

STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF FORESTRY



SOUTHEAST AREA

**BEST INTEREST FINDING AND
DECISION FOR
BAY VIEW TIMBER SALE
SSE-1369-K**

May 2020

Abbreviations

ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
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
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
UA	University of Alaska
USFS	United States Forest Service

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I. PROPOSED ACTION

The Division of Forestry (DOF) is proposing to offer for sale approximately 587 acres of mature old growth timber composed of western hemlock, Sitka spruce, western red cedar and Alaska yellow cedar from state lands on Prince of Wales Island (POW), centered approximately one mile east of the City of Thorne Bay (see Appendix A, Timber Sale Area Map). The volume to be offered totals approximately 14,600 thousand board feet (MBF). The DOF proposes to sell the commercial timber in one or more negotiated sales under provisions of AS 38.05.115 or AS 38.05.118. The AS 38.05.115 authority will be used for sales less than 500 MBF while AS 38.05.118 will be used for sales greater than 500 MBF. Negotiated timber sale methods have been chosen because of the State's interest in encouraging employment on POW by processing as much of the timber locally as feasible. The AS 38.05.123 (high value added) process was listed as a possible method of sale in the Preliminary Best Interest Finding; because the DOF received no comment requesting the timber to be sold using the distinct requirements of the AS 38.05.123, it is focusing on using the AS 38.05.115 and .118 authority. The sale will be noticed as required by sale type authority per AS 38.05.945 prior to being sold. The DOF has received interest in the timber from several mills, consequently the DOF will use its typical request for proposal process (RFP) to determine the specific purchaser(s) with whom to negotiate. The RFP process will consider the track record of the purchaser to locally manufacture wood products (AS 38.05.118), the proposed quantity of value added wood products to be produced, the projected payroll associated with processing the sale, and the proposed stumpage rates.

Selling the timber in an open and competitive manner using the AS 38.05.120 authority in Southeast Alaska would likely generate higher stumpage revenue to the State. Purchasers of competitive sales typically use the round log export market and obtain higher returns on their investment. A competitive sale using the AS.05.120 authority could not be constrained through contract language to use local mills as much as feasible.

The management objectives for the proposed timber sales are:

1. To follow the Alaska Department of Natural Resources' (ADNR) constitutional mandate to encourage the development of the State's renewable resources, making them available for maximum use consistent with the public interest;
2. To help the State's economy by providing royalties to the State in the form of stumpage receipts, an infusion to the State's economy through wages, purchases, jobs, and business;
3. To help the local economy of the communities within southern Southeast Alaska by creating additional jobs in Southeast Alaska due to the combination of road building, logging, trucking and potentially milling;
4. To harvest timber from future subdivision areas to promote economic development and minimize public risk; and
5. To minimize infrastructure development costs in the area though long range planning.

II. STATUTORY AND REGULATORY AUTHORITY

The Division is taking this action under the authority of

- AS 38.05.035(e) Best Interest Finding;
- AS 38.05.110-120 and 11 AAC 71, Timber Sale Statutes and Regulations; and

- AS 41.17.010-950 and 11 AAC 95, Forest Resources and Practices Statutes and Regulations.

III. ADMINISTRATIVE RECORD

The Division will maintain an administrative record regarding the decision of whether or not to proceed with the action as proposed. This record will be maintained at the DOF's Southern Southeast Area Office filed as SSE-1369-K.

IV. SCOPE OF DECISION

This final best interest finding (BIF) is part three of a six-part process to design, sell, and administer timber sales. This BIF covers the sale of approximately 587 acres of mature old growth forest composed of western hemlock, Sitka spruce, western red cedar and Alaska yellow cedar on state land within the perimeter of the project area (see Appendix A1, Timber Sale Area Map). The following list summarizes the overall process:

Part 1: Regional Planning. The Department of Natural Resources develops area plans and state forest management plans to designate appropriate uses for state land, classify the land accordingly, and establish management guidelines for multiple use. These plans determine where timber sales are an allowed use, and what other uses must be considered when designing and implementing timber sales. Subsequent land use decisions must be consistent with provisions contained within the applicable area and/or forest plans. The project area in this BIF is covered by both the Thorne Bay North Unit of the Southeast State Forest Management Plan (SESFMP) and the Thorne Bay Subunit of the Prince of Wales Island Area Plan (POWIAP). Additionally, most of the project area is within the boundary of the City of Thorne Bay.

Part 2: Five-year Schedule of Timber Sales (AS 38.05.113). The Southern Southeast Area Office prepares a Five Year Schedule of Timber Sales (FYSTS) every other year. The Schedule identifies proposed sales, including their location, volume, and main access routes. The FYSTS is a scoping document that provides an opportunity for public, agency, and industry to identify potential issues and areas of interest for further consideration in the BIF. Under AS 38.05.113, proposed timber sales within the area covered by this BIF must appear in at least one of the two FYSTSs preceding the sale. The proposed timber sale area was included in the 2013-2017; the 2015-2019; and the 2018-2022 FYSTSs.¹

Part 3: Best Interest Finding (AS 38.05.035(e)). DOF must adopt a final BIF before selling timber. A best interest finding is the decision document that:

- Ensures that the best interest of the State will be served by this proposed action.
- 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 the sale,
- Sets the overall harvest and reforestation strategy for the sale area,

¹ The POWIAP (Chapter 2) required noticing harvests in two FYSTS based on the applicable statute at the time. In 2003, the statute was changed to the current standard of at least one FYSTS.

- 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 the sale price.

DOF issued a Preliminary BIF to sell approximately 4,000 MBF of old growth in part of the project area by negotiated commercial sales on January 14, 2014 from State Forest land in a sale titled North Thorne Bay #4 (SSE-1322-K). That preliminary decision, framed in 2014, was not finalized due to staff reductions and department priorities. The file for that sale was officially closed in a memo to the file on July 12, 2019. However, DOF reviewed the file, including the written comments received during the review period, and then considered those comments in the development of the preliminary BIF.

Part 4: Forest Land Use Plans (AS 38.05.112). 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. DOF will prepare a FLUP for harvest areas within the overall sale area covered by this best interest finding. The FLUP will specify the site, size, timing, and harvest methods for harvest units within the sale area. The FLUP will also address site-specific requirements for access construction and maintenance, reforestation, and multiple use management. The Draft FLUP will be based on additional field work and site-specific analyses by the DOF. Appropriate regulatory agencies are consulted, and the plan is subject to public review. The timber sale FLUP will consider the cumulative impacts in the project area as each sale is designed and sold.

Part 5: Timber Sales and Contracts. Following adoption of the final BIF, the DOF may offer the timber for sale using the identified authority. The Division will sign a contract with the purchaser for each sale. The contract will include stipulations to ensure compliance with the BIF, FLUP, and statutory requirements.

Part 6: Sale Administration. DOF will administer the timber sales and conduct field inspections to ensure compliance with the final BIF, FLUP, timber sale contract, and applicable laws, including the Alaska Forest Resources and Practices Act (FRPA) and regulations (AS 41.17 and 11 AAC 95), and forest management statutes and regulations in AS 38.05 and 11 AAC 71.

V. PROJECT LOCATION, LAND STATUS, AND DESCRIPTION

A. Location

The timber sale area is found within Sections 22, 23, 25, 26, 27, 34, and 35, Township 71 South, Range 84 East, Copper River Meridian (CRM). The sale area is found within the Craig C-2 USGS quadrangle. See attached map titled: Attachment A, SSE-1369 K Bay View Timber Sale Harvest Area Map.

B. Title status

The sale area lands were granted to the State through National Forest Community Grant 353.

C. Land use planning, classification, and management intent

The whole harvest area is within the geographic region covered by the POWIAP. The area in this BIF is covered by the Thorne Bay Subunit 11c in the POWIAP and the Thorne Bay Unit in the Southeast State Forest Management Plan. The land classification for most of the area outside of the State Forest is Settlement Use under the POWIAP. The DOF is the land manager for the SESF; the DMLW is the land manager for all other lands in this timber sale. The DOF is the forest resource manager for all State land contained in the timber sale. The specific management intent for the uses in the areas follow (excerpted from the plans):

POWIAP

THORNE BAY UNIT 11c

MANAGEMENT INTENT AND GUIDELINES

State lands will be managed for multiple use, with an emphasis on meeting the expansion needs of the Thorne Bay community. State uplands north of Thorne Bay and state selected land west of Tolstoi Bay are to be managed for a variety of uses and are designated General Use. Settlement and other associated development is not expected to occur in these areas during the 20-year life of the plan. Depending upon location, portions of these lands may be used for water resources, timber harvest and community recreation. Settlement is expected to concentrate southeast of the community in areas designated "Settlement," primarily within Sections 34 and 35, during this planning period.

Lands at Thorne Bay previously closed to mineral entry and included in the developed city of Thorne Bay or in residential subdivisions will remain closed. In addition, about 500 acres of land designated Settlement, situated next to residential subdivisions, are recommended for mineral closure. These closures are made to avoid significant conflicts with surface activities.

FISH AND WILDLIFE

Land designated fish and wildlife habitat and harvest will be managed to avoid significant impacts to habitats and traditional harvest activities. Impacts on non-designated community harvest areas should be considered when authorizing activities (see *plan* Map 1-1).

FLOATHOMES

Residential floathomes are encouraged to locate in designated floathome areas or where impacts on existing resources or values can be minimized. Primary designations for floathomes are located in outer Thorne Bay, where most of the existing floathomes are located.

FORESTRY

Areas designated Settlement to the south of the city along the Tolstoi Road and east of the city in Sections 34, and 35 adjacent to the coast are appropriate for residential development, and it is likely that selected timber harvest will precede subdivision development. It will be necessary to coordinate the harvest units and logging road designs in order to be consistent with eventual residential development. Harvest activity cannot occur within 300 feet of Water Lake, the community's water supply source.

MINERALS

Because of conflicts with surface activities, state-owned lands within state subdivisions (ASLS 80-121 and ASLS 82-139), areas designated settlement-commercial, and municipal lands are closed to mineral entry.

RECREATION

Several tracts within the state subdivision south of Thorne Bay are designated public recreation. Other activities should not be authorized if they will preclude the recreation use of these tracts. Other state uplands in the Thorne Bay area do not have significant recreation values identified. The Southeast Regional Office should work with the City of Thorne Bay to ensure that community and public recreation are considered when land offerings are designed. State tidelands and submerged lands at Snug Anchorage will be managed for community recreation and anchorages. State uplands, tidelands, and submerged lands designated recreation will be managed to preserve or improve recreational activities and values.

SETTLEMENT

The department will work with the City of Thorne Bay when authorizing commercial activities, locating public facilities, and planning land disposals. The plan designates the area to the southeast of the sewage treatment plant along the coast as “S” (Settlement) and residential development is expected during the planning period. This area is to be developed before other areas of potential settlement identified under the General Use designation.

Primary management objectives are:

- 1) Not Applicable/ omitted as reference here (concerns industrial land disposal in another location).
- 2) Plan for residential land disposal. When funding becomes available, the next residential disposal area should be east of the present Thorne Bay townsite in Sections 34 and 35, T71S, R84E.
- 3) Not Applicable/ omitted as reference here (concerns retained State lots in existing subdivisions).

SOUTHEAST STATE FOREST PLAN

The proposed harvest area north of the middle of Section 26 is within the legislatively designated Southeast State Forest (SESF). The primary purpose for the legislatively designated Southeast State Forest is timber management (AS 41.17.200); provisions of area plans do not apply within legislatively designated areas such as state forests. The SESFMP was adopted on February 29, 2016.

“AS 41.17.200. State forest purposes and management. (a) The purpose of AS 41.17.200 - 41.17.230 is to permit the establishment of designated state-owned or acquired land and water areas as state forests. The primary purpose in the establishment of state forests is timber management that provides for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources. (b) In managing a state forest, the commissioner shall, consistent with the primary purpose of a state forest under (a) of this section, restrict the public use of the land and its resources, including timber, fish and wildlife, and minerals, only when necessary to carry out the purposes of this chapter.”

D. Current access and land use

The main overland (road) access for this sale area is through the Alaska Highway System. The sale area is located off of the Sandy Beach Road (USFS 3000 RD) on the Prince of Wales road system, or directly from the community of Thorne Bay. The eastern portions of the proposed sale area are more readily accessed by saltwater from Thorne Bay.

The adjacent public landowners are the United States Forest Service and the second-class City of Thorne Bay.

The City of Thorne Bay has its municipal drinking water intake in a small lake on State Forest land to the west of the harvest area in Section 22 and 27; portions of the watershed were logged approximately 30 years ago by the USFS, and those harvested areas presently support well-stocked second growth timber stands. No harvesting of timber, hauling, or road construction is proposed in the watershed that contributes to the municipal water system.

The DOF has sold several timber sales in the area to the north of this project area over the last 19 years and has also pre-commercially thinned several large blocks of second growth timber in areas previously harvested by the USFS. The tract's primary purpose north of the middle of Section 26 is for forest management.

The USFS managed the project area prior to State conveyance and conducted timber harvest and other forest management activities in the area during the 50 years prior to State conveyance; the project area contains numerous forest roads managed both by the USFS and State. The USFS has sold several timber sales to the north and west of the project area in the last five years.

The area behind the city experiences incidental use by the public for a variety of uses related to semi-remote recreation including, but not limited to, berry picking, hiking and hunting. A short trail from behind the grocery store climbs to the old logging road on city land on the west side of the tract. During scoping, city administration indicated the community use of the gravelly beaches on the south side of the tract for informal gatherings.

Floathouses are located in the more protected coves of the tidelands on the southeast side of the area. These floathouses appear to be used seasonally or are in a storage or abandoned state. A charter fishing operation was observed preparing for seasonal operations based out of the floathouse near Stream 102-70-10720. Several freshwater streams located in estuary areas near floathouses showed evidence of previous use of stream water by the floathouse residents; all water pipe infrastructure observed in the uplands was in a state of disrepair and apparently unused, with the exception of the pipe system located on Stream 102-70-10720.

The Thorne Bay waterbody is commonly used by the community for general access and serves as backdrop for many activities in the community. Additionally, the community is divided geographically by the bay. Most commercial services are located on the north side. The south side of the bay contains a significant number of residential lots; these residents commute to the north side by water or a relatively long drive on the Kasaan/ Thorne Bay Road.

The visitor industry uses the bay daily in different forms during the summer. Several fishing lodges on the south side have views of the north side of the bay and access Clarence Strait via the bay. A small cruise ship tour operator visited the community during the summer of 2019 as part of their experience of visiting Southeast Alaska.

E. Background and description of proposal

1. Background:

The State seeks to use State Forest land on Prince of Wales Island to encourage sustainable development of the State's forest resources, making timber available for sale and harvest. The demand for State timber is currently significant due to the decrease and uncertainty of the federal timber supply. A diversified economy with a timber industry component is important to southeast Alaska. By direction from the Governor and Legislature, the Division of Forestry manages a timber sale program that makes timber volume available to help sustain the region's timber industry and economy.

The majority of the State land base in southeast Alaska is remote. The Thorne Bay area contains a large amount of raw land but is relatively proximate to the existing road system and offers forest resource values close to the remaining mills and processing facilities. Thorne Bay is also home to a skilled local work force.

The legislature designated the northern part of the area as State Forest in 2010 and 2011. The DOF has been managing this portion of the project area for forest management since that time.

The DOF, in collaboration with the DMLW, identified the area south of the state forest as having potential for timber harvest to support the long term development of the area for settlement. DNR interprets this to mean that existing road access is beneficial to the economics and practicality of a settlement project. The timber sale is projected to develop the pioneer access generally needed for permanent roads and economical survey work associated with subdivision development. The roads provide physical access for lot development and facilitate road right of way construction that is not solely dependent on high initial private or government startup capital. Additionally, while forest values are recognized as desirable to the Alaskan experience, the removal of large trees proximate to building sites, utilities and roads is generally beneficial to safer development of land, particularly in Southeast.

Where timber exists in the tract, it was generally considered appropriate to include it in order to contribute to the revenue of the project if it did not significantly detract from other resources. It thus provides revenue and scale to timber purchasers in developing the roads to the extent necessary in the tract.

It was determined through the project process that some areas classified as Settlement are likely not suitable for a subdivision because of the terrain or other present resources (such as streams). In these areas, the land and roads will likely serve in the long term to support forest values. Some of the area could support future silvicultural management if compatible with the adjacent uses when the timber reaches merchantability again.

2. Timber Volume and Sustained Yield:

The total estimated saw log volume identified in the sale area is 14,600 MBF based on staff estimates. Of this, approximately 3,200 MBF is located on State Forest land.

The Division of Forestry is required to manage its timber harvest on State Forest and General Use classified land on a sustained yield basis. “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. This is done to allow for market fluctuations and operational restrictions. Based on the DOF inventory of the land and the timber base, it uses an annual allowable cut of 11,200 MBF per year for the Southern Southeast Area. Timber sales that are sold in the Southeast Area will remain within the constraints of the allowable cut and will comply with sustained yield requirements at the time they are sold. The duration of the timber sale contract(s) will be governed by the economic conditions at the time of the sale. This timber sale is well within the annual allowable cut for managed state forest land.

Timber harvest areas located on Settlement-classified land are not managed on a sustained yield basis because the State’s primary focus for those lands is eventual disposal and divestiture from State ownership.

3. Harvest Unit Design:

All harvest sale area units have been designed for clear-cut harvest using conventional shovel logging and high lead cable yarding methods. The clear-cut silvicultural action is common in Southeast Alaska. Due to the variability of the existing stands of timber and the constraining topography, the unit lines generally are irregular in edge appearance and provide elements of structure to the units as they reforest. Clear-cut harvest is used for a variety of reasons. Categorically it yields a positive forest growing conditions in most of southeast Alaska from the standpoint of growing timber. Typically, they also yield the most return on the investment in the road constructed and the costs associated with the logging. From a safety standpoint they are safer and thus more cost effective to manage during logging because of the reduction in hazards compared to partial cuts.

While other prescriptions such as a partial-cuts may provide a level of retained forest values, the forest generally responds more slowly due to the diminished light available for growth. Post-harvest wind through in these stands caused by added turbulence created by an irregular opening also tends to present a post-harvest risk by disrupting regeneration at undefined intervals and potentially not utilizing the timber resource.

The specific configurations of harvest and the logging systems will be defined in the FLUP. Reconnaissance indicates most of the area is harvestable using shovel logging techniques. Several areas with steeper ground and isolated topography are more conducive to cable logging methods. The Division of Forestry will require full or partial suspension for any cable logging that occurs to manage soil disturbance, and ground-based mechanical yarding will

be suspended in times of saturated soil conditions if degradation of surface waters and standing water is likely to result.

4. Road Access - Design and Construction: Forest road design, construction, and maintenance will comply with the Forest Resources and Practices regulations (11 AAC 95.285-.355) and at a minimum meet the DOF Road Standards.

- a. Placement of Harvest Roads

The roads, both within the State Forest and on Settlement classified lands, are located with the management intent of minimizing the timber sale's overall road footprint, while accommodating the unique long-term needs of the respective land classification.

Within the State Forest, the roads will be used for long-term forest resource management, including future commercial timber harvest entries. The minimization of the road footprint supports the greatest allocation of ground area to silviculture and is a factor in managing reoccurring operational costs.

On Settlement classified land, the road has been placed to facilitate the near-term harvest of the timber, while also supporting long-term access objectives.

- b. Commercial Access

The log haul route for the sale will be limited to the 3000150 Road running north through the State Forest. Log hauling will not occur through the residential area of Thorne Bay or the codified watershed of the City of Thorne Bay.

Several segments of the 3000150 Road will require maintenance in order to reestablish operability. These improvements include brushing, vertical alignment adjustments to ease the adverse haul in several areas, ditch line re-establishment, surface additions, grading, and the possible replacement of the one log stringer bridge.

Except for the Bypass Road around the residential core of Thorne Bay (managed by the City of Thorne Bay), the anticipated haul route is managed by the USFS and the State. The Operator will be required by the timber sale contract to maintain the respective road systems proportionate to their use. Roads will receive regular and timely maintenance during operations. Residual condition of the roads will be like or better than conditions immediately prior to the sale. Expectations and responsibilities will be formally established prior to the start of road construction and timber harvest operations.

- c. Water Quality and Erosion Control

Stream 102-70-10720 is crossed at one location by a road. ADFG was consulted regarding the site. The crossing will be designed at minimum to the DOF Bridge Standards and an ADFG Fishway Permit will be acquired in the FLUP process. Although equipment will need to cross the stream during installation, the DOF anticipates no instream construction work. The design of the crossing will be further developed in the FLUP.

Numerous general water quality streams will be crossed by proposed roads within the sale area. To maintain water quality during road construction, the Division of Forestry

will implement FRPA's Best Management Practices (BMP). Due to the typically small drainage areas, the volume of surface runoff is projected to be manageable. The size and location of the drainage structures are specified in the FLUP process.

Soils in the area are generally thin, organic horizons with moderate to poor drainage. Organic soils have relatively low erosion potential. To keep the potential for soil erosion to a minimum, the amount of road construction has been minimized and the roads are generally not located on steep slopes. The roads are designed to follow the natural contours and benches as much as practical and are typically located on the more moderate slopes. Cable and shovel logging landings will be chosen to manage and minimize the concentration of water and movement of soil. To minimize the potential for erosion, FRPA road construction, maintenance, and slope stability standards will be adhered to at all times and included in timber sale contracts. The DOF timber sale administrator will ensure, with frequent field inspections, compliance with the timber sale contract.

d. Basic Road Design

Most of the road on this and other timber sales is built using a simple overlay style of construction. The road system, with a few exceptions on short spurs or on short mainline segments, is designed to achieve a constructed road with grades less than 12% and in most areas less than 8%. Some drilling and shooting will be required to remove rock obstructions and facilitate good drainage or to full-bench the road on short steeper sections of ground. In cases where road grades in the settlement classified lands are at 12%, the alignment was placed to develop as needed a lower grade in the future when the level of use warrants or other goals become important.

e. Post-harvest Road Maintenance

Following harvest operations, the DOF will consider leaving some of the Forest roads open for temporary public use, specifically firewood collection. This will be done where doing so will not compromise obligations to keep the road maintained for the preservation of soil and water quality. Short dead end spur roads will generally be closed after harvest or stand reestablishment to meet FRPA requirements and minimize unauthorized activities.

Most of the roads constructed in the sale are planned to be closed once reforestation has been established in the harvest units unless funds or agreements are made available to maintain the road for general access. Future state budget constraints may require a more aggressive road storage or closure plan.

This road management component may be modified by the land manager in the future as community needs are expressed. The land manager for the State Forest is the DOF. The land manager for the Settlement classified land is the DMLW.

F. Resources and management

1. Timber

a. Timber Stand Composition and Structure:

The proposed harvest area has the characteristics of mature old growth. The stand is dominated by a red cedar stand type. The timber identified is of mixed quality and generally notable in defect due to its slow growth and overall lower site class. The larger and better-quality timber in the area is generally located on the better drained soils. The stand is composed of western red cedar, western hemlock, Sitka spruce and occasional Alaska yellow cedar.

b. Stand Silvics:

Second growth forests adjacent and to the west and north of the proposed harvest area exhibit indications of productive site conditions and are between 15 and 50 years old. The stand to the west was pre-commercially thinned and has responded well. The sites identified in this BIF generally are residual stands that did not have the species composition for historical market conditions.

The DOF intends for reforestation to occur promptly and to encourage the growth of commercial timber species to a merchantable size in the shortest rotation length to support the objectives of the land management designation of the State Forest. The silvicultural prescription that best achieves these objectives is based on past experience and will entail clear-cut harvest. Unit size is primarily a product of topography and forest type, respecting other constraints such as soil stability, high-value fish and wildlife habitat and visual concerns. Clearing near habitable areas is also appropriate for removing large timber with its associated risks of hitting and disrupting infrastructure from windthrow near settlement.

Forests continually change. Timber stands in southeast Alaska in their natural state as well as in managed stands experience large natural disturbances primarily from wind action. Trees weakened from age, previous damage or that are subject to site stress (prevailing wind exposure, steep terrain, insect activity, etc.) tend to experience more damage than trees not having these issues. The DOF considers this natural turnover in the design of the unit, along with the regeneration capacity that the area indicates. The location and configuration of stand openings influences the resiliency of adjacent stands to windthrow as well. In many instances, a clear cut provides a higher likelihood of a robust future forest for commercial use than a partial cut, because of less breakage and turnover and the residual timber's effect of retarding ingrowth through shade. Partial harvest in Southeast Alaska tends to be used when site goals having to do with visual impact are more important than future timber values or risk from disturbance. The economics of development of infrastructure to support the removal of timber as well as safety concerns for workers contribute to the prevailing perspective

that partial cuts are not prudent, even though they may initially provide less shift in vegetation size and visual change. Working in residual timber is inherently more expensive because of the obstruction to movement and the added spatial dimension of hazards, not to mention the actions necessary to protect the residual stand.

Natural reforestation is anticipated to occur and DOF will verify that it meets FRPA standards. It is anticipated that some precommercial thinning will be done on the regenerating stand on the State Forest to shape the future production of merchantable products (typically saw logs) when it reaches the stem exclusion stage at approximately 30 years of age. On Settlement classified land, if significant blocks of the parcel are to remain unchanged in ownership during the next rotation age, precommercial thinning will likewise be considered.

- c. Reforestation and Site Preparation: The sale area will be reforested in compliance with the Forest Resources and Practices regulations (11 AAC 95.375-.390). The DOF will conduct post-harvest reforestation inspections of all areas of commercial timber harvest to ensure the stocking of natural regeneration meets or exceeds FRPA reforestation requirements.

Natural regeneration is the preferred regeneration method for this sale, and it is anticipated that adequate stocking levels will be achieved within five years after harvest. Experience with this regeneration method on POW has shown that well-stocked stands are readily established.

Sitka spruce is the preferred species in the projected market conditions. Spruce will likely be the favored and dominant species due to anticipated scarification in the units during harvesting operations and the clear cut openings providing direct sunlight that generally favors spruce regeneration. Scarification disturbs the vegetative mat and in turn provides a more receptive seed bed. Western hemlock and western red cedar will likely be major components of the regenerated stand as well (since they currently occupy the sites). Alaska yellow cedar represents less than five percent (total species composition) in the project area. It is predicted that Alaska yellow cedar will regenerate on sites it currently occupies, but at lower stocking levels due to vigorous regrowth of competing species (western red cedar, hemlock and spruce) as typically occurs when the lower volume/lower productivity growing sites are harvested or otherwise disturbed at the stand level.

- d. Topography and Soils:

The proposed sale will be designed and managed to prevent significant impairment of the land and water with respect to renewable resources (AS 41.17.060(c)(5)).

The timber sale occupies an area with broken topography ranging from moderate slopes to areas of short but steep rocky bluffs; aspect is generally a southeast exposure. Elevation ranges from 100 to 700 feet within the sale area. Most of the operable sale area has slopes of less than 45 percent. Rock appears shallow and soils are generally poorly drained. Soil characteristics range from well-drained glacial cobble

mix on decayed bedrock to an organic muskeg soil type. These soils undisturbed are relatively stable under 50% slopes.

Bedrock features are prominent in the areas with over 50% slopes with little soil; stability on these slopes is tied to the structural properties of the weathered rock and to a certain extent the overlying vegetative accumulation. While slope failure can occur due to harvest activity, it is more often a product of a natural mechanism. Best management practices focus loggers on maintaining the subsurface vegetation mat to provides macro and surface stability to soils.

Roads predominately have been placed on topography with benign features. While site-specific instability is possible, its probability, magnitude and severity compared to values at risk is low. There are few sustained slopes and generally thin soils on the project. While activity such as road construction can create a risk of soil movement or sedimentation, it is not likely when best management practices are used. The likelihood that soil movement could threaten other resources of concern is low.

2. Agriculture.

No agricultural use or grazing is known to occur within the area.

3. Wildlife habitat and harvest.

This sale has been designed following applicable planning guidelines based on statements of management intent for each of the types of land classification contained in the SESFMP, the POWIAP and the FRPA. The sale area was not identified as crucial habitat (Ha) or prime habitat (Hb) in the POWIAP or the SESFMP.

POW has a total area of approximately 2,577 square miles. The amount of land harvested by the Bay View timber sale is small in comparison to the size of POW (0.04%). Most of the land on POW is owned by the USFS with minor amounts in other private and public ownership.

The USFS has reserved productive old growth timber (POG) for non-timber values (such as wildlife) in the 2016 Tongass Land Management Plan. In all plan alternatives, less than a one percent of POG is projected to change in the next 100 years.

No specific areas of concern were identified by ADF&G in the comments received for the 2013-2017, 2015-2019 or 2018-2020 FYSTs or the preliminary BIF for the Thorne Bay #4 Timber Sale originally published in January of 2104.

The ADFG-DWC (Division of Wildlife Conservation) noted the existence of a wolf den in the area in Thorne Bay unit summary card in Chapter 3 of the SESFMP; during the scoping of this BIF, ADFG-DWC has indicated the referenced site is located on federal land to the east. Evidence of wolf activity was noted in several locations during DOF

field work on the project. The quantity of sign observed in the field was typical for a project of this size in SE Alaska and indicated some use by the wolves.

ADF&G-DWC Area Wildlife Biologist visited the sale area located on SESF land on September 27, 2016 with DOF. Initial conversations with ADF&G-DWC hypothesized that the site may have some value for deer habitat due to the site location relative to the extensive harvest area to the north and west that is now in regeneration status of varying ages. While this may be the case, it did not appear to hold the amounts of winter forbs and underbrush for it to make a high value wintering site. The deer activity observed was moderate and was typical for a medium- to low-volume stand dominated by red cedar. Use patterns observed are generally topography driven and are associated with timber types that had less cedar content. Stands with significant red cedar generally provided cover but less browse (food) potential. The timber sale area generally has stands composed of red cedar by volume at over 50%. Upon site inspection, the ADFG-DWC voiced no objection or recommendation relative to the use of the area for timber harvest or wildlife. The DOF will continue to involve the ADFG in the design of the timber sale as individual timber harvest units are developed in the FLUP stage.

The resulting change in availability of deer for wolf predation on POW is projected to be minor. A reduction in deer habitat in the immediate area will result because of the harvest of this timber. Deer numbers will remain approximately the same as the stand regenerates, but will diminish as the understory is shaded out during mid-term regeneration at approximately 30 years of age. Consequently, the act of the harvest of timber will eventually lower the capacity of the immediate area to provide for deer habitat values during the period of 30 to 65 years, at which point the understory will gradually provide more long-term food capacity, and the overstory will provide more snow interception and thermal cover.

The USFS and the State have both thinned timber stands located to the north, which can aid in the establishment and growth of browse in nearby areas to increase deer habitat conditions and values. It is also likely that some of the area to the north and west will be harvested at about the same time as the stem exclusion phase is reached in this proposed sale area; this in turn could provide an increasing source of browse at the same time browse availability is projected to decrease in this sale area. This in combination with clearing for settlement activities will provide a similar result.

While designing timber harvest units, the DOF documented several trees with larger cavities that appear to have been used for black bear dens. These dens were typically close to the edge of proposed units.

Hunting and trapping occur in the area. The project area currently receives limited use away from the existing road system or saltwater for hunting. A significant area to the east and north is accessible by boat for purposes of remote hunting and is mainly on USFS land. Once the area is accessed by road, hunting is expected to increase. The eventual reduction in deer population may be most noticeable for humans as the area regenerates to a second growth forest, thus again diminishing human wheeled access and visibility of the deer.

It is likely that human interaction with wildlife may occur due to the area's proximity to the community of Thorne Bay and the waterfront-based subdivisions on Thorne Bay. The spur roads associated with the timber harvest will provide some additional access for human activities associated with wildlife. Other communities on POW have generally discouraged hunting or shooting on lands bordering residential subdivisions for safety reasons. Regardless, added hunting pressure is not anticipated to be significant due to the proximity of a much larger road network elsewhere on POW. Another mitigating factor will be the intent of the DOF under the FRPA to close roads at the end of harvest if funds are not available for maintenance or they present risks to the landowner.

The DOF used available federal information on cataloged bald eagle nest locations and field observations during design to locate and avoid nest sites. No additional nests were observed or documented in the process of designing the timber sale. All nests were given at least a 330-foot retention area of undisturbed timber.

There will be no harvest within 100 feet on either side of anadromous water body 102-70-10720 per the FRPA. Harvest within 100 to 300 feet of these water bodies has been evaluated and left where terrain lends itself to the maintenance of important fish and wildlife habitat and contributes to the overall wind firmness of the mandatory timber retention area. These retention areas also function as wildlife movement corridors. These retention areas are generally in excess of 200 feet total width adjacent to the harvest units.

The sale is not expected to cause significant adverse impacts overall to the wildlife populations on POW based on the area planning information and the site-specific observations of its characteristics.

Under the FRPA, the DOF has and will provide due deference to ADFG for designing the retention of timber and modifying harvest activity during operations for the management of important wildlife species. In the case of this particular sale, this has taken the form of:

1. Modifying the harvest units in the bear denning areas to leave the trees and adjacent timber to encourage continuity of use,
2. Retaining timber for travel cover and anadromous habitat along cataloged streams as prudent relative to observed wildlife use, the terrain features and timber values,
3. Agreeing to implement activity guidelines associated with commercial harvest activity within one half mile of the known wolf den site when active denning is confirmed by ADFG to exist between March 15 and July 15. The goal of the activity guideline is to reduce noise that may disturb and push wolves out of their den. While this does not preclude all harvest activity, it restricts the timing of loud activity such as blasting, helicopter logging and road construction within one half mile of the den.
4. Fish Habitat, Water Resources, and Water Quality. The proposed sale has been designed and managed to protect fish habitat and water quality in compliance with the Forest Resources and Practices Act and regulations (AS 41.17 and 11 AAC 95). As required by AS 41.17.098, DOF provided due deference to ADF&G to ensure all fish and wildlife

habitat issues are addressed by the proposed timber sale design. DOF provides due deference to the Alaska Department of Environmental Conservation (ADEC) for all water quality issues. The ADF&G-Habitat Biologist was familiar with the area and visited the streams during planning.

Two small cataloged anadromous streams (102-70-10720 and 10710) are located within the sale area. These streams have received retention areas of approximately 200 feet either side. The topography along much of the coastal area is generally too steep for fish bearing waters. No other anadromous streams were observed during layout of the sale.

Several tributaries to the above anadromous streams were evaluated by ADFG for contributing to anadromous habitat. One stream had habitat potential; it did not contain evidence of anadromous fish although it did have resident Dolly Varden char and cutthroat trout. Regardless, the stream will receive a retention area of 100 feet due to connectivity with the cataloged stream and a request by ADFG to do so.

Due to the location and design of the units and roads, and the topography around significant surface water bodies, the timber sale avoids significant adverse impacts to water quality. The FRPA will be implemented to maintain bank and soil stability and water quality along all streams. It is standard practice on State timber sales to protect water quality of non-fish bearing water bodies through a combination of retention areas, directional felling, partial suspension of logs, split-yarding, and removal of incidental logging debris (limbs, tops, etc.) from stream channels as required. The varied gradient of the streams of the sale area also aids in the control and settlement of incidental turbidity generated by the operations (e.g., from culvert installation and removal).

The topography distributes runoff from the sale to numerous drainages that radiate from the sale. It is anticipated that some change will occur in the surface drainages as the result of harvest for the first 20 to 30 years. Intensity and quantity of flow will be different until the units green up and are established. The anticipated temporary flow changes attributable to the harvest area is not concentrated to a level in the drainages that will significantly influence or risk downstream resources.

5. Recreation, Tourism, and Scenic Resources.

Recreation in this part of southeast Alaska is generally of a dispersed and remote nature. Past timber sales have provided road access for dispersed recreational opportunities and this timber sale will provide similar access. This timber sale is expected to result in no changes to recreational or tourism use of the area.

Road access may provide diversity of hunting access, but relative to the overall availability of similar roaded areas on POW, it will be minor. ATV traffic will not be actively managed. Typically, unless cleared of alder by incidental users, the roadbeds will not be drivable by ATVs within approximately fifteen years following completion of timber sale closeout operations.

Commercial fishing lodges in an established subdivision are located to the south of the sale area on the opposite shoreline. These lodges have a direct view of the bulk of the waterfront but not all of the settlement classified land. Due to topography, retained timber and the location of the timber sale, only small portions of the timber sale will be visible from the waters of Thorne Bay. This mixture of vegetation types on the landscape is like adjacent viewsheds in the bay. It is expected that over time some the settlement area adjacent to the shore will see development associated with lot development like the southern shoreline.

Based on community stakeholder input, the DNR has chosen to retain the timber portrayed in the PBIF directly adjacent to the community center. The unharvested area maintains the existing visual character as viewed from ground level in north Thorne Bay. These retained areas will obscure the harvest activity. Comments indicated that this was a relatively important value to the community associated with current and potential commercial tourism. Hiding the timber sale from aircraft was not a reasonable constraint, relative to the project's objectives.

Retention of all timber was not compatible with the objective to provide proximate access to the land suited for settlement near the bay. The area to the east of town proximate to the bay proposed for harvest will be obscured by topography and unharvested shoreside vegetation that ranges in width from 200 to 1,600 feet. While the harvest will be visible at several points from the bay, it is designed to not dominate the landscape.

6. Cultural Resources.

The DOF and the Land Development Section works with the State Historic Preservation Office (SHPO) to identify and avoid known cultural, historic or prehistoric sites in planning the proposed access routes, harvest areas and subdivision development. Research indicated several sites on the coast associated with historic use during scoping for the area. The SHPO conducted several site surveys of the area and made recommendations for retaining and buffering these areas in an undisturbed state. The DNR has planned future activities with those constraints.

If additional archaeological sites are identified, proposed activity and road locations will be appropriately adjusted to avoid conflicts. If any historic or archaeological sites are encountered during road construction or harvest activities, the DOF will immediately inform SHPO and take action to protect and document the findings.

7. Subsurface Resources.

There is no known current mining activity in the immediate area. Other than sharing some of the same access roads, this sale should have no impact on the potential mining resources or mining activity in this area.

G. Costs and benefits

The DOF will appraise the timber value in compliance with 11 AAC 71.092.

The sale area will be appraised by using a residual value appraisal method. Selling values and extraction cost data are obtained from industry sources, the United States Forest Service, and previous operations.

Based on DOF observations of the project area and historic markets, timber revenue is projected to cover administration, access and operating costs for this sale area and provide stumpage royalty to the State. Making the timber available on State Forest land is in keeping with the constitution and the intent of the governor and legislature to make the resource available in a sustainable manner commensurate with demand. Making the timber available on the Settlement classified land similarly responds to the market demand in a temporal manner.

Access will be improved on State Forest land for timber management which increases the long term operational flexibility of the forest to meet its purpose. On Settlement lands, terrestrial access will be proximate to likely future residential development and coastal areas identified by stakeholders as having value to the community for expansion and recreational use.

During the planning process, DOF staff was questioned about the appropriateness of constructing a logging road and then using it for access to settlement classified lands. Discussions made comparisons to previous roads in the area that generally supported timber harvest. It was pointed out that these roads often were too steep, narrow, contained tighter geometric alignments and had suspect or deficient foundations to be improved upon. While these criticisms may be applicable situationally, they overlook the utility of the logging road for providing basic access to areas. Logging roads in general have pioneered much of SE Alaska. Forest roads have provided many people initial access to land and secondary projects. They are scalable and regularly used in a similar format to build more refined roads. They are appropriate for the timber harvest given the lack of certainty of the future development. The forest roads will be constructed to the DOF standards that account for the foreseeable uses. Constructing to a higher or more refined standard over the entire project area is not a practical request. The DOF has worked with the Land Development Section to place a constructible alignment that could be feasibly constructed to applicable American Association of State Highway and Transportation Officials Guidelines for Very Low Volume Roads in the future. To construct a higher order road in all parts of the settlement area at this time is not needed to remove the timber. It is an unrealistic expectation given the uncertainty of timing of the future development because of a variety of factors and may not be a reasonable expenditure of the funds relative to the other needs of the state.

The timber removal from settlement areas can be an economic hurdle to land and right of way development and is typically an obstacle to utility installation. Mobilization and capitalization costs are typically a barrier unless done at scale. To protect the State's interest, its disposal policy restricts the removal of resources (timber or rock) until the State has been paid in full by a purchaser; this policy in practice limits lot development to those with significant

working capital. While some lot developers have the capability to economically handle the work, it is inherently a constraint. Removing it in a planned manner and in bulk creates scale to effectively manage and market timber to the benefit the parties involved and set the stage for smaller purchasers to occupy and develop the lots at the time of purchase.

One management goal for the timber sale is to encourage as much of the timber as is economically feasible to be locally processed in Southeast Alaska. While scoping this decision in the community of Thorne Bay, several commenters thought it appropriate that small mill operators located in the Thorne Bay vicinity be provided the priority and opportunity to benefit from some or all of the timber. Partitioning the timber into smaller blocks and over a longer period was suggested by several operators. The use of a competitive process was also suggested due to interest in the timber.

The DOF has sold significant amounts of timber in the Thorne Bay area to smaller mills located in Goose Creek and to the larger mill owned by Viking Lumber Company in Klawock. The DOF will continue a similar approach in SE to the extent that timber sale project economics and budgetary conditions make it prudent. Based on past performance, the DOF projects that it will need a larger sale format covering most of the proposed area to attract the capital to meet the goal of timely overall project access.

Portions of the project area have been initially identified that would likely suit the capital resources and capabilities of smaller timber purchasers. The DOF currently has identified two areas on this project that will be used for smaller sale development under AS 38.05.115 (see Appendix A). The DOF will use its Request for Proposal Process (RFP) for these sales.

Viking Lumber Company has requested timber at the scale presented that is currently lacking with any certainty elsewhere from public lands in Southeast Alaska. A sale of this size is achievable and appropriate given the State's resources. This sale provides the potential for significant jobs during a time of great economic anxiety. Providing the timber at this scale also provides alternate and extended options for marketing other wood procured by smaller operators, and contributes to maintaining the resident skill sets and contractor capacity (from within and out of state) to handle timber in the region, regardless of scale. Due the general competitive interest on POW, the DOF will use the RFP process for the large sale as well.

While towns in Southeast Alaska may postulate that they could benefit to a greater extent from the harvest of timber within their sphere of influence, timber sales have traditionally created significant economic benefits to the broader community of Southeast Alaska. Due to the dynamic nature of this country and the timber business, one community cannot expect to solely benefit from a State-owned public resource, nor can the State mandate methods and means in specific detail and expect a healthy resilient enterprise to exist. The business communities on the island will likely receive significant and direct economic benefits by providing support services for the operators such as fuel, food, housing, medical and other miscellaneous supplies.

The residents of the communities in Southeast Alaska could receive a direct benefit through employment opportunities and wages paid by the operator during the timber harvest and milling operations. The number of jobs in Thorne Bay relative to this sale, like the opportunity to

the local businesses, is shaped by many factors beyond the control of the State. An underlying tone conveyed in scoping conversations revealed a sense that timber was not as significant of a driver in the community as it has been, and further that a significant number of residents now derive or are projected to derive their incomes from seasonal tourism. Some level of anxiety surfaced in comment that the harvest would negatively impact the visual marketability of the area. Southeast Alaska has experienced great change over the last two decades as the timber industry has declined and it has developed its tourism. The DNR took this as a valid concern, but observation does not clearly support the assertion that clear-cuts categorically will trigger change in the use of the area given the prevalent existence of that type of viewshed on the island already. Notwithstanding, the DOF has modified the sale footprint to reflect the historic visual value inherent to the city center. The idea that the sale should not be visible from the air was deemed to not be practical in keeping with the objectives of the project. A key measure to note is that DOF has moved the proposed harvest line east well past the break on the hillside and will focus on the wind stability of the retained timber as it places the unit boundary. This will be done to the extent feasible, keeping in mind the scope of needed future access. The approach maintains the backdrop that provides and supports a similar view from ground level in the community and to the lodges on the south shore. Some of the harvest will be visible from the south shore and is in keeping with the goal of accessing key pieces of the terrain for future use. While the proposed timber sale will not harvest near the shore, some development in the area is likely to occur in the future, similar to the south shore on Thorne Bay. DNR has sought to strike a balance while providing the means to access State land and generate revenue in both land and the timber per the POWIAP.

VI. PUBLIC NOTICE

The DOF presented the project and answered questions at a work session prior to the regular meeting of the City of Thorne Bay Council on July 16, 2019. The preliminary best interest finding, and decision was publicly noticed in compliance with AS 38.05.945. Notice was posted on the Alaska Online Public Notice System on July 27, 2019. Notices were also posted at the Ketchikan, Craig and Thorne Bay Public Libraries. Mailed notices were distributed to a mailing list maintained by the Southeast Area Office and public notices were sent to the post offices of Ketchikan, Ward Cove, Craig, Klawock, Thorne Bay, Coffman Cove, Naukati, Metlakatla, Wrangell and Petersburg. A legal notice is also provided in the Ketchikan Daily News on July 27 and August 3, 2019; the Island Post on August 7 and 21, 2019; and the Petersburg and Wrangell papers on August 1 and 8, 2019. The DOF conducted an informational meeting on February 11, 2020 in the City of Thorne Bay Council chambers that was attended by approximately 30 people; the status of the project and summary of issues with a possible timber sale configuration was reviewed by DOF and general information on state land sales was discussed by the DNR Land Development Section.

VII. PUBLIC COMMENT

DOF received comments on the preliminary best interest finding noticed in 2019 for this proposed timber sale from State agencies, the City of Thorne Bay, and two individuals in a timely manner; the DOF also received two comments after the notified deadline for comment. See Appendix D for a table of the issues raised during on time comment and DOF's responses. The late comments and comment tributary to the February 11, 2020 meeting are summarized in Appendix D1.

VIII. RECOMMENDATION AND PRELIMINARY DECISION

After due consideration of all pertinent information, the ADNDR has reached the following decision: to offer for sale approximately 587 acres of old growth forest composed of western hemlock, Sitka spruce, western red cedar and Alaska yellow cedar from State Forest land and Settlement classified land on Prince of Wales Island. Harvest activities on the State Forest lands will follow the management intent of the Southeast State Forest Land Management Plan. Activities on Settlement land will follow the management intent of the Prince of Wales Island Area Plan. The DOF finds that this decision satisfies the objectives stated in this document and it is in the best interest of the State to proceed with this action under its authority in AS 38.05.035(e) (Powers and Duties of the Director) and AS 38.05.110-120; 11 AAC 71 (Timber Sale Statutes and Regulations; and AS 41.17.010-.950 and 11 AAC 95 (Forest Resources and Practices Statutes and Regulations).

IX. SIGNATURE



May 7, 2020

Corri Feige
Commissioner
Alaska Department of Natural Resources

X. REQUESTS FOR RECONSIDERATION

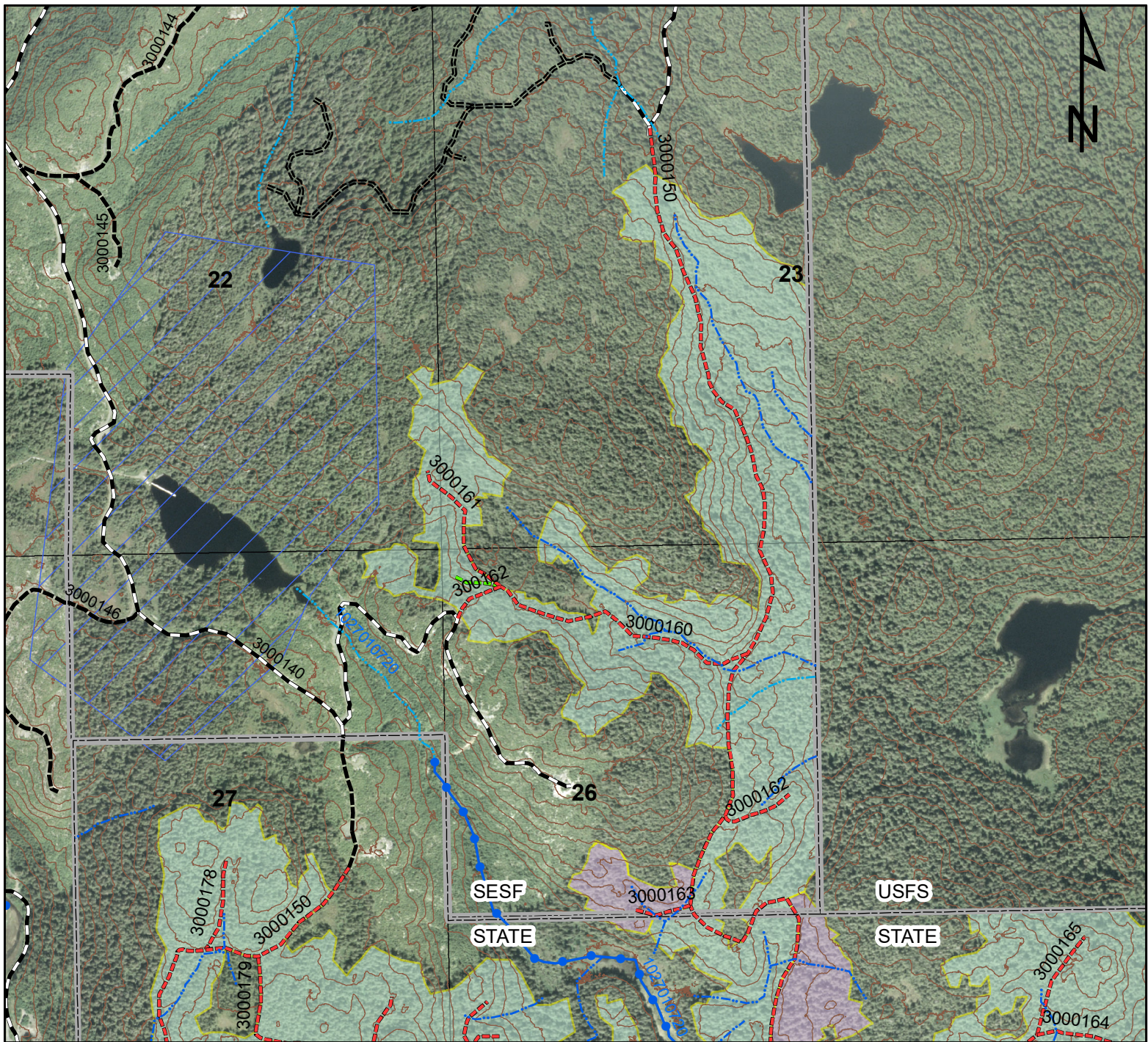
A person who has standing under Alaska law may request reconsideration in accordance with 11 AAC 02. Any reconsideration request must be received within twenty (20) days of issuance of this decision. The request may be mailed or delivered to Corri Feige, Commissioner, Department of Natural Resources, 550 W. 7th Avenue, Suite 1400, Anchorage, Alaska 99501; faxed to 1-907-269-8918, or sent by electronic mail to dnr.appeals@alaska.gov. A copy of 11 AAC 02 is provided in Appendix C.

If you have any questions, please contact: Greg Staunton at (907) 225-3070 or email greg.staunton@alaska.gov.

XI. APPENDICES

Appendix A	SSE-1369-K Bay View Timber Sale Area Maps (3 pages)
Appendix B	References
Appendix C	Appeal Regulations
Appendix D/D1	Bay View Timber Sale Comments & Responses

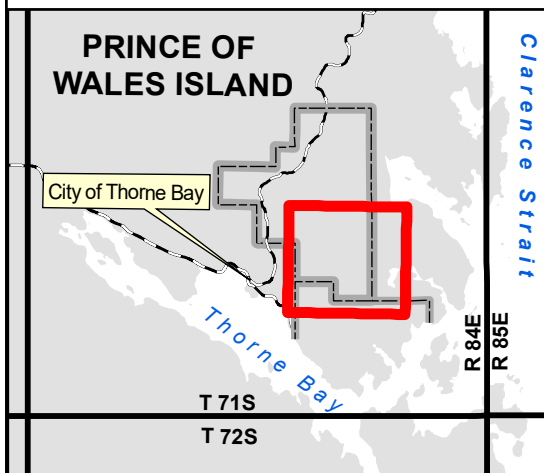
Appendix A SSE-1369-K Bay View Timber Sale Area Maps



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1 inch = 1,000 feet

T71S, R84E
Sections 22, 23, 26, 27, 34,
and 35 CRM

Contour Interval = 40 feet
Source: 2018 USFS LiDAR



Vicinity Map 1 in = 3 miles



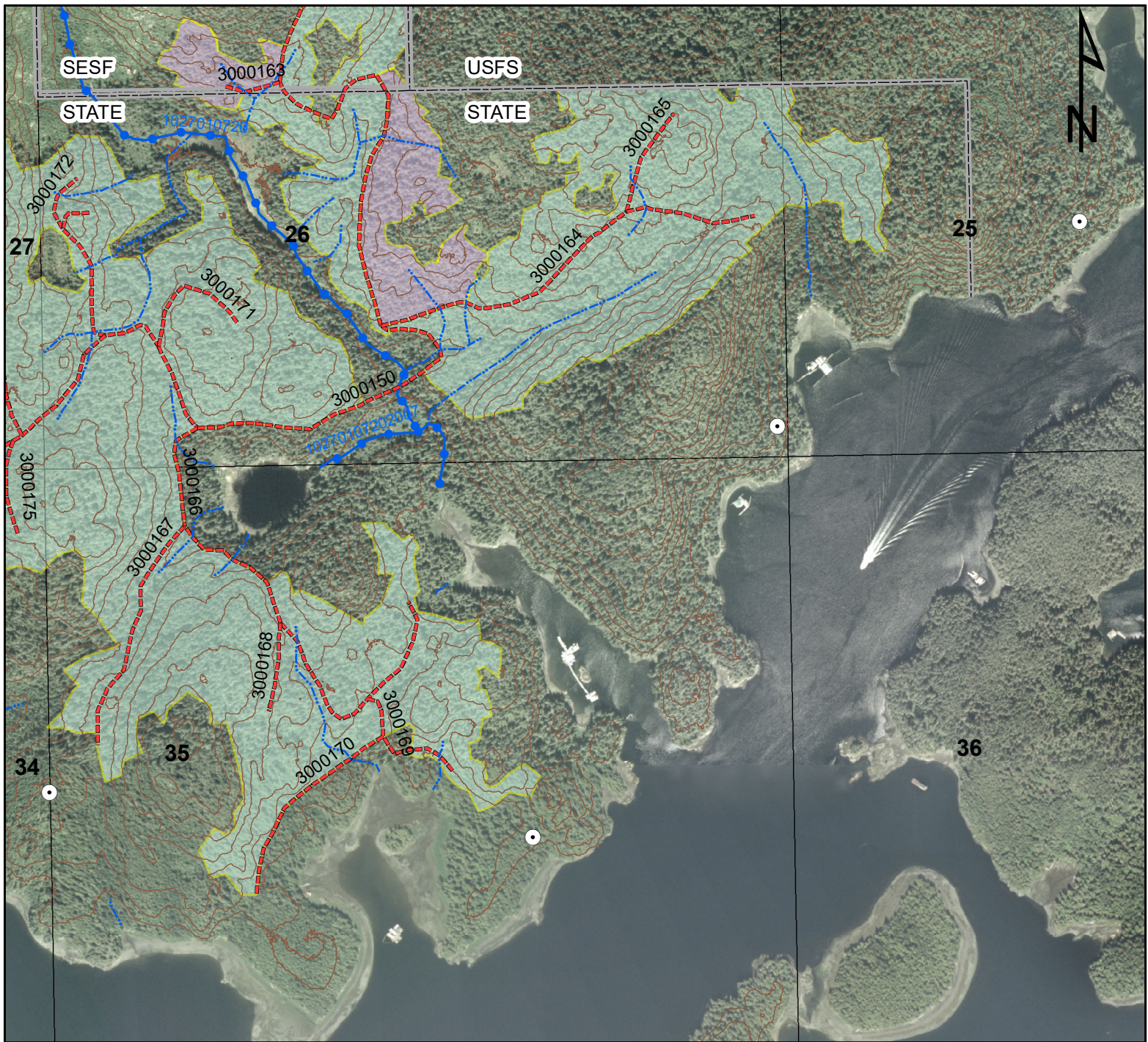
APPENDIX A **SSE-1369K** **BAY VIEW** **TIMBER SALE MAP** **PAGE 1**



DIVISION OF FORESTRY

Date: 4/9/2020

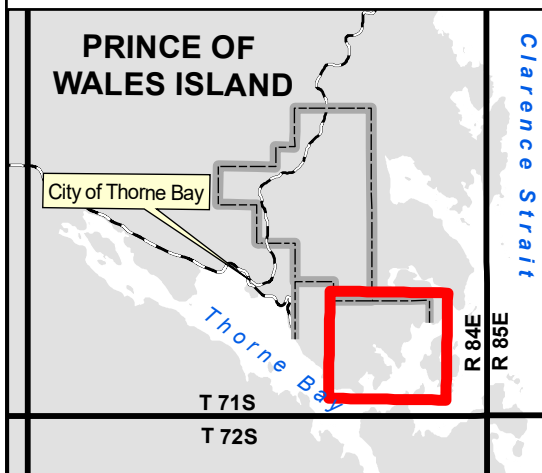
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T71S, R84E
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Contour Interval = 40 feet
Source: 2018 USFS LiDAR



Vicinity Map 1 in = 3 miles



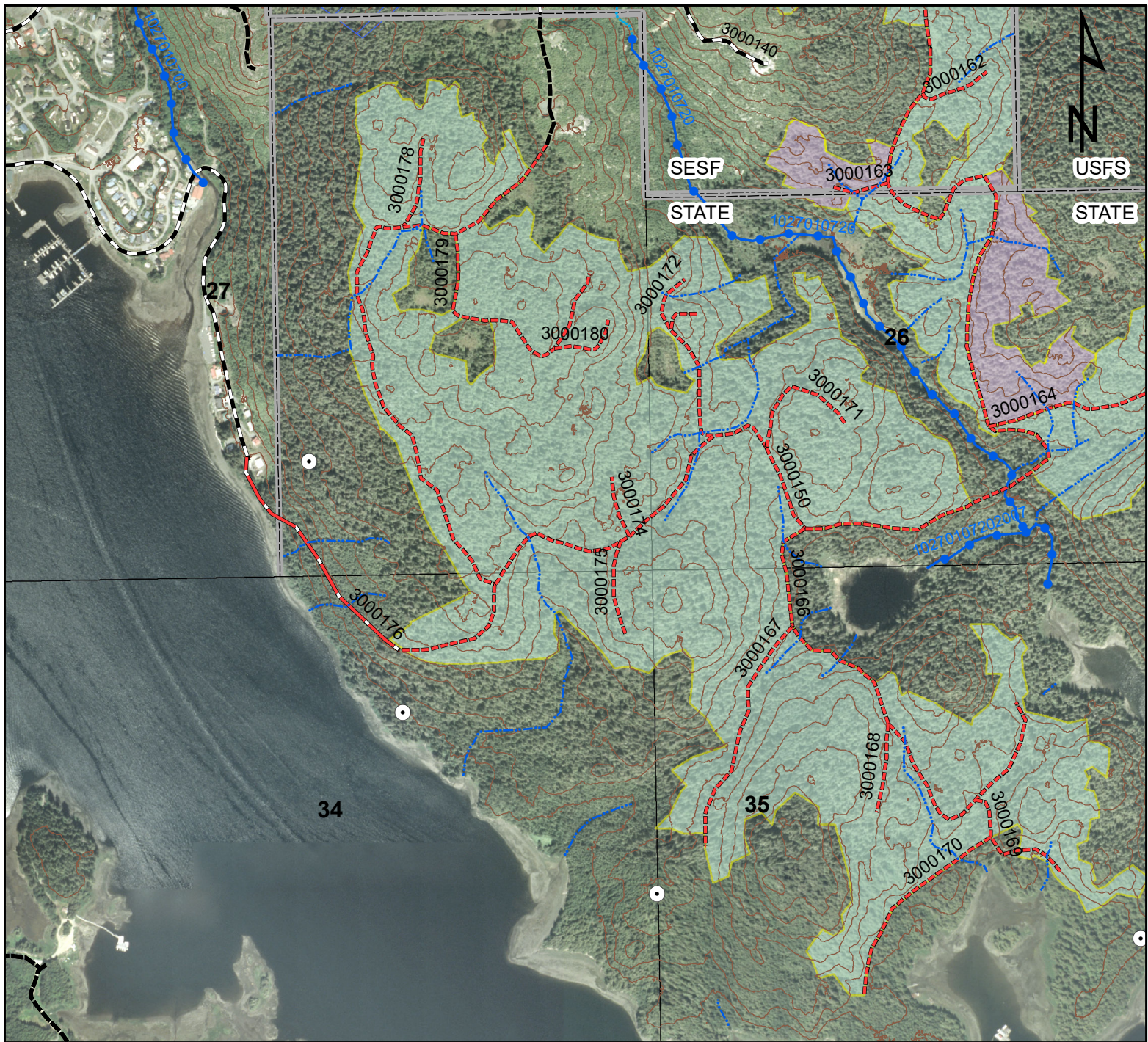
APPENDIX A SSE-1369K BAY VIEW TIMBER SALE MAP PAGE 2



DIVISION OF FORESTRY

Date: 4/9/2020

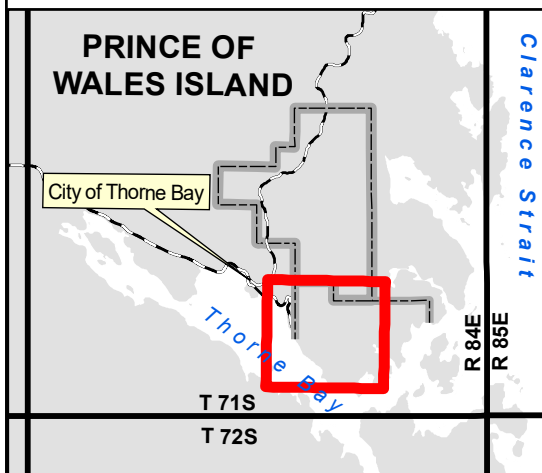
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1 inch = 1,000 feet

T71S, R84E
Sections 22, 23, 26, 27, 34,
and 35 CRM

Contour Interval = 40 feet
Source: 2018 USFS LiDAR



Vicinity Map 1 in = 3 miles



APPENDIX A SSE-1369K BAY VIEW TIMBER SALE MAP PAGE 3



DIVISION OF FORESTRY

Date: 4/9/2020

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Appendix C Appeal and Request for Reconsideration Regulations

Note: "Appeal" means a request to the commissioner to review a decision that the commissioner did not sign or cosign. "Request for reconsideration" means a petition or request to the commissioner to review an original decision that the commissioner signed or cosigned.

Title 11.02 Appeals

TITLE 11. NATURAL RESOURCES.

CHAPTER 02. APPEALS.

Section

Section

10. Applicability and eligibility

50. Hearings

15. Combined decisions

60. Stays; exceptions

20. Finality of a decision for purposes of appeal to court

70. Waiver of procedural violations

30. Filing an appeal or request for reconsideration

80. (Repealed)

40. Timely filing; issuance of decision

900. Definitions

11 AAC 02.010. APPLICABILITY AND ELIGIBILITY. (a) This chapter sets out the administrative review procedure available to a person affected by a decision of the department. If a statute or a provision of this title prescribes a different procedure with respect to a particular decision, that procedure must be followed when it conflicts with this chapter.

(b) Unless a statute does not permit an appeal, an applicant is eligible to appeal or request reconsideration of the department's decision on the application. An applicant is eligible to participate in any appeal or request for reconsideration filed by any other eligible party.

(c) If a statute restricts eligibility to appeal or request reconsideration of a decision to those who have provided timely written comment or public hearing testimony on the decision, the department will give notice of that eligibility restriction as part of its public notice announcing the opportunity to comment.

(d) If the department gives public notice and allows a public comment period of at least 30 days on a proposed action, and if no statute requires opportunity for public comment, the department may restrict eligibility to appeal or request reconsideration to those who have provided timely written comment or public hearing testimony on the proposed action by including notice of the restriction as part of its public notice announcing the opportunity to comment.

(e) An eligible person affected by a decision of the department that the commissioner did not sign or cosign may appeal the decision to the commissioner within the period set by 11 AAC 02.040.

(f) An eligible person affected by a decision of the department that the commissioner signed or cosigned may request the commissioner's reconsideration within the period set by 11 AAC 02.040.

(g) A person may not both appeal and request reconsideration of a decision. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:	AS 03.05.010	AS 38.04.900	AS 38.08.110	AS 41.15.020	AS 44.37.011
	AS 29.65.050	AS 38.05.020	AS 38.09.110	AS 41.17.055	AS 46.15.020
	AS 29.65.120	AS 38.05.035	AS 38.50.160	AS 41.21.020	AS 46.17.030

11 AAC 02.015. COMBINED DECISIONS. (a) When the department issues a combined decision that is both a final disposal decision under AS 38.05.035(e) and any other decision, including a disposal decision combined with a land use plan decision, or a disposal decision to grant certain applications combined with a decision to deny others, the appeal process set out for a disposal decision in AS 38.05.035(i) - (m) and this chapter applies to the combined decision.

(b) A decision of the department may include a statement that a final consistency determination under AS 46.40 (Alaska Coastal Management Program) has been rendered in conjunction with the decision. A person may not, under this chapter, appeal or request reconsideration of the final consistency determination, including a requirement necessary solely to ensure the activity is consistent with the Alaska coastal management program as approved under AS 46.40. (Eff. 9/19/2001, Register 159)

Authority:	AS 29.65.050	AS 38.04.900	AS 38.05.035	AS 38.09.110
	AS 29.65.120	AS 38.05.020	AS 38.08.110	AS 38.50.160

11 AAC 02.020. FINALITY OF A DECISION FOR PURPOSES OF APPEAL TO COURT. (a) Unless otherwise provided in a statute or a provision of this title, an eligible person must first either appeal or request reconsideration of a decision in accordance with this chapter before appealing a decision to superior court.

(b) The commissioner's decision on appeal is the final administrative order and decision of the department for purposes of appeal to the superior court.

(c) The commissioner may order or deny a request for reconsideration within 30 calendar days after issuance of the decision, as determined under 11 AAC 02.040(c)-(e). If the commissioner takes no action during the 30-day period, the request for reconsideration is considered denied. Denial of a request for reconsideration is the final administrative order and decision of the department for purposes of appeal to the superior court.

(d) If the commissioner timely orders reconsideration of the decision, the commissioner may affirm the decision, issue a new or modified decision, or remand the matter to the director for further proceedings. The commissioner's decision, other than a remand decision, is the final administrative order and decision of the department for purposes of appeal to the superior court. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:	AS 03.05.010	AS 38.04.900	AS 38.08.110	AS 41.15.020	AS 44.37.011
	AS 29.65.050	AS 38.05.020	AS 38.09.110	AS 41.17.055	AS 46.15.020
	AS 29.65.120	AS 38.05.035	AS 38.50.160	AS 41.21.020	AS 46.17.030

11 AAC 02.030. FILING AN APPEAL OR REQUEST FOR RECONSIDERATION. (a) An appeal or request for reconsideration under this chapter must

(1) be in writing;

(2) be filed by personal service, mail, fax, or electronic mail;

(3) be signed by the appellant or the appellant's attorney, unless filed by electronic mail; an appeal or request for reconsideration filed by electronic mail must state the name of the person appealing or requesting reconsideration and a single point of contact to which any notice or decision concerning the appeal or request for reconsideration is to be sent;

(4) be correctly addressed;

(5) be timely filed in accordance with 11 AAC 02.040;

- (6) specify the case reference number used by the department, if any;
- (7) specify the decision being appealed or for which reconsideration is being requested;
- (8) specify the basis upon which the decision is challenged;
- (9) specify any material facts disputed by the appellant;
- (10) specify the remedy requested by the appellant;

(11) state the address to which any notice or decision concerning the appeal or request for reconsideration is to be mailed; an appellant may also provide a telephone number where the appellant can be reached during the day or an electronic mail address; an appeal or request for reconsideration filed electronically must state a single address to which any notice or decision concerning the appeal or request for reconsideration is to be mailed;

(12) identify any other affected agreement, contract, lease, permit, or application by case reference number, if any;

(13) include a request for an oral hearing, if desired; in the appeal or request for reconsideration, the appellant may include a request for any special procedures to be used at the hearing; the appeal or request for reconsideration must describe the factual issues to be considered at the hearing, and

(14) be accompanied by the applicable fee set out in 11AAC 05.160. (Eff 11/7/90, Register 116; am 9/19/2001, Register 159; am 7/01/2018, Register 227).

(b) At the time an appeal is filed, and up until the deadline set out in 11 AAC 02.040(a) to file the appeal, an appellant may submit additional written material in support of the appeal, including evidence or legal argument.

(c) If public notice announcing a comment period of at least 30 days was given before the decision, an appellant may not submit additional written material after the deadline for filing the appeal, unless the appeal meets the requirement of (a) of this section and includes a request for an extension of time, and the department determines that the appellant has shown good cause for an extension. In considering whether the appellant has shown good cause, the department will consider factors including one or more of the following:

- (1) comments already received from the appellant and others;
- (2) whether the additional material is likely to affect the outcome of the appeal;
- (3) whether the additional material could reasonably have been submitted without an extension;
- (4) the length of the extension requested;
- (5) the potential effect of delay if an extension is granted.

(d) If public notice announcing a comment period of at least 30 days was not given before the decision, an appellant may submit additional written material after the deadline for filing the appeal, if the appeal meets the requirements of (a) of this section and includes a notice of intent to file the additional written material. The department must receive the additional written material within 20 days after the deadline for filing the appeal, unless the appeal also includes a request for an extension of time, and the department determines that the appellant has shown good cause for an extension. In considering whether the appellant has shown good cause, the department will consider factors including one or more of the following:

- (1) comments already received from the appellant and others;

- (2) whether the additional material is likely to affect the outcome of the appeal;
- (3) whether the additional material could reasonably have been submitted without an extension;
- (4) the length of the extension requested;
- (5) the potential effect of delay if an extension is granted.

(e) At the time a request for reconsideration is filed, and up until the deadline to file a request for reconsideration, an appellant may submit additional written material in support of the request for reconsideration, including evidence or legal argument. No additional written material may be submitted after the deadline for filing the request for reconsideration.

(f) If the decision is one described in 11 AAC 02.060(c), an appellant who believes a stay of the decision is justified may ask for a stay as part of the appeal or request for reconsideration. The appellant must include an argument as to why the public interest requires a stay. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:	AS 03.05.010	AS 38.04.900	AS 38.08.110	AS 41.15.020	AS 44.37.011
	AS 29.65.050	AS 38.05.020	AS 38.09.110	AS 41.17.055	AS 46.15.020
	AS 29.65.120	AS 38.05.035	AS 38.50.160	AS 41.21.020	AS 46.17.030
	AS 37.10.050				

Editor's note: The address for an appeal or request for reconsideration by personal service and by mail is: Department of Natural Resources, Commissioner's Office, 550 W. 7th Avenue, Suite 1400, Anchorage, Alaska 99501-3561. The number for an appeal or request for reconsideration by fax is: 1-907-269-8918. The electronic mailing address for an appeal or request for reconsideration by electronic mail is: dnr_appeals@dnr.state.ak.us

11 AAC 02.040. TIMELY FILING; ISSUANCE OF DECISION. (a) To be timely filed, an appeal or request for reconsideration must be received by the commissioner's office within 20 calendar days after issuance of the decision, as determined under (c) or (d) of this section, unless another period is set by statute, regulation, or existing contract. If the 20th day falls on a day when the department is officially closed, the appeal or request for reconsideration must be filed by the next working day.

(b) An appeal or request for reconsideration will not be accepted if it is not timely filed.

(c) If the appellant is a person to whom the department delivers a decision by personal service or by certified mail, return receipt requested, issuance occurs when the addressee or the addressee's agent signs for the decision. If the addressee or the addressee's agent neglects or refuses to sign for the certified mail, or if the address that the addressee provided to the department is not correct, issuance by certified mail occurs when the decision is deposited in a United States general or branch post office, enclosed in a postage-paid wrapper or envelope, addressed to the person's current address of record with the department, or to the address specified by the appellant under 11 AAC 02.030(a)(11).

(d) If the appellant is a person to whom the department did not deliver a decision by personal service or certified mail, issuance occurs

(1) when the department gives public notice of the decision; or

(2) if no public notice is given, when the decision is signed; however, the department may state in the decision a later date of issuance and the corresponding due date for any appeal or request for reconsideration.

(e) The date of issuance constitutes delivery or mailing for purposes of a reconsideration request under AS 44.37.011(d) or AS 44.62.540(a). (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:	AS 03.05.010	AS 38.04.900	AS 38.08.110	AS 41.15.020	AS 44.37.011
	AS 29.65.050	AS 38.05.020	AS 38.09.110	AS 41.17.055	AS 46.15.020
	AS 29.65.120	AS 38.05.035	AS 38.50.160	AS 41.21.020	AS 46.17.030

11 AAC 02.050. HEARINGS. (a) The department will, in its discretion, hold a hearing when questions of fact must be resolved.

(b) The hearing procedure will be determined by the department on a case-by-case basis. As provided in 11 AAC 02.030(a)(13), any request for special procedures must be included with the request for a hearing.

(c) In a hearing held under this section

(1) formal rules of evidence need not apply; and

(2) the hearing will be recorded, and may be transcribed at the request and expense of the party requesting the transcript. (Eff. 11/7/90, Register 116)

Authority:	AS 03.05.010	AS 38.04.900	AS 38.09.110	AS 41.17.055	AS 46.17.030
	AS 29.65.050	AS 38.05.020	AS 38.50.160	AS 41.21.020	
	AS 29.65.120	AS 38.08.110	AS 41.15.020	AS 46.15.020	

11 AAC 02.060. STAYS; EXCEPTIONS. (a) Except as provided in (c) and (d) of this section, timely appealing or requesting reconsideration of a decision in accordance with this chapter stays the decision during the commissioner's consideration of the appeal or request for reconsideration. If the commissioner determines that the public interest requires removal of the stay, the commissioner will remove the stay and allow all or part of the decision to take effect on the date set in the decision or a date set by the commissioner.

(b) Repealed 9/19/2001.

(c) Unless otherwise provided, in a statute or a provision of this title, a decision takes effect immediately if it is a decision to

(1) issue a permit, that is revocable at will;

(2) approve surface operations for a disposal that has already occurred or a property right that has already vested; or

(3) administer an issued oil and gas lease or license, or an oil and gas unit agreement.

(d) Timely appealing or requesting reconsideration of a decision described in (c) of this section does not automatically stay the decision. However, the commissioner will impose a stay, on the commissioner's own motion or at the request of an appellant, if the commissioner determines that the public interest requires it.

(e) A decision takes effect immediately if no party is eligible to appeal or request reconsideration and the commissioner waives the commissioner's right to review or reconsider the decision. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:	AS 03.05.010	AS 38.04.900	AS 38.08.110	AS 41.15.020	AS 46.15.020
	AS 29.65.050	AS 38.05.020	AS 38.09.110	AS 41.17.055	AS 46.17.030
	AS 29.65.120	AS 38.05.035	AS 38.50.160	AS 41.21.020	

11 AAC 02.070. WAIVER OF PROCEDURAL VIOLATIONS. The commissioner may, to the extent allowed by applicable law, waive a requirement of this chapter if the public interest or the interests of justice so require. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:	AS 03.05.010	AS 29.65.120	AS 38.05.035	AS 38.50.160	AS 41.21.020
	AS 03.10.020	AS 38.04.900	AS 38.08.110	AS 41.15.020	AS 46.15.020
	AS 29.65.050	AS 38.05.020	AS 38.09.110	AS 41.17.055	AS 46.17.030

11 AAC 02.080. DEFINITIONS. Repealed. (Eff. 11/7/90, Register 116; repealed 9/19/2001, Register 159)

Editor's note: The subject matter formerly set out at 11 AAC 02.080 has been moved to 11 AAC 02.900.

11 AAC 02.900. DEFINITIONS. In this chapter,

(1) "appeal" means a request to the commissioner to review a decision that the commissioner did not sign or cosign;

(2) "appellant" means a person who files an appeal or a request for reconsideration.

(3) "commissioner" means the commissioner of natural resources;

(4) "decision" means a written discretionary or factual determination by the department specifying the details of the action to be allowed or taken;

(5) "department" means, depending of the particular context in which the term is used, the Department of Natural Resources, the commissioner, the director of a division within the Department of Natural Resources, or an authorized employee of the Department of Natural Resources;

(6) "request for reconsideration" means a petition or request to the commissioner to review an original decision that the commissioner signed or cosigned. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:	AS 03.05.010	AS 38.05.020	AS 38.09.110	AS 41.17.055	AS 44.62.540
	AS 29.65.050	AS 38.05.035	AS 38.50.160	AS 41.21.020	AS 46.15.020
	AS 29.65.120	AS 38.08.110	AS 41.15.020	AS 44.37.011	AS 46.17.030
	AS 38.04.900				

Editor's note: The subject matter of 11 AAC 02.900 was formerly located at 11 AAC 02.080. The history note for 11 AAC 02.900 does not reflect the history of the earlier section.

Appendix D

SSE-1369-K, Bay View Timber Sale Comments & Responses

Department of Natural Resources, Division of Forestry
August, 2019

The following comments were received during the public comment period on the Bay View Timber Sale.

Organization	Author	Location
ADFG Division of Habitat	Mark Minnillo/ Ross Dorendorf	Craig/ Ketchikan, Alaska
	Cheryl Fecko	Craig, Alaska
City of Thorne Bay	Harvey McDonald (Mayor)	Thorne Bay, Alaska
	Karen Petersen	Thorne Bay, Alaska

Copies of the submitted comments are available upon request.

Commenter	Comment	Response
	Wildlife	
Cheryl Fecko	“my concern for this timber sale is for the integrity of the Prince of Wales Island landscape. Of particular concern are the negative impacts a sale of this size would have on fish and wildlife habitat and the subsistence activities that depend on intact habitats.”	The land classification represented by the Prince of Wales Area Plan scoped the projected future use and contains constraints that mitigate long term impacts of a mix of landowners. The project development and land use are consistent with the classification.
Cheryl Fecko	“As the Land Use Plan develops for this sale, I hope more consideration will be given to reduced clearcut size, and the placement of wildlife corridors and larger stream and beach buffers. The combined negative impacts of timber extraction by other landowners adjacent to this sale should also be a major consideration.”	<p>The small amount of State land in Southeast is committed to a wide variety of uses, including community and economic development, recreation, and conservation. A portion of the state land is designated primarily for forest management and timber sales. The Operable Timber Base (OTB) on state land is just 44,196 acres¹. By law, the state must manage this forest sustainably, protect fish habitat, and make allowance for important wildlife habitat and scenic resources.</p> <p>The small area of State land is surrounded by the 16.7 million acre Tongass National Forest, 9.4 million acres of which is forestland. Of that, 3.3 million acres are classed timberland.²</p> <p>Of the productive timberland, roughly 568,000 acres are considered suitable for harvest. The projected harvested ground for the next 100 years on the Tongass National Forest is 326,623 acres of which 42,479 acres is old growth.</p> <p>Only 1% of the total timberland will have been harvested within the next 100 years or 57% of the suitable land base.³</p> <p>The great majority of the forest is managed for non-timber uses, including subsistence, fishing, and tourism.</p> <p>The cumulative nature of timber activities on state land was considered in the development of the land use plans, legislative designations, and allowable cut. The DOF operates under State statutes and regulations which ensure long term sustainability of renewable resources and protection from significant adverse effects on water quality, fish habitat, and important wildlife habitat and scenic resources.</p> <p>The sale has accommodated the recommendations of the ADFG</p>

¹ From Southern Southeast Area Operational Forest Inventory for State Forest and General Use Lands, Feb. 9, 2016

² Southeast Alaska Forests: Inventory Highlights Sally Campbell, Willem W.S. van Hees, and Bert Mead 2004 Forest U.S. Department of Agriculture, Forest Service Pacific Northwest Research Station Portland, OR General Technical Report PNW-GTR-609 August 2004

³ Tongass National Forest Suitable Ground for Timber Harvest, <https://arcg.is/1qC4DH>

Commenter	Comment	Response
		regarding important habitat on forest land as well as the settlement land in this project. Retention areas are wider than the minimum required for anadromous streams. All fish streams were identified and systematically protected early in the planning process based on field observations. The DOF and ADFG observed and considered adjacent land management history as it worked with the objectives of the sale.
Cheryl Fecko	“The Forest Practices Act establishes minimum standards for such buffers and wildlife corridors, but I would hope the state, if managing for multiple use, would see the importance of strengthening and expanding the size of these buffers to maintain some semblance of habitat over the stated 640 acre unit.”	The FRPA requires that the DOF provide due deference to the ADFG for fish and wildlife subjects for state owned land. The DOF solicited and used the ADFG’s input to accommodate habitat requirements in the design.
ADFG	<p>Based on the layers for the proposed timber sale and the proposed roads to access them near Thorne Bay, I’ve found that there are no known black bear dens near the proposed project area, but one known wolf den that is in the general area. The proposed project area is outside of our recommended 1,200 ft. no activity buffer around the den, but within our half-mile recommendation for reduced noise. The reasoning behind buffering dens by a half mile for reduced noise is to avoid pushing actively denning wolves out of their den. Our specific recommendation is to reduce loud disturbance activities such as blasting, helicopter logging, and road construction. We recommend avoiding these activities during the active denning season from March 15 through July 15. This recommendation is valid only if the den is active. If the status of the den is unknown, its best to assume it is active. Please contact me prior to the loud disturbance activities mentioned above so I can check on denning activity prior to the start of work.</p> <p>The den is important if it is active hence avoiding noise disturbance is only necessary if the den is found to be active.</p> <p>“In order to minimize impacts to wolves, ADF&G recommends that noise disturbing activities located a half mile or less (see areas identified on the “Proposed Thorne Bay Area Timber Harvests” map) from known wolf dens be avoided or minimized for the period March 15 through July 15 of any year that the wolf den is found to be active. For the Bay View Timber Sale, ADF&G wildlife biologists will conduct surveys of the known den site to determine if activity is present.”</p>	No change required. The DOF will implement the suggested operational constraints advised by ADFG.
	Fisheries	
ADFG	In September of 2018, and again in May of 2019, ADF&G surveyed this stream from the culvert located downstream of Water Lake to the junction of 102-70-10720-2007. An electro fisher was used during both surveys to check for the presence of fish. Resident cutthroat trout and Dolly Varden char were captured throughout the stream however, no anadromous fish were captured until just upstream of the confluence with stream 102-70-10720-2007 where juvenile Coho salmon were captured. A 100-foot FRP A retention area should be left along both	No change required. As requested, a retention area exceeding the minimum standard was incorporated in the original project design.

Commenter	Comment	Response
	sides of stream 102-70-10720.	
ADFG	A small, uncatalogued tributary to 102-70-10720, located just upstream from the proposed road crossing of stream 102-70-10720 and entering from the left bank was also surveyed for fish. The stream is narrow, shallow and the stream provides little if any spawning/rearing habitat. Both minnow traps (June 13) and the electro fisher (July 1) were used to survey for the presence of fish. No fish of any kind were captured. This tributary is a Type I-C waterbody.	No change required. Timber has been retained to maintain bank stability in proximity of stream 102-70-10720 and will be operationally avoided upstream.
ADFG	On June 13, 2019, I accompanied DOF on an inspection of a small tributary to stream 102-70-10720. The purpose of the inspection was to determine the presence/absence of anadromous fish in the tributary. Baited minnow traps confirmed the presence of resident Dolly Varden char and cutthroat trout but no anadromous fish. I returned to the tributary on July 1, 2019 and used an electro fisher which again revealed Dolly Varden char and cutthroat but no anadromous fish. I submitted a memo to DOF stating that the tributary was found to be a non-anadromous, Type I-C waterbody however, because there is no physical barrier between stream 102-70-10720, and the tributary does contain habitat suitable for both spawning and rearing by anadromous fish; ADF&G recommends that the tributary receive a 100-foot retention area as it is possible that sometime in the future anadromous fish may use the tributary.	No change required. The requested retention area was incorporated in the original project design.
ADFG	Stream 102-70-10720-2007 This stream is listed in the Anadromous Waters Catalog as cutthroat rearing. However, additional nomination information added Coho rearing as well. Although this stream is considered a tributary to 102-70-10720, most of the anadromous spawning and rearing habitat in the drainage occurs in this Type I-A waterbody. A minimum 100-foot no harvest FRPA buffer should be left along both sides of 102-70-10720-2007 as well as around the lake at the head of the drainage. To ensure wind firmness, the area between 100 and 300 feet from the stream should retain enough trees to buffer the required 100-foot retention buffer.	No change required. As requested, a retention area exceeding the minimum standard was incorporated in the project design.
	Water Quality	
Karen Petersen	<p>"I am concerned about this sale for several reasons: the impact to the Thorne Bay Municipal Watershed and drinking water quality,"</p> <p>"At this time the City is undergoing a major overhaul of the municipal water treatment facility in hopes of bringing this water quality situation in compliance - but the redesigned water treatment plant was engineered with the existing conditions in consideration. I believe this timber sale will negatively impact our water quality both from the harvest and the hauling along the road by the lake."</p>	<p>Hauling, road construction and harvesting will not occur in the municipal watershed (Water Lake). The contributing topography to the watershed was field verified by DOF staff. Harvest units were set back from the watershed to respect its functional importance to the community.</p> <p>Regardless, the FRPA will be implemented by contract requirements to maintain existing water quality downstream of the watershed. The FRPA best management practices have a track record of being implemented and maintaining water quality.</p>

Commenter	Comment	Response
	View Shed	
Karen Petersen	<p>My second concern is to the viewshed of Thorne Bay. Our community was impacted heavily by the closure of Ketchikan Pulp company, and it is only now recovering. Part of our recovery is the increase in visitor related businesses that have moved to Thorne Bay. They market this community as a wilderness destination and I believe this timber sale – especially the portion right along the bay will be a negative impact to this economy. The City of Thorne Bay relies on Sales Tax and a Bed Tax for municipal revenue. Additionally, we have a small cruise ship that comes into Thorne Bay, and next year the company intends to send a larger ship to Thorne Bay. The visitor's that come spend money in the community, and their visits here provide jobs in the various visitor based businesses. I believe this timber harvest will be a negative impact to our community financially and aesthetically.</p>	<p>Some of the harvest operations will be visible from Thorne Bay. The area surrounding the community of Thorne Bay has been historically and is still used for timber production. Harvest operations are visible throughout the area and as you enter the community of Thorne Bay by water, air or road. This project harvests a combination of land classifications. The State Forest proposed for harvest is not visible from the community.</p> <p>The DOF acknowledges the changing community needs and demographic. It recognizes the backdrop as a visual resource for many in the community. As the result of feedback gathered during the public process, the DOF has modified the original harvest extent west of the 3000150 Road as it traverses above the community center. The DOF has modified the footprint of the sale immediately adjacent to the community, creating a timber retention area on the hillside that shields most of the visual impact to observers from the north harbor area. See revised Appendix A maps.</p> <p>Some of the settlement land proposed for harvest further to the east, though, will be visible from the bay as a traveler enters or exits the bay. DNR determined that this was appropriate in order to provide staging for future settlement access to the area and portions of the shoreline for a variety of uses.</p>

Commenter	Comment	Response
	Public Input	
Karen Petersen	<p>“Lastly, I am concerned that this timber sale has had almost no opportunity for public input before it was designed and set up. The only time I am aware that any representative from the State came to town was to present at a City of Thorne Bay Council meeting about a month ago.”</p> <p>“I would like to respectfully request that the State of Alaska remove this sale from consideration, and then come to the City of Thorne Bay with an opportunity to review a new timber sale and all possible options for mitigation.”</p>	<p>The design of the project is a product of multiple inputs; public input is one part of a multifaceted process. The DOF looked at the land base in conjunction with the DMLW to develop a proposed plan that would deliver needed timber resources to the Prince of Wales economy while developing the land base for future use. DNR decided to include the Settlement-classified land in the timber harvest because of the prospective use of the area over the next several decades.</p> <p>Incorporating local input was recognized as important to the project’s success. For that reason, community leaders and managers were consulted at several points prior to the public forum and involvement associated with the PBIF that you reference. The extent of the action initially proposed in the PBIF is a product of what was discerned by DOF as physically possible based on field work and design within the constraints of the area planning documents. The DOF, in consultation with DMLW, considered the public input offered at the City council workshop and modified the project accordingly.</p>
	Local Manufacture	
Karen Petersen	<p>“At this meeting all of the council members expressed surprise that this sale was happening and when they requested that at least the timber go to a local mill they were informed that timber was already pre-destined. If this is correct, then that is a terrible way to do business.”</p>	<p>The DOF manages the State timber in Southeast to provide timber to a variety of operator sizes. The DOF has and will continue as economic conditions allow to provide timber to both the small operators at Goose Creek and the larger mill in Klawock. This sale will provide a mix of timber sale sizes. The road construction needed to access the timber points to a large sale initially to cover those costs. Smaller sales can be offered after the road infrastructure is in place.</p>
	Road Management/ Development	
City of Thorne Bay	<p>The first concern is hauling of logs from the sale area. We want to be assured that no logs will be hauled through the City proper. There is a reasonable route that goes down the Sandy Beach road through the By-pass road, down to the main road going out of Thone Bay. The use of the By-pass road does go through the Greentree Heights Residential housing development area. So, some consideration will be needed there.</p>	<p>Logs will not be hauled through the core of the residential area in north Thorne Bay because of residential density and associated uses. The designated haul route for the sale will be north through the existing State Forest Road system to the Sandy Beach Road then south and finally along the Bypass Road to the highway leading out of Thorne Bay.</p>
City of Thorne Bay	<p>If during the dry season some dust abatement should be done for the residents of the area. Also, some signage will be necessary to make the public aware of hauling in the area. The by-pass road is a gravel road, it will require routine maintenance</p>	<p>The DOF will require timber sale purchasers, through the timber sale contract, to maintain all roads used in conjunction with this project in proportion to their use. Maintaining any road entails the proper grading to maintain the function of the road and the maintenance of</p>

Commenter	Comment	Response
	with the need for additional surface replacement material.	water quality. Surface integrity (replacement as necessary), appropriate grading and drainage management along with signage of hazards are all part of this maintenance.
City of Thorne Bay	<p>The second concern is development of the haul roads in the sale area. The sale area has future possibilities for residential development. Location of the haul roads needs to be considered for the future development of a residential area.</p> <p>If logging roads are planned in future resident use areas they need to meet City road standards or be brought up to City road standards before any platting will be approved. The City would like to have the opportunity to review the lay-out of the haul route with your engineers when designing the haul road for this sale.</p>	<p>The DOF has worked with the DMLW on the location of the roads. Roads were placed on the terrain to meet the requirements for timber harvest and for eventual use in a subdivision. A wider road or the center of a higher order vertical and horizontal road alignment is generally feasible within the clearing footprint of the planned road. The main roads in the project are characterized as DOF Secondary Forest Roads that are further specified to site-specific conditions. A minimum horizontal radius of 80 FT. was used to locate and flag the centerline. Road centerlines located in this phase of the project were also constrained by a maximum grade of 12% in either direction without cuts or fills on centerline that would exceed 10 FT. The flagged profile grade of the road is typically less than 8%. The profile grade shall have no vertical curves with a curve length less than 80 feet when the algebraic difference in the grade change is less than 10 percent, or a curve length of less than 100 feet when the algebraic difference of the grade change is greater than or equal to 10 percent. The road surface will consist of 12"- 24" of well-graded subgrade with D50 of 3" or greater (shot rock).</p>

Appendix D.1

SSE-1369-K, Bay View Timber Sale Comments & Responses, [addition]

Department of Natural Resources, Division of Forestry
April, 2020

The following comments were received after the public comment period on the Bay View Timber Sale.

Organization	Author	Location
	Karen Petersen	Thorne Bay
	James F. Baichtal	Thorne Bay
Member, Planning and Zoning Commission of Thorne Bay	Jim Nieland	Thorne Bay
JKForest Products	Josh Kohn, Jay Kohn	Thorne Bay
	Stan McCoy	Thorne Bay

Copies of the submitted comments are available upon request.

Commenter	Comment	Response
	General Timber Sale Input	
Josh Kohn, Jay Kohn	<p>“Next, is I would like to see it put in the timber contracts that logs left behind be decked up and not allow them to intentionally run chainsaws through the decks to ruin the chance for commercial firewood operations”... “It’s very possible on this particular sale the state could make an additional 5000+ on logs left behind if this is done.”</p>	<p>The residual product you describe on the landings is likely the outcome of the logger attempting to merchandise for saw logs within acceptable limits of defect. It is unlikely that the logs are purposefully being slashed to hinder fuel wood recovery. The DOF will discuss this with the purchaser in the preoperational meeting to see if a better approach might be developed.</p>
	Subdivision Layout / City Planning	
Karen Petersen	<p>“There was also concern about the municipality having to provide services to a new subdivision when they are struggling to provide services to the existing subdivisions (power, road maintenance and fire and EMS primarily).”</p>	<p>No change required. The DNR recognizes the appropriateness of cooperating with the municipality on these subjects as it makes more land available in the area.</p>
Josh Kohn, Jay Kohn	<p>“While I realize the smaller the lots the more the state can sell but I can’t see lots being any smaller than 2.5 acres. I think lots should be in the 4-5 acre range depending on topography. Each lot will need to support its own septic and water and maybe even power. Short of a grant there will most likely never be city utilities brought to the new lots. I’m not sure how long our property has been platted but we still have no land based phone services.</p> <p>I do think the state is missing out on potential lots, I think all the waterfront lots along the sale area should be put up for sale as well. Probably sell those lots with timber standing to keep view. Most people who bought them wouldn’t clear cut them.”</p>	<p>No change required. The DNR concurs that lot size is a function of several factors; some that it can influence and others it cannot. Flexibility to address site constraints is desirable to make a lot feasible to develop. As the lots are developed by DMLW Surveys, they will take all these issues into consideration. Lots are historically more attractive to purchasers if they do not have to log them first to do specific development. The DOF has reserved timber from harvesting adjacent to the beach.</p>
James Baichtal	<p>“The State of Alaska should provide power to the subdivision, adding the cost of installation to the lot price.</p> <p>Design of the subdivision, access, and lot placement should be developed with the help of the City of Thorne Bay and the City’s Planning and Zoning Commission.”</p>	<p>No change required. The DNR considers the appropriateness of public infrastructure and utilities as it subdivides land. It makes provisions for utilities (ROW, etc.). The DNR typically works with the local municipality and platting authority during the platting process. The feasibility and appropriateness of spending State funds on infrastructure in a specific area is influenced by but not limited to such things as the State budget and competing needs.</p>

Commenter	Comment	Response
	Roads	
Karen Petersen	<p>“At these meetings [<i>meetings of the Thorne Bay City Council and the Thorne Bay Planning and Zoning Commission.</i>] there was a lot of concern expressed about my original comments [<i>documented in appendix D</i>], as well as concerns about the quality of roads that are being proposed, and the impact to the City of Thorne Bay at inheriting substandard logging roads that are puncheon covered with gravel.”</p>	<p>This phase of the development is focused on access. Logging roads have provided initial access to much of SE Alaska. The adequacy of the roads is dependent on the use. Use changes with time. As an area develops it is likely that the appropriate road standard will change as well, and roads may need to be improved. The DNR is removing the timber in this phase; the forest road standards are appropriate for this phase. The DOF has several classifications of road. The DNR will specify a prudent road classification in the Forest Land Use Plan and utilize the timber sale contract to control the quality of the product.</p>
Josh Kohn, Jay Kohn	<p>“I would like to see the state be in charge of the road building. Basically have the road put in then and then put the right of way logs up for bid. Either way the timber stumpage is paying for roads to be built, and if the roads are built better the eventual lots will be worth more or less depending on road conditions . The lots can be listed for as high of price as state wants . However it will make little difference if road is so bad no one is willing to purchase lots.”</p>	<p>The DNR has done similar construction and sales in the past. Budget and staffing constraints make this approach currently out of the scope of the project. See Peterson reply for discussion on road quality control.</p>
Josh Kohn, Jay Kohn	<p>“I think the bottom road past waste treatment plant would be great, though I do not see it ever happening unless someone other city can put it in. To be a viable option the road would need to be modified starting about the city dock just to make it a safe 2 lane road. Personally I would look at putting a permanent entrance through city watershed if possible.”</p>	<p>The DOF observed the route on the ground in the spring of 2019 and developed a reconnaissance level design for a two lane road. The design goal was to ascertain the feasibility of construction using conventional methods and means. The DOF believes the route is buildable to a grade of less than 10 %.</p>
James Baichtal	<p>Access to the subdivision has been proposed as an extension of Shoreline Drive. The proposed access would skirt the Waste Water Treatment Facility paralleling the beach for a short distance and climbing at 12-13% grade to the constructed timber harvest road above. This will require full bench road construction facing the bay. The City of Thorne Bay would be responsible for the construction of the road. This would bring all the traffic from the subdivision, along the beach and onto the end of Shoreline Drive. Shoreline Drive is 1 ½ lanes wide while the bridge over Deer Creek is single lane. Upgrades of Shoreline Drive between the Thorne Bay Market and Waste Water Treatment Facility would be needed to increase the road width to two lanes. Widening the Deer Creek bridge to two lanes is also necessary.</p>	<p>The feasibility of the construction was in a general sense confirmed. While the slope of the sidehill is steep in several areas the pitch length of the hillside is relatively short and workable using conventional methods. The steepness of several sections is notable for the development of appropriate geometric design; the geology does not present unmanageable conditions or unstable soils. Further geotechnical definition and site design is recommended to budget a construction program. While the project of upgrading the alignment and capacity of the Shoreline Drive through the community would be needed for significant land use to the east, it is also part of the expansion and adaptation of the community in general from a logging camp to a permanent community. As specific use develops it will become a priority that will likely be programed for on more than the local level.</p>

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		Access through or adjacent to the city watershed is feasible. The DOF proposed development will tie into the existing system below the Water Lake dam. Tying into the road system provides long term options to the community for access and DNR to manage the area. Regular traffic though the watershed may not be appropriate, considering other constraints on the community.
James Baichtal	The State of Alaska Department of Environmental Conservation (ADEC), Lagoon Construction Guidelines (2009) require that a lagoon shall be placed a minimum of 330 feet (100 meters) from all roads. The distance between the lagoon and the mean high tide line is 100.8 feet (30.7 meters). There is no room to extend Shoreline Drive and meet those requirements.	The ADEC Guidelines for Lagoon Construction are not applicable constraints or guidelines for construction adjacent to the Thorne Bay wastewater treatment plant (per ADEC Ray Zimmer). The plant is not considered a lagoon treatment method. Setback requirements or guidelines do not exist for this type of facility. The appropriateness of future construction would consider, among other things, the structural integrity of the existing facility components and the future needs of the site.
Josh Kohn, Jay Kohn	“The rock that gets pulled out of the creek by the state along the highway by the old sort yard coming into Thorne Bay could be used in the road building to reduce some costs. I am not sure who controls that rock though I have been told it is just given to the city.”	No change required. Thanks for the idea.
Jim Nieland	“Road drainage from logging development road, if directed onto [<i>any steep slopes above town, which might be in the harvest boundary</i>], increases the risk of triggering landslides. It has been said, and I believe it, that for every mile of road constructed in a drainage it has the effect of increasing runoff as though that many miles more miles of stream courses exist. This increases peak flow during heavy runoff events increasing the likelihood of flooding and landslides. Road runoff should not be directed onto slide prone slopes. Roads should be built away from the top of slide prone slopes. No roads should be constructed across these slopes and certainly not on slopes directly above the town.”	The DOF utilizes the Alaska Forest Resources and Practices (FRPA) Best Management Practices to guide management actions. We have planned the road location and harvest to minimize risk and protect public safety downslope. The road location avoids directing runoff onto slide-prone slopes. The concentration of runoff in a drainage can be influenced by several things related to the road as well as the harvest of the timber. FRPA BMPs for both encourage maintaining drainage patterns and bank stability.
James Baichtal	The State of Alaska, Division of Forestry (DOF) Staff indicated that a purpose of this sale is to provide access to future subdivision areas. It was shared that the roads to be constructed would meet the DOF Road Standards for secondary and spur roads. The roads would not be built to residential road standards. It is the intent of the State to subdivide these lands and sell them to the public in a land sale following harvest. Once	Fundamentally access will be created where none existed prior. The use of DOF road standards meets the intent of this project phase. The appropriateness of developing to a higher standard is subject to competing needs of the State. The DOF, in consultation with the DMLW, will seek to maximize the State’s benefit from the logging road construction. Common

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	<p>disposed of, the land would then be conveyed to the City of Thorne Bay. The existing roads would become the responsibility of the City</p> <p>The City of Thorne Bay does not wish to inherit substandard roads, roads that would need to be rebuilt to residential standards and grades. Timber harvest roads must be constructed to residential standards maximizing access to the designed subdivision.</p>	<p>alignments for timber and subdivision roads will assist future development efforts and minimize impact to the landscape. Refinement of the alignments such as widening, lowering grades and changing foundation styles all have a cost. In some cases, it may be practical to include these refinements in initial phases of land development, i.e. the timber harvest contract, while in other cases, these refinements are more practical to implement in the future in a procurement environment such as a construction contract.</p> <p>The subdivision process will create public rights of way (ROW). The ROW within the subdivision is typically held in trust for the public. The municipality, in consultation with the State, elects to manage these areas for the public; they are not inherited. The assumption of road maintenance responsibilities by the City is discretionary throughout the municipal incorporation and land platting processes. The platting process for subdivisions is an inclusive action subject to applicable jurisdictional authorities.</p> <p>While the feasibility of maintenance generally is based on the characteristics of a road, the actual maintenance of roads is dependent on many factors such as priorities, traffic levels and available funding.</p>
	Harvest Area Suitability	
Jim Nieland	<p>“Slope stability and public safety. Stability of the area directly above town if timber is removed or road drainage directed down slope onto unstable glacial till. Currently this area is stable largely due vegetation cover and large trees whose roots stabilize the soil. If these trees are removed the slope will become unstable over time as the roots rot, increasing the possibility of landslides or debris flows. Both homes and the city's sewer treatment plant are potential targets for landslides. Logging should not take place on these steep slide prone slopes.”</p>	<p>All proposed harvest activity is generally located on low to moderate slopes with short pitches. The steeper slopes referenced adjacent to town are not proposed for harvest. The likelihood of landslides and debris flows initiated by State harvest activity is low. While the flow characteristics may change, the drainage patterns will not change due to the harvest activity. Based on the proportion and location of the area being logged on the slope, the risk to stability of the soils is low.</p>
James Baichtal	<p>On slopes facing the bay there are areas of slope instability. These geophysical concerns, include cliffs, bedrock overlain with unstable soil, and pockets of glacial till that will limit or dictate road alignment and harvest unit location. No timber harvest should occur on the slopes immediately above and adjacent to private properties along Shoreline Drive and the Waste Water Treatment Facility. The probability of landslides and excess runoff due to timber harvest on those upper slopes is too high of liability to accept. The State has pulled back the proposed timber sale</p>	

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	boundary to the top of the slope overlooking Thorne Bay. However, there should be no disturbance on the slopes that drain to these areas as increased waterflow.	
Karen Petersen	“The City of Thorne Bay Planning and Zoning Commission has passed a Resolution that will go to the City Council this next week for consideration. This Resolution proposes a modified timber harvest area that will do all of the following: Keep the Viewshed intact, protect the Watershed for Thorne Bay, keep road construction at a minimum and suggest the offering of the sale to all Alaskan sawmill operators. This is the best plan for all, and I support this modification to the Bayview Timber Sale.”	The DOF has modified the harvest area adjacent to the community to accommodate some of the visual concerns. The contributing watershed to Water Lake (actual or codified source of Thorne Bay’s drinking water) has no proposed timber harvest activity within it. The DOF will dispose of the timber following statutory requirements as outlined in the BIF.
Jim Nieland	Short term gain at the expense of long-term impact. The short one-time opportunity to provide a few logging jobs should not be at the expense of thirty years of environmental degradation associated with timber removal. This is counter to the interests of the community and economy.	No change required. The DOF follows the best management practices of the Alaska Forest Practices Act and Regulations to protect the long term resources and interests of the State.
	Local Timber Industry Concerns/ Bid Process Concerns	
Karen Petersen	“Finally – I believe the State would be BEST served if this timber sale was put up to open bid available to ALL sawmill operators. This will ensure that the State gets top dollar for the timber. I am told by local mill operators that this sale could be worth as much as 14 million dollars. While this estimate might be high in a volatile market, the State would benefit the most going through this process. Anything less would be a disservice to the Alaskan people.”	The DOF manages the State timber in Southeast to provide timber to a variety of operators, with a range of sizes. The DOF has and will continue, as economic conditions allow, to provide timber to both the small operators at Goose Creek and the larger mill in Klawock. This sale will provide a mix of timber sale sizes. The needed road infrastructure for access, points to an initially larger sale to cover those costs, followed by subsequent smaller sales, intended for smaller-sized operators. The State will keep interested operators informed on the method of sale of the timber.
Josh Kohn, Jay Kohn	“While I would hope most of the timber will be allowed to be bid on by local manufacturers I suspect 90% will go to Viking. Since there will be more road to build than normal , my opinion is only Viking will be able to afford to get the initial roads in.”	
Josh Kohn, Jay Kohn	“My first suggestion would be to have as little export as possible. Exporting jobs as well as timber will do next to nothing for local economy, while manufacturing it on island will create or keep local jobs. Most of the loggers for Viking tend to be from down south. There will be some local benefits, but negligible if it’s exported.”	
James Baichtal	The State of Alaska needs to openly advertise the sale of timber from the Bay View Timber Sale to all saw mill operators. It was the consensus of local mill operators that the Sale should go to the highest bidder, not be negotiated.	

Commenter	Comment	Response
	Water Quality	
Karen Peterson	“I am still concerned about the impact for the water quality of Thorne Bay, since the proposed sale will be adjacent to the municipal watershed.”	<p>Hauling, road construction and harvesting will not occur in the municipal watershed (Water Lake). The contributing topography to the watershed was field verified by the DOF staff. Harvest units were set back from the watershed to respect its functional importance to the community. The timber type adjacent to the watershed is short and scrubby. This type of timber has a predicted low wind throw potential.</p> <p>The Forest Resource Practices Act (FRPA) will be implemented by contract requirements to maintain existing water quality downstream of the watershed. The FRPA best management practices have a track record of being implemented and maintaining water quality.</p>
Jim Nieland	<p>Protecting the City water Supply. The City of Thorne Bay water source is Water Lake. The catchment area for this watershed needs to be protected for obvious reasons. Both timber harvest and road construction within the municipal watershed must be avoided.</p> <p>The health and safety of all residents depends upon this. This would include any action that would direct road drainage into the basin, or log-haul on roads through the watershed that could affect water quality. Logging near the watershed boundaries should be along wind-firm lines to prevent blowing down of trees within the watershed. This may mean backing away from the watershed boundary and not cutting next to a topographic watershed divide.</p>	
	View Shed	
Karen Petersen	“While Greg Staunton did modify the boundaries of the timber sale by 500 feet to pull back from the shoreline, this does not improve the impact to the viewshed. This is our bread and butter. Thorne Bay relies heavily on the money received from sales tax and bed tax and most of that money comes from tourists. With declining State Municipal Revenue Sharing this money is even more important, and the visitors that come to Thorne Bay are expecting a wilderness experience. The Thorne Bay viewshed is critical to our economy.”	<p>The DOF conducted a viewshed analysis from twelve locations in the municipal area of the project. In keeping with the land classification and the intent of multiple use as defined in AS38.04.910, the timber harvest has been adjusted to not be visible from the City of Thorne Bay core (the north side of the bay). The proposed harvest area is largely obscured from view by the hilly topography of surrounding forested lands. This surrounding timber will be retained in order to maintain the continuity of the shoreline forest resources, to limit the visual impact of the proposed sale to the community of Thorne Bay, and to ensure conservation of slope stability and water quality. However, certain portions of the timber harvest area will be partially visible from some ground- and sea- level viewpoints in the vicinity of Thorne Bay, including the South Harbor, and some nearby fishing lodge floats. Timber has been retained adjacent to the shoreline to accommodate several resources inclusive of retaining visual continuity on the shoreline. Visual impact will be similar to existing conditions in the bay</p>
Jim Nieland	<p>“Thorne Bay has transitioned from a logging to a tourist-based economy. Visitors to Thorne bay now come to enjoy sport fishing, to stay in the many lodges. One cruise ship each week visits Thorne Bay, bringing hundreds of outside visitors to town every year. The visual quality of forested slopes down to the waters edge is a major asset of the town. Removal of trees within the viewshed of Thorne Bay will deteriorate the asset visitors come to see, potentially depressing the economy. The city needs opportunity for economic development but not at the expense of degrading the environment adjacent to town. No timber should be harvested behind town that is visible from the bay. Logging can take place in the uplands away from the bay but not in the viewshed. Logging layout should be guided by a viewshed analysis.</p>	
James Baichtal	“The State of Alaska in development of the Bay View Timber Sale needs to consider possible negative economic impacts of the proposed action to the community of Thorne Bay. The proposed action would forever change the	

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	<p>back drop of the community and the bays and slopes adjacent to the entrance to Thorne Bay. The visual effects of the proposed harvest would lessen the experience of flying into Thorne Bay and recreating here. The economy of Thorne Bay was once centered around timber extraction and associated road construction. Today it is transitioning to a visitor-based economy. Lodges and businesses rely on the setting of Thorne Bay as part of the draw of the community. Damaging the aesthetics of Thorne Bay impacts what visitors come to Alaska to see. The community proposes that any timber harvest be designed to totally protect the viewshed of the community and entrance to the Bay. The community is putting forth a proposal defining the viewshed boundary.”</p> <p>“I am opposed to further clear cutting within the view shed of Thorne Bay, especially adjacent to town. The residents and visitors to Thorne Bay will have to live with the clear cut visual for the next 50 years while it greens up. We live here. I am pretty sure you would not want this in your back yard as well. We have many lodges, cruise ships , and friends and family that come here for an Alaskan experience. They don't know that the forest surrounding Thorne Bay is all older second growth.”</p>	
Stan McCoy	<p>As a resident of Thorne Bay, I reside on the south side of Thorne Bay directly across the bay from the south end of the proposed subdivision. I would like to submit comments that may help to guide the decision process. First, the proposed greenbelt along the shoreline is intended to maintain recreational, subsistence, wildlife, and visual aesthetics for the residents and visitors of Southeast Alaska. There are several bald eagles nest located in the beach fringe below the proposed timber sale. The proposed greenbelt also contains several archeology sites along the shoreline that include petroglyphs and old logging units. The young growth stands are now approaching the age where it is possible to walk through these stands and they provide habitat for deer and other animals.</p> <p>Thorne Bay is receiving more visitors each year with small cruise ships and the residents and visitors enjoy the lush green hillsides along the bay that are viewed on a daily basis. I would hope the State is not considering timber harvest of the young growth areas in this project area. The greenbelt is very popular with the local residents for camping along the beach, picking sea asparagus, and viewing the petroglyphs.</p>	<p>The DOF consulted with and provided due deference to the ADFG-Division of Wildlife concerning habitat. The bald eagle nests have been documented and accounted for in sale planning and layout, pursuant to State law. Furthermore, the archeology sites have been surveyed and documented by the Office of History and Archeology. They will be avoided in timber sale layout and these archaeological resources will be further addressed during the subdivision phase. The young growth, along with the other timber resources near the shoreline, have been excluded from the harvest and will be retained in keeping with the noted recreational and visual use.</p>
	Public Input	
James Baichtal	I think that before planning this, laying it out, and coming to one council meeting that the State should have held more public meetings to hear	The design of the project is a product of multiple inputs, and public input is one part of a multifaceted process. The DOF

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	residents' concerns.	<p>looked at the land base in conjunction with the DMLW to develop a proposed plan that would deliver needed timber resources to the Prince of Wales economy while developing the land base for future use.</p> <p>Incorporating local input was recognized as important to the project's success. For that reason, community leaders and managers were consulted at several points prior to the public forum and involvement associated with the PBIF that you reference. The extent of the action initially proposed in the PBIF is a product of what was discerned by DOF as physically possible based on field work and design within the constraints of the area planning documents. The DOF in consultation with the DMLW has considered the public input gathered from numerous planning steps and adapted the project.</p>