

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



KENAI-KODIAK AREA FORESTRY

BEST INTEREST FINDING
NASH ROAD TIMBER SALE
SC-3265-K

October 2026

Abbreviations

ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
BIF	Best interest finding
CCF	100 cubic feet (timber volume)
DMLW	Division of Mining, Land and Water
DFFP	Division of Forestry and Fire Protection
FLUP	Forest Land Use Plan
FRPA	Alaska Forest Resources and Practices Act
FYSTS	Five-year Schedule of Timber Sales
KEAP	Kenai Area Plan
MBF	Thousand board feet
OHA	Office of History and Archeology
ROW	Right-of-way
SHPO	State Historic Preservation Office
USFS	United States Forest Service

Table of Contents

I.	PROPOSED ACTION.....	4
II.	STATUTORY AND REGULATORY AUTHORITY.....	4
III.	ADMINISTRATIVE RECORD.....	4
IV.	SCOPE OF DECISION.....	5
V.	PROJECT LOCATION, LAND STATUS, AND DESCRIPTION.....	6
VI.	PUBLIC REVIEW.....	11
VII.	PUBLIC NOTICE.....	11
VIII.	RECOMMENDATION AND PRELIMINARY DECISION.....	11
IX.	SIGNATURE.....	12
X.	APPENDICES.....	13
	Appendix A SC-3265-K Nash Road Timber Sale Maps.....	14
	Appendix B References.....	16
	Appendix C Appeal and Request for Reconsideration Regulations (reserved).....	17
	Appendix D SC-3265-K Nash Road Timber Sale Comments & Responses.....	21

I. PROPOSED ACTION

The Division of Forestry & Fire Protection (DFFP) is proposing to offer approximately 55 acres of Sitka spruce saw logs from state lands near milepost 2 of Nash Road in Seward (see Appendix A, Nash Road Timber Sale Map). Unit 1 will be 45 acres, and Unit 2 will be 10 acres. The volume to be offered totals approximately 829 MBF (1,974 CCF). DFFP would sell the timber as a sealed bid for commercial use under provisions of AS 38.05.120. For this timber sale, a Draft Forest Land Use Plan (FLUP) will also be issued for review.

The management objectives for the proposed timber sale 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 public interest.
2. To provide state timber for production of wood products for commercial and personal use.
3. To help the state's economy by providing royalties to the state from stumpage receipts, and adding to the state's economy through wages, purchases, jobs and business.
4. To develop the area to meet multiple management objectives and enhance wildlife habitat.
5. Provide fuelwood for residential heating needs of local communities.
6. Harvesting timber from areas to reduce future developmental costs.

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 DFFP's Kenai- Kodiak Area Office filed as SC-3265-K.

IV. SCOPE OF DECISION

This Best Interest Finding (BIF) is the third part of a six-part process to design, sell, and administer timber sales. This BIF covers the sale of approximately 55 acres of Sitka spruce dominate forest.

The following list summarizes the overall process:

Part 1: Regional Planning. The Alaska Department of Natural Resources (ADNR) 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 plans. The area in this PBIF is covered by the Kenai Area Plan (2001). The finding also considers the Interagency Wildland Fire Management Plan and Kenai Peninsula Borough Community Wildfire Protection Plan (2022). The proposed area is within the Kenai Peninsula Borough, and this finding considers the Kenai Peninsula Borough Comprehensive Management Plan (2019).

Part 2: Five-year Schedule of Timber Sales (AS 38.05.113). The Kenai-Kodiak Area Office prepares a Five-year Schedule of Timber Sales (FYSTS) every other year. The Schedule identifies proposed sales, including their location, volume, and main access routes. The 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 must appear in at least one of the two Five-year Schedules preceding the sale. This timber sale has been identified in the 2026-2030 FYSTS.

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

- Establishes the overall area within which the timber sale may occur,
- Determines the amount of timber that will be offered for sale and the duration of 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 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.

Part 4: Forest Land Use Plans (AS 38.05.112). Prior to authorizing harvest of timber on any area greater than 10 acres, the DFFP must adopt a site-specific Forest Land Use Plan (FLUP) for the harvest area. DFFP will prepare a FLUP for the harvest area 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, agency and community consultation, and site-specific analyses by the DFFP, and will be subject to public and agency review.

Part 5: Timber Sales and Contracts. Following adoption of the final best interest finding, and completion of the FLUP, DFFP may offer timber for sale by auctioning competitive sales and/or negotiating some sales with purchasers. The Division will sign a contract with purchaser for the sale. The contract will include stipulations to ensure compliance with the best interest finding, FLUP, and statutory requirements.

Part 6: Sale Administration. DFFP 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 sale area covers state land near milepost 2 of Nash Road in Seward. The legal description of this proposed sale is Township 1 North, Range 1 West, Section 36. The area is on the United State Geological Survey 1:63.360 Quadrangle maps titled Seward A-7.

Sawmill Creek (AWC 231-30-10096) is west of the timber sale area which flows into Resurrection Bay. The area's Alaska Native regional corporation is Cook Inlet Regional Inc. and has adjacent property. Qutekcak Native Tribe is the nearest native group.

The attached map in Appendix A depicts the sale units.

B. Title status

The proposed sale area is owned and managed by the State of Alaska Department of Natural Resources. The land is part of State Patent 1221953. There are no known title restrictions.

C. Land use planning, classification, and management intent

The proposed sale area is within the Kenai Area Plan (KEAP Unit 450 and Unit 364A). The land use classifications include Settlement and Resource Management – High Value.

-KEAP Unit 450 (Unit 1) management intent includes the following information applicable to the proposed sale area:

- Manage unit consistent with Settlement designation.
- Maintain retention area from trail.
- Forestry riparian standards apply (AS 41.17.115 and AS 41.17.118) for riparian areas adjacent to anadromous and high value resident fish streams.
- DFFP will consult DMLW and ADF&G during agency review of the draft FLUP.

The unit is relatively flat terrain along tributaries of Sawmill Creek with potential for development. Parts of the unit are prone to flooding from Sawmill Creek.

-KEAP Unit 364A (Unit 2) management intent includes the following information applicable to the proposed sale:

- Manage unit consistent with Resource Management – High Value designation.
- Maintain retention area from trail.
- Forestry riparian standards apply (AS 41.17.115 and AS 41.17.118) for riparian areas adjacent to anadromous and high value resident fish streams.
- DFFP will consult DMLW and ADF&G during agency review of the draft FLUP.

There is evidence of salvage cutting of trees in Sawmill Creek accumulated from the fall 1995 flood. DOTPF materials site # MS-495-396-1 is in this unit.

The Interagency Fire Management Plan designated these lands in the Critical protection category.

No specific forestry/timber harvest requirements are stated in the Kenai Peninsula Borough Comprehensive Plan.

D. Current access and land use:

The sale area is accessed from the north side of Nash Road. Located east of the Sawmill Creek bridge, this access point is also used as a trailhead by the public for recreation. The Kenai Peninsula Borough Seward-Bear Creek Flood Service Area has an active material sale contract to obtain gravel from Sawmill Creek (ADL 233112). A footbridge crosses the unnamed stream. Non-designated campsites are scattered throughout the proposed sale area.

E. Background and description of proposal

1. Background: The demand for state timber is significant in Southcentral Alaska with the degree of sawtimber impacted by a spruce beetle outbreak. With limited Forestry classified land on the Kenai Peninsula, there is opportunity to harvest timber that will be economically beneficial to the state by coordinating with DMLW Land Sales Section. A right-of-way permit was issued in 1984 to Division of Forestry for winter access to the “River View” timber sale along the trail segment (ADL 217939). The Nash Road timber sale is intended to make use of state-owned saw timber, improve trail conditions for recreation, and assist in developing land for multiple management objectives.
2. Timber volume and sustained yield: The project area has an estimated volume of 829 MBF on 55 acres of forested land. The annual allowable harvest for timber in the KEAP is 455 acres/year. This sale will be within the Annual Allowable Cut (AAC) for the management area. The AAC is the amount that can be harvested from forest land managed for forestry purposes in a year under sustained yield management. Settlement and Resource Management designations in the KEAP contribute to the AAC determination.
3. Harvest unit design: The sale area will be designed with 50-foot retention areas from the trail, private ownership, and municipal entitlement. Due to flat topography, the harvest will not impact any scenic viewshed. Riparian areas adjacent to the creek will be maintained. Unit perimeters will be uneven to give the sale a mosaic pattern. Snags, cottonwood, western hemlock, and pole sized Sitka spruce (<9” DBH) will also be retained.
 - 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) unless it is converted to another use. DFFP will conduct post-harvest reforestation inspections of all areas of commercial timber harvest to ensure that the stocking level meets or exceeds FRPA reforestation requirements.

Natural regeneration is the preferred regeneration method for this sale, and it is anticipated that adequate stocking levels will be achieved within five years after harvest.

Logging operations disturb the vegetative mat, break down residual slash, expose the area to more sunlight which warms the soil, accelerates decomposition and will provide a more receptive seed bed for new growth. Sitka spruce is a moderately shade tolerant species and opening the stand canopy with the proposed harvest method is expected to improve natural regeneration of Sitka spruce. The opportunity to supplement the area with planting Sitka spruce seedlings will also be considered.

- b. Access design and construction: Access design, construction, and maintenance will comply with the Forest Resources and Practices regulations (11 AAC 95.285-.355).
 - The proposed access will be an all-season road, beginning at Nash Road and following the existing trail. The installation of a culvert at the stream will provide long term safe access to the area (see map in Appendix A).
 - The access will pass through the ROW easement of Resurrection Bay LLC property's northwest corner (previously known as the Darling property).
 - Temporary spur roads will branch from the all-season road into each unit.
- c. Appraisal method: DFFP will appraise the timber value in compliance with 11 AAC 71.092. The sale will be appraised using similar sales from Alaska Forest Resources and Practices Region I, Kenai-Kodiak area forest inventory data collected by Terra Verde, and field sample plots. The minimum bid required by the state must meet the cost of the administration of the timber sale contract after purchase.

F. Resources and management

1. Timber

- a. Timber stand composition and structure:

The proposed harvest area is Sitka spruce dominant. The mature spruce component seems to be residual from a past timber harvest in the 1960's and some of this timber has significant visual defects. The immature spruce component, with less defect, will contribute to the local saw log market and provide the focus of the sale volume. Stand composition for each unit will be described in the sale FLUP.

The understory is composed mainly of alder, devil's club, ferns, and mosses.

- b. Stand Silvics:

The stand is composed of primarily Sitka spruce and black cottonwood with western hemlock sparsely present throughout. This stand shows historic evidence of flooding and most likely developed following a shift in the main channel of Sawmill Creek.

The even-age harvest method and the declining mature cottonwood will allow for sunlight to reach the forest floor promoting Sitka spruce regeneration. Other understory species will benefit from harvest methods and continue to be a component of the stand such as devils club, blueberry, ferns and mosses.

- 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 area is situated on relatively flat terrain (0-10% slope) with a slight southwestern aspect with elevations ranging from 50 feet to 150 feet above sea level. Small intermittent drainages are present in the harvest units.

Though alluvial deposits from past flooding and colluvial deposits along the mountain base are present, some areas are covered with a thick accumulation of organic material. The soils are described as very poorly drained, loamy-skeletal textured Cryosaprists, formed from many kinds of plant materials, including wood, moss, grass, and herbaceous materials (NRCS).

2. Agriculture.

There are currently no agricultural uses of the state-owned land in the sale area or adjacent properties.

3. Wildlife habitat and harvest.

Wildlife typical of the Kenai Peninsula are found in the proposed harvest area including moose, black bear, brown bear, grouse, red squirrel, and lynx. No bear dens were identified in the harvest areas during the reconnaissance and timber cruise of either unit. There are no known raptor nests within the proposed area. If an eagle nest tree is discovered in the sale area, it will be marked on the ground, and a 330-foot no-harvest radius will be established to protect the area.

Timber harvest creates forest diversity by creating a successional multispecies stand. The proposed treatments of these stands are expected to enhance habitat conditions for ruffed grouse, moose, and small furbearers, ultimately increasing the food source for predators.

Snags will be retained to provide wildlife habitat for cavity-nesting birds, woodpeckers, small mammals, and other species. The units will be laid out with uneven edges with cottonwood, small diameter spruce, and hemlock also retained throughout the units to provide cover for larger wildlife.

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). As required by AS 41.17.098, DFFP provides due deference to ADF&G to ensure all fish and wildlife habitat issues are addressed by the proposed timber sale design. DFFP provides due deference to the Alaska Department of Environmental Conservation (ADEC) for all water quality issues.

The riparian retention area between the harvest area and Sawmill Creek (AWC 231-30-10096), along with the flat topography, will greatly reduce the likelihood of introducing sediment into the creek.

The stream crossing used to access the proposed harvest areas connects Sawmill Creek to unnamed stream 231-30-10104-2001 (see attached map in Appendix A). This crossing was inspected by ADF&G for fish habitat prior to completion of the BIF.

5. Recreation, tourism, and scenic resources.

The existing trail is used for recreation throughout the year. Off-road highway vehicles (OHV's), hiking, biking, cross country skiing, and hunter access are the most common forms of recreation for the area.

Installation of a culvert, along with trail grading and brushing, is expected to have a positive long-term effect on the trail system. For safety reasons, harvest activities may temporarily restrict or modify access routes to the area while harvest operations are ongoing. The restrictions will be short in nature with prior public notice provided and associated signage for safety.

6. Cultural Resources.

DFFP works with the Office of History and Archeology (OHA), who serves as the State Historic Preservation Office (SHPO) to identify and avoid known cultural, historic and archeological sites in planning the proposed access routes and harvest areas. If additional sites are identified, DFFP will immediately inform SHPO and take action to protect the findings. Harvest operations will be appropriately adjusted to avoid conflicts.

The proposed access into the sale area is adjacent to a series of uneven berms, ditches and pits. The features are reported to be historic flood diversion efforts by the residents of Seward (AHRs - SEW-01310).

The trail segment was associated with the Kenai Lumber Company as early as the 1960's and may be a recent trail used to connect to the Forest Service Iditarod commemorative trail system but not historically associated with the Iditarod National Historic Route (AHRs - SEW-01191). The sale area will have a 50-foot retention area from the trail segment.

7. Subsurface Resources. There is no known current mining activity in the proposed sale area.

G. Costs and benefits

In addition to timber revenue generated from stumpage to the State, the proposed sale will create economic benefits to the Kenai Peninsula Borough and to other locations in Alaska. The local business community will receive direct economic benefits from providing support services to the operators through sales of fuel, food, housing, and miscellaneous supplies. This timber sale will have a positive impact on statewide employment by generating work directly associated with the harvest and wood processing of the timber from this sale.

The current market for high value-added forest products includes rough cut lumber and cabin logs. Kiln-dried lumber for construction, flooring, trim, paneling, novelty wood products, cabinetry, and furniture may also be produced from the timber.

VI. PUBLIC REVIEW

The PBIF was publicly noticed in compliance with AS 38.05.945. Notice was posted on the Alaska Online Public Notice System on March 17, 2026. Notices were also posted at the Kenai Peninsula Borough Libraries. Mailed notices were distributed to a mailing list maintained by the Kenai-Kodiak Area Office and public notices were sent to Kenai Peninsula Borough post offices.

VII. PUBLIC COMMENT

DFFP received agency comments from ADF&G, DMLW, ADEC and USFS on the Preliminary Best Interest Finding. Public comment was received from 15 individuals and the Qutekcak Native Tribe.

The comments are summarized in Appendix D. The comment structure is based on the resources discussed in the Preliminary Best Interest document and the topics emphasized by commenters. Full comments from federal and state agencies are attached below the matrix in Appendix D.

VIII. RECOMMENDATION AND DECISION

After due consideration of all pertinent information, the ADNR has reached the following preliminary decision: to offer for sale approximately 55 acres of Sitka spruce from state owned land to provide saw timber from Settlement and Resource Management classified lands. DFFP 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

Diane Campbell

Digitally signed by Diane
Campbell
Date: 2026.10.12 09:56:45 -08'00'

Diane Campbell, Kenai-Kodiak Area Forester
Alaska Division of Forestry & Fire Protection

Date

X. RECONSIDERATION

An eligible person affected by this decision of the department, and who provided timely written comment or public hearing testimony to the department, may request reconsideration to the DNR Commissioner per AS 44.37.011 and 11 AAC 02. Any request for reconsideration must be received by the Commissioner's Office within twenty (20) calendar days after issuance of the decision under 11 AAC 02.040. The Commissioner may order or deny a request for reconsideration within thirty (30) calendar days after issuance of the decision. If the Commissioner takes no action on a request for reconsideration within thirty (30) days after issuance of the decision, the request for reconsideration is considered denied. The Commissioner's decision on reconsideration, other than a remand decision, is a final administrative order and decision of the department. An eligible person must first request reconsideration to the Commissioner before seeking relief in superior court. The Alaska State Courts establish its own rules for timely appealing final administrative orders and decisions of the department.

Reconsideration may be mailed or hand-delivered to the DNR Commissioner's Office, 550 W. 7th Avenue, Suite 1400, Anchorage, Alaska, 99501; or faxed to (907)-269-8918 or sent by electronic mail to dnr.appeals@alaska.gov. Reconsideration must be accompanied by the fee established in 11 AAC 05.160(d)(1)(F), which has been set at \$200 under the provisions of 11 AAC 05.160(a)-(b).

If no request for reconsideration is filed by that date, this decision goes into effect as a final order and decision 30 days after signature.

A copy of 11 AAC 02 is enclosed and is also available on the department's website at <https://dnr.alaska.gov/mlw/pdf/DNR-11-AAC-02.pdf>.

If you have any questions, please contact Diane Campbell, Kenai-Kodiak Area Forester, diane.campbell@alaska.gov, (907) 260-4210.

X. APPENDICES

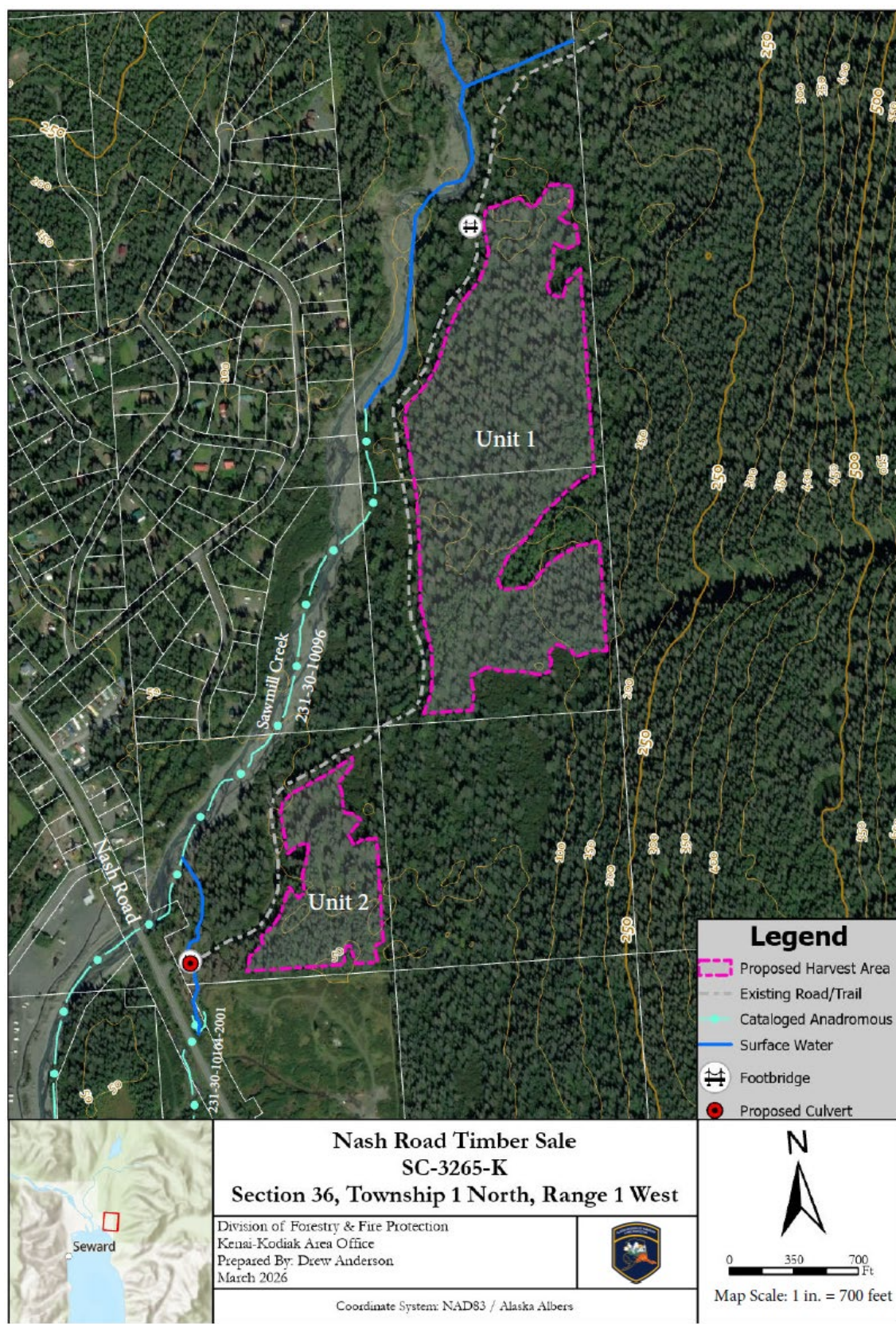
Appendix A SC-3265-K Nash Road Timber Sale Maps

Appendix B References

Appendix C Appeal Regulations

Appendix D SC-3265-K Nash Road Timber Sale Comments and Responses

Appendix A SC-3265-K Nash Road Timber Sale Maps





Legend

- Proposed Harvest Area
- Existing Road/Trail
- Cataloged Anadromous
- Surface Water
- Footbridge
- Proposed Culvert



Nash Road Timber Sale Access
SC-3265-K
Section 36, Township 1 North, Range 1 West

Division of Forestry & Fire Protection
 Kenai-Kodiak Area Office
 Prepared By: Drew Anderson
 March 2026

Coordinate System: NAD83 / Alaska Albers

N

0 55 100
Ft

Map Scale: 1 in = 100 feet

Appendix B References

Alaska Department of Natural Resources, Division of Mining Land and Water, Alaska Mapper. Retrieval from: <https://soa-dnr.maps.arcgis.com/home/index.html>

Alaska Department of Natural Resources, Division of Mining Land and Water, Land Administration System. Retrieval from: <http://dnr.alaska.gov/landrecords/>

Burns, Russell M., and Honkala, Barbara H., 1990. *Silvics of North America, Volume 1. Conifers*. Agriculture Handbook 654. USDA Forest Service, Washington, D.C.

Deal, Robert L., Management strategies to increase stand structural diversity and enhance biodiversity in coastal rainforests of Alaska, *Biological Conservation*, Volume 137, Issue 4, 2007, Pages 520-532.

Harris, Arland S.; Farr, Wilbur A. 1974. The forest ecosystem of southeast Alaska: 7. Forest ecology and timber management. Gen. Tech. Rep. PNW-GTR-025. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 116 p

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Soil Survey Staff. (2015). *Illustrated Guide to Soil Taxonomy, Version 2*. U.S. Department of Agriculture, Natural Resources Conservation Service, National Soil Survey Center, Lincoln, Nebraska.

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.

11 AAC 02 Regulations

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.

11 AAC 02.015. Combined decisions.

- (a) When the department issues a combined decision that is both a final disposal decision under AS 38.05.035(e) and any other decision, including a disposal decision combined with a land use plan decision, or a disposal decision to grant certain applications combined with a decision to deny others, the appeal process set out for a disposal decision in AS 38.05.035(i) - (m) and this chapter applies to the combined decision.
- (b) Repealed 12/27/2012.

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 BIF Tuxekan Timber Sale SSE-1392-K 20 | Page 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.

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, facsimile transmission, or electronic mail;
- (3) be signed by the appellant or the appellant's attorney, unless filed by electronic mail; an appeal or request for reconsideration filed by electronic mail must state the name of the person appealing or requesting reconsideration and a single point of contact to which any notice or decision concerning the appeal or request for reconsideration is to be sent;
- (4) be correctly addressed;
- (5) be timely filed in accordance with 11 AAC 02.040;
- (6) specify the case reference number used by the department, if any;
- (7) specify the decision being appealed or for which reconsideration is being requested;
- (8) specify the basis upon which the decision is challenged;
- (9) specify any material facts disputed by the appellant;
- (10) specify the remedy requested by the appellant;
- (11) state the address to which any notice or decision concerning the appeal or request for reconsideration is to be mailed; an appellant may also provide a telephone number where the appellant can be reached during the day or an electronic mail address; an appeal or request for reconsideration filed electronically must state a single address to which any notice or decision concerning the appeal or request for reconsideration is to be mailed;
- (12) identify any other affected agreement, contract, lease, permit, or application by case reference number, if any;
- (13) include a request for an oral hearing, if desired; in the appeal or request for reconsideration, the appellant may include a request for any special procedures to be used at the hearing; the appeal or request for reconsideration must describe the factual issues to be considered at the hearing; and
- (14) be accompanied by the applicable fee set out in 11 AAC 05.160.

(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 requirements 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 may ask for a stay as part of the appeal or request for reconsideration. The appellant must include an argument as to why public interest requires a stay.

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).

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.

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.

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.

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.

Appendix D SC-3265-K Nash Road Timber Sale Comments and Responses

Nash Road SC-3265-K PBIF Public and Agency Comments and Responses		
Commenter	Topic	Response
	General Support of Sale	
Michael Dale; Chad Dyer, Elite Real Estate Group Wasilla; Christy Edmonds; Ryan Fischer; Derek Galbraith, Serendipity Log Works; Mike Gillis; Nathan Kohlhase, Ace Construction LLC; Linn McCabe; Dan Owens; Andrew Traxler, Papoose Milling	Please approve the Nash Road timber sale. I support the Nash Road timber sale.	Comments have been noted
State Legislators: Representative Kevin McCabe and Senator George Rauscher	Strongly support the proposed timber sale	Comments have been noted.
Jennifer Youngblood, Chugach National Forest Supervisor, USDA Forest Service	The USDA Forest Service (FS) supports the proposal of this sale	Comment has been noted

Emerson Krueger, Natural Resource Manager, Matanuska-Susitna Borough	Support the proposed sale We are seeing limited amounts of backhaul between the Mat-Su area and the Kenai when local birch firewood is backhauled. Our organizations should coordinate to the extent practicable to create more opportunities for local businesses to bring our local products to an expanded market.	Comment has been noted. DFFP is available for coordination with the Matanuska-Susitna Borough
	Fisheries, Habitat and Water Quality	
Qutekcak Native Tribe	- Detailed watershed review for impacts to salmon-bearing systems and downstream fisheries - Full evaluation of wildlife habitat fragmentation and migration corridor impacts - Clear mitigation measures for erosion control, riparian protection and long-term habitat recovery	Streams and habitat impacts are reviewed by ADF&G and will be addressed in the Forest Land Use Plan. Timber harvest is not proposed in the area between Sawmill Creek and the trail, which will remain as a riparian retention area. Erosion control and riparian protection are addressed under FRPA regulations and specifics will be included in the Forest Land Use Plan.
Brock Tabor, Special Projects Coordinator, DEC	No comments at this time	Communication has been noted
Kaitlynn Cafferty, Habitat Biologist, ADF&G	Suggest the following edit to the Fish Habitat, water resources and water quality section: "The stream crossing used to access the proposed harvest areas connects Sawmill Creek to unnamed stream 231-30-10104-2001. This crossing will be inspected by ADF&G for fish presence. If fish are documented in the vicinity of the stream crossing, then a Fish Habitat Permit will be obtained from ADF&G Habitat Section prior to culvert installation	Comments noted and this language will be included in the Forest Land Use Plan.

Kevin Husa, Natural Resource Specialist, DMLW - RADS	Kenai Area Plan Chapter 2 Guidance, Trails and Access section. Per Section C paragraph 1 stream crossings should be minimized. Those in anadromous fish habitat require an ADFG permit. When a stream must be crossed to construct a road, the crossing should be as close as possible to a 90-degree angle to the stream, consistent with good road alignment practices. Stream crossings should be made at stable sections of the stream channel.	Comment noted and specifics will be addressed in the Forest Land Use Plan. ADF&G will continue to be consulted in the development of the Forest Land Use Plan.
Kevin Husa, Natural Resource Specialist, DMLW - RADS	Consult with ADF&G for guidance and required permits crossing Sawmill Creek.	Sawmill Creek will not be crossed; the proposed crossing is of a stream that connects Sawmill Creek to unnamed stream 231-30-10104-2001. DFFP will continue to consult with ADF&G in the development of the Forest Land Use Plan.
Cumulative Environmental Effects		
Qutekcak Native Tribe	Consideration of cumulative environmental effects beyond immediate harvest boundaries.	The Kenai Area Plan considered land use at the landscape level for the Kenai Peninsula and determined that priority use of these two units would be fore Settlement (Unit 450) and Resource Management – High Value (Unit 364A) The DNR perspective additionally considers the very limited activity planned for the foreseeable future on surrounding federal lands.

	Government to Government Consultation	
Qutikcak Native Tribe	Qutekcak Native Tribe respectfully requests that direct Tribal consultation occur prior to any Final Decision where State actions may affect traditional use areas, subsistence resources, watershed conditions, or habitat relied upon by Tribal communities.	Government-to-government consultation is a deliberative federal process required by federal laws and Executive Orders based on a unique legal relationship between the federal government and Tribes. While there is not a government-to-government process under Alaska law, DNR recognizes the importance of collaboration when managing natural resources. DFFP is available to meet with Qutekcak Native Tribe regarding this timber sale and will reach out to coordinate a meeting outside of a government-to-government consultation to address concerns.

	Access	
Qutekcak Native Tribe	Protection of subsistence access routes and traditional gathering areas	DFFP will consult with DMLW and the USDA Forest Service in the development of the FLUP so that access improvements for the timber sale support the long-term management goals for the trail. In the short term, for safety reasons, timber harvest activities may temporarily restrict or modify access routes to the area. The restrictions will be short in nature with prior public notice provided and associated signage for safety.
Emerson Krueger, Natural Resource Manager, Matanuska-Susitna Borough	It would seem appropriate to indicate the spur roads developed to yard the timber to the primary access would be put to bed or otherwise blocked post-harvest, given the recreation pressure and the number of abandoned vehicles in the area.	Close-out of spur roads will be addressed in the Forest Land Use Plan in cooperation with DMLW to meet long-term management goals.
Kaitlynn Cafferty, Habitat Biologist, ADF&G	Suggestion to clarify that the “50’ foot retention area from the trail” is intended as 50’ measured from the trail centerline. The 2000 Kenai Area Plan identifies the Iditarod national Historic Trail as a trail of regional or statewide significance and recommends a minimum 100-foot corridor (50 feet on each side of center line) for such trails. Including this clarification would help keep the PBIF consistent with the plan and avoid possible confusion about buffer width in future project stages.	Correction noted. The Forest Land Use Plan will describe the retention area as 50’ each side of the center line.

Kevin Husa, Natural Resource Specialist, DMLW - RADS	Kenai Area Plan Chapter 2 Guidance, Trails and Access Section, Per the second paragraph of section D of the Trails and Access Section. When DNR conveys lands or issues authorizations along the INHT, the authorization or conveyance will be subject to the route (or alternate route) and a buffer along the route that ensures continuous trail links along the INHT. The route will be protected by a 1,000-foot-wide corridor (500 feet on each side of the centerline). This corridor width is the same as the easement reserved by BLM and the US Forest Service before land was patented to the state. This width allows flexibility to reroute the trails within the corridor, separate motorized and nonmotorized uses on individual trail within the corridor and includes a visual and sound buffer between the recreation corridor and adjacent uses. To minimize potential land use conflicts or the impact of the trail's existence on adjacent land uses, the corridor width may be expanded or reduced. These width adjustments, as well as rerouting of the trail corridor, may be permitted in specific instances with the consultation of the KPB. Kenai Area Plan Chapter 3 Guidance, Unit Specific Management Intent. The Iditarod National Historic Trail (INHT) runs through both units. The chapter 2 Trails and Access section states that when DNR conveys land or issues authorizations along the INHT, the authorization or conveyance will be subject to the route (or alternate route) and a buffer along the route that ensures continuous trail links along the INHT. The route will be protected by a 1,000-foot-wide corridor (500 feet on each side of centerline).	This decision is for the sale of timber. DNR is not conveying land or issuing an authorization as part of this decision. Trail connectivity will not be affected by the timber sale. DFFP will consult with DMLW and the USDA Forest Service in the development of the FLUP so that access improvements for the timber sale support the long-term management goals for the trail. DMLW issued a concurrence memo for the proposed timber harvest, noting its consistency with the Kenai Area Plan.
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Jennifer Youngblood, Chugach National Forest Supervisor, USDA Forest Service	Our request is that DOF and the FS continue working to evaluate and clearly define timber sale access to avoid and minimize impacts to the INHT. While the existing trail is regularly traveled via off-highway vehicles for recreation purposes, it is currently not built at a specification designed to accommodate highway vehicles, log truck, skidders, or other equipment that may be used to support a timber sale. We ask that DOF coordinate with Chugach National Forest to define what class of vehicles will be permitted to use the trail, and to define trail rehabilitation standards for operators as they complete and remediate the sale area when trail access is no longer needed. We also ask that DOF consider identifying additional access locations to timber sale units that do not require use of the trail for timber harvesting activities. This analysis and defined standards would be consistent with stipulation 2, “Reservation and Grant of Rights” in the 2004 decision establishing the FS easement ADL228890, which establishes that DNR may authorize other uses along the trail, so long as they do not interfere with the rights granted to the FS.	Alternative access is constrained by Sawmill Creek and adjacent private land. Access along the trail is proposed because the unrestricted easement across private property is the only legal access to Unit 1 that does not require crossing Sawmill Creek. DNR records indicate the trail was used in the 1980s to access a joint State-Forest Service timber sale. DFFP will continue to coordinate with the Chugach National Forest and DMLW in the development of the FLUP so that access improvements for the timber sale support the long-term management goals for the trail.
	Method of Sale	
Andrew Traxler, papoose Milling	Please make this sale outcry auction not sealed bid. I will not send money to the auction if sealed bid. No timber should ever be sold under sealed bid.	Comment has been noted
	Land Use Classification	
Kevin Husa, Natural Resource Specialist, DMLW - RADS	The proposed timber sale site is in the KEAP within units 364A and 450. Unit 364A is designated as Resource Management – high value (rh) which converts to the classification of Resource Management land. Unit 450 is designated as Settlement (Se) and converts to the classification of Settlement Land.	Comment noted, no change required.

Kevin Husa, Natural Resource Specialist, DMLW - RADS	Timber harvest activities must be compatible with the guidelines in this section and the management intent statements and land-use designations identified for each unit in Chapter 3.	Comment noted, no change required. DMLW issued a concurrence memo for the proposed timber harvest, noting its consistency with the Kenai Area Plan.
Kevin Husa, Natural Resource Specialist, DMLW - RADS	Recommendation: Review and comply with all KEAP guidelines as well as that from the Alaska forest Resources & Practices Act.	Comment noted, no change required. DMLW issued a concurrence memo for the proposed timber harvest, noting its consistency with the Kenai Area Plan.
Land Use Conversion		
Emerson Krueger, Natural Resource Manager, Matanuska-Susitna Borough	It would be helpful if the coordination with DMLW would bring some resolution to the potential for a land use conversion, as a conversion may reduce the effort required to support reforestation.	DMLW does not have immediate plans for land use conversion of the timber sale area. The sale area will be reforested in compliance with FRPA, with natural regeneration as the preferred method. The DFFP will continue to coordinate with DMLW in the development of the FLUP

	Wildland Urban Interface	
Emerson Krueger, Natural Resource Manager, Matanuska-Susitna Borough	The location appears to be in the wildland-urban interface. Is reducing the wildfire hazard within a critical protection area a valid purpose for a sale?	The sale location is within the wildland-urban interface, and timber harvest will reduce fuels for a period of time as the forest regenerates and matures. Wildfire hazard reduction is one outcome of the sale but not the purpose.

Campbell, Diane M (DNR)

From: Cafferty, Kaitlynn L (DFG)
Sent: Monday, April 27, 2026 2:39 PM
To: Campbell, Diane M (DNR)
Subject: Re: Preliminary Best Interest Finding Kenai-Kodiak Nash Road (SC-3265K)
Attachments: dji_fly_20260423_124528_697_1776977233691_photo_optimized.JPEG

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Diane,

Thanks for the opportunity to review.

Please see ADF&G's Comments for the PBIF below:

1. As a suggestion, you may want to clarify that the "50-foot retention area from the trail" is intended as 50 feet measured from the trail centerline. The 2000 Kenai Area Plan identifies the Iditarod National Historic Trail as a trail of regional or statewide significance and recommends a minimum 100-foot corridor (50 feet on each side of centerline) for such trails. Including this clarification would help keep the PBIF consistent with the plan and avoid possible confusion about buffer width in future project stages.
2. I would suggest the following edit to the Fish Habitat, water resources, and water quality section: "The stream crossing used to access the proposed harvest areas connects Sawmill Creek to unnamed stream 231-30-10104-2001 (see attached map in Appendix A). This crossing will be inspected by ADF&G for fish **presence**. **If fish are documented in the vicinity of the stream crossing, then a Fish Habitat Permit will be obtained from ADF&G Habitat Section prior to culvert installation.** ~~habitat prior to culvert installation.~~"

Feel free to reach out with any clarifying questions. On another note-we captured rainbows and coho in the stream on DNR's property last week- underneath all the ice! I attached a drone photo. Seems like the restoration treatments are mostly doing their job for now.

Thanks,

Kaitlynn Cafferty (she/her)
Kenai Peninsula Area Manager
ADF&G Habitat Section
(907)953-3040
[ADF&G Habitat Section Permitting](#)



STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES
Division of Mining, Land and Water

"Putting Alaska's resources to work - now and in the future!"

MEMORANDUM

DATE: April 9, 2026
TO: Diane Campbell, Kenai Kodiak Area Forester
Division of Forestry and Fire Protection
FROM: Kevin Husa, NRS
Resource Assessment & Development Section
SUBJECT: RADS Agency Review, Kenai-Kodiak Nash Road SC-3265K

Thank you for the opportunity to review and comment on the proposed Kenai-Kodiak Nash Road SC-3265K. The Resource Assessment & Development Section (RADS) has reviewed the available data, satellite imagery, and the Kenai Area Plan (KEAP) and provides the following comments.

Background & Discussion:

The Division of Forestry and Fire Protection (DFFP) is proposing to offer approximately 55 acres of Sitka spruce saw logs from state lands near milepost 2 of Nash Road in Seward (see Appendix A, Nash Road Timber Sale Map). Unit 1 will be 45 acres, and Unit 2 will be 10 acres. The volume to be offered totals approximately 829 MBF (1,974 CCF). DFFP would sell the timber as a sealed bid for commercial use under provisions of AS 38.05.120. For this timber sale, a Draft Forest Land Use Plan (FLUP) will also be issued for review.

The management objectives for the proposed timber sale 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 public interest.
2. To provide state timber for production of wood products for commercial and personal use.
3. To help the state's economy by providing royalties to the state from stumpage receipts, and adding to the state's economy through wages, purchases, jobs and business.
4. To develop the area to meet multiple management objectives and enhance wildlife habitat.
5. Provide fuelwood for residential heating needs of local communities.
6. Harvesting timber from areas to reduce future developmental costs.

KEAP Chapter 2 Guidance

Forestry Section

Management Guidelines:

The Forest Resources and Practices Act (AS 41.17) and Regulations (11 AAC 95) provide statewide policy and guidance for managing forestry related activities. Site-specific guidelines for forestry management activities will be addressed through the Forest Land Use Plan prior to any commercial timber sale or harvest (AS 38.05.112). Timber harvest

activities must be compatible with the guidelines in this section and with the management intent statements and land-use designations identified for each unit in Chapter 3.

Trails and Access Section

Per Section C paragraph 1 stream crossings should be minimized. Those in anadromous fish habitat require an ADFG permit. When a stream must be crossed to construct a road, the crossing should be as close as possible to a 90-degree angle to the stream, consistent with good road alignment practices. Stream crossings should be made at stable sections of the stream channel.

Per the second paragraph of section D of the Trails and Access Section. When DNR conveys lands or issues authorizations along the INHT, the authorization or conveyance will be subject to the route (or alternate route) and a buffer along the route that ensures continuous trail links along the INHT. The route will be protected by a 1, 000-foot-wide corridor (500 feet on each side of the centerline). This corridor width is the same as the easement reserved by BLM and the US Forest Service before land was patented to the state. This width allows flexibility to reroute the trails within the corridor, separate motorized and nonmotorized uses on individual trails within the corridor and includes a visual and sound buffer between the recreation corridor and adjacent uses. To minimize potential land use conflicts or the impact of the trail's existence on adjacent land uses, the corridor width may be expanded or reduced. These width adjustments, as well as rerouting of the trail corridor, may be permitted in specific instances with the consultation of the KPB.

KEAP Chapter 3 Guidance

Unit Specific Management Intent

The proposed timber sale site is in the KEAP within units 364A and 450. Unit 364A is designated as Resource Management- high value (rh) which converts to the classification of Resource Management Land. Unit 450 is designated as Settlement (Se) and converts to the classification of Settlement Land. The Iditarod National Historic Trail (INHT) runs through both units. The chapter 2 Trails and Access section states that when DNR conveys lands or issues authorizations along the INHT, the authorization or conveyance will be subject to the route (or alternate route) and a buffer along the route that ensures continuous trail links along the INHT. The route will be protected by a 1, 000-foot-wide corridor (500 feet on each side of the centerline).

Alaska Forest Resources & Practices Act

The Alaska Forest Resources & Practices Act AS 41.17 and Regulations 11 AAC 95 will apply to this project.

Recommendation:

Review and comply with all KEAP guidance as well as that from the Alaska Forest Resources & Practices Act. Consult with ADF&G for guidance and required permits crossing Sawmill Creek. Thank you for the opportunity to review.



File Code: 2350

Date: May 5, 2026

Diane Campbell
Area Forester, Kenai-Kodiak Area Office
Division of Forestry and Fire Prevention
State of Alaska - Division of Natural Resources
diane.campbell@alaska.gov

Dear Ms. Cambell:

Please accept these comments from the Chugach National Forest, on the Alaska Department of Natural Resources, Division of Forestry and Fire Prevention's (DOF) Preliminary Written Finding under AS 38.05.945(a)(3) and AS 38.05.035(e) for the Nash Road Timber Sale (SC-3265K).

The USDA Forest Service (FS) supports the proposal of this sale offering approximately 55 acres of Sitka spruce saw logs from state lands near milepost 2 of Nash Road in Seward with Unit 1 being 45 acres and Unit 2 being 10 acres with a total volume offered of 829 MBF (1975 ccf).

The FS wishes to comment on concerns around management of the section of the Iditarod National Historic Trail (INHT) which starts at Nash Road in alignment with the 1986 Comprehensive Management Plan for the INHT.

In 2004, the FS applied for an easement for portions of the INHT that cross State land in the area between Seward and Girdwood and the temporary easement was maintained until 2020, during COVID, at which time the easement expired. The FS is actively working with DNR's Southcentral Regional Land Office to renew the temporary easement authorization and subsequently apply for a permanent trail easement.

Future FS work in the area will include the construction of a new trailhead with increased visitor amenities, as funding allows. This is also important work to both the state and the forest to provide exceptional visitor experiences in South Central Alaska.

Therefore, our request is that DOF and the FS continue working together to evaluate and clearly define timber sale access to avoid and minimize impacts to the INHT. While the existing trail is regularly traveled via off-highway vehicles for recreation purposes, it is currently not built at a specification designed to accommodate highway vehicles, log truck, skidders, or other equipment that may be used to support a timber sale. We ask that DOF coordinate with Chugach National Forest to define what class of vehicles will be permitted to use the trail, and to define trail rehabilitation standards for operators as they complete and remediate the sale area when trail access is no longer needed. We also ask that DOF consider identifying additional access locations to timber sale units that do not require use of the trail for timber harvesting activities. This analysis and defined standards would be consistent with stipulation 2, "Reservation and Grant of Rights" in the 2004 decision establishing the FS easement ADL 228890, which establishes that DNR may authorize other uses along the trail, so long as they do not interfere with the rights granted to the FS.

