

STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES



SOUTHEAST AREA

**BEST INTEREST FINDING AND FOREST LAND
USE PLAN FOR
KOSCIUSKO EAST TIMBER SALE
SSE-1384-K**

February 2024

Abbreviations

ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
BIF	Best interest finding
DMLW	Division of Mining, Land and Water
DOF	Division of Forestry and 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
POG	Productive old growth
POW	Prince of Wales (Island)
POWIAP	Prince of Wales Island Area Plan
ROW	Right-of-way
SESF	Southeast State Forest
SESFMP	Southeast State Forest Management Plan
SHPO	State Historic Preservation Office
UA	University of Alaska
USFS	United States Forest Service

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I. PROPOSED ACTION

The Division of Forestry and Fire Protection (DOF) is proposing to offer for sale approximately 186 acres of old-growth timber composed of western hemlock (*Tsuga heterophylla*), Sitka spruce (*Picea sitchensis*), western red cedar (*Thuja plicata*) and Alaska yellow cedar (*Chamaecyparis nootkatensis*) from state lands in the vicinity of Edna Bay on Kosciusko Island. The volume to be offered totals approximately 7 million board feet. DOF would sell the timber as one large sale under AS 38.05.120 AS 38.05.120 for commercial use.

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 (Article 8.1), making them available for maximum use consistent with the public interest.
2. To support the State's economy by providing royalties to the State in the form of stumpage receipts, and infuse the State's economy through wages, purchases, jobs, and business.
3. To help sustain the forest products sector in the SE Alaska economy, and to support the local economies of the communities within southern Southeast Alaska by creating additional jobs through road building, logging, trucking and potentially milling.

II. STATUTORY AND REGULATORY AUTHORITY

The Division is taking this action under the authority of

- AS 38.05.035(e) Best Interest Finding;
- AS 38.05.110-120 and 11 AAC 71, Timber Sale Statutes and Regulations; and
- AS 41.17.010-950 and 11 AAC 95, Forest Resources and Practices Statutes and Regulations.

III. ADMINISTRATIVE RECORD

The Division will maintain an administrative record regarding the decision of whether, or not, to proceed with the action as proposed. This record will be maintained at the DOF's Southeast Area Office filed as SSE-1384-K.

IV. SCOPE OF DECISION

This Best Interest Finding (BIF) and Forest Land Use Plan (FLUP) are parts three and four of a six-part process to design, sell, and administer timber sales; for this timber sale the documents are combined into a single document. This BIF and FLUP describe the DOF's intent to sell approximately 186 acres of old growth timber composed of western hemlock, Sitka spruce, western red cedar, and Alaska yellow cedar on state land within the perimeter of the 637-acre Edna Bay East tract of the SESF. The following list summarizes the overall process:

Part 1: Regional Planning. The Department of Natural Resources develops area plans and state forest management plans to designate appropriate uses for state land, classify the land accordingly, and establish management guidelines for multiple use. These plans determine where timber sales are an allowed use, and what other uses must be considered when designing and implementing timber sales. Subsequent land use decisions must be consistent with provisions contained within the applicable area and/or forest plans. The project area in this BIF is covered by the Southeast State Forest Plan (SEAFP) and the Edna Bay Subunit 8 of the Prince of Wales Island Area Plan (POWIAP). The Land Classification of the area is a mix of Settlement, Recreation, General Use, and Habitat Lands.

Part 2: Five-year Schedule of Timber Sales (AS 38.05.113). The Southern Southeast Area Office prepares a Five-Year Schedule of Timber Sales (FYSTS) every other year. The Schedule identifies proposed sales, including their general location, approximate acreage and/or estimated timber volume, and main access routes. The FYSTS is a scoping document that provides, for each proposed timber sale, an opportunity for the public, agencies, and industry to identify potential issues and areas of interest for further consideration in the BIF process. Under AS 38.05.113, proposed timber sales within the area covered by a BIF must appear in at least one of the two FYSTSs preceding the sale. This timber sale area has been identified in documents associated with the following FYSTS 2011-2015, 2013-2017, and 2023-2027.

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

- Ensures that the best interest of the State will be served by this proposed action,
- Establishes the overall area within which the timber sale may occur,
- Determines the amount of timber that will be offered for sale and the duration of the sale,
- Sets the overall harvest and reforestation strategy for the sale area,
- Determines whether the sale proposal complies with the Constitutional requirement to manage for sustained yield by evaluating the amount of timber in the sale and the annual allowable cut for the affected area,
- Selects the appropriate method of sale (i.e., competitive or negotiated sale), and
- Determines the appraisal method that will be used to determine the sale price.

Part 4: Forest Land Use Plans (AS 38.05.112). Prior to authorizing harvest of timber on any area greater than 10 acres, the DOF must adopt a site-specific Forest Land Use Plan (FLUP) for the harvest area. For this project, the DOF has prepared a FLUP for the harvest area within the overall sale area covered by this BIF and it is attached to this BIF as Appendix E. The FLUP specifies the site, size, timing, and harvest methods for harvest units within the sale area. The FLUP also addresses site-specific requirements for access road construction and maintenance, reforestation, and multiple use management. The FLUP is based on fieldwork and site-specific analyses by the DOF in consultation with appropriate regulatory agencies. The FLUP is subject to public review.

Part 5: Timber Sales and Contracts. Following the BIF decision and the adoption of the FLUP, the DOF may offer the timber for sale (negotiated or competitive bid) using the appropriate authority. The Division will sign a contract with the purchaser for each sale. The contract will

include stipulations requiring compliance with the BIF, FLUP, and all applicable statutes and regulations.

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

V. PROJECT LOCATION, LAND STATUS, AND DESCRIPTION

A. Location

The timber sale area is found within Sections 23, 24, and 26, Township 68 South, Range 76 East, Copper River Meridian (CRM). The sale area is found within the Craig D-5 NW USGS quadrangle. See Appendix A, Kosciusko Island East Timber Sale Maps.

B. Title status

Patented to the state (patent No. 50-85-0112) under National Forest Community Grant 129 (NFCG 129).

C. Land use planning, classification, and management intent

The proposed timber sale area is located within the SESF. The State of Alaska's Division of Forestry and Fire Protection (DOF) is the land manager for all harvest units/settings within this proposed sale. The managing document is the Southeast State Forest Management Plan (SESFMP). The land proposed for harvest is managed under provisions cited in the SESFMP, adopted on February 29, 2016. The primary purpose of the state forest is, "timber management that provides for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources" (AS 41.17.200(a)). SESF lands are classified as Forest land.

Edna Bay and its vicinity is within the geographic region covered by the Prince of Wales Island Area Plan (POWIAP) revised in October 1998 and administered by the Division of Mining, Land and Water. This POWIAP covers all state land proximate to the island not within the SESF. State land covered in the POWIAP serves a variety of purposes with an emphasis on the development of the community of Edna Bay.

The Interagency Fire Management Plan includes all nonfederal lands in the modified or full protection category.

D. Current access and land use

The sale is less than one mile from the State public float plane and boat dock on the northeast side of Edna Bay on Kosciusko Island. The main access to this sale is along the federally managed 1525000 road.

Federal land on Kosciusko has seen extensive timber harvesting since the early 1940's. The USFS ownership predominates on the island for several miles to the north of the sale area, along with a significant block of Sealaska regional Native corporation land. The last significant federal timber harvest activity on the island was the 32 million board foot Kosciusko GNA timber sale located 12 miles to the west. Prior activity occurred in the early 1980's; most roads are in a storage or deferred maintenance status. The area immediately to the north of the sale was logged in the 1970's and the west side of Limestone Point and portions of the hill north of Edna Bay were logged by A-frame during WWII.

The State created the Southeast State Forest in 2010 and 2011 from lands previously classified General Use, outside the Settlement classified areas. The State has sold a variety of timber sales, in various sizes, in the area since the early 2000's. The State currently has one active timber sale in operation to the west of Edna Bay referred to as the Edna Bay Parlay II Timber Sale SSE-1342-K.

The University of Alaska (UA) and the Alaska Mental Health Trust have also conducted timber harvests on the island during the past twenty years.

In late 2014, Sealaska Corporation received conveyance from the Forest Service of approximately 11,974 acres on Kosciusko Island. This block of land is located approximately three miles to the northwest of the proposed sale area. Sealaska managed a timber harvest operation on the island for two years after conveyance but is not currently operating in the area. Sealaska Corporation has described its management intent for the property as focused on forest management. In 2018 Sealaska Corporation became the first entity in Alaska to be issued carbon-offset credits associated with its carbon sequestration projects. Since that time there has been no active commercial timber harvest operations under Sealaska Corporation ownership on Kosciusko Island.

The state subdivided the land to the west of the proposed Kosciusko East Timber Sale and sold residential lots bordering Edna Bay in the mid 1980's. The community has developed since that time and in 2014 was incorporated as the second-class City of Edna Bay. The proposed timber sale is within the municipal boundary. The petition for incorporation listed 42 people while the 2020 US Census lists 25 people in the community of Edna Bay. Comment in the PBIF indicated that the 2020 census undercounted the number of residents. The city assumed road maintenance responsibility and harbor management and has developed a community bulk fuel facility on the east side of the bay adjacent to the public floatplane dock and harbor. The USFS in 2017, through a Federal Lands Access Grant, administered the upgrade of the road surface and drainage structures on the main public road through the community in the subdivision; this road is locally referred to as the Edna Bay Community Road or the 1520 Road.

Timber has been transferred from Kosciusko uplands to marine waters from several locations over the last century. Following USFS development of a road system on the island during and after WWII, Cape Pole, Edna Bay and to a lesser extent Shipley Bay have served as marine access facilities. Edna Bay due to its central location has repeatedly served that purpose. The shallow bathymetry of most of the bay and its semi-exposed orientation to prevailing

winds are constraints on some activities. The USFS retained federal ownership of suitable lands and established a marine access facility (MAF) on the north side of the bay in the late 1990's to move timber off the island by barge. While this MAF was built with the perspective that a facility was needed to move the timber resources proximate to Edna Bay, it has only seen limited use associated with the movement of personal use timber to local small sawmills. The MAF, because of its configuration and proximity to the community has also been used to stage materials, store vehicles, launch small boats and from time to time has served as a landing zone for medical evacuation helicopters. Since its establishment, the MAF has been a source of local controversy because its primary purpose of facilitating the transport of logs via barge is perceived by many in the community as conflicting with other uses of the facility by Edna Bay residents.

While the establishment of the State subdivision, and the subsequent development of the Edna Bay community, facilitated the connection of the various USFS system roads and other local roads built to access residential areas, it also fostered community concerns about commercial forest traffic, specifically log truck traffic, being potentially routed through residential areas of the community. Due to the island's topography, the configuration of the USFS and other road systems, and the significant acreage of young-growth timber that would soon become economic to harvest, it became apparent in the early 2000's that future forest traffic through portions of the community would need to be managed in the interest economics and public safety. To help mitigate the issue, the State in 2017, built the West Edna Bay Log Transfer Facility (LTF). This LTF provides a more direct and protected location for marine transportation of timber harvested from the west side of the island. Separately, the USFS opted to retain its MAF on the north side of the bay to facilitate marine transportation of timber harvested from areas located to the north and east of the Bay.

Overall, the surrounding area experiences incidental use by the public for a variety of reasons related to semi-remote living styles, and activities associated with recreation and subsistence including, but not limited to berry picking, hiking, fishing, hunting and firewood gathering.

E. Background and description of proposal

1. Background:

The demand for State timber throughout Alaska, but especially in SE Alaska, is currently high due to the recent decline in federal timber sale offerings. A diversified economy with a timber industry component has been important to Southeast Alaska for over fifty years. By direction from the Governor and Legislature, the DOF manages its Southeast timber sale program to make commercial timber volume available, and to help sustain the region's timber industry and economy.

The DOF has been proposing and selling timber sales in the vicinity of Edna Bay since the early 2000's. In 2017, the DOF through an agreement with the University of Alaska (UA) Land Management Office, constructed a log transfer facility (LTF) and log sort-yard on the west side of Edna Bay which enabled the UA sell timber from its nearby forest lands. In 2017, the DOF, through a Good Neighbor Authority agreement (GNA) with the USFS, sold an additional 32 MMBF of federal timber which was processed through

the State LTF. In 2022 and 2023 the DOF sold several timber sales out of the Kosciusko Island western tract of the Southeast State Forest. This recent series of timbers sales has enabled Alcan Timber and its operators to harvest timber on the island over the past six years. Sealaska Corporation also harvested timber for several years; those logs were processed and prepared for marine transport at the State LTF. It will likely be another 15 to 20 years before young-growth timber located on the western State land tract is merchantable at a scale sufficient to justify similar mobilization and timber harvest efforts. Mobilization costs to Kosciusko Island for a logging operation are relatively high because of its remote location. It was observed by the DOF, and its timber sale operator (Papac Alaska Inc.) that the timber located on the east side of the island might be most feasible to harvest in the short term due to existing markets for the old-growth timber that may not exist in the near future.

The DOF initially began reconnaissance activities on its eastern tract between 2011 and 2013 but elected to defer timber sale development in that area to focus its efforts on developing timber sales on the west side of the island. Due to reduced priorities at other locations in Southeast, DOF staff were able to reengage on the Kosciusko Island East project in the fall of 2023, while also conducting timber sale administration on other state and federal timber sales located to the west. Kosciusko Island East reconnaissance efforts examined timber types, potential road access, logging systems, geology, soils, hydrology, and fish and wildlife habitat within the proposed sale area. By Summer 2023, the DOF foresters had completed tasks defining the economically operable timber in the area. Locations of proposed road centerlines, drainage structure locations, harvest unit boundaries, anadromous fish retention areas, and associated natural resources were field-located and mapped by the end of October.

2. Timber Volume and Sustained Yield:

The timber is located on State Forest classified land. The volume in the PBIF was identified as 5 MMBF and was based on the 2016 Southern Southeast Area Operational Forest Inventory, interpretation of aerial and satellite imagery, and field reconnaissance. The total estimated sawlog volume for this 186-acre sale area has been updated in this document to be approximately 7 million board feet based on a timber cruise done in October of 2023.

The Division of Forestry and Fire Protection is required to manage its timber harvest on State Forest land on a sustained yield basis. “Sustained Yield” means the “achievement and maintenance in perpetuity of an annual or regular periodic output of the various renewable resources of the State land consistent with multiple use” (AS 38.04.910). The Division’s policy is to define “regular periodic output” as out-put over a ten-year period. This is done to allow for market fluctuations and operational restrictions. Based on the DOF’s inventory of its land and the timber base, it has determined an annual allowable cut of 9,100 MBF per year for the Southern Southeast Area. The DOF will meter the volume offered for sale without exceeding the annual allowable cut. This action alone, and in combination with other timber sales that are sold, will be within the allowable cut and comply with sustained yield requirements. The duration of the timber sale contract(s) will

be governed by the economic conditions at the time of the sale. The DOF in Southeast typically sets the contract duration at three to five years.

3. Harvest Unit Design:

Existing stand conditions within the sale area exhibit predominantly old-growth characteristics. Based on our experience, the forest would likely have significant wind damage if partially harvested. The sale area harvest settings are designed for even-aged management with clear-cut harvest using ground-based logging systems. The clear-cut silvicultural prescription is based on past harvest activities in Southeast Alaska and in other hemlock-spruce forests of the Pacific Northwest. The harvest settings are designed to minimize windthrow and the amount of residual damage to the remaining stands while minimizing common forest pests and diseases such as dwarf mistletoe (*Arceuthobium tsugense*) and black-headed budworm (*Acleris gloverana* (Walsingham)). Logging in combination with the clear-cut prescription allows for significant scarification of the seed bed and allowance of sunlight to reach the forest floor. This creates a post-harvest environment favorable to economically significant species such as Sitka spruce, western red cedar and Alaska-yellow cedar, which are less shade tolerant than western hemlock, an aggressive colonizer of the stand reinitiation phase. While two-aged or uneven-aged management prescriptions exist, the other benefit from even-aged management is that a timber manager recovers more revenue because their costs are distributed over a larger volume of timber for a given area. Given the configuration of the potentially operable sale boundaries relative to remaining timber, the lack of a larger available timber base and the remote nature of the sale, the added cost of a partial harvest relative to retained forest values in this area is not justified.

Reconnaissance by the DOF indicates that the area is harvestable using shovel logging techniques. This ground-based logging system will utilize directional timber falling techniques and benches on the terrain to access the timber. Soils integrity is relatively easy to manage using this method by employing adequate puncheon on skid trails which minimizes impacts to the soil and water quality. Puncheon is a term that refers to using nonmerchantable slash and logs to support the logging shovel on top of the organic soil mat. Use of puncheon not only minimizes compaction of soil it also helps to stabilize the soil, similar to tree root systems, from displacement by the machine or later by other forces such as surface water runoff.

This sale has been designed overall to avoid negative impacts to freshwater tributaries and anadromous fish habitat identified by the DOF during field reconnaissance and documented by ADF&G in its anadromous waters catalog.

4. Unit Access:

Access road design, construction, and maintenance will comply with the Forest Resources and Practices regulations (11 AAC 95.285-.355). Road standards and guidelines of the managing agency will be addressed to the extent prudent for the projected use. During operation of the timber sale all roads associated will receive timely and routine maintenance.

The existing road system on Kosciusko Island was constructed over the past several decades to accommodate the larger landowners' forest management activities of which the USFS is the principal manager. The USFS has constructed most of the infrastructure on the island. The community of Edna Bay has also developed and improved forest roads that are part of the community and the public road right of ways within the community using grants, in kind services, and infrastructure programs offered by the USFS and the State.

Existing Haul Routes Examined:

The DOF considered four separate haul routes to move the timber to market from the Kosciusko East timber sale area. These routes generally would use roads and log transfer facilities already in existence. Support of logging operations with any of the haul routes identified would likely increase traffic levels in the community and surrounding area regardless of the particular haul route used by the log trucks and other logging equipment. This additional road use would typically occur at the beginning and end of each day associated with the workers commuting to and from the sale area.

The examination of potential haul routes is a normal part of feasibility analysis but was also done in response to inquiries from the community of Edna Bay (Spring of 2023) at a city facilitated informational meeting with DOF staff. Some members of the community at the meeting had an interest in the feasibility of avoiding the community with log truck traffic because of traffic safety and the long-term impact on road integrity. Comment at the meeting also described the community use of the area surrounding the public float plane dock, the fuel facility, and the East Edna Bay MAF.

-Haul Route Option #1: Approximately 10.3 miles of road would be used to haul logs from the timber sale area north to an established Log Transfer Facility (LTF) in Shipley Bay developed by Sealaska Corporation to access their recent land grant on the island. The route would use a series of roads: the USFS 1525000 Road to the 150000 Road; this mainline route needs reconstruction on its approximately seven miles of length and reinstalment of the Trout Creek (105-50-10010) stream crossing that would require at least an 80-foot bridge; the refurbishment of several other notable stream crossings requiring short bridges along with 0.6 miles of new road construction to connect the 1534300 and the 1525000 Roads; and the re-establishment of 3.8 miles of road decommissioned by Sealaska Corporation in 2018 to access the Shipley Bay LTF. Several anadromous streams cross the latter section of the route and would also require re-installation of bridges. The re-establishment of the Shipley LTF would also be necessary as it was decommissioned along with the road system. The Shipley Bay facility is geographically isolated from other timber operations in Southeast Alaska and thus would likely have higher log shipping costs. The hauling route is relatively long thus requiring a larger number of trucks to match logging production rates. This combined with the extensive road construction to produces a projected sale timeline that is longer than one season, has a significant lead time for the bridges needed and is operationally complex. The combined capital and operational costs make this route unfeasible for a timber sale of this size.

-Haul Route Option #2: Approximately 1.1 miles of the 1525000 Road (USFS) would be used to haul logs from the timber sale area to the East Edna Bay Marine Access Facility just west of the Public Floatplane Dock. The wood would be decked temporarily at that location and likely moved semi-daily to the West Edna Bay LTF via a mid-sized barge and then processed and bundled at the sort-yard for transfer to a ship at another location. This route covers approximately 0.9 mile of the 152500 Road. A half mile section of that road needs ditch line construction, relief culvert installations, and recrowning of the surface. Road width expansion from its current 14 feet width to allow two-way traffic would be desirable at several locations on the route. Trucking distance is relatively short. Operations could be well supported from the existing facilities in the area with this alternative. The reliance on a barge transfer has been noted as a possible drawback due to high operational costs and the influence weather has on marine operations compared with an upland operations environment. Community use of the area may present some congestion that would require accommodation by the different interests. Users would need to interact with concentrated truck and barge traffic proximate to the community float. The city operates a fuel facility in the area which would necessitate the need to coordinate fuel barge deliveries with the log barge traffic. The primary mitigation strategy would be the proposed widening of the haul road and operational communication with the city and public. This road reconstruction in general is observed by the DOF to be useful to the community regardless of the harvest of timber because of the road's current poor surface condition.

The USFS MAF on the east side of the bay is a relatively small but adequate footprint for the purpose and while it was originally constructed for the movement of logs it has not experienced significant use for that purpose to date. Because of its age, some refurbishment of the drive-down and barge bulkhead may be necessary for log transfer use. An existing short bypass road allows local traffic to avoid the log transfer area fronting tidewater. The MAF has experienced notable other incidental use by the community primarily associated with launching and storing boats. Storage of old vehicles and trailers is occurring along with unknown duration storage of building materials (piling, lumber, etc.). Comment was provided during the 2023 community meeting that the site is occasionally used for helicopter medical evacuation by the US Coast Guard. While log storage at the site would decrease the suitable area of the site for helicopter operations, helicopter landing and hoisting could still be accommodated because a significant amount of area will be required to be kept clear for the unloading of trucks and the loading of the barge. The term of the imposition of the projected logging operation use of the facility anticipated to last less than one operating season.

-Haul Route Option #3: Approximately 9.6 miles of existing roads (1525000, 1520303, 1520200) would be utilized to haul logs from the timber sale area, through the community of Edna Bay to the existing State LTF on the southwest side of Edna Bay. This route is along the existing 1525000 Road until reaching the 1520000 Road within the community of Edna Bay. From here the route would head along another 2.8 miles of public road (a public right of way) until reaching the USFS managed 152000 Road located on private land on the west side of the community then continuing another 1.6 miles south on the road until reaching the junction of the

state 1520070 Road. The road is on a combination of SESF and UA ownership for another 3.7 miles until reaching the active State of Alaska LTF. This route has a relatively long hauling distance. Capital road costs were estimated that included the upgrade of the 1525 Road as described in Route #2 as well as lowering the grade on the west side of Charlie Creek, upgrading drainage structures on several sections of the community road, and resurfacing the 1520 Road from its departure from the school area to the junction with the state 1520070 Road to the West Edna Bay LTF. The road could be additionally improved by adding pullouts to the community road at several locations. The public road through the community appeared geometrically capable of handling the added traffic at the projected log hauling speed of 15 MPH. The use of this route is in large part feasible due to upgrades made by the USFS to the bridge and road surface in 2017. Several sections of the road were improved by the USFS but due to the age of the road it may need additional material added as use is applied; this appears feasible and is to be expected with forest operations. This route ranked slightly more expensive than Route #2 as far as cost although it has double the project timeline because of the additional construction and added trucking. The number of trucks hauling daily may be achievable within the present equipment and labor pool located in the area. The route exposes the project to the largest footprint of public traffic out of all the alternatives and there is an assumed cost that may be encountered with maintaining the older sections of the road. Risks appear to be manageable within existing methods. It has a projected operations length of less than one operating season. The city has voiced reservation regarding even proposing the use of the road because of traffic safety and has passed city code governing specified commercial operations on the road. The DOF developed the option based on the road being a public right of way that has physical characteristics that could enable the proposed activity to feasibly occur.

-Haul Route Option #4: Approximately 21.7 miles of road would be utilized to haul logs from the timber sale area northwest to the existing USFS tie-in road (1520500) and around on the USFS 152000 and 150000 roads, south into the Southeast State Forest Road and into the west side of Edna Bay (the State LTF) via the state road system. More than half of this route requires reconditioning or reconstruction of roads to be used. Use of this route would remove the log hauling traffic from the community. Truck hauling time would be relatively high and combined with the extensive construction needed, would produce a sale timeline that would be long and challenging to manage. The USFS tie-in road (1520500) has several sections that are relatively steep for adverse hauling of logs and would markedly slow trucking and be a burden to keep surfaced properly for traction; the west end of the road is also in need of reconditioning. Many log trucks would be required to keep other costs within a reasonable economic scope. The large quantity of trucks though required by this alternative was considered by the DOF to not be reasonable to expect of the operator; this many assets on the road would also drastically increase complexity of support operations. Costs of this alternative, although not as high as Route #1 do not appear to be feasible and would likely require more than one operating season due to the road construction lead time.

-Haul Route Option #5: Approximately 4.32 miles of road would be utilized to haul logs from the timber sale area northwest to the existing USFS tie-in road (1520500), then south on the 1520 Road to the west end of the 1525 Road and on to the USFS MAF on the east side of Edna Bay. The USFS tie-in road (1520500) as previously mentioned in Option #4 is common with that alternative and has several sections that are relatively steep for uphill hauling of logs that would affect trucking speed and road maintenance. The 1520 would generally need reconditioning and reconstruction in several areas due to observed road foundation conditions and poor drainage structures. This work on the 1520 Road would likely be beneficial overall to the management of the SESF as timber harvest in the northern block is considered possible in the next several years. The intersection at the bottom of the hill is not a perpendicular intersection and would likely benefit from vegetation clearing and traffic management signs. The section from the 1525/ 1520 intersection to the MAF has several sight distance limited curves that may be improved with vegetative clearing and turnout additions to accommodate existing travelers and the log trucks. The portion of the route from the 1525/ 1520 intersection to the MAF contains a community water withdrawal point (spring/ stream) that is used by the residents; trucking is not projected to affect the water source but would likely affect the general ease of access to it during operational hours. A pullout exists at the site that may be possible to widen. Several members of the community suggested that this route would best be deployed with loaded truck traffic operating in a counterclockwise fashion to the MAF and traveling empty up the hill on the 1525 depicted in Option # 2. Regardless of the empty truck travel route, this round-trip route is more than 2.5 times longer than the comparable Option #2, is projected to have haul costs 50% greater than Option #2, has additional construction costs, and still has the need for marine transportation to move the logs to the west side of the bay for scaling and transportation off the island.

Preferred Alternative:

Haul Route #2 with the use of the USFS MAF on the east side of the bay is the preferred alternative chosen by the DOF due to the minimal exposure to unknown risk, it is the shortest route and has the least overall project costs. Practically the entire route once the 1525 Road is intersected is downhill to the MAF. The concerns voiced by the community and observed by DOF are reasonable to manage with the resources, revenue, and time available.

The primary access proposed is the USFS mainline route on the north side of the sale (1525000 Road) which passes through several ownerships and the community of Edna Bay. The 1525000 Road between the sale and the public dock areas has significant surface irregularities precipitated by a combination of its steep grade and years of incidental use with limited provisions to direct runoff drainage on its surface. The width of the right of way and grade of the alignment limits the scope of feasible grade improvement work on the 1525000 Road. Regardless, per the Alaska Forest Resources and Practices Act (FRPA), the DOF will specify contractually in the timber sale that any road utilized by forest operations will be brought into regulatory compliance at a minimum and meet the intent of the managing agency's standard.

Assessment by the DOF indicates the road can be markedly improved and left in a condition post timber sale that is feasible for the community and the USFS to maintain in the future. Proposed work on the 15250000 Road associated with this timber sale is outlined in the FLUP and will include widening in areas, establishment of a readily drainable surface crown on the road, a ditch line and the establishment of appropriate relief culvert(s) and the replacement of the one surface water drainage structure located at the bottom of the hill. Speed on the road by log trucks will be restricted to 10 MPH in the timber sale contract.

Proposed New Road:

The proposed roads within the timber sale units were located by the DOF and total 1.57 Miles in length. The projected new secondary trunk road ties to the 1525000 Road from within the SESF just south of the northern common property line with the USFS and heads southerly into the sale where two spurs truncate to accommodate yarding activities.

The road system, with a few exceptions, is designed to be constructed with grades less than or equal to 12%. Some drilling and shooting will be required to remove rock obstructions and facilitate good drainage or to bench the road for short steep segments on rock outcrops. The site is well drained with very little surface water evident. Two culverts have been proposed along the main route. These drainage structures are in an area where no water was observed but evidence of intermittent stream beds could be found with narrow, shallow channels of exposed rubble and gravel. Relief culverts will also be utilized if surface flow pools against the road.

5. Appraisal method:

DOF will appraise the timber value in compliance with 11 AAC 71.092. The sale area will be appraised using a residual value appraisal method. Selling values and extraction cost data are obtained from industry sources, the United States Forest Service, and previous operations.

F. Resources and management

1. Timber

a. Timber Stand Composition and Structure:

Timber types are primarily a mix of old-growth western hemlock and Sitka spruce with a minor component of old-growth western red cedar particularly in Settings 1-1 and 3-1. Sitka spruce is characterized by dead or broken tops with frost cracks and dieback, though significant volume remains throughout the sale area. Western hemlock of considerable height is located within Settings 2-1, 2-2, and 2-3. Defoliation from black headed budworm and hemlock sawfly (*Neodiprion tsugae* Middleton) was evident but has not resulted in significant levels of tree mortality. Dwarf mistletoe infections are considerable with numerous hemlocks infected throughout the area.

Young-growth spruce-hemlock stands are located along the unit line boundary to the west and south of the sale where sub-merchantable timber remains in rotation. Settings 2-3, 3-1, 4-1, and 4-2 may contain minor amounts of young-growth timber from these stands.

b. Stand Silvics:

The focus of this proposed sale is to harvest old-growth timber. Timber stands included in the sale have relatively high commercial timber volumes per acre. Some locations of the sale area have experienced significant disturbance from numerous wind events creating a variety of canopy heights. The stand is perpetually being disturbed and has a significant amount of woody material on the forest floor from this disturbance type.

Outside of the sale area to the south near Limestone Point a topographically isolated old-growth Sitka spruce, western hemlock, and western red cedar stand remains. The poor quality and low volume of these stands standing is apparently associated with legacy blowdown events which have caused substantial damage to the spruce. The hemlock is shorter with more defect than trees within the proposed sale and most of the merchantable western red cedar is short and dead topped. Two eagle nest trees are adjacent to the stand, and the site is also relatively steep which has led the DOF to exclude the area due to poor timber quality and operability.

Older young-growth-stands of spruce-hemlock are nearing merchantability adjacent to the proposed sale. Regular blowdown events seem to be a common occurrence even within this younger age timber type with small openings in the overstory scattered throughout the stands. Some of the dominant and codominant spruce receiving direct light and good position on the site have reached merchantable size and contain at least one merchantable log. Due to the high ratio of pole timber to sawlogs, the adjacent stands to the west and south are expected to become economically feasible to harvest in the next 10-20 years based on field reconnaissance. The collective adjacent young-growth stand is approximately 100 acres on the SESF with additional regeneration on Settlement classified lands.

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

Natural regeneration is the preferred regeneration method for this sale, and it is anticipated that adequate stocking levels will be achieved within five years after harvest. Experience with this regeneration method on POW has shown that well-stocked stands are readily established within regulatory timelines. Logging will break down the slash piece size and residuals to the ground level, accelerating decomposition and opening more growing space. Disturbance associated with

logging will also increase seed bed opportunity and seedling survival by creating mineral soil access and micro relief.

Sitka spruce and western red cedar are the preferred species for reforestation in the projected future market conditions. Spruce and western red cedar will likely be the favored and dominant species following harvest due to anticipated levels of ground scarification and open stand conditions during the stand reinitiation phase. Scarification through ground-based harvest methods disturb the vegetative mat and in turn provides a more receptive seed bed. Western hemlock will also be a major component of the regenerated stand since it currently occupies the site and provides a prolific seed source.

d. Topography and Soils:

The proposed sale will be designed and managed to prevent significant impairment of the land and water with respect to renewable resources (AS41.17.060(c)(5)).

The sale area is situated on an undulating coastal peninsula, with a southerly aspect and total elevation ranging from sea level to around 350 FT. The sale area primarily has a slope of less than 35 percent though some short steeper pitches exist. Karst limestone geology with rock fins, fissures, and semi-vegetated outcroppings are found throughout. The overall site is moderately well-drained with few indications of year-round surface waters.

Karst characteristics that may be more susceptible to hydraulic change have been field identified at other locations on Kosciusko but have not been identified at this site. Harvest operations will be instructed to maneuver and manipulate timber and slash to minimize change in karst structures, post-harvest soil erosion and to maintain any evident natural drainage patterns. Sediment movement is recognized as a risk to karst structures and will be mitigated where those features manifest.

During times of saturated soil conditions operations will be expected to adhere to Best Management Practices (BMPs). Machines will be properly supported by puncheon or slash while maneuvering in areas with indications of emergence and/or submergence of surface water. If crossings are required machines will be expected to remove the woody material from the stream when finished. Turbidity will not be an issue in this sale given the lack of surface water and infiltration rate of the soil.

2. Wildlife habitat and harvest.

As required by AS 41.17.098, DOF provides due deference to ADF&G to ensure all wildlife habitat issues are addressed by the proposed timber sale design.

The United State Fish and Wildlife Service publishes a geodatabase of identified bald eagle nest locations. The nest trees identified are a compilation product of multiple

aerial and boat surveys conducted in the early 1970s through the 1990s in cooperation with other federal and state biologists. The intent of the list is to communicate and maintain knowledge on the nesting locations relative to other habitat values that the species find useful; previous work indicated that these trees are used through multiple generations and can be important for the viability of the species in an area. Part of the reason the list was generated was because of previous concerns for the species nationally; it was formerly listed as an endangered species. The species never was endangered in Alaska, nevertheless resource development activity in Alaska precipitated the effort to document and preserve the nest locations. The species is no longer on the national endangered species list. While the larger trees identified in the survey have significance, they are often subject to environmental damage or do not represent the only nesting option. Due to the age of the information, the location of these tree is often misplaced geographically in the database if it is not coincident with a clear geographic feature because of the coarse mapping used in the survey, the method of the survey and the skill set of the biologist at the time of the survey. Per 11 AAC 95.340 (c), the DOF avoids the nest locations in the planning of state timber sales. The DOF in 2023 applied sub-meter grade GPS in coordination with Arc Field Maps and USFWS point vector data to attempt field location of the bald eagle (*Haliaeetus leucocephalus*) nest trees. No eagle nest trees or sign (feathers, bones, tree tags, etc.) were located during field visits. Bald eagles were heard overhead but not located while perched or feeding. While specific nests were not identified with recent efforts, large trees matching the descriptions are present in the area and were reserved for habitat purposes. A 330-foot retention area was applied to each historical eagle nest tree location within the sale area which influenced the placement of the harvest boundary along the eastern side of the sale.

The DOF conducted a timber cruise to gauge timber merchantability using a grid sampling system that covered the entire sale area and conducted extensive sale reconnaissance efforts. Black bear (*Ursus americanus*) scat and claw marks up the boles of several trees was observed in the sale area; no potential bear den sites were observed. Wolf (*Canis lupus*) scat was also observed along the 1525000 Road, on the north side of the sale area; no potential den sites were observed.

Sitka black-tailed deer (*Odocoileus hemionus sitkensis*) scat was found in numerous locations throughout the sale area, no live animals were observed. The proposed harvest area will likely diminish deer habitat in the long term. While the surrounding area of Edna Bay has had significant timber harvested historically, this specific project area offers undisturbed nondevelopable area on either side of it that has a habitat function that will continue. The harvest disturbance is anticipated to increase food values for deer within its footprint for the next 20 years; precommercial tree thinning could extend the period of forage availability another 20 years.

3. Fish Habitat, Water Resources, and Water Quality.

The proposed sale has been designed and managed to protect fish habitat and water quality in compliance with the Forest Resources and Practices Act and regulations (AS 41.17 and 11 AAC 95). As required by AS 41.17.098, DOF provides due deference to ADF&G to ensure all fish habitat issues are addressed by the proposed timber

sale design. DOF provides due deference to the Alaska Department of Environmental Conservation (ADEC) for all water quality issues.

There is one cataloged anadromous stream known locally as Hamlin or Buggy Creek (103-90-10610) located on the northeast boundary of the timber sale. A timber retention area of 100 FT or more was flagged on the south side of the creek using pink timber boundary ribbon and stream retention course ribbon (blue/white stripped) tied together. Riparian habitat function related to this waterbody will be maintained with this timber retention area.

One tributary to Hamlin/Buggy Creek was field identified. Two other very small surface water streams were identified to the south. All these waters appear to have intermittent surface flow and did not have indications of fish or fish habitat. These waters can be avoided with direct harvesting activity, but best management practices are required of operations to maintain water quality.

Several intermittent surface water quality streams were identified. To protect the water quality of all non-fish bearing waters the DOF will require a combination of directional felling, partial suspension of logs, and removal of logging debris and slash from all stream courses during harvest operations.

4. Recreation, Tourism, and Scenic Resources.

The timber sale area is not known to provide significant recreation resources. This timber sale is not expected to adversely affect recreational opportunities on Kosciusko Island due to its location and size.

Incidental tourism is expected to remain at its current state as there are minimal opportunities for lodging, groceries, and general services within the community of Edna Bay. Commercial tourism is not known to occur in the area. Given the removed location of the proposed sale units relative to the rest of Davidson Inlet, impact or disruption to the general public's use are not expected.

Scenic resources are expected to be altered temporarily when viewing the sale from Davidson Inlet, from aircraft transiting or along the 1525000 Road. This style of view shed will be like other locations in southeast where periodic timber harvest has occurred. Proposed sale roads will allow the public to view the ocean and open landscape from some locations within the sale.

5. Cultural Resources.

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. The DOF visited the site area with SHPO in 2013 to assess historic site potential relative to topography and a known historical site to the east. This survey did not indicate resources that needed further study or protection within the sale area.

If additional archaeological or historical 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 resources.

6. Subsurface Resources

There is no known current mining activity in the immediate area. Other than sharing some of the same access roads, this sale should have no impact on the potential mining resources or mining activity in this area. Karst features found within the sale area will be taken into consideration and avoided where feasible.

G. Costs and benefits

Making the timber available on State land is in keeping with the Alaska Constitution and the intent of the governor and legislature to make the resource available in a sustainable manner commensurate with demand. The SESF was created with this vision in mind.

Based on DOF observations of the project area and historic markets, timber revenue is projected to cover administration, access and operating costs for this sale area and return stumpage royalty to the State. Kosciusko is an established location for timber harvesting with known risks and costs of operation. The existing POW labor force can access the area by boat from Naukati and by plane from several other localities. The log transfer sites, logging camp and other community resources are established resources. The operator and timber purchaser currently situated on Kosciusko Island have voiced an interest in the use of these timber resources and in continuing their operations proximate to the community.

The community of Edna Bay is likely to also realize tangible benefits for some of its residents. Current access to the subdivision on the east side of the bay is somewhat hindered due to the condition of the old road system from the state float to the top of the hill. Timber sale access to the sale area will reestablish this roadbed such that it may be possible to maintain within the observed resources of the City of Edna Bay. Lot owners in general on this side of the bay are constrained with the current access due to the surface condition of the road. The projected road surface will be a significantly better surface to drive on for most people. Improvement of the road is projected to also benefit the broader community with improved subsistence access to the USFS and State managed land to the east. The road restoration and timber sale activity are viewed by some in the community as character changing as there has not been significant logging close to the community since its inception. While this may be true in the short term, similar conditions of low activity are projected to return afterwards.

While the DOF encourages utilization of the timber resource by the timber purchaser, significant residual firewood potential typically is present after a timber sale is logged. This proposed timber sale is substantially closer to the community than the sales sold in the past ten years to the west. The DOF will consider leaving the road system open to some

degree if demand is indicated by the community and a method is achievable within the community to actively manage the road condition in the DOF's absence.

Telephonic and data communications have generally been less than desired in Edna Bay with the legacy microwave system and with alternatives related to expensive satellite systems. The DOF experienced reliable cell phone coverage in the fall of 2023 from the proposed timber sale road system while conducting field work on the eastern side of the peninsula.

Timber sales have traditionally created broad economic benefits to the communities of Southeast Alaska. The business communities on POW and other nearby SE communities will receive direct economic benefits by providing support services for the operators such as fuel, food, housing, medical and miscellaneous supplies.

VI. PUBLIC NOTICE

This PBIF was publicly noticed in compliance with AS 38.05.945. Notice was posted on the Alaska Online Public Notice System on December 27, 2023. Notices were also posted at the Ketchikan, Craig, Wrangell, Petersburg, and Edna Bay Public Libraries. Mailed notices were distributed to a mailing list maintained by the Southeast Area Office and public notices were sent to the post offices of Ketchikan, Ward Cove, Craig, Klawock, Thorne Bay, Edna Bay, Coffman Cove, Naukati, Metlakatla, Wrangell and Petersburg. A legal notice is also provided in the Ketchikan Daily News; the Island Post; and the Petersburg and Wrangell papers. The DOF briefed the City of Edna Bay Council at a regularly scheduled city council meeting during public comment regarding the proposed state timber sale and responded verbally to questions from the audience.

VII. PUBLIC COMMENT

DOF received in a timely manner 29 comments on the preliminary best interest finding noticed on December 27, 2023. The bulk of the comments came from individuals with several collectively submitting. The City of Edna Bay several businesses, one organization (SEACC) and one agency (ADF&G Habitat Section) all contributed.

Within a week of the close of comment, the Alaska Forest Association and several log trucking companies supplied comment.


The DNR-DMLW- Reality Services Section contributed to analysis of ownership and jurisdictional issues.

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. Significant amount of comments were received describing the existing use of the area, the appropriateness and safety of hauling logs through the community of Edna Bay.

VIII. DISCUSSION, FINAL FINDING AND DECISION

After due consideration of all pertinent information, the ADNR has reached the following Decision: 186 acres of old growth forest composed of western hemlock, Sitka spruce, western red cedar, and Alaska yellow cedar on Southeast State Forest land. Harvest activities on the Southeast State Forest lands will follow the management intent of the Southeast State Forest Plan. The DOF finds that this decision satisfies the objectives stated in this document and it is in the best interest of the State to proceed with this action under its authority 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



John Boyle
Commissioner
Alaska Department of Natural Resources

2/29/2024
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 Greg Staunton, Southeast Area Forester, greg.staunton@alaska.gov, 907.225.3070.

XI. APPENDICES

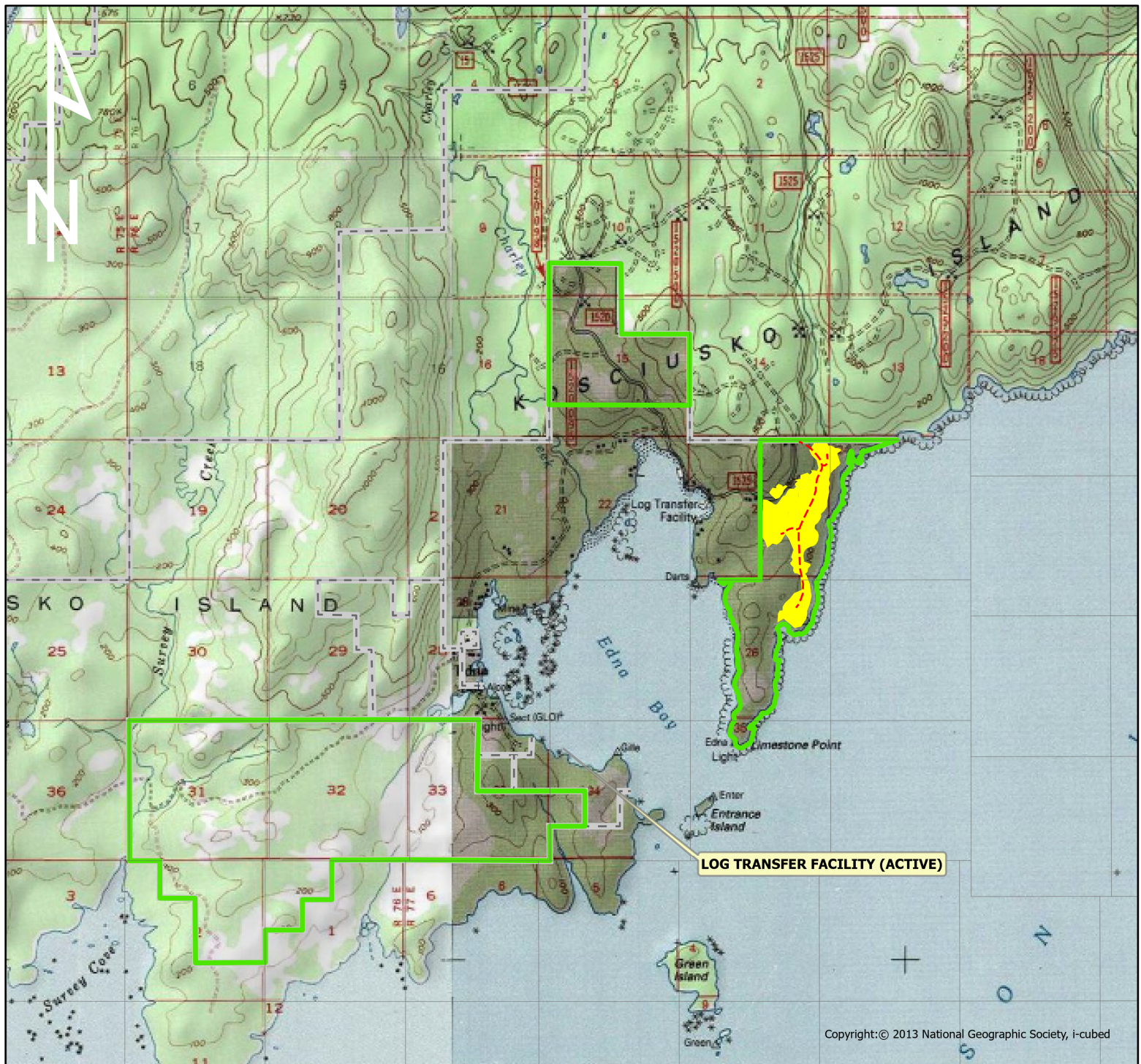
Appendix A	SSE-1384-K Kosciusko East Timber Sale Maps
Appendix B	References
Appendix C	Appeal Regulations
Appendix D	Kosciusko East Timber Sale Comments & Responses
Appendix E	SSE-1384-K Kosciusko East Forest Land Use Plan

Appendix A SSE-1384-K Kosciusko East Timber Sale Maps

Vicinity Map (one page)

Haul Comparison Maps (three pages)

Unit Maps (three pages/ see FLUP Appendix A)



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0 1 2 Miles
Area Map 1 in = 1 MILE

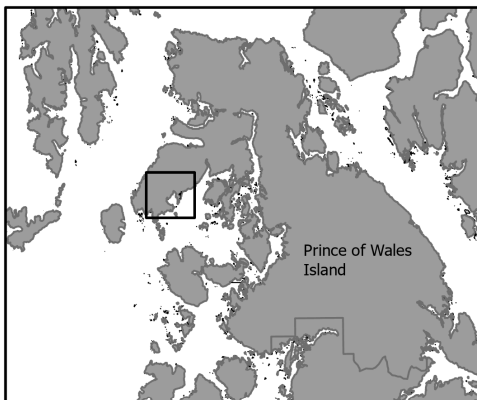
T68S R76E, Section(s) 23, 24, 26
Copper River Meridian

APPENDIX A1 **SSE-1384-K** **KOSCIUSKO EAST** **TIMBER SALE** **AREA MAP**

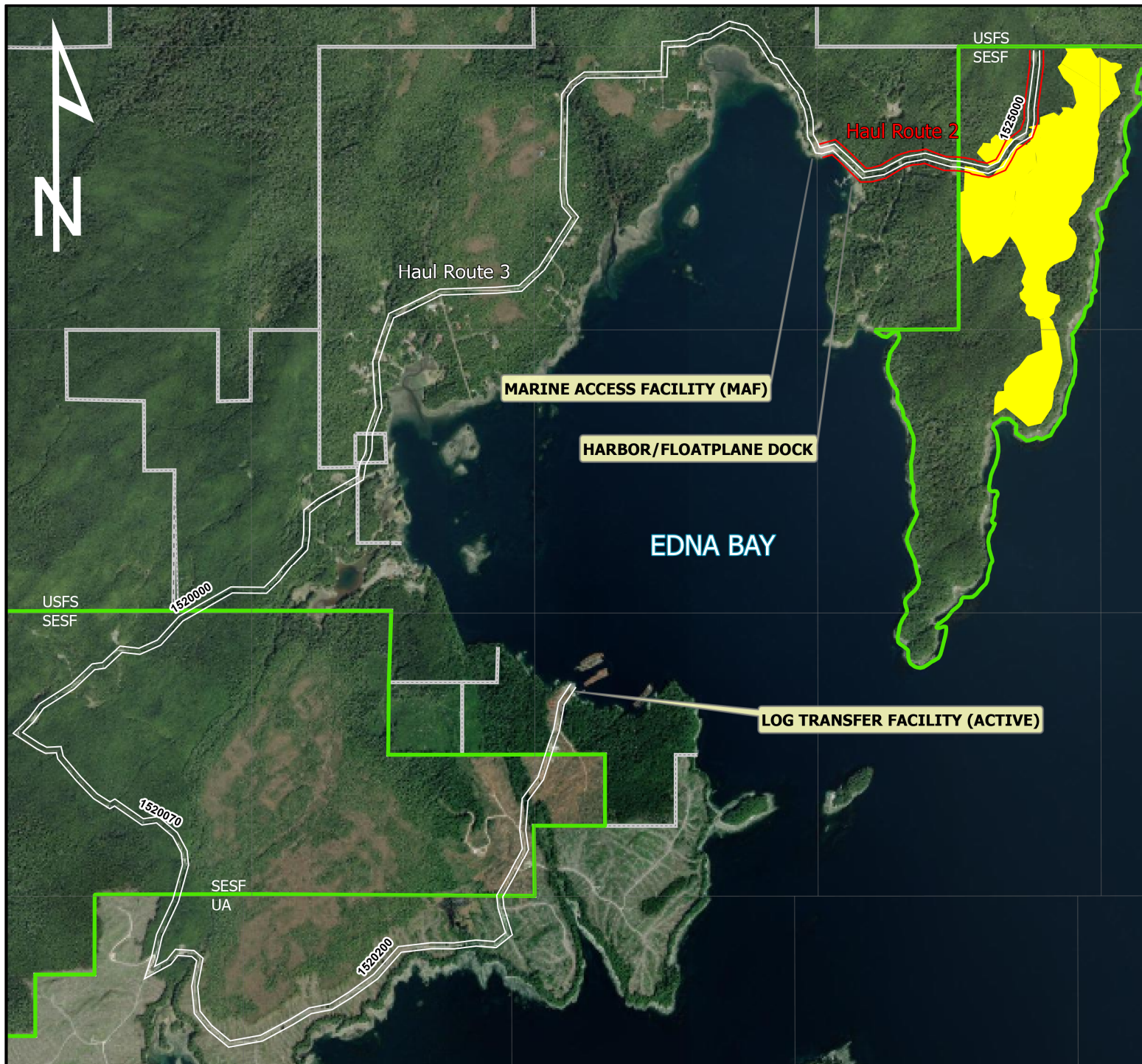


Legend

- Proposed Harvest Unit
- Southeast State Forest (SESF)
- Property Line
- Proposed Road



Vicinity Map 1 in = 32 miles

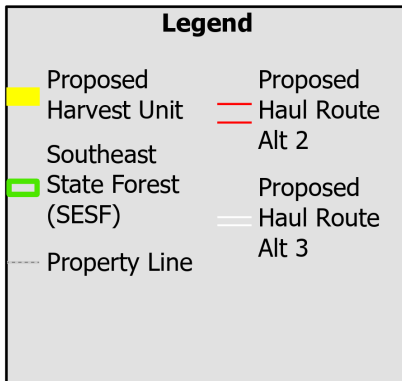


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Area Map 1 in = 1/2 MILE

T68S R76E, Section(s) 23, 24, 26
Copper River Meridian



Vicinity Map 1 in = 32 miles



APPENDIX A3 HAUL ROUTE MAP 1A SSE-1384-K KOSCIUSKO EAST TIMBER SALE

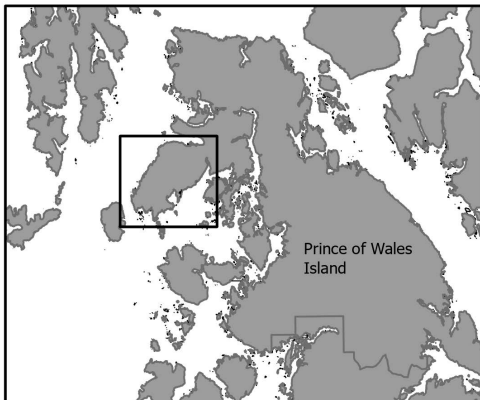




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Area Map 1 in = 1/2 MILE

T68S R76E, Section(s) 23, 24, 26
Copper River Meridian



Vicinity Map

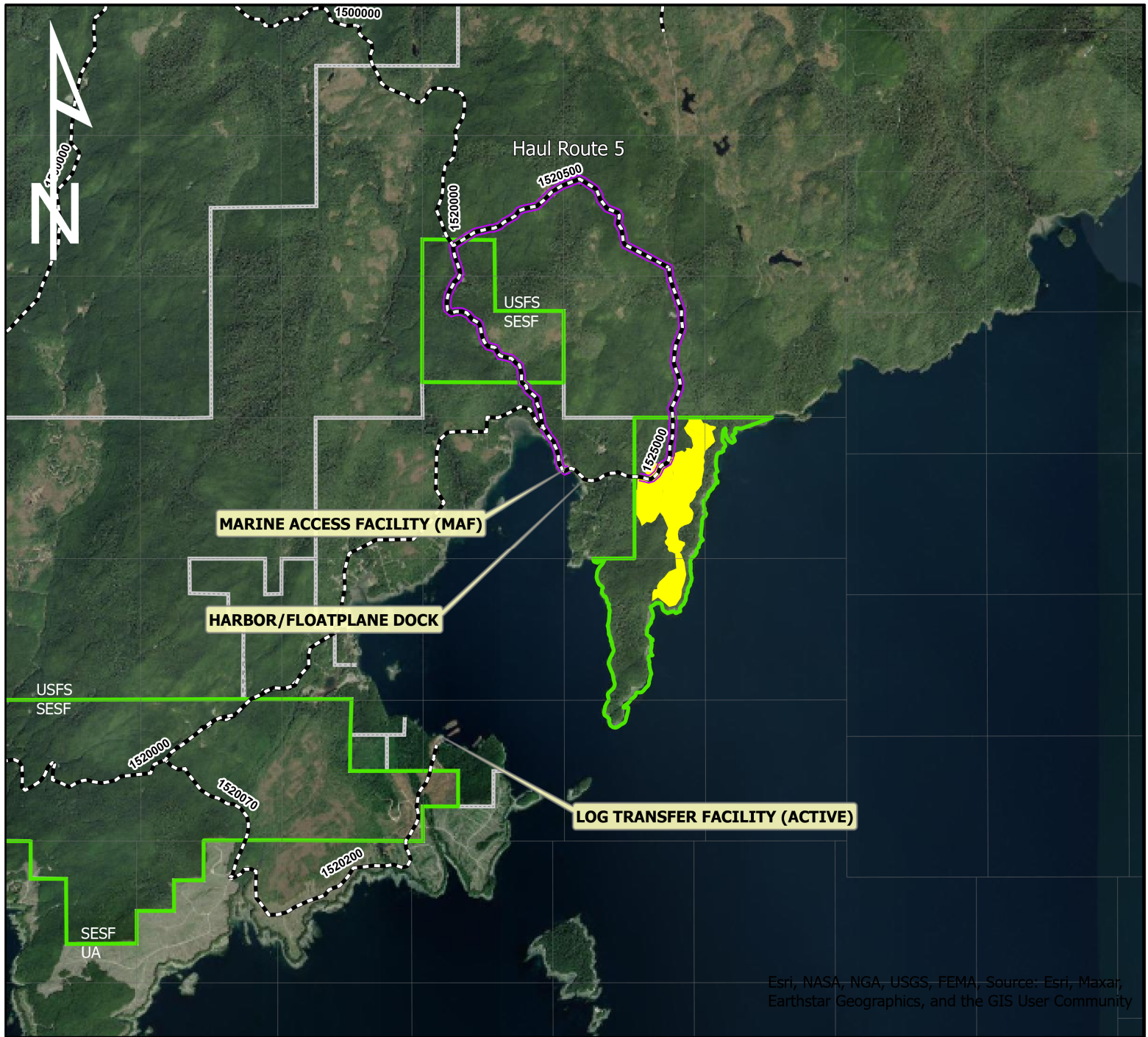
1 in = 32 miles

Legend

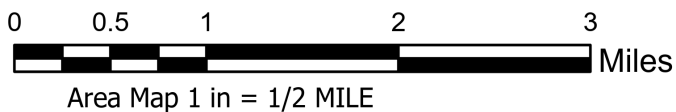
- Proposed Harvest Unit
- Southeast State Forest (SESF)
- Property Line
- Proposed Haul Route #1
- Proposed Haul Route #4

APPENDIX A3 HAUL ROUTE MAP 1B SSE-1384-K KOSCIUSKO EAST TIMBER SALE





Esri, NASA, NGA, USGS, FEMA, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

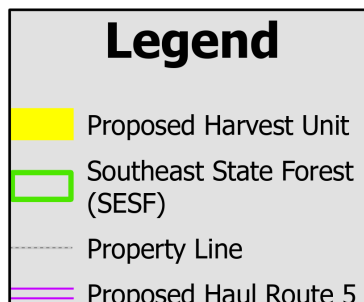


T68S R76E, Section(s) 23, 24, 26
Copper River Meridian

APPENDIX A3 **HAUL ROUTE MAP 1C** **SSE-1384-K** **KOSCIUSKO EAST** **TIMBER SALE**



Vicinity Map 1 in = 32 miles



Appendix B References

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

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Wikipedia. Edna Bay, Alaska. Accessed at: https://en.wikipedia.org/wiki/Edna_Bay,_Alaska

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 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 the 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 SSE-1384-K Kosciusko East Timber Sale Comments & Responses

Appendix D

SSE-1384-K, Kosciusko Island East Timber Sale Comments & Responses

Department of Natural Resources, Division of Forestry and Fire Protection
January 2024

The following people commented on the Proposed Kosciusko Island East Timber Sale SSE-1384-K during or proximate to the comment period that ended on January 25, 2024, for the combined Preliminary Best Interest Finding and Forest Land Use Plan:

Audrey Miller	John Helliwell*	Rebecca Himschoot
Becky Crew	Fran Rhodes	Roger DiPaolo
Brad Thompson	Jim Welch	Scott Brandt-Erichsen
Brian Brown	City of Edna Bay	Susan & Gerald Crew
Brian Poelstra	Kate Lankford	Susan Farrow
Cael Brown	Katie Rooks	Tasheena Huestis*
Caleb Kitson	Louise DiPaolo	Tenisha McNish
Clarence Clark*	Mark Minnillo	Tucker Thompson
Debra & Don Thompson	Mike Williams	Tyler Poelstra
	Myla Poelstra	Tyler Hartley*

* Indicates the comment was postmarked or received after the deadline for comment.

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The following comments were received during the public comment period on the Draft Forest Land Use Plan for the Edna Bay Timber Sale. Copies of the submitted comments are available upon request:

Commenter	Comment	Response
	General Timber Sale Input	
Clarence Clark, Alaska Forest Association	AFA supports the proposed Kosciusko East Timber Sale, SSE-1384-K.	Comment noted, no change required.
Clarence Clark, Alaska Forest Association	The use of operational cost and sells (<i>sic</i>) values obtained from the US Forest Service is questionable. For the last decade plus the Forest Service has not obtained cost collection data from timber sales on the Tongass. Instead, they have adjusted historical cost collection data by an inflation rate. Sales values are obtained from indices that may or may not actual reflect the value of wood grown in southeast. Such information does not reflect the higher cost of operations in SE Alaska. As an example, the cost of barging has more than doubled in the last several years.	Cost Collection. The USFS information is based on its institutional perspective and methodology, and as you point out it may or may not be representative. The DOF uses a combination of sources to model costs and to consider the log market. The current costs of barging and any other information you are willing to provide are helpful for realistic timber development planning. The AFA's candid perspective on methods and means is appreciated.
Brian Brown, Alcan Timber Inc.	Timing is important in regards to this sale, ALCAN request that the DOF offer the sale as soon as possible while adhering to all statutory and regulatory requirements.	Comment noted, no change required.
Clarence Clark, Alaska Forest Association	Timing is important in regards to this sale, AFA request that the DOF offer the sale as soon as possible while adhering to all statutory and regulatory requirements.	
Cael Brown	Please don't sell any more of our precious old-growth trees. Please. Intact old-growth forests are becoming increasingly rare as time goes on, and it seems you guys over at the forestry division consistently, almost like a cartoon character see these parcels of land with money signs in your eyes. Justifying the destruction of our precious, vital undisturbed natural habitats and lands with "jobs" or "profit" is getting bothersome. The jobs of who? The few loggers left on POW who stuck with this economically	Comment noted, no change required.

Commenter	Comment	Response
	<p>unsustainable subsidized industry? This harms southeast Alaskan jobs, by harming our wild lands which support our way of life, our commercial fishermen, or tourism, or hunts.</p> <p>This is, yet again, representative of greed and profit over the Earth, Its people, and its creatures. The public overwhelmingly does NOT support old-growth logging, yet you continue to conduct sales and issue permits as if you don't listen to the public! It's extremely tone-deaf and is indicative of profits for a few over the prosperity of all. Please, do the right thing. Do not sell our Old Growth Timber anymore.</p>	
Brian Brown, Alcan Timber Inc.	When developing a timber sale involving old growth forest within a parcel of a State Forest emphasis should be given to maximizing the acreage harvested. Doing such maximizes future timber management opportunities within the State Forest. Isolating stands of old growth timber ultimately diminishes “production, utilization and replenishment of timber resources” over the long-term.	Comment noted, no change required.
City of Edna Bay	During those comment periods, the City outlined its serious concerns regarding the safety and welfare of residents and the potential impacts from timber harvest and transport within such close proximity to the subdivision and vital city infrastructure.	Comment noted, no change required
City of Edna Bay	The Preliminary Best Interest Finding and Draft Forest Land Use Plan for the Kosciusko East Timber Sale SSE-1384-K is filled with language that diminishes our population and remote location, ignores the number of children that are living here now, the serious	Information on Edna Bay referenced in the BIF was procured from US Census figures listed on Wikipedia. The DOF has subsequently verified the data on the US Census Bureau Website. When proposing a project, the setting typically has relevance in how a project is proposed. The

Commenter	Comment	Response
	risks to public safety and the vital infrastructure this community has spent decades building and obtaining.	population portrayed does not diminish the value of the population.
Myla Poelstra	I am writing today out of extreme concern for the wellbeing of my community and lack of meaningful, adequate response from you regarding the most recent communication we had with you at a city council meeting on January 8, 2024. The reason for your attendance was an agenda item discussing the comment period open at this time for the Preliminary Best Interest Finding and Draft Forest Land Use Plan for Kosciusko East Timber Sale SSE-1384-K. At that meeting, many substantive questions were asked and areas of concern raised. It was my understanding that you would be reaching out to various businesses and agencies for answers to our questions and would be getting back to us, I assumed before the close of this comment period. To date, we have had no follow up from you. Those questions are still relevant to this comment period.	<p>The PBIF has captured the community issues brought forward in several meetings. At the January 8, 2024, meeting, the DOF committed to additionally model the following concerns focused on by the council:</p> <ol style="list-style-type: none"> 1. Whether it was feasible for a helicopter evacuation landing location to be kept clear at the MAF during timber transfer operations. The DOF agreed to compare the size of the suggested helicopter landing zone to the projected area that would be kept clear of logs at the MAF for log loading movement. 2. The barge footprint when it is loading timber and maneuvering relative to the harbor area and public float plane dock. Part of this item would be the review of the configuration with the mail carrier (Taquan Air). 3. Reconditioning plans for the 1525 Road. <p>The DOF regrets we were not able to complete the models as outlined in the January 8th meeting prior to the end of the public comment period. These tasks have been done at this point, and they are represented at the end of this comment matrix (BIF Appendix D).</p>
Myla Poelstra	At our meeting you said it was your intent to fill gaps by combining two steps in the normal process. In my opinion, that intent also should have included the responsibility for quickly getting back to us with answers and assurances that our concerns would be adequately addressed. Many of the issues that you heard about were already brought forward to you during the last two comment periods. I expected you would be ready this time to explain how DOF intended to mitigate the risks and impacts this particular timber sale was going to have on our day-to-day functions.	

Commenter	Comment	Response
	<p>It is unfortunate that you have apparently decided to dismiss the wellbeing of our community in favor of expediting the timber harvest to make opportunity available to the currently mobilized local contractor. If the margins on harvesting timber are so tight that DOF has no other viable options, then you shouldn't be offering a sale at all.</p> <p>How can it be okay for one entity of the state be jeopardizing another in pursuit of stumpage revenue? It has taken 40 years for Edna Bay to obtain the infrastructure it has today. We are finally at a point where we are sustainable and anticipating growth. We have more children spread out across this community today than have been here in the past two decades. Timber operations and children are not compatible. Because of all of these very valid unaddressed concerns we have repeatedly brought forward to you in the last year, I am formally requesting that DOF abandon the idea of moving timber through any part of the community of Edna Bay, the risks and potential consequences of this proposal are simply too great.</p>	
Tasheena Huestis	<p>Furthermore, this project is bringing jobs and interest to a place that could really use it. Passing on this opportunity would stifle the potential of Edna Bay for decades.</p>	Comment noted, no change required.
Tasheena Huestis	<p>Besides a deal is a deal. We do not agree with backing out of an agreement after you get the benefit. Roads and bridges were paid for by Alaskan taxpayers. Unless the city of Edna Bay has the money to pay the state back, with interest, they should hold up their end.</p>	Comment noted, no change required.

Commenter	Comment	Response
Kate Lankford, Papac Alaska Logging Inc.	<p><i>The commenter details in two pages of text outlining the experience of Papac Alaska Logging Inc. and their confidence in safely handling the tasks outlined in the PBIF and FLUP.</i></p> <p>“In closing, I thank the reader for taking the time to consider the facts, that the individuals and companies and agencies involved in Kosciusko East Timber Sale SSE-1384-K, are your neighbors and friends. That without this job or the delay of this job, will collectively extinguish our employment and there's simply no better group of people experience-wise or community focused to accomplish the task. I ask you to consider the benefits of proceeding: support local economy, further improvements to local road systems and dangerous hills reconstructed, thus safer roads to access subsistence activities. I further volunteer to assist and facilitate better communications between the organizations, businesses and individuals. Lastly, I personally implore all participants to find common ground and proceed with this sale as thoroughly and expeditiously as possible.”</p>	Comment noted, no change required.
Mike Papac, Papac Alaska Logging Inc.	<p>The urgency of Kosciusko East Timber Sale (SSE-1384 K) initiation is of utmost importance to this company. We will have completed the Edna Bay Parlay Two by the end of the month, and we have no other source of work at this time. Our employees and their families depend on our ability to provide sustainability, as does the welfare of the subcontractors and business associates that are directly impacted by our layoff. It is not feasible or practical during winter months to</p>	Comment noted, no changed required.

Commenter	Comment	Response
	shut down for longer than a week or two at most, as we would lose most of our workforce and thus, potential cessation of this company completely. Kosciusko East Timber Sale (SSE-1384 K) is literally the only option for continuation.	
Brad Thompson	Thank you for all the time and energy spent putting up this sale. The timber industry brought me to SE in the early 90's. I have worked for Ketchikan Pulp, Phoenix Logging and now Papac Alaska. Most all of the road travel I have done in SE was made possible by the timber industry. Road travel to work, to get supplies, to make firewood, to hunt, to fish and on and on. I would not be living in Edna Bay if not for the timber industry. I am in favor of this timber sale.	Comment noted, no changed required.
Audrey Miller	With regards to the upcoming Edna Bay AK timber sale it's my opinion that this would be able to offer many opportunities to the community and to give employment to those who have worked in this industry before and depend on the continued employment to provide for themselves and their families. I believe this would have a positive impact for many to improve their lives and to improve their community as well as possibly providing maintenance to the roads involved in the project.	Comment noted, no changed required.
Susan Farrow	As a resident of SE Alaska. I would like to provide a positive perspective on the timber sale. This provides work for many families of Southeast Alaska. At a time where employment is limited , shutting this timber sale down does more harm than good. Everything can be done in a controlled manner	Comment noted, no changed required.

Commenter	Comment	Response
	that all communities can benefit from. Timber has been an important industry for many years in this area. Please look at the positive aspects and what this industry has to offer to all including the residents of Edna Bay. There are certain people that will always come up with negativity, but please look at the bigger picture and allow this sale to go through and provide income for many families.	
Debra & Don Thompson	Our comments regarding the above Timber Sale are that we approve of this sale for the following reasons. First most of the Timber is overripe and should have been harvested before now. It will benefit the Community as far as more folks stopping at the local store bringing more business. In addition it brings jobs locally and there are many families that depend on logging to support their families. The jobs locally are few and far between. Also the community of Edna Bay would not exist if not for logging and neither would the community of Naukati Bay. We think this Timber Sale would benefit local Communities and should be approved.	Comment noted, no changed required.
Tenisha McNish	The upcoming timber sale in Edna Bay is a great thing for the community. jobs in Edna Bay are few and far between. Hopefully the loggers will do some much needed road maintenance also.	Comment noted, no changed required.
Becky Crew	I, Becky Crew, Alaska voter and full time resident of Edna Bay Alaska would like to state that we are in full support of the Kosciusko Island East Timber sale proceeding as proposed.	Comment noted, no changed required.

Commenter	Comment	Response
Tucker Thompson	The timber sale in Edna Bay is a good thing for the community. The more jobs in Edna Bay the better off we are.	Comment noted, no changed required.
Fran Rhodes	My name is Fran Rhodes. I live in Edna Bay AK. I was asked to email you to let you know that I am for the timber sale on Limestone in East Edna Bay. I have lived here for 10 years.	Comment noted, no changed required.
Jim Welch	I would like to write in my support for the pending timber sale. It brings jobs and opportunities to the area. The roads are in abysmal condition, and it is evident that the city of Edna Bay is ill equipped to maintain them on their own. It would do the residents a lasting favor long after the logging is over.	Comment noted, no changed required.
Gerald and Susan Crew	We, Gerald A and Susan E Crew, Alaska voters and full time residents of Edna Bay Alaska would like to state that we are in full support of the Kosciusko Island East Timber sale proceeding as proposed.	Comment noted, no changed required.
Brian Poelstra	It seems to me that the DOF isn't interested in pursuing options that would take more than one season to complete, given the location and size of this sale. Therefore, I would offer that the DOF consider setting this sale area aside for future local economic development through small timber sales to local mills and forest operators. Because of the sales' overall size, its proximity to the City of Edna Bay, and because it is old growth that ideally in my opinion should be used to build homes and businesses locally in SE.	Road construction is a major cost component of logging in Southeast Alaska and requires dedicated equipment. A significant amount of road construction is necessary to access more than the north side of the unit. Repeated sales in the area would be burdened by mobilization costs of the road and logging equipment that would otherwise contribute to covering operating costs and ultimately influence revenue generated. Building the road in one entry with subsequent multiple sales would require the state to front a significant amount of cost for an indefinite period. A small sale operator likewise would confront the need to haul through the community but with less financial resources to mitigate local road and traffic concerns. A small sale approach on this tract is not well suited to the remote setting and does not meet the objectives of the sale to support the present needs of the timber industry.
Tyler Poelstra	Suggestion 2: If necessary road repairs and properly addressing the safety concerns is not viable for this sale due to cost, timeliness or other factors that should not be of concern to	

Commenter	Comment	Response
	<p>the City, I would be very favorable to this section of forest instead being reserved for small commercial sales to the benefit of local mills. This timber, regardless of the volatile viability of the foreign export market, will always be viable and valuable locally and essential to construct local homes, docks, and infrastructure. Since the USFS has purportedly stripped available personal use areas under the GNA, it would be a boon for the Division of Forestry to do something that truly promotes the long term wellness of the community and the City by keeping this timber local, to the benefit of the local economy. A truly “Good Neighbor” path forward.</p>	
Caleb J. Kitson	<p>Kosciusko East Timber Sale (SSE-2384-K) represents a plethora of real risks, dangers, and disruptions to the residents of Edna Bay. It is my opinion based on my observations and contact of interested parties that Mr. Staunton has made scant inquiry into this matter. He has not personally contacted the majority of residents in Edna Bay, he has not contacted other interested parties who use the proposed MAF area, he has discounted the risk to the Fuel Facility and the Bay and Inlet at large, he has ignored recommendations from residents on alternative routes that would allow the harvest of timber in this sale area without negatively affecting the community of Edna Bay, and he has callously dismissed the concern that operating at the proposed MAF could prevent an emergency medevac and cost a resident of Edna Bay their life.</p>	<p>The DOF has been operating in Edna Bay since 2003. We have had numerous conversations with residents during that time period. The DOF has advocated and been part of several projects to solve local transportation and timber access issues in Edna Bay.</p> <p>The DOF was present at the January 2023 City Council meeting to review the Five-Year Schedule of Timber Sales, the proposed Edna Bay Parlay Two timber sale, the conceptual Kosciusko East timber sale and take feedback on the Kosciusko GNA timber sale. We have visited several times with Mayor Poelstra on these topics and most recently participated in the January 8, 2024, city council meeting. The outgrowth of the 2023 visits contributed to the haul alternatives portrayed and the proposed sale configuration.</p> <p>The DOF committed to discussing helicopter requirements in the January 2024 city meeting with the USCG, any inflection regarded as callous was unintended. Incidental comment in that setting regarding rotor aircraft reflected our extensive familiarity with helicopter operations associated with wildland fire operations and timber work. Consequently, the DOF contacted the USCG on February 1,</p>

Commenter	Comment	Response
		<p>2024, the interview indicated that their helicopter requires a landing footprint of approximately 100 feet by 100 feet. The willingness to land on their part is a function of terrain, weather, site control and helicopter configuration. The commander interviewed stressed that landing was not required or necessarily preferred for them to perform their mission.</p>
Tyler Poelstra	<p>I question the procedure and legality of combining the public comment period of the Best Interest Finding (step 3) and Forest Land Use Plan (step 4) into one bloated proposal, effectively eliminating one of the two required 30 day comment periods. This provides inadequate time and process for the public to outline concerns and for the DOF to mitigate these factors with due notice periods. It doesn't show good faith that this proposal was released in the middle of the Christmas and New Years holiday week, either. I had no issues with the contractor Evergreen Timber, and I don't with Papac Timber whatsoever. However, due process should not be bypassed by the Division of Forestry in the interest of meeting the mobilized contractor's operational window. If this harvest cannot be done right it should be abandoned, period.</p>	<p>The Commissioner shall complete a Best Interest Finding prior to sale of a state resources (timber) of the size described in this timber sale (AS 38.05.035). The scope of the review is set by the Commissioner and considers only reasonably foreseeable significant effects of the uses authorized by the disposal.</p> <p>The Commissioner is also required to adopt a Forest Land Use Plan prior to harvesting timber (AS 38.05.112). The FLUP represents site specific conditions and imposed constraints of the resources identified in the Best Interest Finding. It is not required outline all the methods and means used by the timber purchaser to harvest the timber.</p> <p>The DOF combined the PBIF and the draft FLUP in one document to better illustrate the structure of the sale because of the location relative to the community and the anticipated desire for information. Some time savings may or may not be realized with this approach based on the comments received.</p> <p>After the decision has been made in the BIF and further detailed in the adopted FLUP, the state timber sale contract execution process requires an operating plan to be submitted by the purchaser that represents current conditions and projected operations. Confirmation and State approval of method and means of harvest (road building, logging, hauling, etc.) is done in the purchaser's operating plan. This plan is updated as needed and is required to represent the operations.</p>

Commenter	Comment	Response
Rodger DiPaolo	I am uncomfortable with the terms used in this plan that describe wind shear issues southeast on that peninsula. This document describes that wooded area as follows: legendary (<i>sic</i>) blow downs; damaged spruce; stunted hemlock; dead topped trees, regular blow down events, common occurrence. I am suspicious that the buffer at Jonathon's boundary will not suffice stopping such winds. And, at some future time, the same for the remainder of the peninsula will effect the other neighboring residential lots. The State chose to sell the subdivision in the 1990's and they knew that the closest lots and blocks were right next to this difficult forest areas.	<p>The dominant natural disturbance mechanism of the temperate rainforest of Southeast Alaska is wind. Wind damage is also typical to some extent where the stand is opened due to turbulence created by the change in surface profile of the trees (the new opening). Turbulence strains the exposed trees in a manner that they may not have experienced in the past located within the forest. This may lead to some breakage. Over time the trees typically adapt to the stress and surrounding regenerating trees assume influence and deflect the wind. Disturbance is more likely on exposed terrain features such as ridges. The DOF observed wind disturbance throughout the sale footprint which is typical of old growth timber on karst topography with shallow soil.</p> <p>The previous owner of the lot created a significant opening in the stand on the subject property adjacent to the property line with the state. The state timber proposed to be left along the boundary is a compromise. The opportunity for a visual buffer and transition to the proposed clear cut versus cutting to the property line was discussed with the resident. The latter provides proactive removal of the trees prior to potential wind disturbance but leads to more direct wind on the property and an open setting. The former and agreed to configuration will leave timber remaining and provide both a visual and a possible wind deflection function. Regardless, some of the timber in this retention area will likely blow over.</p>
	Harbor/ Fuel Delivery/ Marine Access Facilities	
Myla Poelstra	The MAF is the only place in the bay for medevac helicopters to land. The question you were asked was whether there would be a place set aside for the community to handle	The MAF is not designated by the USFS (land manager) to serve the emergency medical evacuation mission. While the Marine Access Facility is not designed for emergency access it has served that purpose on several occasions.

Commenter	Comment	Response
	<p>medevac emergencies. Your answer was that you thought DOF could work with that.</p> <p>You told us a large area has to be kept available for trucks to move around and that would be made available for helicopter landings. It has been my experience as the Rescue Captain for the EMS that in an emergency, time is the most critical element in saving a life. Once the Coast Guard helicopter is launched, it takes about forty five minutes for them to be in Edna Bay. Emergencies are obviously unplanned events. If the MAF is plugged with decks of logs and covered with the related debris from timber moving operations there will not be enough time to clear an area for the helicopter to land. You told us you would talk to the Coast Guard and determine how much area is needed for the landing area. Where is the follow up on that question? We were talking about life threatening emergencies.</p>	<p>The DOF contacted the USCG and reviewed the site parameters for landing the typical USCG helicopter at Edna Bay on February 1, 2024. The USCG said the helicopter requires a space approximately 100 feet square to land. Their medical emergency evacuation mission does not require a landing area to be efficiently performed; hoisting is the standard extraction method in remote locations. Landing tends to be avoided in remote sites because it tends to be occupied by unknown people and unsecured objects. Regardless, the footprint area required for landing a MH-60 Jay Hawk helicopter is modeled in Appendix F of the FLUP.</p> <p>EMS traffic will not be obstructed at the MAF by timber operations. There are two distinct routes through the MAF, at least one will be kept free and clear of logs at all times. Timber sale traffic will be contractually obligated to always accommodate EMS traffic.</p>
Caleb J. Kitson	<p>The MAF is the only location near the city where helicopters can land for medical emergencies. In the past three years my own family members have been medevac'd there on three separate occasions. Option #2 proposes that "wood would be decked temporarily at that location and likely moved semi-daily". If wood is decked there at all, it will prevent a helicopter from landing, potentially causing an emergency medical patient to have complications or die.</p> <p>Additionally, activity in that area is not restricted to helicopters. This is part of the main road connecting the East and West parts of the subdivision. Any restriction to</p>	

Commenter	Comment	Response
	emergency traffic such as ambulance or fire could be detrimental to life and property.	
Caleb J. Kitson	This particular location is approximately 560 feet from the City of Edna Bay Public Dock. Mr. Staunton estimated in the January 8 council meeting that the log barge used to transport logs from the MAF would be 300 feet long by 100 feet wide. This leaves little room for the log barge to operate safely around other marine and air traffic regularly coming into the public dock, such as subsistence and commercial fishing vessels, USPS agents, private and commercial aircraft, and fuel barges.	The DOF has represented the anticipated log barge footprint at the end of this Appendix D. Barges typically used for this purpose transport between 200 MBF and 300 MBF of timber. Their dimensions vary but typically are 75 to 100 feet in width by approximately 200 feet in length with a ramp approximately 40 feet long. The log barge will be bearing on the MAF beach under the guidance of a tug married to the rear quarter. The tug will be always in attendance of the barge during loading. Experienced operators will load these barges in 2-3 hours. Loading will typically occur on an incoming tide. The typical layup configuration of the barge to the shore indicates that traffic will be able to transit with adequate clearance to the stern of the barge. The propeller current from the tug may influence but will not hinder traffic within 50 feet of the stern of the tug.
Rodger DiPaolo	Most importantly the MAF-barge and log interaction (I think Greg called it the model of the space) with the US Coast Guard Medical Air Lift, the fuel delivery ship, and Taquan Air (our mail plane), all three arriving at random times and days, is most important. There must be a plan-of-approach for these three entities in place to be able for this plan to use the MAF at all. Stifling any of these services will be very detrimental to the City of Edna Bay. Greg did propose to contact the US Coast Guard and Taquan to discuss the model and I am counting on it.	The log barge traffic is predicted to run once a day between the east and west side of the bay. The tug will be observant out of legal requirements associated with navigability to respect other traffic. Vessels including the barges and aircraft, all need to consider other vessel's restricted maneuverability in their actions. The period for the approach or departure maneuver by the log barge that may infringe on other traffic forms is predicted to take less than 10 minutes.
Caleb J. Kitson	Petro Marine Services in Craig, Alaska delivers fuel to the Edna Bay Bulk Fuel Facility with a fuel barge (Petro Mariner) that measures 222 feet long by 65 feet wide. Safely operating these two large barges in an area approximately 560 feet by 370 feet is a sketchy proposal at best, especially considering that the	The current timber sale operator (Papac Alaska Logging, Inc.) receives delivery of fuel at least monthly from Petro Marine Services in bulk quantities similar in magnitude to the City of Edna Bay's delivery. Logging operations on the east side of the bay will have similar fuel needs as they currently have on the west side of the bay. Coordination with the fuel company is well established using the same delivery system. Coordination with the fuel company for

Commenter	Comment	Response
	fuel barge must be able to make a timely delivery or Edna Bay can not receive fuel.	third party delivery will be stipulated in the timber sale contract.
Myla Poelstra	How many barge loads a day is DOF planning and will there be a vacancy period at certain times of the day? Your answer to this question included probably and maybe. Our Bulk Fuel Facility is serviced by one of Petro Marine's largest barges. They don't like coming into the bay if there is anything in the area that may impede the timeline on delivery or get tangled in the floating fuel lines in that area. Your answer was so indefinite to the questions surrounding the barge loading by the contractor that we have no way to determine whether or not Petro Marine will be willing to continue servicing our facility during the time this timber harvest is taking place.	Log barge traffic will be subservient to the fuel delivery barge due to its hazardous cargo and constrained schedule.
Rodger DiPaolo	**It would be good to point out that logs may not be transported same day by barge to the West Edna Bay Log Transfer Facility (Old LTF). Likely there will be lapses of when the barge (supposed at 300' long) would be away from the MAF for quite some time unloading and returning.	
Caleb	This does not even account for regular floatplanes from Taquan Air in Ketchikan, Alaska delivering mail and passengers within the same area. At the January 8 council meeting, upon request of council member Louise DiPaolo, Mr. Staunton affirmed emphatically "I will talk to Taquan". As of 12:23 PM on January 23, 2024 a Taquan representative stated that "I do not see anything in our email, and I personally don't recall speaking to anybody [from the	The offshore area associated with the MAF provides adequate clearance for an aircraft to taxi between the barge and the public floatplane dock. The barge is not anticipated to encroach on the airplane landing zones which are well to the west in the larger part of the bay. Barge time transiting the general area that may influence a pilot's decision space for landing will be less than ten minutes. The bay provides ample room for accommodating a routing by both the barge and the plane.

Commenter	Comment	Response
	<p>Department of Forestry] about this subject regarding Edna Bay”. Using the MAF in question would effectively shut down all road, air, and marine traffic in the City of Edna Bay for the duration of the timber sale affecting residents’ ability to subsist, earn an income, receive emergency medical care, receive mail, receive fuel, etc.</p>	<p>Upland vehicle traffic in general will need to avoid the area with heavy equipment use because of safety issues. The MAF will be managed to respect the existing mail system constraints. A traffic pattern will be maintained around the active MAF footprint and priority assigned to meeting the postal requirements and obligations for the community’s commerce and wellbeing.</p>
Myla Poelstra	<p>If you move logs from the MAF near the harbor, will Taquan Air still be able to land while that process is taking place? You said at the meeting that whether or not the planes can come and go needs to be modeled and offered to talk to Taquan and get back to us. As the agent for Taquan Air and Postmaster in Edna Bay, it is my responsibility to meet the planes and move the mail. Once they leave Ketchikan, we have about 40 minutes to be on the dock to unload the plane. Federal law requires a chain of responsibility for the mail. I have to maintain a contract and bond to be able to provide this service to the community. If we cannot make it to the dock or the planes are not able to land due to obstructions from the loading operations at the MAF, they will have to return to town.</p> <p>Without certainties from DOF about the amount of area needed and timing for access, Edna Bay will be effectively cut off from our lifeline for mail, groceries and other essential materials that come in on the planes.</p> <p>As you consider the most cost effective approach for DOF to offer this timber sale, shouldn’t you also be considering the impact your decision will have on other businesses and entities that have been operating in this</p>	<p>On February 8, 2024, Taquan Air (Clark Miller, General Manager) and the DOF (Tom Cheney, Forester) discussed the impact that a 45 FT X 165 FT barge to the northwest of the docks would have on mail flight operations to Edna Bay on Kosciusko Island. Clark conveyed to the division that according to the physical maps provided by the DOF (a week prior) he saw no issue with the barge relative to flight operations. The barge stern would be greater than 350 FT from the float plane dock where mail is delivered. The barge would be assisted by a tugboat which would be positioned on its port to maintain a firm hold on the bulkhead. With this information Clark continued to confirm Taquan’s ability to land and deliver mail unimpeded. Mail is delivered to Edna Bay just about every day according to Clark.</p>

Commenter	Comment	Response
	community for decades. What DOF is doing by coming into the heart of the community is unprecedented in its existence.	
Tyler Poelstra	DOF's preferred alternative #2 will block access to the historically unused MAF. This area resides on municipal land, has been historically accessed for public works projects including harbor construction, bulk fuel facility tank staging and breakwater construction. It is also used to store municipal items (used pilings, anchors, chain) with approval of the USFS within the small permitted area they have rights to use, and it provides the ONLY area suitable for emergency helicopter medevac within the City limits. Contamination of the area with debris during and long after this MAF is used will prevent safe access by helicopters.	The MAF will be used for this sale within the permit requirements stipulated by the USFS. The MAF will be left in a condition equal to or better than current conditions.
Rodger DiPaolo	Residents do leave trailers there on the City land surrounding the MAF when our small boats are coming in and out. Otherwise, vehicles and trailers are parked on our private properties. There are several vehicles located in the area of the City land with no authorization (abandoned). If the small boat trailers cannot park in that area, or the use of the soon-to-be-too-steep-boat launch (required for loading the barge), would it be possible that another ramp could be developed for the subsistence fishing boats and parallel parking for vehicle and trailer on a widened road between the Fuel Facility and the MAF.	The timber transfer activity itself is expected to have on a daily and weekly basis opportunities for other marine use of the facility such as boat launching. The staging or storage of trailers at the site while timber operations are present is not prudent.
Caleb J. Kitson	This location also hosts a public boat launch where residents regularly launch boats for	

Commenter	Comment	Response
	commercial and subsistence activities, and haul boats out for repairs.	
	Road Management	
Tyler Poelstra	These are not “Forest” roads inside of our subdivision. They are “community” roads, where 55 people currently live, recreate, work and transit every day (as per the 2022 DCCED population determination, including 14 children). Haul route alternatives #2 and #3 would significantly impact the character of our community.	The public right of ways platted in state subdivisions within the jurisdiction of the City are entrusted to the City to manage for the citizens of the State of Alaska. The authority and purpose were agreed to by the City and assigned by the State at incorporation. The USFS system roads and associated right of ways transiting the area are under separate management authority of the USFS.
City of Edna Bay	Nowhere in this FLUP are there any certainties our city council can count on when undertaking a risk assessment to even offer a meaningful comment. Instead it includes many instances of “if feasible”. This approach by DOF has left the City of Edna Bay with no alternative but to adopt an ordinance to manage those risks ourselves. Please be aware that our local law now includes a section on Timber Harvest; including the requirement for a Timber Transport Permit to use any of the platted subdivision roads in Edna Bay under City management authority.	The DOF has recognized areas of risk in its planning documents. The term “where feasible” is used to indicate risk will be managed to the extent prudently possible. Where some risk is unavoidable, it is minimized and may be mitigated. Since we are conducting an economic endeavor, cost is a relevant metric to consider in terms of feasibility. The DOF takes this approach due to the fluid nature of timber resource development. The DOF recognizes that this paradigm may create apprehension and does what it can to communicate intent. The DOF aims to deliver prudent solutions and will continue to work with the community on resolution of issues. Regardless, a conservative safety approach is fundamental to operations in areas with public access and required in the timber sale contract.
Tasheena Huestis	We at SE AK Marine Transport are in favor of the logging projects. While we understand the fear of sharing the roads with log trucks, we feel strongly the long term benefits outweigh the risks. Without this opportunity it is highly likely the roads will continue to degrade. We feel it is short sighted to ignore the risks of deteriorating roads and the future costs of those projects.	Comment noted, no change required.

Commenter	Comment	Response
	<p>Papac's work also speaks for itself, the roads he's used are in far better shape than the other roads on the island. Potential problems also have potential solutions, such as pull outs and widening of roads.</p>	
City of Edna Bay	<p>We also reiterated our need for continued historical access to the extensive road system on Kosciusko Island to support the subsistence based lifestyle that is necessary for many residents to provide for themselves and their families. Our isolated, remote location and limited local economy makes subsistence harvesting paramount to the viability of the community. Our observations of DOF's interactions with other Prince of Wales Island communities and the apparent disregard for the impact timber harvest will have on the residents living in and around the Southern Southeast Area Forest have led us to believe we have no reason to expect any different considerations for Edna Bay. The simple fact that we had to request a meeting with you in February of 2023 when the FYSTS for Edna Bay Parlay #2 came out speaks to the lack of concern for meaningful dialogue with our community. DOF should have initiated that meeting.</p> <p>“With the number of road closures residents have reported in recent months and lack of assurances in the Preliminary FLUP, there is no apparent benefit for the community to continue with an attitude of cooperation at this time.”</p>	<p>Road closure on federal land was performed based on the federal decision document for the Kosciusko Vegetation Project, the USFS transportation plan and specific direction of the USFS. No USFS “system” roads were closed. Only temporary roads constructed by the timber purchaser have been closed to highway vehicles. Significant highway vehicle access remains to the Kosciusko GNA timber sale area via forest service system roads reconditioned and improved during this timber harvest.</p> <p>On State land the Alaska Forest Resources Act requires the DOF to address road management with respect to maintaining water quality. As a land manager for the State we are also charged with taking care of the road assets to preserve their value and usefulness. The State mainline roads in general will remain open as long as we have funding for feasible management. When DOF lacks the resources to take care of a state road asset, we put the road in a storage state that is described as “closed to highway vehicle traffic”. The BIF describes this overall intent; the FLUP describes the specific decision horizon at the time it is adopted.</p> <p>The DOF considers the FYSTS to be a scoping activity; we typically do not have meetings during that phase in communities unless specifically requested. Regardless, the DOF met with the community via the City Council as requested during the FYSTS public notice period. The DOF has extended itself to the mayor and participated in city council meetings during most of its planning processes previously conducted on Kosciusko. As interest is apparent</p>
Brian Poelstra	<p>I would also like to say that the access agreements that Edna Bay residents had under the Forest Service in regard to leaving</p>	

Commenter	Comment	Response
	<p>identified roads open has not been continued under the DOF through the GNA. This is really unfortunate for me and others who live as close to a subsistence hunter/gatherer lifestyle as we can out here to lose access to the now not only logged areas, but also some of the roads through them to remaining intact forest. When I read "If feasible" at certain points within this forest land use plan I know that means it is at best a very loosely implied intent which can't be counted on going forward.</p>	<p>and we have staff time to do so, we are very interested in meeting with the communities we operate around.</p>
<p>Brian Brown, Alcan Timber Inc.</p>	<p>ALCAN requests that new roads built for timber harvest remain open for use by residents of the City for an indefinite period. Access to an area with reliable communications access is important for isolated community. Access to firewood is also desirable.</p>	<p>Comment noted, no change required.</p>
<p>Clarence Clark, Alaska Forest Association</p>	<p>AFA requests that new roads built for timber harvest remain open for use by residents of the city for an indefinite period. Access to an area with reliable communications access is important for isolated communities. Access to firewood is also desirable.</p>	
<p>Rodger DiPaolo</p>	<p>Many areas left behind after logging operations have affected the resident's access to areas they had regularly visited. The areas along Kosciusko are of that kind. In the past, abandoned roads allowed residents beyond the three-to-four mile Community Road which helped us gather wood, gather berries, mushrooms, and gave us access to wildlife trails for hunting. It is important that the residents continue to be able to use public access roads to all these places. In this case, we are imploring that the State allow us to travel</p>	<p>Comment noted, no change required.</p>

Commenter	Comment	Response
	on the new road for Parley II. It offers the best connection with a cellular tower located on Ratt Mountain.	
Rodger DiPaolo	Though we know that this is one season of logging Parley II on Schedule 2023-27, there will be more logging east of the city, as most of the island is east of the city. Therefore this could indicate more vehicles and more logging in this Schedule and future Schedules. This could also mean that for the sake of efficiency Sealaska Corporation's approximate 12,000 acres of logging operations could choose to use this shorter route to the East Edna Bay Marine Access Facility when convenient.	Comment noted, no change required.
Clarence Clark, Alaska Forest Association	The use of timber value to improve road conditions and provide needed road maintenance is appropriate especially within a small city such as Edna Bay.	Comment noted, no change required.
Brian Brown, Alcan Timber Inc.	The use of timber value to improve road conditions and provide needed road maintenance is appropriate especially within a small city such as Edna Bay.	
Brian Brown, Alcan Timber Inc.	The Preferred Alternative in the draft BIF includes the use of the USFS MAF at the east side of the bay. ALCAN request that the DOF obtain any and all necessary permits from the USFS instead of requiring the timber sale purchaser to obtain a special use permit from the USFS to use the MAF. Could it be possible to amend the road use agreement for the Kosciusko Good Neighbor Sale to include the use of the MAF and extend the agreement until the ending date of the Kosciusko East Timber Sale? Historically, Road Use agreements have	The DOF will continue to work on this issue. This topic requires concurrence of several managing agencies that may have differing priorities.

Commenter	Comment	Response
	been hard to obtain from the USFS and even harder to obtain at a reasonable cost.	
Clarence Clark, Alaska Forest Association	The Preferred Alternative in the draft BIF includes the use of the USFS MAF at the east side of the bay. AFA request that the DOF obtain any and all necessary permits from the USFS instead of requiring the timber sale purchaser to obtain a special use permit from the USFS to use the MAF. Could it be possible to amend the road use agreement for the Kosciusko Good Neighbor Sale to include the use of the MAF and extend the agreement until the ending date of the Kosciusko East Timber Sale? Historically, Road Use agreements have been hard to obtain from the USFS and even harder to obtain at a reasonable cost.	
	Traffic Safety/ Existing Traffic Access	
Scott Brandt-Erichsen, City of Edna Bay Attorney	<p>The City has asked me to make clear to the DOF that the City concern for the safety of its fuel storage facility and the safety and condition of its roads for use by citizens is a matter of substantial concern affecting the health, safety and welfare of the public. You may not be aware that under AS 40.15.030 and AS 29.35.260 the City has the authority to exercise all powers not prohibited by law, which includes the authority to regulate traffic on City rights of way within their jurisdiction, such as Kosciusko Drive.</p> <p>The City has recently adopted an ordinance requiring a traffic safety plan approved by the City prior to beginning harvest operations using City roads. The City has asked me to advise you that, should the DOF issue a decision or contract for a timber sale which</p>	<p>Thank you for the context of the code development. The DOF plans to coordinate with the City regarding timber sale activity.</p> <p>Timber harvesting activity shall conform to the BIF decision and the site-specific resource decisions of the FLUP. The DOF controls and administers state timber sales based on state statute and regulation, the decision documents, as well as contractual obligations with the purchaser. In turn, we require specific content in the purchaser's operating plans based on their proposed methods and means used to execute the contract.</p>

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	<p>requires a traffic safety plan under the City ordinances, and fail to obtain a permit from the City for use of its roads prior to operations, the City intends to seek injunctive relief to prevent operations using City roads without a permit, if required, and will seek damages from the responsible parties for any damages to the City property, whether the State, the timber contractor, or both. If the DOF harvest plan only uses roads which are not under the City's jurisdiction and regulatory authority, there may not be an issue, but if City roads are used, then the City ordinances must be followed. Even in the absence of City regulatory authority, the risk to public health and safety from heavily laden trucks traversing such a steep grade adjacent to the City fuel storage facility would pose an imminent threat to public health and safety which would call for injunctive relief absent appropriate protective measures. The City hopes that DOF pays appropriate attention to these public health and safety concerns and incorporates the City traffic plan requirement into any decision or requires timber harvest traffic to use a route which does not require a City permit.</p>	
Rep. Rebecca Himschoot	<p>In speaking with community members about this sale I was encouraged to hear there seems to be no opposition to the sale. However, the community has expressed strong concern regarding loaded logging trucks transiting through town. These roads are narrow and regularly used safely by personal vehicles at slow speeds, as well as pedestrians. The community works hard to keep these roads well maintained.</p>	<p>Comment noted, no change required.</p>

Commenter	Comment	Response
Michael Williams	<p>Even worse than the risk mentioned above, it would be an even greater danger to community members in Edna Bay who use this road on a daily basis for livelihoods and commutes. Point in fact, there are 10 residents that use this subdivision roadway to travel to and from their homes daily, including young children and senior residents. Every day. There is no other way in or out for them. You are telling our community that your logging trucks, while utilizing this steep hill, will only travel at 15 miles per hour, and you think this is safe. However, we do not agree. The people of Edna Bay have no other choices but to use this road. You DO have a choice though. Yet it appears you are not willing to exercise your choices and spend the money to put in a road in a safe area other than Kosciusko Drive.</p>	<p>The DOF proposes to mitigate conflict on the portion of the 1525 road running through the subdivision by restoring the surface profile, add pullouts of 24 feet in total width by 100 feet in total length at several locations to provide traffic relief for opposing traffic and clearing vegetation within the right of way where it is beneficial to improve sight lines. Speeds by log trucks on the 1525 through the subdivision section will be contractually limited to 10 MPH.</p>
City of Edna Bay	<p>Two of DOF's proposals for transporting the timber from the 185 acre sale on the east side of Edna Bay appear to completely ignore the valid concerns that have been expressed in previous comment letters. The threat to our children, infrastructure and livelihood's by bringing logging trucks into the subdivision is not acceptable and should not even be considered as an option in the Preliminary FLUP.</p>	<p>The DOF, through a public planning process, has worked to consider viable options and the concerns brought forward by the community. The haul routes proposed have merits and detriments depending on the viewpoint of the reader. The DOF has represented them in the process of picking the preferred alternative and decision.</p>
Tyler Poelstra	<p>DOF's preferred alternative #2 cannot feasibly address the traffic pattern issues it presents at the roadway junction to the City Bulk Fuel Facility, Harbor and Float Plane float. The amount of public traffic here should not be adversely impeded, and heavily loaded, essentially un-stoppable trucks coming through</p>	<p>It appears feasible to widen the road for additional traffic clearance as part of timber sale development. Timber sale traffic can adjust travel times in response to published access to the fuel farm. It is our understanding that the fuel farm is open several times a week. Increasing the parking area may also be possible to the west of the existing parking stalls at the top of the harbor ramp.</p>

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	this area day in and day out is almost certainly leaving the public open to a vehicular collision.	
Tyler Poelstra	DOF's preferred alternative #2 offers no credible protections for the public who live on and utilize Kosciusko Rd. to access their property and essential municipal facilities on the East side of Edna Bay.	The contractor will consider existing uses, known risks and emergency response. Existing residential access will not be diminished for significant time periods. Throughout construction, some travel delays may occur for residents. School times, mail delivery schedules, fuel farm hours and other similar existing patterns will be respected; when this is not achievable, notice will be provided, and alternate functional access provided. Existing side roads and driveway locations will remain, modifications will be mutually agreed to with the managing authority as appropriate. Intersection geometry shall be equivalent in function or improved over present conditions. The DOF will work with lot owners and the City in these efforts.
Myla Poelstra	How are people from the side streets on Kosciusko Drive going to move around? There are seven homes on those side streets, six of which have year round occupancy. How is DOF going to avoid destroying existing driveways and roads to those residences? Your answer was that DOF has not progressed with their design enough that you could say for sure. Shouldn't this question have been anticipated and addressed before the end of this comment period?	
Rodger DiPaola	The road is incredibly steep and dangerous, as a matter of fact it is the most steep and dangerous road in, or near the vicinity of, the city of Edna Bay. I cannot foresee the road being able to be used safely by logging trucks without a nearly complete rebuilding of this road which I have no assurance would not negatively impact my ability to use during it's construction and while being used by logging trucks. As of today no detailed plan nor schedule as to what any possible road rework would be done has been delivered from the Alaska DOF to the City of Edna Bay for us to review, therefore, as stated above, I have been given no assurance that any road work done to Kosciusko Drive will not negatively impact my family and/or my property – and I	

Commenter	Comment	Response
	currently believe that it would have a very high probability of doing so.	
<p>John Helliwell</p> <p>Alaska Music Wood Industries</p>	<p>Alaska Musicwood Ind is a small family-owned and operated company that consists of four of us, with over 50 years combined commercial driving experience, the business has been active for 13 years hauling logs on Prince of Wales, AK. It has been brought to my attention that the town of Edna Bay has some concerns with a certain hill in relation to hauling logs from upcoming Kosciusko East Timber Sale. Mike Papac, of Papac Alaska Logging, asked if I would go look at it and give my opinion regarding the concerns that have been brought to the attention of the State Forester in multiple letters during the comment period of the sale. I have personally reviewed the hill above the Edna Bay Fuel Facility with next most experienced driver, my brother. We discussed the grade, condition, and the fuel depot at the bottom. Let us start with the grade of said hill. We see no concern in the grade; yes, it does have some areas that carry a decent percent, but nothing that we have not seen or negotiated in the past. In fact, on another area of Kosciusko Island, we just hauled this month, without issue, on a hill of comparable grade in Unit 5B of Edna Bay Parlay 2 Timber Sale. The hill above the fuel farm has relief areas (like stair steps) that will allow the truck to keep a safe and prudent speed without any use of brakes. Our trucks are equipped with Maxi air brakes on the truck and trailer as well as an engine brake. The engine brake will hold the truck back without the use of brakes on 99% of the hills we encounter. The maxi brakes are engineered to go to full park in the event of a catastrophic loss of air, which will stop the truck within feet of being engaged. We always put safety first and negotiate obstacles like this with extreme caution and would be at a crawl, low gear and slow speed, as we proceed down the hill thus to eliminate any chance of a mishap taking</p>	<p>Comment noted, no change required.</p>

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	<p>place. I have my family driving the same roads as I am so I will not take chances of any kind if I were to feel the road would be too hazardous for us to navigate safely. I personally inspect all my trucks and trailers daily as per state and federal commercial vehicle guidelines. If a truck is deemed unsafe in any manner it is removed from service immediately and fixed properly before being put back in service. We are professionals and take our job serious.</p>	
<p>Tyler Hartley Tyler Hartley Trucking</p>	<p>This letter serves as my professional opinion regarding the safety of hauling logs on the road that passes through the community of Edna Bay on Prince of Wales Island. I have 45 years of experience in driving logging trucks, 30 of which are as an owner/operator. Our drivers are required to have a minimum of five years of driving experience. The drivers that are currently employed in my company have a combined driving experience totaling over 42 years.</p> <p>After conducting a thorough inspection of the road and hill in question, I have determined that the 20% grade on the hill next to the fuel tank facility does not pose any superfluous risk or complication to the proposed haul. Nothing about the route or hill presents any unusual hazards, wear and tear, or safety concerns for the drivers, trucks, or Edna Bay citizens. Tyler Hartley Trucking, as a logging truck company, regularly transports on logging roads with much steeper grades than the hill in question. To ease concern in the community, I would like to point out that our trucks are tri-drive trucks and trailers, which are designed to haul 100,000 lbs. on uneven terrain. The net weight of each load we haul under this contract is at</p>	<p>Comment noted, no change required.</p>

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	<p>most 50,000 lbs., increasing the safety of the haul even further. Additionally, each truck is equipped with braking systems on each axle, including service brakes and maxi/spring brakes. Each truck is also fitted with brake-saver systems on the engine. Per our company policy, mechanics and drivers are also required to inspect all braking systems and equipment routinely, and drivers perform walk-around inspections and wrapper checks for each load they haul.</p> <p>Tyler Hartley Trucking always works closely with the logging companies we contract with to manage risk, maintain safe conditions, and repair areas of concern regularly.</p>	
	Operation Hours	
Rodger DiPaolo	<p>Please clarify “the haul route” of “this additional road” being typical traffic at the beginning and end of the day. I was under the impression that this operation would be daytime hours and the plan outlined the residents use at the beginning and end of the day. I think it likely that it will happen simultaneously. But noise is now a factor for me after learning the number of trucks during possible sleeping times.</p>	<p>The traffic common to all alternatives introduced at the beginning of PBIF Section V, E, (4) refers to logging personnel commuting between the existing camp area adjacent to the State LTF on the southwest side of the bay to the proposed timber sale. This traffic would likely take the form of light duty trucks and possibly a crew boat.</p> <p>Typical hours for logging and roadbuilding operations on their own recognizance start earlier than 0600, and rarely extends past 1600 hours.</p> <p>The DOF has restricted operating hours in contracts in similar situations for noisy activity and equipment (hauling, blasting, cutting, etc.) within one quarter mile of a residence from 0600 to 2200 hours. It is a reasonable request within the subdivision to limit significant noise producing activity outside this window.</p>
	Specific Route Discussion	
Brian Poelstra	<p>Unfortunately, it seems that Haul Route Option #1 is too expensive to consider for a sale of this size. However, if the community of Edna</p>	<p>Comment noted, no change required.</p>

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	<p>Bay could secure an access agreement after the logging was completed, it would surely add major ongoing subsistence benefits to people who live here by way of motorized access past Trout Creek. Also, I believe it would benefit future forest management interests and arrest any safety concerns to the public during the logging operation.</p>	
<p>Brian Poelstra</p>	<p>Haul Route Option #2 seems reckless to me, as it requires going down what we here locally call "Morgan's Hill". I am very concerned about this. First, that road was carved out by locals in Edna Bay using grant moneys to create an ATV or light truck access at best. It's not built like a mainline logging road, and the grade is quite steep (20%+). Further, the community has its hard-earned and long worked for bulk fuel facility directly at the bottom. I've driven a log truck for years and I know for a fact that jake brakes can stop working randomly, drive lines can snap, and loads can move or shift on major incline. That being said, even going up the hill empty would require some significant improvement to that road, since it's too steep for good traction even when dry. I don't believe you can use that road safely to access the MAF, let alone address the concern to the bulk fuel facility. Furthermore, using the MAF to transfer logs via barge to the LTF daily or even every other day would be a train wreck for the many users of the tank farm, dock, emergency services and locals coming and going. Given how inclement weather could affect the entire process proposed in this haul route, I don't see it as tenable.</p>	<p>The road referenced was developed by the USFS who the managing authority is also. The grade of the road has been surveyed. The reconditioned road shall be under 20% grade and will be within the OSHA logging road constraints. The operating envelope of the available log trucks has also been considered.</p>

Commenter	Comment	Response
Brian Poelstra	<p>Haul Route Option #3 I am completely opposed to. We have children and elderly using the 2.8 miles of "Public road" on a daily basis, and I am worried about their safety with the number of trucks that would likely be required to run nearly around the clock. Moreover, I expect the potential for impedance to emergency response and essential services within that roadway during hauling time would be high. The disruption from the sound of jake breaks 14–15 hours a day through the heart of Edna Bay would also be a factor on the health of residents.</p>	Comment noted, no change required.
Caleb J. Kitson	<p>Haul Route Option #3 proposes to haul timber through the subdivision of Edna Bay. Edna Bay is a residential and agricultural community, with children playing near roads, and agricultural activities regularly occurring on city roads. I personally have two parcels that are operated as farms on the main road (Davidson Ave) both for subsistence and market. I regularly operate farm vehicles between my parcels, as well as drive livestock on the road on foot daily between parcels. Sometimes my children drive livestock on the road as well. I personally know of three other families engaged in agricultural activities who also use the roads in this or similar manner. Most residents also engage in subsistence harvest of berries and medicinal herbs along roadsides, especially the main road, from spring through late autumn each year. Regular log truck traffic would impede our ability to operate our farms effectively and harvest subsistence foods and medicines, as well as impede emergency vehicles, and could put</p>	Comment noted, no change required.

Commenter	Comment	Response
	adults, children and livestock at risk of injury and death. As with Haul Route Option #2, Option #3 must also include a Timber Transport Permit (TTP) from the city that addresses these concerns satisfactorily.	
Brian Poelstra	Haul Route Option #4 seems to me to have the most merit for all users. I understand the economic scope would be more difficult but as stated this route would remove the safety concerns from option #2 and #3 as well as the logistical issues associated with them. I feel restoration of the 1520500-road system would benefit the public, hunting and subsistence access, as well as future forest management. Furthermore, I'm also surprised of the concern for how steep some of the portions of the 1520500 road are when route #2 requires the use of "Morgans Hill" which by comparison was not built as a mainline road nor as a hauling road as opposed to 1520500. I can acknowledge the support of trucks over such a long haul each way would be a challenge for the operator, considering how short hauling has been for all other recent sales on the island.	Comment noted, no change required.
Caleb J. Kitson	Haul Route Option #4 uses no City of Edna Bay roads, and therefore to my knowledge at this time would not require a TTP. However along the Southeast State Forest Road lies what is locally known as "Carwash Springs". This is the community's primary drinking water source. Log traffic would significantly impede residents' ability to fill water containers for drinking, washing dishes, bathing, and washing laundry (an activity most residents must complete daily). Additionally, Option #4 includes the use of the MAF which	Comment noted, no change required.

Commenter	Comment	Response
	as is mentioned in paragraph five of this letter is in my opinion entirely unfeasible and unsafe.	
Rep. Rebecca Himschoot	Due to the narrow and hilly nature of the roads in town, I support the community's concerns surrounding the safety of drivers and passengers in personal vehicles as well as pedestrians with heavy logging and equipment trucks using the roads in town multiple times a day. I understand there is an alternative road that could be used to move the logs and if this road is utilized, the community, the Division of Forestry, and the timber company might all be served. At a minimum, the state should comply with the local code governing road use and timber harvests.	Comment noted. The DOF considered this route in the initial scoping. We have added information in the "Existing Haul Routes Examined" section of the BIF document for reference and named it Route #5.
Rodger DiPaolo	<p><i>The author clarifies his reference to a preferred haul route he mentioned in the City council meeting. "The trucks if righting out of the Parley II logging road (north or northwest) on 1525000, left on 1520500 Road and at the one-mile mark (or so) taking a left (southwest) 1520000 Road to the "community road" to stop for right of way. Then merging back onto 1525000 to approach within hundreds of feet to the MAF. Please see my drawing on the Appendix A3. I call it Haul Route #5.</i></p> <p>When the logs are unloaded on the City land near the MAF, 1525000 (Kosciusko) they drive empty past the secure Fuel Facility and up to the Parley II road. This would be a circular, one-way route in order to keep the loaded logging trucks of-great-weight from coming west on 1525000 directly down toward the City's (less secure) fuel facility plus save the few residents along the road from not</p>	

Commenter	Comment	Response
	hearing Jake Brakes as would be likely in Haul Route #2.”	
Tyler Poelstra	Suggestion 1: I propose the Division of Forestry repair and utilize USFS Road 1520500 and come down loaded and return empty on USFS Road 1525 to make use of the USFS temporary permitted Marine Access Facility, effectively creating an “Haul Route Alternative #5”. This would completely mitigate the risks to the bulk fuel facility, residents on Kosciusko Rd., and access to the Harbor and float plane facility. The only remaining item of concern that could potentially be addressed with a communicated plan is emergency access to the MAF for patient medevac.	
Brian Poelstra	I feel like there was a missing option to not use "Morgans Hill Rd." but instead come across what we call the "5 Mile cut across" and down the NF-1525 to the MAF through actually decent road of an appropriate grade for log hauling to the MAF. It's net 8 miles longer than coming down "Morgan's Hill" to the MAF but it would address most of the safety concerns plus it would be the next shortest haul option?	
	Fuel Facility	
Michael Williams	<p>My name is Michael Williams and I am a thirty year resident of Edna Bay, AK. I live directly adjacent to Kosciusko Drive, the road leading down from this timber sale to the Log Landing.</p> <p>I have some strong concerns about using this road to move logs. I have always been a supporter of logging. However, it is my opinion that it is too great a danger to our fuel</p>	<p>Fuel handling and safe storage is a significant performance requirement in the timber sale contract operating plan. Activity around hazardous substances such as the fuel facility will appropriately consider the facility, the user and the environment’s vulnerability.</p> <p>Referencing the original federal land patent to the state, FDR 1525 is a reserved private federal road. Jurisdiction for it resides with the USFS. Subsequent conveyances to the City</p>

Commenter	Comment	Response
	<p>tank farm and community for you to use this road to commute logs. It would absolutely devastate our community if a runaway truck were to hit our fuel tank farm.</p>	<p>and others are burdened by this reservation. Unless delegated by the USFS, FDR 1525 is not within the City’s road management authority.</p>
<p>Caleb J. Kitson</p>	<p>My most pressing concern is the risk to the Edna Bay Bulk Fuel Facility. The plant capacity as stated on the City of Edna Bay website (cityofednabay.org/bulk fuel) is as follows: 4,000 Heating Oil (#1 ULSD), 12,000 Gasoline (UNLD), 20,000 Diesel Fuel (#2 ULSD). According to the Preliminary Best Interest Finding and Draft Forest Use Plan for Kosciusko East Timber Sale SSE-1384-K “Haul Route Option #2”, logs would be hauled from the timber sale area to the East Edna Bay Marine Access Facility (MAF). This would require commercial log trucks to operate on City of Edna Bay roads on grades steeper than approved for commercial vehicles. The terminus of one such grade is at the Edna Bay Bulk Fuel Facility. A runaway truck on this road could feasibly collide with the Fuel Facility, potentially causing loss of life, serious bodily injury, damage to homes and boats in and around the harbor, and an environmental catastrophe. An explosion could destroy homes and boats in and around the harbor, and a fuel spill of that magnitude could destroy the subsistence fisheries the residents of Edna Bay lean heavily on for their year-round food supply. While Mr. Staunton dismissed this concern at the January 8, 2024 Edna Bay council meeting by saying log truck operators are “professional drivers”, the reality is accidents are not uncommon with log trucks and a broken drive line, or steering or brake</p>	<p>The DOF is working with the USFS Engineering staff to apply prudent specifications for reconditioning the road and the associated use. The road reconditioning intent is stated in the FLUP, and the final set will be part of the performance requirements of the timber sale contract. A draft version of the plan set is attached to this BIF. The grade of the road will meet OSHA and USFS requirements for log hauling.</p> <p>Commercial trucks on that route will be required to operate at 10 MPH from the top of the hill to the MAF; that provision will be stipulated in the timber sale contract.</p> <p>Regular inspection protocol for the commercial log trucks and dump trucks associated with this timber sale will be equivalent to State highway requirements and agreed to in the approved operating plan. Adherence and proof of execution by the operator will be part of the performance requirements of the contract operating plan. Failure to document and maintain trucks to the agreed standard will be considered a default of an emergency nature requiring applicable operations to immediately cease, until satisfactorily resolved.</p>

Commenter	Comment	Response
	<p>failure could result in a catastrophic event for residents of Edna Bay, the logging company, and the State of Alaska.</p>	
Myla Poelstra	<p>Is the State going to be able to put in some protection for the Bulk Fuel Facility from a 100,000 pound, loaded runaway truck? Your answer was that there is no way to build effective containment to keep the truck on the road, and told us there are different design elements on the road curve that would help the driver contain the load, and that the speed coming down the hill would be 15 mph. You were supposed to get back to us with diagrams and information for DOF's proposed road changes.</p> <p>How many truck loads are we looking at to move the timber? Your answer was about 1,400. For us, that means 1,400 chances that something could go wrong. We have talked to people who work in the timber industry and they have told us there is no way for a contractor to anticipate a drive line snapping or other mechanical failure that could prevent the driver from avoiding a collision with our 36,000 gallon tank farm that you know sits directly at the bottom of the steep hill in DOF's favored alternative Option #2.</p>	
Tyler Poelstra	<p>DOF's preferred alternative #2 offers no protections for the 36,000 gallon bulk diesel and gasoline storage facility at the bottom of Kosciusko Rd., and efforts I have made to open a dialog with the USFS to install barriers and protection mechanisms for the facility if this road were proposed for commercial use have been abandoned without formal notice to the City. Risk of a runaway truck or log hitting</p>	

Commenter	Comment	Response
	<p>what amounts to a massive bomb / environmental catastrophe at the bottom of the hill is not acceptable.</p>	
Rodger DiPaola	<p>At the bottom of the hill on Kosciusko road exists a sharp right turn towards the MAF, below which adjacent to the waters of Edna Bay, is located the Edna Bay fuel depot containing tanks holding tens of thousands of gallons of gasoline and diesel fuel. The residents of Edna Bay are dependent on this depot for providing the fuel we need for our vehicles and to generate electricity and heating for our homes. Should an accident happen, such as a runaway truck coming down the hill loaded with logs, there is no small probability that it would crash into the fuel depot. If such an incident occurred it would likely cause:</p> <ul style="list-style-type: none"> • Loss of life and or serious injury, contamination of the waters of Edna Bay which would make it unsuitable for the subsistence fishing needed by local residents for food • Degrading or halting the ability for use of the city marina and / or float plane dock which is adjacent to the fuel depot and through which all transportation of people and goods to and from Edna Bay pass • Removing the ability of Edna Bay residents to reliably acquire the fuel they need on a daily basis for transportation, heating of their homes, and providing electrical generation for their homes which among other things includes both regular and emergency communications 	

Commenter	Comment	Response
	<p>And could possibly cause:</p> <ul style="list-style-type: none"> • Cutoff of the only route to the tsunami escape location for the residents of Edna Bay (top of the hill on Kosciusko Drive) • Damage to my home or property and putting my wife and I at risk due to our close proximity to the fuel depot • Loss of our ability to travel on the only road access from our home to any necessary services in Edna Bay, including access to the emergency helicopter landing pad at the MAF <p>For the above reasons I realistically have no other choice than to oppose the Kosciusko East Timber Sale (SSE-1384-K) as it is currently planned.</p>	
John Helliwell	<p>I understand the concern about the fuel farm from the community members of Edna Bay, but I cannot see how we would have any situations that would jeopardize it at all. It has a buffer of trees in front of it, the natural valley of the hill diverts probability and in the extremely unlikely case of a run-away truck, we have discussed our priorities to always aim for the ditch opposite danger. We prioritize safety above all.</p>	<p>Comment noted, no change required.</p>
	Streams/ Fisheries	
ADF&G Mark Minnillo	<p>There is one cataloged anadromous stream known locally as Hamlin or Buggy Creek (103-90-10610) located on the northeast boundary of the timber sale. A timber retention area of 100 FT or more was flagged on the south side of the creek using pink timber boundary ribbon and stream retention course ribbon (blue/white stripped) tied together.</p>	<p>Comment noted, no change required.</p>

Commenter	Comment	Response
	Riparian habitat function related to this waterbody will be maintained with this timber retention area.	
	Wildlife/ Subsistence Hunting/ Cumulative Impact/ Carbon Sequestration	
ADF&G Mark Minnillo	ADF&G staff do not have any records of known black bear or wolf dens in the area.	Comment noted, no change required.
ADF&G Mark Minnillo	ADF&G staff assessed deer harvest in the area. Deer harvest is recorded by coarse geographic scales known as Wildlife Analysis Areas (WAA). This timber sale unit is in WAA1525 which is 331 km ² (81,873 acres), roughly half the size of Kosciusko Island. In the past ten regulatory years (2012-2023), <1% of total annual harvest in Game Management Unit (GMU) 2 and ~57% of annual average deer harvested by Edna Bay residents occurred within this WAA. The quantity of harvest that occurred within the exact area of this proposed timber sale is unknown. However, residents of Edna Bay may deer hunt here due to its close proximity to their community.	Comment noted, no change required.
ADF&G Mark Minnillo	The proposed timber sale will remove wintering deer habitat and may negatively influence other old-growth obligate species that rely on similar habitat. Much of the area surrounding this proposed cut has been clearcut in the past and is in stem exclusion. Further clearcutting in the area may reduce wildlife habitat quality in the proposed area. Due to the logging legacy in the area around the timber sale, wildlife populations may be impacted locally with this additive loss of habitat, in particular higher quality winter deer habitat.	Comment noted, no change requested or required.

Commenter	Comment	Response
Katie Rooks, SEACC	<p>SEACC opposes this sale in its entirety. Old-growth forests are key in the climate crisis, as numerous sources have verified. Additionally, the Tongass and regional Alexander Archipelago old-growth forests in various ownerships are key biodiversity areas containing endemic populations of threatened and/or endangered animals. The State of Alaska is required to manage all of its natural resources for long-term sustainability in the best interests of Alaskan residents.</p> <p>Due to continued logging and road building on multiple ownerships, including U.S. Forest Service land, Alaska Native corporation land, University land, and Mental Health Trust land, remaining old- growth forests on Prince of Wales are becoming increasingly depleted and fragmented, resulting in a significant loss of habitat that is important for many species. Old-growth forests provide essential habitat for deer, bears, wolves, martens, flying squirrels, and goshawk, among others, as part of a complex ecosystem that also supports thriving watersheds for salmon habitat. The nature of island ecology is that species are confined and cannot travel to new habitats, risking extirpation and irreversible loss of biodiversity.</p> <p>Alaska Constitutional mandates for management of the state’s renewable resources dictate that these resources must be used in a way that keeps them sustainable. State forest land must be managed under the principles of multiple use and sustained yield. The DOF has an obligation as a forest lands manager to</p>	<p>The project is on Kosciusko Island to the northwest of Prince of Wales Island.</p> <p>Timber Cruisers did not make habitat determinations, they reported observations of the terrain, forest structure and overall setting based on their experience and training as forest management professionals. Statements of function and value have been made by ADF&G. ADFG did not state that there was a concern for threatened or endangered species. They did indicate that higher quality winter habitat would decrease with the harvest of the timber and may impact deer populations. They did not describe the timber as necessary for sustaining specific species viability.</p> <p>The primary purpose for the Southeast State Forest is “timber management that provides for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources” (AS 41.17.200(a)). The Division of Forestry will actively manage the Southeast State Forest as a “working forest” consistent with the principles of multiple use and sustained yield. A “working forest” means utilizing forest resources to create jobs and support healthy communities through active forest management, while protecting fish and wildlife habitat, providing the public with recreation and other multiple use of state land, and maintaining public benefits such as clean air, land, and water. Public uses of the state forest land and its resources, including timber, fish and wildlife, and minerals, will be restricted only when necessary (AS 41.17.200(b)).</p> <p>Selling carbon credits has not been implemented by the State. It is the DOF’s perspective that the management of forests, a part of which may be their harvest and use, is appropriate regardless of the need to sequester carbon. States with comparable carbon programs authorized in statute for the voluntary market indicate that large amounts of land are</p>

Commenter	Comment	Response
	<p>manage its land for all its values in a way that recognizes that the trees are just one component of a highly interdependent ecosystem. For the harvests proposed, the DOF should take a “hard look” at the effect of their plans on deer populations and subsistence users, as explained by Alaska Fish and Game scientists:</p> <p>Prince of Wales Island has the highest amount of total productive forest in Southeast Alaska (USDA 2016). However, POW received the most substantial logging activity in the region since 1954, which resulted in a 94% reduction of contiguous high-volume forest (Albert and Schoen 2013). This logging activity has reduced deer habitat in north central POW by 46% and in south POW by 18% (USDA 2016). Commercial logging has greatly altered forested habitat and human access in Unit 2, ADF&G estimates about 475 mi² (1,230 km²) of forested deer habitat has been logged over the past 50 years, including over 40% of the old growth forest once found in Unit 2. Logging [and] associated road building in Unit 2 has created the highest density of roads in Southeast Alaska, with approximately 4,000 km (2,500 miles) of drivable roads on national forest land and native corporation lands...As clearcut logging continues to reduce old-growth habitat in Unit 2, deer populations are expected to decline. ADF&G has identified serious concerns about the deer population on POW linked to stem exclusion, as dense stands of young growth replace what once was old-growth and then become clearcut openings.</p>	<p>typically needed for carbon marketability and to cover the costs of inventory and administration. Given the historical importance of timber harvest in the Tongass Archipelago, it is not prudent to forgo timber harvest with such a small land base as currently residing in the Southeast State Forest.</p>

Commenter	Comment	Response
	<p>The science and evidence predict this impact on deer populations will worsen over the next decade. If the Alaskan public resoundingly opposes such timber sales, as has been the case on Prince of Wales for a number of years, how can the State continue to claim that those sales are in the “best interests” of the State? If the sales don’t benefit State residents, who do they benefit? If timber sales cause harm to residents, what “best interest” are the sales fulfilling?</p> <p>Once again, the Division of Forestry has inaccurately portrayed conditions on the ground as it did with the Whale Pass and El Capitan timber sales (2022 and 2023). SEACC categorically protests using timber cruisers and data gathered during timber cruises to provide this information, on the basis that timber cruisers have a vested interest in getting a timber sale approved and may inaccurately characterize what they see on the ground due to bias. ADF&G scientists should be directed to spend time on the ground for each and every Prince of Wales timber sale, as the issues with wildlife habitat impacts are increasingly contentious with Island residents. The Division of Forestry has seen a marked increase in public opposition with POW timber sales in the past few years. Hundreds of comments opposing the Whale Pass timber sale were received. Yet the Division of Forestry continues to ignore residents in favor of the timber industry, ignoring unfavorable timber market conditions, economically superior alternatives to old-growth logging such as carbon sequestration, pleas of impacted</p>	

Commenter	Comment	Response
	<p>communities and residents, and national data and direction regarding the value of old-growth forests.</p> <p>SEACC hopes that the Division of Forestry seriously considers the negative impacts it is having on Prince of Wales Island residents with its current plans to log what little old-growth timber is left. We believe that carbon sequestration is much more economically viable for the state in terms of a long-term resource management plan that actually benefits residents.</p>	

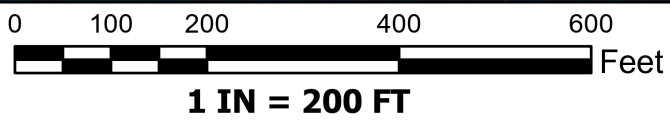
Attachments:

- Site Model of Typical Log Barge at Edna Bay MAF (one page)
- Site representation of potentially suitable USCG helicopter landing area at Edna Bay MAF (one page)
- Existing centerline plan, profile and draft design of the 1525 Road from the SESF to the Public Float at Edna Bay (one page)



EDNA BAY

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



PROPOSED BARGE SITE KOSCIUSKO ISLAND EAST TIMBER SALE





Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



1 IN = 200 FT

Legend

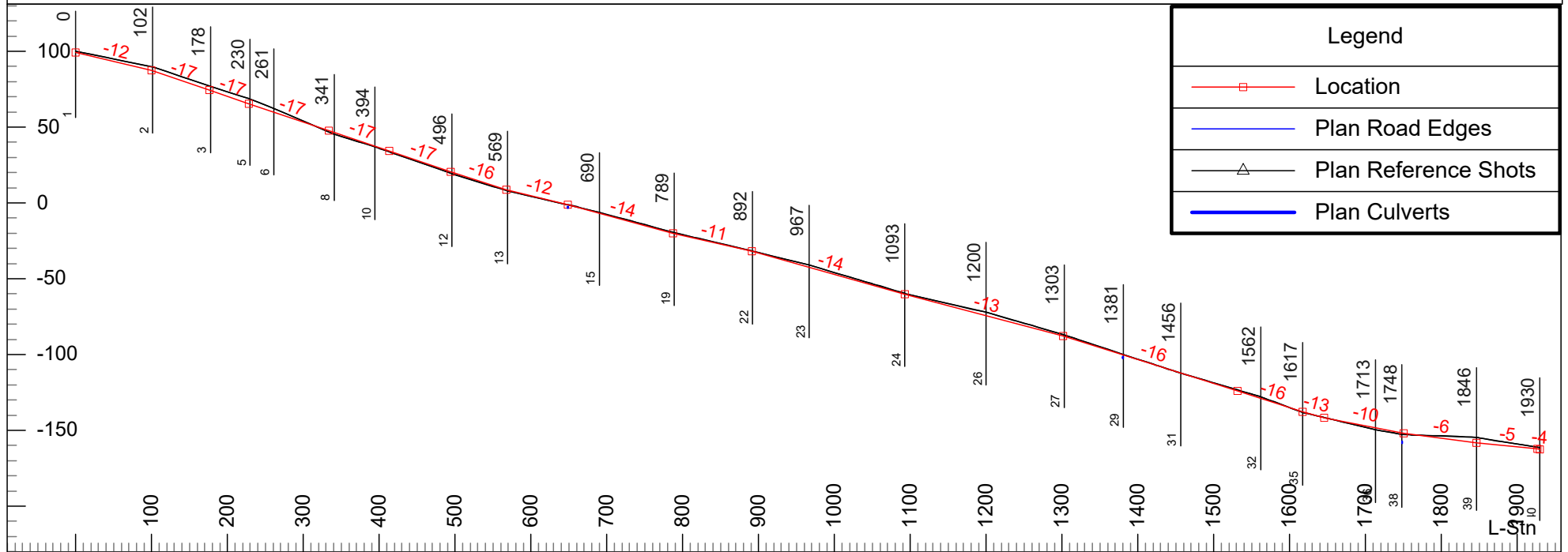
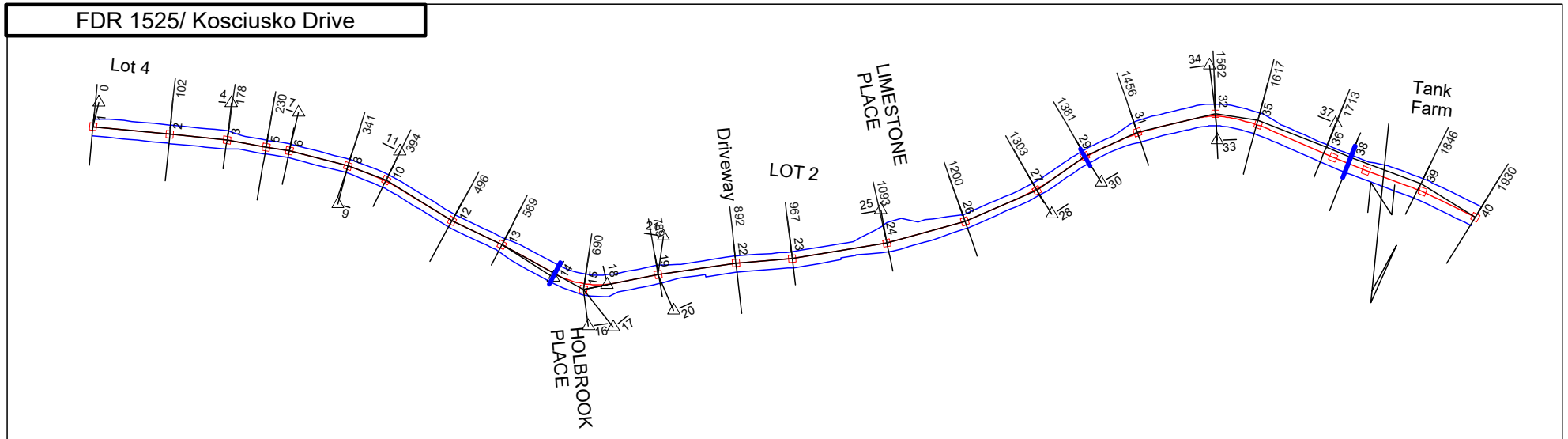
Existing Road

Potential Landing Area

PROPOSED ROTORCRAFT
LANDING ZONE
KOSCIUSKO ISLAND EAST
TIMBER SALE



FDR 1525/ Kosciusko Drive



Legend	
—□—	Location
—	Plan Road Edges
—△—	Plan Reference Shots
—	Plan Culverts

Station Range		Profile Vert Scale 1:1200 Profile Horz Scale 1:2400	USFS Design Level II DOF Site Specific	Notes: Draft Plan and Profile	Designed By: ADNR/ DOF (GS)	
0.0	1933	Plan Scale 1:2400			Sheet 1 of 12	24/02/26

Appendix E Kosciusko East Timber Sale Forest Land Use Plan SSE-1384-K

State of Alaska
Department of Natural Resources
Division of Forestry & Fire Protection



Coastal Region-Southeast Area Office
Forest Land Use Plan

Kosciusko East Timber Sale
SSE-1384-K

February 2024

Abbreviations

ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
BIF	Best interest finding
DMLW	Division of Mining, Land and Water
DOF	Division of Forestry & 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
POG	Productive old growth
POW	Prince of Wales
POWIAP	Prince of Wales Island Area Plan
ROW	Right-of-way
SESF	Southeast State Forest
SESFMP	Southeast State Forest Management Plan
UA	University of Alaska
USFS	United States Forest Service

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I. Introduction

Project File Number: SSE-1384-K

Division of Forestry & Fire Protection Office: Southeast

Area Forester: Greg Staunton

Forest Practices Geographic Region (AS 41.17.950): Region I

This Forest Land Use Plan (FLUP) covers proposed forest operations on approximately 186 acres of land on Kosciusko Island, approximately 1/2 mile to the east of the community of Edna Bay. It is intended to provide the best available information regarding the proposed harvest of timber, and management of other non-timber uses in compliance with AS 38.05.112 and AS 41.17.060, and must be adopted by the DNR before the proposed activity can occur.

☐ This Forest Land Use Plan is for timber sale(s) which have been determined to be in the best interest of the state pursuant to AS 38.05.035 (e) and AS 38.05.945. This FLUP does not determine whether or not to access and sell timber within the timber sale area, nor the method of sale. Those decisions have been made previously in the Best Interest Finding and are not appealable under this FLUP.

☒ This Forest Land Use Plan is for timber sale(s) for which a Preliminary Best Interest Finding was concurrently reviewed. A final best interest finding shall be completed prior to adoption of a FLUP pursuant to AS 38.05.035 (e) and AS 38.05.945;

☐ This Forest Land Use Plan is for timber to be harvested that does not require a final finding pursuant to AS 38.05.035 (e) and notification under AS 38.05.945.

A draft of this plan was distributed to the Alaska Department of Fish & Game (ADF&G) and the Department of Environmental Conservation (DEC) for their review and comments relevant to the consistency of this proposed project with the statutes governing forest land use plans (AS 38.05.112) and the requirements of the Alaska Forest Resources & Practices Act (AS 41.17) and its Regulations (11 AAC 95).

This Forest Land Use Plan was made available for public comments with the Preliminary Best Interest Finding; the review period ended on January 25, 2024. After public and agency review of the draft FLUP, the DNR reviewed comments (Best Interest Finding Appendix D) and made no substantive changes to the Forest Land Use Plan operational content.

This Forest Land Use Plan is procedurally adopted by the Department of Natural Resources with the BIF decision. Site specific compliance with the Alaska Forest Resources and Practices Act and the Regulations, as well as the Final Finding for this proposed project are reflected in this Forest Land Use Plan and will be implemented in the Timber Sale Contract.

An eligible person affected by this decision, and who provided timely written comment or public to the department, may request reconsideration of the decision to the DNR Commissioner per AS 44.37.011 and 11 AAC 02.

☐ Other Documents are referenced in this FLUP. This timber sale is designed to be consistent with the management intent of the following documents:

- Alaska Forest Resources & Practices Act
- Southeast State Forest Management Plan
- Prince of Wales Island Area Plan
- Kosciusko Island East Timber Sale Best Interest Finding SSE-1384-K

The administrative record for this sale is maintained at the Division of Forestry & Fire Protection Southeast Area Office filed as SSE-1384-K.

A. Legal description

Sections 23, 24, and 26, Township 68 South, Range 76 East, Copper River Meridian (CRM). The sale area is found within the Craig D-5 NW USGS quadrangle. See also map in Appendix A.

B. Operational Period

Calendar years 2024-2025

C. Timber Disposal

- ☒ Timber will be sold and will have a contract administrated by the State.
- ☐ Timber will be available to the public; permits obtained by the public will be issued by the State.
- ☐ Other

D. Objectives and Summary

1. To follow the Alaska Department of Natural Resources' (ADNR) constitutional mandate to encourage the development of the State's renewable resources, making them available for maximum use consistent with the public interest;
2. To help the State's economy by providing royalties to the State in the form of stumpage receipts, an infusion to the State's economy through wages, purchases, jobs, and business.
3. To help the local economy of the communities within southern Southeast Alaska by creating additional jobs due to the combination of road building, logging, trucking and potentially milling.

II. Affected Land Owners/Jurisdictions

A. State

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

B. Other Land Interests

Land Interest, Representative: USFS Road Reservations, USFS District Ranger and Engineering Staff

Land Interest, Representative: Public Use Easements, Maintenance delegated to the City of Edna Bay, Mayor of Edna Bay.

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

Forest operations will be designed to:

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

Harvest and Silvicultural Methods:

- ☒ The silvicultural actions are described in this document, and no prescription was written or is necessary.
- ☐ A silvicultural prescription has been written and is attached to this document in Appendix B.

A. Timber Stand Description and History

Timber types are primarily a mix of old-growth western hemlock (*Tsuga heterophylla*), Sitka spruce (*Picea sitchensis*), western red cedar (*Thuja plicata*), and Alaska yellow cedar (*Chamaecyparis nootkatensis*). Young-growth stands of Sitka spruce and western hemlock are found along the unitline and adjacent to the proposed sale. These adjacent stands were previously harvested during the period of WWII.

B. Timber Harvest Activities

Timber Harvest Activities are displayed in Table 1.

Table 1. Timber Harvest Activities

Unit-Setting ID	Acres	Topography	Silvicultural Action	Logging Method
1-1	20	Irregular Complex Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging
2-1	26	Irregular Complex Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging
2-2	29	Irregular Complex Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging
2-3	33	Irregular Complex Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging
3-1	31	Irregular Complex Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging
4-1	26	Irregular Complex Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging
4-2	16	Irregular Complex Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging
5-1	5	Irregular Complex Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging

C. Site Preparation

- ☒ Site preparation will not be necessary. There will be sufficient soil disturbance by logging to forego the need for additional ground scarification.
- ☐ Site preparation will be implemented and described in Table 2:

Table 2. Site Preparation

Unit ID	Acres	Site Preparation Method	Date of Completion
		Not Applicable	

D. Slash Abatement

- ☐ Potential for insect infestations caused by slash accumulations exists. Slash abatement for controlling infestations will be implemented as required by 11 AAC 95.370.
- ☒ Scatter slash; accumulations will be kept to less than 2 feet in height. The operator will use slash for puncheon in shovel logging trails to protect soil from displacement, erosion and compaction.
- ☒ Slash will be disposed of by the operator ☐ Slash will be disposed of by the State
- ☐ Other - method of slash disposal: ☐ removal off site ☐ crushing or grinding ☐ burning
- ☐ Burn permits necessary from DOF and DEC to be acquired.
- ☐ The operator will contact the DOF local area office prior to ignition of debris.

E. Soil Stability / Erosion / Mass Wasting

- ☐ Maximum percent side slopes are $\leq 50\%$
- ☒ Maximum percent side slopes are $> 50\%$

Percentage of sale area with slopes $> 50\%$: 12%

Maximum percent slopes: 80%

Steeper slopes all located on short, isolated pitches less than 100 feet length on karst bed rock formations.

- ☒ There are no indicators of unstable areas.
- ☐ Indicators of unstable areas were identified and will be mitigated by actions indicated below.

F. Timber Harvest—Surface Water Protection

- ☐ There are no streams or lakes abutting or within a harvest unit.
- ☒ Known surface waters and protection measures are described in Table 3 below. *Locations are included in the operational map in the Appendices.*

Table 3. Protection for Known Surface Waters

Unit	Waterbody Name	AS 41.17.950 Classification	ADF&G AWC #	Required Riparian Protection	Site-specific actions to minimize impacts on riparian area
1	Hamlin/Buggy Creek	Cataloged Anadromous	103-90-10610	100 FT	Retain timber per AS 41.17.118(a)1(A) and (B)

Forest Land Use Plan for Kosciusko East Timber Sale, SSE-1384-K

Unit	Waterbody Name	AS 41.17.950 Classification	ADF&G AWC #	Required Riparian Protection	Site-specific actions to minimize impacts on riparian area
1	None	Tributary to Anadromous <12%	(none) Tributary to 103-90-10610	Follow Best Management Practices (BMPS)	Split yarding, directional felling, removal of logging debris from waters, site specific crossing approval of DOF.
1,2,3	None	Surface Water	None	Follow Best Management Practices (BMPS)	Split yarding, directional felling, removal of logging debris from waters

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

- ☒ During the timber sale planning process
- ☒ During the agency review conducted for the Best Interest Finding for this sale
- ☒ During the drafting of this Forest Land Use Plan
- ☐ Stream Crossings (Title 16) Permits are needed per ADF&G Division of Habitat

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

- ☒ During the timber sale planning process
- ☒ During the agency review conducted for the Best Interest Finding for this sale
- ☒ During the drafting of this Forest Land Use Plan

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

Notes: See above.

G. Wildlife Habitat

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

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

- ☒ Timber retention - concentrations of timber surrounding harvest units, or interspersed within harvest units to provide cover.
- ☒ Snag Retention- snags or isolated trees left for cavity nesting species.
- ☐ Large Woody Debris – concentrations of downed timber or logging debris interspersed within harvest units to provide cover left on site.

☐ Other actions

Notes: Snag Retention will be applied only when practical to prevent unnecessary hazard trees around operations.

H. Cultural and Historical Resource Protection

- ☒ This project was reviewed by the State Historic and Preservation Office (SHPO).
- ☒ No artifacts have been reported within the project area(s).
- ☐ Known or likely sites have been identified and a mitigation plan is in place. (Describe the mitigation actions.)

I. Other Resources Affected by Timber Harvest and Management

- ☒ There are other resources and areas of concern besides surface water, fish habitat, and wildlife habitat that may be affected. Mitigations actions were addressed in the Best Interest Finding.

Table 4. Other Affected Resources / Areas of Concern

Impacted Resource	Reviewing Agency	Impact/ Mitigation Actions
Viewshed	DOF	None

- ☐ There are no affected resources or areas of concern other than surface water, fish habitat, and wildlife habitat, which are addressed in this Forest Land Use Plan.

J. Reforestation

Harvest type as it relates to reforestation requirement:

- ☒ Clearcut

Notes: Even-aged management

- ☐ Region I: Partial Harvest leaving more than 50% live basal area (11 AAC 95.375(b)(3))
- ☐ Region II or III: Partial Harvest relying on residual trees to result in a stocking level that meets standards of 11 AAC 95.375(b)(4).

Season of harvest:

- ☐ Winter harvest only
- ☐ Non-winter harvest only
- ☒ All-season harvest

Regeneration type:

☒ Natural regeneration

List species: Sitka spruce (*Picea sitchensis*), western red cedar (*Thuja plicata*), western hemlock (*Tsuga heterophylla*), and Alaska yellow cedar (*Chamaecyparis nootkatensis*).

☐ Coppice

☐ Artificial regeneration

☐ Seeding: Species and source of seed (general vicinity location of seed source)

☐ Planting: Species: _____ Date of proposed planting: _____

Source of seedlings (location of seed source): _____

IV. Roads and Crossing Structures

A. Road Design, Construction, and Maintenance

Roads will be designed, constructed, and maintained to prevent significant adverse impacts on water quality and fish habitat (AS 41.17.060(b)(5)), and site productivity (AS 41.17.060(c)(5)). Roads will comply with the best management practices in the Forest Resources and Practices Regulations (11 AAC 95.285 – 95.335). All roads used in this timber sale will conform at a minimum to the Division of Forestry Road Standards, site specific design may supersede this standard and will typically specified and applied through the timber sale contract.

Roads or other means required for the access and removal of this timber from the harvest area(s) or unit(s) are listed in Table 5A and 5B.

Table 5A. Road Reconstruction and Use

Road ID	Segment	Harvest Unit	Mile/ Station **	Road Class	Constructed and Maintained By	Construction Objective
1525000	A	All	0.11	Existing	Purchaser	Reestablish maintainable surface, drainage and clearing limits
1525000	B	All	0.38	Site Specific DOF Design.	Purchaser	Widen road surface and lower grade to the extent feasible, establish a maintainable surface, drainage and clearing limits

Road ID	Segment	Harvest Unit	Mile/ Station **	Road Class	Constructed and Maintained By	Construction Objective
1525000	C	All	0.61	Site Specific DOF Design.	Purchaser	Reestablish maintainable surface, drainage, and clearing limits

Table 5B. New Road Construction and Use

Road ID	Segment	Harvest Unit	Mile/ Station **	Road Class	Maximum Grade %	Constructed By	Maintained By
1525000-100	10,20,30, 40,50	1-1, 2-1, 2-2, 2-3, 3-1	1.31	Primary	12	Purchaser	Purchaser
1525000-110	10	1-1	0.11	Secondary	12	Purchaser	Purchaser
1525000-120	10	2-3, 4-2	0.15	Secondary	12	Purchaser	Purchaser

Road Class is as defined in the DOF Road Standards.

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

*** One station equals 100 feet. One mile equals 5,280 feet.*

Notes:

B. Road Erosion / Mass Wasting

Maximum percent side slopes of roads: 40%

☒ Maximum percent side slopes are $\leq 50\%$

☐ Maximum percent side slopes are $> 50\%$

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

☐ Indicators of unstable areas were identified and will be mitigated by actions indicated below:

Table 6. Road Erosion Control Risk and Mitigation

Road ID	Segment	Mile/ Station or Point Label	Identified Erosion Risk	Risk Level	Mitigation
All	--	--	None	Low	Closure end of harvest (waterbars, cross drains)

C. Crossing Structures

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

- Replace existing drainage structure (18" CMP) at the west end of 15250000-Segment B. with an 18"CPP.

☐ No crossing structures are needed within the project area.

☐ Crossing structures will be placed in access roads as described in the table below:

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

Road ID	Segment	Mile/ Station or Point Label	Bridge Length (ft.) or Culvert Diameter (in.)	Structure Type	AS 41.17.950 Stream Classification	ADF&G AWC Number	Duration of crossing structure in place
1525000-100	40	T517	18 IN	Corrugated Plastic Pipe (CPP)	Surface Water	None	End of sale
1525000-100	40	T518	36 IN	Log Culvert (LC)	Surface Water	None	End of sale

D. Road Closure

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

Table 8. Road Closures

Road ID	Segment	Unit	Closure Type All Season/Winter	Estimated Closure Date	Projected Road Use after Timber Harvest
1525000	A,B,C	NA	None	None	Public Access
1525000-100	10, 20, 30, 40, 50, 60	1-1, 2-1, 2-2, 2-3, 3-1	All	To Be Determined.	Firewood Harvest, Silviculture
1525000-110	10	1-1	All	End of Harvest	Silviculture
1525000-120	10	2-3, 4-2	All	End of Harvest	Silviculture

E. Material Extraction

- ☐ There will be no material extraction sites in the project area.
- ☒ Material extraction and associated overburden disposal will be located outside of riparian areas and muskegs. Material extraction and disposal will be in a manner that prevents runoff from entering surface waters. All material sites will require the submittal of site plans and prior approval of the DOF.
- ☐ Other:

F. Other Resources Affected by Roads or Material Extraction

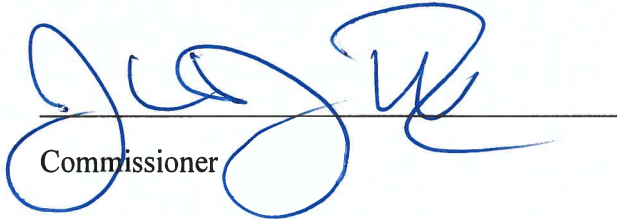
List resources other than water, habitat or cultural resources potentially impacted by road construction, and indicate how impacts will be mitigated. Other affected resources could be, but are not limited to mining claims, scenic areas, recreational trails, etc.

Table 9. Other Affected Resources

Impacted Resource	Reviewing Agency	Impact / Mitigation Actions
1525000 Road Public Safety	USFS/DOF	<ul style="list-style-type: none">• Provide adequate sight distance and space for passing or two-way vehicle traffic.• Sign traffic area and communicate plans to users.• Control purchaser vehicle speeds in contract based on conditions.

V. Approvals

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



Commissioner

2/29/2024

Date

V. Approvals

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

Commissioner

Date

VI. Reconsideration

An eligible person affected by this decision of the department, and who provided timely written comment 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 reconsideration is filed by that date, this decision goes into effect as a final order and decision 30 days from signature.

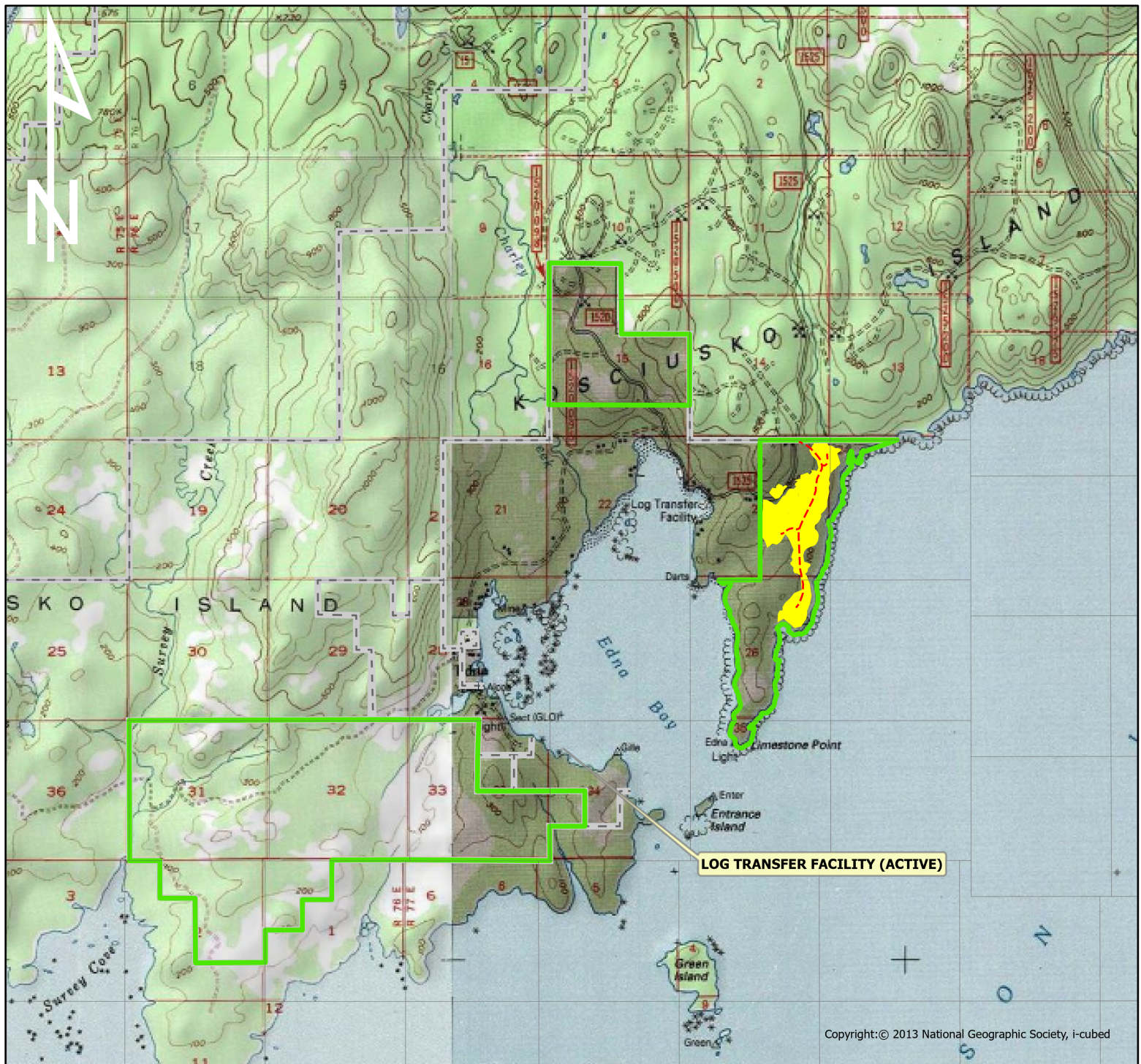
A copy of 11 AAC 02 is enclosed as part of the Best Interest Finding (Appendix C) and is also available on the department's website at <https://dnr.alaska.gov/mlw/pdf/DNR-11-AAC-02.pdf>.

If you have any questions, please contact Greg Staunton of the Southeast Area Office at (907) 225-3070 or e-mail dnr.dof.sse@alaska.gov

Appendix A: Timber Sale Maps

Appendix A1 Vicinity Map (1 page)

Appendix A2 Unit Maps (3 pages)



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0 1 2 Miles
Area Map 1 in = 1 MILE

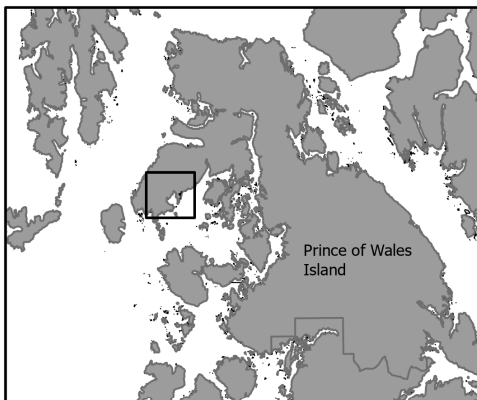
T68S R76E, Section(s) 23, 24, 26
Copper River Meridian

APPENDIX A1 **SSE-1384-K** **KOSCIUSKO EAST** **TIMBER SALE** **AREA MAP**

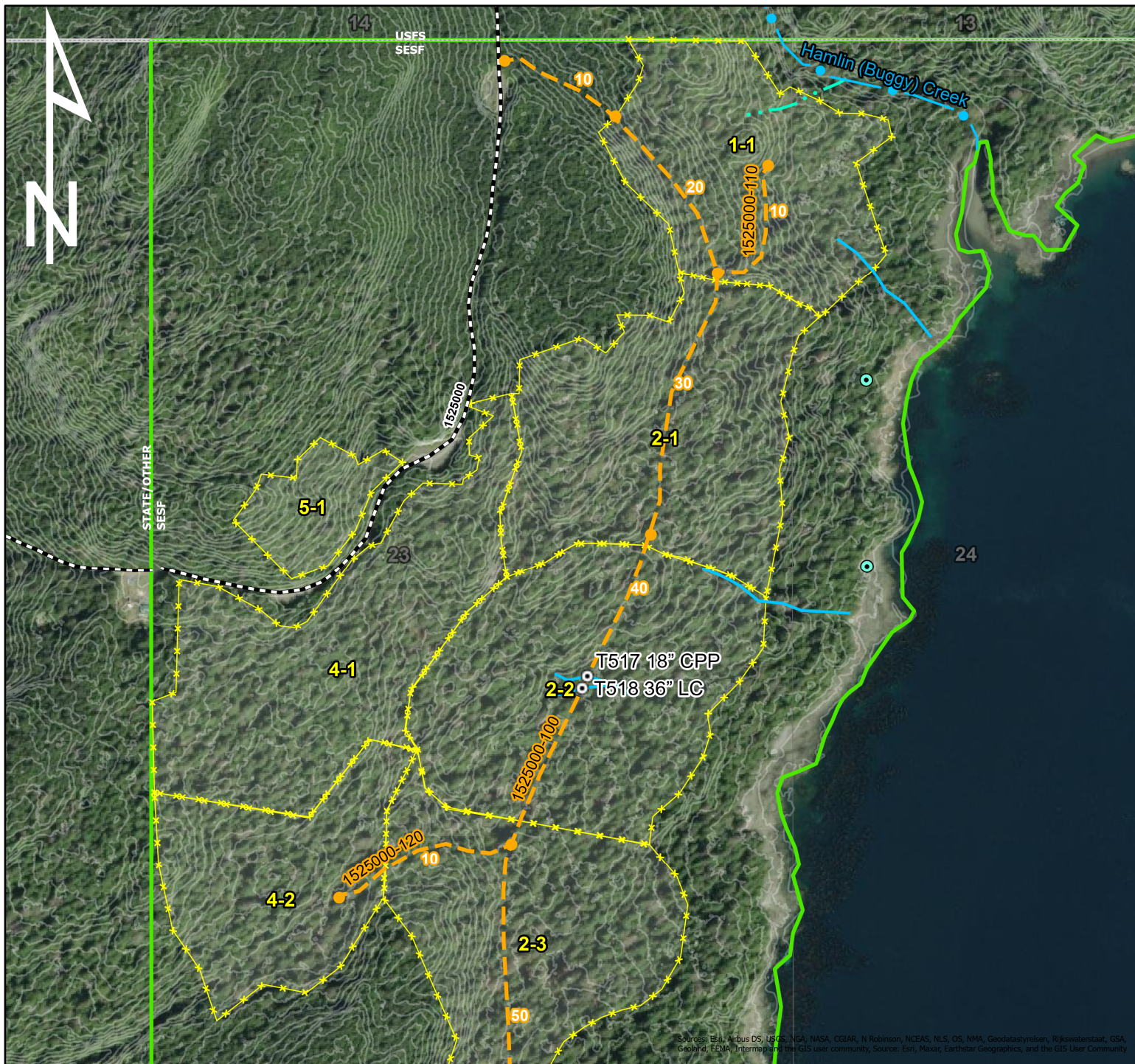


Legend

- Proposed Harvest Unit
- Southeast State Forest (SESF)
- Property Line
- Proposed Road



Vicinity Map 1 in = 32 miles



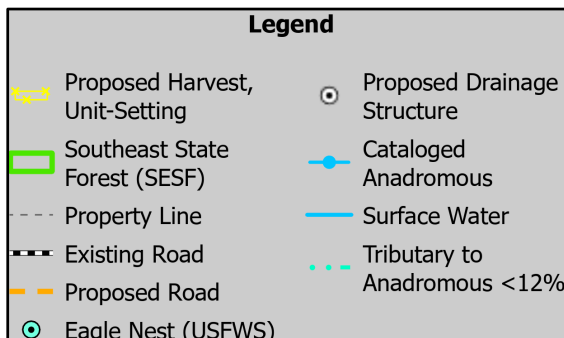
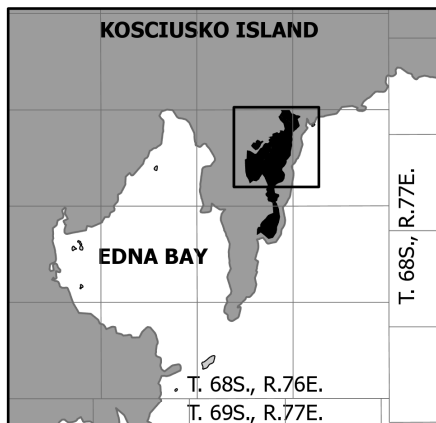
Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatasysteisen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

0 250 500 1,000 1,500
Feet

Sale Map 1 in = 500 FT

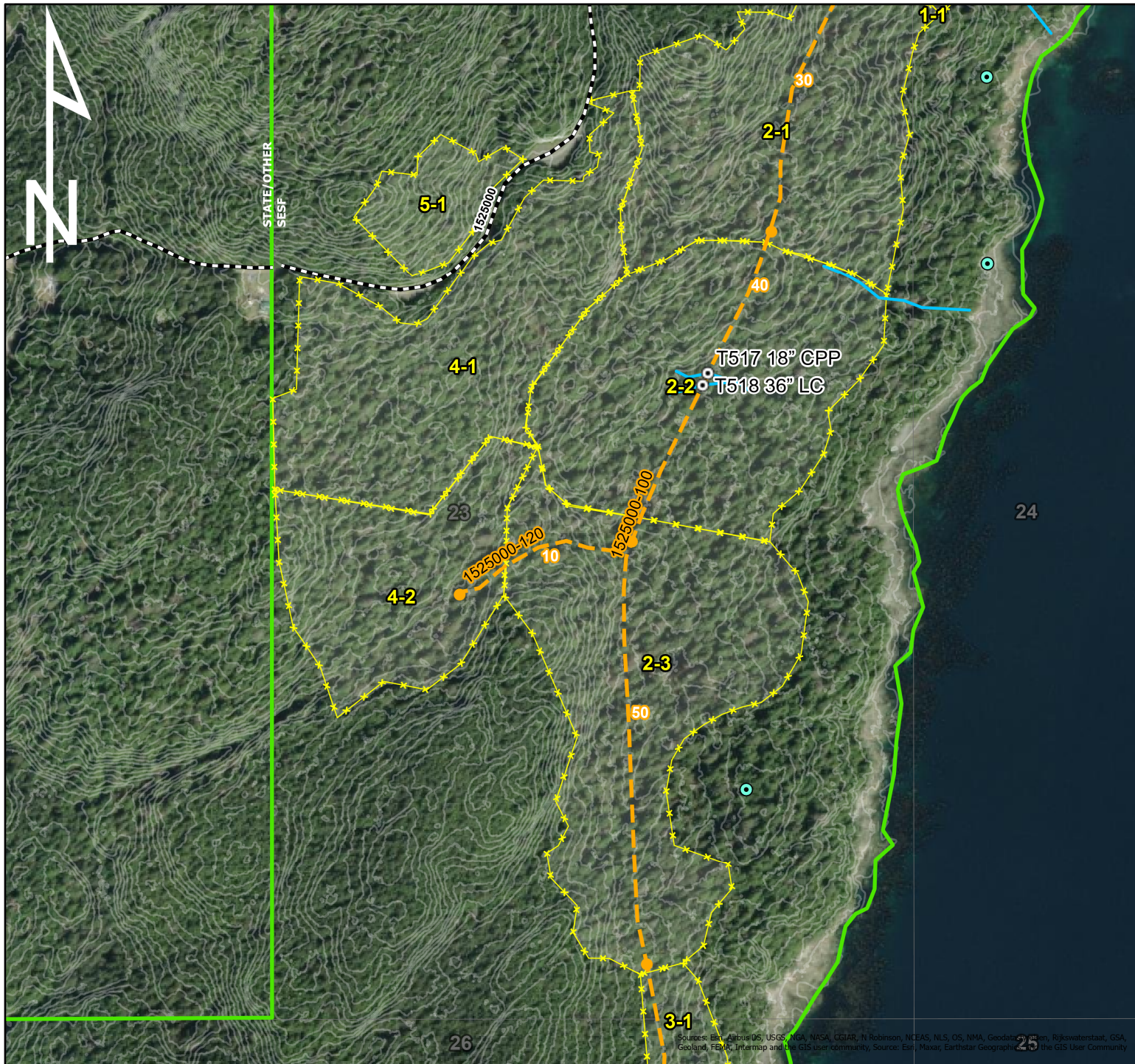
T68S R76E, Section(s) 23,24,26
Copper River Meridian

Contour Interval = 10 FT
Source: USFS LiDAR 2018



APPENDIX A2 SSE-1384-K KOSCIUSKO EAST TIMBER SALE MAP 1



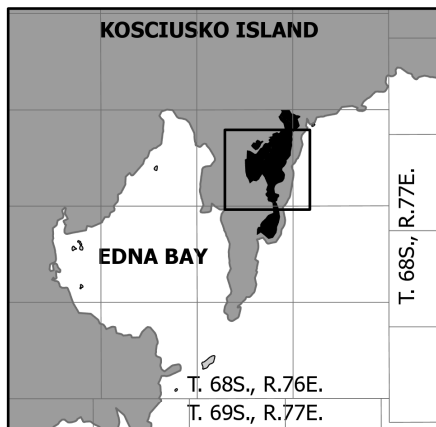


0 250 500 1,000 1,500
Feet

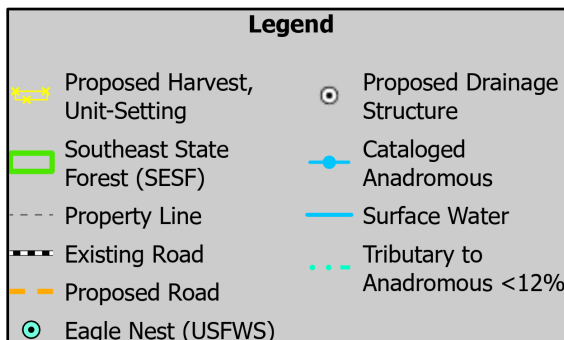
Sale Map 1 in = 500 FT

T68S R76E, Section(s) 23,24,26
Copper River Meridian

Contour Interval = 10 FT
Source: USFS LiDAR 2018



Vicinity Map 1 in = 2 miles



APPENDIX A2 SSE-1384-K KOSCIUSKO EAST TIMBER SALE MAP 2





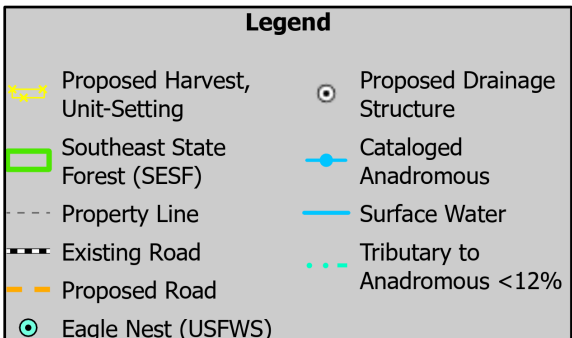
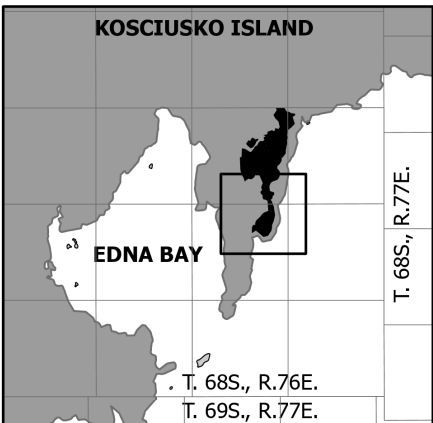
Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatasysteisen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community, Sources: Esri, Maxar, Earthstar Geographics, and the GIS User Community

0 250 500 1,000 1,500 Feet

T68S R76E, Section(s) 23,24,26
Copper River Meridian

Contour Interval = 10 FT
Source: USFS LiDAR 2018

Sale Map 1 in = 500 FT



APPENDIX A2
SSE-1384-K
KOSCIUSKO EAST
TIMBER SALE
MAP 3



Appendix B: Supporting Information

Note: Silvicultural and stand information has also been described in the BIF.

Alaska Forest Practices and Regulations.

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

Forest Road Standards.

[http://forestry.alaska.gov/Assets/pdfs/resources/forest road standard design 20151231.pdf](http://forestry.alaska.gov/Assets/pdfs/resources/forest_road_standard_design_20151231.pdf)