

**STATE OF ALASKA  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF FORESTRY**



**SOUTHERN SOUTHEAST AREA FORESTRY**

**FINAL BEST INTEREST FINDING AND  
DECISION FOR  
COFFMAN COVE TIMBER SALE  
SSE-1336-K**

**AUGUST 31, 2016**

## Abbreviations

|                  |  |
|------------------|--|
| <b>ADEC</b>      | <b>Alaska Department of Environmental Conservation</b> |
| <b>ADF&amp;G</b> | <b>Alaska Department of Fish and Game</b>              |
| <b>ADNR</b>      | <b>Alaska Department of Natural Resources</b>          |
| <b>BIF</b>       | <b>Best interest finding</b>                           |
| <b>DMLW</b>      | <b>Division of Mining, Land and Water</b>              |
| <b>DOF</b>       | <b>Division of Forestry</b>                            |
| <b>FLUP</b>      | <b>Forest Land Use Plan</b>                            |
| <b>FRPA</b>      | <b>Alaska Forest Resources and Practices Act</b>       |
| <b>FYSTS</b>     | <b>Five-year Schedule of Timber Sales</b>              |
| <b>MBF</b>       | <b>Thousand board feet</b>                             |
| <b>POG</b>       | <b>Productive old growth</b>                           |
| <b>POW</b>       | <b>Prince of Wales</b>                                 |
| <b>POWIAP</b>    | <b>Prince of Wales Island Area Plan</b>                |
| <b>ROW</b>       | <b>Right-of-way</b>                                    |
| <b>SESF</b>      | <b>Southeast State Forest</b>                          |
| <b>SESFMP</b>    | <b>Southeast State Forest Management Plan</b>          |
| <b>SHPO</b>      | <b>State Historic Preservation Office</b>              |
| <b>UA</b>        | <b>University of Alaska</b>                            |
| <b>USFS</b>      | <b>United State Forest Service</b>                     |

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## **I. PROPOSED ACTION**

The Division of Forestry (DOF) is proposing to offer for sale approximately 492 acres of mature old growth composed of western hemlock, Sitka spruce, western red cedar and yellow cedar from state lands on Prince of Wales (POW) Island, approximately one-mile south of the City of Coffman Cove (see Appendix 1A, Timber Sale Area Map). The volume to be offered totals approximately 8,640 thousand board feet (MBF). The DOF proposes to sell the commercial timber in several different negotiated sales under provisions of AS 38.05.115, AS 38.05.118 and/or AS 38.05.123. The sales will be noticed as required by sale type authority and AS 38.05.945 prior to being sold.

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, and
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.

## **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-1336-K.

## **IV. SCOPE OF DECISION**

This final best interest finding (BIF) completes part three of a six-part process to design, sell, and administer timber sales. This BIF covers the sale of approximately 492 acres of mature old growth forest composed of western hemlock, Sitka spruce, western red cedar and yellow cedar on state land within the perimeter of the 4,932-acre project area (see Appendix A1, Timber Sale

Area Map and Appendix A2, Land Use 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 sales. Subsequent land use decisions must be consistent with the area or forest plans. The area in this BIF is covered by the Coffman Cove Subunit in the Prince of Wales Island Area Plan (POWIAP) and the Coffman Cove unit in the Southeast State Forest Management Plan (SESFMP). The majority of the area is also within the boundary of the City of Coffman Cove.

**Part 2: Five-year Schedule of Timber Sales (AS 38.05.113).** The Southern Southeast Area Offices 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 Five-year Schedules 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 Forest Land Use Plan. Under AS 38.05.113, proposed timber sales within the area covered by this BIF must appear in at least one of the two Five-year Schedules preceding the sale. The sale area was within 2013-2017 and 2015-2019 Five Year Schedules of Timber Sales.<sup>1</sup>

**Part 3: Best Interest Finding.** 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,
- 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 1,045 acres of old growth and 583 acres of mature young growth in the project area in negotiated commercial sales on December 11, 2014. DOF considered all written comments received during the review period, and revised the BIF where appropriate. Responses to the comments are listed in Appendix D.

The DOF removed the second growth harvest from the final BIF based on the current low piece size and overall volume per acre of the timber. Projected market conditions indicated low utilization of stems at this time. Second growth that did exhibit higher volumes was observed mainly

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<sup>1</sup> 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.

on the General Use lands in vicinity of the Coffman Cove drinking water source in Section 1; that volume was removed because of immediate proximity to the withdrawal point as well as piece size.

The old growth originally identified in this proposed sale was done in a blanket manner to facilitate the development of relevant issues that might affect its operability over time. The identified timber volume has subsequently been reduced for reasons in the final BIF based that can be summarized as:

- Retention for riparian and wildlife leave areas.
- Current operating economics relative to stand volumes.
- Better typing of the stands that revealed some of the old growth was actually composed to a greater extent of second growth than old growth.
- A management decision to not harvest at this time within the Coffman Cove drinking water supply watershed.

This document is the final BIF for the Coffman Cove Sale. A person affected by the final decision who provided timely written comment or public hearing testimony on the preliminary decision may ask for reconsideration from the ADNR Commissioner in accordance with 11 AAC 02.

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 FLUPs for harvest areas within the overall sale area covered by this best interest finding. FLUPs specify the site, size, timing, and harvest methods for harvest units within the sale area. FLUPs also address site-specific requirements for access construction and maintenance, reforestation, and multiple use management. Draft FLUPs will be based on additional field work and site-specific analyses by the DOF. Appropriate regulatory agencies and the City of Coffman Cove will be consulted and the plan is subject to public review. The timber sale FLUPs will consider the cumulative impacts in the project area as each sale is designed and sold. The DOF estimates that it will notice the first FLUP for the planning unit in the fall of 2016.

Part 5: Timber Sales and Contracts. Following adoption of the final BIF, and completion of the FLUPs, DOF offers the timber for sale by either auctioning competitive sales and/or negotiating some sales with purchasers. The Division will sign a contract with the winning bidder for each sale. The contract will include stipulations to ensure compliance with the best interest finding, 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 areas are located within Sections 1, 2, 3, 4, 9, 10, 11, of T68S, R81E and in Section 7 of T68S, R82E, Copper River Meridian. The sale area is found within the Petersburg A-3 and Craig D-3 USGS quadrangles. See attached map titled Appendix A1 SSE-1336-K Coffman Cove Timber Sale Area Map and Appendix A2 SSE-1336-K Coffman Cove Land Use Map.

### **B. Title status**

The sale area lands were granted to the State through National Forest Community Grants 230, 345 and 386.

### **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 Coffman Cove Subunit 6A in the POWIAP and the Coffman Cove unit in the Southeast State Forest Management Plan. The classification of most of the area outside of the State Forest is General Use under the POWIAP. The south half of Section 2 is classified Settlement. See p. 15, Future Residential Subdivisions, for a discussion of the units in this Section 2. The specific management intent for the remainder of the area follows:

#### **COFFMAN COVE SUBUNIT 6A MANAGEMENT INTENT AND GUIDELINES**

“State lands in this subunit will be managed for multiple use, with an emphasis on meeting the needs of the developing community of Coffman Cove for community expansion and to support the economic base of this community through use of the commercial forest resources.”

#### **FISH AND WILDLIFE**

“The uplands adjacent to the main roads are used for deer hunting, but are not designated because they do not meet the criteria for intensive community harvest. Impacts on non-designated community harvest areas should be considered when authorizing activities.”

#### **FORESTRY**

“State uplands designated “Gu” (General Use) are considered appropriate for timber harvest, subject to design buffer separations between areas of timber harvest and areas designated for residential development, the requirements of Chapter 2, and view shed considerations. Uplands designated “S” (Settlement) may also be appropriate for timber harvest subject to the requirements of this plan (Chapter 2) and must be coordinated with adjacent land use development.”

With the exception of Section 10 and the south half of Section 2, all of the proposed harvest area is within the legislatively designated Southeast State Forest (SESF). The primary pur-

pose 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 access for this sale area is through Alaska Highway System Coffman Cove, Alaska Route 7, and the adjoining United State Forest Service (USFS) forest system roads 3030300, 3030500 and 3030650. All of the units proposed are within one-half mile of existing roads. It is likely that the area experiences incidental use by the public for a variety of uses related to semi-remote recreation such as but not limited to berry picking and hunting.

The adjacent public landowners including the University of Alaska (UA), the United States Forest Service and City of Coffman Cove have conducted timber harvest operations at various times on their lands since the mid 1940's. An old USFS log transfer site and log storage area exists in the middle of town, but has not been used in a number of years.

Adjacent private lands are being developed for residential and small scale commercial use north of the timber sale area in the City of Coffman Cove. Land adjacent to the north side of the State Forest in Section 2 is in the process of survey and subdivision by the Division of Mining, Land and Water (DMLW) in preparation for eventual disposal as residential lots. The UA has subdivided and sold portions of their holding adjacent to the core area of the city as well.

The DMLW and the UA have also subdivided land adjacent to the city core and disposed of it in a series of land offerings over several decades. The DMLW is currently considering disposing of residential lots in Section 2.

#### **E. Background and description of proposal**

##### **1. Background:**

The State seeks to use State Forest land on Prince of Wales to encourage sustainable development of the State's forest resources, making timber available for sale and harvest. The demand for State timber is significant at this time due to the uncertainty of the federal timber supply and the diminished activity on Native corporation lands. The majori-



ty of the State Forest land base in southeast Alaska is remote. The Coffman unit is on the existing road system and offers forest resource values close to the remaining mills and processing facilities and a skilled work force.

A diversified economy 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.

## 2. Timber Volume and Sustained Yield:

The total estimated sawlog volume identified in the sale area is 8,640 MBF on 492 acres based on a timber cruise of the units marked in the field using the Atterbury Cruise System.

The Division of Forestry is required to manage its timber harvest 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 11.2 MMBF per year for the Southern Southeast Area. The location of the project and the configuration of the timber units, will allow the DOF to meter the volume offered for sale without exceeding the annual allowable cut. Timber sales that are sold will be within the allowable cut and 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.

## 3. Harvest Unit Design:

All harvest sale area units will be designed for clear-cut harvest using conventional shovel logging and high lead cable yarding methods.

- a. Reforestation and Site Preparation: The sale area will be reforested in compliance with the Forest Resources and Practices regulations (11 AAC 95.375-.390).

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. Scarification will disturb the vegetative mat and in turn provide a more receptive seed bed for spruce. Western hemlock and western red cedar will likely be major components of the regenerated stand as well since they are currently on the sites. Alaska yellow cedar is less than four

percent of the current stand. It is predicted that it will repopulate in the same general area at a slightly lower rate due to the vigorous growth that is typically exhibited by western red cedar and hemlock when the lower volume sites are disturbed.

The DOF will conduct post-harvest reforestation inspection of the area to ensure the stocking meets FRPA requirements for regeneration.

- b. Road Access - Design and Construction: Road access design, construction, and maintenance will comply with the Forest Resources and Practices regulations (11 AAC 95.285-.355).

No streams containing fish will be crossed by proposed roads within the sale area.

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).

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 in the area and are located on flat or moderate slopes. Cable and shovel logging landings will be chosen to manage and minimize the concentration of water and movement of soil. The Division of Forestry will require full or partial suspension for any cable logging that occurs in the harvest units and ground based mechanical yarding will be suspended in times of saturated soil conditions. 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.

The DOF will consider leaving some of the roads constructed for temporary vehicle access of residual logs for firewood by the public after the harvest operations. This will be done where doing so will not compromise obligations to keep the road maintained for the preservation of soil and water quality. Spur roads constructed in this sale will generally be closed after harvest of timber to meet FRPA requirements and minimize dumping of garbage and other unauthorized activities. This may be modified in the future as community needs are heard and addressed. Future budget constraints may require a more aggressive road storage or closure plan.

- c. Appraisal Method: 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 numbers are obtained from industry sources, the United States Forest Service, and previous operations.

## **F. Resources and management**

### **1. Timber**

#### **a. Timber Stand Composition and Structure:**

The proposed harvest area has the characteristics of mature old growth and occasional commercial second growth. The stands are dominated by a red cedar based stand type. The timber identified is generally short. Both old growth and second growth are composed of western red cedar, western hemlock, Sitka spruce and occasional yellow cedar. The second growth remaining in the identified harvest units is generally at the edges of the units and incidental to the old growth harvest.

#### **b. Stand Silvics:**

Second growth forests adjacent to the proposed harvest area exhibit indications of productive site conditions and are between 15 and 60 years old. Where precommercially thinned, they are approaching merchantable size characteristics. The sites targeted in this BIF generally are residual stands that did not have the species composition for historical market conditions or were operationally isolated due to the type of harvesting methods employed. Some of the bordering areas have evidence of selective harvest mixed with occasional blow down.

The DOF intends to reforest promptly as well as encourage the size of commercial timber species given the objectives of the land management designation on the parcel. 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. Natural reforestation will occur and DOF will verify that it meets FRPA standards. It is anticipated that some precommercial thinning will be done on the regenerating stand to shape the future production of merchantable products (typically sawlogs) when it reaches the stem exclusion stage at approximately 30 years of age.

#### **c. 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 of gradual hills with varied topography ranging from gentle to moderate slopes; aspect varies throughout the sale area. Elevation ranges from 0 to 600 feet within the sale area. The majority of the sale area has slopes of less than 35 percent. Soils characteristics range from well drained to muskeg soil type.

2. Agriculture.

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

3. Wildlife habitat and harvest.

This sale has been designed using guidelines and management intent from the Prince of Wales Island Area Plan (POWIAP), the Alaska Forest Resources and Practices Act and Regulations (FRPA), and the SESFMP. The sale area was not identified as crucial habitat (Ha) or prime habitat (Hb) in the POWIAP.

POW has a total area of approximately 2,577 square miles. The amount of land harvested by the Coffman Cove timber sale is small in comparison to the size of POW (0.04%). The majority 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 areas of concern were identified by ADF&G in the comments received for the 2013-2017 or 2015-2019 FYSTSs. The ADF&G Division of Wildlife Conservation (ADF&G-DWC) did note a historically documented wolf den in the eastern block of the Coffman management unit in the SESFMP. Further discussion with ADF&G-DWC refined this location to be actually near the western block of the Coffman management unit located on USFS land.

ADF&G-DWC visited the sale area on July 20, 2016 with DOF staff. Observations indicated no (wolf) denning was actively occurring in the sale area. Evidence of wolf activity was noted in several locations but did not appear to be recent or associated with a den use pattern. Consequently, no specific reservation of habitat or timing of activity was recommended for the wolves using the area.

Deer activity was moderate and was typical for a medium to low volume stand dominated with red cedar. Use patterns were generally topography driven as well as associated with timber types that had less cedar content. A reduction in deer habitat in the immediate area is anticipated by the harvest of this timber as the stand regenerates and understory diminishes during mid-term regeneration, consequently the harvest of timber will eventually lower the capacity of the immediate area for deer during this period. The resulting change in availability of deer for wolf predation on POW is minor and may be more noticeable for humans as the area regenerates to a second growth forest thus diminishing browse and human access.

There will be no harvest within 100 feet on either side of anadromous water bodies per the FRPA. Harvest within 100 to 300 feet of these water bodies has been left

where terrain lends itself to the maintenance of important fish and wildlife habitat. These buffers also function as wildlife movement corridors. These retention areas are generally in excess of 400 feet total width adjacent to the harvest units. Observation indicates this undisturbed corridor will generally be wind firm and provide travel corridors for wildlife movement.

Hunting and trapping does occur in the area. It is likely that human interaction with wildlife may occur at a slightly higher level than other areas on POW due to the area's proximity to the paved road and Coffman Cove. The spur roads associated with the timber harvest will provide some additional access for human activities. Most of the road construction is less than one-quarter mile in length and will not access significant amounts of currently inaccessible land. Added hunting pressure is not anticipated to be significant due to the proximity of a road network elsewhere on POW.

The DOF used available federal information on bald eagle nest locations and field observations during design to ascertain and avoid active nest sites. The location of the timber sale area is generally removed from the coastal area preferred by the bald eagle. No nests were observed or documented in the process of designing the timber sale.

The sale is not expected to cause significant adverse impacts overall to the wildlife populations on POW based on area planning, site specific observations, and project methods proposed.

4. Fish Habitat, Water Resources, and Water Quality. The proposed sale will be 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).

The following streams are the only cataloged anadromous water bodies within the timber sale area: 106-30-10120, 106-30-10150, 103-60-10160, 106-30-10670-2004-3017 and 106-30-10670-2004-0020. No other anadromous or high value resident streams were identified adjacent to or within the sale area during layout of the sale.

There will be no harvest within 100 feet on each side of these anadromous water bodies and harvest within 100 to 300 feet of these water bodies will only occur if it consistent with the maintenance of important fish and wildlife habitat. In addition to providing the retention areas along these anadromous water bodies, FRPA will be implemented to maintain bank and soil stability and water quality in streams.

As required by AS 41.17.098, DOF afforded due deference to ADF&G in regard to habitat mitigation to ensure all fish and wildlife habitat issues are addressed by the proposed timber sale design. DOF provided due deference to the Alaska Department of Environmental Conservation (ADEC) for all water quality issues. ADF&G-Habitat visited the anadromous streams adjacent to the proposed units in November of 2014 to specifically look at the proposed units and the adequacy of the retention

areas. “Based on topography these no harvest areas should maintain the water bodies as well as wildlife travel habitat” (ADF&G-Habitat, 12/30/2014).

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, etc.) from stream channels as required. The varied gradient of the streams and moderate topography of the sale area will aid in the control and settlement of incidental turbidity generated by the operations (e.g., from culvert installation and removal).

Due to the location and design of the units and roads, and the topography around significant surface water bodies, the timber sale is anticipated to avoid significant adverse impacts on water quality.

## 5. Public Water Supply

The City of Coffman Cove’s (City) drinking water intake is located on State land in the NW 1/4 of Section 1. The intake is located on Chum (Dog) Creek which is an anadromous fish stream (106-30-10120).

The quarter section of land containing the water intake is classified as general use land in State land records. The middle reaches of the watershed are legislatively designated State Forest. The referenced roads (FDR 3030300 and FDR 3030400) and the upper south end of the watershed are USFS reserved easements and land.

The ADNR granted the City of Coffman Cove a water right for a public water source on 8/10/1993 (LAS 14419). To access the water source, the City of Coffman Cove was granted an easement on 4/10/2014 (ADL 106546) by ADNR. The water right and access easement reserved does not preclude the public from access of lands or waters or the State from utilizing surface resources.

The area is posted but unsecured. The City has categorically claimed a restriction of commercial use associated with timber harvest in the area and on the roads in the watershed (Title VIII, Chapter 8.04).

Per AS 41.17 and 11 AAC 95.185 (FRPA) forest operations “shall be conducted in a manner that does not cause or constitute a substantial factor in causing a degradation of water quality.” The need to maintain public trust also leads the DOF to not propose activities in the watershed that in its judgement or under advisement from the ADEC would pose a significant chance of affecting water quality or quantity per the Alaska Water Quality Standards, specifically the Anti-degradation Policy (18 AAC 70.015). Furthermore, the Source Water Protection Requirements (18 AAC 80.015) of the Alaska Drinking Water Regulations (18 AAC 80) protect the intake and the adjacent area but not the entire watershed. Within this designated area, activities are required to take reasonable efforts to avoid degrading water quality.

The DOF consulted with the City and ADEC during the design of the timber sale regarding the location and vulnerability of the water source to forest operations. The watershed area contributing to the City's water intake was identified by the DOF through topographical delineation and refined through the use of the ADEC's inventoried Drinking Water Protection Area database.

The City's code and general resistance to commercial activity in the watershed has led the DOF to remove all of the originally proposed timber harvest on general use and settlement land adjacent to the water intake in Section 1 as well as several small old growth units located in the Southeast State Forest on the upper southwest side of the watershed.

Two proposed units are located east of the watershed (they drain away from the watershed) but have been designed with short spurs to be constructed connecting to the 3030300 Road. The 3030300 Road is in good condition with functioning drainage structures. Rock required for the spurs will be imported for construction; no pits will be developed within the watershed. No activity is proposed down-gradient of the roads in relation to the Chum (Dog) Creek. The nearest distance between proposed operations (trucks hauling timber or rock) and the intake structure is approximately 250 feet at the intersection of Route 7 (the paved road) and the 3030300 Road. The area is well vegetated and will not be disturbed. The nearest harvesting operations are over one-half mile from the intake structure and outside of the watershed.

The DOF has eliminated the harvest of timber in the watershed during this stand entry. It has further sought to avoid hauling in the watershed where economically practical. During operations it will mitigate impacts by use of the following requirement in the timber contract:

- Inspection and documentation of all machinery operating in the drainage on a daily basis for leaks and mechanical issues that might compromise the integrity of the machine to operate in an environmentally safe manner. Machinery leaking fluid will not be allowed in the watershed.
- Require adequate hazardous and fluid spill response materials, planning and training.
- Provide oversight for the timing of hauling relative to extreme weather conditions to minimize surface runoff.
- Require all rock sources be preapproved prior to placement in the watershed for any maintenance activity or construction of access spurs.
- Require adequate waste procedures and facilities are in place for personnel.

#### 6. Recreation, Tourism, and Scenic Resources.

Recreation in this part of the 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. The access to known fresh water fishing areas will not change.

Road access may provide diversity of hunting access but relative to the overall availability on POW it will be minor. All of the proposed roads are less than one-half mile long with most less than a quarter mile. The majority of the roads constructed will be water barred at the conclusion of the timber sale in a manner that will limit most highway vehicle use. ATV traffic will not be actively managed. Typically, unless cleared of alder by incidental users the road beds will not be drivable by ATVs inside of fifteen years.

Due to topography and the location of the timber sale it will not be visible to the core area of the City of Coffman Cove. The units will be partially visible from the State Highway Route 7 that accesses the community from the west and several will be visible from the Beach Road. The level of visual change is in keeping with past timber sales harvested in the area and is a smaller footprint than past area harvests. Several of the smaller units will be visible from Clarence Strait and Kashevarof Passage.

As the result of further research of the Etohin View Subdivision done by the University of Alaska, the DOF has dropped nine acres of harvest on State Forest land below the Sandy Beach Road (USFS 3030000) from the timber sale configuration. This was done out of request of the subdivision owners for a wind break and the previous erroneously portrayed use of the area by the UA Land Management Office (public use).

## **7. Cultural Resources.**

The DOF works with the State Historic Preservation Office (SHPO) to identify and avoid known cultural, historic or prehistoric sites in planning the proposed access routes and harvest areas.

Based on SHPO's initial review the DOF enlisted the assistance of the USFS Archeologist for the Tongass National Forest due to their familiarity with the area. The USFS conducted a field review of the timber sale area and summarized its observations in a July 17, 2009 Heritage Resource Report titled "Coffman Cove State Sale Archaeological Survey Report R2008100551009" by Shona Pierce, Archeologist for the United States Forest Service. In that report it stated, "No cultural resources were located in the area of potential effects. Clearance is recommended for the proposed project based on the absence of historic properties within the area of potential effects."

Subsequent to the Coffman Cove Preliminary Best Interest Finding but during the commenting period of the 2015-2019 Five Year Schedule of Timber Sales, the Office of History and Archaeology noted that portions of the western half of Section 9, Township 68 South, R 81 East Copper River Meridian had not been surveyed for cultural resources. Based on this observation they were "likely" to request further survey of that specific area based on the low elevation and proximity to Sweetwater Lake. The survey of this area has been scheduled for the fall of 2016. The results of that survey will guide the site specific configuration represented later in the FLUP.



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

8. 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.

9. Future Residential Subdivisions.

The DMLW has proposed to subdivide portions of Section 2, T68S, R81E, CRM and has titled that project the Coffman Loop Subdivision (ADL 108055). The action has not been finalized and is pending development of lot design and survey. The decision to subdivide and dispose of the land classified as Settlement is independent of the decision to sell timber. The DOF has requested that subdivision design provide for a public easement from Route 7 through the subdivision that would benefit the State Forest to the south in Section 11. The intent is to develop the least amount of road by choosing a location that accommodates likely future use. Most of the State Forest to the south of proposed subdivision is second growth timber. Several patches of mixed age timber have been identified in this area as well; they total approximately 30 acres in size. In the event that the DMLW finalizes the right-of-way (ROW) location as part of their current subdivision action, the DOF believes it is in the best interest of the State to develop the ROW leading to the State Forest and will harvest the above referenced mixed age timber in Section 11. The development of the ROW is in keeping with the intent of the subdivision as well as the State Forest. The DOF plans to close the road upon completion of harvesting on State Forest land and will consult with the DMLW on whether the road should be closed elsewhere in the Subdivision area.

**G. Costs and benefits**

Based on the timber cruise and current markets, timber revenue is projected to cover administration, access and operating costs for this sale area and provide stumpage royalty to the State. Timber sales have traditionally created economic benefits to the communities of Southeast Alaska. The business communities will receive direct economic benefits by providing support services for the operators such as fuel, food, housing, medical and miscellaneous supplies. The residents of the communities in Southeast Alaska will receive a direct benefit through employment opportunities and wages paid by the operator during the course of the timber harvest and milling operations.

## **VI. PUBLIC NOTICE**

DOF issued a Preliminary BIF covering the decision to sell approximately 1,628 acres of old growth and mature young growth in the project area in negotiated commercial sales. The final footprint and actions proposed in this decision are within and inclusive of the timber noticed in the original preliminary best interest finding. The preliminary best interest finding and decision were publicly noticed in compliance with AS 38.05.945. Notice was posted on the Alaska Online Public Notice System on December 19, 2014, and again on December 23, 2014. Notices were also posted at the Ketchikan, Craig, Wrangell and Petersburg Public Libraries. Mailed notices were distributed to a mailing list maintained by the Southern Southeast Area Office and public notices were sent to the post offices of Ketchikan, Ward Cove, Craig, Klawock, Thorne Bay, Coffman Cove, Naukati, Edna Bay, Metlakatla, Wrangell and Petersburg. A legal notice is also provided in the Ketchikan Daily News on December 17 and 24, 2014, Wrangell Sentinel and Petersburg Pilot on December 18 and 25 and well as the Island News the same week. The comment period initially ended on January 9, 2015 and was subsequently extended to February 20, 2015 to meet all requirements of AS 38.05.945.

## **VII. PUBLIC COMMENT AND RESPONSE**

DOF received comments from 10 organizations and five individuals (see Appendix D).

**VIII. DISCUSSION AND FINAL FINDING AND DECISION**

The proposed sale meets the objectives of the Five-Year Schedule of Timber Sales and ADNR's constitutional mandate, provides royalties to the State, meets the silviculture objective of improving forest vigor, and creates additional jobs in Southeast Alaska due to the combination of road building, logging, trucking, and milling.

After due consideration of all pertinent information, the ADNR has reached the following decision: To offer for sale approximately 492 acres of mature old growth. No second growth will be harvested at this time. Public notice has been accomplished in accordance with AS 38.05.945. The case file has been found to be complete and the requirements of all applicable statutes have been satisfied. 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 of 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**



Andrew T. Mack  
Commissioner, Alaska Department of Natural Resources

5/31/2016  
Date

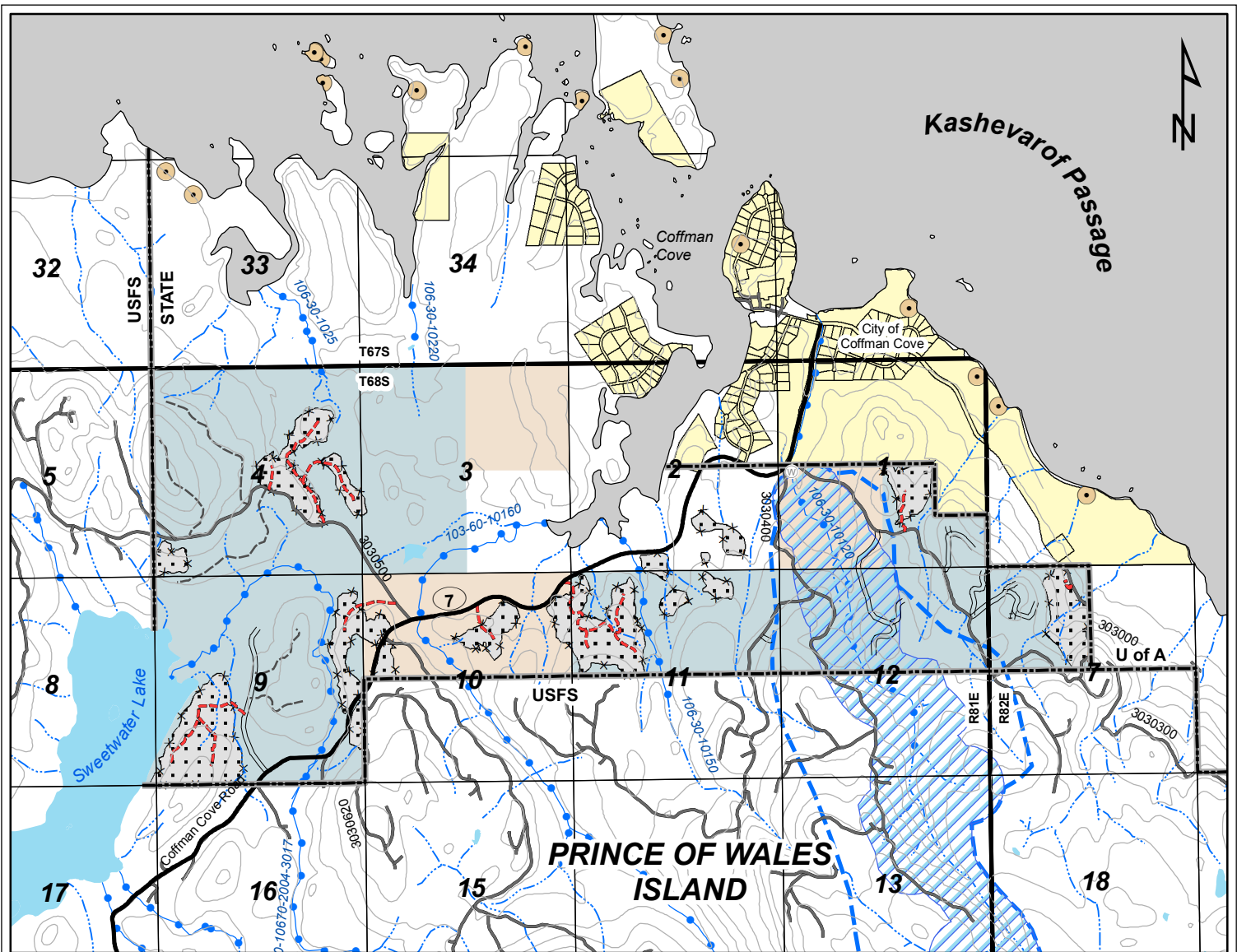
## **X. APPEALS FOR RECONSIDERATION**

A person affected by this decision who provided timely written comment or public hearing testimony on the preliminary decision may request reconsideration in accordance with 11 AAC 02. Any reconsideration must be received by **September 20, 2016** and may be mailed or delivered to Andrew T. 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](mailto:dnr.appeals@alaska.gov). If reconsideration is not requested by that date, this decision goes into effect as a final order and decision on **September 30, 2016**. Failure of the commissioner to act on a request for reconsideration within 30 days after issuance of this decision is a denial of reconsideration and is a final administrative order and decision for purposes of an appeal to Superior Court. The decision may then be appealed to Superior Court within a further 30 days in accordance with the rules of the court, and to the extent permitted by applicable law. An eligible person must first request reconsideration of this decision in accordance with 11 AAC 02 before appealing this decision to Superior Court. 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](mailto:greg.staunton@alaska.gov).

**XI. APPENDICES**

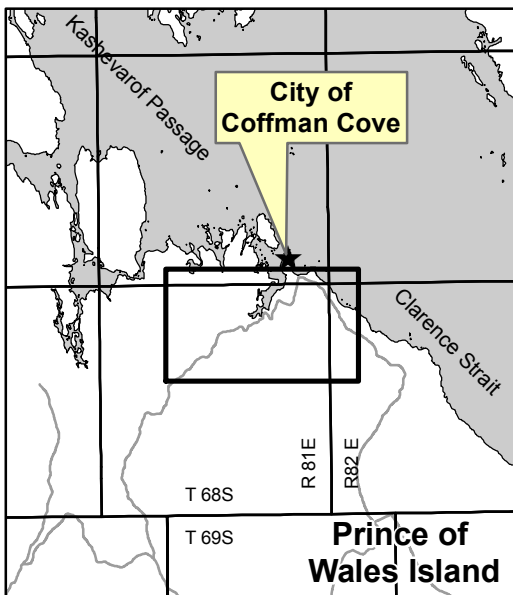
|                    |  |
|--------------------|--|
| <b>Appendix A1</b> | SSE-1336-K Coffman Cove Timber Sale Area Map             |
| <b>Appendix A2</b> | SSE-1336-K Coffman Cove Land Use Map                     |
| <b>Appendix B</b>  | References   |
| <b>Appendix C</b>  | Appeal and Request for Reconsideration Regulations       |
| <b>Appendix D</b>  | SSE-1336-K Coffman Cove Timber Sale Comments & Responses |



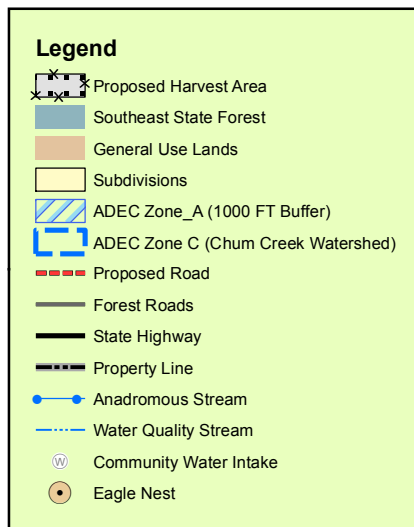
0 2,000 4,000 6,000 8,000 Feet  
 1 inch = 4,000 feet

C.R.M.

Contour Interval = 100 feet



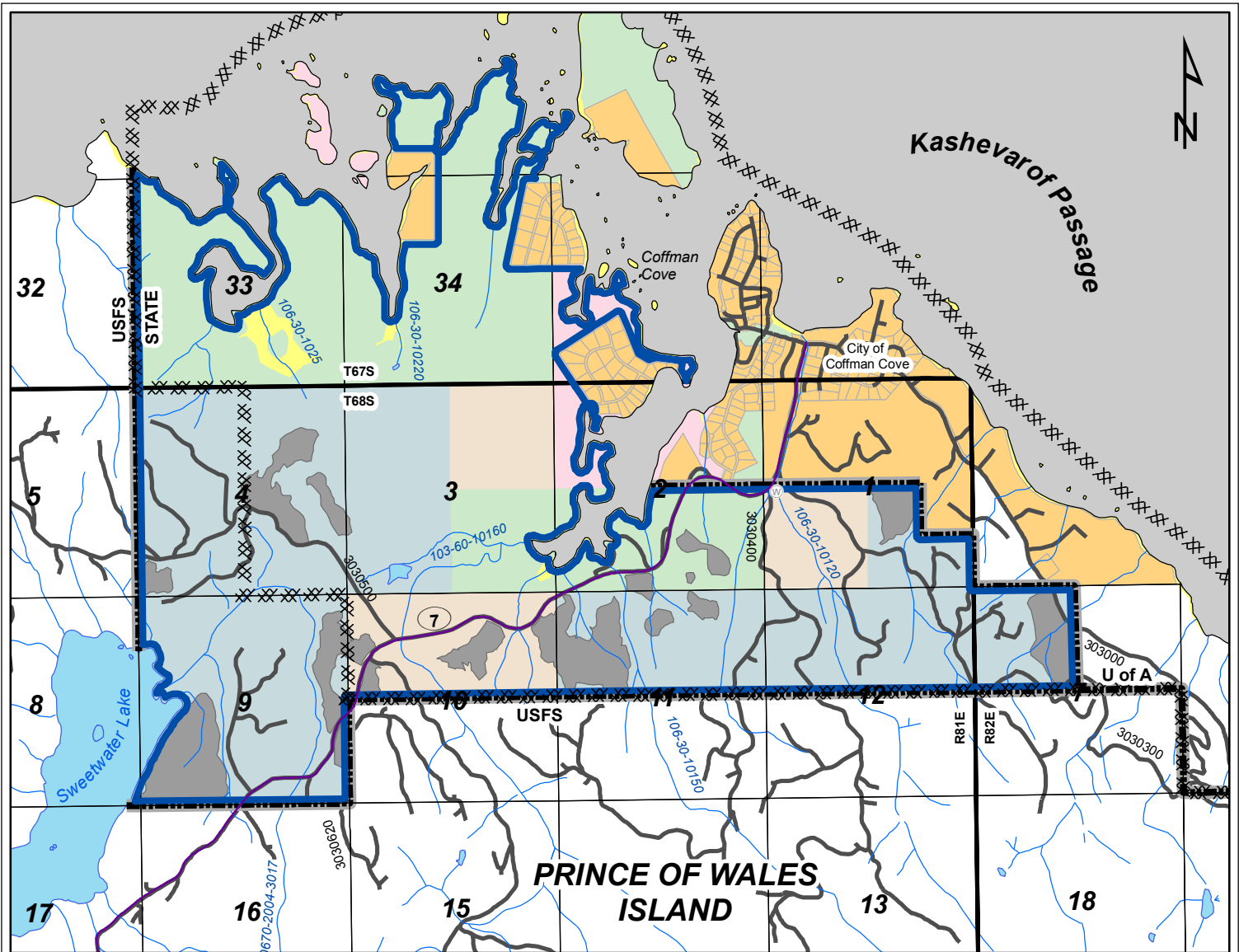
**Vicinity Map**  
 1 inch = 5 miles



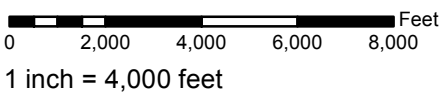
# APPENDIX A1 SSE-1336K COFFMAN COVE TIMBER SALE, AREA MAP



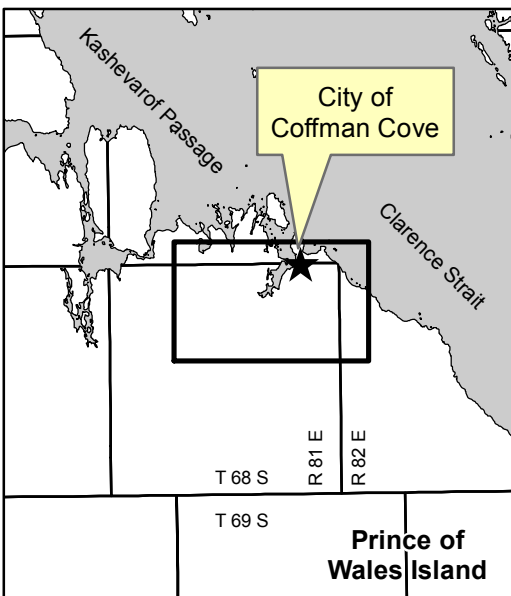
**DIVISION OF FORESTRY**



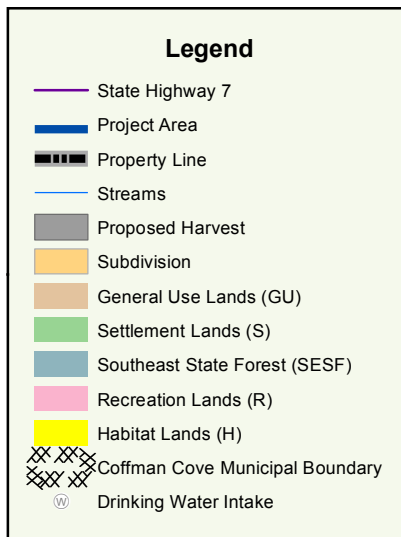
C.R.M.



# APPENDIX A2 SSE-1336K COFFMAN COVE LAND USE MAP



Vicinity Map



DIVISION OF FORESTRY

Date: 8/11/2016 GS

## Appendix B References

Alaska Department of Natural Resources, Division of Forestry, Annual Board and Agency Reports on the effectiveness of the Alaska Forest Resources and Practices Act and regulations. Reports retrievable from: <http://forestry.alaska.gov/alaskaboardforestry.htm>

Alaska Department of Natural Resources, Division of Forestry, *Southeast State Forest Management Plan*, Adopted February 29, 2016. Maps and general information retrievable from: <http://forestry.alaska.gov/stateforests.htm>

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Edwardson, Robert, S.E.R. Manager, Alaska Department of Natural Resources, Division of Mining, Land and Water, personal communication 2013-2016.

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Pierce, Shona, Archaeologist United State Forest Service, *Coffman Cove State Sale Archaeology Survey Report R2008100551009*, Heritage Resource Report July 17, 2009.

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United States Forest Service, Region 10, Engineering Cost Guide. February 24, 2014.

United States Forest Service Geographic Information System Database 2010.

United States Forest Service, Tongass Land Management Plan Amendment, Final E.I.S., June 2016.

United States Forest Service, Big Thorne Project, Final E.I.S. and supplemental documents, ROD June, 2013.

**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. 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) 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 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 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 |              |

**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](mailto: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 29.65.120  
AS 38.05.035  
AS 38.50.160  
AS 41.21.020  
AS 03.10.020  
AS 29.65.050  
AS 38.04.900  
AS 38.05.020  
AS 38.08.110  
AS 38.09.110  
AS 41.15.020  
AS 41.17.055  
AS 46.15.020  
AS 46.17.030

**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



**Appendix D**

**SSE-1336-K, Coffman Cove Timber Sale  
Comments & Responses**

Department of Natural Resources, Division of Forestry  
January 2015

The following comments were received during the public comment period on the Coffman Cove Timber Sale.

| <b>Organization</b>   | <b>Author</b>                                | <b>Location</b>      |
|---|--|----------------------|
| Office of History and Archaeology                               | Judith E. Bittner                            | Anchorage, Alaska    |
| City of Thome Bay   | Wayne Benner                                 | Thome Bay, Alaska    |
| Papac Alaska Logging Inc.                                       | Kate Lankford                                | Craig, Alaska        |
| Private   | Kathleen Yarr                                | Unknown              |
| Ketchikan Alaska Chamber of Commerce                            | Chelsea J. Goucher                           | Ketchikan, Alaska    |
| Private   | Chere Klein                                  | Ketchikan, Alaska    |
| Private   | Ghert V. Abbott                              | Ketchikan, Alaska    |
| Private   | Richard Hauver                               | Unknown              |
| Sitka Conservation Society                                      | Luke A' Bear, Andrew Thoms                   | Sitka, Alaska        |
| Cascadia Wildlands, Greenpeace, Center for Biological Diversity | Gabriel Scott, Larry Edwards, Rebecca Noblin | Alaska               |
| Viking Lumber Company, Inc.                                     | Don Howard, Bryce Dahlstrom, Karen Coffey    | Craig, Alaska        |
| City of Coffman Cove  | Misty Fitzpartick                            | Coffman Cove, Alaska |
| Private   | Brad Page                                    | Coffman Cove, Alaska |

Copies of the submitted comments are available upon request.

| Commenter     | Comment  | Response   |
|---------------|--|--|
|               | <b>General</b>   |  |
| Wayne Benner  | <p>"The City of Thorne Bay again expresses our concern for logs that are hauled within the city limits. The Kasaan Road (South Thorne Bay Road), Sandy Beach and Bypass road were initially constructed for the purpose of hauling logs from the forest to markets. The land owners or logging contractors then helped participate in the maintenance."</p>  | <p>Comment noted. The proposed operation is not within City of Thorne Bay limits, nor is it likely any haul operations will occur on the Kasaan Road, Sandy Beach Road or the Bypass road with this operation.</p>   |
| Wayne Benner  | <p>The City feels very strongly that the State of Alaska, Mental Health Trust, Sealaska and Forest Service all are shirking their responsibilities to help maintain the roads when logs from their properties are hauled through the City limits of Thorne Bay. The main roads in question are the Kasaan Road, where logs are hauled both directions, the Sandy Beach Road through town and the Bypass Road.</p> <p>"Road maintenance has become a huge issue as more and more people rely on the use of roads for their daily needs. Funding has also become a huge issue as government subsidies for road maintenance is no longer prevalent leaving Thorne Bay with less with the need to maintain more and more."</p> | <p>Comment noted. The Division of Forestry (DOF) recommends that the City of Thorne Bay define what the responsibilities of the operators are in maintaining the roads on which they haul. Historically, the DOF sale purchasers have compensated the City for hauling across City roads when negative impacts have occurred. The DOF requires timber sale purchasers to comply with all applicable law as a condition of the timber sale contract.</p>  |
| Wayne Benner  | <p>"It is not the logging that the city objects to but the profit making at the expense of the community."</p>   | <p>Comment noted. The DOF recognizes that there is an expense to the City of Thorne Bay in maintaining roads. It has been the DOF policy and will continue to be, to facilitate fair share compensation or maintenance to the City of Thorne Bay by State timber sale purchasers. It should be noted that the community receives direct economic benefits by providing support services for operators such as fuel, food, housing, medical and miscellaneous supplies. Also, citizens of Thorne Bay receive a direct benefit through employment opportunities and wages paid by the operator during the course of the timber harvest and milling operations.</p> |
| Wayne Benner  | <p>"The City is working hard with the City of Kasaan to get the Kasaan Road built and paved at least to Tolstoi which would help tremendously with future maintenance operations. However, until that time, help with daily maintenance physically or financially would very much appreciated by the citizens of Thorne Bay."</p>  | <p>Comment noted.</p> <p>The DOF will encourage its timber sale purchasers to fairly compensate the City of Thorne Bay through maintenance or financially on any haul road it uses through the City of Thorne Bay.</p>   |
| Kate Lankford | <p>The Coffman Cove Timber Sale would be critical to Papac Alaska Logging Inc. if the USFS Big Thorne timber sale is delayed. A delay in the Big Thorne sale would cause a depression in the logging industry of Prince of Wales Island. "The communities of this location are supported directly by the purchases made by the companies and individuals employed in the timber sale, as well as indirectly by the schools, medical facilities and housing..."</p>   | <p>No change required.</p>   |
| Kathleen Yarr | <p>"Please see that the Coffman Cove Timber sale is allowed to go through. It can be logged in an environmentally safe way."</p>   | <p>No change required.</p>   |

| Commenter                     | Comment   | Response  |
|-------------------------------|---|---|
| Chelsea J Goucher             | The Ketchikan Chamber of Commerce is in support of the Coffman Cove Timber Sale   | No change required.   |
| Chelsea J Goucher             | The timber industry and the Coffman Cove Timber sale supports our mission.  | No change required.   |
| Chere Klein                   | I am in support of the DOF's Coffman Cove Timber Sale   | No change required.   |
| Ghert V Abbott                | I am opposed to the proposed Coffman Cove Timber sale; it will "destroy 1,045 acres of old growth forest on Prince of Wales Island."  | Partial change. The acreage has been reduced to reflect field conditions and respond to comments. See the final Best Interest Finding.  |
| Ghert V Abbott                | The old growth forests in southeast Alaska are being consumed by logging and what will remain can not support our current ecosystem, subsistence rights, fishing industry and tourism industry. | <p>Partial change. The sale acreage has been reduced.</p> <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 for forest management and timber sales. The Operable Timber Base (OTB) on state land is just of 44,196 acres<sup>1</sup>. 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 16.8 million acre Tongass National Forest, 10 million acres of which is forestland. Of that, 5.6 million acres are classed as productive forestland and 4.9 million acres are considered to be productive old growth. Of the productive forestland, roughly 400,000 or only 7% of the total found on the Tongass has been harvested. The great majority of the forest is managed for non-timber uses, including subsistence, fishing, and tourism. Source: <a href="http://www.merid.org/TongassAdvisoryCommittee/~media/Files/Projects/tongass/Ecological/Working%20Forest%20Group%20Old%20Growth%20Land%20Base%20Analysis.pdf">http://www.merid.org/TongassAdvisoryCommittee/~media/Files/Projects/tongass/Ecological/Working%20Forest%20Group%20Old%20Growth%20Land%20Base%20Analysis.pdf</a></p> |
| Richard Hauver                | "I am in favor of the State of Alaska offering timber sales in southeast Alaska to support the local timber industry."  | No change required.   |
| Luke A 'Bear and Andrew Thoms | The Sitka Conservation Society is encouraged to see 583 acres of the proposal consisting of young growth stands.  | See change in Final BIF. The second growth harvest has been dropped to reflect stand conditions and market. DOF anticipates harvesting increasing volumes of second growth as it matures and demand increases.  |
| Luke A 'Bear and              | Young growth management is the future of the industry in southeast Alaska, and incorporation of this management with contemporary harvest will allow the  | No change required. Demand for industry's products at an economic price will govern the transition. This demand will affect the   |

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

| Commenter                    | Comment   | Response  |
|------------------------------|---|---|
| Andrew Thoms                 | industry to transition earlier.   | transition time period as much as the availability of the second growth timber.   |
| Luke A'Bear and Andrew Thoms | "We are eager to see cooperation between all landowners in southeast Alaska and consideration for the regions contractors so operational costs can be kept to a minimum."   | No change required. The DOF concurs that through cooperation with other landowners we can reduce operational costs. In fact, the DOF encourages adjacent landowners including the USFS, Alaska Mental Health Trust, University of Alaska, Native Corporations and private entities to conduct timber sale operations in conjunction with DOF to maximize economies of scale.  |
| Luke A'Bear and Andrew Thoms | The Sitka Conservation Society does not support the clearcutting of 1,045 acres of old growth in this sale. "A more responsible method would be partial or selective harvest that retains the ecological function of the forest and does not liquidate our future stocks of old growth in one sale."  | Partial change – acreage reduced. In the remaining sale area, the patchiness of merchantable timber will result in retention of adjacent multiage cover. These retained areas will maintain their ecological functions and will be left in a manner that future operations may occur. The proposed Coffman Cove Timber Sale may be conducted through multiple sales.  |
| Gabriel Scott et al          | "In sum, the proposed action is misguided, and we urge you to select either a no action alternative, or to adopt a significantly scaled-back project limited to small gaps and thinning in second growth, designed to facilitate wildlife habitat. Please drop the old growth component of this offering, and do not construct any new roads."    | Partial change – acreage reduced. The Best Interest finding describes an appropriate harvest plan that follows the statutory requirements of sustained yield and multiple use management. This BIF is consistent with the legislated primary purpose for the Southeast State Forest which is "timber management."   |
| Gabriel Scott et al.         | "We are very concerned about the cumulative effects of this project, in combination with logging also planned for USFS, Sealaska and UA land. Cumulative effects should be considered carefully and discussed explicitly in the PBIF. Logging on UA, Mental Health, USFS and Sealaska land at the same time changes the nature of this decision." | No change. 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. |
| Gabriel Scott et al.         | Area roads are mess within the forest.  | No change. Roads constructed for the purpose of commercial timber sales on non-federal land are required to meet the standards in the Forest Resources and Practices Act (FRPA; AS 41.17). This includes roads within the areas managed by the DOF. All non-federal forest roads on POW, including DOF roads are currently compliant with FRPA.   |
| Gabriel Scott et al.         | The forest is severely compromised due to past clearcuts  | No change. Harvest units within this area range from approximately 10 to 120 acres. Clearcut harvesting is proposed to ensure rapid reforestation with native species. The result will be a mosaic of age types on state and other forest land within this area.  |
| Gabriel Scott et al.         | The location of reserve stands of old-growth and connectivity between them is important.  | Concur; no change needed. The ADF&G Division of Wildlife Conservation was consulted on this subject during the development of the area plans. The USFS has provided for this function extensively on federal land as well.  |

| Commenter            | Comment   | Response   |
|----------------------|---|--|
| Gabriel Scott et al. | In adopting a FLUP, the commissioner is to use the "best available data." Additionally, under due process principles decisions must be documented. This PBIF does neither   | No change needed. FLUPs are required to use "best available data." A FLUP will be completed prior to any harvest activity taking place and will be subject to public and agency review. This final BIF documents the best interest decision, including references used, and interagency consultation.  |
| Gabriel Scott et al. | "Cutting units are not designated (on map). The scale is so large as to make site-specific commenting impossible."  | No change needed. BIF maps show proposed harvest areas to provide an overview of the area within which cutting units will be identified. Cutting units will be refined and shown in more detail when FLUPs are developed for individual timber sales within this area.   |
| Gabriel Scott et al. | This PBIF states consultation with ADF&G and DEC has occurred within the sale and/or will occur prior to sale. Does that mean consultation has occurred or not? If consultation has occurred is should be in this PBIF. | No change needed. Consultation with ADF&G and DEC occurs throughout the planning process, including the development of State Forest and area plans, FYSTSs, BIFs, and FLUPs. Consultation has occurred on this sale (e.g., see p. 12, p. 14). Further consultation will occur with ADF&G and the DEC in the FLUP process.  |
| Gabriel Scott et al. | Actions can not take place on State Forest lands until a management plan is in place and if no management plan is in place a FLUP.  | Concur; no change needed. The Prince of Wales Island Area Plan is the Management Plan that was used to scope issues prior to the adoption of Southeast State Forest Management Plan. The SESFMP was adopted on February 29, 2016; this sale conforms to this plan. A FLUP will be done as well. No harvest activity or road building will occur prior to the finalization of a FLUP.                                 |
| Gabriel Scott et al. | It is unrealistic for a logging company to know about nest sites, fish streams, mitigation corridors and a logging company cannot balance concerns.   | No change needed. In the case of the Coffman Cove Timber Sale, all layout design will be completed by DOF staff foresters, familiar with timber sale layout protocol in Southeast Alaska. Input will be provided by ADF&G on issues related to fish and wildlife and by DEC on concerns related to water quality. Retention areas will be well marked on the ground and further discussed with the logging operator. |
| Gabriel Scott et al. | This PBIF does not complete analysis of transportation.   | No change needed. Transportation and access are addressed in sections V.D. and V.E.3.b. More detailed road design will occur as individual sales and harvest units are developed in the FLUP process.  |
| Gabriel Scott et al. | This PBIF does not complete analysis of silviculture prescription.  | No change needed. The BIF provides the framework for silvicultural management (e.g., see section V.E.3) of timber sales that occur within this area. Site specific prescriptions will be developed and described in the FLUP process.  |
| Don Howard et al.    | We are in support of the proposed Coffman Cove Timber Sale  | No change required.  |
|                      | <b>Cultural Resources</b>   |  |

| Commenter                    | Comment   | Response  |
|------------------------------|---|---|
| Judith E. Bittner            | <p>“State law requires all activities requiring licensing or permitting from State of Alaska to comply with the Alaska Historic Preservation Act, which prohibits the removal or destruction of cultural resources (historic, prehistoric, and archaeological sites, locations, remains or objects) on land owned or controlled by the state. This also includes reporting of historic and archaeological sites on lands covered under contract with or licensed by the state or governmental agency of the state.”</p>   | <p>Concur; no change needed. The DOF shall comply with the Alaska Historic Preservation Act.</p>  |
| Judith E. Bittner            | <p>“The Alaska Heritage Resource Database (AHRD) indicates that there are no known cultural resource sites within the proposed timber sale areas. However, please note that only a very small portion of the state has been surveyed for cultural resources and even after an area has been surveyed the possibility remains that previously unidentified resources may be located within the project area. As such, should inadvertent discoveries occur during the duration of the project, our office should be notified so that we may evaluate whether the resource should be preserved in the public interest.”</p> | <p>Concur; no change required. If any historic or archaeological sites are encountered or identified by the DOF or its operators within the proposed harvest area during road construction or harvest activities, DOF will immediately inform SHPO and take action to protect the findings.</p>   |
|                              | <p><b>Water Quality/ Fisheries</b></p>  |   |
| Gabriel Scott et al          | <p>The PBIF does not complete analysis of fish streams or water quality streams in this PBIF</p>  | <p>No change needed. Fish habitat is addressed in section V.F.4. ADF&amp;G-Habitat visited the project, and the BIF is compliant with FRPA fish habitat protection standards. More detailed site specific actions designed for individual sales within this area will be described in the FLUP process, which is subject to public and agency review.</p>   |
|                              | <p><b>Wildlife</b></p>  |   |
| Luke A’Bear and Andrew Thoms | <p>This sale could cause significant adverse impacts to wildlife on Prince of Wales Island. “In isolation this sale could have minimal impact to wildlife” but at a larger scale, across land ownerships it’s evident the POW has been heavily logged causing damage to wildlife populations. More old growth harvesting will further reduce suitable wildlife habitat and lead to more fragmentation.</p>  | <p>On Prince of Wales Island, the State is a minor property owner. See BIF Wildlife section for current ownership percentages. The ADF&amp;G- Division of Wildlife Conservation was consulted on site specific and overall wildlife conditions that might be affected by this sale.</p>   |
| Luke A’Bear and Andrew Thoms | <p>The Coffman Cove Timber sales close proximity to Coffman Cove will negatively impact residents hunting and fishing abilities.</p>  | <p>No change. The residents of Coffman Cove did not voice concerns regarding access to fish and wildlife as a result of this timber sale. The sale does not occur adjacent to or restrict access to streams used for subsistence or sport fisheries. Access for hunting areas is widely distributed on Prince of Wales Island (POW) and will not be significantly impaired; timber roads may provide additional access in some areas. Prince of Wales Island offers an extensive network of public roads to meet this need.</p> |
| Gabriel Scott et al.         | <p>This PBIF does not complete analysis on wildlife concerns.</p>   | <p>ADF&amp;G Division of Wildlife Conservation visited the area and advised DOF on wildlife impacts from the timber sale.</p>   |
|                              | <p><b>Economics</b></p>   |   |
| Kate Lankford                | <p>The communities of Southeast Alaska and in particular Prince of Wales are supported by the purchases made by companies and employed individuals involved</p>   | <p>No change required.</p>  |

| Commenter                    | Comment  | Response   |
|------------------------------|--|--|
| Kate Lankford                | in the timber industry.<br>Papac Alaska Logging, Timberwolf Cutting, Viking Lumber and all their vendors are key members of commerce in the area and are dependent on the State and the USFS large timber sales.   | No change required.  |
| Kate Lankford                | If Big Thorne is delayed past April 2015 we will have insufficient work to support ourselves and our community.  | No change required.  |
| Chelsea J Goucher            | The Coffman Cove Timber Sale will help sustain jobs and industry on Prince of Wales Island.  | No change required.  |
| Chere Klein                  | "The DOF should proceed with the maximum allowable sale to ensure the region has an economy that is supported by adequate resources to ensure job growth for economic development"   | Note: The sale area has been decreased due to concerns from the City about units in the municipal watershed and the economics of second growth harvest at present. As second growth stands mature and markets evolve, DOF will reevaluate those stands for future sales.   |
| Chere Klein                  | The Coffman Cove Timber Sale will help provide enterprise "for an area that has few jobs and limited opportunities for job growth or sustainability."  | No change required.  |
| Chere Klein                  | "90% of southeast Alaska is federally owned and communities face high unemployment due to the lack of a pro-active approach to sustainable and renewable resource development. This project would help to bring back some timber economy."   | No change required.  |
| Ghert V. Abbott              | "The economic benefits of this sale is not worth the ecological costs"<br>The momentary benefits and subsidies in logging are temporary and will fade, leaving a gap within southeast Alaska.  | No change. The community of Coffman Cove was created initially as a log transfer facility. Logging has been a part of southeast Alaska for over 100 years.<br>The Coffman Cove Timber Sale is not subsidized; it is projected to generate revenue to the State and contribute to the island's economy. The sale is designed to avoid or minimize impacts to other resources, and is consistent with the purpose of the Southeast State Forest and other lands designated for forest use in regional plans.   |
| Luke A'Bear and Andrew Thoms | "If this large proportion of old growth does go ahead SCS hopes at the very least the State will seek to obtain the maximum value of this old growth timber. The current paradigm sees most of our timber shipped out-of-state to international markets in the round. There is little added-value in this business model and does only the minimal to stimulate the local economy. We hope the state will have provisions in place that incentivize the local processing." | No change needed. Historically, maximum value on the stumpage has been received when exporting logs in the round has not been restricted. Additionally, exporting timber has provided jobs within southeast Alaska through means of harvesting the timber, road construction, and transportation of the harvested logs. However, the DOF through legislative process and the Governor's direction have affirmed the State's intent to support value added processing in the local economy. As a result of this the DOF has selected to sell this sale by means of AS 38.05.115, AS 38.05.118 and AS 38.05.123. Timber sold by means of AS 38.05.115 is restricted to 500 MBF and under. Timber sold under AS 38.05.118 requires valued added manufacturing within the State of Alaska and timber sold under AS |

| Commenter                                 | Comment   | Response  |
|---|---|---|
| Gabriel Scott et al.                      | The PBIF fails to make real economic analysis. The timber has not been cruised and the commissioner must have this information to assess supply and markets and to determine what the timber should be sold for.  | 38.05.123 requires high-value-added manufacturing within the state. No change. Costs and benefits are described in section V.G. The timber value for this sale was estimated prior to the development of the PBIF by means of the forest inventory information and staff experience. It has now been cruised based on the delineation of the units in anticipation for issuing FLUP(s). Specific cruise volumes and analysis will be found within the individual FLUP's and subsequently in the sale prospectus for this sale area. |
| Don Howard et al.                         | Viking lumber has become increasingly dependent upon state timber sales to provide a consistent supply of timber to the mill  | No change required.   |
| Don Howard et al.                         | This sale is important because of the delay in the USFS Big Thorne Stewardship contract.  | No change required.   |
| Don Howard et al.                         | Without the Coffman Cover Timber Sale Viking Lumber Company would most likely experience a shortage of logs and this would affect the mills ability to operate. "Close to 100 people and their families and subcontractors are affected by the availability of timber." | No change required.   |
| Don Howard et al.                         | Viking is important to the economy of Prince of Wales and Viking does a substantial amount of business with Alaska Power and Telephone, Tyler Rental, Service Auto Parts, Shaub-Ellision, Petro Marine, Alaska Marine Lines and Boyer Towing.                           | No change required.   |
|   | <b>Planning</b>   |   |
| Misty Fitzpatrick<br>City of Coffman Cove | "The City of Coffman Cove is opposed to logging within our municipal watershed. The removal of vegetation within the watershed could have significant negative impacts on our water quality and possibly leave our already damaged water intake, complete inoperative." | Change. The DOF worked with DEC to map the Chum Creek watershed and delineate the DEC classified Coffman Cove Drinking Water Protection Area. Based on this information, the DOF removed all proposed harvest and associated road construction from the water protection area. See the Final BIF for more detail.   |
| Misty Fitzpatrick<br>City of Coffman Cove | "Because the proposed timber harvest is located along the scenic byway entering the community, the harvested area will be the first thing visitors see when arriving in Coffman Cove."  | No change. The harvest operations will be visible from both the Scenic Byway and the City of Coffman Cove. The area surrounding the community of Coffman Cove has been historically and currently used for timber production. At the present time as in the past, harvest operations are visible throughout the area and as you enter the community of Coffman Cove.  |
| Misty Fitzpatrick<br>City of Coffman Cove | "We request that the State of Alaska construct a timber harvest interpretive sign and small parking area near one of the clear-cuts. We believe that educating visitors on the cultural and economic aspect of timber harvest is a crucial part of this project."       | No change. The DOF will consider this if budget appropriation provides a funding method; DOF would welcome an opportunity to work with the community on this project. The DOF would assist the City with technical information if they wanted to lead in this effort.   |
| Brad Page                                 | This individual requested that a portion of the proposed sale area be removed from  | Change. The DOF has removed the nine acres from the proposed  |



| Commenter | Comment  | Response  |
|-----------|--|---|
|           | <p>the sale area. Specifically, the individual requested that nine acres be removed east of the USFS 3030 road. A University of Alaska Facilities and Land Management map dated September 2013 depicted this as Green Space.</p> | <p>harvest area.</p> <p>It should be noted that the University of Alaska solely determines land uses on its lands, and does not direct land use within other State lands. Land use on State lands within this area is determined by the <u>Prince of Wales Island Area Plan</u> and on Southeast State Forest lands by the <u>Southeast State Forest Management Plan</u>.</p> |

