

State of Alaska
Department of Natural Resources
Division of Forestry
Southeast Area - Haines State Forest



Forest Land Use Plan

BABY BROWN TIMBER SALE

NSE – 1549

January 2018

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I. Introduction

Project File Number: NSE - 1549

Division of Forestry Office: Haines

Haines Forester: Gregory J Palmieri

Forest Practices Geographic Region (AS 41.17.950): One

This Forest Land Use Plan (FLUP) describes proposed forest operations on approximately 855 acres of land in the Haines State Forest some 37 miles northwest of Haines. It is intended to provide the best available information regarding the proposed harvest of timber, and management of other non-timber resources in compliance with AS 38.05.112 and AS 41.17.060, and must be adopted by the Department of Natural Resources (DNR) before the proposed activity can occur.

This FLUP is for a timber sale which has been determined to be in the best interest of the state pursuant to AS 38.05.035 (e) and 38.05.945; Best Interest Finding (BIF), Baby Brown Timber Sale/NSE – 1549, March 15, 2015. This FLUP does not determine whether or not to access and sell timber within the timber sale area, nor the method of sale. Those decisions have been made previously in the March 15, 2015 BIF and are not appealable under this FLUP. The BIF and Decision for the Baby Brown Timber Sale may be found at:

<https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=176038>

The BIF was administratively appealed to the Commissioner of DNR on April 6, 2015. The BIF decision was reviewed by the Commissioner and affirmed on October 6, 2015. The DOF marketed the timber and an offer to purchase the timber sale was made in December 2016. A FLUP for timber harvest operations in Unit 1 and Unit 2 of the Baby Brown Timber Sale was prepared and adopted by the Division of Forestry (DOF) Area office in January 2017; the Unit 1 and 2 FLUP was subsequently appealed to the commissioner of the DNR. In June 2017, the potential purchaser of the sale mutually agreed with DOF to not enter into a binding contract to purchase the timber sale. The DNR commissioner directed the DOF to rescind the Unit 1 and 2 FLUP on June 22, 2017 and prepare and adopt a new FLUP covering all timber to be sold prior to selling it. The DOF subsequently completed field design of all of the harvest units and consulted with agency representatives in the summer 2017. This FLUP document contains the information necessary for review of the complete timber sale offering as directed by the DNR commissioner.

This Forest Land Use Plan was made available for public comments; the review period ended on **December 11, 2017**. After public and agency review of the draft FLUP, the DOF reviewed comments (see Appendix D), made changes as appropriate, and has issued this final FLUP. This Forest Land Use Plan has been adopted by the Department of Natural Resources. Site specific compliance with the Alaska Forest Resources and Practices Act and the Regulations, as well as the Final Finding for this proposed project are reflected in this Forest Land Use Plan and will be implemented in the Timber Sale Contract.

A person affected by the final decision who provided timely written comment or public hearing testimony on the draft FLUP may appeal it, in accordance with 11 AAC 02. Any appeal must be mailed or delivered prior to **February 5, 2018** to Andrew Mack, 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. If no appeal is filed by that date, this

decision goes into effect as a final order and decision on **February 15, 2018**. An eligible person must first appeal this decision in accordance with 11 AAC 02 before appealing this decision to Superior Court. A copy of 11 AAC 02 is in Appendix C—Appeals.

This timber sale is designed to be consistent with the management intent of the following documents:

Haines State Forest Management Plan (Rev. 2002)

Chilkat Bald Eagle Preserve Management Plan (Rev. 2002)

Northern Southeast Area Plan (2002)

The administrative record for this sale is maintained at the Division of Forestry Southeast Area, Haines State Forest Office filed as NSE - 1549.

A. Legal Description (see also map in Appendix A): This proposed sale is found within portions of Sections 14, 15, 16, 21, 22, 23, 24, 25, 26, 27, & 36 within Township 28 South Range 53 East, and portions of Sections 19, 28, 29, 30, 31, 32, & 33 Township 28 South Range 54 East, Copper River Meridian. The USGS quadrangle map for this area is Skagway B4, 1:63,360.

B. Operational Period January 1, 2018 – December 31, 2022

C. Timber Disposal

Timber will be sold and will have a contract administrated by the State.

D. Objectives and Summary

1. To follow the Department of Natural Resources (DNR) constitutional mandate to encourage the development of the State's renewable resources, making them available for maximum use consistent with the public interest. Sustain and promote a healthy, long-term timber industry in the state, through providing a secure source of timber for harvest while protecting other resources such as fish and wildlife.
2. To help the State's economy by providing royalties to the state in the form of stumpage receipts, as well as contributions to local economies through wages, purchases, jobs and business.
3. To improve forest growth and vigor by harvesting and replacing mature or over mature forest stands with regenerating stands, while protecting and maintaining other resource values. The actions authorized under this decision will follow the constitutional mandate of sustained yield and shall adhere to multiple use management as described in the Haines State Forest Management Plan (HSFMP).

II. Affected Land Owners/Jurisdictions

	Activity on ownership:	Access	Harvest	Written Representative Approval
A. State				
<input checked="" type="checkbox"/> Haines State Forest		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/> Other state land managed by DNR		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> University of Alaska		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Mental Health Trust		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> School Trust		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B. Other Land Ownership				
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Land Owner: _____

Land Owner Representative: _____

III. Harvest Methods, Silvicultural Actions, and Management of Non-timber Resources

Forest operations will be designed to:

- Protect fish habitat and water quality in compliance with the best management practices in 11 AAC 95.260-.370,
- Manage for the other land uses and activities identified in AS 41.17.060 and the Best Interest Finding for this timber sale, and
- Result in the sustained yield of timber and maintenance of site productivity in compliance with AS 41.17.060(c) and 11 AAC 95 .375-.390.

Harvest and Silvicultural Methods:

The harvest and silvicultural methods are attached to this document in Appendix B.

A. Timber Stand Description and History

The timber is predominately composed of mature and over mature Hemlock/Spruce stands on productive sites within the Haines State Forest. The acres in this sale area have been identified as available for timber harvest as a primary use in the Haines State Forest Management Plan. Historically, some stands between Glacier and Porcupine Creeks in the sale area were harvested in the early 1900's as a result of development to support mining activity in that area. The harvest units addressed in this FLUP have timber ranging from 100 to 250 years old (HSF Inventories, 1965/1985/2012).

B. Timber Harvest Activities

Timber Harvest Activities are displayed in Table 1.

Table 1. Timber Harvest Activities

Unit ID	Acres	Topography	Silvicultural Action	Logging Method
01	52	Broken Hillside/Flat Areas	Partial Cut	Ground-based/Cable
02	79	Broken Hillside	Partial Cut	Ground-based/Cable
03	140	Flat Ridge Top/Hillside	Partial Cut	Ground-based/Cable
04	65	Ridge Top/Hillside	Partial Cut	Ground-based/Cable
05	69	Broken Hillside	Partial Cut	Ground-based/Cable
06	61	Broken Hillside	Clear Cut	Cable
07	34	Hillside	Clear Cut	Cable
08	76	Hillside	Partial Cut	Ground-based/Cable
09	45	Hillside	Clear Cut	Cable
10	149	Broken Hillside/Flat Areas	Partial Cut	Ground-based
11	86	Broken Hillside	Partial Cut	Cable

C. Site Preparation

Site preparation is a performance requirement of the logging contract. A separate site preparation will not be generally necessary in areas with sufficient soil disturbance by logging during the summer and in areas with sufficient residual stocking. If logging activity continues into winter months when more than 12 inches of snow coverage occurs across a harvest unit, subsequent scarification will be required in the absence of snow and frozen conditions.

[] Site preparation will be implemented and described in Table 2:

Table 2. Site Preparation

Unit	Acres	Site Preparation Method	Date of Completion

D. Reforestation

[X] Clear Cut

[X] Partial Harvest:

[] Region I: leaving more than 50% live basal area (11 AAC 95(b)(3))

[] Region II/III: Relying on residual trees to result in a stocking level that meets standards of 11 AAC 95.375 (b 4). Stocking levels will be calculated subject to the methods below:

Table 3. Stocking Level Requirements

Average DBH (Diameter at breast height)	Residual Trees (Trees / acre)	Minimum Stocking Standard (Trees/ acre)	Percent Stocking
> 9"		120	%
6" to 8"		170	%
1" to 5"		200	%
Total Residual Stocking			%

Seedlings Required:

Percentage Under stocked = 100 – Total Residual Stocking %

Percentage Under stocked = 100 – _____% = _____%

Seedlings/ Acre Required = Percentage Understocked/100 x 450

Seedlings/ Acre Required = _____% /100 x 450 = _____

[X] Natural regeneration

Reforestation requirements for these harvest units will be met through natural regeneration of Sitka Spruce and Western Hemlock. Based on prior harvest experience in the adjacent areas, reforestation meeting Region 1 standards is projected to naturally occur. If after five years from harvest completion these standards are found not to be successfully met, the DOF will initiate a planting program to ensure restocking requirements are met in a timely manner.

E. Slash Abatement

Potential for insect infestations caused by slash accumulations exists as harvest debris piles could provide available hosting material for Spruce bark beetles (*Dendroctonus rufipennis*) identified as damaging to live trees when present in high numbers. Slash abatement for controlling infestations will be implemented as required by 11AAC 95.370.

Lop and scatter slash from Sitka Spruce trees harvested; accumulations will be kept to less than 3 feet in height.

F. Timber Harvest—Surface Water Protection

There are no known anadromous classified streams in the harvest units or within 300 feet of the harvest units addressed in this FLUP.

☐ There are no streams or lakes abutting or within a harvest unit.

☒ Known surface waters and protection measures are described in Table 4 below.

Locations are included in the operational map in the Appendices

Table 4. Protection for Known Surface Waters

Unit	Waterbody Name	AS 41.17.950 Classification	ADF&G AWC #	Required Riparian Protection	Site-specific actions to minimize impacts on riparian area
1	NA	Unclassified	NA	None	Full Suspension/Split Yarding
10	NA	Unclassified	NA	None	Split Yarding (all streams)
11	NA	Unclassified	NA	None	Split Yarding (all streams)

Surface waters were reviewed by the Department of Fish and Game:

☒ During the timber sale planning process

☒ During the agency review conducted for the Best Interest Finding for this sale

☒ During the drafting of this Forest Land Use Plan

☐ Stream Crossings (Title 16) Permits are needed per ADF&G Division of Habitat

Surface waters listed were reviewed by the Department of Environmental Conservation:

☐ During the timber sale planning process

☒ During the agency review conducted for the Best Interest Finding for this sale

☒ During the drafting of this Forest Land Use Plan

Non-classified surface waters are subject to applicable BMPs in 11 AAC 95.

G. Wildlife Habitat

☐ Wildlife species and allowances for their important habitats were addressed in writing by the Department of Fish & Game during the Best Interest Finding review.

☒ Wildlife species and allowances for their important habitats were addressed in writing by the Department of Fish & Game during the drafting of this Forest Land Use Plan.

Silvicultural practices to be applied to minimize impacts to wildlife habitat or wildlife management:

☒ Timber retention - concentrations of timber surrounding harvest units, or interspersed within harvest units will provide cover.

☒ Snag Retention- snags or isolated trees left for cavity nesting species.

☐ Large Woody Debris – concentrations of downed timber or logging debris interspersed within harvest units to provide cover left on site.

☐ Other actions

H. Cultural and Historical Resource Protection

☒ This project was reviewed by the State Historic and Preservation Office (SHPO).

☒ No artifacts have been reported within the project area(s).

☐ Known or likely sites have been identified and a mitigation plan is in place. (Describe the mitigation actions.)

I. Other Resources Affected by Timber Harvest and Management

During the Public Review Process of the Baby Brown timber sale Preliminary BIF the DOF received comments referring to the possible view of harvest areas from the Haines Highway. Taking public comment into consideration during the preparation of the BIF a visibility analysis from three observation points along the Haines Highway concluded that approximately 80% of the proposed harvest areas would be visible from those positions. This FLUP presents the final design of the harvest units including a harvest plan that further considers the scenic impacts from the same three observation points along the Haines Highway.

The new analysis of the potential view of all the harvest units designed in this sale concludes that no more than 64% of harvest activities would be visible from any of the three observation points along the Haines Highway.

The harvest plan designed for this sale combines clear cutting with selective harvest of timber that will additionally contribute to the reduction of the visibility of harvest activity from the Haines Highway viewpoints.

The DOF has reviewed the Alaska Department of Transportation planning documents for the Haines Highway improvement project, the Haines Borough Comprehensive Plan, and the Haines Highway Corridor Cooperative Management Plan for identification of scenic value related to the Haines Highway corridor and the potential impacts from the proposed timber harvest on the Haines Highway view shed. The DOF harvest plan prepared for this sale represents a strategic effort to diminish the potential for harvest activities to be visible from the Haines Highway according to the management guidelines and intent described in the Haines State Forest Management Plan (rev. 2002).

Table 5. Other Affected Resources/ Areas of Concern.

Impacted Resource	Reviewing Agency	Impact/ Mitigation Actions
Scenic	DOF	Retention of standing trees in units and distribution of remaining timber around designated units.

IV. Roads and Crossing Structures

A. Road Design, Construction, and Maintenance

Roads will be designed, constructed, and maintained to prevent significant adverse impacts on water quality and fish habitat (AS 41.17.060(b) (5)), and site productivity (AS 41.17.060(c) (5)). Roads will comply with the best management practices in the Forest Resources and Practices Regulations (11 AAC 95.285 – 95.335)

Road construction will follow guidelines described in the contract and HSFMP. Region One forest road construction standards will be used (See Appendix B2).

Roads or other means required for the access and removal of this timber from the harvest areas or units are listed in Table 6.

Table 6. Road Construction and Use

Road ID	Harvest Unit	Road Miles	Road Type	Maximum Grade	Constructed by	Maintained by
Main Haul “East Glacier Creek Road”	Unit 1	1.25	Primary	10%	Existing	Purchaser/ Constantine Metals
Spur A	Unit 1	0.3	Spur	10%	Purchaser	Purchaser
Main Haul 1100 Road	Unit 2 - 5	2.76	Spur	15%	Purchaser	Purchaser
Spur 1110	Unit 2	0.06	Spur	5%	Purchaser	Purchaser
Spur 1120	Unit 3	0.4	Spur	12%	Purchaser	Purchaser
Main Haul 1200 Road	Unit 6 - 7	0.94	Spur	10%	Purchaser	Purchaser
Spur 1210	Unit 6	0.09	Spur	15%	Purchaser	Purchaser
Main Haul Reconstruction 1400 Road	Unit 8 - 9	2.64	Primary	5%	Purchaser	Purchaser
Spur 1305	Unit 8	0.59	Spur	15%	Purchaser	Purchaser
Spur 1410	Unit 9	0.13	Spur	12%	Purchaser	Purchaser

Main Haul 1400 Road	Unit 10 – 11	1.39	Primary	10%	Purchaser	Purchaser
Spur 1420	Unit 10	0.3	Spur	10%	Purchaser	Purchaser
Spur 1430	Unit 11	0.55	Spur	12%	Purchaser	Purchaser

**Note: Roads must be less than 20% grade per 8 AAC 61.1060 Additional Logging Standards*

B. Side Slopes / Mass Wasting

For slopes over 50%, identify indicators of unstable areas (landslide scars, jack-straw trees, gullied or dissected slopes, high density of streams or zero-order basins, or evidence of soil creep. Attach location specific road design that potentially mitigates identified areas of unstable soils.

Maximum percent side slopes: 67%

☐ There are no slopes >50%

☐ There are no indicators of unstable areas where roads will be constructed

☒ Indicators of unstable areas were identified and will be mitigated by actions indicated below.

☒ Full benching will be constructed to help ensure slope stability

☐ Full benching is not required for roads in this project

☒ End hauling will be implemented to help ensure slope stability

☐ End hauling is not necessary for roads in this project.

Gullied/dissected slopes greater than 50% were located along the Main Haul Road construction between Unit 3 and Unit 4 from station 87+52 to 92+32. Full Bench construction with end haul of excavated material will be required through this 480-foot section to maintain slope stability.

Are you removing or replacing drainage structures? ☒ YES ☐ NO

Two drainage structures are scheduled to be replaced along the reconstructed segment of road west of Glacier Creek required in this sale. The first drainage structure replaces a 20' log bridge at station 52+40 and the second replaces a 40' log bridge at station 102+08 respectively along the segment.

General Erosion Control:

☐ grass seeding ☐ erosion control mats ☐ wattle ☒ Other: Water bars and out sloping of spur roads

☐ not applicable

C. Crossing Structures

[] No crossing structures are needed within the project area.

[X] Crossing structures will be placed along access roads as described in the table below:

Table 7. Required Drainage and Crossing Structures on Known Surface Waters

Road	Mile / Station	Diameter Culvert	Bridge Type: -Log Stringer -Fabricated -Ice	AS 41.17.950 Stream Classification	Fish & Game AWC Number	Duration of crossing structure in place
U – 1 Spur A	11+40	18”		Ditch Relief		Setting Access
U2 –U5 MHaul 1100Rd	0+00	18”		Ditch Relief		Permanent (all)
	3+20	18”		Unclassified		
	13+78	18”		Unclassified		
	47+48	18”		Ditch Relief		
	56+32	18”		Ditch Relief		
	68+40	18”		Ditch Relief		
	96+70	18”		Ditch Relief		
	106+62	18”		Unclassified		
	116+76	18”		Unclassified		
	128+60	18”		Unclassified		
	140+20	18”		Ditch Relief		
U3Spur 1120Rd	14+00	18”		Ditch Relief		Setting Access
U6–U7 MHaul 1200Rd	6+18	60”		Unclassified		Permanent (all)
	13+17	18”		Ditch Relief		
	18+60	18”		Ditch Relief		
	35+30	18”		Ditch Relief		

Forest Land Use Plan for Baby Brown/NSE - 1549

Road	Mile / Station	Diameter Culvert	Bridge Type: -Log Stringer -Fabricated -Ice	AS 41.17.950 Stream Classification	Fish & Game AWC Number	Duration of crossing structure in place
1200Rd	43+15	18"		Ditch Relief		
U8-U9 MHaul Reconst 1400Rd	25+72	18"		Ditch Relief		Permanent (all)
	42+90	18"		Ditch Relief		
	52+40	60"		Unclassified		
	91+42	18"		Ditch Relief		
	102+08		40' Log Stringer Bridge	Type I-D		
U8Spur 1305Rd	14+20	18"		Unclassified		Setting Access
U10- U11 MHaul 1400Rd	15+25	36"		Unclassified		Permanent (all)
	21+14	36"		Unclassified		
	26+12	18"		Unclassified		
	36+92	18"		Ditch Relief		
	50+48	18"		Unclassified		
	53+60	60"		Unclassified		
	58+89	18"		Unclassified		
	63+40	18"		Unclassified		
	69+45	18"		Unclassified		
U10 Spur	4+25	18"		Unclassified		Setting Access

1420Rd						
Road	Mile / Station	Diameter Culvert	Bridge Type: -Log Stringer -Fabricated -Ice	AS 41.17.950 Stream Classification	Fish & Game AWC Number	Duration of crossing structure in place
	12.62	18"		Unclassified		Setting Access
U11 Spur 1430Rd	9+64	18"		Unclassified		Setting Access
	13+32	60"		Unclassified		Setting Access
	24+16	24"		Unclassified		Setting Access

D. Road Closure

Roads constructed for the timber sale that are left open will be subject to maintenance standards under 11 AAC 95. 315. Otherwise, roads constructed for the timber sale will be closed, subject to standards under 11 AAC 95.320.

Table 8. Road Closures

Road ID	Units	All Season/Winter	Estimated Closure Date	Projected Road Use after Timber Harvest
Main Haul	1 - 11	All season	None	Silviculture
Spurs	All	All season	December 2023	Silviculture

E. Material Extraction

[] There will be no material extraction sites in the project area.

[X] Material extraction for road construction and associated overburden disposal will be located outside of riparian areas and muskegs. Material extraction and disposal sites will be located by the purchaser operating plan, in a manner that prevents runoff from entering surface waters and will be approved by DOF prior to use. Material sites will be incidental and adjacent to the road construction. Pit sites are projected to be less than one acre and will be stabilized upon completion of road building operations.

[X] Other: The flood plain of Glacier Creek adjacent to the bridge crossing site is designated as a material source location for road construction.

F. Other Resources Affected by Roads or Material Extraction

List resources other than water, habitat or cultural resources potentially impacted by road

construction, and indicate how impacts will be mitigated. Other affected resources could be, but are not limited to mining claims, scenic areas, recreational trails, etc.

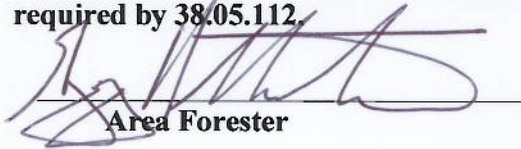
Table 9. Other Affected Resources

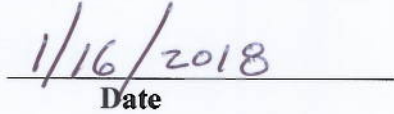
Impacted Resource	Reviewing Agency	Impact/ Mitigation Actions
Scenic	DOF	Location and Design

The DOF has identified road locations for the harvest of timber throughout this sale with consideration of potential visual impacts from the Haines Highway. The majority of harvest road related activity will be shielded from view by remaining standing timber not included in this sale. The harvest design will further reduce the visibility of road development from the Haines Highway.

V. Approvals

This Final Forest Land Use Plan has been reviewed by the Division of Forestry and provides the information necessary to be adopted by the Department of Natural Resources as required by 38.05.112.

 _____
Area Forester

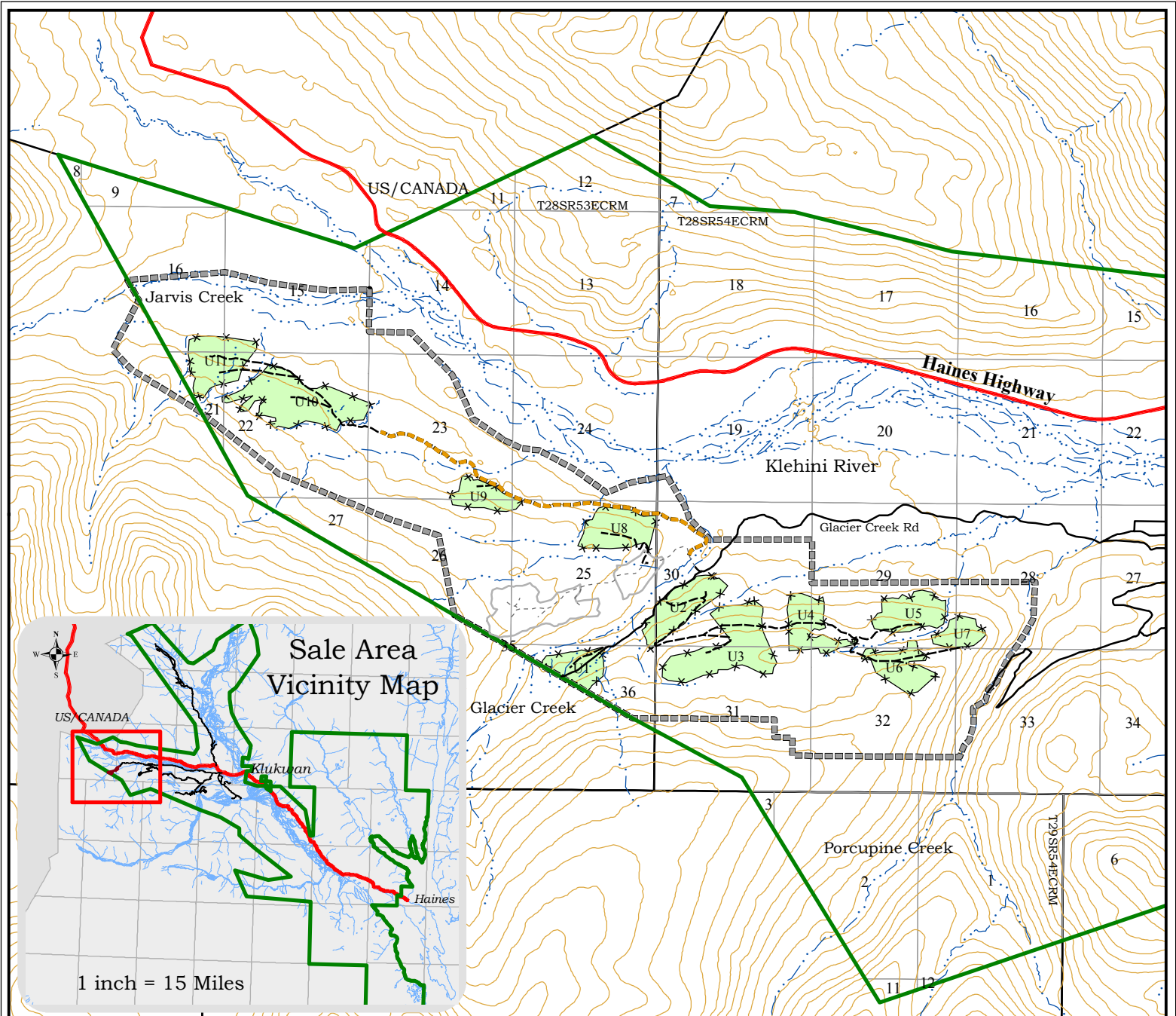
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Date

A person affected by the decisions in the final FLUP who provided timely written comment or public hearing testimony on the draft FLUP may appeal it, in accordance with 11 AAC 02 (see Appendix C. Any appeal must be received by **February 5, 2018** and may be mailed or delivered to Andrew Mack, 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. If no appeal is filed by that date, this decision goes into effect as a final order and decision on **February 15, 2018**. An eligible person must first appeal this decision in accordance with 11 AAC 02 before appealing this decision to Superior Court. A copy of 11 AAC 02 is in Appendix C—Appeals.

If you have any questions, please contact Greg Palmieri of the Southeast Area Field Office in Haines at (907) 766-2120 or e-mail greg.palmieri@alaska.gov.

Appendix A: Timber Sale Maps

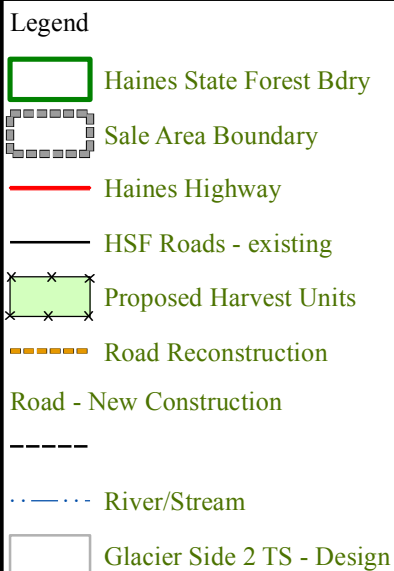
Exhibit A1: Sale Area



Map Projection: State Plane NAD83 2011
Contour Interval - 200 feet



Map Scale:
1 inch = 1 Mile



HAINES STATE FOREST BABY BROWN Timber Sale NSE - 1549 Sale Area Map - Exhibit A1



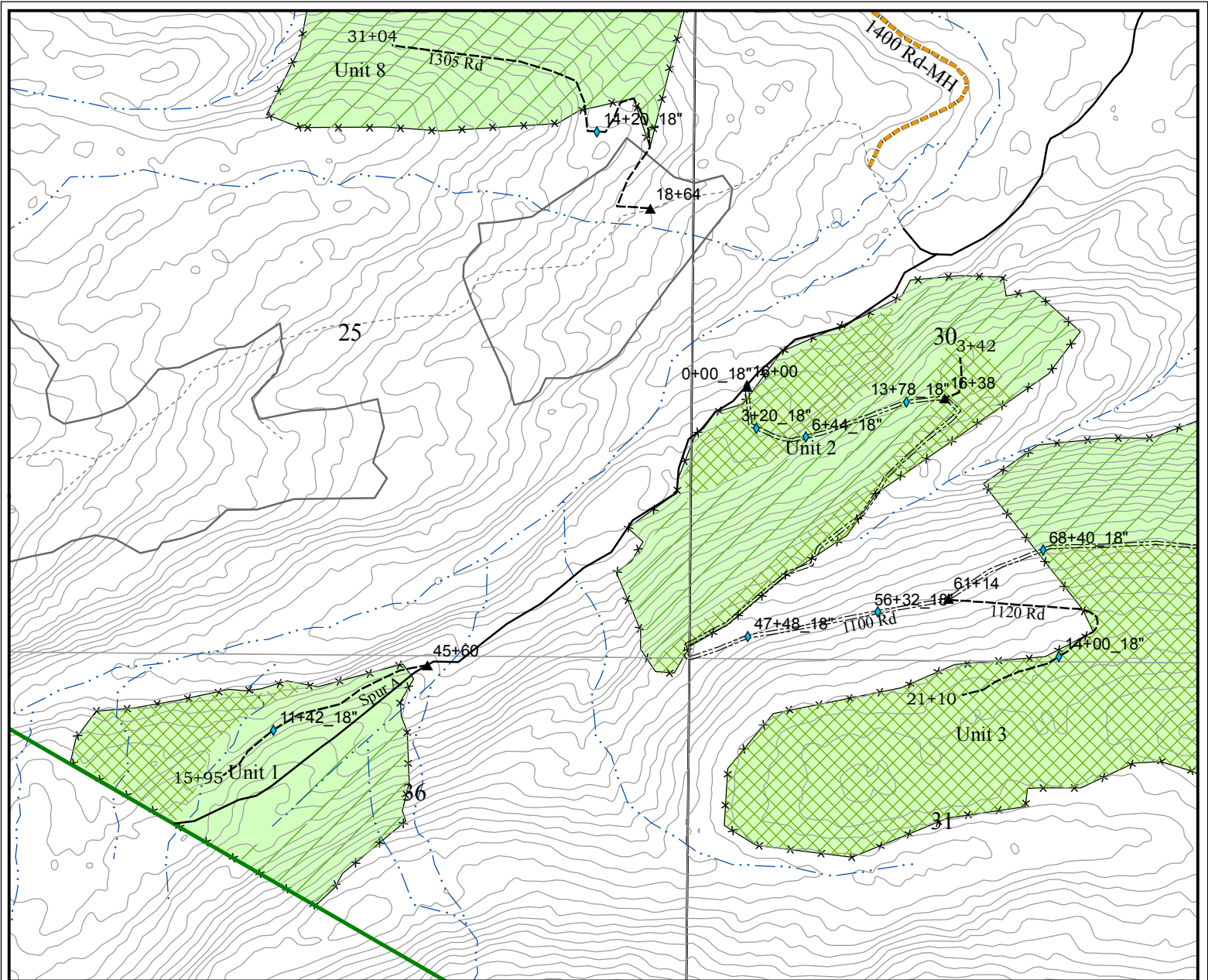
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Haines Office

Prepared by: HNS/DOF/GJP - 10/2017

"Develop, conserve, enhance, and manage the state's forests to provide a sustainable yield of forest resources for Alaska ..."



Exhibit A2: Unit Harvest Detail (5 Maps – 11 Units)



Map Projection: State Plane NAD83 2011
Contour Interval - 25 feet

Map Scale:
1 inch = 1000 feet

Legend	
	Haines State Forest Bdry
	HSF Roads - existing
	Proposed Harvest Units
Harvest System Design	
	Ground
	Cable
Road - New Construction	
	Spur
	1100 Rd - MH
	Drainage Structure
	River/Stream
	Glacier Side 2 TS - Design

HAINES STATE FOREST BABY BROWN Timber Sale NSE - 1549 Harvest Detail Map Units 1 & 2 - Exhibit A2

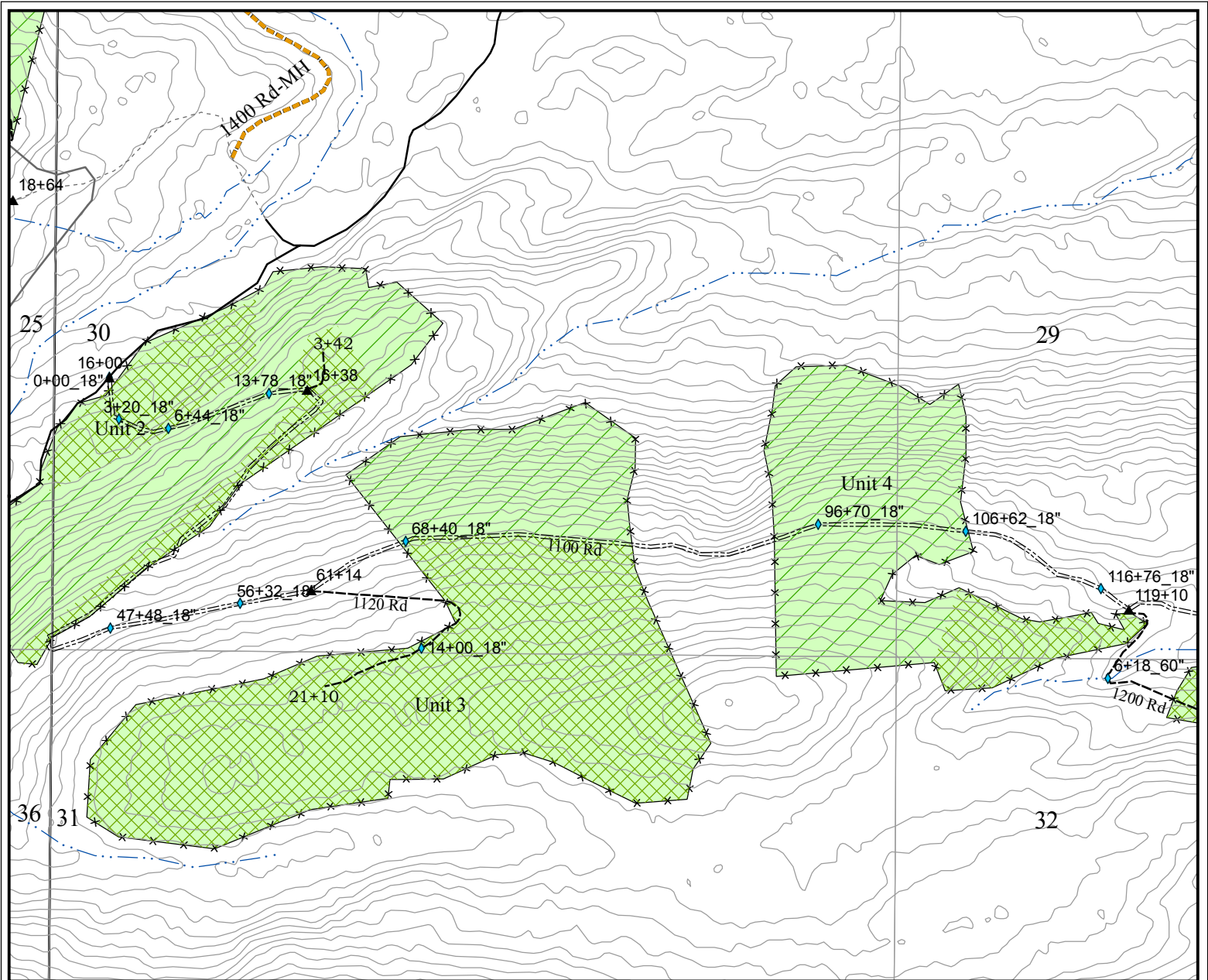


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Map Projection: State Plane NAD83 2011
Contour Interval - 25 feet

Map Scale:
1 inch = 1000 feet

Legend	
	Haines State Forest Bdry
	HSF Roads - existing
	Proposed Harvest Units
Harvest System Design	
	Ground
	Cable
Road - New Construction	
	Spur
	1100 Rd - MH
	Drainage Structure
	River/Stream
	Glacier Side 2 TS - Design

HAINES STATE FOREST BABY BROWN Timber Sale NSE - 1549 Harvest Detail Map Units 3 & 4 - Exhibit A2

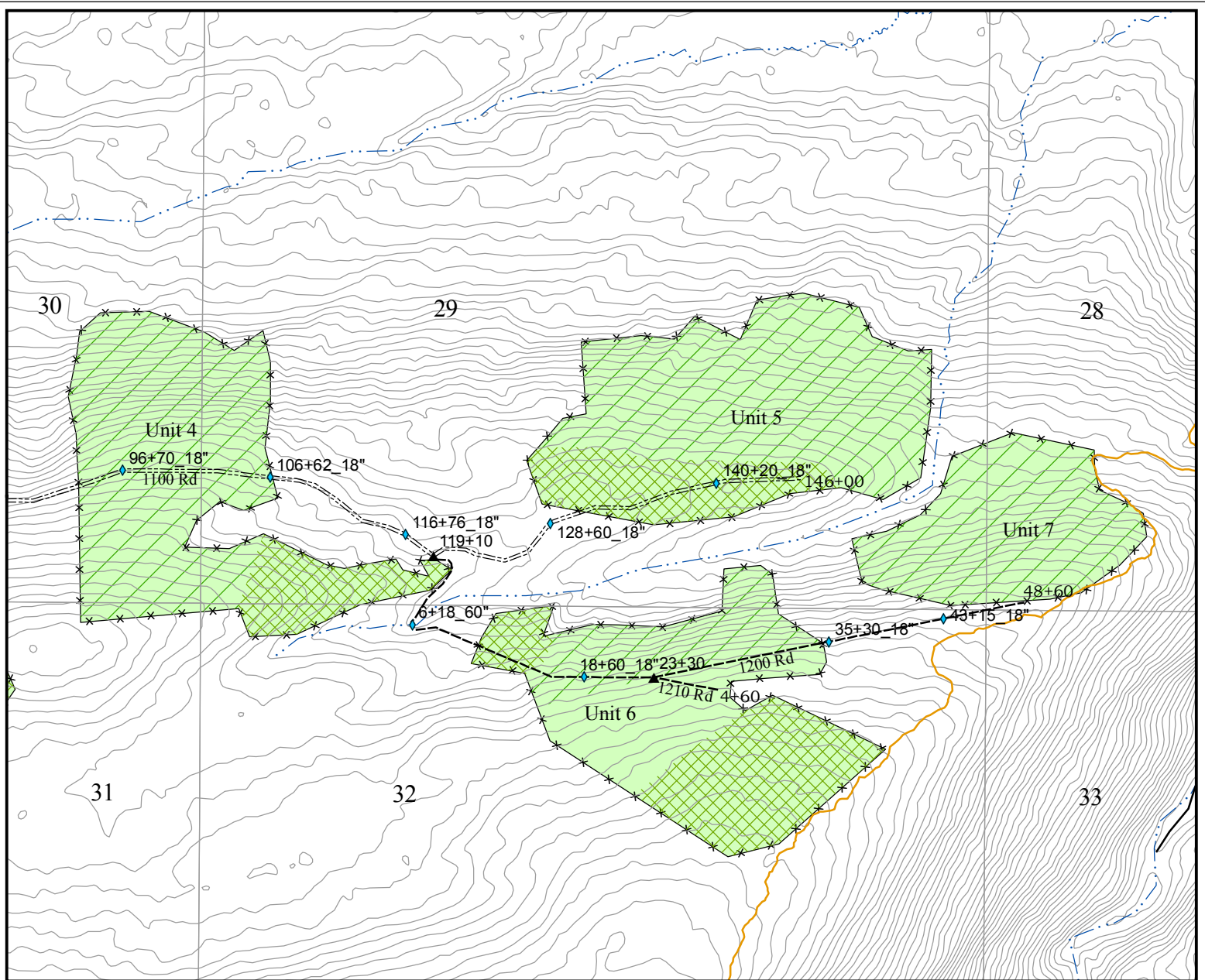


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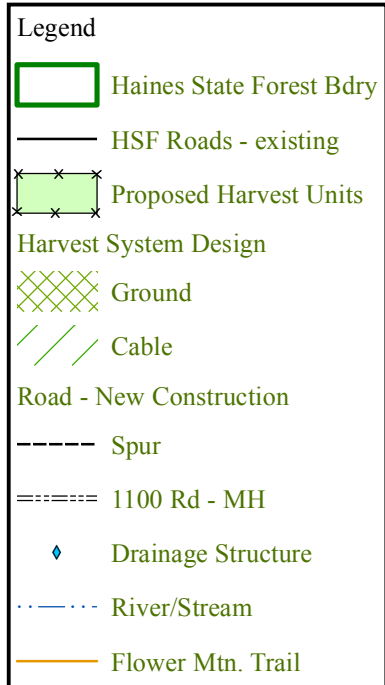
"Develop, conserve, enhance, and manage the state's forests to provide a sustainable yield of forest resources for Alaska ..."





Map Projection: State Plane NAD83 2011
Contour Interval - 25 feet

Map Scale:
1 inch = 1000 feet



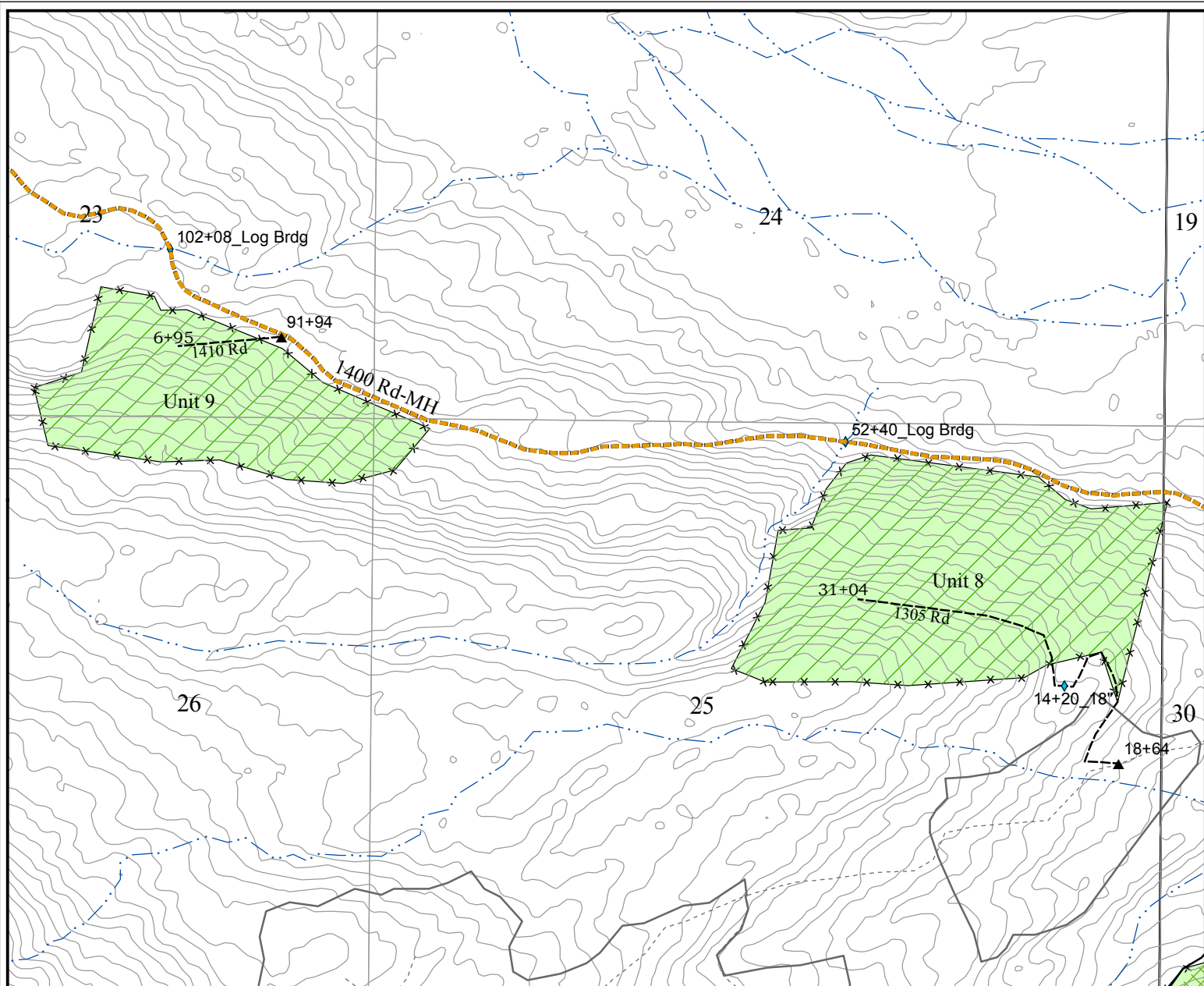
HAINES STATE FOREST BABY BROWN Timber Sale NSE - 1549 Harvest Detail Map Units 4, 5, 6, & 7 - Exhibit A2

State of Alaska
Division of Forestry
Haines Office

Prepared by: HNS/DOF/GJP - 10/2017

"Develop, conserve, enhance, and manage the state's forests to provide a sustainable yield of forest resources for Alaska ..."





Map Projection: State Plane NAD83 2011
Contour Interval - 25 feet

Map Scale:
1 inch = 1000 feet

Legend

Haines State Forest Bdry

Proposed Harvest Units

Harvest System Design

Ground

Cable

Road Reconstruction

Road - New Construction

Spur

1400 Rd - MH

Drainage Structure

River/Stream

Glacier Side 2 TS - Design

HAINES STATE FOREST BABY BROWN Timber Sale NSE - 1549 Harvest Detail Map Units 8 & 9 - Exhibit A2

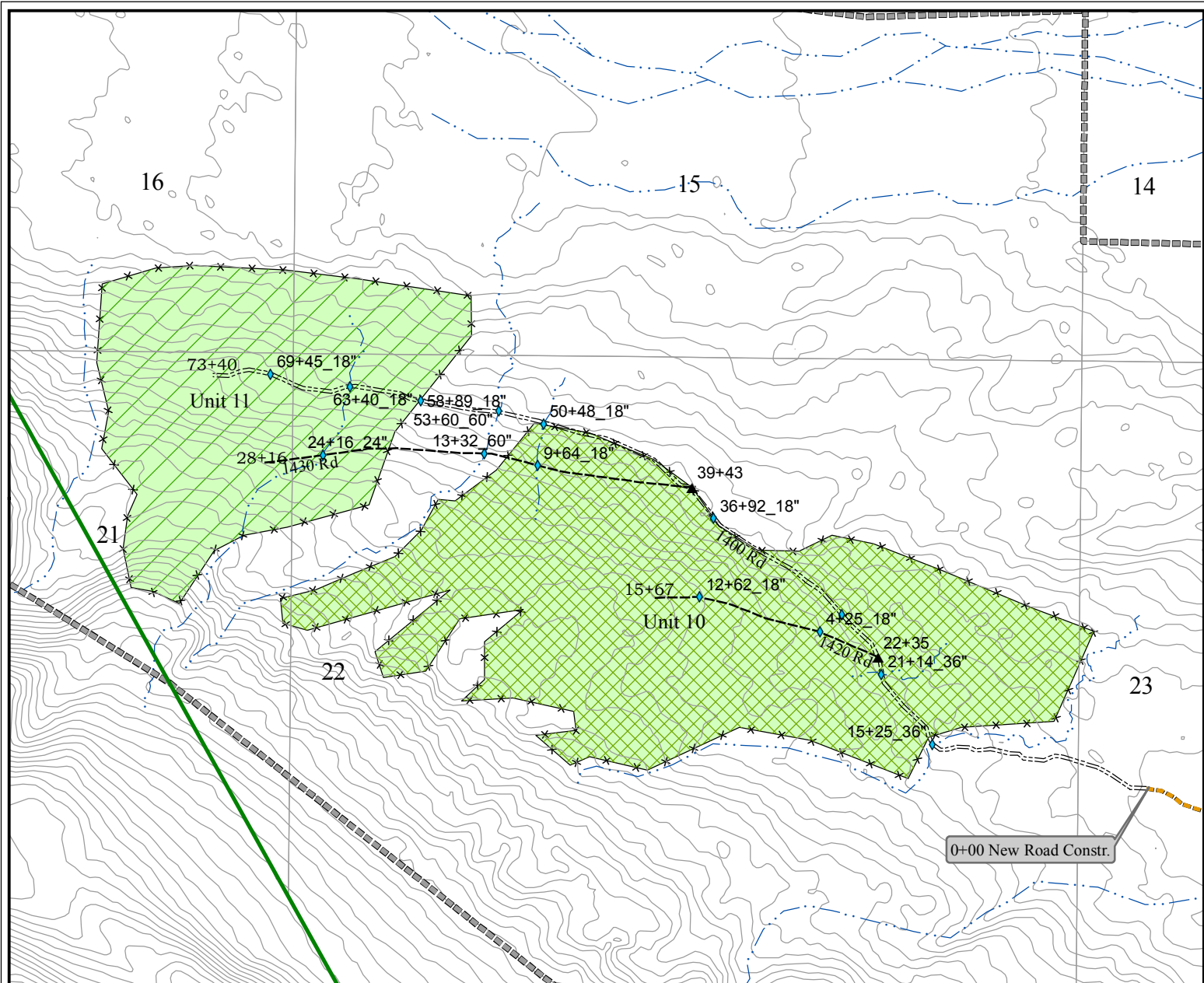


State of Alaska
Division of Forestry
Haines Office

Prepared by: HNS/DOF/GJP - 10/2017

"Develop, conserve, enhance, and manage the state's forests to provide a sustainable yield of forest resources for Alaska ..."





Map Projection: State Plane NAD83 2011
Contour Interval - 25 feet

Map Scale:
1 inch = 1000 feet

- Legend**
- Haines State Forest Bdry
 - Sale Area Boundary
 - Proposed Harvest Units
 - Harvest System Design**
 - Ground
 - Cable
 - Road Reconstruction
 - Road - New Construction
 - Spur
 - 1400 Rd - MH
 - Drainage Structure
 - River/Stream

HAINES STATE FOREST

BABY BROWN Timber Sale

NSE - 1549

Harvest Detail Map

Units 10 & 11 - Exhibit A2



State of Alaska
Division of Forestry
Haines Office

Prepared by: HNS/DOF/GJP - 10/2017

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Appendix B: Supporting Information

B1: Silvicultural/Timber Stand Information

HARVEST AND SILVICULTURE METHODS

The silvicultural design for this sale will be a partial cut method retaining standing timber in groups and selectively dispersed across areas within or adjacent to clear cut areas. This approach is intended to produce smaller clear cut openings and structural diversity within the harvest unit. The design application of this method will be applied within each harvest unit under the administration of the State.

Harvest Design Goals

1. Standing Timber in small groups and timber selectively dispersed within areas of a unit.
 - a. Provide visual structural diversity of larger clear cut areas.
 - b. Provide habitat diversity within units by retention of large mature trees exhibiting clear signs of significant decay and smaller non-merchantable trees.
 - c. Improve economic viability of the timber sale.
 - d. Provide soil retention and stability by reducing the change in hydrological flow through the harvest area immediately following harvest.
2. Standing Timber selectively dispersed within areas of a unit.
 - a. Provide visual structural diversity of larger clear cut areas.
 - b. Provide soil stability by reducing potential initial water flow impacts resulting from timber removal.
3. Clear Cut areas within unit.
 - a. Provide openings within units rather than clearing the entire unit to reduce visual impacts of timber harvest.
 - b. Provide beneficial even age management characteristics on the harvest unit such as:
 1. solar penetration to the forest floor enhancing natural regeneration and
 2. soil disturbance that increases the volume of seedling, orb and browse species development.

Harvest Design Objectives

1. Standing Timber in groups.
 - a. Minimize the visual impact of harvest areas.
 - b. Mitigates habitat removal in areas suitable for small mammals and birds (presence of decay trees provide cavity potential) and protection from heavy snow accumulation for larger mammals within harvest areas.

- c. Reduce potential soil structure impacts through retention of trees within units.
 - d. Maintain soil water use characteristics preventing an initial increase in flow through a unit following harvest activities.
- 2. Standing Timber selectively dispersed within areas of a unit.
 - a. Address visual impacts of larger clear cut harvest areas.
 - b. Reduce potential soil structure impacts through retention of trees within units.
 - c. Maintain soil water use characteristics preventing an initial increase in flow through a unit following harvest activities.
- 3. Clear Cut areas within unit.
 - a. Addresses visual impact of harvest activities by reducing the size of clear cut areas from the entire unit to portions of the unit.
 - b. Enhance the quality and quantity of natural regeneration for the next forest rotation.
 - c. Increase the square foot leaf mass of small forbs and brush components across the area during the stand initiation phase of development following harvest.

Implementation of this concept will be affected by the natural distribution of merchantable timber and the two mechanical elements of the harvest systems deployed by a potential contractor for the sale; ground systems and cable systems. Each system of harvest creates an opportunity to apply the concept.

In a unit harvested by ground systems the objective will be achieved by focusing the harvest of timber on individual trees leaving groups distributed in a non-uniform manner across the harvest area. These groups will consist of large mature trees, small non-merchantable trees and/or groups that contain both large mature and small non-merchantable trees. The group size may range from one tree to a dozen or more. Direction from the DOF will be on distribution of what is residual and its potential for mitigating visual impacts of the mechanical system.

In a unit harvested by cable systems the harvest concept will be achieved by creating clear cut openings with individual trees potentially dispersed across the area depending on the operators' ability to selectively harvest in a cable setting. The direction from DOF will be to keep clear cut areas to small portions of a harvest unit with residual trees distributed logically according to each setting's topographic limitation. This typically is achieved with yarding corridors and lateral yarding capabilities.

In either system, the results proposed are diverse and are not restricted to a "trees per acre" count or a minimum number of small groups or a size category. The objectives of this harvest concept will be met by working with the purchaser on distribution residual trees that will be random. Success will be achieved by the economic harvest resulting in a diverse remnant stand with an emphasis on addressing the dominant public concern of visual impact of the harvest activities with other secondary benefits of uneven management.

Appendix B Supporting Information:

B2: DOF Standards

Alaska Forest Practices and Regulations.

<http://forestry.alaska.gov/forestpractices>

Forest Road and Bridge Standards.

http://forestry.alaska.gov/Assets/uploads/DNRPublic/forestry/pdfs/resources/forest_road_standard_design_20151231.pdf

http://forestry.alaska.gov/Assets/uploads/DNRPublic/forestry/pdfs/resources/forest_bridge_standard_design_20150128.pdf

B3: Required Permits

Note: None required.

Appendix C: Appeal Statutes and Regulations

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. NATURAL RESOURCES. CHAPTER 02. APPEALS.

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

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) Repealed 12/27/2012. (Eff. 9/19/2001, Register 159; am 12/27/2012, Register 204)

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

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; and

(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.

(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 29.65.050

AS 29.65.120

AS 38.04.900

AS 38.05.020	AS 38.09.110	AS 41.17.055	AS 46.15.020
AS 38.05.035	AS 38.50.160	AS 41.21.020	AS 46.17.030
AS 38.08.110	AS 41.15.020	AS 44.37.011	

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@alaska.gov

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

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

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

Appendix D: Public and Agency Comments and Responses

For the Draft Forest Land Use Plan

(December 12, 2017)

Organization	Author	Location
<i>Alaska Department of Fish and Game, Division of Habitat</i>	<i>Greg Albrecht</i>	<i>Juneau</i>
<i>NGO, Lynn Canal Conservation</i>	<i>Eric Holle, President</i>	<i>Haines</i>
<i>Public</i>	<i>Paul Slenkamp</i>	<i>Ketchikan</i>
<i>Public</i>	<i>Gerald Lapp</i>	<i>Haines</i>
<i>Public</i>	<i>Peter Lowney</i>	<i>Valdez</i>

Commenter	Comment	Response
	<i>Fish and Wildlife Habitat</i>	
Greg Albrecht ADF&G	<p>“Please report goat sightings to ADF&G and consider provisions for reducing or restricting disturbance should they be sighted.”</p> <p>“Disturbance during denning can reduce bear survival, so we recommend maintaining a 1 km buffer around any observed brown bear dens during November through April for human and bear safety.”</p> <p>“ADF&G Habitat has surveyed this area and determined no anadromous or resident fish streams are present in any of the Units.”</p> <p>“Division of Forestry cooperative fieldwork and planning and careful project layout has resulted in a timber harvest proposal with de minimis impacts to the fish and wildlife resources and habitats for which ADF&G is responsible.”</p>	Comments noted, no change required.
Eric Holle, President of Lynn Canal Conservation	<p>We oppose in principle the cutting of large tracts of old growth forest in SE Alaska and in the Baby Brown sale for the following reasons:</p> <p>1-2. (<i>See Silviculture/Harvest Methods</i>)</p> <p>3. Cutting old growth negatively impacts wildlife populations.</p> <p>4. Loss of old growth forest cover can have profound hydrological impacts to anadromous streams and rivers.</p>	The DOF coordinated timber sale development with ADF&G biologists to allow timely input from professionals with regional expertise to contribute to final sale design. Per the Forest Resources and Practices Act, due deference was provided to ADF&G to protect anadromous habitat and wildlife. No anadromous fish streams are located within the harvest units in this sale.
Peter Lowney Public	Wildlife habitat and the watershed will be damaged by clear cutting	See comment response above.
	<i>Timber Sale Support/Opposition</i>	
Paul Slenkamp Public	<p>“The FLUP is complete and should be implemented, future timber sales should incorporate fewer selective harvest areas, this will result in better regeneration.”</p> <p>“The area of the Haines State Forest designated primarily for timber harvest should be managed</p>	Comments noted, no change required.

Commenter	Comment	Response
	for that purpose. Studies show that the associated eco-system services such as habitat for fish and game can be enhanced by good forest stewardship.”	
Gerald Lapp Public	“This area is ready for harvest and should be harvested in the very near future. I ... fully support this timber sale as it is presented. This would be a much needed boost to our local economy.”	Comment noted, no change required.
	<i>Tourism</i>	
Peter Lowney Public	<p>“The timber sale will cause harm to the wild, wildlife and scenic values that attract visitors to alaskas recreation, tourism and outdoor sport industries.</p> <p>Wildlife habitat and the watershed will be damaged by clear cutting as will Alaskas wild, scenic and pristine reputation when the first thing people arriving here see is the states money losing oldgrowth clearcuts.</p>	<p>The development of this timber sale included the participation of State Agencies responsible for management of State resources including fish and wildlife, history and preservation, water quality, state land use planning/permitting, as well as the general public and industry resource professionals from fishing, tourism, recreation, and local government. Through the inclusion of these professionals and public, the DOF has prepared a timber sale that considers the concerns and recommendations presented and follow the guidance of the planning documents.</p>
	<i>Silviculture/ Harvest Methods</i>	
Eric Holle, President of Lynn Canal Conservation	<p>“The primary harvest methods will be clearcut and partial cut. We find the stated goals of providing habitat diversity, reducing the change in hydrologic flow, mitigating habitat removal for small mammals and birds, and protection from heavy snow for larger mammals to be a positive step for ADNDR Division of Forestry (DOF). However, without specific detail for each harvest unit regarding the numbers, configuration, age, etc. of timber left standing in partial cuts it is difficult to impossible to comment on the efficacy of the stated goals of retaining timber standing within and adjacent to clearcut areas. Our comments must therefore assume that the impacts</p>	<p>The harvest methods identified in the FLUP represent the projected conditions resulting from successfully leaving some trees in portions of the units while providing economic flexibility to harvest operations. The final stand composition is not set by “modeled” outcome developed based on statistical estimates for stocking.</p> <p>These objectives of harvest outlined in the FLUP are tributary to the overall requirements to meet forest resource protection as defined in the Forest Resources and Practices Act (FRPA), the BIF, the Haines State Forest Plan (HSFP)</p>

Commenter	Comment	Response
	<p>of clearcutting as a harvest method will predominate in this sale.</p> <p>We oppose in principle the cutting of large tracts of old growth forest in SE Alaska and in the Baby Brown sale for the following reasons:</p> <ol style="list-style-type: none"> 1. Cutting of old growth contributes to global warming and Alaska is already suffering from effects of climate change. 2. Cutting of old growth is unhealthy for forests because of damage to forest soils, including fungal relationships necessary for nutrient uptake and distribution. 3. (<i>see Fish and Wildlife</i>) 4. Cutting old growth makes forests susceptible to forest pests such as spruce bark beetles. Monocultures that often succeed such cutting are similarly vulnerable. 	<p>and DOF policy.</p> <p>The method of harvest, clearcut or selective, has little to do with the size of the timber sale offered and is most relevant to how best to remove the timber while addressing the protection of other forest resources.</p> <p><u>“We oppose... 1.”</u></p> <p>The DOF is directed to provide for the long term “forest” management of the timber resources on the Haines State Forest in the Alaska Constitution, FRPA, and the HSFMP. This plan will maintain productive forest land on the project area. A sustainably managed forest is a regenerative ecosystem that continues to provide numerous forest values such as carbon absorption throughout its development.</p> <p><u>“We oppose... (2, 4).”</u></p> <p>Impacts from timber harvest are managed through the implementation of Best Management Practices of the FRPA and Regulations.</p> <p>The stands identified for harvest in this sale are composed primarily of Western Hemlock. The DOF is anticipating the natural regeneration composition to return similarly in Western Hemlock. The natural state of the stand is close to a monoculture. The DOF believes the natural regeneration of that species will not adversely impact ecological forest stand dynamics. Per the requirement of the FRPA, the DOF will examine the harvest areas to determine if natural regeneration is occurring successfully over the next 5 years. If the DOF determines the stand does not meet the minimum stocking levels required by the FRPA, the DOF will likely plant seedlings to meet those requirements. Planting of these type of stands with Sitka Spruce seedlings is typical in the area to provide a</p>

Commenter	Comment	Response
		more diverse composition while meeting regeneration goals. Sitka Spruce has been used in this capacity by DOF in the past with good results.
	Visuals	
Eric Holle, President of Lynn Canal Conservation	<p>“The FLUP mentions the “. . . dominant public concern of visual impact.” LCC appreciates the efforts of DOF to reduce the visual impacts of the Baby Brown sale to approximately 64% from approximately 80%. However, given the reliance of the local economy on nature-based tourism and the value of the Haines National Scenic Byway, we suggest that more effort should be undertaken to further reduce visual impacts. In addition, we are more concerned about the unseen impacts of sales of this nature than the visual impacts.”</p>	<p>During the scoping and development process of this sale visibility concerns specifically from the geographic perspective of travelers along the Haines Highway were acknowledged as an issue. The DOF addressed this concern during the preparation of unit design and harvest road location. Reduction in potential visibility of final harvest areas and roads in this FLUP have occurred to the extent feasible.</p> <p>Visibility of harvest activities associated with this sale were considered according to the Haines State Forest Management Plan (HSFMP), Forest Resources and Practices Act (FRPA) which is the state law governing timber sales, and during the final design of the harvest units and roads to best minimize the visibility from viewpoints along the Haines highway.</p>
	Economics	
Eric Holle, President of Lynn Canal Conservation	<p>We oppose in principle the cutting of large tracts of old growth forest in SE Alaska and in the Baby Brown sale for the following reasons:</p> <p>1-5. (See <i>Fish and Wildlife or Silviculture/ Timber Harvest Methods</i>)</p> <p>6. State timber sales in Southeast Alaska are a drain on the economic vitality of the State of Alaska.</p> <p>7. Industrial scale timber sales by clearcutting and similar methods do very little to support local timber operators and in the long term reduce the available supply of timber for value-added forest products.”</p>	<p>Timber sale economics and size have been addressed previously by the DOF and in the DNR Commissioners response to LCC appeal of the BIF.</p>

Commenter	Comment	Response
<p>Peter Lowney Public</p>	<p>The money generated from the sale (original bid ~275,000) does not seem to come even close to the costs of administering the life of sale and improvements and restoration much less bringing any gain to the state.</p> <p>With the bankruptcy of the state budget I dont know if your department is in any position to guarantee any level of enforcement of the terms and conditions of the clearcutting.</p>	<p>The DOF supports the management of the Haines State Forest through timber sale revenue throughout the state and funding provided by the State Legislature. The economics of the sale were determined to be in the best interest of the state during the initial review of the proposed harvest and subsequently approved by the Commissioner.</p> <p>Sale Administration</p> <p>The DOF currently has a staffed office located in Haines capable of administering the sale from that location.</p>
	<p><i>Public Notice and Input</i></p>	
<p>Peter Lowney Public</p>	<p>I also ask that the comment period be extended for at least an additional 30 days and that more public meetings be held to provide more opportunities for public comments.”</p>	<p>The timber sale process used by DOF is designed to discover facts, issues and provide input to the State’s decision. Based on the accumulated knowledge, the DOF believes it has developed an appropriate plan. The public process, including meetings, began for this timber sale with the development of the Haines State Forest Management Plan which identified this area as primarily used for timber resource extraction. Additional public comment opportunities included the revision of the plan in 2002 and Five Year Schedules of Timber Sales produced every two years, the Best Interest Finding, and this FLUP. The public notice for these documents complied with AS 38.05.945.</p>