000 MBF of timber has been identified as potentially marketable based on markets at that time. All the proposed operations are within the SESF. Uncertain market and operating conditions moved DOF to postpone the young growth portion of the sale indefinitely in 2019. *The DOF will reevaluate the timing of the sale of the young growth portion originally proposed in the best interest finding as conditions stabilize.* The 168 acre old growth portion of this sale adjacent to the LTF area has an adopted FLUP (Edna Parlay One, SSE 1342-K, 9/2019) and is planned to be sold separate from the young growth.

2022 Fiscal Year

Gravina Island

OLD GROWTH ACRES: TBD

ROAD MILES: TBD

Within this area is an estimated volume of approximately 6,000 MBF. The entire proposed operation on Gravina is within the SESF. The area is situated on Gravina Island west of the Ketchikan International Airport. The proposed sale is in two distinct areas, the west side of Vallenar Point and the Bostwick drainage accessed by the existing Bostwick Road. Part of this area consists of the reoffer of 38 acres of the Bostwick #1 timber sale which was not completed under a contract in 2007. To access part of the Bostwick area, there may be a need to cross the east fork of Bostwick Creek with a road. The DOF will work with the ADF&G, Habitat Division for bridge placement across Bostwick Creek. The DOF is considering the use of both conventional and helicopter harvest methods due to the timber location on the terrain and the land ownership configuration. This sale is projected to be composed of numerous small clear cuts or partial cuts. Feasibility of the operation will be market dependent due to the cost of access and logging systems that would be required. Appropriate and flexible utilization standards for the timber harvested will play a role in the feasibility of the sale.

Whale Pass Area

OLD GROWTH ACRES: 320

ROAD MILES: 3.0

This potential harvest area is within the second class City of Whale Pass on Prince of Wales Island and is configured in three identified blocks of timber. Two units are on the north side of the community and other is to the west of the residential subdivision. This area was field verified by contract foresters in 2018 and has the potential to produce 8,000 MBF. The sale area will include a combination of shovel and cable settings. This proposed sale is mainly on the SESF with the small northern unit on GU classified land. The OHA and ADFG have visited the area as part of the planning process.

2023 Fiscal Year

El Capitan Passage Area

OLD GROWTH ACRES: 1,300

ROAD MILES: TBD

The El Capitan area is located on the north end of Prince of Wales Island. Proposed harvest is on a combination of SESF and Settlement/ Recreation classified lands. The DOF and contract foresters conducted a reconnaissance of the commercial timber in 2018. The work identified commercial old growth timber that may be feasible to operate using a combination of ground-based, cable and helicopter logging systems. Timber stands are widely scattered; listed acres and volumes will likely see significant revision as the sale progresses in planning. ADFG visited the streams on State land in 2019. The Office of History and Archeology conducted a field review in October of 2019.

2024 Fiscal Year

George Inlet Area

OLD GROWTH ACRES: 316 YOUNG GROWTH ACRES: 0

George Inlet is located on Revillagigedo Island. Development of this timber sale is dependent on the Alaska Department of Transportation and Public Facilities completing the Shelter Cove Road between the Leask Lake area and the Shelter Cove area. The MHLT is also planning a timber sale in the area separate from the DOF which may influence timing and access. The DOF proposed sale footprint consists of 316 acres containing an estimated 6,300 MBF of timber. The construction of an estimated 1.8 miles of spur road may be necessary to access the stands within the area. The SESF contains 103 acres of this proposed operation and 213 acres are on land designated as General Use. The DMLW is also considering a subdivision within the vicinity of Leask Cove and harvest activities may support some of this activity. The harvest within the Settlement lands may only occur in coordination with the DMLW and if the requirements of Chapter 2 of the Central/Southern Southeast Area Plan are met. The extent of anadromous habitat will be defined by ADF&G during the development of the BIF and FLUP. The SHPO has previously requested to survey the timber sale area as part of the planning process.

2025 Fiscal Year

Earl West Cove Area

OLD GROWTH ACRES: 700 YOUNG GROWTH ACRES: 0 Road 5.0 miles

Earl West Cove is located on the east shore of Wrangell Island. An estimated total volume of 12,500 MBF has been proposed for harvest on approximately 700 acres of SESF land in past FYSTS. The operability of the area still needs significant reconnaissance to verify the estimate. The ADF&G has conducted stream inspections to verify extent of anadromous habitat.

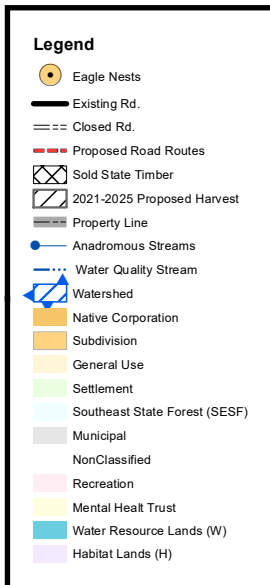
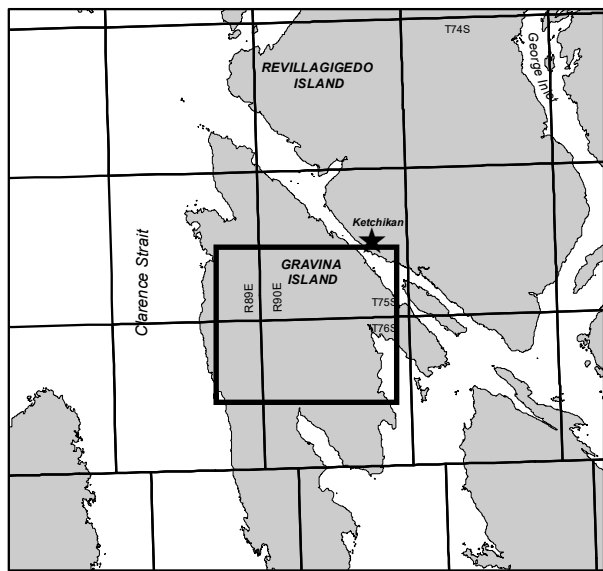
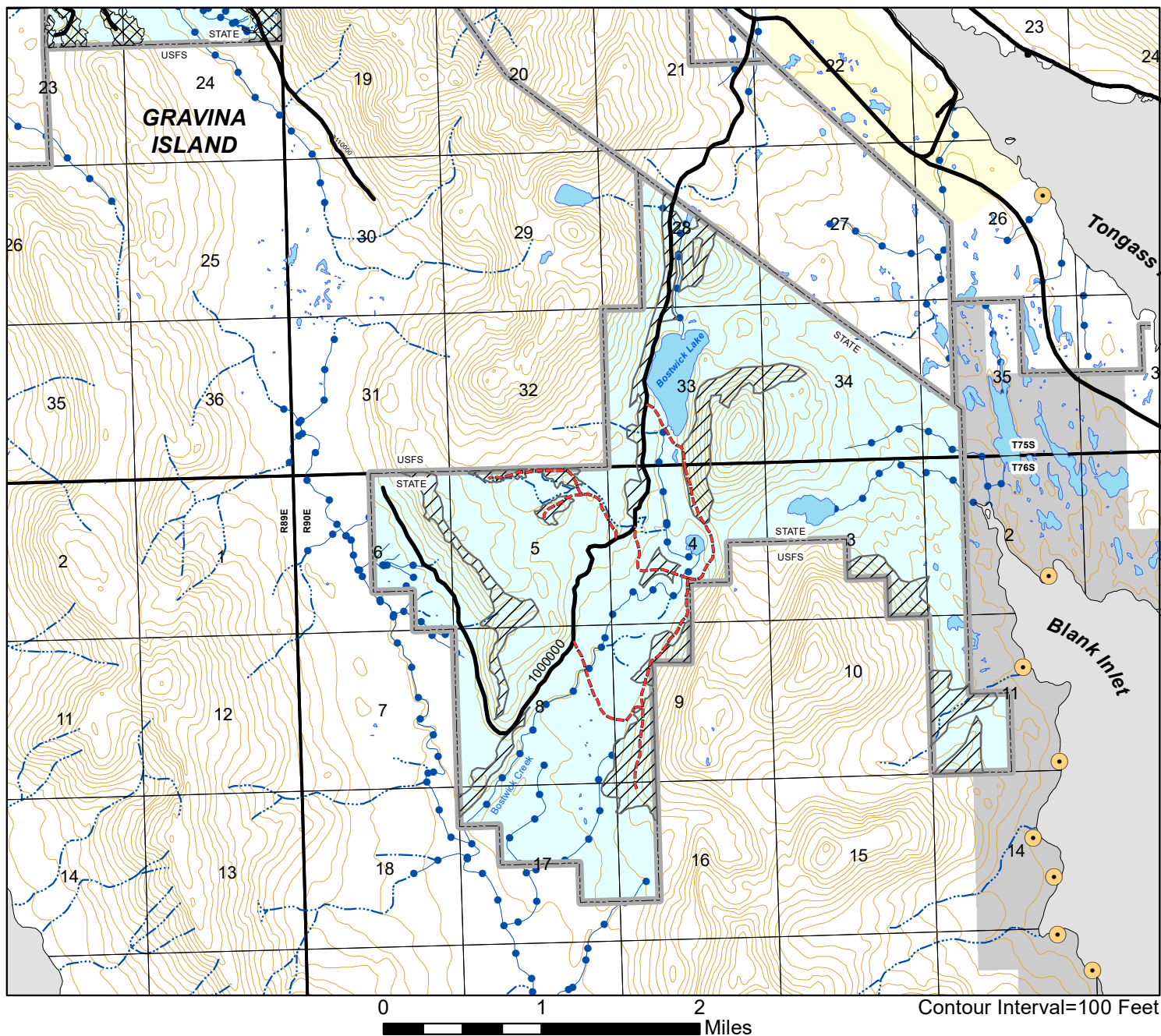
Table 1. Timber Sales by Year

Southern Southeast Alaska		
Five-Year Schedule of Timber Harvests		
Fiscal Years 2021-2025		
<u>Fiscal Year</u>	<u>Timber Sale Name</u>	<u>Estimated Volume (MBF)</u>
2021	Bay View Timber Sale*	14,000
	Heceta Island	5,000
	Kosciusko Island Area	4,500
	Small Sales	2,000
	Subtotal	25,500
2022	Gravina Island	6,000
	Whale Pass Area	6,600
	Small Sales	2,000
	Subtotal	14,600
2023	El Capitan*	12,000
	Small Sales	2,000
	Subtotal	14,000
2024	George Inlet Area*	6,300
	Small Sales	2,000
	Subtotal	8,300
2025	Earl West Area	12,500
	Small Sales	2,000
	Subtotal	14,500
Total for Period		76,900
Note: State Fiscal Year is July 1 to June 30.		
*= Mixture of SESF and Settlement Classified lands.		

Table 2: Maps

Southern Southeast Alaska Five-Year Schedule of Timber Sales List of Supporting Maps

Bostwick Area
Control Lake Area
Earl West Area
El Capitan Passage North
El Capitan Passage North
George Inlet Area
Heceta Island Area
Kosciusko Island Area
Naukati Area
North Thorne Bay Area
South Thorne Bay Area
Vallenar Bay Area
Whale Pass Area



BOSTWICK AREA **FIVE YEAR SCHEDULE** **OF** **TIMBER SALES** **FISCAL YEARS 2021-2025**

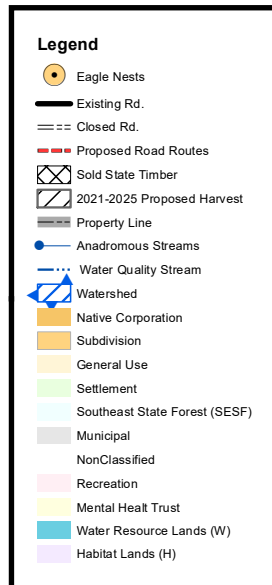
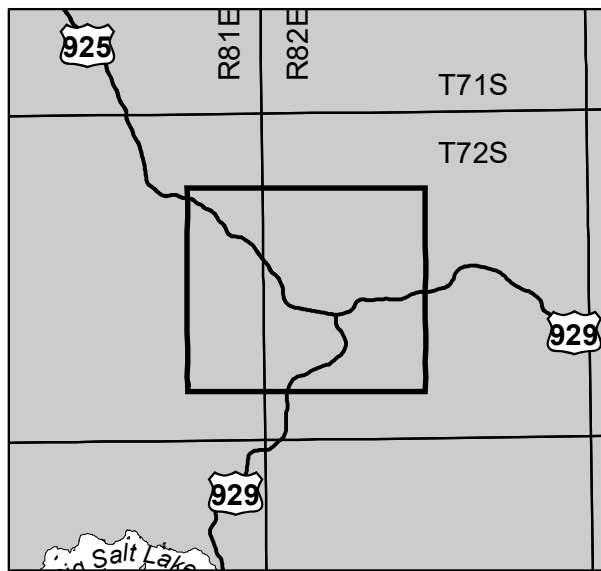
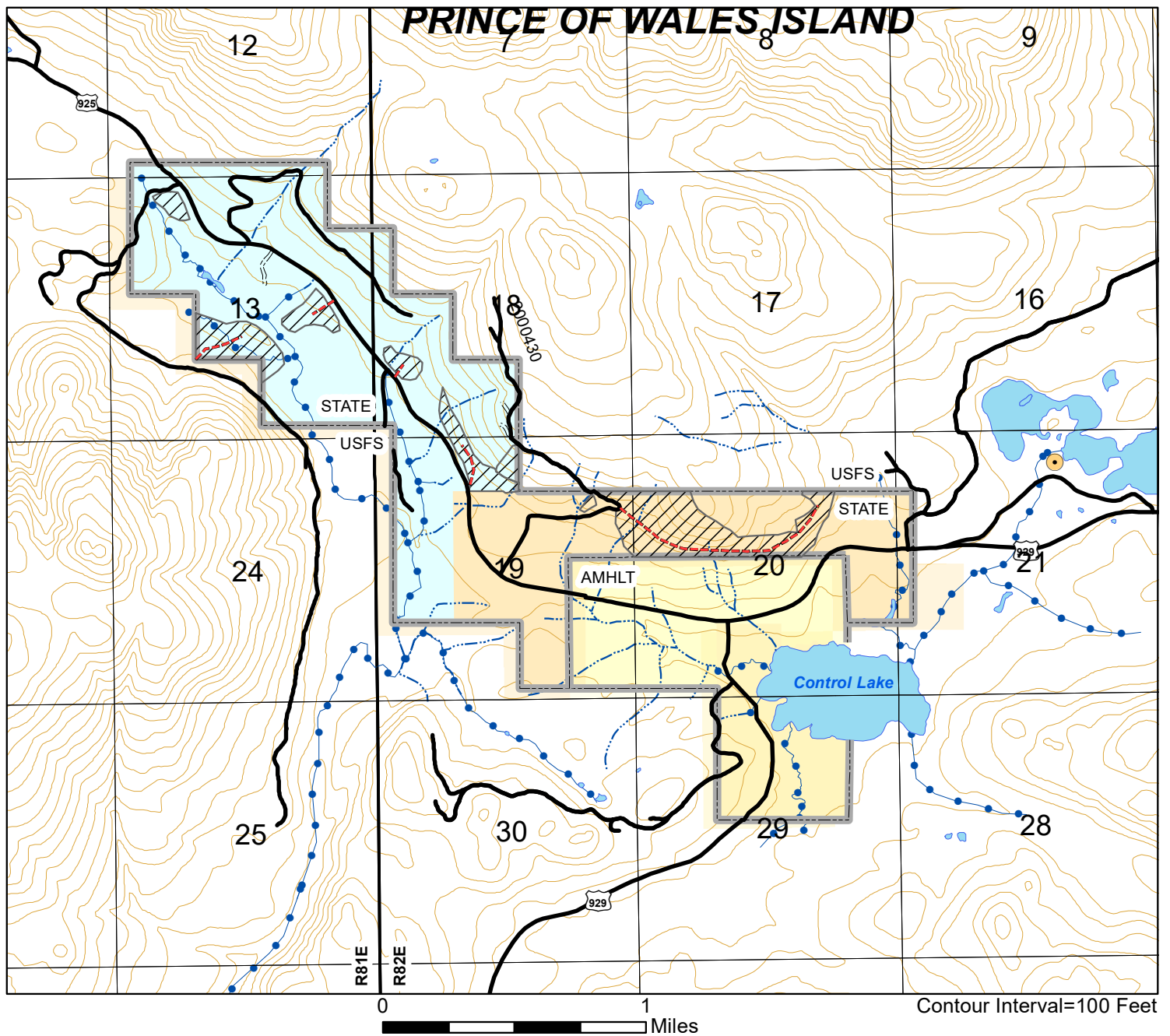


DIVISION OF FORESTRY

Date: 3/3/2021



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CONTROL LAKE AREA FIVE YEAR SCHEDULE OF TIMBER SALES FISCAL YEARS 2021-2025

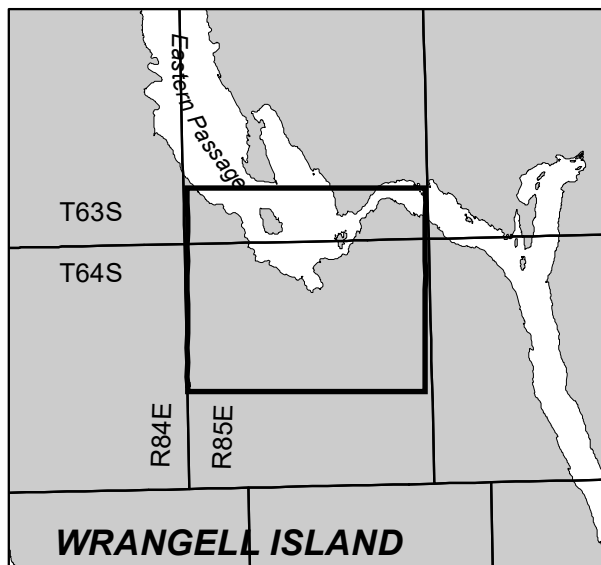
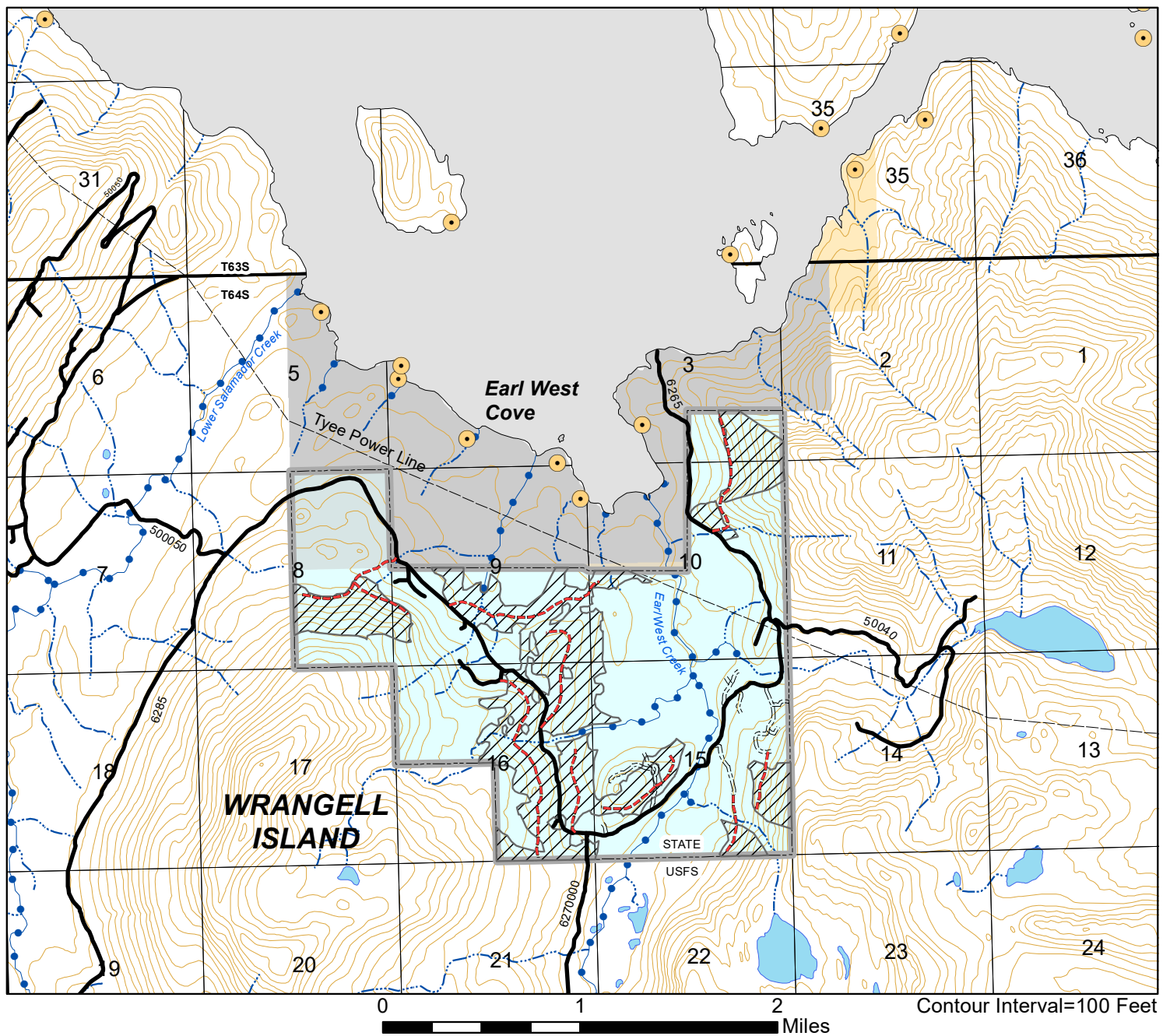


DIVISION OF FORESTRY

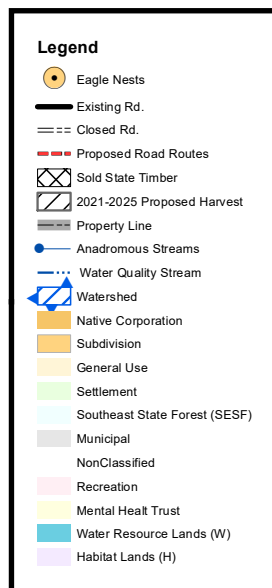
Date: 3/3/2021



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1 in = 5 miles Vicinity Map CRM



EARL WEST AREA FIVE YEAR SCHEDULE OF TIMBER SALES FISCAL YEARS 2021-2025

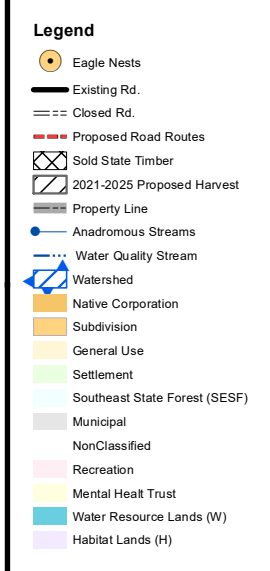
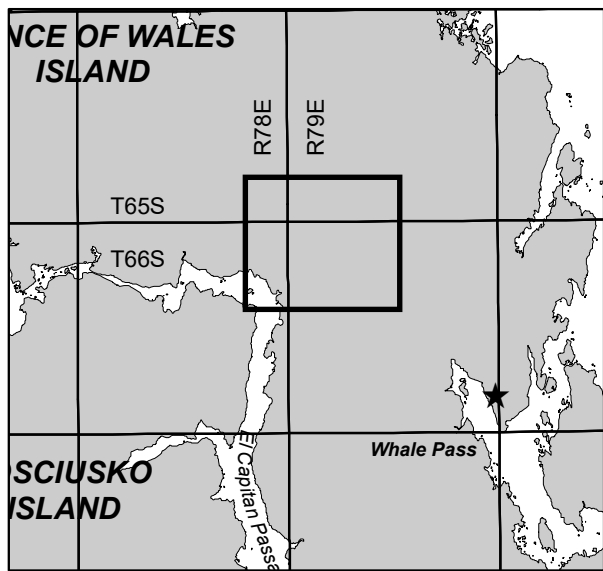
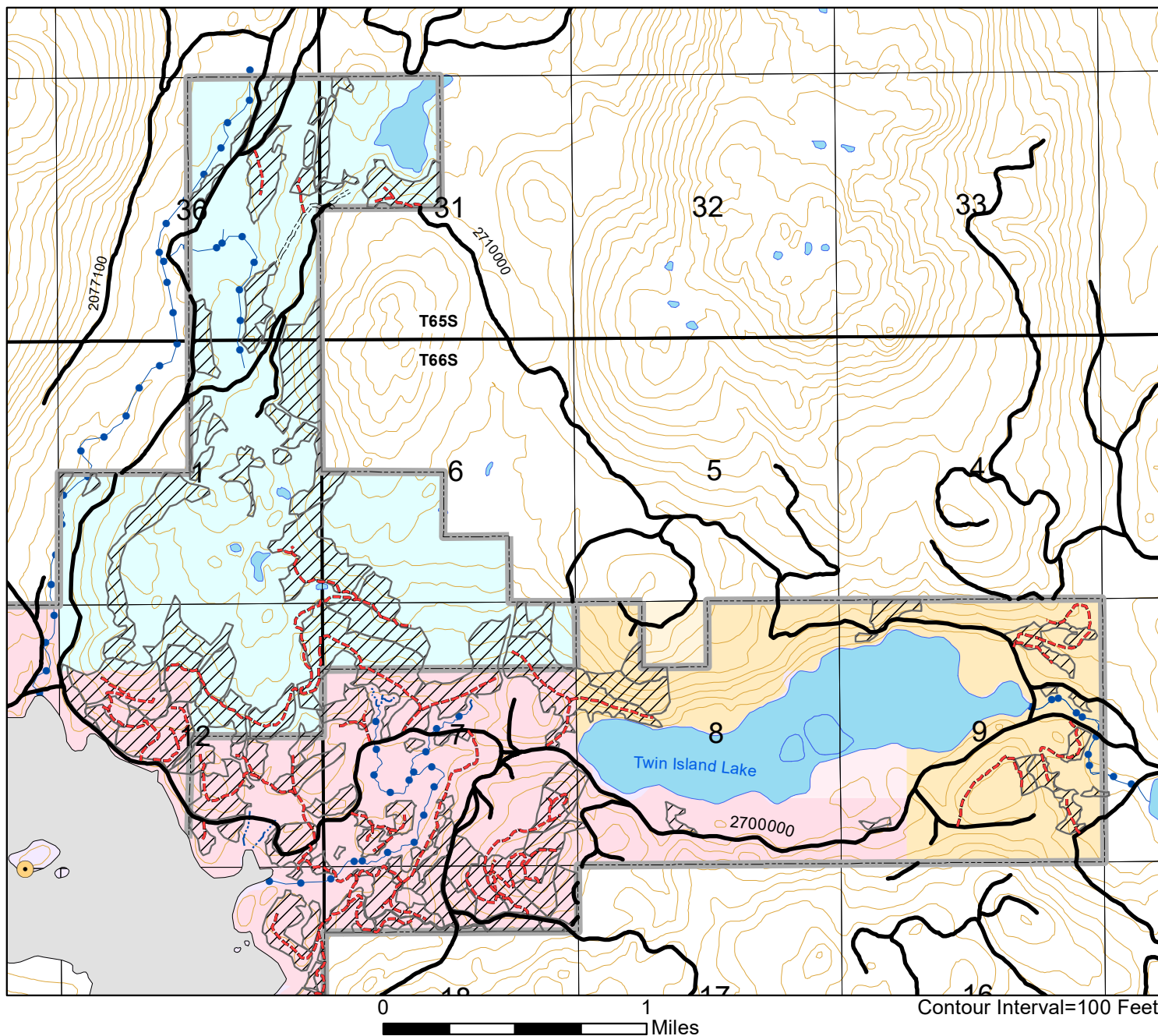


DIVISION OF FORESTRY

Date: 3/3/2021



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EL CAPITAN PASSAGE NORTH

FIVE YEAR SCHEDULE

OF

TIMBER SALES

FISCAL YEARS 2021-2025

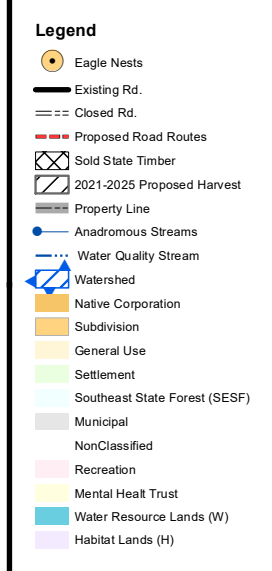
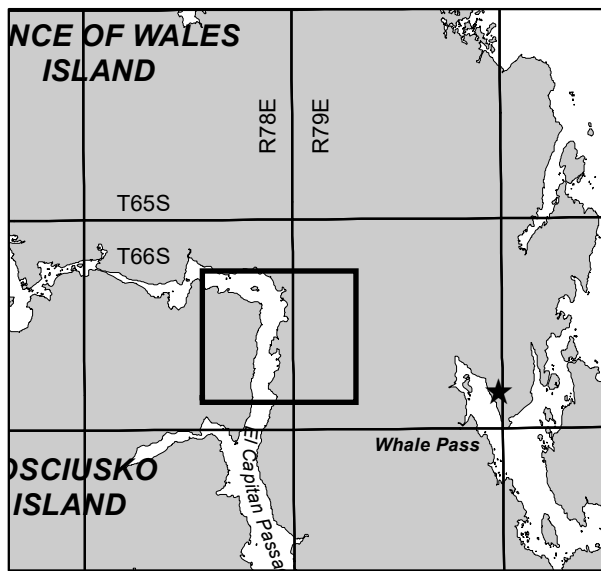
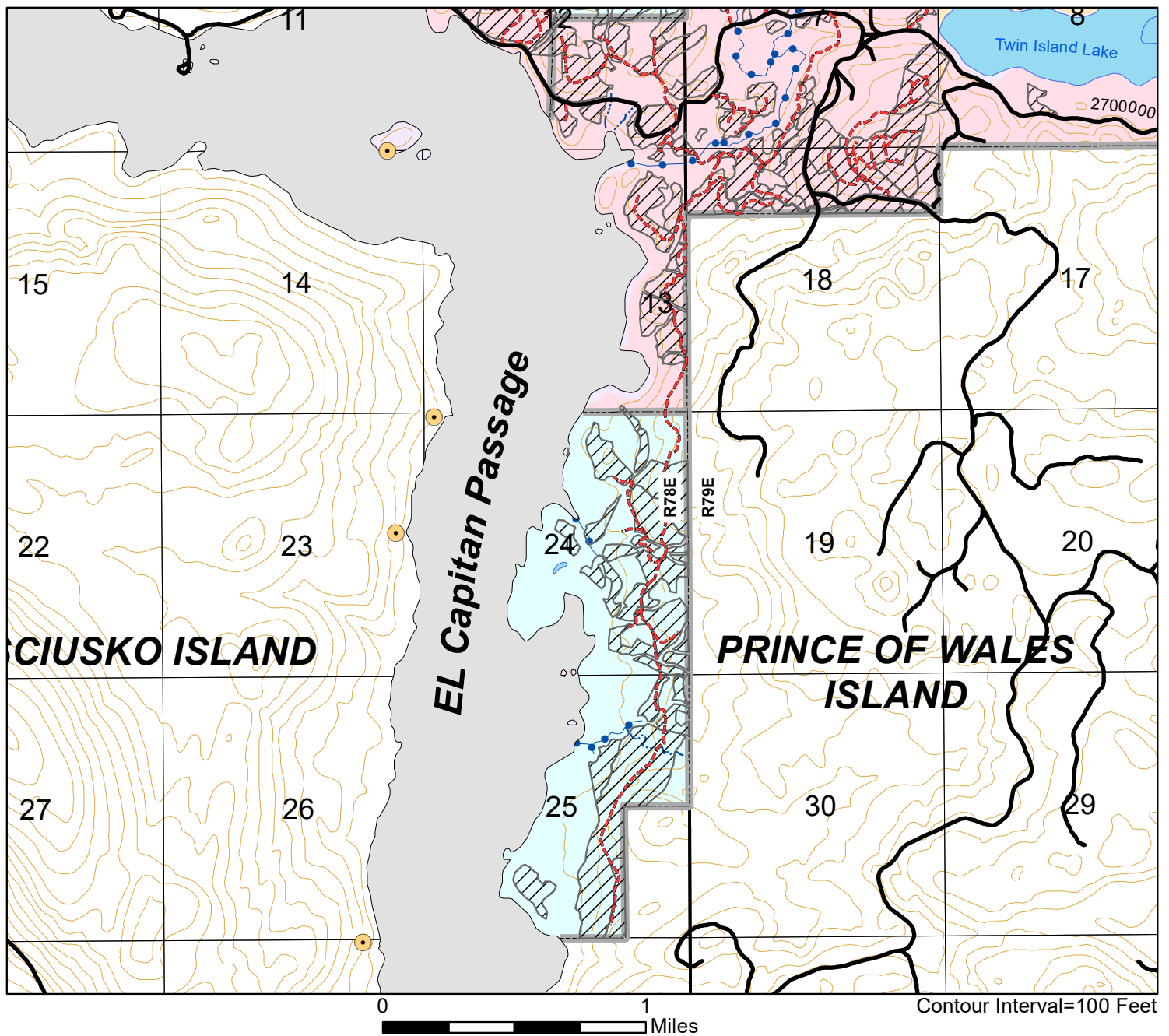


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Date: 3/3/2021



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EL CAPITAN PASSAGE SOUTH FIVE YEAR SCHEDULE OF TIMBER SALES FISCAL YEARS 2021-2025

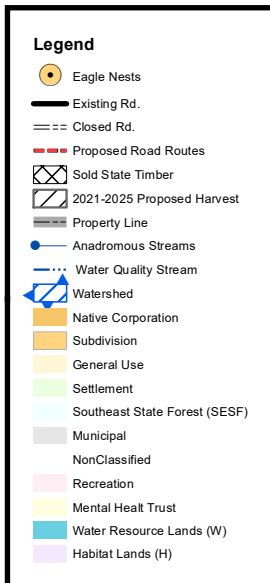
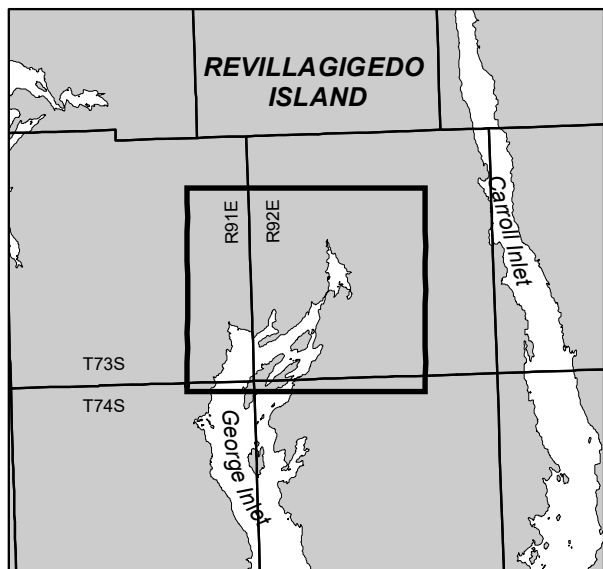
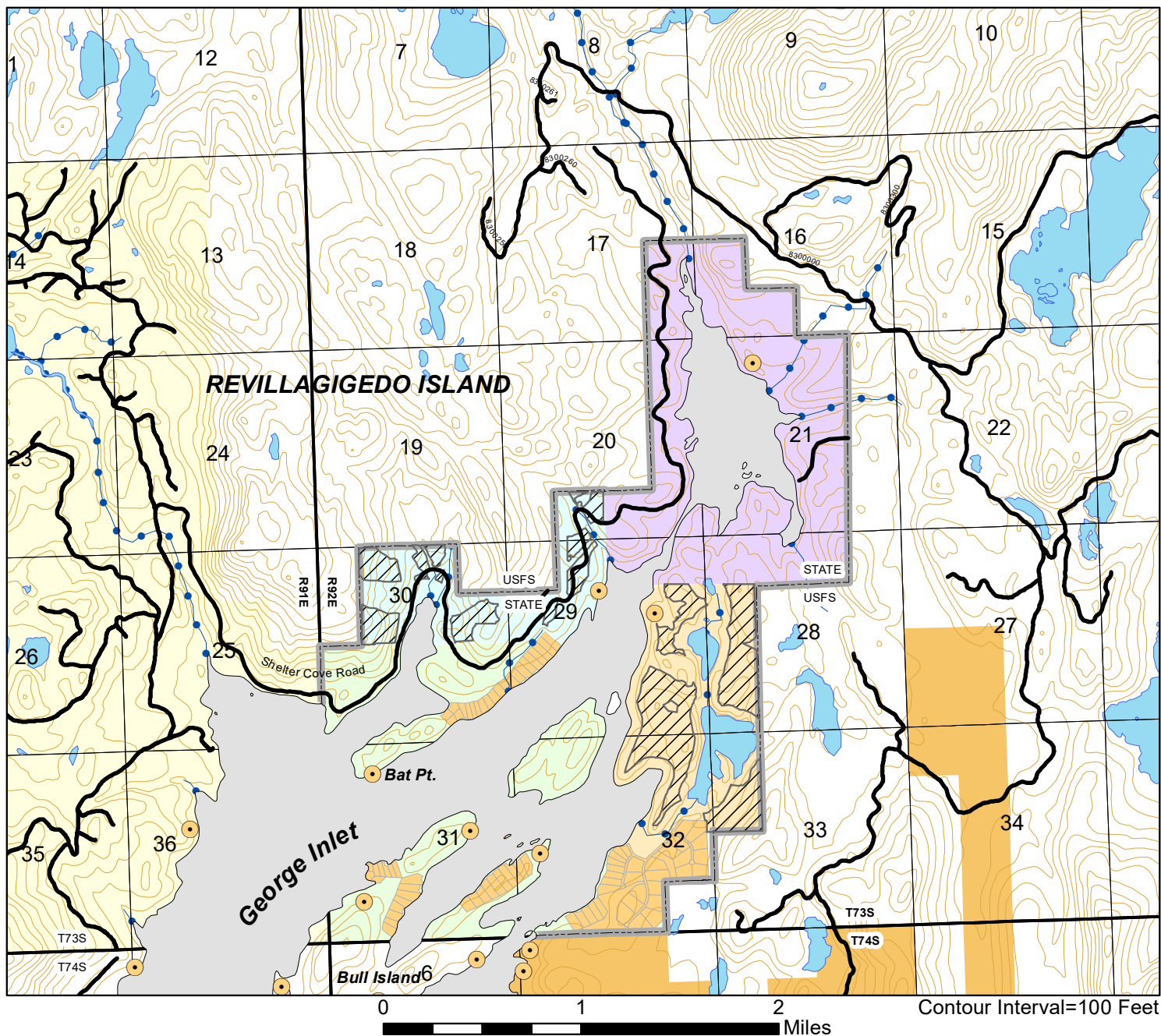


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Date: 3/3/2021



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GEORGE INLET AREA **FIVE YEAR SCHEDULE** **OF** **TIMBER SALES** **FISCAL YEARS 2021-2025**

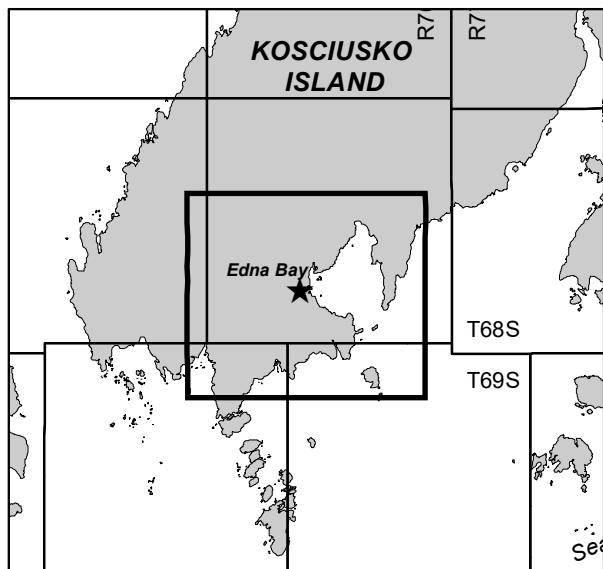
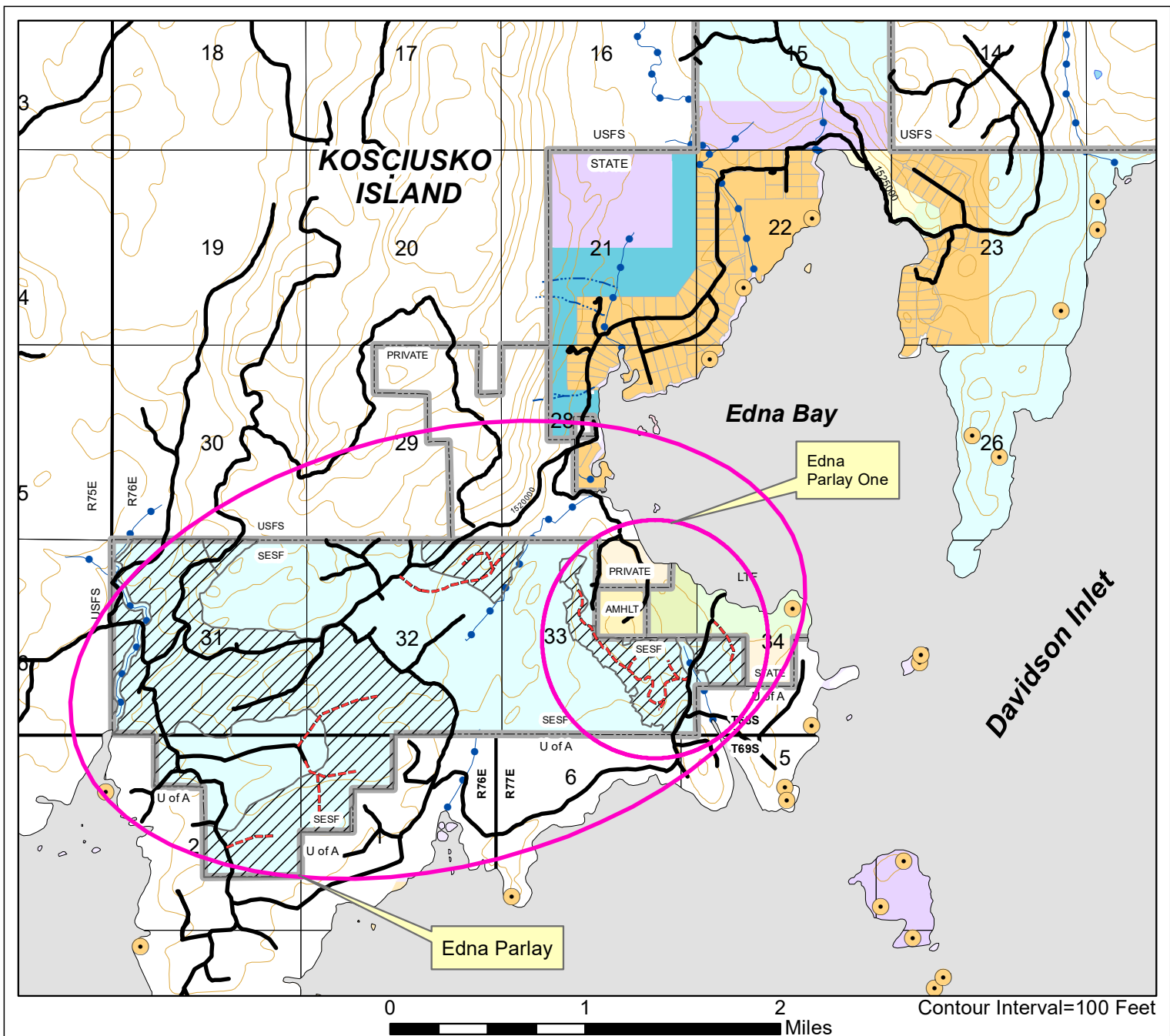


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Date: 3/3/2021



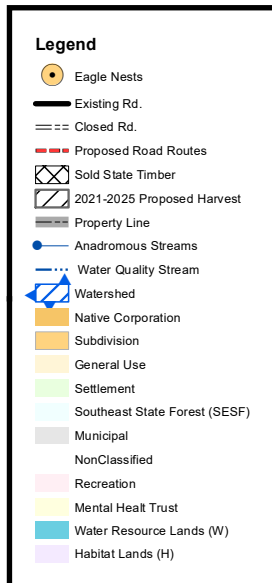
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1 in = 5 miles

Vicinity Map

CRM



KOSCIUSKO ISLAND AREA **FIVE YEAR SCHEDULE** **OF** **TIMBER SALES** **FISCAL YEARS 2021-2025**

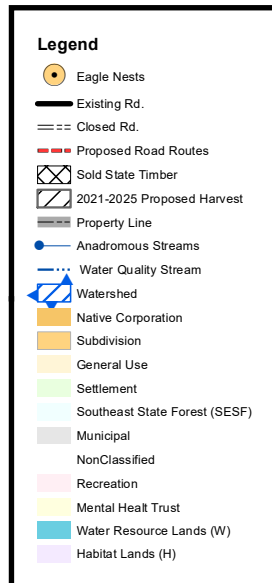
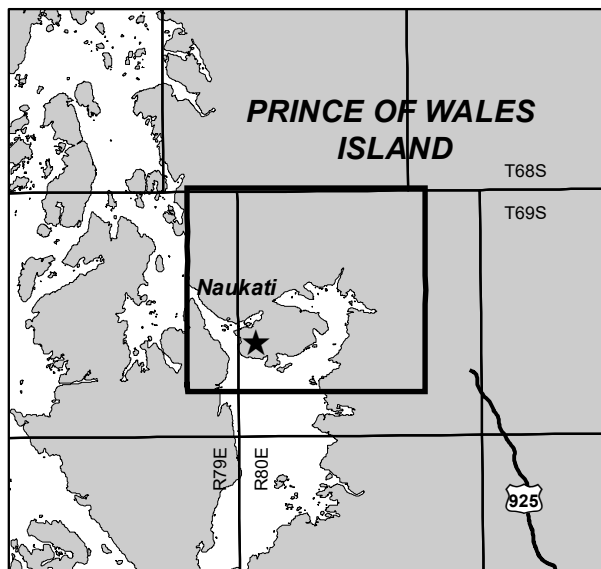
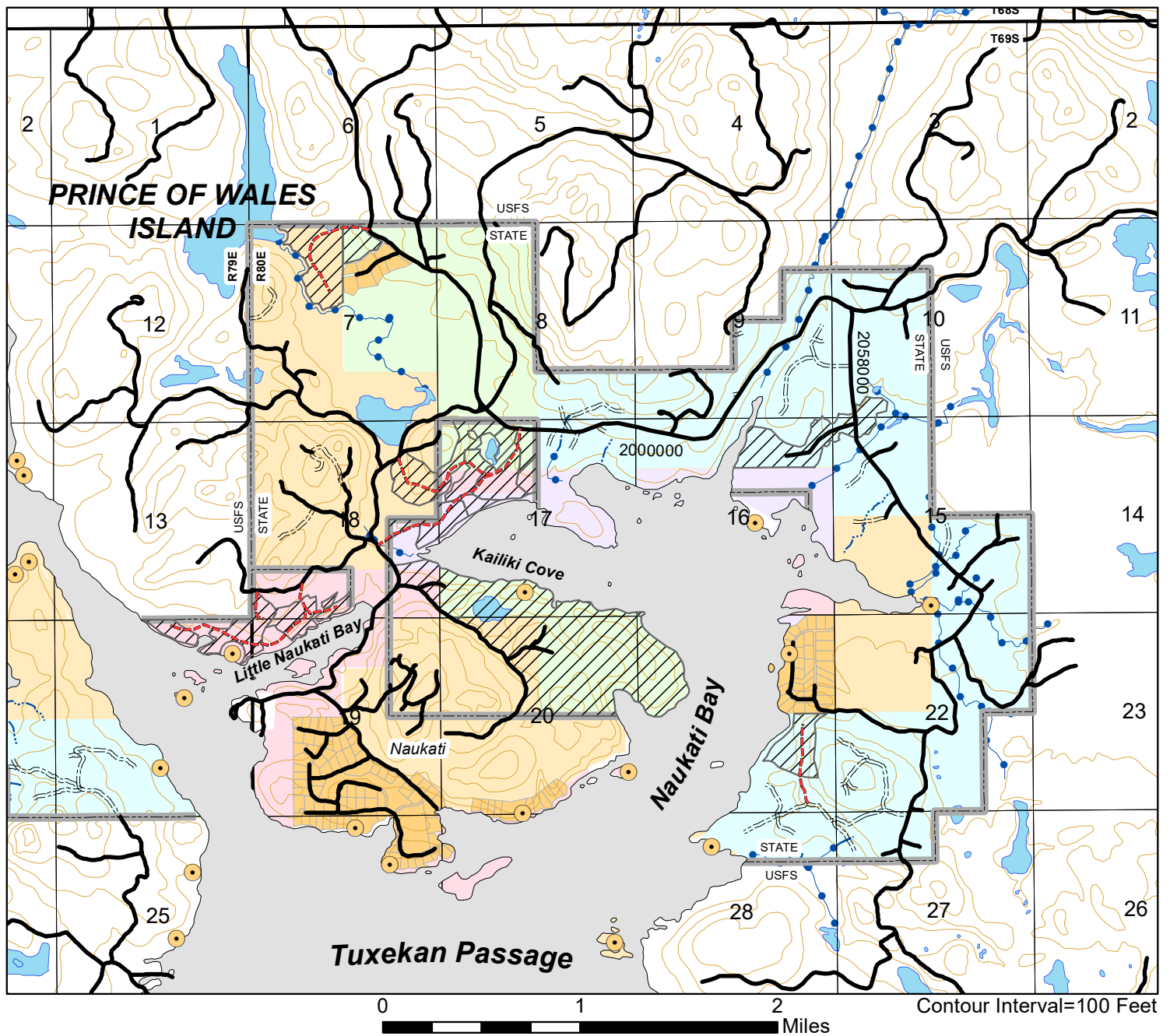


DIVISION OF FORESTRY

Date: 3/3/2021



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NAUKATI AREA **FIVE YEAR SCHEDULE** **OF** **TIMBER SALES** **FISCAL YEARS 2021-2025**

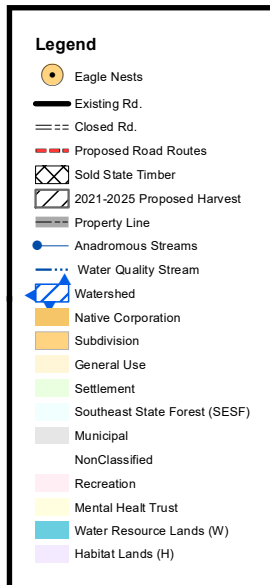
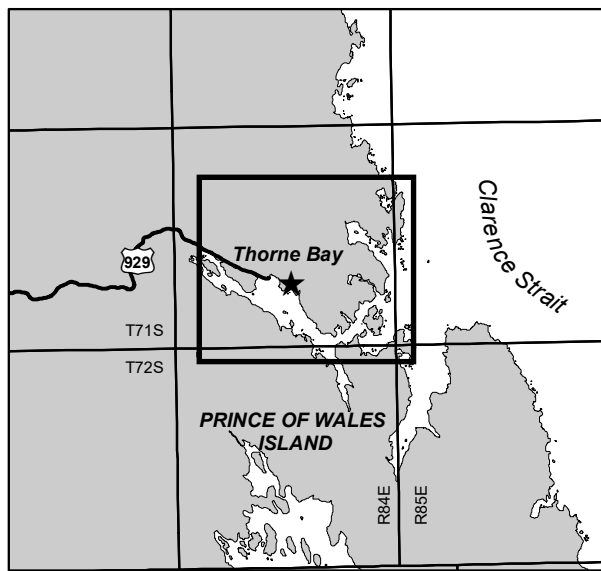
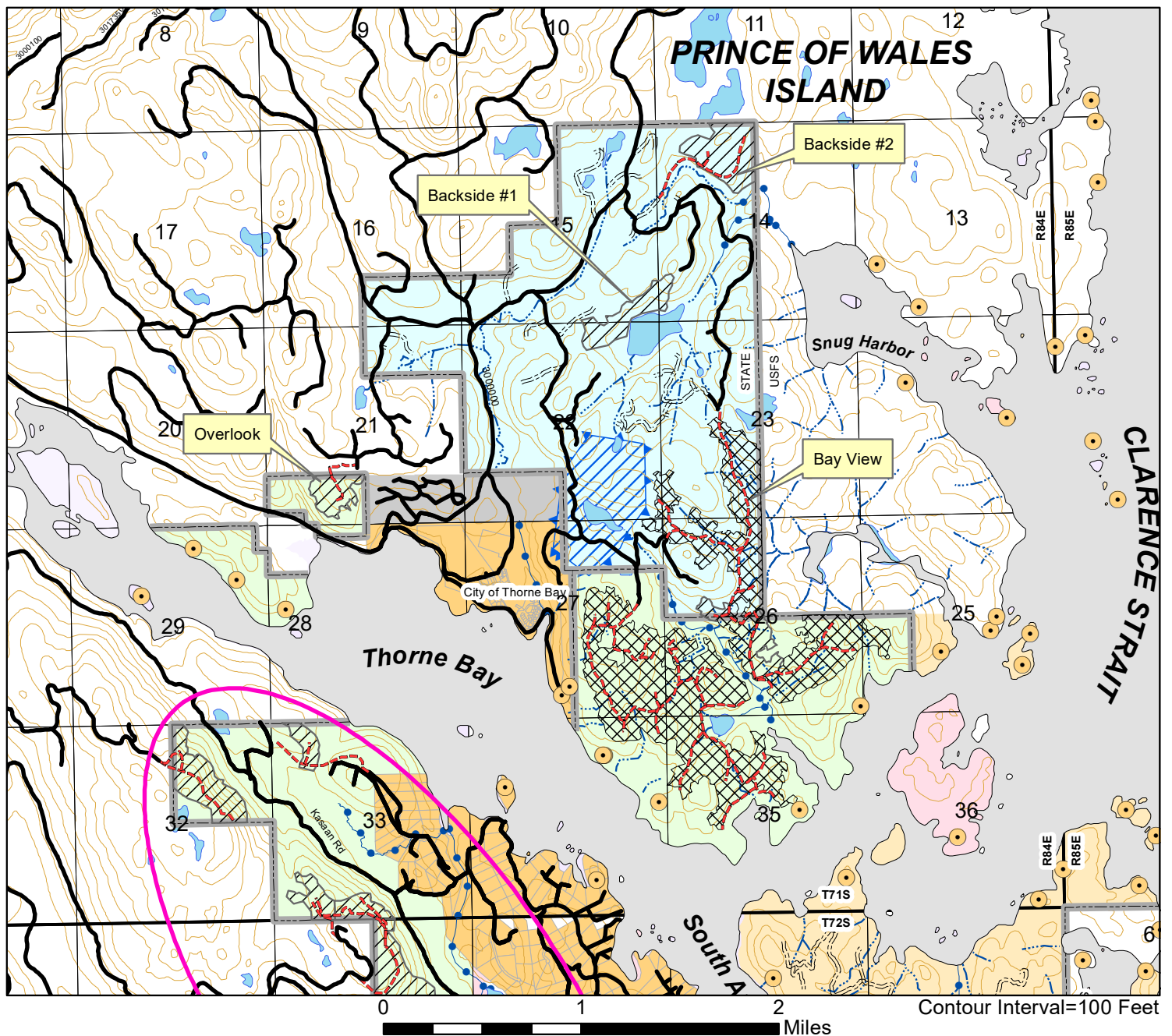


DIVISION OF FORESTRY

Date: 3/3/2021



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NORTH THORNE BAY AREA **FIVE YEAR SCHEDULE** **OF** **TIMBER SALES** **FISCAL YEARS 2021-2025**

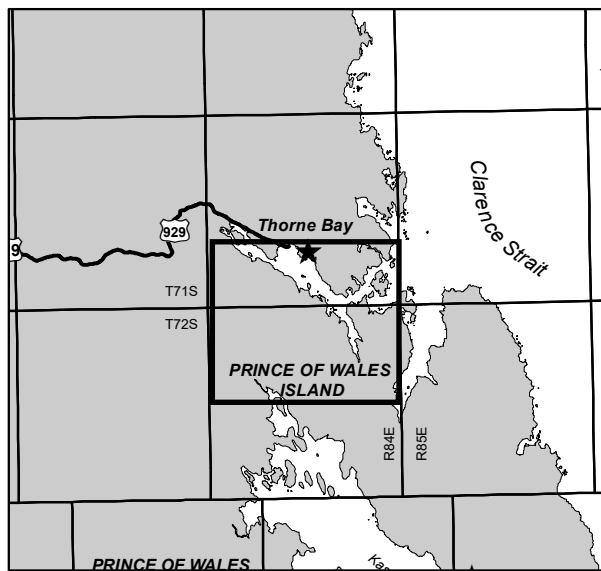
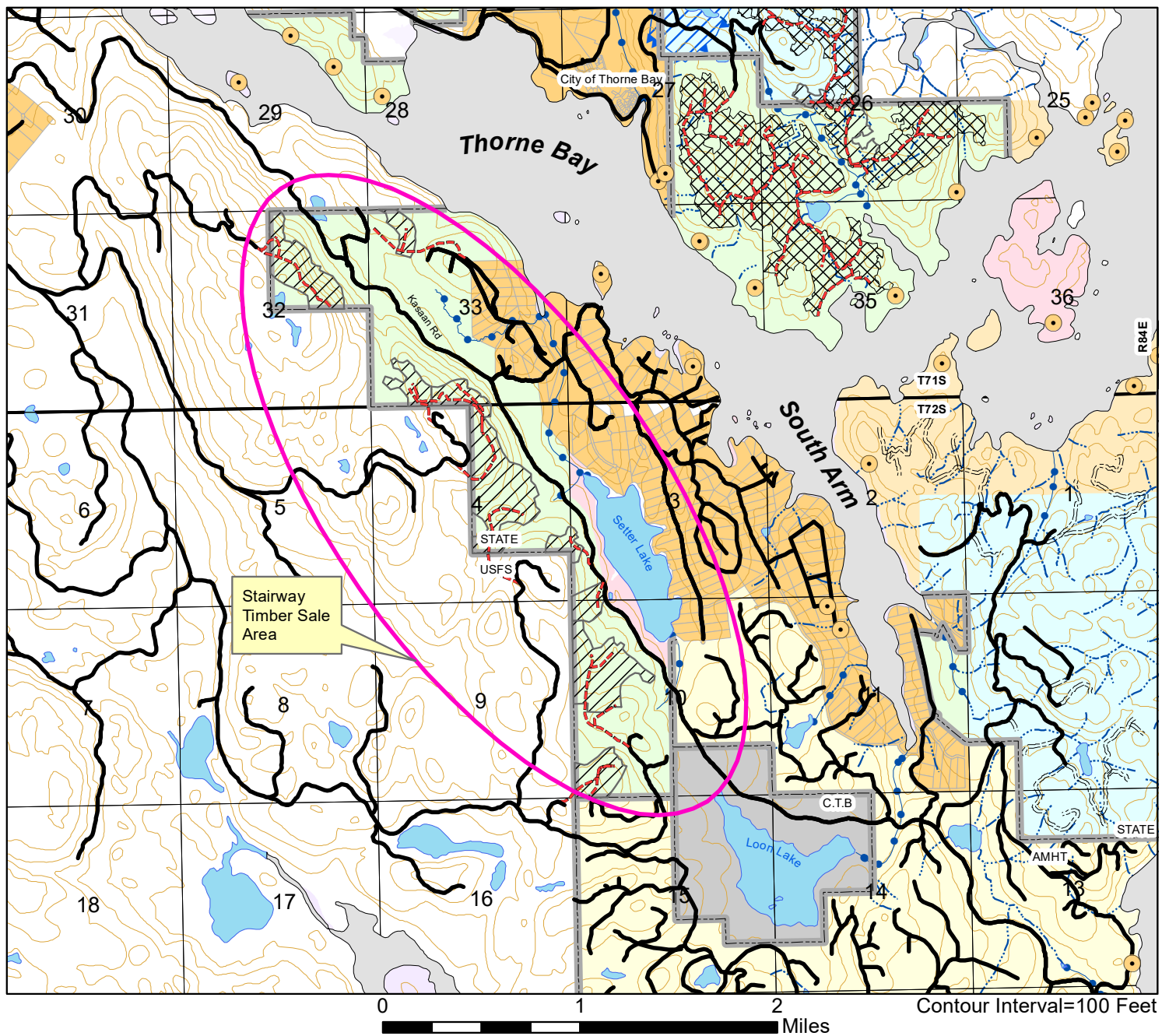


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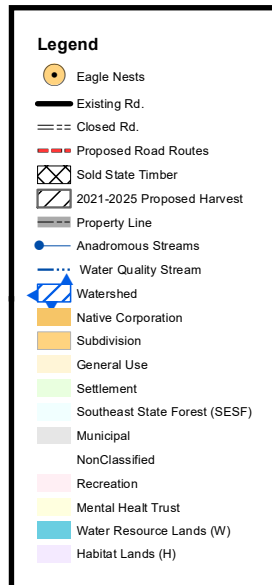
Date: 3/3/2021



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1 in = 6 miles Vicinity Map CRM



SOUTH THORNE BAY AREA **FIVE YEAR SCHEDULE** **OF** **TIMBER SALES** **FISCAL YEARS 2021-2025**

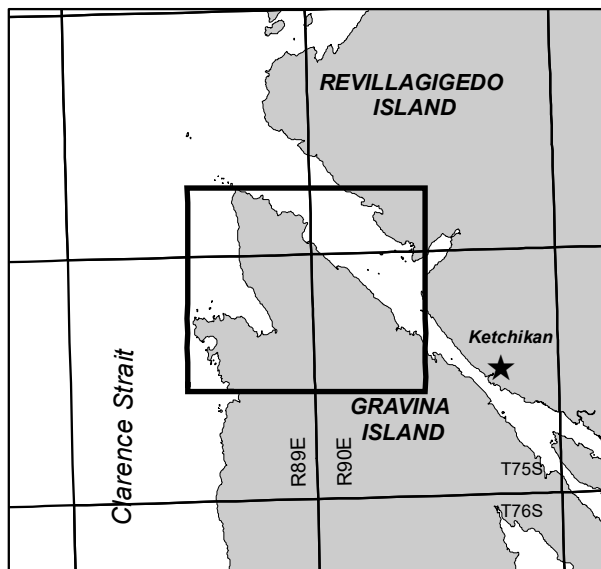
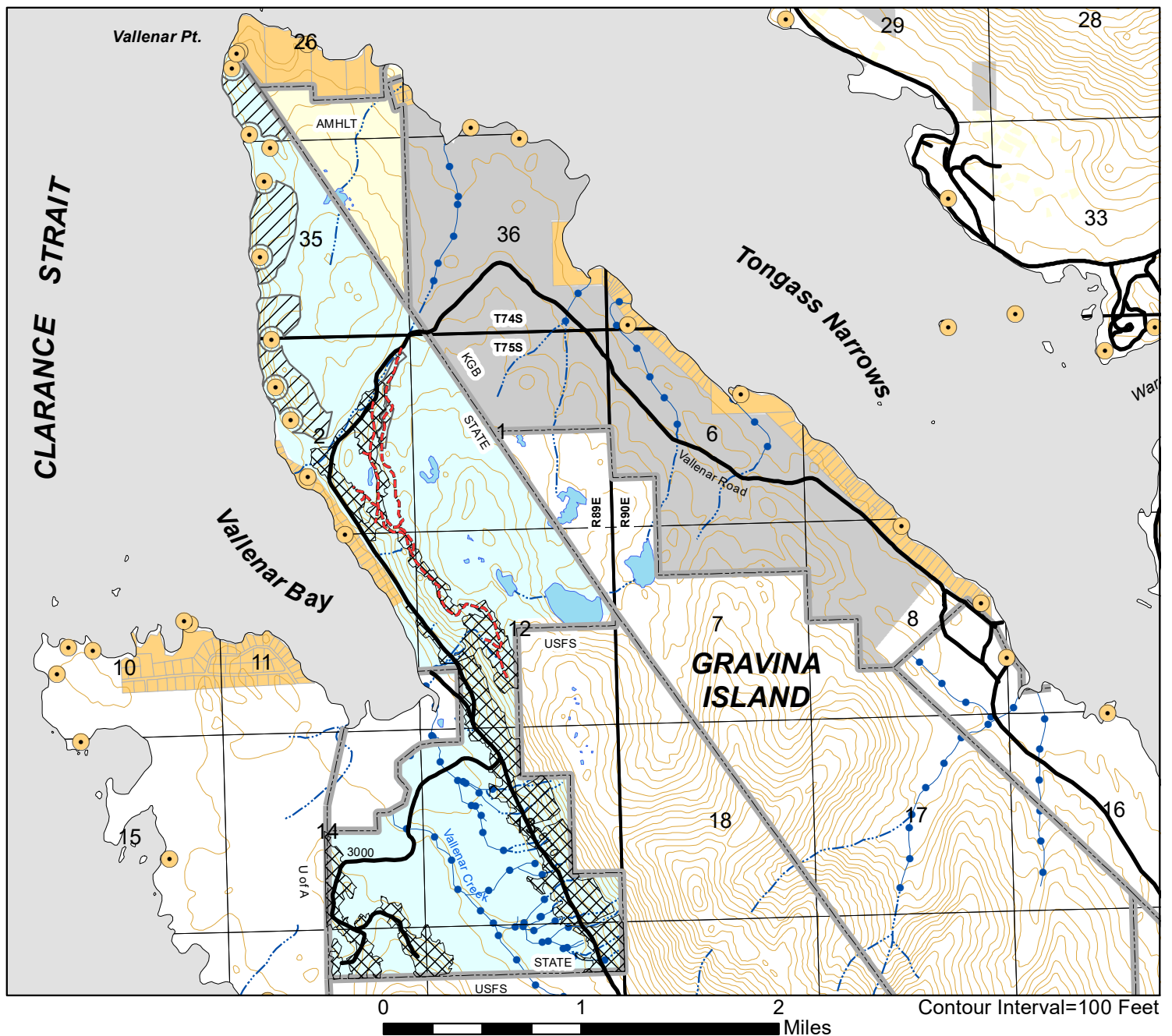


DIVISION OF FORESTRY

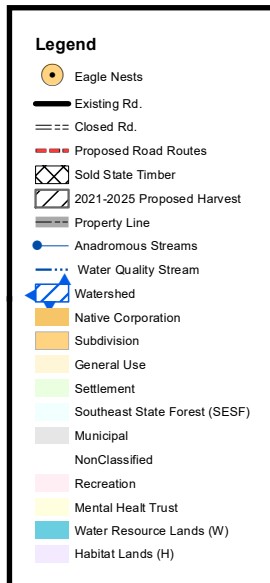
Date: 3/3/2021



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1 in = 5 miles Vicinity Map CRM



VALLENAR BAY AREA FIVE YEAR SCHEDULE OF TIMBER SALES FISCAL YEARS 2021-2025

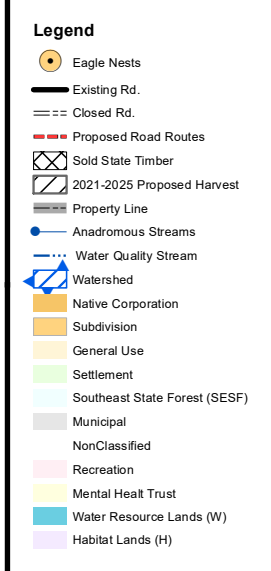
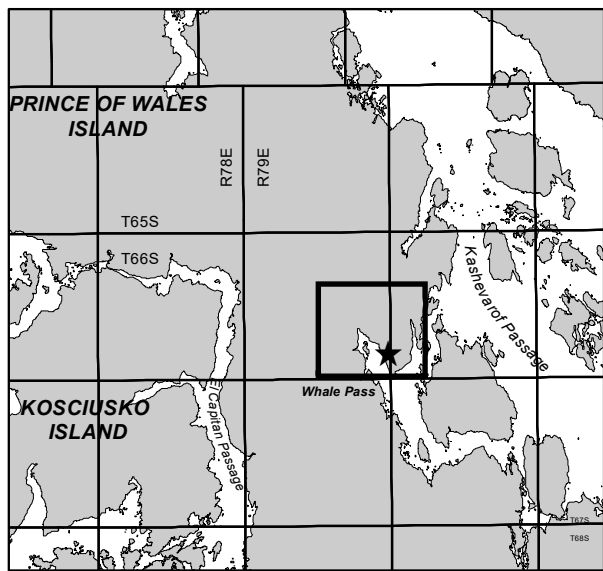
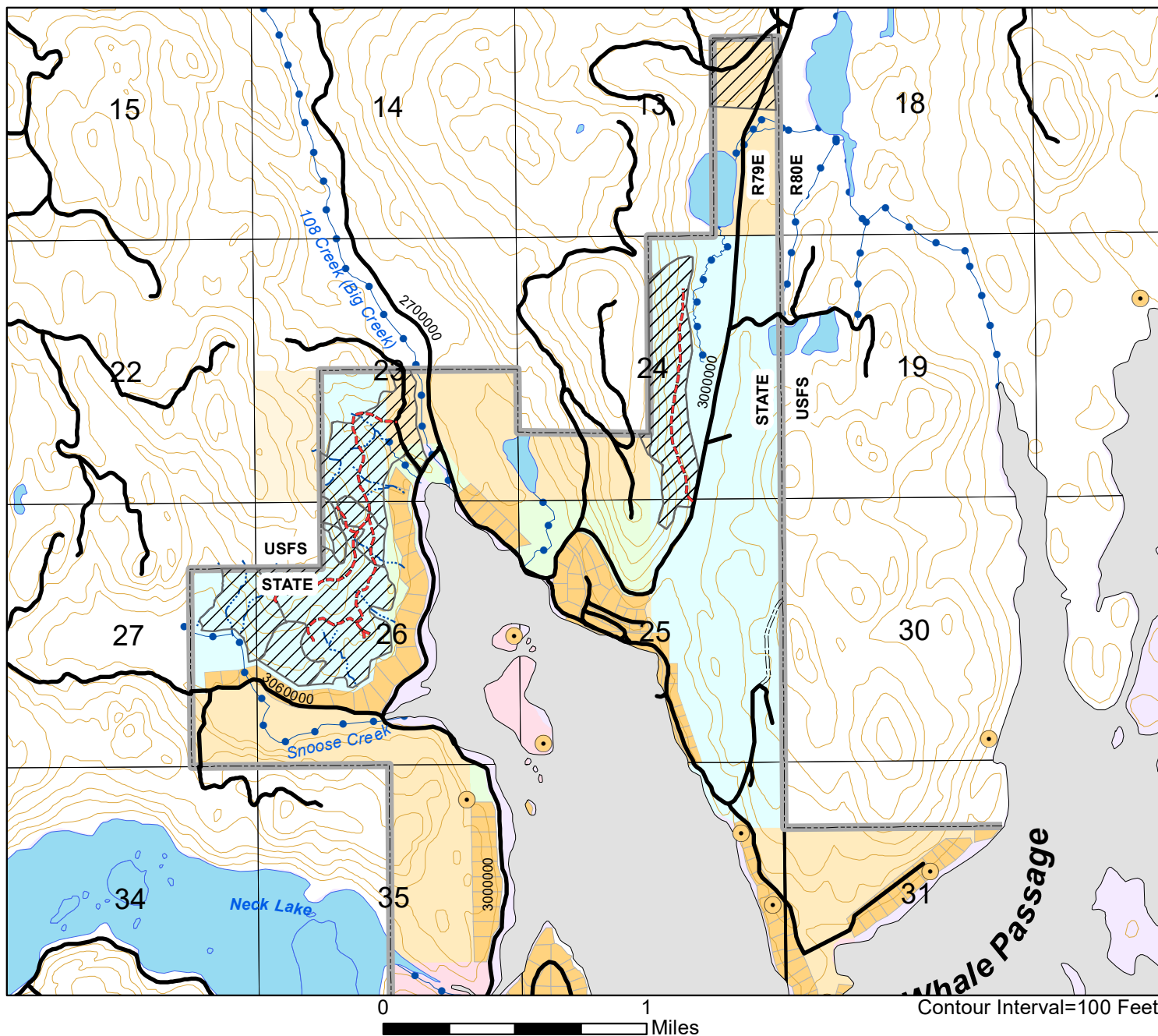


DIVISION OF FORESTRY

Date: 3/3/2021



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WHALE PASS AREA **FIVE YEAR SCHEDULE** **OF** **TIMBER SALES** **FISCAL YEARS 2021-2025**



DIVISION OF FORESTRY

Date: 3/3/2021



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Southern Southeast FYSTS 2021-2025

Comments & Responses

Department of Natural Resources, Division of Forestry

March 2021

The following comments were received during the public comment period on the SSE FYSTS 2021-2025.

Organization	Author	Location
ADFG	Mark Minnillo	Craig
ADFG	Bill Kane/Patrick Fowler	
City of Craig	Jon Bolling	Craig
City of Whale Pass Council	Mayor Cook	Whale Pass
City of Whale Pass Council	Tamara Weaver	Whale Pass
City of Whale Pass Council	Tom Weaver	Whale Pass
City of Whale Pass Council	Brandon Robinson	Whale Pass
City of Whale Pass Council	Caleb Toman	Whale Pass
City of Whale Pass Council	William Pattison	Whale Pass
City of Whale Pass Council	Daryel Donaldson	Whale Pass
	Don Alsup	Whale Pass
	Matthew R. Beck	Whale Pass
	Pamela Beck	Whale Pass
	Brandon Brownson	Whale Pass
	Gary Bull	Whale Pass
	Matthew Cooke	Whale Pass
	Richard Erickson	Whale Pass
	Joseph & Kayley Delmonico	Whale Pass
	Cheryl Fecko	Craig
	James Thomas Greeley	Whale Pass
	Sharon Hillis	Whale Pass
	Scott Hixon	Whale Pass
	Teresa Kaneko	Whale Pass
	Jameson Kohn	
	Karen Petersen	Thorne Bay
Alaska Rainforest Defenders	Larry Edwards	Sitka
SEACC	Sally Schlichting	Juneau

Commenter	Comment	Response
	SITE SPECIFIC	
	<u>Backside Sales</u>	
ADFG	<p><u>Backside Sales:</u> 2 Units (Backside #1 and Backside #2), 93 acres, 1,800 MBF, 1.25 miles of new road.</p> <p>Backside #2 requires road construction to parallel the upper uncatalogued portion of stream 102-70-10740. We would suggest crossing the stream perpendicular further downstream if possible. We would also support helicopter logging methods to avoid road construction altogether.</p>	Comment noted. This information has been added to the file and will be addressed if/when a BIF (or FLUP) is prepared for this area.
	<u>El Capitan</u>	
ADFG	<p><u>El Capitan Passage Area:</u></p> <p>The Habitat Section has previously conducted stream inspections and identified anadromous fish habitat within the sale area.</p>	Comment noted. We are aware of the anadromous streams and will follow FRPA and its BMPs when planning a sale in the area.
Cheryl Fecko	The [cumulative effects] of El Capitan north and south. These areas have already been hit so hard over the years. Why are we going back in there at all?	The area identified is legislatively classified as State Forest, settlement and general use in the Prince of Wales Area Plan. These classifications consider cumulative impact when site specific use occurs. Land use allocation is one of the purposes of land management plans; they account for significant and cumulative impacts. The DOF will consult with ADFG regarding cumulative effects on wildlife in the area.
SEACC	<p>This extensive proposed sale of old growth occurs within a high vulnerability karst area. The groundwater in this karst system likely feeds the nearby surface water bodies visible on the map, including the marked anadromous fish stream. Karst systems are extremely fragile and are easily damaged by heavy equipment, with significant risks of water quality impairment and contamination from leaking equipment and spills. Any silting, debris or industrial pollution can affect the whole aquifer. Further, the extensive roadbuilding required for this sale will cause considerable damage to the karst system. This area should be protected, not logged. Furthermore, a portion of the proposed logging appears to occur in an area designated as recreation. Timber harvest is not compatible with recreation nor anadromous fish streams, which rely on the surrounding old growth habitat for productivity. We strongly oppose this timber sale for these reasons.</p>	<p>The karst system in the area is a known resource and has been documented by the USFS on federal land and to a certain extent on other lands. On-the-ground identification and remote sensing using LIDAR have aided landowners in identifying the resource surface features and the explicit portion of the aquifer. The DOF will work with the USFS to understand the significance of structures and vulnerability. The DOF will manage all actions to maintain long term water quality through the authority of the Alaska Forest Resource and Practices Act to avoid, minimize, and mitigate impacts.</p>

Commenter	Comment	Response
	<u>Control Lake</u>	
Cheryl Fecko	Of particular concern to me is the Control Lake Area where the map shows state land with proposed units and new road construction adjacent to AMHT land that was clear-cut just a few years ago. There are additional units along highway 925 that, although not indicated, I believe are next to young growth units clear-cut by the USFS over the decades. This was incredibly valued Sitka Black Tailed Deer habitat that is being hit too hard from all angles. I am also concerned about the units that are near and surrounding anadromous streams in this area, I believe in the Stanley Creek watershed. Again, Stanley has been hit so hard, and as I understand it the FS plans to go back in and cut again in the future. I really think these state units should be removed until the cumulative impacts of previous and future timber harvests to deer habitat can be properly assessed.	The area identified is legislatively classified as State Forest and general use in the Prince of Wales Area Plan. These classifications are required to address cumulative impact when specific use occurs. Land use allocation in land management plans accounts for cumulative impacts. The DOF will consult with DMLW and specifically with ADFG regarding cumulative effects and their significance.
SEACC	We object to the Control Lake Sale with the State which is adjacent to Mental Health Land that has already been clearcut. The proposed cut blocks add insult to injury, with the MHLT logging of the scenic viewshed of the Control Lake Cabin and the designated scenic byway already changing the experience. This area is a heavily hunted area, especially for people from Craig and Klawock, and any further degradation could damage hunting opportunities. Again, cumulative impacts have not been given enough consideration with regard to habitat, especially old growth dependent species. This area has been a corridor for Sitka black-tailed deer and residents have reported that it used to be a prolific area for deer harvest. The Division of Forest and the Division of Mining Land and Water should reconsider the designation of these parcels for timber harvest.	
	<u>Earl West Cove</u>	
ADFG	<p><u>Earl West Cove Area:</u> 700 Acres, 12,500 MBF, 5 miles of road</p> <p>Although ADF&G has previously determined the extent of anadromous fish habitat in the area, the timber sale map incorrectly displays several anadromous streams as “Water Quality Streams” (see attached map) including:</p> <ul style="list-style-type: none"> - Stream Nos. 107-40-10820, 107-40-10820-2007, 107-40-10820-2008, 107-40-10820-2012, 107-40-10820-2012-3010, 107-40-10820-2018; - Stream No. 107-40-10812; - Stream No. 107-40-10800; - Stream No. 107-40-10794; - Stream No. 107-40-10790; - Stream No. 107-40-10784; 	Thank you. The error referenced was a map data source error and should have been corrected prior to publication. The adopted maps have corrected this error.

Commenter	Comment	Response
	- Stream Nos. 107-40-10780, 107-40-10780-2004, 107-40-10780-2003, 107-40-10780-2013, and 107-40-10780-2002.	
Bill Kane/Patrick Fowler, ADFG	Along with standard buffers and best management practices I was curious if cumulative % of watershed logged (or % of old growth remaining) is considered. With much of the surrounding area being managed by the USFS with prior logging, that might be a consideration for the cumulative health of the Earl West Creek watershed.	The DOF will consult ADFG on the need for old growth habitat relative to the priorities of the State Forest and the overall health of the watershed.
Rainforest Defenders p. 22-23	Not much information on operability or amount of OG... Earl West Creek is important anadromous stream; important for sport fishing and recreation Remaining timber on Wrangell Island are in sensitive travel routes, sensitive watersheds, other important wildlife habitat... Deer habitat already impacted...	The timber is old growth. The DOF has indicated stands that may be operable based on timber type and other typical constraints. The DOF will consult with ADFG regarding fish habitat and cumulative effects to wildlife habitat for species of concern in the area.
	<u>Stairway Sales</u>	
ADFG	<u>Stairway Sales:</u> Catalogued tributaries to Setter Lake may be impacted by middle portion of the sale area.	The DOF will map all surface drainages, manage for water quality, and consult with ADFG on the resource importance as it considers developing the area.
	<u>Naukati Area</u>	
ADFG	<u>Naukati Area:</u> Though some distance from the proposed harvest, catalogued stream 103-90-10240 flows into the head of Kaikli Cove. In addition, there is a small lake located within the southern portion of the harvest area. It is unknown currently if this lake is an anadromous or high-value resident waterbody.	The DOF will map all surface drainages and consult with ADFG as it plans timber sales.
Cheryl Fecko	And poor Naukati, it just doesn't stop for them. Too bad they don't have a famous artist that can hold a sign saving them from the endless clear cuts.	Comment noted. Harvest in Naukati is within the sustained yield/annual allowable cut guidelines for the area...
SEACC	Here again there are multiple ownerships including the U.S. Forest Service and Mental Health with potential for harvest, along with a growing community that would have to share the road with logging trucks and suffer degradation of the hillsides and scenic viewsheds, especially in Little Naukati Bay. The harvests are in areas that are already significantly logged and roaded and will therefore contribute further to habitat fragmentation and loss, spoiling the area for current residents. The Division of Forest and the Division of Mining Land and Water should reconsider the designation of these parcels for timber harvest.	The area identified is legislatively classified as State Forest and general use in the Prince of Wales Area Plan. These classifications are required to address cumulative impact when specific use occurs. Land use allocation in land management plans considers significant cumulative impact. The DOF will consult with DMLW on forest use and specifically with ADFG regarding cumulative affects to wildlife to species of concern in the area.

Commenter	Comment	Response
	Thorne Bay	
ADFG	<u>Bay View (Thorne Bay Area):</u> Habitat has previously conducted stream surveys in the area and all anadromous fish habitat has been identified and accounted for during timber and road layout. It should be noted that catalogued streams 102-70-10720 and 102-70-10720-2007 located in sections 26 and 35 were omitted from the North Thorne Bay Area map.	The error referenced was a data source error and should have been corrected prior to publication. The adopted maps have corrected this error.
Karen Petersen	I have the following comments for the sales offered near Thorne Bay: 1. Please offer all sales up in open bid. 2. Resource concern – deer habitat (people in Thorne Bay – especially youth – hunt in close proximity to town and this will impact the remaining deer habitat since the Forest Service has harvested most of the other lands. a. I would like you to space these sales further apart. Especially with the very large Bayview timber sale – youth from Thorne Bay frequently hike up the Overlook Trail to hunt in this area, or they take quad runners out the Sandy Beach road and hunt the nearest road systems close to town. All of these sales clustered so close together in the proximity of town will greatly reduce the available deer habitat. These are hard times and people rely on subsistence foods more than ever. 3. There are 2 sales offered ABOVE the Southside Road, and I am concerned about the risk of land slide from these sales. 4. Firewood access: I would like the State to require ALL OPERATORS to YUM Yard all material they do not intend to remove from the sale area to the side of the road so that this would be accessible to local people for firewood cutting. This would also clean up the timber sale area making the visual impact not so great, and allow for more rapid regeneration.	1. Open bidding. The DOF publicly notices sales greater than 500 thousand board feet. The DOF “competitively” sells timber when there is interest by more than one operator. This typically takes the form of a request for proposal process that evaluates cost, past value-added activity and proposed domestic sawmill utilization. 2. Resource concern. The DOF will continue to consult with ADFG on habitat needs in the best interest finding and forest land use plan for species of concern. 3. Landslides. The DOF observed the slide and its effect on transportation in the area. We will plan the sale to avoid and minimize the slide risk. 4. Utilization. The DOF has utilization requirements in its timber sale contracts. Utility logs are those logs greater than a #4 sawlog (6” top diameter and 12’ long) that do not meet sawlog standards for utilization. All sawlogs and utility logs are required to be yarded to the road. Purchasers may leave utility logs roadside if markets are not adequate or existent to cover costs. Yarding unmerchantable material (YUM), i.e., logs that do not meet these sawlog or utility utilization requirements, is quite expensive and not needed for reforestation to effectively occur. The residual logging slash serves to stabilize disturbed soils, provides microstructure, and contributes nutrients to the site. The DOF makes firewood permits available after timber sales and monitors use in and out of the permit areas. To date we have not observed complete public utilization of the existing roadside “YUM” material by residents.
SEACC	The sales proposed for the Thorne Bay area seem particularly incompatible with this residential community and appear likely to impact viewsheds and property values. For a community that might seek to cultivate a visitor and	The DOF has conducted public meetings for timber sales in Thorne Bay. We did a viewshed analysis for the Bay View Timber Sale and modified portions of the development to

Commenter	Comment	Response
	recreation industry, these clearcuts will make the area considerably less appealing. We hope that the DOF has plans to conduct public meetings in Thorne Bay before proceeding with these sales.	accommodate aspects of the opinions encountered.
	<u>George Inlet</u>	
ADFG	<u>George Inlet Area</u> : The portion of the sale located on GU lands on the east side of George Inlet surrounds catalogued stream 101-45-10450. This anadromous stream, as well as cataloged streams 101-45-10338, 101-45-10340, 101-45-10350, and 101-45-10360 located within harvest areas, are not shown on the George Inlet Area map. The Habitat Section will assist in determining the extent of anadromous fish habitat.	The adopted maps now show the streams. The DOF will work with ADFG to define habitat during sale development.
Rainforest Defenders p. 22	Cumulative effects, winter habitat for deer, riparian foraging for black bears, bald eagles, small wildlife.	The DOF will consult with DMLW on other uses and specifically with ADFG regarding cumulative effects to wildlife in the area.
	<u>Heceta Area</u>	
ADFG	<u>Heceta Area</u> : The Division of Forestry (DOF) should work with the FS to identify fish passage issues along the FS roads to be used and correct any non-functioning fish passage structures.	The DOF will work with ADFG to define habitat during sale development.
Rainforest Defenders p. 15-16	Area plans for General Use lands are out of date, DOF shouldn't plan sales on GU lands. Fish streams, wolf den likely... Harvesting YG in this FYSTS window is premature, also markets are uncertain.	The DOF uses the best available information and consults stakeholders as it plans timber sales. Area Plans are designed to be relevant for long periods of time, and the general intent of those plans accommodates most change. This long-term view of land use plans, combined with the process of best interest findings and forest land use plans ensures that issues are addressed. The harvest of young growth stands is influenced by market availability, land management goals, timber characteristics and economies of scale. The integration of all these aspects influences the decision of whether to offer the sale.
	<u>Prince of Wales Island sales</u>	
Rainforest Defenders p. 15	Already significant logging on POWI, more planned... Deer and fish populations at risk; should downscale planned clearcutting...	The amount of logging on POW was by design, and meets the requirements for sustained yield. The appropriateness of past harvest was guided by the allocation of resource use in land management plans associated with either federal or state ownership. Risk has been incrementally managed through
Cheryl Fecko	Prince of Wales Island has been hit hard enough for decades. It's time to give it, the wildlife, and the people that depend on an intact forest ecosystem a rest.	

Commenter	Comment	Response
	The resulting fragmentation from the cumulative impacts of both public and private logging is just too great a risk.	specific planning actions.
SEACC	<p>The DOF makes no mention of whether karst features are present in these proposed sales. Considerable portions of El Capitan and Kosciusko Island have high value karst resources which receive special protections on National Forest System land. There should be no difference on non-NFS land. The narratives provided by DOF for these specific sales should acknowledge the karst resources present so that the public can have all the facts. If this information is detailed in another agency document, this is not explained. Since this is the opportunity for the public to provide comment on these proposed sales, the information about karst resources as well as other forest features, such as watersheds and habitat should be presented.</p> <p>On Prince of Wales alone, there are already at least 2800 miles of roads. Forest roads contribute to silting, turbidity and erosion and create stormwater runoff that impacts streams. They routinely contribute to the introduction of invasive species and fragment habitat. Yet the DOF is silent on what measures it takes to minimize construction of additional roads as part of these sales and what it will do to mitigate the impacts for the roads that are created, especially in sensitive karst systems.</p>	This FYSTS is scoping level document. Detailed analyses of watershed and habitat resources is not a requirement of the FYSTS, which is still one of the initial steps of a timber sale process. Further steps in the process, including the Best Interest Finding and the Forest Land Use Plans will address karst in areas with known karst features. The importance of the karst subject is well documented at the federal level. The DOF will work with the USFS to understand the significance of the karst structures and vulnerability of the systems on State land with respect to its proposed actions. The DOF will manage all actions to maintain long term water quality through the authority of the Alaska Forest Resource and Practices Act using avoidance, minimization, and mitigation.
	<u>Kosciusko</u>	
Rainforest Defenders p. 16-20	Edna Bay Sale old grown provides deer winter range, bear denning, and shelters the community of Edna Bay—protected anchorage. Cumulative impacts on deer—affects beach fringe.	<p>These values have been addressed in the best interest finding for the sale. Find it here:</p> <p>http://forestry.alaska.gov/timber/ketchikan</p>
SEACC	This timber sale is adjacent to Mental Health Trust, University and Native corporation lands where extensive logging on some of these ownerships has already occurred. It is also in full view from residential property owners in Edna Bay. The proposed sale further decimates remaining old growth, eliminating habitat in this area. In addition, the sale is underlain by high vulnerability karst, with clearcut logging by heavy equipment posing real risks of irreversible damage and water quality impacts that, combined, can prevent the forest ecosystem from ever returning to its original productive state. The last remaining old growth in this area should be preserved. The DOF acts irresponsibly as a land manager by neglecting consideration of the cumulative impacts of its proposed harvests in conjunction with harvest on adjacent ownerships.	<p>Direct link:</p> <p>http://forestry.alaska.gov/Assets/pdfs/timber/ketchikan_timber/2017/20170324_SSE_1342K_Edna%20Bay%20Parlay_revBIF.pdf</p>

Commenter	Comment	Response
	Gravina	
ADFG	<u>Gravina Island</u> : Access to part of the Bostwick area may require crossing the east fork of Bostwick Creek, cataloged stream 101-27-10360. Habitat Section will work with DOF in the design and permitting of the crossing.	Comment noted, no change required.
Rainforest Defenders p. 21-	At stake is the ecological integrity and public use of an entire significant island, with respect at the least to deer and the sustained use of them, as well as sustaining a wolf population. There has been a failure to sustain the use of deer on the island for a number of years as demonstrated by: low population, a low deer harvest, high effort for number harvested, and ADF&G's move for intensive management of the wolf population. Habitat loss is a factor in the decline in deer.	The DOF has consulted with ADFG and other agencies as well as the public throughout the development of the Gravina area and will continue to do so as sales are planned in the future.
	<u>Whale Pass: Support</u>	
Don Alsup, Whale Pass	...I live in Whale Pass. I run a small store and also am a fishing guide. This letter is in support of the logging plans for land in Whale Pass area. I am in favor of projects that help Whale Pass and the whole island of Prince of Wales for jobs etc. I have looked at the plan and feel the state has taken the necessary precautions to prevent problems with streams contamination. I would like to see this project proceed.	Comment noted, no change required.
	Whale Pass: Subdivision conflicts	
ADFG	<u>Whale Pass Area</u> : The Habitat Section has previously visited the area as part of the planning process.	Comment noted, no change required.
Brownson, Whale Pass	I personally bought my property for the forest behind it being undisturbed and quiet. We as a community will have to stare at a dead clearcut for years if this proposal goes through, not the state. We benefit nothing at all from this except for the hazards stated above and a loss of scenery. There is other timber the state can take that isn't in our backyards. The state isn't going to pay for our property's being damaged due to windfalls; they're not going to pay for us to clearcut our properties due to windfalls. This is the state being greedy for themselves selling timber to where they see is best fit, we live here and have to suffer the consequences from this operation, you guys get to get your money and leave us little people screwed to defend on our own. You're only interested in your best interest and it is nowhere close to the best interest of your community. A hundred foot buffer is way to close. We	This FYSTS is a scoping level document, and the DOF will spend more time with the community of Whale Pass as it develops Best Interest Findings and Forest Land Use Plans to understand property owner concerns.

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	<p>don't want to hear machines, trucks, and saws all day long and we definitely do not want to look at a clearcut. I enjoy seeing the wildlife in my backyard, clearcutting this hill will push that away and once again we suffer from it not you. WE DO NOT WANT THIS.</p>	
City of Whale Pass	<p>We write this letter about a specific section of the proposed timber sale that is located within city limits of Whale Pass. We feel this development has potential to negatively affect property owners who border the area of Snooze Creek to 108 Creek.</p> <p>The proposal indicates a road and subsequent clear-cutting to the hillside of Snoose Mountain, extending from the 108 Creek to the North to Snoose Creek to the South. The area of concern has been highlighted on the map provided to us by the Alaska Division of Forestry (See Attachment). This plan will impact approximately 25-30 properties that are located near or adjacent to these proposed clear-cut areas. We want to make clear that we do not oppose the proposed harvest site north of Whale Pass on Exchange Road.</p> <p><u>After listening to public comment from our community, we urge you to reconsider plans of a Timber Sale within the areas of 108 Creek to the North to Snoose Creek to the South for the following concerns/reasons:</u></p>	
Matthew Cooke	<p>I would like to add my opposition to the timber sale. Fundamentally I am not opposed to timber sales, my issue lies with the proximity of this sale to the Whale Pass community and the disruption this will cause our little town.</p>	
Joseph & Kayley Delmonico	<p>As a resident and one who dreamed of having my own personal property in Alaska I can't imagine looking into Whale Pass Bay and seeing a clear cut. This logging proposal is 100% negatively impacting my property value, personal safety and enjoyment of nature unobstructed. I strongly encourage you to reconsider the logging within our community!!!</p>	
Richard Erickson	<p>On the map showing proposed Whale Pass logging cutting areas, I see the area on the right and left sides of the access road (see above– area outlined with red border) are included in the cutting area. This is not Alaska State Forest land, but State settlement classified land. It should be noted that the lands on the right hand side of the road along 108 Creek are municipal entitlement land selection, and as such, I would protest the clear cutting of these lands, based on the reduced value of clear cut property on subdivision lots. The impact on Whale Pass Scenery would be greater than any of the other cutting areas, due to the land being on the West bank of 108 Creek. As stated in the POW Island Area Plan, settlement land may be subject to timber harvest, though “Timber harvest in these areas must be coordinated with the needs of eventual settlement activity.”</p>	

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	<p>Further, notice to the City of Whale Pass that this proposal would affect our land selections should be given to allow for commenting on the effect on City planning for subdivisions. The City was shorted on road-accessible land available for selection, and this is one of a few tracts that has road access.</p>	
James Thomas Greeley	<p>As an Oyster farmer (Tommaso Shellfish based in WP) and Property owner in the Community of Whale Pass, I write this letter in OPPOSITION to the Whale Pass Timber Sale. This development affects the safety of property and residents that live at the foot of the 700-foot steep slope where the timber sales are proposed.</p> <p>We urge you to withdraw plans of a Timber Sale in this area...</p> <p>The proposed timber sales are a onetime boom for our community. The real cost of the sale is; loss of a rare gem above Whale Pass (Virgin Forest) and an extreme danger of mudslides to the community located below.</p> <p>In this century we have seen the lungs of the earth; the Amazon Jungle and the last remaining temperate rainforest here in the Alexander archipelago cut down at an alarming rate just when the planet needs them most. We as the dominant species of this planet are obligated to preserve the last remaining old growth forests for the health and safety of future generations, Please cancel the proposed Whale Pass timber sales AS 38.05.113 from the Alaska State Division of Forestry.</p>	
Scott Hixon	<p>First of all, I would like to state that my comments do not resonate from a position of environmental protection, anti-logging or an anti-resource utilization agenda. I grew up in a mill town, where logging millwork and transport of products provided the majority of employment for our area. I, also, witnessed the economic devastation that our community experienced after the environmental protection measures were applied which resulted in the forced closures of our entire economy.</p> <p>So, as I much as I appreciate and applaud the state of Alaska in utilizing its timber resources and the local economic benefits it provides, I base my many concerns in view of this particular timber sale being in such close proximity to residential property and houses in our community. Although, my property is not directly impacted, I am deeply concerned for the potentially catastrophic impacts it may have to my neighbors and friends in our community.</p>	
SEACC	<p>SEACC opposes the old growth timber harvests proposed in the vicinity of the Whale Pass community. Two of the proposed harvest blocks are immediately adjacent and upgradient of state land designated as settlement and existing private property owners...</p> <p>Furthermore, based on statements provided by residents at the 8/27/2020</p>	

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	<p>public meeting/teleconference held in Whale Pass with DOF staff, several residents have cited concern that the proposed harvests above their properties are on steep slopes, which will create an erosion risk, may impact drinking water resources, as well as cause windthrow for standing trees on their own property.</p> <p>Harvest in the third block will remove the last remaining old growth in the immediate area and create an eyesore for residents. All three blocks, if harvested will likely impact property values. The Division of Forest and the Division of Mining Land and Water should reconsider the designation of these parcels for timber harvest.</p>	
	<u>Whale Pass: Watershed</u>	
Beck, Whale Pass	<p>We are property owners in the Second-Class City of Whale Pass, Alaska. We own Lot 2, Block 5 Whale Pass Subdivision, Land Survey No 81-217. Our property is adjacent to the proposed Timber sale. We would like to bring to your attention concerns that we personally have that affect our property, and also some that affect others in the community.</p> <p>Whale Pass does not have any municipal water, citizens collect water by either rain catch, streams, or during drought times paying to have potable water delivered. Many years ago a study was done, and due to the rocky terrain, it was determined that municipal water was cost prohibitive. We are only 1 of 3 lots (that we know of) in the city that have documented water rights. In reviewing the map, it appears that there is a road to be built right at the top of our stream. What type of considerations will be taken into account so as not to damage our water source? This would include but not limited to water quality, flow rates, diesel or other substance spills that unfriendly to the water and/or the environment.</p>	<p>The issues raised are addressed as design considerations in the detailed planning process of a timber sale: in the Best Interest Finding/Forest Land Use Plan stages. Given the geology, the topography relative to the timber, the location of the proposed road and the style of road construction, we believe the timber harvest can be considered. A concerted effort during sale reconnaissance was made to locate the road on terrain with benches. This was done to maximize stability, minimize the effect on water quality and ultimately cost. Roads of this style are predominately built on top of the natural sub grade (ground surface) after the tree stumps and other obstructions have been removed. Slash (treetops) are generally used to “corduroy” the roadbed and “float” the running surface of the road, which is typically 2-3 feet of shot rock. Drainages are directed under the road in appropriately sized culverts proximate to their existing channels. Other ground water typically flows under the road as it did prior to construction.</p> <p>The Alaska Forest Resources and Practices Act and Regulations mandates the maintenance of long term water quality during all forest operations. The DOF will address the risk level to surface water quality and flow in the planning process (Best Interest Finding and Forest Land Use Plan) associated with the proposed timber sale.</p> <p>The DOF will work with the DMLW and the property owner</p>
Beck, Whale Pass	<p>we have documented water rights to pull water from the stream that flows through our property. Not sure if this was taken into account,. The way the stream forms is the water seeps from under the top layer of moss and dirt. It does not seem to flow out of the limestone rocks like many areas on the island. Having said this we have a great concern that the clear cutting, along with the road system to remove the logs will destroy the water shed on the hill side.</p>	
Beck, Whale Pass	<p>Third, we are not the only home site here that face the same type of concerns. There are somewhere between 25 and 30 lots that will be affected. I think it's worth noting that while Whale Pass is a second class city we do not have a municipal water source. Therefore all of us do some type of collection of water. It could be rain catch, stream</p>	

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	<p>water, or a combination of both. The loss of the water shed would have a great impact on this community. In discussing this situation with long time residence there are many summers that the water slows to a trickle. The last two years have been a great example of just how sensitive this water shed is and many of the people here lost water for a few weeks. Having heavy equipment and removing trees will have unforeseen consequences.</p>	<p>during to sale planning to accommodate existing water rights.</p> <p>This FYSTS is scoping level document. Detailed analyses of watershed and habitat resources is not a requirement of the FYSTS, which is still one of the initial steps of a timber sale process. Further steps in the process, including the Best Interest Finding and the Forest Land Use Plans will address karst as it explores areas with known karst features. The importance of the karst subject is well documented at the federal level. The DOF will work with the USFS to understand the significance of the karst structures and vulnerability of the systems on State land.</p>
<p>Kaneko, Whale Pass</p>	<p>There is no city water system in Whale Pass, AK; most of the residents in this residential subdivision have historically used water obtained from the existing water streams, creeks and underground springs with some of the parcels having recorded water right permits. Any impacts to the water quality, quantity and flow rates will adversely affect these residents.</p> <p>The clear-cut of timber will cause quicker water run-off with less absorption and increase erosion of sediments impacting these streams, creeks and underground springs.</p>	
<p>Brownson, Joseph & Kayley Delmonico, Whale Pass</p>	<p>Due to the lack of Municipal Water in the City of Whale Pass, residents in this area, heavily rely on personal watersheds to sustainably supply themselves with clean water in their homes. During droughts, we have to ration our water supply. So, in addition to rain catches, these water-sheds serve as a backup water supply during dry summer months.</p> <p>Disturbances from equipment to the soil surrounding these important watersheds during timber harvest will ultimately spoil the water quality and damage this important resource to the property owners.</p> <p>As the City of Whale Pass continues to grow and develop, this area could serve as a resource to supply the community with municipal water in the future.</p>	
<p>City of Whale Pass</p>	<ul style="list-style-type: none"> • The proposed timber sale section, from 108 creek to the North and Snoose creek to the South encroaches on existing watersheds within city limits. • Due to the lack of _Municipal Water in the City of Whale Pass, residents in this area rely heavily on personal watersheds. These watersheds sustainably supply them with clean water in their homes during the more dry summer months when a rain catchment can be insufficient. • Disturbances to the existing water drainage and the potential spill of hazardous fluids from equipment will have a significant impact to the soil surrounding these important watersheds and damage this resource to the property owners. • As the City of Whale Pass continues to grow and develop, this area could serve as a resource to supply the community with municipal water in the future. • There can be no guarantee that an environmental mishap could not 	

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	occur.	
James Thomas Greeley	<p>Due to the lack of Municipal Water in the City of Whale Pass, residents in this area, heavily rely on personal watersheds to sustainably supply themselves with water in their homes. In addition to rain catches, this water shed also serves as a backup water supply during dry summer months.</p> <p>Disturbances from equipment and road building to the soil surrounding these important watersheds during harvest will ultimately spoil the water quality and damage this important resource and pose a mud slide threat to the property owners and residents living below the logging show.</p> <p>As the City of Whale Pass continues to grow and develop, this area could serve as a resource to supply the community with municipal water in the future and is a habitat to many animal and plant species.</p>	
Sharon Hillis	It is difficult to tell from the maps in your draft, but it appears that no other community has logging in such close proximity to private land. Many people are concerned how the clear cutting will affect the watershed.	
Matthew Cooke	As a property owner along the proposed logging area. The water shed that feeds our water system will be impacted and or contaminated by oil and fuel from the equipment.	
Scott Hixon	<p>Potential impacts to an already limited infrastructure and potential impacts to water quality and its source that is relied on by many members of our community, if the work is not conducted with the necessary preventative measures in place. I feel it could be catastrophic to some residents, their associated property and structures.</p> <p>The following is an outline of the primary concerns, I have with possible suggestions to attempt to make the project a success (feasible) for the community rather than a long term mitigation disaster.</p> <p>1) Water Quality</p> <ul style="list-style-type: none"> a. Source Disruption/Alteration <ul style="list-style-type: none"> i. Aquifer Impacts ii. Surface water diversion and/or contamination b. Potential Impact Concerns <ul style="list-style-type: none"> i. No municipal water system in the community and any disruption, contamination, diversion of residential property will be detrimental to future habitation/residency of their property. ii. Health concerns in regards to water borne pathogens and effects on higher risk community members. c. Ensure watershed integrity for residential properties existing down slope of proposed site. d. Geological survey performed to ensure protection of existing 	

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	<p>hydrological features.</p> <p>3) Karst Concerns -A more extensive geological survey study of the area should be conducted to identify any potential areas within the proposed site(s) for the evaluation of any impacts on adjacent residential property that may be impacted in future land instability issues or impacts to existing hydrological features and/or aquifers. Any disruption or redirection of current hydrology or existing aquifers may not only result in impacts to the anadromous streams that border the site, but severely impact residential properties which are all established on the slope directly below the proposed site. Due to the topographic and geologic features of the proposed area, alteration or redirection of the existing hydrological systems may result in catastrophic consequences to the adjacent residential properties in the form of landslides in the future. Moreover, disruption of any aquifer may result in critical impacts to water sources, either supply or quality impacts, to the residents who rely and utilize them.</p> <ul style="list-style-type: none"> a. There are many Karst in the area, regional and local <ul style="list-style-type: none"> i. Regional -Beaver Falls, El Capitan ii. Local- <ul style="list-style-type: none"> 1. Cavern Lake, which is only a few miles upstream on 108 Creek and a boundary anadromous stream to the proposed site. 2. Snoose Creek Road system and USFS Road connected with existing sinkholes. 3. Main Road system has several existing sinkholes at Neck Lake area requiring constant maintenance. 4. USFS Roads -Many surrounding road systems in close proximity to Whale Pass have extensive sinkholes, some you literally cannot see the bottom of. 	
	<u>Whale Pass: Fish streams</u>	
Beck, Whale Pass	<p>There are many small streams in the area that are considered anadromous streams, salmon runs are dropping throughout Alaska, the fragile nature of fish streams needs to be taken into consideration for future generations.</p>	<p>The DOF is required to consider fish resources per the Alaska Forest Resources Practices Act when managing state forest land. The maintenance of water quality is required, as well as other aspects that contribute to maintaining fish habitat. The DOF also provides due deference to the ADFG with respect to fish and wildlife habitat. The FRPA has a track record of excellent implementation that is continually examined for compliance and effectiveness by the DOF and ADFG.</p>

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Kaneko, Whale Pass	<p>1) Detrimental impacts to the multiple existing Anadromous Streams and Water Quality Streams will require environmental mitigations.</p> <p>a. Prior to any realistic cost estimates for the "potential to produce" of this block of timber, the Division of Forestry must produce a detailed site plan delineating the exact locations of all of these existing Anadromous Streams, Water Quality Streams, and underground Springs with the proper proposed clearances for maintaining these critical resources within the impacted harvest</p> <p>c. The anadromous streams adjacent to the clear-cut harvest site are critical to the many current and historic salmon species runs.</p>	The DOF will identify relevant information on fish and other resources as it develops the best interest finding. We will also present an implementation strategy to manage other resources relative to the timber harvest in the Forest Land Use Plan for the timber sale. As mentioned above, DOF also provides due deference to the ADFG with respect to fish and wildlife habitat. The FRPA has a track record of excellent implementation that is continually examined for compliance and effectiveness by the DOF and ADFG.
Scott Hixon	There are also some secondary concerns as to fish and wildlife resources in the area. There are several wild runs of Silver and Chum salmon that are at already critical levels of remnant populations which reside in Snoose Creek and 108 (Big) Creek, both of these creeks border on the boundary of the proposed timber sale. All measures to protect these remnant populations should be implemented. All contributing water sources and main watershed should have an applied adequate buffer.	The DOF will consult with ADFG on the specific vulnerability and risk posed by the timber sale activity on the fish populations referenced.
Scott Hixon	iii. Fish and wildlife -Wild salmon runs must be protected as a community resource.	
	<u>Whale Pass: Wildlife Habitat</u>	
James Thomas Greeley	Flying squirrels and bear dens have been observed and the sale area. Flying squirrels live in the tops of these old growth trees. Bear deer, Ravens, eagles screeching owls' woodpeckers and many other animals live in the undisturbed habitat. In the past few years logging has increased in the Southeast Alaska rainforest. Wildlife and people can coexist utilizing the old growth trees that are more valuable left in place then a quick Buck made harvesting.	The DOF provides due deference to the ADFG Division of Wildlife on the importance of habit for species of concern as it plans timber sales. ADFG has reviewed this FYSTS, your specific comments and will be part of the review of the planning documents (Best Interest Finding and Forest Land Use Plans) for the proposed timber sale.
Sharon Hillis	Another concern is the deer population in Whale Pass. Due to the fact that the Alaska Department of Fish and Game has severely limited the harvest of the wolves on Prince of Wales Island, wolf packs have grown large, and the packs are quite numerous. I have had a wolf within 100 feet of my home trying to lure our dog into the woods to kill her. A few nights ago there were several wolves in the estuary in front of our house howling. Just about every resident in Whale Pass has a wolf story. The wolves are devastating the deer population. Many people depend on deer meat to survive. Taking away the old growth timber will be one more blow to the Sitka black tail deer population in our area. Once an area is harvested trees grow back thickly, and over time the area becomes a	

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	dead zone because there is no browse for the deer to eat.	
	<u>Whale Pass: Buffers and Windthrow</u>	
Beck, Whale Pass	It appears that the normal set back is 100 feet from property lines. We would like to purpose a 300 foot or more set back along the property lines adjacent to this clear-cut area. This would allow for a buffer, for blowdown, allowing for undamaged ground for wildlife and water seepage.	The DOF will examine the area for wind stability concerns as it considers the appropriateness of a retention strategy in the area adjacent to the subdivision.
Kaneko, Whale Pass	2) The typical one hundred (100) foot buffer zone between the clear-cut area and the adjacent residential subdivision is not adequate. Note: Many of the subdivision parcels have structures that legally abut the property lines with no requirements for easements.	
Sharon Hillis	The proposed logging area is in very close proximity to residential lots. I understand that a 100 foot buffer is proposed between the logging area and the property line of private land. This is not nearly enough. I would suggest the buffer should be at least 500 feet to 800 feet. Several times per year Whale Pass is subject to high winds. Once the timber is removed from the mountainside these high winds will cause blow downs in the buffer zone. It will continue onto private land. Residents will have to take down their own trees to protect their own safety.	
Scott Hixon	5) Buffer Zone Considerations to protect residential subdivision by either - a. Adjust buffer zones to align with the topographical peaks above the residential properties located on the down slope side of the project and extend the buffer to all established and potential water quality streams or sources to prevent any potential hydrologic disruption/alteration. OR b. Extend the proposed typical one hundred feet (100') buffer zone to a minimum of five hundred feet (500') or more if applicable and add/extend buffers to all existing water quality streams or sources to prevent any potential hydrologic alteration/disruption.	
Beck, Whale Pass	Whale Pass does experience High winds, clear cutting in the sale area has a direct impact on all property's adjacent.	
Beck, Whale Pass	Second is the potential for wind damage to the trees on our property after the timber from the state sale is removed. Again, the proposed logging is on a hill side and from my limited understanding of trees they depend on each other to battle winds. Once the upper trees in this habitat are removed the remaining trees will become vulnerable.	
Kaneko,	Due to the prevailing wind direction, steep topography, and known historic	

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Whale Pass	record of tree blowdowns in the area after sections of trees have been cut, the typical one hundred (100) foot buffer zone will not be enough distance to prevent the blowdown of these buffer trees onto adjacent residential property. Therefore, there is high potential for personal injury, loss of life or damage to property should a catastrophic tree blowdown take place with these trees within the 100' buffer zone.	
Brownson, Joseph & Kayley Delmonico, Whale Pass	According to the Forest Service Alaska Region (usda.gov), "stands left neighboring to clearcut harvests may experience increased susceptibility to windthrow." We can experience large amounts of rain, and strong, gale-force winds in Whale Pass that can topple vulnerable trees with shallow root systems. The area of the proposed clear-out area is on a steep slope. The standing trees left in buffer zones mapped in this proposal will be at risk to wind damage and could damage neighboring property and endanger residents located near it. Many residents adjacent to the proposed area live year-round and experience these winds during the fall and winter months. The remaining trees will have nowhere to go but down the slope if a windstorm occurs.	
City of Whale Pass	<ul style="list-style-type: none"> The citizens are concerned 100 feet buffer zone will not provide sufficient protection to neighboring properties from Windthrows and Blowdowns. This especially affects the steeper sections of the proposed harvest plan, where the soil is most susceptible to windthrows, blowdowns, and landslides. A section of the proposed clear-cut area is on a steep slope. The standing trees left in buffer zones mapped in this proposal will be at risk to wind damage and could damage neighboring property and endanger residents located near it. Many residents adjacent to the proposed area live year-round and experience these winds during the fall and winter months. The remaining trees will have nowhere to go but down the slope if a windstorm occurs. According to the Forest Service Alaska Region (Forest & Grassland Health, usda.gov), "depending on landscape position, thinned stands or stands adjacent to clear-cut harvests may experience increased susceptibility to windthrow." We can experience large amounts of rain, and strong, gale-force winds in Whale Pass that can topple vulnerable trees with shallow root systems. 	
Matthew Cooke	As a property owner along the proposed logging area, I am also concerned about my trees no longer having a wind buffer from the trees behind my property. This will pose a danger to life and property. Before starting to build our house, we cut tree that posed a danger but many more healthy trees will now be at risk.	
Richard Erickson	We get some very heavy winds and without a substantial buffer zone between the cutting area and adjacent subdivisions, there is a very real risk of blow down	

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	on subdivision lots, particularly if clear cutting is undertaken. At least a 300 foot buffer should be considered.	
James Thomas Greeley	Without the forest we can experience strong, gale force winds that uproot trees. Shallow rooting depth and soil saturation increase this vulnerability. Stands left neighboring to clear-cut harvests may experience increased susceptibility to windthrow (usda.gov, Forest Service Alaska Region). The standing trees left in buffer zones mapped in this proposal will be at risk to wind damage and will damage neighboring property and endanger residents. Many residents adjacent to the proposed area live year-round and experience these winds during the fall and winter months.	
Scott Hixon	The high potential for blowdown and landslides in these areas due to its topography, geological features and prevailing wind events that have been previously experienced in our community. There may be future impacts which are not immediate but can be sustained for many years to come... a. Extend buffers to protect residential property from damage due to prevailing wind events which historically occur and prevent any potential for landslides. b. Adjust buffers to account for topography and geological factors that exist to prevent any possibility of catastrophic events.	
	<u>Whale Pass: Mudslides</u>	
Beck, Whale Pass	Clear cutting without an extended buffer zone will also have a direct effect on the water run-off, may cause additional erosion and less absorption. The summer of 2020 has been abnormally wet, while the summer of 2019 was very dry. Large bare areas at higher topographical heights with many gullies and small streams has the potential to create mud slides, which could be very damaging to those at lower levels. Bare land could cause mud slides for many years, depending on weather conditions, extending potential damage for years to come.	The Alaska Forest Resource and Practices Act has slope stability identification requirements that will be met during timber sale planning. Additionally, the DOF will evaluate the area for stability risk, risk to public safety, property and other resources below the proposed operations from mass soil movement.
Kaneko, Whale Pass	3) Instability of soil will damage residents property. a. The clear-cut timber will cause quicker water run-off with less absorption and increase erosion of sediments. b. The topography is steep in many sections and has already eroded in many areas creating an unstable base.	
Brownson, Joseph & Kayley Delmonico,	There are numerous properties and homes below this proposed Timber Sale. Many are year-round residences. An area of the proposed clear-cut area is on a steep slope on the side of 700 foot Snoose Mountain. Landslides do occur on Prince of Wales Island and can occur in clear cuts. One only needs to drive	

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Whale Pass	<p>along the North Island scenic byway to see landslides caused by heavy rain fall after clear-cutting steep slopes.</p> <p>According to Alaska DNR Geological & Geographical Surveys (DGGS), "Landslide potential depends on a number of factors, including topography (slope), geology, lithology (rock or sed-iment type), vegetation, and water. In August 2015, there were more than 60 landslides in and around Sitka after heavy rains inundated the region. These landslides resulted in three fatalities and substantial damage to infrastructure, including roadways and homes. Landslides are com-mon in Southeast Alaska and the US. Forest service has documented thousands of these fea-tures in Tongass National Forest. "</p> <p>Changes to the soil from drought to extreme rainfall could lead to unstable, highly saturated soil. Prince of Wales Island was impacted in 2018 and 2019, when Southeast Alaska experi-enced extreme drought with months of less than normal rainfall. In 2020, we are now experi-encing wetter conditions. Added disturbances to the terrain from large logging equipment and clear cutting could be potentially hazardous when we experience storms with high wind and rainfall. Parts of the proposed Timber Sale are too close to residential areas and puts our safety and properties (homes) at risk. Damage and devaluation lead to expensive litigation if a disaster occurs.</p>	
City of Whale Pass	<ul style="list-style-type: none"> • We concerned to the proposed clear-cut area on the steep slope on the eastern side of 700 foot Snoose Mountain. Landslides frequently occur on Prince of Wales Island and commonly occur in clear cuts. There are numerous properties and homes below this proposed section of Timber Sale. Many are year-round residences. Damage and devaluation lead to expensive litigation if a disaster occurs. • Changes to the soil from drought to extreme rainfall could lead to unstable, highly saturated soil. Prince of Wales Island was impacted in 2018 and 2019, when Southeast Alaska experienced extreme drought with multiple months of less than normal rainfall. Whereas in 2020, we are now experiencing wetter conditions. These drastic variations in the spectrum from one year to the next, along with the added disturbances to the terrain from large logging equipment and subsequent clear cutting would be potentially hazardous when we experience storms with high wind and rainfall. Parts of the proposed Timber Sale are located on steep hillsides above residential areas and therefore puts public safety and properties (homes) at risk. • Large moving equipment and possible accidents could put residence and property located near and below the proposed Timber Sale at risk for damage and injury if large rocks/boulders are dislodged from the cliffs while logging or while building an access road. The rocks/boulders can topple down the slope, potentially causing damage to homes and putting resident lives at risk. The proposed plan shows an access road to be built along steep hillside 	

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	<p>behind properties with residences (homes).</p> <ul style="list-style-type: none"> According to Alaska DNR Geological & Geographical Surveys (DGGS), "Landslide potential depends on a number of factors, including topography (slope), geology, lithology (rock or sediment type), vegetation, and water. In August 2015, there were more than 60 landslides in and around Sitka after heavy rains inundated the region. These landslides resulted in three fatalities and substantial damage to infrastructure, including roadways and homes. Landslides are common in Southeast Alaska and the US. Forest service has documented thousands of these features in Tongass National Forest. " During the Whale Pass Community Informational Workshop on 8-27-20, it was stated by Mr. Staunton that the report made by the Timber Sale Crew mentioned "questionable sediment and bedrock stability around some of the steeper sections of terrain" and also acknowledged that 2019 was a dry year for Southeast Alaska. 	
James Thomas Greeley	<p>The proposed clear-cut area is on a steep slope on the side of 700 foot mountain.</p> <p>One only needs to drive along the north island scenic byway to see landslides caused by heavy rain gushing down clear-cut steep slopes. In Whale Pass at the base of the above-mentioned mountain are numerous occupied dwellings.</p>	
Sharon Hillis	<p>The proposed road on the west side is along some very steep terrain. Building a road will make this area prone to slides. There are possibly better access points than the one you have proposed. You have not addressed the question as to what will happen to these roads once the proposed logging is completed. Will the roads be water barred, closed, or left open?</p>	
Scott Hixon	<p>b. Slide Potential can be evaluated in various locations</p> <ol style="list-style-type: none"> At 108 Creek in-between the northeast (NE) site boundary of the site and Cavern Lake Falls, the geology proves to be unstable. All SEAlaska site clear cuts on the main Highway to Klawock with similar topography have developed slide areas. 	
Brownson, Joseph & Kayley Delmonico, Whale Pass	<p>Large moving equipment and possible accidents could put residence and property located near and below the proposed Timber Sale at risk for damage and injury if large rocks/boulders are dislodged from the cliffs while logging or while building an access road. The rocks/boulders can topple down the slope, potentially causing damage to homes and putting resident lives at risk. The proposed plan shows an access road to be built behind properties with residences. (homes).</p>	
	<u>Whale Pass: Traffic & Safety</u>	
Beck, Whale	<p>Whale Pass is unique in that it is one of the last traditional logging camps that</p>	<p>The DOF will examine the traffic use in greater depth during</p>

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Pass	<p>remains with a dirt/gravel road, this uniqueness was 1 of many things that drew us to settle here. There is only 1 main roadway thru our small town, there are many blind spots, and narrow parts, and two vehicles passing must both pull over to the edge. During the school year we have children who ride bikes and/or walk along the road back and forth during the day. Many other times there are cars parked along the road side while fishing, hunting or just enjoying the beauty that is Whale Pass. This causes the already narrow road to become even narrower. It would be almost impossible for numerous fully loaded 80,000 lb. Log Trucks and another vehicle to pass, thus turning our already crowded narrow road into seemly a one-way hazardous road. Would there be a need to have flaggers and wait times creating chaos to this quiet community? Truck speed is also a major concern. While the posted speed is 25 even that causes issues in some sections of the roadway. Can the truck speed be lowered? If so to what and who will monitor that? Are there any consequences for not following the guidelines?</p> <p>Our small community store, while not more than a convenience store and the only church are also located along this road and within the subdivision. They are both visited and busy thru out the day and evenings, access to them is a key part of our community.</p>	<p>the planning phase (Best Interest Finding and Forest Land Use Plans). We have conducted timber sale hauling in similar residential environments using a mitigation strategy that involves the community. Understanding traffic types, use levels, and road constraints are some of the fundamentals examined for approaching the issue.</p>
Kaneko, Whale Pass	<p>4) Lack of infrastructure in Whale Pass.</p> <p>a. The only existing road in Whale Pass is a single lane, compacted soil and gravel base.</p> <p>b. Many of the Kindergarten through 12th grade resident children use this road to walk or ride their bikes in order to attend the Whale Pass school which for many will cause them to "share" the road with the timber harvest equipment and operation.</p> <p>c. The only convenience store and church in Whale Pass are located in the subdivision and access to them is important and critical.</p>	
Brownson, Joseph & Kayley Delmonico, Whale Pass	<p>Currently, the narrow gravel road in Whale Pass is maintained inconsistently and will become worse due to increased traffic from traveling log trucks. During the summer, there is an increase of traffic from tourists. It does not take long for pot holes to emerge and often vehicles can be seen swerving to miss them, thus increasing the chance of collision especially on the many blind comers. Increased log truck traffic puts pedestrian safety at immense risk. This is a small community where many residents, including children often walk/ ride bike on the road with friends, family, and pets. Also, many visitors will fish near popular spots along the roads and narrow bridges.</p> <p>The road is narrow with many blind spots and already is a safety risk for both vehicles and pedes-trians. An increase in log truck traffic adds to that</p>	

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	risk. Increased traffic and noise could deter people from wanting to visit Whale Pass.	
Matthew Cooke	Our town is serviced by a small gravel road, having this road clogged up with fast moving logging trucks poses a major danger to vehicles and children that play in close proximity to this road.	
Richard Erickson	The Forest Service grading contractor has told the Forest Service that there is nothing they can do about the poor grading results, due to the lack of surface material to grade – in other words, bad roadbed. The upgrading of the Forest Service road in the STIP has been put off to after 2023. What effect will logging traffic have? The road between the logging areas and the log dump are the community's most heavily traveled roads and have a 25mph speed limit. They are narrow, with some pullouts, and with narrow bridges. The safety of local traffic vs logging trucks is of concern, particularly the Exchange Road hill leading out of Whale Pass.	
Scott Hixon	<p>4) Haul Plan/Road Maintenance/Bridge Integrity</p> <p>a. It is unclear at this time what is the proposed plan.</p> <p>i. Public disclosure and comment period is required.</p> <p>1. Concerns-</p> <p>Road maintenance - Pre/Duration/Post Project with any funding required to city/USFS to ensure proper performance or financial mitigation.</p> <p>Bridge Integrity - Evaluation/Engineering survey performed prior to Haul Plan development with structural engineering specifications provided in the plan for public disclosure and comment. Any loss of bridge infrastructure will be detrimental to the Whale Pass community.</p>	
	<u>Whale Pass: Noise, dust, etc.</u>	
Beck, Whale Pass	Logging at its nature is a noisy business, there are many who are elderly, who work remotely, and some are house bound in the subdivision, creating a huge disruption to the solitude of Whale Pass. Will there be set hours of operation? What about air quality? Odors from numerous trucks, blasting, dust and debris. What will be done to control dust and debris on the main road?	The DOF will work with the community as it develops the harvest plan to identify issues like noise and air quality, in the Best Interest Finding and Forest Land Use Plan stages. We have had similar citizen concerns in the past on other timber sales and successfully mitigated them through operational constraints.
Kaneko, Whale Pass	<p>5) Special consideration needs to be established under the Americans with Disabilities Act of 1990 (ADA) for several residents in this residential subdivision who are disabled and housebound. Critical mitigations are required to monitor and maintain existing:</p> <p>a. Water quality, quantities, and flow rates</p>	

Commenter	Comment	Response
	b. Noise levels, and hours of operations c. Air quality including but not limited to noxious odors, dust, and debris. d. Blowdown of trees	
	<u>Whale Pass: Economics</u>	
Beck, Whale Pass	The Timber sale area adjacent to the subdivision is only 250 acres, are the trees in this area such that it would make sense and be financially smart to log this area?	The proposed plan is based on forest inventory data site reconnaissance.
Matthew Cooke	<p>I see no economic benefit for our community, instead more of a burden. Residents will have to incur expense for dangerous tree removal, solving water issues, additional wear and tear on vehicles that are traveling along these worn roads. This doesn't include possible property damage. Who is liable for such things?</p> <p>This logging will disrupt our community for many months further hurting an already reduced economy.</p>	The intent of the sale is to provide economic gain for the State of Alaska and hopefully regional significant benefits to the commerce of the area. Some benefits may also accrue to the community in the form of opportunities for employment and purchases at island stores. Roads will be maintained to their current state or better.
Richard Erickson	The proposed method of harvest under the current plan is clear cut, as opposed to the prior plan for selective cutting. I think it would be in the best interest of the State and any prospective bidders to identify high value areas of harvest. Since a copy of the scoping contractor's report was not public prior to comment deadline, it is not possible to identify such areas. Reports from local residents who have been in the proposed cutting areas indicate that large areas of marginal harvest exist. But if there are only a few areas of high value timber and the rest is marginal, it would perhaps be better to concentrate on these high value areas for reasons of road construction costs and expense of clear cutting marginal timber areas and getting better value to the State.	Comment noted, no change required at this time. Specific harvest units will be determined at the next planning stages, during Best Interest Finding and Forest Land Use Plan development.
James Thomas Greeley	Second growth trees are not as hardy as the old growth trees located in the timber sales mentioned above. Although the trees here may be not be large enough to meet the outdated forestry threshold for saving old growth trees. New research has found old growth trees contain many defects and are past the stage of producing high grade lumber. Logging has taken place in Southeast Alaska for almost one hundred years. A large percentage of the monoculture trees that have grown back in these previous logged areas are now merchantable timber. A large portion of these second growth stands can now supply the SE AK logging and lumber industry without having to cut timber on steep slopes above communities and take away old growth wildlife habitat.	The DOF has observed that a combination of old growth and young growth harvesting will likely be needed to meet local and regional demands and provide a resource for a feasible timber industry in Southeast Alaska for at least the next decade.
Sharon Hillis	I think that your estimate of a potential harvest of 8000 MBF in this area is questionable. While there are a few small areas with decent timber, most of the timber in the proposed logging area is of low volume and quality and may have	Thank you for your observations. Timber markets are always in a state of flux. Markets have changed significantly since 1983. The State may not sell timber at a loss. Costs of extraction and

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	severe shake because of the high winds. There was a logging company in Whale Pass until 1983. If this timber had been worth harvesting, they would have logged it before the company moved to another location. The cost of building the roads may not be recovered by the poor quality timber that is harvested. I would think the state would be interested in making a profit from the logging rather than breaking even or paying for the logging. Who knows what the timber market will be when this proposed logging may take place?	administration will be recovered from the value of the timber and hopefully additional revenue or values will be contributed to the State, such as infrastructure and jobs. The proposed sale will be appraised several times prior to the sale to guide the selection of a feasible plan.
Scott Hixon	<p>6) City of Whale Pass Benefit/Mitigation(s)/Fiscal Impacts. I would like to see some benefit from this project to our community by either -</p> <ul style="list-style-type: none"> a. Employment opportunities for our residents. b. Utilization of our community businesses i.e. rentals, lodging, resources for road building, equipment services, heavy equipment operators, rock and road materials etc. c. City of Whale Pass fiscal allocation for mitigation(s) and/or infrastructure impacts. d. Would the State ever possibly consider the transfer of timber sale property to the City of Whale Pass post sale or in addition to pending transfer process. e. Improve roads within project infrastructure. 	Your vision for the community benefiting from the sale activity is a reasonable expectation. The DOF would like to think that employment associated with road building or logging would be possible for members of the community with the needed skills. The community is far enough north on the island that the business functions mentioned would be positioned well and could be competitive. As DOF develops its plans we will evaluate the need for infrastructure improvements that might benefit the community and the management of the State Forest over the long term. Based on our operational authority, we are limited in scope and our activities must be primarily associated with forest management. The DOF manages the State's timber resources and specifically the land associated with the legislatively designated State Forest. Turning over the State Forest to the community for development after the timber harvest is contrary to the legislative intent to retain the forest for long term forest use. Other land in the area like General Use or Settlement classified land may be eligible for transfer to the city through other programs administered by the DMLW (municipal entitlements, community use, etc.).
	<u>Whale Pass: Tourism</u>	
Brownson, Joseph & Kayley Delmonico, Whale Pass	We live in this area for many reasons. It is quiet, beautiful, and safe. A logging operation that could potentially last 5 years will no doubt devalue the adjacent properties and disrupt daily life of residents and visitors alike. Many people come to Whale Pass to enjoy the beautiful scenery of the old growth forest on Snoose Mountain and fish in the creeks and rivers nearby. The numerous lodges and rental businesses benefit from these tourists.	Thank you for making DOF aware of the tourist use of the area. The viewshed for tourists and how it will be affected by timber harvest will be addressed in the Best Interest Finding and Forest Land Use Plan stages of the harvest.
James Thomas Greeley	Properties already owned by residents adjacent to the proposed Whale Pass Timber Sale will be devalued. Many people are drawn to Whale Pass and enjoy the beautiful scenery in the old growth forest that is proposed to be leveled. The numerous lodges in Whale Pass have and will benefit from the	

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	tourist industry even if the fish raised in Neck Lake have not returned in their previous numbers, people still enjoy visiting to enjoy the natural temperate rainforest.	
	Comment period	
Richard Erickson	An extension of the comment area of 90 days beyond the Sept.4, 2020 deadline should be considered, in order to get more information distributed regarding the scoping contractor's report and the municipal land selection question.	The FYSTS is a scoping level document designed to guide future planning efforts and provide the public with awareness of possible DOF activities, it is not a decision document. The DOF has been considering a timber sale in the Whale Pass area for more than ten years. Only recently has it built a more specific concept; we will continue to evaluate the feasibility of the sale utilizing the best available data and will communicate to those interested. We anticipate having dialog with the community through forthcoming planning stages, including the Best Interest Finding and Forest Land Use Plans.

	PROGRAMMATIC	
	<u>Format of document</u>	
SEACC	<p>The way in which the FYSTS document is organized is confusing for the reader in several ways. The estimated volume of timber to be harvested is provided within some of the narrative descriptions, but not in others. Additionally, it would be more helpful to organize the sales by geographic area rather than by year. It would also be helpful to provide the map of each selection after the narrative, or at least in the same order as the narrative. Finally, given the relatively small number of young growth acres anticipated to be made available for sale (just 80 acres on Heceta Island), perhaps this could be listed/discussed separately. Finally, the color shading in the map legends identifying different uses/ownerships on the maps is extremely subtle, making it difficult to determine the specific landownership or use designations that are shown.</p>	<p>The DOF prepares its FYSTS according to statute (AS 38.05. 113) and past practice. The document orders its sales on a year-by-year basis because a harvest area must have been in one of the previous two FYSTSs in order to be offered for sale.</p> <p>The estimated volume is described in the narrative when it generally has context to the other information offered. Reiteration of the volume described in the summary spreadsheet offered opportunity for editing errors as timber harvest areas are adjusted, which we programmatically were trying to avoid as much as possible. The volumes and locations are a best guess; we are attempting to provide a rough estimate.</p> <p>We have represented the geographic relationship of the sales in the maps. To represent the maps in-line with the narrative, while feasible, would add to the complexity of the document collation and perhaps length. Based on staffing levels and file sizes of documents, we have traditionally used this format to easily create a separate map package.</p> <p>Thanks for your comments on the color shading on the map. We agree the map could be improved in the legend and will work to improve.</p>
	<u>Timber sale types</u>	
Jameson Kohn & family	<p>We would like to see the smaller business supported. Multiple small sales, 400MBF or so and under would be great. I understand there is a need to support the large mill also, however there is more people employed or self-employed in the small mills on POW. We all deserve equal access to the fiber. We would also be potentially interested in smaller young growth or mixed young growth sales.</p>	<p>Comment noted, no change required. We will address the possibility of small sales in the Best Interest Finding and Forest Land Use Plan phases of the timber harvest.</p>
SEACC	<p>Exclusion of other State Timber Sales in the Schedule</p> <p>The FYSTS states that, “Salvage sales, emergency sales, sales of 160 acres or less, negotiated sales less than 500 thousand board feet (MBF), and personal use permits are exempt from the FYSTS requirements.” We find this is problematic from a transparency standpoint because it prevents the public from seeing the whole picture of sales proposed for a given area.</p>	<p>The language in the FYSTS is based on statute and regulation. The DOF has listed smaller sales that it has discretely considered at the time of the FYSTS. The exempted sale sizes were delineated by the legislature to provide flexibility to respond to forest conditions and market demand for small sales to smaller operators. Sales of less than 500 thousand board feet could be significant, but generally are not considered significant in the areawide planning documents due to their relatively small physical harvest footprint and</p>

	Several sales of 160 acres or less are in fact included in the FYSTS, contrary to the statement. Therefore, why not also include negotiated sales of less than 500 MBF? If the FYSTS is not an appealable document anyway, what is the harm, and the public will benefit.	the due diligence that DOF performs on all sales. When a series of adjacent small sales is considered in a short time window or space, the DOF has indicated them in the document. Regardless of FYSTS presentation, a Best Interest Finding is required on sales containing over 500MBF and a Forest Land Use Plan is required on any sale over 10 acres.
	Wildlife	
ADFG	The FLUPs should clearly identify what timber harvest and road construction activities would occur within 300' of anadromous and high-value resident fish water bodies, and how allowances will be made for important fish and wildlife habitat within this zone. We appreciate notification of multiple sales that may be close enough to function as units of one sale. However, we would appreciate the opportunity to review the location of sales that are less than 10 acres in size, in order to identify any wildlife concerns such as dens or nesting areas.	Noted. The DOF will continue to provide this information.
ADFG	Typical areas of concern to OHMP include harvest activities located near anadromous or high-value resident fish water bodies, estuarine areas, and salt chucks; road building activities impacting anadromous or resident fish water bodies; harvest on slopes greater than 67 percent; high-value deer winter range; wildlife travel corridors; and important wildlife habitats such as denning or nesting areas. As stated above, we would appreciate the opportunity to review the location of sales less than 10 acres in size, in order to identify any wildlife concerns.	Noted. The DOF will continue to provide this information.
Rainforest Defenders	There have long been concerns for deer populations on many central and southern southeast Alaska islands affected by this FYSTS. Clearcutting has destroyed much of the best remaining publicly owned winter deer habitat throughout central and southern southeast Alaska. Further removals could cause local wildlife extirpations and force the few survivors into isolated patches of lower quality habitat.	Noted. The DOF works with ADFG Division of Wildlife to discern the importance of habit to species of concern and the level of protection needed as it plans timber sales.
Cheryl Fecko	Over the years I have seen a constant change and exchange of public lands from the Tongass National Forest into private or state ownership, whether it be to the University of Alaska, Mental Health Trust, Native Village and regional corporations, and the State of Alaska Department of Natural Resources. This is particularly the case on Prince of Wales Island, which has not only seen years of habitat degradation from the massive USFS	

	<p>sales during the pulp mill era, but continued habitat degradation and fragmentation from the timber sales in private or state ownership. Most of these proposed sales are adjacent to previously cut areas that we know will be clear-cut.</p> <p>So whatever wildlife corridors existed before these state and private sales existed are being carved away with this change of ownership. Not enough consideration has been given to the cumulative impacts of these sales, including a number of the sales in the Five-Year Schedule of Timber Sales for the southeast region and specifically those located on Prince of Wales Island.</p>	
SEACC	<p>In general, SEACC opposes the proposed timber sales on 2,828 acres of old growth forest on Prince of Wales. Due to continued logging and roadbuilding on multiple ownerships, including U.S. Forest Service land, Native corporation land, University Land, and Mental Health Trust land, remaining old-growth forests on Prince of Wales are becoming increasingly depleted and fragmented resulting in a significant loss of habitat that is important for many species. These forests will require hundreds of years to return to their original level of ecologic productivity. Old growth forests provide essential habitat for deer, bears, wolves, martens, flying squirrels and goshawk among others as part of a complex ecosystem that also supports thriving watersheds for salmon habitat. The nature of island ecology is that species are confined and cannot travel to new habitat, risking extirpation and irreversible loss of biodiversity.</p>	
	Fish Streams	
Rainforest Defenders	<p>There have been recent and severe declines in pink salmon harvests in southeast Alaska. In 2016 the pink salmon fishery was a disaster, in 2018 returns were far worse, and estimated 2020 harvests are even lower. These declines make it essential to consider whether the need to provide aquatic habitat for fishery resources used by hundreds of local fishermen and processors should take priority over a perceived need to provide raw logs for export by one of the two timber companies who purchase larger timber sales. Concern for fish habitat (p. 8-11)</p>	<p>The Alaska Forest Resources and Practices Act was designed so that no one resource would be unduly impacted in the context of timber and fish use. Numerous studies support the methodology and outcome of the FRPA for the protection of fish habitat through riparian management. While experts are still discerning the cause of the decline in the pink salmon runs, it is not shown to be linked to timber harvest influence on stream habitat. Decline appears to be occurring regardless of the history of the watershed.</p>

	<u>Fish--mapping</u>	
ADFG	The Habitat Section appreciates the quality and clarity of the maps included with the FYSTS. Although the only streams depicted on the FYSTS maps are cataloged anadromous streams and “streams”, we understand that during the FLUP process the “streams” category will be delineated into water quality, resident fish, and high-value resident fish categories.	Noted. The DOF will work with the ADFG as early as feasible to delineate uncatalogued habitat in these areas.
	<u>Wildlife Habitat</u>	
ADFG	Areas encompassed within the Southeast State Forest are used for hunting access for Sitka black-tailed deer; timber harvest activities may affect old growth dependent species (e.g., Sitka black-tailed deer, Queen Charlotte goshawk, and American marten). ADF&G will coordinate with DOF during the Forest Land Use Plan process prior to harvest.	The DOF will work with the ADFG to identify important wildlife habitat and will take appropriate action relative to the resource in planning if it is determined to be critical habitat.
Rainforest Defenders	<p>The FYSTS does not reflect a decision making process that considers whether the proposed old-growth removals are in the best interests of the state in light of adverse impacts to other resource uses. Fish and wildlife habitat, in particular winter habitat for deer, and old-growth habitat for wildlife such as goshawk and wolf and aquatic habitat for recovery of high value and diminishing salmon species should be a primary concern. The agency has a duty to consider and protect these concerns in planning its FYSTS. Timber sales presented in the FYSTS will all worsen already degraded habitat conditions caused by past, present and future industrial clearcutting on the region's multiple forestland ownerships, with substantial long term ecological consequences for wildlife and fish.</p> <p>...</p> <p>The FYSTS must demonstrate the necessary “conscious application” of sustained yield principles relevant to wildlife; however, as examples to the contrary: reconnaissance of most 2021-2025 sale areas is incomplete; dens and raptor nests (other than eagles) are not buffered; there is no consideration of fish and wildlife habitat conditions or population trends in the broader landscape; and there are no provisions to sustain fish and wildlife populations that exist at low levels.</p> <p>...</p> <p>Concern for deer habitat (p. 6-7)</p>	The FYSTS is a scoping document, not a plan or decision document. It estimates where DOF proposes to manage timber and conduct a site specific planning effort in the future. Thank you for your concern for the varied resources. The State addresses the cumulative impacts of timber harvest, including sustained yield of timber and affects of harvest on fish and wildlife species, in area management plans, which also allocate land use. During site specific planning and implementation (Best Interest Findings and Forest Land Use Plans), the Alaska Forest Practices Act is a proven framework to address site management and conflicting issues. The DOF provides due deference to ADFG for input on specific and cumulative effects to wildlife and fisheries from timber harvest. The ADFG has clear authority to assert critical habitat values during timber sale planning.

	<u>FYSTS planning, BIFs, Sustained Yield</u>	
Beck, Whale Pass	The information in the five year proposal was not real clear on how the sites were selected and what research went into the recommendations. Is there a way to get a copy of that ASAP?	The legislature and land managers (through a public process) allocated public land use. The land in the Whale Pass area is one of many areas managed by the State that have identified commercial timber as identified in the State forest inventory process. In a coarse sense, timber type and proximity to infrastructure (roads, sawmills, etc.) are filters in selecting areas to harvest. The forest inventory is periodically updated; in Southeast, this information was last performed on State land in 2019. The work is a combination of analysis done with remote sensing tools and on the ground inspection. The specific proposal identified at Whale Pass in this FYSTS was further explored by consulting foresters directed by DOF in 2019. The contractor focused on identifying timber types, topographic constraints, and estimating operational costs. The tasking used information known at the time. We now know more about the area and will use the information along with public and agency comment to guide future efforts and decisions. The file is available for review and may be requested from Area Forester.
Rainforest Defenders	<p>When implementing timber sales planned under this FYSTS, the DOF must prepare a Best Interest Finding (BIF) and decision showing that the agency has “taken a ‘hard look’ at the salient problems” and “has genuinely engaged in reasonable decision making.” In particular, potential harms to species such as fish and deer that are valuable for subsistence, sport hunting and aesthetic reasons are “salient” problems that a BIF must address in order to ensure that the agency has taken a hard look at important factors.</p> <p>...</p> <p>The larger sales proposed in this FYSTS essentially provide one or two timber operators with a type of monopoly, an exclusive grant or a special privilege that calls into question the constitutionality of this FYSTS. It is our view that the implementation of the FYSTS will result in permanently unsuitable habitat for a variety of forest-dependent species, and thus the agency has abdicated its public trust duty in developing this schedule.</p>	<p>You are correct; after a timber harvest area has been identified in a FYSTS, as this is, DOF can proceed with the next planning stages, the Best Interest Finding and Forest Land Use Plan stages. The DOF systematically engages the public during the development of its management plans. Further it recognizes and works to the best of its ability and authority within the regulatory framework prescribed by the legislature to address salient issues. The DOF provides due deference to ADFG to identify and assert significance of habitat; where it is identified, the DOF adapts its plans to protect it.</p> <p>The range of scale of timber sales on State land reflects the level of commercial interest in the timber. Sales are packaged based on demand and feasibility. Timber is predominately sold competitively (auction) or semi-competitively (request for proposals), and considers a range of values important to the State. The process is designed to be as transparent as possible.</p>
Rainforest Defenders	<p>...</p> <p>The Alaska Constitution requires that state resources – including “[f]ish, forests [and] wildlife,” “be utilized, developed, and maintained on the sustained yield principle.” The FYSTS states that it will meet the sustained yield mandate incorporated into FRPA via AS 38.04.910 by taking a “conservative approach to</p>	While conditions change, the broad view of areawide plans are designed to accommodate change; this combined with the multistep process of planning public land ensures accountability. While the FYSTS is a scoping document, the Best Interest Finding and Forest Land Use Plan are the more site-specific planning documents for each timber sale. As required, area plans can be amended, though a public process, on a site specific basis for new or

	<p>developing the annual allowable cut,” which the DOF manages on a decadal basis so as to not exceed its allowable annual cut as averaged on a ten-year basis. It explains, as have previous FYSTSs, that the planned “higher than allowable cut” is for planning purposes and asserts that it will not be exceeded. The FYSTS identified 47,355 acres of SESF and 27,200 acres of GU lands available for timber harvest, calculating a gross total of 74,555 acres, and then applies reductions in gross total acreage by accounting for riparian buffers, coastal buffers, and other exclusion zones or remote areas to develop a Net Timber Base (NTB) of 33,216 acres, divided by a 100 year rotation to establish an annual allowable cut of 332 acres based on a 2019 inventory. There is an annual allowable cut of 9,147 MBF per year, subject to further refinements. Defenders submits that the Division of Forestry should remove General Use lands from its timber acreage as part of the agency’s responsibilities as trustee of public trust resources and statutory sustained yield and multiple use mandates. The FYST timber sale program includes two land classifications: SESF lands and General Use (GU) lands designated as appropriate for timber harvest. GU allows for timber extraction, but SESF lands have long-term use for “timber management that provides for production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources.” The Area Plans that authorize timber sales in these areas are outdated and preceded significant regional changes which have altered the values of resources for the local economy and the abundance of some resources, and have affected other socio-economic factors.</p>	<p>unanticipated use. General Use land was converted to State Forest in 2010 and 2011, and the Southeast State Forest Plan was subsequently developed and adopted in 2016. Area Plans typically do not categorically exclude specific use on General Use land; they identify the likely and, in some cases, preferred uses and point to important resources to maintain even as other activities occur. General Use classification exists because allocation for a specific use was determined not to be necessary.</p> <p>The DMLW facilitates this public and technical process for area plans and legislative designations (like the State Forest). As conditions change (community growth) or larger projects are proposed, plans are amended to reflect the land constraints and public priorities. The DMLW from time to time removes land out of the GU land base associated with subdivision planning and municipal entitlement. These actions can have impact; overall, they do not prohibit sustained yield management. Periodically, the DOF assesses the land base (after major municipal entitlements, etc.) as well as when it updates the area timber inventory that underpins the annual allowable cut methodology. The DOF last conducted the exercise in 2020, and reduced its annual allowable cut accordingly.</p>
	<u>Cumulative Effects</u>	
Rainforest Defenders	<p>...</p> <p>We have deep concerns about the cumulative effects of logging planned under the FYSTS, in combination with logging also ongoing or planned by the U.S. Forest Service, Sealaska, Alaska Mental Health Trust and University of Alaska land in southern southeast Alaska. The Division of Forestry should carefully consider and discuss cumulative effects at each stage of the planning process. Clearcutting in the biologically relevant vicinity by other landowners – and the legacy of past clearcutting and roading – factors into the effects of DOF’s program on fishery and wildlife resources.</p>	<p>The FYSTS is scoping level document. Appropriate accommodation for cumulative impact is relevant to overall management as projects are developed. The DOF has been tasked by the legislature to manage the timber resource, and it does so while keeping other resources in mind, as required by the Alaska Forest Resources and Practices Act.</p> <p>The DOF has noted your concern for the fish and wildlife resource. The ADFG is aware of your concerns. The DOF provides due deference to ADFG regarding cumulative impact from timber harvest on fish and wildlife resources on public land per the Alaska Forest Resources and Practices Act. The DOF acknowledges that harvest creates changes to habitat; it does not</p>

SEACC	<p>The DOF has an obligation as a forest lands manager to manage its lands for all their values in a way that recognizes that the trees are just one component of a highly interdependent ecosystem. For the harvests proposed on North Prince of Wales near Whale Pass, El Capitan, and Kosciusko Island, the DOF should acknowledge that contiguous high-volume old growth forest in this area has been reduced by 93.8% between 1954 and 2004. From a forest management standpoint, it is irresponsible for the DOF to fail to consider the impacts of continued removal of remaining high volume stands on state land within the larger context of and in conjunction with the harvests that are occurring on adjacent land ownerships.</p> <p>For example, in the Timber Harvest Methodology section of the FYSTS, the DOF fails to acknowledge its role in contributing to loss of habitat from timber harvest and road building or provide any discussion of how it evaluates proposed sales for impacts on habitat values. Limited reference is made to “known resident high value and anadromous stream retention areas,” but the methodology section does not elaborate on this or habitat concerns or the cumulative impacts of continued removal of old growth timber on state lands in addition to that occurring on adjacent land ownerships. When offering a timber sale that is adjacent to areas harvested by other landowners, the DOF should consider how these individual sales and any roads to be constructed further reduce remaining old growth habitat, with effects that include eliminating winter habitat for deer or wildlife corridors for bears.</p>	<p>believe the change is inappropriate relative to the intent of the land base. The significance of the change relative to the health of the archipelago ecosystem is minimal, follows sustained yield principles, and is mitigated by varied land use allocation on the much broader scale of state and federal land bases.</p>
	<u>Tourism</u>	
Rainforest Defenders	<p>Southeast Alaska residents and numerous non-resident businesses rely on the region’s natural capital contained within coastal forest island ecosystems. Cumulatively across all ownerships of forestland in southern Southeast, industrial activities associated with the removal of remaining old-growth forest and implementation of plantation forestry for recovering second-growth forests will also render the region's shorelines and interior areas undesirable or even inhospitable for visitors to the region who come for recreation – particularly sport fishing</p>	<p>The DOF recognizes tourism has value for the local communities. DNR addresses this concern through recreation and tourism designations in area plans, and in analyses of viewsheds during the planning phases of timber harvests (Best Interest Findings and Forest Land Use Plans).</p> <p>As it develops specific projects near communities, DOF consults with local entities to better understand and protect traditional and future uses.</p>

	and hunting.	
	Roads open for firewood harvest	
Jon Bolling, City of Craig	The City of Craig recommends that all logging roads constructed as a result of state timber sales made during the planning period remain open for extended periods of time to permit firewood collection by POW Island residents. Many island residents, including residents of Craig, as well as some area school buildings, are dependent upon firewood as their primary heating source. The city notes that closure of state logging roads shortly after timber harvest is complete does not permit a reasonable opportunity for firewood collection by state residents.	The DOF has attempted to strike a balance on this subject in several of the last sales it has sold through a mix of road management strategies. The DOF is required to maintain the forest roads post-harvest or close them under the authority of the Alaska Forest Practices Act. Some roads pose higher risk for future maintenance costs than others. It is also our observation that some areas are more desirable or suited to long term firewood gathering than others. We have attempted to keep the lower risk roads open after timber harvest for a period of time that the residual wood has value to the public. The cost of maintenance escalates with time, and our funding is not guaranteed for maintenance after a purchaser leaves the sale area. For some roads, it has been prudent to close them at the end of the timber sale while we had the resources at hand to do so. The decision is typically set out in the Forest Land Use Plan.
	Jobs	
Rainforest Defenders p14-15	FYSTS timber sales do not provide jobs for Alaska residents. ...not enough local processing... not enough young people willing to do the jobs...	Thank you for the perspective.
	Export	
Rainforest Defenders p. 14-15	Southeast Alaska mill jobs associated with non-federal timber sales began to decline steeply since 2007, from 63 jobs in 2007 to 24 jobs in 2008. In 2010, non-federal timber supported 7 mill jobs, and by 2011 there were only 3. It is thus unclear how sales proposed by this FYSTS could achieve goals for local manufacturing employment...	The DOF sells timber to local purchasers with domestic processing requirements in the contracts. It is our understanding that locals are employed in these contracts.
SEACC	Local vs. Export Markets The FYSTS states that the Division of Forestry (DOF) intends to target timber sales to local processors as much as possible, but considerably more discussion is given to the role of the export market. The schedule should provide more specifics on volumes that are specifically anticipated for local processing and value-added products which keep small local mills operating and provide jobs in Southeast communities, as well as what percentage of timber harvested from the Southeast State Forest	The State generally markets timber locally based on the direction of the Governor and the Legislature. This is not always feasible for a variety of reasons. Not all logs are equivalent in quality or yield. Timber sales have a variety of costs and the products produced have a range of values. Quantities of scale and market risk influence the path a log takes as it is converted to products. These factors all change with time. Fundamentally, use varies depending on the species and location of the timber. Export of some timber on state sales over the last ten years has been common. The move to export in the round is normally associated with lower quality and smaller diameter logs. The export market is also used when costs are relatively high. Export markets can

	<p>is destined for export. This could be based on the prior five years. This information would provide the public with more transparency about timber market dynamics and the role of the SESF in the local and export markets.</p> <p>The DOF appears to deliberately ignore the export market collapse in its planning but continues to target red cedar and old growth spruce, both of which do not fit the 100 year cycle, much less a purported 65-80 year cycle, as cited in the Timber Methodology section. It is unclear what forests are truly viable from a market standpoint at such a young age, and this appears to be backed up by the fact that the DOF has indefinitely canceled the young growth harvest in the Kosciusko Parley sale, as cited on page 12 of the document.</p>	<p>improve overall timber sale economics by selling logs that otherwise do not provide a positive return in quantities available when milled locally. The state is not authorized to constrain a market in an auction environment; it can negotiate with purchasers to reach an agreement to process timber locally through a negotiated process. The DOF has used this negotiated approach to encourage domestic processing for the last 20 years.</p> <p>While export logs may not provide the milling jobs highlighted, they provide significant jobs associated with harvest. The stumpage from these sales aids the state in funding other resource activities across the state and adds income to communities through support services.</p> <p>To assign a sale in the FYSTS to a particular type of market (export vs domestic) is premature. The DOF discussed the export market in the FYSTS because it is a significant influence on the industry regardless of whether a sale is sold domestically or in the round. Domestically processed wood is largely marketed abroad and influenced by the world commodity market. At the time the FYSTS was written, the outlook included considerable anxiety. The anxiety is still present, but the market has not “collapsed.”</p>
	Karst	
SEACC	<p>The DOF makes no mention of whether karst features are present in these proposed sales. Considerable portions of El Capitan and Kosciusko Island have high value karst resources which receive special protections on National Forest System land. There should be no difference on non-NFS land. The narratives provided by DOF for these specific sales should acknowledge the karst resources present so that the public can have all the facts. If this information is detailed in another agency document, this is not explained. Since this is the opportunity for the public to provide comment on these proposed sales, the information about karst resources as well as other forest features, such as watersheds and habitat should be presented.</p> <p>On Prince of Wales alone, there are already at least 2800 miles of roads.² Forest roads contribute to silting, turbidity and erosion and create stormwater runoff that impacts streams. They routinely contribute to the introduction of invasive species and fragment habitat. Yet the DOF is silent on what measures it takes to minimize construction of additional roads as part of</p>	<p>The DOF has worked with the information developed by the USFS and consulted with geologists to identify karst features on State lands in areas known for that type of formation. We have represented the karst topography and related issues in several planning documents: most recently the Parlay One timber sale FLUP on Kosciusko Island. Sediment movement is counterproductive to long term forest management. The DOF manages roads and harvest activity to minimize sedimentation using the best management practices of the Alaska Forest Practices Act and Regulations with a focus on surface waters. The DOF generally avoids pronounced karst features and evaluates karst significance on a case by case basis given the capacity of the topography to influence drainage and water quality directly and indirectly.</p>

	these sales and what it will do to mitigate the impacts for the roads that are created, especially in sensitive karst systems.	
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