STATE OF ALASKA DEPARTMENT OF NATURAL RESOURCES DIVISION OF FORESTRY & FIRE PROTECTION



FAIRBANKS-DELTA AREA FORESTRY

PRELIMINARY BEST INTEREST FINDING AND DECISION FOR

Woodstove Spruce Timber Sales NC-1859-D, NC-1905-D, NC-1916-D, NC-1923-D, NC-1926-D June 2025

Abbreviations

AAC Alaska Administrative Code

ADEC Alaska Department of Environmental Conservation

ADF&G Alaska Department of Fish and Game

ADNR Alaska Department of Natural Resources

AS Alaska Statute

BIF Best interest finding

CCF 100 cubic feet (timber volume)

DBH Diameter at breast height (4.5 feet above root collar)

DMLW Division of Mining, Land and Water

DOF Division of Forestry & Fire Protection

FLUP Forest Land Use Plan

FRPA Alaska Forest Resources and Practices Act

FYSTS Five-Year Schedule of Timber Sales

MBF Thousand board feet

OHA Office of History and Archeology

ROW Right-of-way

TVSF Tanana Valley State Forest

TVSF MP Tanana Valley State Forest Management Plan

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I. PROPOSED ACTION

DOF is proposing to offer for sale over the next five years approximately 43 acres of spruce fuel and sawlog timber from State lands in the Cummings Road East area near the Alaska Highway. The cumulative volume to be offered totals at least 378 Cords (340 CCF) of mixed fuelwood and 255 MBF (622 CCF) of spruce sawlogs in at least 5 separate sales. Some of the larger proposed areas may be divided into smaller units, and some small units < 10 acres may be added within the provided legal description should market demand exceed the 5 planned sale areas. DOF would sell the timber as a combination of competitive bid timber sales (AS 38.05.120) and small negotiated timber sales (AS 38.05.115) for commercial use. For this timber sale, the PBIF and Draft FLUP are being issued for review at the same time. The proposed sales covered by this PBIF appeared in the 2024 Fairbanks-Delta Five Year Schedule of Timber Sales (FYSTS) or are less than 10 acres (sales under 160 acres are exempt from FYSTS requirements as described in AS 38.05.113).

The management objectives for the proposed timber sales are:

- Provide raw material for the forest industry to produce timber products that provide benefits to the state and local economy through employment opportunities.
- Harvest the commercial sawtimber and fuelwood before a significant decrease in vigor occurs and return the site to a young, productive mixed forest.
- Provide firewood for the residential heating needs of interior Alaska communities.
- Promote multiple use management that provides for the production, utilization, and replenishment of timber resources while perpetuating personal, commercial, and other beneficial non-timber uses of forest resources.

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 Fairbanks-Delta Area Office filed as NC-1859-D, NC-1905-D, NC-1916-D, NC-1923-D, and NC-1926-D.

IV. SCOPE OF DECISION

This preliminary best interest finding (PBIF) is the first part of step three of a six-step process to design, sell, and administer timber sales. The following list summarizes the overall process:

<u>Step 1: Regional planning</u>. The Department of Natural Resources (DNR) 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 allowable use, and what other uses must be considered when designing and implementing sales. Subsequent land use decisions must be consistent with the area plans. The area in this PBIF is covered by the Tanana Valley State Forest Management Plan (2025 Update). The finding also considers the Interagency Wildland Fire Management Plan, and the 2012 Delta Junction and Greater Delta Area Community Wildfire Protection Plan (CWPP).

Step 2: Five-year Schedule of Timber Sales (AS 38.05.113). The Fairbanks-Delta Area Office prepares a Five-year Schedule of Timber Sales every other year. The Schedule identifies proposed sales, including their location, volume, and main access routes. The Five-year Schedules are scoping documents that provide an opportunity for public, agency, and industry to identify potential issues and areas of interest for further consideration in the best interest finding and Forest Land Use Plan. A proposed timber sale greater than 160 acres must appear in at least one of the two Five-year Schedules preceding the sale.

Step 3: Best Interest Finding. 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.

The Preliminary Best Interest Finding (PBIF) is intended to provide sufficient information for reviewers to ensure that the best interest of the State will be served by the proposed action.

After public and agency review of the PBIF, DOF reviews comments, makes changes as appropriate, and issues a final best interest finding (BIF). DOF must adopt a final BIF before selling timber. An eligible person affected by this decision, and who provided timely written comment or public hearing testimony to the department, may appeal the decision to the DNR Commissioner per AS 44.37.011 and 11 AAC 02.

Step 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 may prepare multiple FLUPs for the harvest areas within the overall sale area covered by this best interest finding if DOF determines they differ in silvicultural characteristics. 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, agency and community consultation, and site-specific analyses by the DOF, and will be subject to public and agency review.

<u>Step 5: Timber sales and contracts</u>. Following adoption of the final best interest finding, and completion of the FLUP, DOF will offer the timber for sale by 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.

Step 6: Sale administration. DOF administers timber sales and conducts field inspections to ensure compliance with the final best interest finding, FLUP, timber sale contract, and applicable laws, including the Alaska Forest Resources and Practices Act 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 proposed sales are located approximately 28 miles southeast of the Delta Area Forestry office in the Cummings Road area north of the Alaska Highway at milepost 1392. The proposed sales are accessed via a forest road spur from the east side of Cummings Road 5.0 miles from the Alaska Highway.

- NC-1859-D / Cliffhanger #3 (18.3 acres) is within Sections 1 & 12, T12S, R14E, Fairbanks Meridian
- NC-1905-D / Woodstove Spruce #2 (3.6 ac) is within Section 6, T12S, R15E, F.M.
- NC-1916-D / Woodstove Spruce #3 (13.1 ac) is within Section 6, T12S, R15E, F.M.
- NC-1923-D / Cummings 5 Mile Spruce (3.5 ac) is within Section 7, T12S, R15E, F M
- NC-1926-D / Woodstove Spruce #4 (4.9 ac) is within Section 6, T12S, R15E, F.M.

B. Title status

The proposed sale areas are owned and managed by the State of Alaska Department of Natural Resources. The acquisition for the land upon which the sale areas are proposed is based on General Selection 809, the title transferred by Patent 50-2019-0015. The first 1/4 mile segment of the access road traverses private parcels within a 50-foot easement on either side of the section line between Sections 7 and 18, T012S015W. There are no known title restrictions in these areas.

C. Land use planning, classification, and management intent

The proposed area is legislatively designated as part of Subunit 10C of the Tanana Valley State Forest (AS 41.17.400), and is managed according to the Tanana Valley State Forest Management Plan, 2025 Update. Subunit 10C will be managed "for commercial and personal use timber production while protecting fish and wildlife habitat and recreation use near the Tanana and Volkmar Rivers and other waterbodies." Subunit 10C will remain open to mineral location and leasing.

The Interagency Fire Management Plan includes these lands in the 'Full' protection category.

D. Current access and land use:

The proposed sales are located east of Cummings Road, which is accessed north of the Alaska Highway at milepost 1392. The proposed sales are accessed via the Cummings 5-Mile Forest Road from the east side of Cummings Road 4.9 miles from the Alaska Highway.

A large parcel of privately owned agricultural land abuts the project area to the south. The 1,672-acre parcel was first conveyed from State to private ownership as ADL 407927 in 1982, and the most recent conveyance appears to be State Patent 20087. This area is used for agriculture and private residences. A 40-acre agricultural parcel, serialized as ADL 407926, consists of the SE 1/4 of the SW 1/4 of Section 7 (also called Tract E-1-B) and borders the access into the sale area.

Existing land uses within this part of TVSF consist of motorized recreational access, hunting, trapping, and personal use and commercial timber harvest.

E. Background and description of proposal

- 1. <u>Background</u>: The proposed timber sales are within the legislatively-designated Tanana Valley State Forest. According to the TVSF Management Plan, 2025 Update, Subunit 10C will be managed "for commercial and personal use timber production while protecting fish and wildlife habitat and recreation use near the Tanana and Volkmar Rivers and other water-bodies." The Division of Forestry is offering these sales with the intent to maintain a productive working forest while continuing to provide opportunities for dispersed recreation and maintaining habitat quality. These sales help meet the consistent demand for small, road accessible sales by small local logging outfits.
- 2. <u>Timber volume and sustained yield</u>: The proposed sale areas have an estimated 378 Cords (340 CCF) of mixed fuelwood and 255 MBF (622 CCF) of spruce sawlogs in at least 5 separate sales on approximately 43 acres. Final harvest unit boundaries and timber volume estimates will be determined upon completion of sale preparation activities. The Delta Area Annual Allowable Cut (AAC) is calculated at approximately 3,948 acres of harvest annually. The volumes proposed in these harvests alone, and in combination with timber volumes from other proposed timber sales, will be within the Annual Allowable Cut and comply with sustained yield requirements.
- 3. <u>Harvest unit design</u>: The 43 acres to be offered is proposed to be split between at least five individual sales. Cutting units buffer stand type boundaries and existing harvest units to retain an adequate seed source of mature birch or mixed birch and spruce. Cutting units will be designed to incorporate buffers of at least 50 feet from private property boundaries to protect public safety from direct harvest activities.
 - a. <u>Reforestation and site preparation</u>: The sale area will be reforested in compliance with the Forest Resources and Practices regulations (11 AAC 95.375-.390). The preferred reforestation method for rotational harvest is via natural seeding from

adjacent trees. The harvest unit design described above retains adjacent mature forest to provide an adequate seed source. Reforestation will be assessed five years post-harvest with a regeneration survey if the site appears to have marginal seedling establishment. If surveys indicate inadequately stocked areas (less than a minimum of 450 evenly distributed trees per acre of commercial species), additional silvicultural actions may be performed to intervene and improve stocking.

- b. <u>Access design and construction</u>: Access design, construction, and maintenance will comply with the Forest Resources and Practices regulations (11 AAC 95.285-.355).
 - Each sale is accessed via Cummings Road, which connects to the Alaska Highway at Mile 1392. Cummings 5-Mile Forest Road is an all-season secondary road that intersects Cummings Road on the east side 4.9 miles from the Alaska Highway. Access for each proposed sale:
 - NC-1859-D is 0.6 miles along Cummings 5-Mile Forest Road, then a 0.6 mile spur continues east through timber sale NC-1667-D. The spur road will need to be extended approximately 0.1 mi to reach the sale boundary.
 - o **NC-1905-D** is 1.9 miles along Cummings 5-Mile Forest Road, then adjacent to the east of the road.
 - o NC-1916-D is 1.7 miles along Cummings 5-Mile Forest Road, then a new spur road to the west approximately 0.2 miles must be constructed to reach the sale boundary.
 - o NC-1923-D is 0.25 miles along Cummings 5-Mile Forest Road, then 0.1 miles east along a section line spur.
 - o NC-1926-D is 1.7 miles along Cummings 5-Mile Forest Road, then adjacent to the west of the road.
 - The existing roads will be maintained to the all-season road standards set out in the AFRPA and the DOF Road Standards.
 - Between individual sale harvests any spurs will be inactive and maintained in accordance with 11 AAC 95.315 (f).
 - Generally, DOF applies for public easement rights-of-way for long-term routes, but access spur roads do not qualify.
- c. <u>Appraisal method</u>: DOF will appraise the timber value in compliance with 11 AAC 71.092. Commercial sales will be based on transactional evidence and market demand and DOF will apply a value for those products.

F. Resources and management

1. Timber.

a. <u>Timber stand composition and structure</u>: The proposed sale areas are of a similar mature spruce forest type with minimal hardwoods. The stands have a high density of stems with a 70% closed canopy, an average age of 104 years at breast

height, and a site index of 75-80 feet tall at 100 years age. Recon plots resulted in basal area estimates of 100 ft² of spruce sawlog, with an average DBH of 11 inches and average height of 75 ft, and 40 ft² of spruce fuelwood, with an average DBH of 8 inches and average height of 65 ft. Minimal rot or form defect was observed, and the stand appeared healthy. Small components of black spruce are present in the understory. Senescing aspen is a minor component, and significant amounts of downed aspen and spruce logs are present. The understory is mostly moss with few vascular plants.

b. Stand silvics: Data and research on regeneration and growth characteristics of these species are compiled within the Resource Analysis of the Tanana Valley State Forest (TVSF) Management Plan. The harvest and reforestation systems available in Interior Alaska are also reviewed and listed in the Resource Analysis. The results of the public and agency discussions for harvest and reforestation are discussed in the TVSF Management Plan. Silvicultural harvest systems that facilitate even-aged (natural) management are generally preferred. They mimic the ecological impact of wildfire and other disturbances and result in the greatest increase in site productivity. Even-aged management is normally accomplished through clear cuts, patch cuts and heavy partial cuts (such as seed tree or shelterwood systems), which opens up the site to maximum solar gain. This results in the greatest production of both young hardwood that is important to wildlife and the spruce understory valuable years later as timber. Even-aged management techniques are utilized to provide young, vigorously growing stands in juxtaposition to older, undisturbed stands. Such placement of harvest units can optimize natural seeding and the edge effect.

All proposed sales are clearcuts to remove the dominant spruce overstory that should provide a high-light and exposed mineral soil environment favorable to release advance regeneration of spruce and microsites for spruce seedlings to establish.

c. <u>Topography and Soils</u>: The proposed sales 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)).

All sales were basically on flat ground with some old reforested sloughs providing the only topographic relief. The elevation of the sale area is \sim 1,200 ft above sea level.

- NC-1859-D is underlain by the Moosehead silt loam typical of floodplains, with yields to gravelly sand by 30 inches depth. This soil type is rated as well-drained, with minimal permafrost noted, and a water table typically within 36 inches of the surface.
- NC-1923-D is underlain by the Salchaket silt loam typical of floodplains, with yields to a shallow sand-silt mix by 7 inches depth. This soil type is rated as well-drained, with minimal permafrost noted, and a water table typically more than 80 inches below the surface.
- NC-1905-D, NC-1916-D, and NC-1926-D are underlain by the Jarvis silt loam typical of floodplains, with yields to very cobbly sand by 15 inches depth. This soil type is rated as well-drained, with minimal permafrost noted, and a deep water table typically more than 80 inches below the surface.
- 2. <u>Agriculture</u>. Cummings Road provides access to numerous agricultural parcels sold by the State since the 1980s. The proposed sales are not anticipated to have any impact on current or future agricultural activity in the area, and any effects of any timber sale operations for agricultural uses will be minimal.
- 3. Wildlife habitat and harvest. According to the TVSF Management Plan, 2001 Update, wildlife habitat resources within Unit 10 are described as follows: "A substantial number of peregrine falcon nests have been identified along the Tanana River, and many eagles and other raptors are known to nest in bottomlands. Large numbers of sandhill cranes, waterfowl, and other birds migrate through the area." Should an eagle nest tree be discovered in the sale area, the nest tree will be marked on the ground and a 330-foot no-harvest radius will be established to protect the tree. No critical wildlife habitat has been identified for this area (TVSF Management Plan).

Treatments proposed for this stand are projected to enhance habitat conditions for moose, voles, hares, and ultimately, lynx, marten and fox. In the past, Alaska Department of Fish and Game, Division of Wildlife Conservation have recommended managing for as much diversity as possible when prescribing harvest unit size, shape and position to mimic the results of wildfire or other stand replacement phases such as insect outbreaks or flood events. To accomplish these objectives snags will be retained wherever feasible to provide late-successional wildlife habitat for hole nesting birds, woodpeckers, small mammals, and other species requiring perching habitat. The units will be laid out with an uneven edge, along and between timber types. This will create varied edge effect that is beneficial to many wildlife species.

4. <u>Fish Habitat, water resources, and water quality</u>. The Tanana River is the nearest catalogued anadromous waterbody, and is categorized under FRPA as a Type III.B. waterbody (glacial, with resident fish). The proposed sale areas are at least 100-4,000 feet from the active channels of the Tanana River, and there are no known perennial streams impacted by the sale areas or the access roads. **NC-1905-D** includes a 100-ft timber retention buffer between the sale boundary and the river.

The proposed sales 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). DOF will ensure Best Management Practices are being adhered to by requiring a complete logging plan prior to the start of any harvesting, conducting on-site inspections during logging operations and a final inspection prior to terminating the timber sale.

- 5. Recreation, tourism, and scenic resources. The Cummings Road area is used for recreational activities year-round, primarily by local residents. During the snow-free months OHV riding and hunting are common uses, and the area provides informal boat launch access to the Tanana River. During the winter months trapping, dog mushing, and snowmachining are common. Depending on the rate of Tanana River erosion, NC-1905-D may be visible to river users over time.
- 6. <u>Cultural Resources</u>. 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. If additional archaeological sites are identified, proposed harvest 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.
- 7. Subsurface Resources. Generally, State land is open to mineral entry and is available for leasing subject to Mineral Orders. However, the sale area is subject to Mineral Closing Order 271 (MCO 271, initiated 1982). An MCO closes state land to all forms of mineral entry, making it unavailable for staking mining claims, leasehold locations or prospecting site locations (see AS 38.05.195, 38.05.205 and 38.05.245). Nonetheless, the proposed timber sales are not expected to have any deleterious effects on subsurface activities.

G. Costs and benefits

Local commercial logging operators and their customers will benefit from the inflow of raw timber into the market. In addition to generating royalties to the State's general fund, the proposed sales will create economic benefits for the community of Delta Junction and other locations in Alaska. The local business community will receive direct economic benefit from providing support services for the operators through sales of fuel, food, housing, medical and

miscellaneous supplies. Local residents may receive an indirect benefit through any local taxes paid by the operator and employees during the timber harvest operations.

The sales are also expected to benefit the local economy by providing jobs. They will have a positive impact on local employment by generating numerous man-hours of work associated with the harvest and transportation of wood products from this sale. Additionally, the public may benefit from additional access to personal use fuelwood areas, as home heating costs remain high in Interior Alaska.

Minimal negative effects are expected on fish and wildlife habitat or water quality due to the distance of these sales from the Tanana River and the retention of adjacent seed source which may provide additional travel corridors for wildlife. Some types of wildlife will benefit from early stages of forest development, which may provide additional opportunities for hunters and trappers. Maintenance and upgrades to existing roads may increase areas for recreation, dispersing forest road users over a broader network.



VI. PUBLIC REVIEW

The public and agencies are invited to comment on this Preliminary Best Interest Finding. Objections or comments pertaining to the proposed action must be received in writing by the DOF Fairbanks-Delta Area Office by 4:30 PM AKDT Monday, July 14th, 2025 in order to ensure consideration for review. Comments should be mailed to the State of Alaska, Division of Forestry & Fire Protection, 3700 Airport Way, Fairbanks, AK 99709 or by email to andrew.allaby@alaska.gov. For more information you may contact Andrew Allaby, Fairbanks-Delta Area Resource Forester, at 907-451-2603 or andrew.allaby@alaska.gov. To be eligible to appeal the final decision, a person must have provided written comment by 4:30 PM AKDT Monday, July 14th, 2025.

VII. PUBLIC NOTICE

This PBIF will be publicly noticed in compliance with AS 38.05.945. Notice will be posted on the Alaska Online Public Notice System, and both physical and electronic notices will be mailed to previous timber sale bidders as well as any property owners or business interests known to the Division in the proposed sale area. Notice will also be posted on the Division of Forestry public webpage.

VIII. ALTERNATIVES AND DISCUSSION

There are 4 possible alternatives to consider for this project area. A discussion of each of the alternatives follows. All alternatives are consistent with the area plan and applicable statutes and regulations.

1. To continue the sale(s) as proposed.

This alternative meets the objectives of the Five-Year Schedule of Timber Sales and DNR's constitutional mandate, and is consistent with the land classification. It also meets the silvicultural objective of improving forest vigor, provides for a value-added end product and creates additional jobs in Alaska due to the combination logging and trucking. This alternative also complies with the management objectives of the TVSF Management Plan for Subunit 10C.

2. To modify the sale(s) by making them smaller or larger.

The proposed sale units are logical settings for typical commercial logging equipment in Interior Alaska. The sizes of these sales are designed to be large enough to be economically viable considering access development and mobilization costs and distance to processing facilities. Sales within this size range are appropriately balanced to maintain other resource values as well as provide economic benefits to the Tanana Valley.

3. Defer the sale(s) of this timber to a later date.

Deferring harvest to a later date would fail to meet many of the objectives of the sale program. One of the main objectives is to make State-owned timber consistently available to the timber industry.

4. Do not offer this timber for sale.

This alternative would result in not meeting any of the objectives outlined for this management action. Utilization of the forest resource would not be achieved. There would be no significant contribution to the State and local economies. This alternative would delay the management objectives planned for the area, deny making a source of raw materials available to the local wood products industry, and would delay the harvest of mature trees, prior to the onset of disease or insect infestation. Decay and senescence of mature birch trees results in the loss of economic value.

IX. RECOMMENDATION AND PRELIMINARY DECISION

After due consideration of all pertinent information and alternatives, the DNR has reached the following Preliminary Decision: To offer for sale approximately 43 acres of mature spruce forest in the Cummings Road area as proposed in Alternative One and described in this PBIF. The DOF finds that this preliminary 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) & 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).

To be eligible to participate in any appeal or request for reconsideration of the final finding, a person must be affected by the decision, and must have submitted comment to the preliminary finding and decision during the comment period.

If you have any questions, please contact Fairbanks-Delta Area Resource Forester, Andrew Allaby, andrew.allaby@alaska.gov, 907-451-2603.

X. SIGNATURE		
Kevin Breitenbach	Date	_
Fairbanks-Delta Area Forester		
Division of Forestry & Fire Pro	tection, Alaska Department of Natural Resources	

XI. ATTACHMENTS

Maps of the proposed project area follow.



