

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



SOUTHEAST AREA

**BEST INTEREST FINDING AND
DECISION FOR
EL CAPITAN TIMBER SALE
SSE-1380-K**

March 2023

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

Contents

I. PROPOSED ACTION	4
II. STATUTORY AND REGULATORY AUTHORITY	4
III. ADMINISTRATIVE RECORD	5
IV. SCOPE OF DECISION	5
V. PROJECT LOCATION, LAND STATUS, AND DESCRIPTION	6
VI. PUBLIC NOTICE	27
VII. PUBLIC COMMENT	27
VIII. DISCUSSION, FINAL FINDING and DECISION	28
IX. SIGNATURE	28
X. RECONSIDERATION	29
XI. APPENDICES	30
Appendix A SSE-1380-K El Capitan Timber Sale Area Maps	31
Appendix B References	32
Appendix C Appeal and Request for Reconsideration Regulations	34
Appendix D SSE-1380-K El Capitan Timber Sale Comments & Responses	39

I. PROPOSED ACTION

DOF is proposing to offer for sale approximately 340 acres of mature old growth timber composed of primarily western red cedar and western hemlock with components of Sitka spruce, and Alaska yellow cedar from state lands on Prince of Wales (POW) Island. The volume to be offered totals approximately 8,000 thousand board feet (MBF). DOF proposes to sell the commercial timber in one or more negotiated sales under provisions of AS 38.05.115 or AS 38.05.118. The sale will be noticed as required by sale type authority and AS 38.05.945 prior to being sold. The land covered by this PBIF appeared in the 2018-2022 and 2021-2025 Five-Year Schedules of Timber Sales (FYSTS).

The DOF publicly notified this action on August 26, 2022. Comment was collated and responded to in the Appendix D of this document. Based on review of the project file information, the DOF modified the following from the Preliminary Best Interest Finding:

- Description of the USFS facilities in the area.
- The description of the timber cover types was aligned with the DOF Southern Southeast Inventory vegetative descriptors of timber.
- Soils were described to reflect the observations relative to karst features.
- The association of resource values between the 2000 Road and anadromous stream 105-42-10110 was explicitly made in the wildlife section as a design decision made by DOF. While wildlife is recognized in the area, it was not the only resource value concern considered. Merchantable timber was left in this area in the preliminary and the final decision adjacent to the 2000 Road.

The management objectives for the proposed timber sales are:

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

II. STATUTORY AND REGULATORY AUTHORITY

The Division is taking this action under the authority of

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

III. ADMINISTRATIVE RECORD

The Division will maintain an administrative record regarding the decision of whether or not to proceed with the action as proposed. This record will be maintained at the DOF's Southern Southeast Area Office filed as SSE-1380-K.

IV. SCOPE OF DECISION

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

Step 1: Regional planning. The Department of Natural Resources (DNR) develops area plans and state forest management plans to designate appropriate uses for state land, classify the land accordingly, and establish management guidelines for multiple use. These plans determine where timber sales are an allowed use, and what other uses must be considered when designing and implementing sales. Subsequent land use decisions must be consistent with the area plans. The area in this BIF is covered by the Southeast State Forest Management Plan (SESFMP) and the Prince of Wales Island Area Plan (POWIAP), and the BIF is consistent with these plans. The finding also considers the Interagency Wildfire Management Plan. The proposed area is not within a municipality, and therefore no municipal plans apply.

Step 2: Five-year Schedule of Timber Sales (AS 38.05.113). The Southeast Area Office prepares a Five-year Schedule of Timber Sales every other year. The Schedule identifies proposed sales, including their location, volume, and main access routes. The Five-year Schedules are scoping documents that provide an opportunity for public, agency, and industry to identify potential issues and areas of interest for further consideration in the best interest finding and Forest Land Use Plan. A proposed timber sale must appear in at least one of the two Five-year Schedules preceding the sale. The land covered by this BIF appeared in the 2018-2022 and 2021-2025 FYSTS.

Step 3: Best Interest Finding. A best interest finding is the decision document that:

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

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

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

Step 4: Forest Land Use Plans (AS 38.05.112). Prior to authorizing harvest of timber on any area greater than 10 acres, the DOF must adopt a site-specific Forest Land Use Plan (FLUP) for the harvest area. DOF will prepare FLUP(s) for harvest areas within the overall sale area covered by this best interest finding. FLUPs specify the site, size, timing, and harvest methods for harvest units within the sale area. FLUPs also address site-specific requirements for access construction and maintenance, reforestation, and multiple use management. Draft FLUPs will be based on additional field work, agency and community consultation, and site-specific analyses by the DOF, and will be subject to public and agency review.

Step 5: Timber sales and contracts. Following adoption of the final BIF, and completion of the FLUPs, DOF will offer the timber for sale by auctioning competitive sales and/or negotiating some sales with purchasers. The Division will sign a contract with the winning bidder for each sale. The contract will include stipulations to ensure compliance with the best interest finding, FLUP, and statutory requirements.

Step 6: Sale administration. DOF administers timber sales and conduct field inspections to ensure compliance with the final BIF, FLUP, timber sale contract, and applicable laws, including the Alaska Forest Resources and Practices Act 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 1, 12, and 13, Township 66 South, Range 78 East, and Sections 6, 7, 8 and 18, Township 66 South, Range 79 East, Copper River Meridian (CRM). The sale area is found within the Petersburg A-4 NW USGS quadrangle. See attached map titled: Appendix A, SSE-1380- K El Capitan Timber Sale Harvest Area Map.

B. Title status

The sale area lands were granted to the State through National Forest Community Grant 341 and 385.

C. Land use planning, classification, and management intent

This area is not within a municipality / No municipal plans apply to this area. The Inter-agency Fire Management Plan includes these lands in the Modified protection category.

Other than the portions of the proposed harvest areas within the State Forest, and the portions of the proposed harvest areas within the west half of Section 12, the proposed harvest areas are closed to leasehold location with respect to mining (see Mineral Order 1118).

The preponderance of the proposed harvest is on state land within the geographic region covered by the POWIAP (El Capitan Subunit 4a) that is adjacent to the Southeast State Forest (SESF) represented in the El Capitan North Unit of the Southeast State Forest Management Plan. The DOF is the land manager for the SESF; the DMLW is the land manager for all other State lands in this timber sale. The DOF is the forest resource manager for all State land contained in the timber sale. The specific management intent for the variety of anticipated uses in the areas follow as they have relevance to this activity (excerpted from the plans as potentially applicable):

SOUTHEAST STATE FOREST PLAN

The primary purpose for the legislatively designated Southeast State Forest is timber management (AS 41.17.200); provisions of area plans do not apply within legislatively designated areas such as state forests. The SESFMP was adopted on February 29, 2016.

“AS 41.17.200. State forest purposes and management. (a) The purpose of AS 41.17.200 - 41.17.230 is to permit the establishment of designated state-owned or acquired land and water areas as state forests. The primary purpose in the establishment of state forests is timber management that provides for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources. (b) In managing a state forest, the commissioner shall, consistent with the primary purpose of a state forest under (a) of this section, restrict the public use of the land and its resources, including timber, fish and wildlife, and minerals, only when necessary to carry out the purposes of this chapter.”

El Capitan North and South Units, Chapter 3, Specific Management Direction.
Fisheries: #195-42-10100 (Wolf Creek), #103-90-10010, #101-90-10020.
Scenery: Consider scenic byway.

PRINCE OF WALES AREA MANAGEMENT PLAN (El Capitan UNIT 4a)

Chapter 2 of the plan contains area wide plan policies by use type. These policies and guidelines describe policies and guidelines for the varying use types that will be integrated as resource use and development occurs. Chapter 3 outlines the management policies for the specific land management units and are listed below.

Chapter 3. MANAGEMENT INTENT

State tidelands and submerged lands are managed for multiple use. Some areas are designated for resource development support facilities, such as log transfer and storage areas and mining access sites.

Management for the subunit emphasizes the important recreation and aesthetic values and the use of commercial forest resources of El Capitan Passage. Negative impacts on the recreation and aesthetic values of El Capitan Passage should be mitigated when siting and designing development activities.

Tidelands and submerged lands are also managed to protect the most important fish and wildlife habitat and harvest areas.

State lands will emphasize the importance of this area as the most northerly major road junction on Prince of Wales Island. Primary management considerations for the subunit are to retain options for siting future public, private, and commercial recreation developments, and saltwater access facilities. Low density residential uses may also be developed. However, most community services, such as a school or post office, should be located in Whale Pass. Areas designated “Gu” (General Use) and “S” (Settlement) that are 400 feet or more from the coast are appropriate for timber harvest.

Three anadromous fish stream mouths will be closed to mineral entry. Two streams drain into the western arm of El [sic] Passage and one stream flows into Devilfish Bay. All other state lands in this subunit will remain open to mineral entry.

Fish and Wildlife (Applicable Excerpts)

Trapping and deer hunting occur throughout the subunit but are not designated because they do not meet the criteria for intensive community harvest.

Management Intent:

Lands designated for fish and wildlife habitat and harvest will be managed to avoid significant impacts to habitats and traditional harvest activities. Impacts on non-designated community harvest areas should be considered when authorizing activities.

Forestry

There are significant stands of commercial grade timber in portions of the subunit. Some of the areas within the subunit, especially adjacent to Twin Island Lake have experienced timber harvest. Extensive areas of timber harvest also occurred to the north and south of Twin Lake within the Tongass National Forest.

Management Intent:

State uplands, tidelands and submerged lands designated “F” (Forestry) will be managed to support timber harvest activities consistent with other co-primary designations. Timber harvest is considered to be an appropriate use in areas designated “Gu” (General Use) and those areas designated for settlement (“S”) consistent with the requirements of Chapter 2. Future timber harvest operations should, in the preparation of the Forest Land Use Plan, provide a buffer separation from Twin Island Lake to protect viewsheds,

between harvest and proposed disposal areas, and at anadromous streams and other significant habitat areas. The access and road requirements of potential settlement and commercial areas should be considered in the design of timber harvest roads.

Recreation (Applicable Excerpts)

Management Intent:

State lands in El Capitan Passage will be managed for public recreation and private recreational services appropriate to the road junction location and for potential water access on the west side of the island. Other appropriate uses can take place, including settlement and timber harvest under appropriate site and design considerations.

Settlement (Applicable Excerpts)

Management Intent:

Timber harvest in the areas designated “S” (Settlement) is appropriate, although the design of timber harvest areas and their roads should consider buffer separations from potential subdivisions and other design measures intended to minimize impacts to residential uses.

D. Current access and land use:

The main overland (road) access to this sale area is through the Alaska Highway System. Most of the sale area is located off the 2000 Road west of Twin Lake on the Prince of Wales Island Road system. The remaining portion of the sale is located on the 2700 Road to the south. Lands used in planning the timber sale are a combination of legislatively classified State Forest land, General Use, Settlement/ Recreation and classified land. The bulk of the merchantable timber identified is located on the latter mixed land classification managed by DMLW.

Portions of the management area were logged approximately 30-50 years ago, and those harvested areas presently support well-stocked second growth timber stands of a variety of ages.

The USFS managed the project area prior to State conveyance and conducted timber harvest and other forest management activities in the area prior to State conveyance; the project area still contains numerous reserved forest roads managed by the USFS which were constructed and are maintained to that agency’s standards for commercial timber operations. The USFS is the responsible agency for the road management and maintenance of these drivable roads in the area. The USFS stated they grade these roads three times a year outside of timber sale activity. The road system in the area is only seasonally maintained.

The second-class City of Whale Pass is seven miles to the east on the other side of POW. Residents of that community and other communities on POW to some extent use the area for subsistence

activity. Sealaska Corporation is the regional native corporation; there is no native corporation land adjacent to the timber sale.

Dispersed recreational opportunities such as hunting, fishing, and camping are conducted seasonally in the area by residents and tourists alike. Several saltwater fishing lodges are located to the west in Sea Otter Sound and on the other side of the island based in Whale Pass.

A federal mineral claim is located to the west of State ownership focused on limestone. The activity on the mineral claim occasionally warrants private operators to plow the 2000 Road for access to the rest of POW in the winter.

The USFS has an established and permitted Log Transfer Facility (LTF) on a small island connected to POW by a road causeway approximately one mile west of sale area. The LTF has not received use in the last decade other than for moving heavy equipment by barge to the north end of POW. The El Capitan LTF also has a primitive boat launch that receives use by residents and fishing charter operators accessing the west coast of POW. The USFS has listed the ramp as a recreational improvement project in the POW Landscape Level Analyses. Several groups were observed camping at various times on the LTF uplands during the State timber sale planning fieldwork.

A quarter mile east of the LTF, there is an established trailhead to the El Capitan cave, a karst interpretive site and an old USFS administrative camp area that the public uses for staging remote activities. The cave and karst interpretive site, although promoted and staffed by the USFS in the past decade, has received limited use and has been subject to funding constraints. The USFS also has an administrative cabin and a dock adjacent to the site. The dock is used by the public for transient boat moorage. All of the USFS facilities when observed in 2022 were showing their age and generally in need of significant maintenance or replacement.

The El Capitan Passage receives occasional boat traffic from recreational and commercial vessels trafficking the outside of POW Island through the semi-protected passage. The passage is also a traditional transportation corridor for log rafts moving within the Tongass Archipelago.

The southeast quarter of Section 11 was subdivided by DMLW and was posted in the 2022 State Land Offing Brochure. Some of the lots within that subdivision are listed for disposal (purchase).

E. Background and description of proposal

1. Background:

The State seeks to use State Forest land on Prince of Wales Island to encourage sustainable development of the State's forest resources, making timber available for sale and harvest. The State is also making timber available as is feasible from other land classifications responding to its objective to develop settlement land for Alaskan use. The demand for State timber is significant due to the recent change in the federal timber

supply of old growth timber. Most of the State land base in Southeast Alaska is remote. While the El Capitan area is relatively remote it is proximate to the existing road system and offers forest resource values close to the remaining mill facilities and skilled local work force. A diversified economy is important to Southeast Alaska. By direction from the Governor and Legislature, the Division of Forestry manages a timber sale program that makes timber volume available to help sustain the region's timber industry and economy.

2. Timber volume and sustained yield:

The timber is located on a combination of Settlement/ Recreation, General Use and State Forest classified land. Based on staff observations, the total estimated saw log volume identified in the proposed 340-acre sale is 8,000 MBF. Of this, approximately 76 acres with an estimated 1,800 MBF is located on State Forest land or General Use classified land.

The Division of Forestry is required to manage its timber harvest on State Forest and General Use classified 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 output 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.

Timber harvest areas located on Settlement-classified land are not managed on a sustained yield basis because the State's primary focus for those lands is eventual disposal and divestiture from State ownership.

3. Harvest unit design:

The sale area harvest units are designed for clear-cut harvest using conventional shovel logging and high lead cable yarding methods. The clear-cut silvicultural action is common in Southeast Alaska. Due to the variability of the existing stands of timber and the constraining topography, the unit lines generally are irregular in edge appearance and provide elements of structure to the units as they reforest. Clear-cut harvest is used for a variety of reasons. Categorically it yields positive forest growing conditions in most of Southeast Alaska from the standpoint of timber recovery and rate of regeneration. Typically, clear-cuts also yield the most return on the investment for the road constructed

and the costs associated with the logging. In this case it also aids in the feasibility to provide access proximate to settlement suitable land. From a safety standpoint, clear-cuts are safer and thus more cost effective to manage during logging because of the reduction in hazards compared to partial cuts. While other prescriptions such as a partial cut may provide a level of retained forest values, the forest regeneration generally responds slower than in a clear-cut due to the diminished light available. Post-harvest wind-throw in these shallow rooted stands tends to be significant. This is precipitated by added turbulence created by openings and irregular stand height in partial cuts which tend to present a post-harvest risk to regeneration. This damaged timber is in turn difficult and often not feasible to utilize without damaging the regenerating timber around it. The specific configuration of the harvest proposed will be defined in more detail in the FLUP. Field reconnaissance indicates the area is harvestable using shovel logging techniques with several settings requiring high lead cable logging methods due to steeper slopes. The Division of Forestry will require full or partial suspension for any cable logging that occurs in the harvest units and ground-based mechanical yarding will be suspended in times of saturated soil conditions if degradation of surface waters and standing water is likely to result.

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

Natural regeneration is the preferred regeneration method for this sale, and it is anticipated that adequate stocking levels will be achieved within five years after harvest. Experience with this regeneration method on POW has shown that well-stocked stands are readily established within regulatory timeframes.

Sitka spruce is the preferred species in the projected market conditions. Spruce will likely be the favored and dominant species due to anticipated scarification in the units during harvesting operations. Scarification will disturb the vegetative mat and in turn provide a more receptive seed bed for spruce. Western hemlock and western red cedar will likely be major components of the regenerated stand as well, since they currently occupy the sites. Alaska yellow cedar represents less than ten percent (total species composition) in the project area. It is predicted that Alaska yellow cedar will regenerate on sites it currently occupies, but at lower stocking levels due to vigorous regrowth of competing species (western red cedar and hemlock) as typically occurs when the lower volume/lower productivity growing sites are harvested or otherwise disturbed at the stand level. The DOF will conduct post-harvest reforestation inspections of all areas of commercial timber harvest to ensure the stocking of natural regeneration meets or exceeds FRPA reforestation requirements.

5. Road access design and construction: Access design, construction, and maintenance will comply with the Forest Resources and Practices regulations (11 AAC 95.285-.355) and meet the DOF Road Standards for secondary and spur roads. Where roads are in

Settlement Classified land, the DOF has coordinated with the land development section on the appropriateness of the location of the road relative to the planning intent.

6. Existing Roads: The existing forest roads were constructed for timber access several decades ago associated with the USFS timber sale program. The projected mainline haul route uses roads managed by the USFS. The log truck haul route for the sale is projected to occur westerly towards the USFS El Capitan LTF on the west side of POW. While hauling to the Whale Pass LTF or points to the south is possible, it is not likely based on economics and the current configuration of timber operators on Prince of Wales Island. The timber purchaser will be required to obtain authorization of the land or road manager to use the roads and any log transfer facilities as part of the sale operating plan.

All the existing USFS roads identified, and which may be used in this timber sale are presently in an operable condition. The DOF will work with the USFS to resolve short and long-term maintenance needs that may be appropriate for the projected timber volume to be hauled on the system. Maintenance tasks such as reconditioning of the road surface, brushing, recovering useable turnout space, cleaning ditches and the drainage structures are typically needed prior to the use of a road that has not been commercially active within a decade's time. The operator will be required by the timber sale contract to maintain the different road systems proportionate to their use during this sale. Roads will receive regular and timely maintenance during operations to address road conditions such as potholes and excessive road dust precipitated from heavy truck traffic. Residual road conditions will be like or better than conditions that existed prior to the sale. Expectations and responsibilities will be formally established prior to the start of timber sale road construction and timber harvest operations.

The 2700 and 2000 Roads have been maintained for highway traffic and are in fair condition. The roads receive intermittent use by the public. The road system on this portion of the island has a very low volume of traffic. Spot observations of the two mainline roads indicate that vehicle traffic per day ranges between 2 and 20 vehicles with most of the activity occurring in the summer and fall. The roads handle light opposing traffic moving at lower speeds. Some sections on the 2700 have limited sight distance for drivers; young growth timber and other vegetation such as grass and shrubs along the ditch line and shoulder make for slow two-way traffic. The usability and safety of the pull outs and the shoulder of the road could benefit from clearing.

Log trucks on narrow roads can be a traffic hazard. The DOF will work with the USFS to mitigate the risk by reconditioning the pull outs, increasing signage, and clearing the routes of vegetation. Logging operations adjacent to the system roads will be on secondary road systems, located off the road surfaces and will seek separation where feasible for loading per USFS reservation and policies.

The 2000770 Road is not drivable due to vegetation. Harvest operations will recondition

the first several hundred feet of the road for access. The residual condition of this road segment will be coordinated with the USFS.

7. Proposed Roads: Within the State Forest, the roads will be used for long-term forest resource management, including future commercial timber harvest entries. The minimization of the road footprint supports the greatest allocation of ground area to silviculture, influences logging costs and is typically a factor in reoccurring operational costs. On Settlement classified land, the road has been placed to facilitate the near-term harvest of the timber, balancing this with long-term access objectives. The DOF intends to document and request reservation of right of ways from DMLW for access to the State Forest land through the other land classifications as part of this management action.

Sale development has documented all significant surface drainages crossed by the proposed roads. To maintain water quality during road construction, the Division of Forestry will implement the FRPA's Best Management Practices (BMP). Due to the relatively small drainage areas, the surface drainage structures are generally small. The location of the drainages and associated structures will be specified in the FLUP process. Most of the crossings are projected to use culverts.

Numerous tributary waters to anadromous streams 105-42-10110 and 106-30-10800-2050 are proposed to be crossed by spur roads. Only one crossing on a tributary of stream 105-42-10110 was proximate to observed fish habitat on the 200900 Road in Unit 6. Based on stream gradient, the proposed crossing of this stream is very close to the upper limit of observed rearing habitat. Topography constrains the crossing location. Maintaining existing flow conditions will govern the structure chosen. The other stream reaches crossed by the proposed roads elsewhere are above ADF&G documented fish barriers and do not exhibit characteristics or evidence of fish habitat.

Limestone karst topography was evident in most of the units. Road location has avoided and minimized visible karst features. Construction will mitigate activity that could lead to recruitment of fines and debris into underground features or feature collapse.

Soils in the area were observed to be thin, organic horizons with moderate to poor drainage. To keep the potential for soil erosion to a minimum, the amount of road construction has been minimized and the roads are generally not located on steep slopes. The roads are designed to follow the natural contours and benches as much as practical and are generally located on the more moderate slopes. Cable and shovel logging landings have been chosen to manage and minimize the concentration of water and movement of soil. To minimize the potential for erosion, FRPA road construction, maintenance, and slope stability standards are performance requirements of the state timber sale contracts. The DOF timber sale administrator will ensure, with frequent field inspections, compliance with the timber sale contract, including those provisions related to erosion and slope stability.

Most of the road is located to achieve a simple overlay style of construction typical of the area. The road system, with a few exceptions, is designed to be constructed with grades less than 12%. Some drilling and shooting will be required to remove rock obstructions and facilitate good drainage or to full-bench the road on short steeper sidehill sections of ground. Road grades of less than 12% are desirable over steeper grades because they lose less of their fine surface materials through traffic displacement and the runoff of rainwater.

The DOF will consider leaving some of the secondary roads open for temporary vehicle access so the public may access residual wood for purposes of firewood collection if it is made aware of the need. It is unlikely that the area would be utilized significantly for firewood because there is not a nearby community. Keeping a road open will be done where doing so will not compromise obligations to keep the road maintained for the preservation of soil and water quality and there is a significant firewood resource present. Spur roads constructed in this sale will generally be closed after harvest of timber to meet FRPA requirements and minimize dumping of garbage and other unauthorized activities. This road management component may be modified by the land manager in the future as local needs are expressed and then addressed or accommodated. Overall, the secondary roads constructed in the sale are projected to be closed once reforestation has been assured and residual cordwood value has been recovered in the harvest units because funds are typically not available to maintain the roads for long-term general access by the public. Site specific maintenance and closure costs relative to future state budget constraints may require a more aggressive road storage or closure plan.

8. Appraisal method: DOF will appraise the timber value in compliance with 11 AAC 71.092. The sale area will be appraised by using a residual value appraisal method. Selling values and extraction cost 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:

The proposed harvest area is primarily composed of commercial forest in the Stratum 2 and 3 types with old growth characteristics. Western hemlock makes up most of the commercial species along with minor components of western red cedar, Sitka spruce and Alaska yellow cedar. The timber identified in this sale is largely on poorly drained organic soils with steeper areas of karst topography and limestone. The larger and better-quality timber is located on the well-drained soils with steeper terrain.

b. Stand silvics:

The timber in this proposed sale is of mixed quality and defective except in some of the areas with steeper, well-drained features. Comparable areas previously harvested by the USFS adjacent to the proposed sale appear to be fully stocked, vigorously growing and generally of even ages by stand. These stands are primarily composed of western hemlock, Sitka spruce, and western red cedar sapling and pole-timber. Evidence of tree species prior to harvest (stumps and snags) was that of hemlock and spruce types. Prior harvest areas contain generally better drained soils and features associated with limestone bedrock. The sites targeted in this timber sale are residual stands that were difficult to operate on due to terrain or had species composition less desirable under historical market conditions (red cedar). Western red cedar has contemporarily gained significant market value since that period as a species.

The DOF intends for natural reforestation to occur promptly. The growth of commercial timber species to a merchantable size will be encouraged in the shortest rotation length to support the objectives of the land management designation of the State Forest. The silvicultural prescription that best achieves these objectives is based on experience and will entail clear-cut harvest. Unit size is primarily a product of topography and forest type, respecting other constraints such as soil stability, high-value fish and wildlife habitat and visual concerns. The use of clear cutting is a proven regeneration prescription for most areas in SE Alaska and is also appropriate for removing large timber with its associated variable structure and size. Other regeneration/harvest prescriptions entail complex and costly methods that are more hazardous to loggers and risk damaging residual standing timber. Residual stands associated with partial harvest are also prone to damage in most areas of Southeast due to post-harvest wind-throw.

DOF will verify that levels of natural regeneration meet FRPA standards within prescribed regulatory timeframes. It is anticipated that some precommercial thinning will be prescribed and completed on regenerated stands located on the State Forest to influence the future production of merchantable products (typically saw logs) when those stands reach the stem exclusion stage at approximately 20-30 years of age.

c. Topography and Soils:

The proposed sale will be designed and managed to prevent significant impairment of the land and water with respect to renewable resources (AS 41.17.060(c)(5)).

The sale area occupies an area with broken topography ranging from low/moderate slopes to areas of short but steep rocky bluffs; aspect on most of the units

is primarily facing south and west. Elevation ranges from 20 to 800 feet within the sale area. Much of the sale area has slopes of less than 35 percent. Limestone, and other karst features are apparent on steeper terrain which also inherently experience better overall drainage. Conglomerate bedrock was observed in areas that are not limestone. Flatter terrain is found to have thicker organic soils composed of primarily feather moss mats with underlying rock and typically poor site drainage.

Limestone geology defines the shape of most of the units. Surface water was generally not present in the areas with limestone bedrock. Springs were generally emanating from the base of the limestone topography where the ground transitions to a consolidated and semi-impermeable brown cobble till that composed most of the sale area. Spring emergences from the hillsides were found in several units. These flow emergences correlated to the timber types in many cases. Streams below these emergences were generally incised in gravelly and cobble soil keyed to the brown sedimentary bed rock observed.

Karst geology was observed generally in all the units in some degree; the timber on these areas is more often a hemlock timber type and typically has evidence of a higher stand level wind disturbance. Units 1, 3, 8 and 9 contained higher amounts of landforms associated with endemic karst characteristics and likely have subsurface hydraulic conveyance. Generally, high or moderate value karst was not observed in the sale footprint.

Karst characteristics that may be more susceptible to hydraulic change (damage) have been field identified and accommodated in the design of the harvest units. Harvest operations will be instructed to maneuver and manipulate timber and slash to minimize post-harvest soil erosion and to maintain surface water patterns. Sediment movement is recognized as a risk to karst structures and will be mitigated where it manifests itself.

2. Agriculture.

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

3. Wildlife habitat and harvest.

This sale has been designed following applicable planning guidelines and to promote statements of management intent for each of the types of land classification contained in the SESFMP, the POWIAP and the Alaska Forest Resources and Practices Act and Regulations (FRPA). The sale area was not identified as crucial habitat (Ha) or prime habitat (Hb) in the POWIAP or the SESFMP.

Most of the lands in this proposed timber sale are co-designated Settlement and Recreational classified land. While these uses are identified as the highest and best use in the area plan, they do not preclude other uses such as habitat when it is identified as important on a site-specific basis in support of wildlife or fisheries.

AS 38.04.910(5)(A) implies that multiple use management means the “use of some land for less than all of the resources.” Section 41.17.060(c)(7) of the Alaska Forest Resources and Practices Act (AS 41.17) states that “allowance shall be made for important fish and wildlife habitat.”

A portion of the area in the proposed timber sale are on State Forest land. Section 41.17.200(a) of the same act states in part; “the primary purpose in the establishment of a state forest is timber management that provides for the production, utilization, and replenishment of timber resources.” Other uses on State Forest land must be considered and permitted unless they are found not compatible in a finding (AS 41.17.230).

POW has a total area of approximately 2,577 square miles. The amount of land harvested by the El Capitan timber sale is small in comparison to the size of POW (0.02%). Most of the land on POW is owned by the USFS with minor amounts in private and other public ownerships.

The USFS has reserved productive old growth timber (POG) to support non-timber values (such as fisheries and wildlife) in the 2016 Tongass Land Management Plan. In all Plan alternatives, less than one percent of POG is projected to change, due to harvest, in the next 100 years. The USFS signaled in the fall of 2021 that it was shifting its focus in general on the Tongass away from old growth timber harvest. With this signal, even less old growth harvest is likely to occur on federal land in the timeframe.

No areas of concern were identified by ADF&G (Division of Wildlife Conservation) in the comments received associated with the FYSTSs. The DOF further communicated with ADF&G during the preparation of this decision. Under the FRPA, the DOF will provide due deference to ADF&G for designing the retention of timber or to modify harvest activity during operations for the management of important wildlife species.

DOF staff did not observe wolf or bear dens within the units during timber reconnaissance efforts, unit layout or road location. No known wolf or black bear dens are in or adjacent to the sale area per ADF&G.

Per ADF&G, the proposed units have value for deer habitat due to their relative location to the previously harvested areas on state and federal land that is now in a regeneration status with varying ages. ADF&G’s analysis of the timber sale area is there is adequate winter habitat outside of the proposed state harvest areas. The

units are not situated relative to large topography that will hold late season snow and thus concentrate and precipitate use of the terrain for distinct wintering activity any more than adjacent terrain. The deer activity observed by DOF in the spring and fall was relatively dispersed. Wildlife activity associated with deer, bear and wolf was observed along anadromous stream 105-42-10110 and its associated tributaries in the form of game trails. These observations correlate for the most part with ADF&G's collared deer studies in the area. ADF&G combined several habitat models with collared deer data to apply a predicted importance to the timber sale footprint. It projected that approximately 20% of the sale area as having important seasonal habitat scores for deer. This timber sale will likely remove important winter deer habitat, but important winter deer habitat will remain in between these timber sale units. Due to the remaining important habitat in between the timber sale units, ADF&G does not have major concerns for impacts on deer populations or the predator populations that rely on deer.

The change resulting from harvest, in availability of deer on POW either for wolf predation or for take by humans is projected to be minor. A reduction in deer habitat in the immediate area may be expected because of the harvest of this timber. Deer numbers are expected to remain approximately the same following harvest and as the stand regenerates but are expected to diminish as the understory is shaded out during mid-rotation, approximately 30 years following harvest. Consequently, and without intermediate stand treatment (pre-commercial tree thinning) the act of the harvest of timber will eventually lower the capacity of the immediate area to provide for deer habitat values during the period of 30 to 65 years, at which point the understory will gradually provide more long-term food capacity, and the overstory will provide more snow interception and thermal cover. Pre-commercial tree thinning at the canopy closure stage but immediately prior to stem exclusion could extend the period when forage is available to deer mid-rotation.

The USFS has thinned some of the adjacent timber stands for a variety of reasons but mainly to encourage sawlog timber growth. The stem exclusion phase post thinning on these young growth stands has already occurred. Harvesting timber adjacent to these thinned stands would generally provide a boost to the area's food capacity until its stem exclusion phase. It is also likely that some of the area's young growth will be harvested at about the same time as the stem exclusion phase would be reached in this proposed sale area after it is harvested; this scenario would likely provide a source of browse in those areas at about the same time browse availability is projected to decrease in this proposed sale footprint. This sequential mix of timber types would typically benefit wildlife populations like deer that tend to use the disturbance areas for their associated cover and food.

Human interaction with wildlife occurs mainly associated with the area's proximity to the community of Whale Pass and the POW road network. Hunting and trapping occur in the area. Evidence of roadside trapline(s) for mink and martin was seen on

the 2000 Road. The project area likely receives limited use for hunting away from the existing road system due to the thick vegetation and terrain. Once accessed by spur roads, hunting by humans and wolves typically increases; this tends to be considered “normal” for a period until the vegetation obscures ready wildlife viewing at 20 plus years post-harvest. The perceived reduction in deer population by humans after that point precedes the downturn in deer numbers in the area by several years due to diminishing access and visibility of the deer to the roads and areas that people can access easily by foot.

The roads associated with the timber harvest will provide some additional access for human activities associated with wildlife. Regardless, added hunting pressure is not anticipated to be significant due to the proximity of the large road network elsewhere on POW. Another mitigating factor will be the intent of the DOF under the FRPA to close roads to vehicle traffic.

Some wolf sign on the existing roads was observed by DOF in the preparation of the sale. The relative importance of the area for wolves on the island was discussed with ADF&G. The value of the area for wolf habitat is typically proportional to the area’s value for deer habitat. The area’s importance for deer habitat is considered nominal. Wolves primarily would be in the area to consume the deer for food or take advantage of other conditions in the area such as in estuaries and fish streams. Some evidence of winter deer mortality was observed in Units 1, 5 and 6 but was not directly attributable to wolf kills.

Deer will continue to be present in numbers adequate for a sustainable wolf population on POW with the development and use of these state lands. The viability of the island for sustaining wolves is not projected to be influenced significantly due to this project. Impacts to the wolf population by hunting and trapping may increase due to the added road access; this again is thought to be minor though because a large part of the island is currently already accessed by humans via existing roads. Wolf populations generally follow the deer population trends unless targeted by humans through focused hunting and trapping pressure.

The DOF will leave unharvested the timbered area within 300 feet of anadromous stream 105-42-10110 in deference to the observed wildlife travel and cover attributes it provides. In recognition of the value of the area to several different resources, the unharvested corridor’s north side is the 2000 Road and is more than 300 feet in several areas. This effectively leaves a significant cover and travel corridor from tidewater to the ridge system to the northwest and the Twin Island Lake area.

The DOF used available federal information on bald eagle nest locations and field observations during scoping to avoid cataloged nest sites. No nests were observed

or documented in the process of designing the timber sale. If nests are found, they will be given at least a 330-foot retention area of undisturbed timber.

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

4. Fish Habitat, water resources, and water quality. The proposed sale will be designed and managed to protect fish habitat and water quality in compliance with the Forest Resources and Practices Act and regulations (AS 41.17 and 11 AAC 95). The DOF has mapped surface drainages encountered in field design of the units as well as obvious adjacent drainages using remote sensing (LDIR and aerial imagery).

As required by AS 41.17.098, DOF provides due deference to ADF&G to ensure all fish and wildlife habitat issues are addressed by the proposed timber sale design. Likewise, DOF provides due deference to the Alaska Department of Environmental Conservation (ADEC) for all water quality issues. The ADF&G-Habitat Biologist in Craig and other staff are familiar with the area. ADF&G staff visited the more significant streams in 2016 through 2018 associated with the Sustainable Salmon Program Grant and verified the extent of habitat.

Several cataloged anadromous streams (105-42-10110 and 106-30-10800-2050) are located adjacent to the sale area. The topography of the area other than in these areas is generally too steep for fish bearing waters along much of the coastal area. No additional anadromous streams were identified during layout of the sale. The identified streams have received timber retention areas and are flagged on the ground at distances from the stream greater than the 100 feet either side as required by AS 41.17. Tributaries to these streams were visited proximate to the proposed units and all deemed to be too steep and did not exhibit anadromous habitat characteristics. These tributaries are delineated on the maps and will receive site specific management by DOF as needed during timber sale activity to maintain water quality considering their source contribution to anadromous fish habitat.

5. Settlement, recreation, tourism, and scenic resources. The POWIAP identified an objective to maintain aesthetic qualities and recreation values of the El Capitan area by minimizing development on the waterfront of Twin Island Lake and El Capitan Passage associated with settlement. The DMLW and the DOF considered this objective relative to terrestrial access (roads) which was also desired in the plan. The two objectives were discerned to be in opposition in some areas for some users but considered to be rectifiable. This perspective is based on the propensity and resilience of Southeast Alaska to grow trees within the time frame of likely residential and recreational development. Creating initial access through a timber sale prior to settlement development also avoids direct conflicts of aesthetics and use in residential areas. Providing physical access up front facilitates establishment of long-term access

corridors to the State Forest and Settlement land prior to being constrained by focused residential use. This also provides time for areas harvested to visually “green” in a similar manner to the harvest done previously by the USFS.

Commercial use of the area is currently associated with the saltwater sport fishing. Lodge and charter boat use of the area is focused to the west. Non-commercial recreation in this part of Southeast Alaska is typically dispersed and remote in nature. Users of the area are typically passing through to other locations on either the road or El Capitan Passage by boat. Past timber sales have provided road access for dispersed recreational opportunities and this timber sale will provide similar access. Without the road access provided by the past harvest, upland public use would be significantly constrained by terrain and vegetation. Upland recreational use would, for the most part, not be present or be relatively rare. This timber sale is expected to result in no significant changes to current recreational use.

The Twin Island Lake receives occasional public use for its fish resources in the summer and early fall and provides an aesthetic setting. The past timber harvest is now covered with young growth of ages between 30 and 50 years. The area by Unit 4 was observed to not have specific shoreside value for direct recreation use due to the broken terrain. The backdrop of the lake can be easily observed for a short distance where the 2700 Road is adjacent to the lake on its west end. The proposed Unit 4 will be visible as it extends up the hill north of the lake and road; a retention area of more than 100-foot width is proposed adjacent to the lake per statutory requirements associated with the fish habitat of the lake and several small tributary streams. The retention area provides transition but does not obscure the harvest. While access to the lake is currently undeveloped (primitive), small craft that are on the lake in the next several decades will see the harvested unit’s upper extent. Portions of the top of the knob occupied by Unit 8 will also be visible from the lake.

Units 1, 2 and 5 are adjacent to saltwater and placed accordingly to provide basic access to the area for forestry and future settlement use. All these units will look like the surrounding mottled hillside inside of twenty years and are broken in view by topography.

Road access may provide a more ready form of hunting access for vehicle-based or pedestrian hunters, but relative to the overall availability of similar areas on POW, it is a minor addition. ATV traffic will not be actively managed. Typically, unless cleared of alder by incidental users, the roadbeds will not be drivable by ATVs within approximately fifteen years following completion of timber sale closeout operations.

The DMLW has subdivided the southeast corner of Section 11 (ASLS No. 2019-05). The subdivision is currently undeveloped. The DNR advertised some of these lots in the Alaska State Land Offering—Auction #493 in calendar year 2022. These lots are one-quarter of a mile to the west of Unit 1. This land sale will have limited visibility

to the timber sale due to the retention area adjacent to anadromous stream 10542101000 (Turn Creek) and intervening topography.

The classification configuration of state land at El Capitan makes it desirable for DOF to develop initial access through the Settlement classified land to actively manage State Forest land in the future. With the State Forest north and south of the settlement land otherwise constrained by federal ownership, the DOF has focused effort overall on creating access via state land due to the uncertainty of federal access and use. Per the POWIAP, timber sales in settlement land are to benefit the eventual settlement classification. DNR interprets this to mean that roads are beneficial to the economics and practicality of a settlement project if they do not preclude the primary classification. The proposed timber sale is projected to develop the pioneering access typically needed for more permanent roads and economical survey work associated with subdivision development. The forest roads provide functional access for later lot development and facilitate road right of way construction that is not solely dependent on high initial private or government startup capital. Additionally, while forest values are recognized as desirable to many remote Alaskan experiences, the removal of large trees proximate to building sites, utilities and roads is generally beneficial to safer development of land, particularly in Southeast.

Where timber exists in the tract, it was considered appropriate to include it to contribute to the revenue of the project if it did not significantly detract from other resources values to provide scale for developing access in the tract.

It was determined through the project reconnaissance that some areas classified as Settlement are likely not suitable for a subdivision because of the terrain or other resources (such as streams). In these areas, the land and roads will likely serve in the long term to support overall resource values and be reserved from land sales. Some of the area could support future silvicultural management if compatible with the adjacent uses when the timber reaches merchantability.

The POWIAP identified the scenic setting of the El Capitan Passage as a resource to consider relative to the observed and projected uses in the area. More specifically, the POWIAP forestry management intent is that future timber harvest operations should, in the preparation of the Forest Land Use Plan, provide a buffer separation from Twin Island Lake to protect viewsheds, between harvest and proposed disposal areas, and at anadromous streams and other significant habitat areas. The DNR has avoided harvest within 300 feet of the cataloged riparian areas in support of fish and wildlife values and secondarily to aid in the maintenance of the visual resource. Topography draped with the different vegetative covers cast the setting in the area. Portions of the proposed timber sale will be visible from the waters of Twin Island Lake or El Capitan Passage. This existing and proposed mixture of vegetation types on the landscape is like many viewsheds on POW. There are previously harvested areas within this project viewshed that are already a mixture of dense lush

landscape that varies in structure and age. This timber sale will result in the same vegetation backdrop once reforested. Regardless, it is expected that over time, settlement areas adjacent to these shorelines will see development associated with residential lot development that will be different than the existing conditions. Retention of all timber and shielding all development from the various access points is not a reasonable expectation with the objective of providing proximate access to land suited for remote settlement. It is observed that the higher valued lots in Southeast are associated with waterfront and view lots. While the proposed harvest will be visible from the waterbodies, it by contrast to residential development is temporal and will be reforested within the timeframe that most settlement is projected to occur in the area. The other factor considered by DNR was the quantity of the scenic resources in the area and region. While the immediate area is an attractive setting, it is reasonably like other areas on the island and in the archipelago of Southeast and is only a small portion of the broader setting. With management changes on the Tongass National Forest, the likelihood of significant adjacent landscape change is low to nonexistent in the time frame of the reforestation in the project area.

6. Cultural Resources.

DOF works with the State Office of History and Archeology (OHA) to identify and avoid known cultural, historic or prehistoric sites in planning the proposed access routes and timber sales. State archaeologists have visited the sale area several times. The OHA did not note specific concern in their 2022 review of this project.

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

7. Subsurface Resources.

No mineral claims are present on the proposed sale area. Several claims are located to the south and west of the sale area. These claims are for limestone, gold, and molybdenum. The timber sale is not expected to affect use of or access to these claims. Road activity may offer further insight to below ground conditions or provide future access for exploratory effort.

G. Costs and benefits

Based on DOF observations of the project area resources and markets, timber revenue is projected to cover administration, access and operating costs for this sale area and provide stumpage royalty to the State. Making the timber available on State Forest 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. Making the timber available on the Settlement classified land similarly responds to the market demand.

Access will also be established to State Forest land that will be of benefit for future forest management and use. On Settlement lands, terrestrial access will be proximate to likely future residential development and coastal areas identified by the DMLW as having value to the state for future community development and recreation.

Logging roads in general have pioneered access to much of SE Alaska. Forest roads have provided many people initial access to land and secondary projects. They are scalable and regularly used in a similar format to build more refined roads. They are appropriate for the timber harvest and outlook for settlement given the lack of certainty of the future development. The forest roads will be constructed to the DOF standards that account for the foreseeable uses. The DOF has worked with the Land Development Section to place feasible alignments that could be upgraded to applicable American Association of State Highway and Transportation Officials Guidelines for Very Low Volume Roads in the future. To construct a higher order road in all parts of the settlement area at this time is not needed to remove the timber and is not a reasonable expectation relative to the other needs of the state.

Timber sales have traditionally created broad economic benefits to the communities of Southeast Alaska. The business communities on POW and to certain extent 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.

While scoping this decision and the Whale Pass timber sale in the community of Whale Pass, several commenters voiced a desire for local businesses to benefit from timber harvest operations. The remote aspect of the area will likely require some amount of locally based support for operations (equipment maintenance, housing needs, etc.). The management intent for the timber sale is to allow for as much of the timber as is economically feasible, to be locally processed in Southeast Alaska and specifically on POW. It is anticipated that the residents of the communities in Southeast Alaska will receive a direct benefit through employment opportunities by the operator during the timber harvest and milling operations. The DOF in the past has sold significant timber on the island to small mills and to the mill owned by Viking Lumber Company in Klawock. The DOF plans to continue a similar approach to the extent that timber sale economics and budgetary conditions make it prudent.

The timber removal from settlement areas can be an economic hurdle to land and right of way development and is typically an obstacle to utility installation. Mobilization and capitalization costs are typically a barrier unless done at scale for site development. To protect the State's interest, its land disposal policy restricts the removal of resources (timber or rock) until the State has been paid in full by a purchaser; this policy in practice limits lot development to those with significant working capital. While some lot developers have the

capability economically, it is inherently a constraint. Removing timber in a planned manner and in bulk creates scale to effectively manage and market it to the benefit the parties involved and sets the stage for smaller land purchasers to occupy and develop the lots at the time of purchase.

The timber industry has requested timber at the scale presented that is currently lacking on federal land. A sale of this size is achievable and appropriate given the State's resources. This sale provides the potential for significant jobs during a time of economic anxiety. Providing the timber at scale also provides a market base for wood procured by smaller operators elsewhere in the region and contributes to maintaining the resident skill sets and contractor capacity to handle timber overall in the region, regardless of scale. Due the general competitive interest on POW and goal to process the timber locally, the DOF proposes to use the request for proposal process for selling the sale.

The DOF projects that it will generally require a sale covering most of the proposed area to provide adequate capital for mobilization, access, and timber removal. The timber sale may also be bundled with the Whale Pass timber sale depending on the scope of interest, market conditions and projected costs at the time that the sale is executed. The distance from the existing mills on the island is farther than most timber sales sold in the past 20 years on POW Island. While this is significant it does not appear to be an economic barrier.

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 August 26, 2022. Notices were also posted at the Ketchikan, Craig and Whale Pass 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, Whale Pass, 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.

VII. PUBLIC COMMENT

DOF received in a timely manner 346 comments on the preliminary best interest finding noticed on August 26, 2022, from 342 interested individuals, three organizations and one agency (DNR Office of History and Archeology).

The Alaska Department of Fish & Game, Division of Habitat and Division of Wildlife Conservation affirmed their previous scoping comments and provided information used in the comment replies. The DNR-DMLW- Southeast Region and the Land Conveyance Section likewise reviewed the comments.

The comments are summarized in Appendix D. The comments are based around the resources discussed in the Preliminary Best Interest document. Significant comment was received on harvesting old growth timber, associated cumulative impacts, the appropriateness of land and resource use, karst geology erosion and sediment risk, the risks of road construction, landslides, scenic resource harm, cultural resources in the area, climate change, subsistence hunting, streams/fisheries, and wildlife habitat and timber demand and sale economics.

VIII. DISCUSSION, FINAL FINDING and DECISION

After due consideration of all pertinent information, the ADNR has reached the following Preliminary Decision: to offer for sale approximately 340 acres of old growth forest composed of western hemlock, Sitka spruce, western red cedar and Alaska yellow cedar from State Forest land and Settlement classified land on Prince of Wales Island as described in this BIF. Harvest activities on the State Forest lands will follow the management intent of the Southeast State Forest Land Management Plan. Activities on Settlement land will follow the management intent of the Prince of Wales Island Area 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

Date

VIII. DISCUSSION, FINAL FINDING and DECISION

After due consideration of all pertinent information, the ADNR has reached the following Preliminary Decision: to offer for sale approximately 340 acres of old growth forest composed of western hemlock, Sitka spruce, western red cedar and Alaska yellow cedar from State Forest land and Settlement classified land on Prince of Wales Island as described in this BIF. Harvest activities on the State Forest lands will follow the management intent of the Southeast State Forest Land Management Plan. Activities on Settlement land will follow the management intent of the Prince of Wales Island Area 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

4/3/2023

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 on April 25, 2023.

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>.

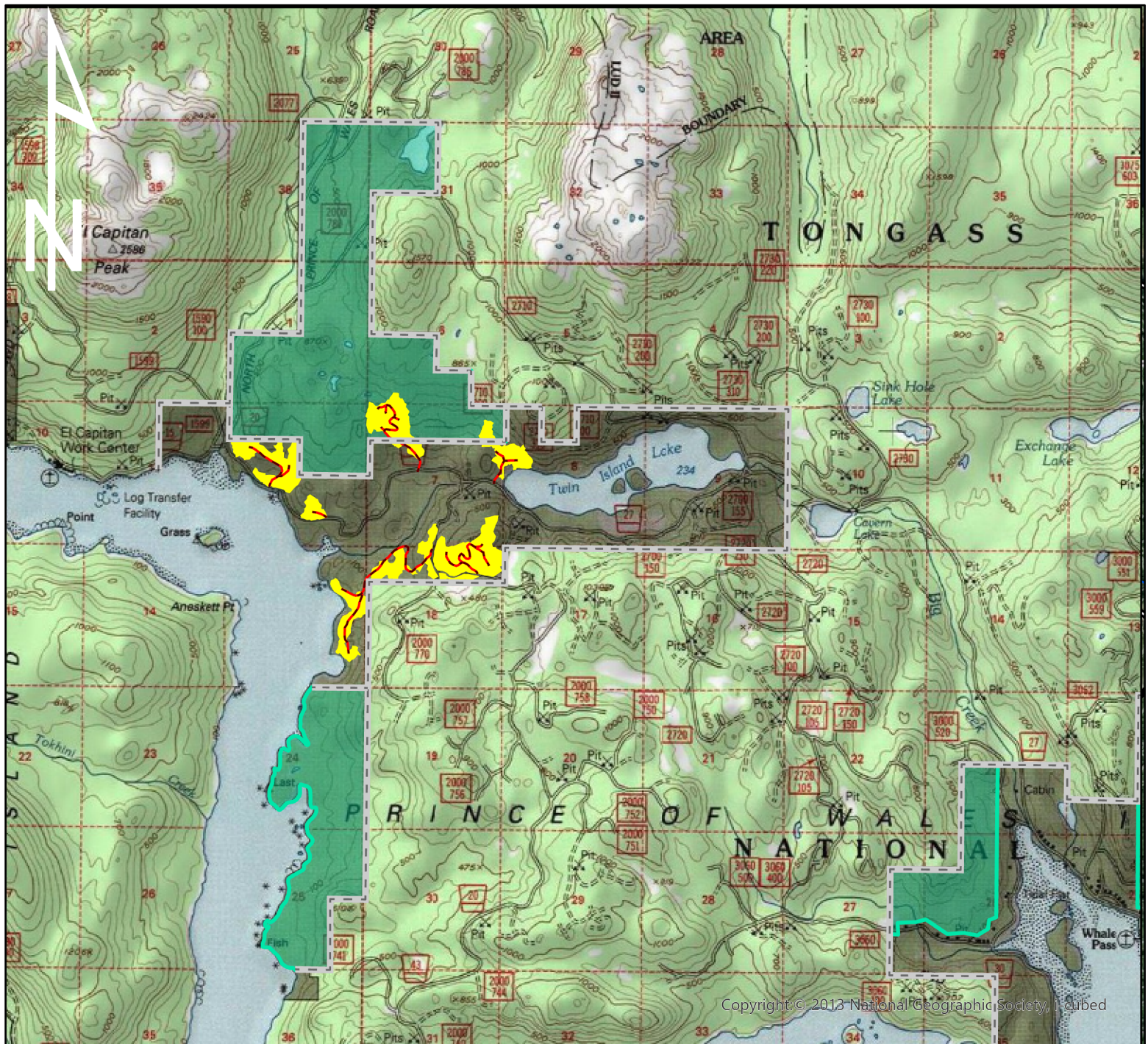
If you have any questions, please contact Greg Staunton, Southeast Area Forester, greg.staunton@alaska.gov, 907.225.3070.

XI. APPENDICES

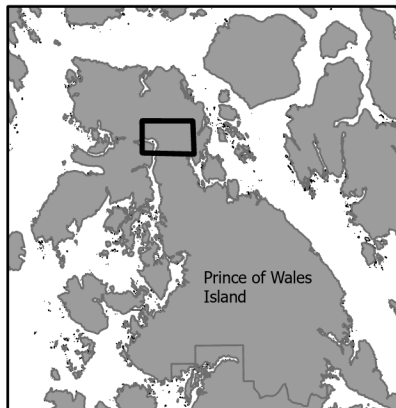
Appendix A	SSE-1380-K El Capitan Timber Sale Area Maps (4 pages)
Appendix B	References
Appendix C	Appeal Regulations
Appendix D	El Capitan Timber Sale Comments & Responses

Appendix A SSE-1380-K El Capitan Timber Sale Area Maps

(Four pages)



0 1 2 Miles
Area Map 1 in = 1 Mile



Vicinity Map 1 in = 32 miles

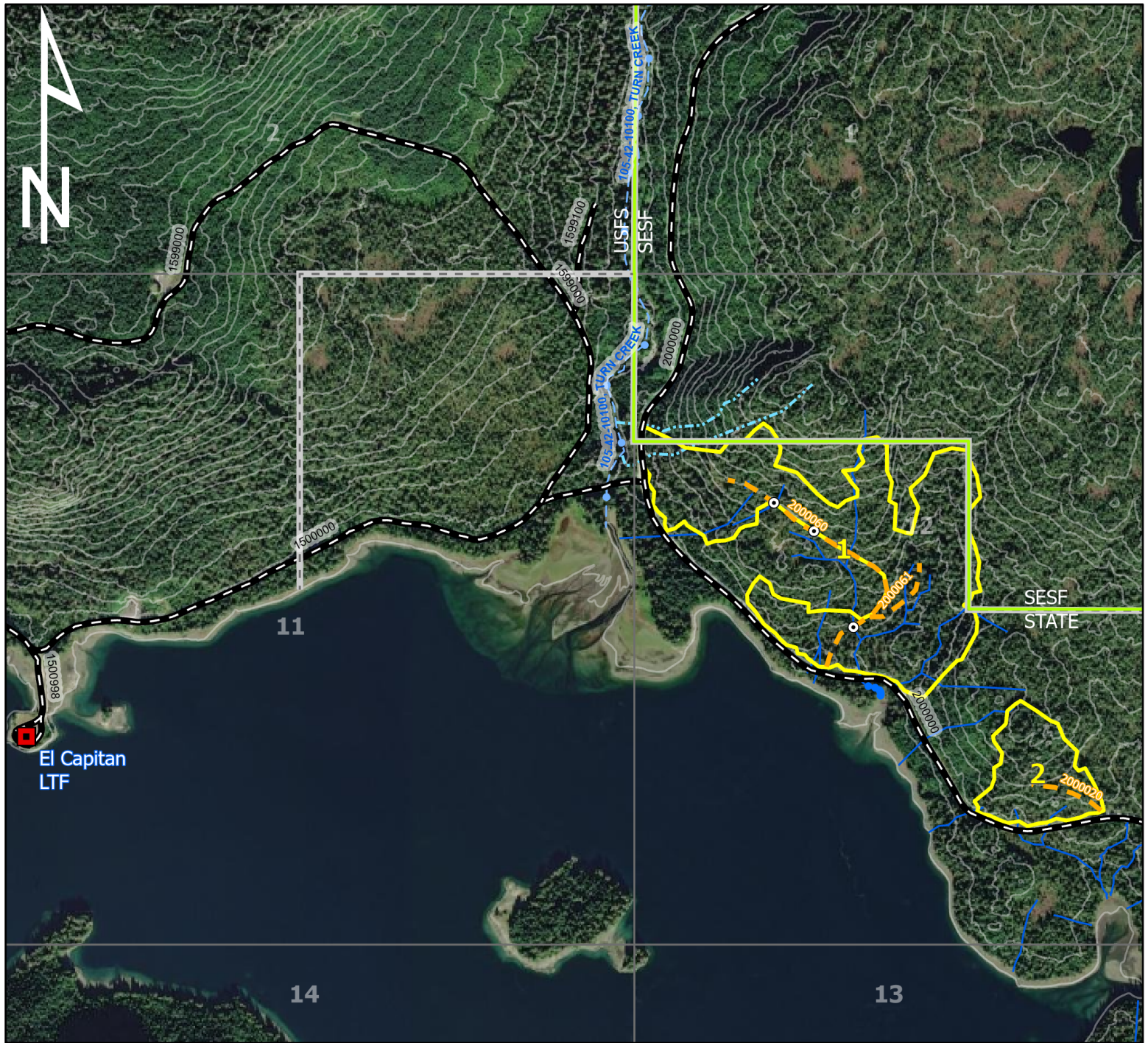
LEGEND

	Property Line
	Proposed Road
	Other State/Private Land
	Proposed Harvest Unit
	Southeast State Forest



APPENDIX A1 SSE-1379-K EI CAPITAN TIMBER SALE AREA MAP

TC 08/25/2022

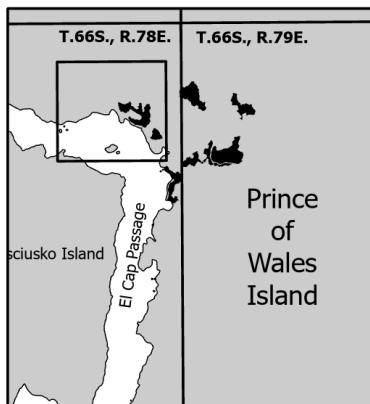


0 1,000 2,000 4,000 6,000 Feet
Sale Map 1 in = 2,000 FT

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

Contour Interval = 40 FT
Source: USFS LiDAR 2018

APPENDIX A2 SSE-1379-K EI CAPITAN TIMBER SALE MAP 1 UNITS 1, 2



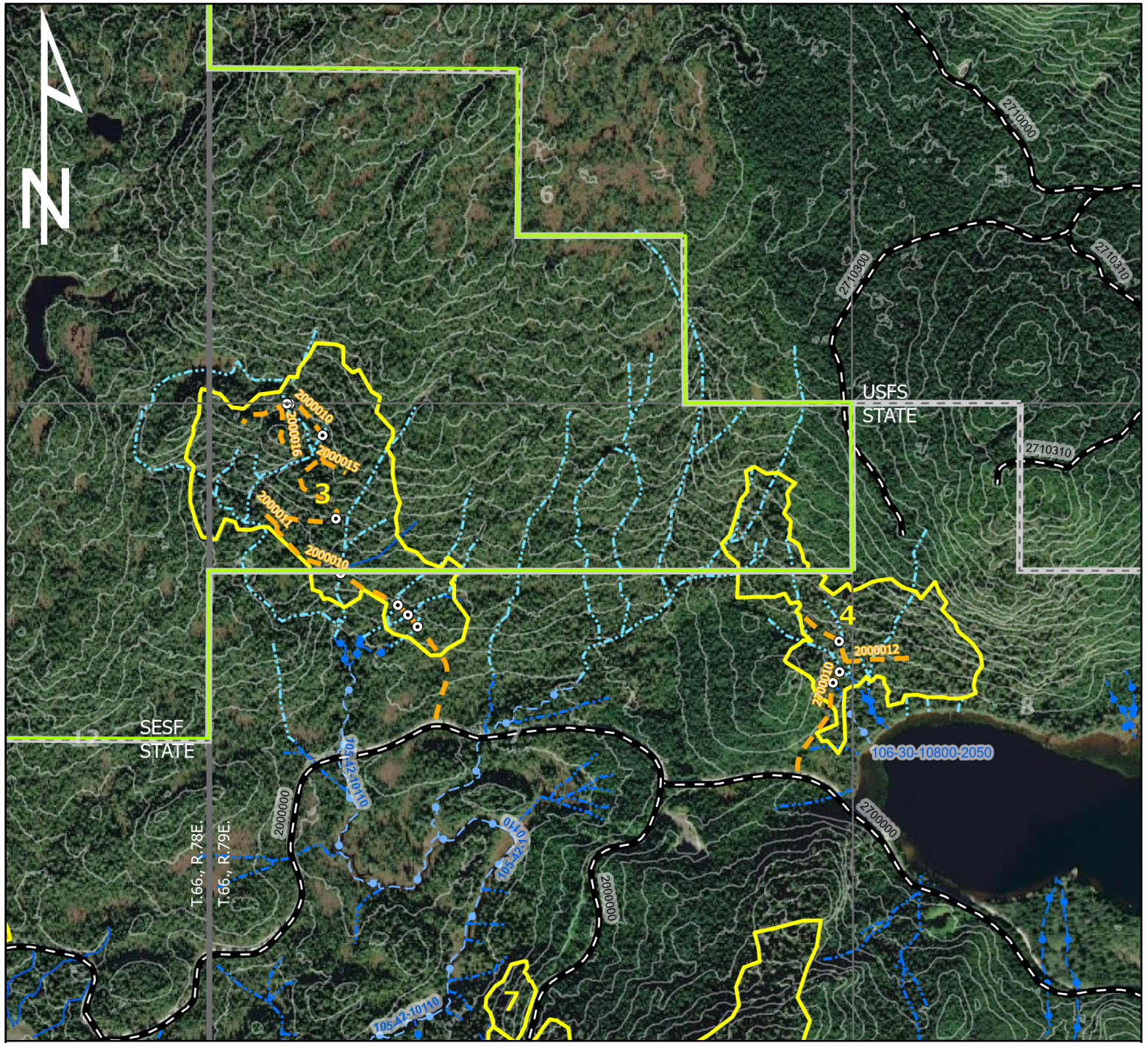
LEGEND

- | | |
|-----------------------------|------------------------------|
| Southeast State Forest | Cataloged Anadromous |
| Harvest Unit | Non Cataloged Anadromous |
| Property Line | Tributary to Anadromous <12% |
| Existing Road | Tributary to Anadromous >12% |
| Proposed Road | General Water Quality |
| Proposed Drainage Structure | |
| Log Transfer Facility (LTF) | |



Vicinity Map 1 in = 3 miles

TC 08/25/2022

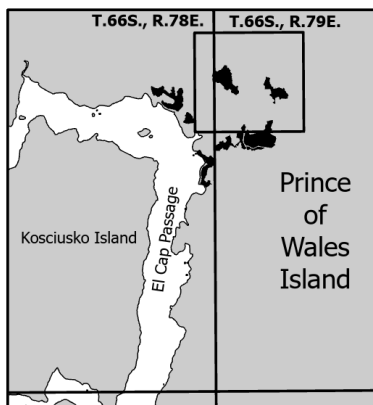


0 1,000 2,000 4,000 6,000 Feet
Sale Map 1 in = 2,000 FT

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

Contour Interval = 40 FT
Source: USFS LiDAR 2018

APPENDIX A2 SSE-1379-K EI CAPITAN TIMBER SALE MAP 2 UNITS 3, 4

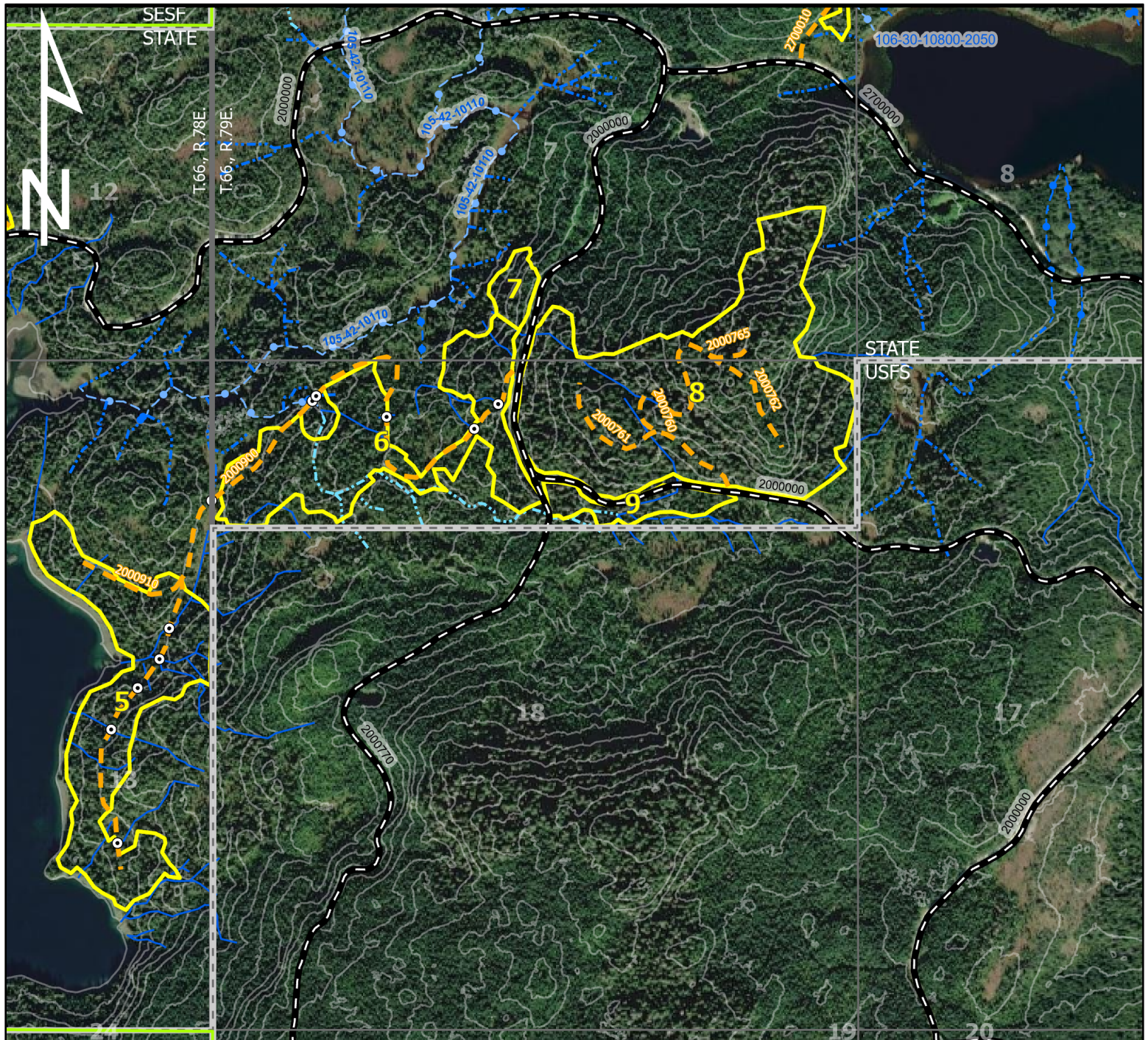


LEGEND

Southeast State Forest	Cataloged Anadromous
Harvest Unit	Non Cataloged Anadromous
Property Line	Tributary to Anadromous <12%
Existing Road	Tributary to Anadromous >12%
Proposed Road	General Water Quality
Proposed Drainage Structure	



TC 08/25/2022

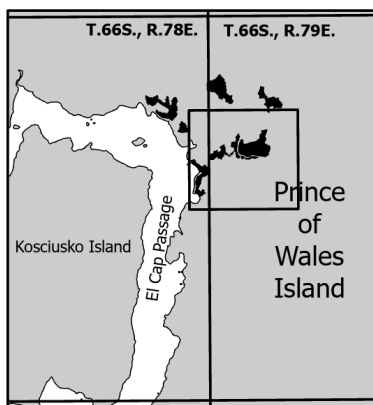


0 1,000 2,000 4,000 6,000 Feet
Sale Map 1 in = 2,000 FT

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

Contour Interval = 40 FT
Source: USFS LIDAR 2018

APPENDIX A2 SSE-1379-K EI CAPITAN TIMBER SALE MAP 3 UNITS 5, 6, 7, 8, 9



LEGEND

Southeast State Forest	Cataloged Anadromous
Harvest Unit	Non Cataloged Anadromous
Property Line	Tributary to Anadromous <12%
Existing Road	Tributary to Anadromous >12%
Proposed Road	General Water Quality
Proposed Drainage Structure	



Vicinity Map

1 in = 3 miles

TC 08/25/2022

Appendix B References

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

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

Alaska Department of Natural Resources, Division of Forestry, Forest Road and Bridge Standards. Available for download at: http://forestry.alaska.gov/Assets/uploads/DNRPublic/forestry/pdfs/resources/forest_road_standard_design_20151231.pdf and http://forestry.alaska.gov/Assets/uploads/DNRPublic/forestry/pdfs/resources/forest_bridge_standard_design_20150128.pdf

Alaska Department of Natural Resources, Division of Forestry, Southern Southeast Area Office, Five-year Schedule of Timber Sales. Retrievable from: <http://forestry.alaska.gov/timber/ketchikan.htm#fiveyear>

Alaska Department of Natural Resources, Division of Forestry, Southern Southeast Area, Operational Forest Inventory for State and General Use Lands, Adopted July 17, 2020. Report retrievable from: <http://forestry.alaska.gov/timber/forestinventories>

Alaska Department of Natural Resources, Division of Mining Land and Water, Prince of Wales Area Plan, Adopted: Revised October 1998. Retrievable from: <http://dnr.alaska.gov/mlw/planning/areaplans/>

Alaska Department of Natural Resources, Division of Mining Land and Water, Auction 493, 2022 Alaska State Land Offering. Retrievable from: <https://dnr.alaska.gov/mlw/landsales/brochure/file/50/brochure>

Alaska Department of Natural Resources, Alaska Mapper. Available for access at: <http://dnr.alaska.gov/>

Bingham, Delilah, Deputy District Ranger, Thorne Bay and Craig Ranger Districts, United States Forest Service, Email on North POW USFS Infrastructure Conditions 12/21/2021.

British Columbia Ministry of Forests, Forest Practices Branch, Introduction to Silvicultural Systems. Web site accessed at: <http://www.for.gov.bc.ca/hfd/pubs/SSIntroworkbook/even-age.htm#patch>

Catalog of Waters Important for Spawning, Rearing, or Migration of Anadromous Fishes- Southeastern Region, Alaska Department of Fish and Wildlife, Division of Sport Fish and Habitat,

Effective July 2013. Available for viewing at: <https://www.adfg.alaska.gov/sf/SARR/AWC/index.cfm?ADFG=main.interactive>

Depew, Alan D., Alaska Archaeological Survey Unit, Office of History and Archaeology, Alaska Department of Natural Resources. Survey Reports and Personal conversation.

Hasbrouck, Tessa, Area Wildlife Biologist, Alaska Department of Fish and Game, Division of Wildlife. Personal communications.

King, John, Land Sales Section, Alaska Department of Natural Resources, Division of Mining, Land and Water, personal communication 2020-2022.

Minnillo, Mark, Area Habitat Biologist, Alaska Department of Fish and Game, Division of Habitat, Personal communication.

Reynolds, Nick, Forester, Thorne Bay Ranger District. Personal communication.

United States Forest Service, Region 10, Engineering Cost Guide.

United States Forest Service Geographic Information System Database.

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

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

White, Ben Southeast Regional Manager, Alaska Department of Natural Resources, Division of Mining, Land and Water, personal communication 2022.

Wikipedia. Shovel logging. Accessed at: http://en.wikipedia.org/wiki/Shovel_logging

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-1380-K El Capitan Timber Sale Comments & Responses

(35 Pages)

Appendix D

SSE-1380-K, El Captain Timber Sale Comments & Responses

Department of Natural Resources, Division of Forestry
March 2023

The following people commented on the Proposed El Capitan Timber Sale SSE-1380-K during or proximate to the comment period that ended on September 26, 2022.

Larry Edwards Alaska Rainforest Defenders
Sarah Meitl Alaska State Historic
Preservation Office
Steve Lewis Glacier Grotto of the
National Speleological Society
Katie Rooks Southeast Alaska
Conservation Council
Zach LaPerriere, Timberworks, LLC
Aaron Blust
Abby Pariser
Alden Leatherman
Aleta Utterback
Alex McVickar
Alex Witt
Amanda Kiely
Amy Aykes
Amy Lundstrom
Amy Schaub
Andrea Hernandez
Andrea Jordan
Angie Dixon

Angus Macdonald
Anissa Berry
Ann Eckmann
Ann Nowicki
Anna Connolly
Anna Cowen
Annette Coomber
April Deardorff
Ashley Council
Becky Long
Ben Coombs
Ben Houdek
Ben Kirkpatrick
Ben Sullender
Benjamin Hughey
Benjamin Van Alen
Berit Solstad
Bert Corley
Billy Martin
BJ Robinson
Blake Laperriere

Bob Hall
Bonnie Demerjian
Borja Rodriguez
Brandy Ward
Brian Coxen
Brian Davies
Brian Gringas
Brian Wyberg
Cameron Livingstone
Carin Wagner
Carl Dejka
Carly Hurst
Carmen Katasse
Casey Melnik
Catherine Bode
Cathine Buchanan
Chandra Oshima
Cheryl Fecko
Cheryl Fecko
Chloe Van Loon
Christian Thalacker

Christine Callahan
Christopher Dailey
Clara Bauman
Clay Friick
Cliff Alton
Cody Drake
Colin Arisman
Colin Peacock
Connie Harris
Conrad Muller
Dagmar Pelka
Dan Cannon
David Andruss
David Cabana
David Love
David Skelly
Dean Cifelli
Dean Webb
Dean Webb
Debra Kemp
Deirdre Downey
Della Cheney
Denis Ransy
Don Muller
Donald Hernandez
Donald McMillan
Donna Delany
Donna Mulvey
Doug Rhodes
Doug Robbins
Duane Larson
Duncan Kerst
Ed Douville
Elsa Sebastian
Emily Bass
Emily Ferry

Eric Jones
Erin Barca
Erin Miller
Ernie Eggleston
Eva Christensen
Evan Deisen
Frank Jacob
Frank Keirn
Gabrielle Markel
Gail Sterling
Gary Goetz
Gary Koppelman
Geoff Regalado
George Peterson
Gina Hackett
Glen Anderson
Greg Houska
Greg Martinez
Gregg Tresham
Greta Healy
Hallie Brown
Helena Fagan
Holly Dean
Holly Fogus
Honesty Zahnd
Ilsa Barrett
Iolana Billet
Iona Park
Isaac Gromacki
Ivan O'Neill
Jack Dodson
Jackson Mathew
Jacob Stewart
Jacob Yastrow617
James Baichtal
James Brennan

James Mackovjak
James Slater
James Stratton
James Taggart
James Unger
James Warren
Jamie Corson
Janet Angel
Janice Huynh
Jason Parkin
Jean Millkey
Jean Millkey
Jeanette McBride
Jeff Budd
Jeff Deardorff
Jeff McKay
Jeff Sloss
Jenna Krzesicki
Jenny Simpson
Jeremiah Youmans
Jessie Barker
Jessy Goodman
Jill Bohr Jacob
Jill Wittenbrader
Jill Wittenbrader
Joan McBeen
Joanne Frank
Joe Aultman-Moore
John Cornely
John Equitz
John Roxburgh
John Sonin
JoLynn Jarboe
Jon Brock
Jon Gaedke
Jordan Rashea

Joshua Baugh
Judy Magnuson
Judy Villablanca
Julia Hubbard
Julia Reams-Giersch
Julia Reams-Giersch
Julia Reams-Giersch
Julia Whelan
June Yamrick
K Murphy
Kaarle Strailey
Kara Berg
Karen Wilson
Karen Wolf
Karla Hart
Karly Foster
Kassandra Lisenbee
Kate Hesler
Kate Sandberg
Katherine Murdock
Kathleen Mirault
Katrina Peavey
Kay Kreiss
Kelley Watson
Kendaal Strailey
Kenneth Bawer
Kevin Miller
Kimberlee Mikos
Klayton Curtis
Klayton Curtis
Klayton Curtis
Kristy Hill
Kyle Irby
Kyle Volkman
Larry Farin
Laura Baldwin

Laura Hanks
Laura Lucas
Lauren Cusimano
Leanne Friedman
Lesha Baldwin
Lesley Kempself
Lester Miller
Linda Kelly
Linda Prandi
Lisa Sadleir-Hart
Lisa-May Reynolds
Liz Clark
Lori Bauer
Luann McVey
Lucas Mesdag
Lucas Mesdag
Lynn Wilburn
Maddie Halloran
Madelaine Voegeli *
Malena Marvin
Maranda Hamme
Marc Hutchinson
Marc Watson
Marcel LaPerriere
Mareth Griffith
Margaret Dinon
Margo Waring
Marika Hintz
Marilyn Dougher
Marilyn Heiman
Mark Diaz
Mark Giardina
Mary Beth Hilburn
Mary Ohair
MaryClair Bernstein
Matt Hainstock

Matt Musick
Matthew Brodsky
Maureen Knutsen
Meeshka Brand
Megan Mcgeary
Mel Izard
Melicent Whinston
Melody Burdette *
Melody Shealy
Michael Kampnich
Michael Nigro
Michael Sallee
Michael Thompson
Mikayla Melnik
Mike Handforth
Mike Tickler
Mim McConnell
Monica Ritter
Monica Ritter
Morgan Buckert
Nancy McKlens
Nancy Taylor
Natalie Watson
Nathan Deweber *
Neil Waggoner
Nicholas Dalessio
Nicole Zegiestowsky
Nicolia Jiraff
Nikki Love
Nora Perlasca
Nora Sharp
Nora Skeele
Oscar Mace
Pat Layden
Patricia Dangle
Patricia Mckenzie

Patrick Comer
Paul Davis
Philip Ratcliff
Piers Strailey
Rachael Juzeler
Rachael Posey
Rachel Lackey
Rachel Youens
Ralph Wells
Richard Farnell
Richard Monkman
Rob Lawrence
Robert Andrews
Robert LaRue
Robert Pederson
Roberta Peterson
Robin Voves
Roma MacGregor
Ron Fibush
Ross Livengood
Ryan Morse
Rylee Middleton
Sage Dilts
Salissa Chavez
Sally Tarasoff

Salome Starbuck
Sandra Ashmore
Sandra Donahue
Santiago of Southeast Ak
Sarah Moody
Sarah Stewart
Scott Pearce
Scout Khelian
Sean Wheeler
Shannon Donahue
Sharon Paulovich
Shawn Emery
Shawn O'Donnell
Shelley Stallings
Sherrie Myers
Simon Hook
Stephanie Mason*
Steve Hughes
Steve Smith
Steven Hemenway
Stuart Cohen
Stuart Morton
Tania Lewis
Teague Whalen
Terry Cummings

Thomas Wood
Tim Murray
Timothy Coleman
Toby Campbell
Tom Boutin
Trevor Stauffer
Trevor Van Loon
Trey Jordan
Tyler Henegan
Ursula Cohrs
V Kulikow
Victoria McDonald
Virgene Link-New
Virginia Bottorff
Walsh Susan
Wesley Wolf
Weston Becker
William Evers
William O'Brien
Wilson Barrett
Yarian Izigzon
Yma Dandridge
Zachary Brown

*Comment submitted past deadline.

Table of Contents

Comments & Responses 1

General Timber Sale Comment 6

Land Use Classification/ Planning..... 7

Sustained Yield and Annual Allowable Cut 9

Timber/ Silviculture 11

Roads..... 14

Topography/ Soils/ Karst Resources 15

Wildlife 18

Subsistence Hunting..... 24

Streams/ Fisheries 25

Scenic Resources and Recreation 27

Cultural and Historic Resources 30

Climate Change..... 30

Timber Demand and Sale Economics 31

The following comments were received during the public comment period on the El Capitan Timber Sale Preliminary Best Interest Finding. Copies of the submitted comments are available upon request.

Commenter	Comment	Response
	General Timber Sale Comment	
All Form Emails	Not in favor of harvesting timber in Southeast Alaska.	Comments noted, no change required.
Lucas Mesdag	Not in favor of harvesting timber in Southeast Alaska.	
Jeff Budd	Not in favor of harvesting timber in Southeast Alaska.	
James Taggart	Not in favor of harvesting timber in Southeast Alaska.	
Ernie Eggleston	Not in favor of harvesting timber in Southeast Alaska.	
James Unger	Not in favor of harvesting timber in Southeast Alaska.	
Klayton Curtis	Not in favor of harvesting timber in Southeast Alaska.	
Ralph Wells	Not in favor of harvesting timber in Southeast Alaska.	
Gail Sterling	Not in favor of harvesting timber in Southeast Alaska.	
Glen Anderson	I VERY STRONGLY OPPOSE the current plan to offer the El Capitan timber sale!!!	
Steve Smith	Your timber sale in the El Capitan area concerns me, there has already been way too much logging on the Island especially in delicate areas, and around the Karst area is not a good place to be cutting any part of the forest lands.	
Santiago of Southeast Ak	I oppose more old growth logging on Prince of Wales Island. I think if you guys want to do any type of logging, you should ask the public where and what is acceptable. So please do not cut the El Capitan forest.	
Elsa Sebastian	I'm writing to oppose the current plan to offer the El Capitan timber sale.	
June Yamrick	Not in favor of harvesting timber in Southeast Alaska.	

Commenter	Comment	Response
Jon and Brenda Gaedke	Not in favor of harvesting timber in Southeast Alaska.	
Doug Rhodes	Not in favor of harvesting timber in Southeast Alaska.	
Malena Martin	Not in favor of harvesting timber in Southeast Alaska.	
	Land Use Classification/ Planning	
Alaska Rainforest Defenders Pages 2,3,4	<p>The project’s use of public recreation and settlement lands for clearcutting is unlawful. Article VII, section 3 of the Alaska constitution reserves fish, wildlife and water resources “to the people for common use.” The Alaska Supreme Court interprets the provision to “impos[e] upon the state a public trust duty with regard to management of fish, wildlife and waters” and “guarantee broad public access to natural resources.” The public trust protects opportunities to hunt, fish and otherwise utilize public lands within its scope and requires a fair decision making process that preserves those opportunities. The public trust doctrine in part drove the development of the Prince of Wales Island Area Plan (POWIAP) which explicitly directed that management actions would be consistent with plan direction and the public trust doctrine. The POWIAP classified most of the area – that the DOF now proposes to clearcut – for non-timber purposes, such as recreation and scenery, that are encompassed within the public trust. A timber project of this scale is incompatible with those purposes.</p> <p>The Alaska Forest Resources and Practices Act directs forest managers to administer lands for multiple use “in the manner that best provides for the present needs and preserves the future options of the state. “Thus, “some land will be used for less than all of the resources,” after consideration of the relative values of various resources. This project violates this statute by converting multiple use lands to solely timber purposes.</p>	<p>Public trust doctrine applies to fish, wildlife and water. The trust doctrine is common law based. It has been affirmed in the state constitution and is typically associated with public access of a free flowing and renewable resources such as water, fish and wildlife. Fish and wildlife are held in trust for public use by the state until they are harvested. The state regulates these resources with that intent.</p> <p>The association of settlement, scenic and recreational values are not explicit with the trust doctrine</p> <p>While scenic values are associated with some user experiences, it is not feasible to have active forest management (timber harvest) without some visual influence.</p> <p>Similarly, access to public state land resources is precluded only where it is not in the public’s interest because of safety or need to the protect the resources. The harvest of timber does not restrict access to public land other than for short durations when active management is occurring.</p> <p>The dual classification in this case (Settlement and Recreation) of most of the land in this decision indicates the preferred uses but not the only allowed. Settlement lands are not multiple use lands in the sense that they must provide room for all types of use; they have been classified as appropriate for disposal to the public and by that eventual action will preclude some types of use as they will no longer be under State management. Other use is considered reasonable if it does not preclude the</p>

Commenter	Comment	Response
		primary classification intent. The harvest of timber does not prevent settlement or recreation from occurring, on the contrary it likely makes it feasible due to increased access and removal of obstacles to development such as access and the timber.
Alaska Rainforest Defenders Pages 2,3,4	The PBIF does not explain how or why the proposal to implement a large clearcutting project is consistent with what appears to be a very limited exception that would allow low-impact logging in areas with this land classification. There is no detail in the PBIF indicating plans or a need for such a large subdivision in the area.	The language cited from the POWIAP refers to the intent to accommodate existing settlement use. In this case there is not and existing adjacent Settlement use. Roads are relatively expensive to develop. The area of the timber sale was identified for settlement planning for several decades. The recent subdivision (Alaska State Land Offering-Auction #493 referenced in the PBIF is the product of a long-standing program facilitated by the DMLW to make state land available for private ownership. The DMLW has asked the DOF to consider and coordinate timber harvest on settlement lands. It has been their observation that timber sales generically improve access and development potential of an area.
SEACC Page 5	The sale is contradictory to both of those management plans and the Alaska Constitution regarding sustainability and multiple use mandates. The statements in the PBIF that assert that the sale is in keeping with those management policies are inaccurate and skewed in favor of shaky timber economics rather than sustained yield, multiple use, and best management practices.	Comment noted, no change required.
Alaska Rainforest Defenders Pages 3 and 4	The public was not adequately noticed through an area planning process for this type of activity on public land designated in the plan for other uses. “the 2021-2025 FYSTS did not provide adequate notice of DOF plans to clearcut areas designated for Settlement and Recreation.”	The DOF provided public notice in the 2021-2025 FYSTS for a timber sale on several different delineated land classifications in the El Capitan area. Specific timber polygons were shown along with proposed road routes. These sale attributes were identified (mapped) and scoped for possible units by contract and state foresters. The description on Page 13 of the FYSTS outlined the work that had been performed and the intent to incorporate the unit pool into a proposed sale of

Commenter	Comment	Response
		approximately 12,000 MBF (FYSTS, Table 1).
SEACC Page 6	The PBIF states that there are some Settlement lands which are likely “not suitable” for a subdivision because of terrain or streams, but appears nonetheless to include logging those lands in this sale plan. If the land classified as Settlement is not feasible to develop, then no logging should occur, since that activity would not be in support of settlement development. SEACC requests that units in Settlement lands which have been found to be unfeasible to develop be omitted from the sale.	The allocation of land is based on the state constitutional objectives to make the land and resources available to the citizens of the state. As more information is gathered, the appropriateness of the varying uses becomes more apparent. In the case of the settlement, feasibility of access and the facility development generally govern where people build. The DOF PBIF statement referenced reflects high level economic feasibility that is not likely to change. The harvest of timber overall will not preclude the primary use of the area for settlement. The scale of this timber development was intended to reflect the contemporary demand for timber, cover the mobilization costs to the area, all the while supporting to the extent practical the development and improvement of access to the settlement classified area.
SEACC Page 7	While the building of roads may indeed be a cost associated with building a subdivision, it is impossible to link a timber sale to a future subdivision if there are no current plans for the subdivision design, meaning that the timber sale roads would not be developed with subdivision design methods in mind, but merely for the easiest extraction of timber. That may not mean that the roads will actually meet the needs of subdivision design at the time the area is thus developed, putting into question how helpful this timber sale can be to the future goal of developing a subdivision of residential property. If there are existing and specific plans for developing this area, SEACC requests that the state make them public.	Terrain and land configuration, largely influence subdivision design in Southeast Alaska. View lots and water frontage dominate land sale demand in remote areas especially so if infrastructure such as utilities and roads are not present. The roads were located with respect to the same large feature classes that would constrain the placement of a subdivision road. Access to terrain to enable shovel logging similarly provides proximity to the lower sloped landforms conducive to settlement and constructing structures (homes). From this initial access, additional roads and refinements will likely be added in the future once the lots are partitioned.
SEACC Page 7	The state is mis-characterizing this logging plan as “in support of the costs or design of subdivision activity” while ignoring the other resources important to the area if it is developed.	Comment noted, no change required.
	Sustained Yield and Annual Allowable Cut	
Alaska Rainforest	The use of Recreation and Settlement land classification is	The DOF is using public land and resources in the

Commenter	Comment	Response
Defenders Pages 2,3,4	an attempt to avoid the constraints of the annual allowable cut restrictions.	southeast area that it has identified as eligible to meet a demand. The DOF typically sells less than its annual allowable cut on lands identified as requiring a sustainable harvest.
SEACC Page 5	The state has not demonstrated how it will avoid exceeding the AAC threshold when this sale is combined with the other sales on the Five Year Schedule of Timber Sales.	The agency has undercut on a decadal basis since it started tracking harvest volume in 1996. On average the agency has cut on a yearly basis 6,738 MBF a year or (60%) of its AAC. This sale has approximately 76 acres on GU or SESF land qualifying for constraint by the AAC. This is 23% the published AAC derived from the average yearly acreage of 332 acres for the Southeast Area. The DOF reports cut volume to the legislature and publishes a report on a yearly basis. Reports are available on our website or by request.
SEACC Page 5	How is the 10-year period established?	<p>The growth rate at the end of a stand's rotation age conservatively supports the decadal limit approach relative to the merchantable volume available on the land management base. It is generally acknowledged but dependent on several factors, that stands are feasible to harvest prior to obtaining the mean annual increment of growth. Depending on economic and cultural conditions, this timeframe of the likely succeeding harvest date spans a period of at least ten years.</p> <p>The span of decade is a common period of analysis. The time frame has been used historically by DOF and other forest managers (I.E. British Columbia Ministry of Forests). Ten years is a prudent management interval to regulate timber harvest as well when it is observed within the time window that natural regeneration takes to establish itself on most sites after harvest. The Alaska standard is defined in the Alaska Forest Practices Act (typically it occurs in less than 7 years in this region).</p>
SEACC Page 6	-leaving the majority of the acreage and board feet on Settlement/Recreation land, which the state asserts that it does not have to manage for Sustained Yield because the	Article VIII—5. Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the

Commenter	Comment	Response
	<p>state’s primary focus for those lands is “eventual disposal and divestiture from State ownership.” The eventuality of this land becoming private does not relieve the State of the responsibility to manage it according to Constitutional mandates for sustained yield while it owns the land. The Constitution requires all forest and other renewable resources to be managed under a sustained yield principle. It does not include any exemptions.</p>	<p>sustained yield principle, subject to preferences among beneficial uses.</p> <p>AS 38.05.300. “The commissioner shall classify for surface use land in areas considered necessary and proper. This section does not preclude reclassification where.., nor does it preclude multiple use purpose use of land whenever different uses are compatible.”</p> <p>Land classified (by the commissioner) as Settlement is associated with a use preference of settlement. Disposal of land is inherently not sustainable. The timber resource is associated with the land as it does not move in a manner like fish, wildlife or water. Therefore, the timber harvest associate with that land (Settlement) is likewise not reasonably regulated in a sustainable manner.</p>
<p>Steve Lewis Glacier Grotto of the National Speleological Society Page 1</p>	<p>The analysis of sustainability in the PBIF fails to consider in a meaningful way, the impacts of past harvest and road building and the cumulative impacts that these have along with potential impacts from the current proposal. A quick look at recent aerial photos would suggest to me that something in the neighborhood of 90% or more of the productive forest in the vicinity of this sale has already been harvested. That makes potential impacts of this sale to the entire ecosystem far greater than if this were the first harvest in the area.</p>	<p>The DOF chose to avoid the productive old growth along the anadromous stream 105-42-10110. This habitat was recognized as important for the purposes of wildlife and fisheries. The ADFG was consulted on the importance of the habitat and confirmed that the proposed harvest would have impacts on wildlife habitat but it was determined to not be significant given the adjoining habitat capacity of adjacent timber land.</p>
	Timber/ Silviculture	
<p>Elsa Sebastian Page 3</p>	<p>If the State is concerned with propagating forests that are of value to the timber industry, then you'd see the slow growth in diminished light as being a good strategy for promoting valuable timber. The get-rich quick, and future generations be-damned mentality of the State’s forestry practices are ultimately not a benefit to the resiliency and wealth of Prince of Wales.</p>	<p>It is our experience that the timber variability constrains the feasible options of a multi-entry or multi-aged management approach. The reality of operating harvest machinery at scale in old growth conditions creates a hazard to the logger and exposes the residual stand to damage. The ability to implement a multi-age forest management paradigm on Southeast Alaska terrain is more than a financial challenge though. The wind</p>

Commenter	Comment	Response
		<p>firmness of residual timber is a reoccurring risk observation. The thin soils or the more pointed observation that trees in Southeast grow with shallow root systems because of the water table, make the timber susceptible to wind through when openings are created naturally or on purpose.</p> <p>The other aspect is the required time frame for multi age management relative to the available lands base does not facilitate an extended rotation period well.</p> <p>Suppressed timber in an existing stand does not release reliably or consistently.</p> <p>World markets are also trending away from the high value products we have traditionally produced in these old growth stands. Facilities capable of feasibly handling the larger trees have greatly diminished in number in favor of the high production sawmills focused on uniform piece sizes. This has led to a long-term forest management perspective focused on producing discrete log characteristics (diameter, length, etc.) better achieved with even age management.</p>
Elsa Sebastian Page 3	The State has a responsibility to manage this forest for multiple use, and since partial cut serves that purpose it should be the basis for your plan.	The State has allocated land by use (classification) to achieve multiple use intent. Further, classification indicates preferred use but does not restrict the land for other uses provided the identified use is not unduly diminished by the ancillary use.
Elsa Sebastian Page 3	The emphasis for the Department of Forestry on Prince of Wales Island should rely less on timber production and more on other uses and benefits of the forest that could improve forest ecosystem health and contribute to a diverse economy.	The dominate landowner is the USFS, they have renewed their focus on other forest values than timber. The DNR and more specifically the DOF is a relatively small land manager in Southeast Alaska. The legislature and the executive have focused DOF's efforts on the management of the SESF and the other limited land to provide timber resources.
Zach LaPerriere	The statement within the State's decision that natural regeneration will begin almost immediately after harvest	Reforestation is predicted based on experience. Most Southeast sites regenerate to FRPA standards which are

Commenter	Comment	Response
	<p>may also be in error. Almost without a doubt, the large red cedar that would make the sale profitable are directly on top of very well drained limestone. As you may or may not know, a large percentage of big timber that was logged on Prince of Wales with karst underneath has not and will not ever regenerate. The thin soils often wash underground soon after clearcutting, leaving bare rock that no seedlings can grow on. Furthermore, without an adequate scientific understanding, it is likely that logging slash could plug drainage that is currently subsurface, causing new creeks and/or small rivers on the surface that will cause significant erosion and further problems with forest regeneration.</p>	<p>peer reviewed. While red cedar does grow proximate to well drained sites it is generally out competed by the hemlock and spruce on well drained sites. We have found the larger red cedar on the edges of the well-drained areas as they transition to poorly drained areas. Typically, we witness this down gradient of the karst feature you have focused on as controlling the productive site conditions. Red cedar is found in Southeast predominately on poorly drained and nutrient deficient sites. We have generally observed that reforestation is a non-issue based on the robust young growth occupying the 30–50-year-old cuts in the area. Your point that soils are thin and potentially mobile on karst is noted. The DOF implements best management practices to control nonpoint pollution in logging operations regardless of the underlying strata’s fragility to minimize soil movement and ultimately maintain forest conditions needed for sustainable forestry.</p>
Brandy Ward	<p>As a Alaska resident I would like to see the El Capitan area protected and not cut down for timber. Once a forest is cut down it never comes back. Trees can grow but the forest floor is destroyed. This area is important to the black tail deer as a critical winter habitat. It’s also a opportunity to expand regenerative tourism as a popular recreation site in Prince of Wales. As a Alaska State Forester I ask you to protect our forests. Keep our state wild and protected. We don’t have to cut trees down to boost an economy we need to leave them standing to boost our economy and keep our states soul. We are better than the lower 48. Let’s protect what we have and not give it away.</p>	<p>Comment noted, no change required.</p>
Thomas Wood	<p>I oppose the proposed El Capitan timber sale. North POW has too much dog’s hair second growth and too little old growth remaining. The El Capitan Tuxekan waterway is already excessively impacted by industrial timber harvest.</p> <p>Industrial logging in the Tongass has shown that the time to forest healing is too long in this climate zone and adversely</p>	<p>Comment noted, no change required.</p>

Commenter	Comment	Response
	impacts the other uses of the Tongass which are the future of the region's economy.	
Tom Boutin	Without having further information about this proposed timber sale I still can comment favorably so far as the silviculture.	Comment noted, no change required.
Doug Rhodes	This is a state forest- not a state clearcut! I understand that some logging will occur, but please choose some smaller units instead of devastating large swaths of land.	Comment noted, no change required.
SEACC Page 5	A patch-cutting system is also recommended, both in the harvest unit layout section and in the recreation and scenic values discussion of the POWIAP. However, in the PBIF, clearcut logging is the only method of harvest unit design discussed.	A patch cut is defined in most applications as small openings of less than 2-3 tree lengths in width interspersed with uncut areas. A true "patch cutting" system is generally not used in Southeast Alaska due to wind firmness concerns at most sites. Openings of this size also hinder the desirable shade intolerant species such as Sitka spruce. Operability of machinery generally becomes more difficult, hazardous, and costly. In this case economic feasibility indicated larger openings were desirable (more timber per mile of road) to recover the cost of the roads, the logging systems, and the high mobilization costs to the northern part of the island.
	Roads	
SEAC Page 4	Yet the DOF is silent on exactly how many miles of new road will be built with the El Capitan sale, what measures the agency proposes to take to minimize construction of additional roads, and what it will do to mitigate the impacts of the roads that are created, especially in sensitive karst systems.	The DOF was graphically explicit on the maps provided in the PBIF. Total distance of road portrayed on the maps is approximately 4.5 miles. The PBIF was clear that road distance is minimized as it can affect other resources and is a cost of operations that is inherently managed with the logging system to minimize overall cost. With resources such as surface waters or karst we have avoided them, then minimized exposure and will, if necessary, implement the best management practices outlined in the FRPA to mitigate impacts. If site specific measures are needed, they will be called out in the FLUP and applied using contemporary erosion and sediment control engineering and methods.

Commenter	Comment	Response
	Topography/ Soils/ Karst Resources	
All Form Emails	...will impact the karst lands (which serve as a network of underground, interconnecting fissures and cavities that transport nutrients throughout the old-growth forest) on the north end of the island. Generally speaking, Prince of Wales karst forestlands have already been over-harvested, with more than 75% of all karst forests already logged. Considering their profound ecological importance, I oppose additional old-growth logging on karst lands.	Comment noted, no change required.
Richard Monkman	Plus, as an old growth karst forest, this area is an invaluable, irreplaceable resource for all Alaskans.	Comment noted, no change required.
Steve Lewis Glacier Grotto of the National Speleological Society Page 2	The subsurface hydrology and caves found in Tongass karst have been found to be important and significant both nationally and world-wide. (Aley, Thomas, et. al. 1993. Karst and Cave Resource Significance Assessment Ketchikan Area, Tongass National Forest Alaska, A study and report prepared by the Ozark Underground Laboratory under contract to the Ketchikan Area, Tongass National Forest, 123 pp.) These landscapes have also already been heavily impacted by past logging operations. Over 75% of the Tongass karst lands have already been harvested and those remaining are thus much more valuable for the resources they provide as intact karst lands than for the timber on their surface. Any that are considered for harvest should require stringent regulation such as those required by the Tongass National Forest in their karst standards and guidelines.	Comment noted, we have reviewed the USFS material.
Steve Lewis Glacier Grotto of the National Speleological Society Page 4	While the state may not have legislation similar to the Federal Cave Protection Act, it does have constitutional requirements to manage resources in a sustainable manner and logging these lands knowing what we do about karst and timber harvest clearly does not come close to meeting best management practices. It is, therefore, likely, unconstitutional.	While karst resources may have unique values and contribute features to the landscape that are valuable, they are not inherently managed in a sustainable sense. The DOF recognizes the karst landform should be managed in a conservative manner with respect to hydrologic function.

Commenter	Comment	Response
Steve Lewis Glacier Grotto of the National Speleological Society Page 4	I urge planners at a minimum to read through federal guidelines for harvest and roadbuilding on karst lands in the Tongass and to follow the minimal requirements that research has provided to maintain a healthy ecosystem on these fragile landscapes.	Comment noted, we have reviewed the USFS material.
Steve Lewis Glacier Grotto of the National Speleological Society Page 2	<i>Mr. Lewis advocates that karst landforms because of their importance and uniqueness need to be categorically identified, inventoried, hydrologically delineated, and assessed for vulnerability using a system similar to the USFS methodology. He asserts the state has not done this to date.</i>	Comment noted, we have reviewed the USFS material.
Zach LaPerriere	I am writing to object to the El Capitan Timber Sale. At a bare minimum, the State of Alaska should have the sale area inventoried for caves and karst by either a trained geologist and/or some of the well-trained cavers who have done similar work in the past in Southeast as volunteers or paid staff of the US Forest Service. My main objection to this sale is that the State has not followed the science of understanding the cave and karst systems that most likely lie under the proposed sale. As you know, the entrance to one of the largest caves in the State of Alaska is very close to this sale, on USFS land. There is a very likely chance that similar cave systems are immediately underground of portions of the proposed sale.	Comment noted, we have reviewed the USFS material.
SEACC Page 9	Since this is the main opportunity for the public to provide comments on this proposed sale, site-specific information about karst resources should be presented. A legitimate study of the proposed sale areas pertinent to karst and caves should be conducted before logging takes place. All areas in the project area which were defined by the Forest Service as high vulnerability karst should be removed from the proposed sale.	Comment noted, we have reviewed the USFS material.
Steve Lewis Glacier Grotto of the	If common sense does not prevail, we will certainly take the time to access more detailed information on these areas and	Comment noted, no change required.

Commenter	Comment	Response
National Speleological Society Page 4	to do whatever it takes to see that good management practices and sensible conservation prevail.	
Steve Lewis Glacier Grotto of the National Speleological Society Page 4	To be effective, (<i>karst</i>) buffers need to be at least twice as wide as the average height of the tallest trees in the area.	Comment noted, no change required.
SEACC Page 9	Unit 4 in particular, as mapped, contains high-vulnerability karst and cave resources. The groundwater in this karst system likely feeds the nearby surface water bodies visible on the map, including the marked anadromous fish streams. Karst systems are extremely fragile and are easily damaged by heavy equipment, with significant risks of water quality impairment and contamination from leaking equipment and spills. Any silting, debris or industrial pollution can affect the whole aquifer. Further, the extensive road building required for this sale will cause considerable damage to the karst system.	Comment noted, no change required.
Steve Lewis Glacier Grotto of the National Speleological Society Page 4	I note that some of these units are proposed for future sale for people to subdivide and live on. While this may not be the best idea on karst lands, it is an even worse idea to damage the landscape and hydrology prior to such a sale. Not only will this make the lands less valuable in a future sale, it will increase potential for future damage to the karst. The state should have serious second thoughts about proposing human settlement on any but the least vulnerable of karst lands. From what I know about the development of the karst in this area, these lands are almost certainly moderately or even highly vulnerable and deserve significant or even complete protection from timber harvest and from human habitation. There is huge potential for contaminating the surface and especially subsurface hydrology with affects not only for the “offending” resident,	DMLW often tracts out areas for streams, recreation, public use, etc. The State often retains land in subdivision projects for one of these reasons. The adjacent El Capitan West Subdivision had several tracts reserved in this manner.

Commenter	Comment	Response
	but for all their neighbors and the wildlife that depends on clean water.	
	Wildlife	
Alaska Rainforest Defenders Pages 7,8,9	<p>The DOF has not taken a hard look at the cumulative impacts of the project.</p> <p>“The PBIF’s habitat impact analysis looks narrowly at the harvest units, which comprise a substantial portion of the 2,140 acre El Capitan Unit 4a.”</p> <p>Pending canopy closures (a consequence of past logging) are likely to result in significant population declines, with corresponding reductions in human access. These changes can cause non-linear predator-prey dynamics, causing declines in populations of wolves, black bears and deer.</p>	<p>ADFG was consulted in the planning process. Several analyses of the habitat conditions were undertaken. Focus of the habitat assessment was proximate to the road system. ADFG determined that the proposed retention of habitat in the timber sale area was sufficient.</p>
SEACC Page 6	<p>The Prince of Wales Island management plan also states that cumulative benefits of forest-wide protections in the Tongass Land Resource Management Plan (TLMP) should be considered in determining harvest area design, such as leave areas and wildlife travel corridors. No such consideration or reference is evident in the PBIF.</p>	<p>No species of concern were noted by ADFG. ADFG assessment of state land considering the TLMP actions on federal land was that the leave areas were sufficient for wildlife habitat. The DOF respected the anadromous stream corridor associated with stream 105-42-10110. A corridor in excess of 300 feet either side of the stream was retained. The corridor provides significant wildlife cover and continuity in the area. Existing trails are evident for deer, wolf, and bear. The reserved corridors are in keeping with the those recommended by the area plan.</p>
SEACC Page 2	<p>For the harvests proposed on north Prince of Wales, the DOF should acknowledge that the contiguous high-volume old-growth forest in this area has already been reduced through logging and development by 93.8% between 1954 and 2004. From a forest management standpoint, it is irresponsible for the DOF to fail to consider the impacts of continued removal of remaining high volume stands on state land within the larger context of and in conjunction with logging that is occurring on adjacent land holdings. When</p>	

Commenter	Comment	Response
	<p>offering a timber sale that is adjacent to areas harvested by other landowners, the DOF should consider how the cumulative effect of these individual sales and any roads yet to be constructed will further combine to reduce remaining old-growth habitat, with effects that include eliminating winter habitat for deer or wildlife corridors for bears. When a state agency disposes of land, resources, or an interest in land or resources, the agency must consider the cumulative impacts of the project to determine whether the project is in the public interest. (1)</p>	
<p>Alaska Rainforest Defenders Page 10</p>	<p>In light of the now limited amount of old-growth across the landscape, there is a heightened need to protect areas with potential den, sites given the specific habitat features provided by the old-growth.</p>	<p>ADFG stated that dens were not identified in the sale area. The DOF did not observe dens in the sale area.</p>
<p>Alaska Rainforest Defenders Page 10</p>	<p>Finally, several of the sale’s units occur within beach fringe areas. Scientific experts on southeast Alaska wildlife ecology assert that, per acre, the beach fringe is one of the “two most important habitats for sustaining wildlife populations [in southeast Alaska], and are also hotspots for biodiversity,” and are important for habitat connectivity.</p>	<p>The DOF agrees that the value of beach or streams retention areas is higher as a whole than other landforms for habitat values. That does not necessarily preclude the beach fringe being used for other uses when timber, topography and identified preferred use indicates eventual and active use such as settlement activity. The strip of timber below the 200000 Road and south of Units 1 and 2, was retained for habitat and other values identified by DNR.</p> <p>The long-term objective of DNR has been to identify and where feasible to provide where appropriate, usable upland access to the identified future settlement areas. Typical high demand lots are beach frontage and view lots. The proposed harvest of the timber adjacent to the beach in Unit 5 between the proposed road and the beach is likely susceptible to wind through action if left in place after installing a road as proposed. The DOF assessment of the area was that a significant amount of timber would also be disturbed from the eventual use or removal by developers of the area lots. Lastly, the added timber revenue of the area was considered significant for the economic development of the of the road within the</p>

Commenter	Comment	Response
		timber sale's resources.
All Form Emails	20% of this sale is critical winter habitat for Sitka Black Tail Deer. As you know, deer are a critical subsistence resource across Southeast Alaska, and I believe this sale will have a substantial local impact on deer harvest. Cancelling the sale or breaking it into smaller pieces would be a better decision for deer and for the people who rely on them.	The ADFG did not characterize the habitat documented in the timber sale units as "critical". Per ADFG review of the PBIF: "Due to the remaining important habitat in between the timber sale units, ADF&G does not have major concerns for impacts on deer populations or the predator populations that rely on deer."
SEACC Page 3	There is an apparent typo in the section which states: "POW has a total area of approximately 2,577 square miles. The amount of land harvested by the Whale Pass timber sale is small in comparison to the size of POW (0.02%)." We believe "Whale Pass" should be replaced by "El Capitan." The state should include volume and acreage for all its lands on POW in order to make such a size comparison.	Thank you for catching the typographic error. The error has been corrected in the decision document.
SEACC Page 2	For the harvests proposed on north Prince of Wales, the DOF should acknowledge that the contiguous high-volume old-growth forest in this area has already been reduced through logging and development by 93.8% between 1954 and 2004. From a forest management standpoint, it is irresponsible for the DOF to fail to consider the impacts of continued removal of remaining high volume stands on state land within the larger context of and in conjunction with logging that is occurring on adjacent land holdings. When offering a timber sale that is adjacent to areas harvested by other landowners, the DOF should consider how the cumulative effect of these individual sales and any roads yet to be constructed will further combine to reduce remaining old-growth habitat, with effects that include eliminating winter habitat for deer or wildlife corridors for bears. When a state agency disposes of land, resources, or an interest in land or resources, the agency must consider the cumulative impacts of the project to determine whether the project is in the public interest. (1)	<p>The DOF received input from ADFG Division of Wildlife Conservation and the Division of Habitat on these subjects. The DOF relies on their professional judgement as the basis of the analysis applied to the best interest finding.</p> <p>"The timber sale units have important wintering deer habitat. Removing important winter deer habitat (i.e. clearcutting these stands), may negatively impact local Sitka black-tailed deer populations. Nearby habitat has been degraded by the historic logging legacy in Game Management Unit (GMU) 2, and additional cuts will be additive. However, these timber sale units are relatively small and important wintering deer habitat will be retained in-between the proposed cuts. Although local wildlife populations will be negatively impacted by the removal of habitat, DWC expects the overall impact of this timber sale on the entire GMU 2 wildlife populations to be minimal. As stated in our original comments, there</p>

Commenter	Comment	Response
SEACC Page 3	However, the PBIF barely addresses wildlife concerns and includes no scientific basis for its conclusions about deer habitat, wolf and bear use of the area, or potential impacts.	<p>are no known bear or wolf dens in the area.”</p> <p>Both agencies concur with and submitted the concluding statement, “The PBIF appears to meet the intent of the Prince of Wales Island Area Plan, and the Forest Resources and Practices Statutes and Regulations.” (ADFG, February 2023)</p>
SEACC Page 4	The state has not detailed what scientific methods it has used to conclude that the deer habitat or the wolf habitat is of “nominal” importance.	
SEACC Page 4	<p>While it appears that the DNR has consulted with the Alaska Department of Fish and Game (ADF&G), the stated lack of concern on the part of that agency does not alleviate the responsibility of the state DNR to assess the nature of the sale area in terms of habitat for all species. The collared deer in the area indicated to ADF&G that 20% of the proposed sale area is an “important seasonal habitat” for deer. The state excuses its intent to remove this important habitat by referencing other habitats between the sales. Using this justification, every development or timber sale activity can be sanctioned by simply stating that there are more trees elsewhere. In reality, the landscape around the sale areas has already been heavily fragmented by previous logging, or will soon be, considering state ownership in the area.</p> <p>Any and all remaining habitat in this area is critical. The state should omit the old growth from this sale, or at a minimum omit the 20% that has been acknowledged by ADF&G as important seasonal habitat.</p>	
Elsa Sebastian Page 3	If 20% of this sale offers deer habitat, that should be left intact or harvested selectively as part of a partial cut plan.	
SEACC Page 4	How much hunting and trapping occurs in the area? No mention of Wildlife Analysis Areas (WAA) is made in the PBIF. These are the units used to study hunting and trapping reports, populations of species, and other important factors. We request that the state include hunting statistics by WAA for the sale area for at least the past 10 years.	
		<p>Deer harvest and trapping occur within this area. Hunters are required to report the location of their deer harvest to DWC. DWC can share deer harvest information at the Wildlife Analysis Area (WAA) level. These timber sale units are in 2 WAAs, WAA 1527 (179 km²) and WAA 1530 (257 km²). A relatively low proportion of the unit wide deer harvest occurs within</p>

Commenter	Comment	Response
		<p>these two WAAs. During regulatory years 2012-2021, on average 19 hunters annually harvested 17 deer in WAA 1527 and 125 hunters annually harvested 143 deer in WAA 1530. On average, 160 hunters annually harvest deer within these two WAAs. Although trappers report location of furbearer harvest, this data is not coded to specific WAAs. Clearcut logging these units may have a short-term (5-7 years) positive impact on the hunters and trappers who use the immediate area but will likely cause a long-term decline in hunting opportunity in this location. (ADFG, February 2023)</p>
<p>Elsa Sebastian Page 2 and 3</p>	<p>Another issue with this sale is that although the need for precommercial thinning is “anticipated”, the costs of the sale - “administration, access, and operating”- do not take into consideration the eventual costs of precommercial thinning. If the timber sale itself doesn’t cover this cost, then we are simply kicking the can down the road, and future Alaskans will have to cover the costs of reclaiming this site through thinning. This thinning is not just necessary for commercial reasons, but it’s also necessary to ensure that the clearcut lands have some habitat value within the next 100 years.</p>	<p>The DOF agrees that precommercial thinning generally adds potential to timber stands in Southeast Alaska. On some sites it can also provide improvement for wildlife habitat over not thinning. It would be premature and outside of our authority for the DOF to commit to the economic and management priorities of the state during the window of time (approximately 30 years from now) that thinning would be silviculturally appropriate. The DOF pursued grants associated with the economic recovery funding in late 2011 to thin approximately 1,400 acres on GU lands that had been harvested by the USFS prior to ownership transfer to the state. The DOF regularly conducts silvicultural improvements in other parts of the state (planting, site preparation, prescribed burning, etc.). It would be our intent to apply a variety of funding streams to regenerating stands identified by ADFG and DOF that could benefit from thinning for economic return or wildlife values. The DOF is currently entering a period of opportunity that will last for several decades for thinning areas it harvested in Southeast Alaska starting in the late 1990’s.</p>
<p>Steve Lewis Glacier Grotto of the</p>	<p>Furthermore, as someone who has radio tagged bats for PhD research in this area, I can let you know that Twin Island Lake is a very important site for bat foraging, as is Turn</p>	<p>The DOF has allowed snags to be left in harvest units if they are not a hazard to operations. The DOF has received guidance on the importance of this subject from</p>

Commenter	Comment	Response
National Speleological Society Page 2	Creek. And, it should also be noted that large old growth snags are a critical part of good bat habitat since they are generally the best sites for maternity roosts, providing protection under the bark or in cavities, while soaking up heat from solar gain that is essential to quick development of the pups. An unavoidable part of clear cutting is destroying all these critical snags.	ADFG: “clearcut logging may be detrimental to local bat populations. DWC recommends retaining snags for bat habitat and preserving any maternity roosts or hibernacula that are found on site.” (ADFG, February 2023) Where feasible within the requirements of safe operations the State will specify that snags are to be left in the units.
Ralph Wells	We recently traveled by boat along the west coast of POW, and found it to be unusually sterile with regard to wildlife compared to all other islands we have visited. I attribute this to the ubiquitous clear cuts from the past.	Comment noted, no change required.
Jackson Mathew	Your own documents state that about 20% of the sale is actually critical winter habit for deer, ADFG has stated that overwintering habitat and old growth are limiting factors for deer population on POW, that reliance on deer on POW is high, but that the populations are in decline. So it is very reasonable to oppose this sale simply from a sustained yield of deer perspective. The best thing for deer and for deer hunters would be to keep these trees as deer habitat.	The habitat referenced was described as important. Comment noted, no change required.
Denis Ransy	Most of the northern part of the island has been logged intensively for decades. It literally has been cut to pieces. Now we need to concentrate on restoration and protection of water quality, fish and wildlife habitat, scenic quality for tourism, and small timber harvests for local builders and crafts people. You claim that logging is good for grazing and browsing wildlife. But in heavy snow years, deep snow build-up in clear cuts hinders animal movement, removes protective tree cover and buries available grass and browse.	Comment noted, no change required.

Commenter	Comment	Response
Becky Long	<p>The proposed sale is many different pieces. This will result in even more fragmented habitat for deer. Deer habitat is trying to recover from past logging. Deer is an important food source not just for the Prince of Wales residents but nearby areas such as Ketchikan.</p> <p>This area should be protected and not logged. This is an important ecologically valuable karst forest lands.</p>	The DOF maintained significant corridor beyond the statutory requirements of AS 41.17 in recognition of the relative importance of the area adjacent to 105-42-10110 for travel of wildlife in the immediate area. The DOF also tied this area into the area adjacent to the 2000 Road south of Units 1-3 for visual, habitat and cultural reasons.
Doug Robbins	<p>Biologist John Schoen, a personal friend, spent a career studying the Tongass Forest. John wrote technical papers, (Albert and Schoen, 2013, Use of Historical Logging Patterns to Identify Disproportionately Logged Ecosystems within Temperate Rainforests of Southeastern Alaska) and a personal and technical memoir (Tongass Odyssey, 2020) describing issues with clear-cut logging in the Tongass. Large-tree, old-growth, and low elevation areas are the most valuable for loggers, and also the most productive and valuable eco-systems of the Tongass. The proposed timber sale is of a increasingly sparse and over-exploited natural resource, critical for Sitka deer, bears, and as a watershed for salmon. We've reached the limit of what we should responsibly cut in a few generations, because full recovery of the forest takes about 300 years.</p>	Comment noted, no change required.
	Subsistence Hunting	
Richard Monkman	This is a critical habitat for deer and the proposed sale will adversely affect the Slovak subsistence users.	Comment noted, no change required.
Michael Kampnich	Unit II/Prince of Wales Island is facing a serious decline in our deer population and the opportunity to harvest deer by the residents here. This is due in large part to a precipitous loss of Old Growth Forest habitat which is necessary to support a healthy deer population. Because so much of the present young growth forest habitat is in or moving into stem exclusion, the ability to support a robust deer population here, has been significantly diminished. The	Comment noted, no change required.

Commenter	Comment	Response
	State has a responsibility to consider all values associated with healthy forests that support our fish and wildlife. With the loss of hundreds of thousands of acres of OG forests in Unit II and specifically on Prince of Wales Island, every acre of OG timber is vitally important for deer, as well as fish and other wildlife.	
SEACC Page 4	How has the state determined that the area is not important for subsistence hunters? Again, stating that there are roads, old-growth forest, and deer “elsewhere on POW” is not sufficient.	The extent of the project area is characterized as small in comparison to the rest of wildlife management Unit 2 (POW Island). This project area is also relatively small in comparison to the two Wildlife Analysis Areas (1527 and 1530) that the ADF&G provided specific harvest information on. The reported deer harvested over the last ten years within these two areas contain 0.05% of the total deer harvested in Unit 2.
Malena Martin	You've designated 1/5 of the sale as Sitka Black Tail Deer critical winter habitat. A good way to keep subsistence game around is not to destroy where they live.	Comment noted, no change required.
Cheryl Fecko Page 1	My major concerns are over the negative impacts this and other proposed old growth clearcuts will have on deer, fish and other wildlife habitat. The subsistence activities that depend on these intact old growth habitats will only be diminished. The El Cap area has already been heavily impacted by previous logging over the decades, and the cumulative impacts of this sale adjacent to previously logged areas will create a huge area of degraded habitat, especially for deer.	Comment noted, no change required.
	Streams/ Fisheries	
Alaska Rainforest Defenders Pages 11-14	The DOF has not taken a hard look at the cumulative impact to fish resources because of past logging and climate change stressors.	The ADFG has not communicated that the fish habitat in the greater POW Island area has cumulatively been harmed in a manner that State timber management should categorically adjust adjacent to these streams. The DOF avoids impacting all fish habitat programmatically and manages potential nonpoint pollution impacts per the best management practices of the Alaska Forest Practices
Alaska Rainforest Defenders Pages 11-14	Logging reduces the regulating-service of forests that mitigates more severe and frequent floods, which wash away rearing habitat or suffocate salmon in the early stages	

Commenter	Comment	Response
	<p>of their life cycle with sediment. Even without considering climate change, clearcutting and timber road construction in salmon habitat reduce productivity for salmon in numerous ways. Sedimentation of stream beds is a principal cause of declining salmon populations throughout their range. Roads cause ongoing, chronic sediment delivery that goes downstream and degrades salmon spawning and rearing habitat.</p>	<p>Act and Regulations. The implementation of the program and its effectiveness is based on observations and science in Alaska and the lower 48.</p>
<p>Alaska Rainforest Defenders Pages 12</p>	<p>The potential for increases in landslide frequency caused by climate change threatens fish habitat. Logging and roads exacerbate these risks.</p>	
<p>Alaska Rainforest Defenders Pages 12</p>	<p>Sedimentation of stream beds is a principal cause of declining salmon populations throughout their range. Roads cause ongoing, chronic sediment delivery that goes downstream and degrades salmon spawning and rearing habitat. There is chronic sedimentation affecting fish habitat throughout the island because of clearcutting and timber road densities.</p>	
<p>Alaska Rainforest Defenders Pages 13</p>	<p>Adverse impacts to salmon are likely, even with other measures in place that attempt to mitigate habitat harms. In southeast Alaska the streamside buffers are narrow and tend to blow down, losing their effectiveness over time. And buffer requirements are minimal for most landowners and most stream sizes. Even where buffers do remain intact, they provide little protection against landslides caused by upslope logging or against road-caused sediment delivery. The absence of any requirement for buffers along non-anadromous smaller headwaters streams makes adjacent logging a significant source of sediment and downstream water quality degradation. Because logging and road construction cause high stream temperature in various ways, buffers alone do not prevent stream temperature increases. Some studies found stream temperature to be up to 7 to 11° warmer in logged areas.</p>	

Commenter	Comment	Response
Alaska Rainforest Defenders Page 14	A major habitat problem for Prince of Wales Island Alaska salmon is the number of stream miles blocked by failed culverts (“barrier” or “red” culverts). When less habitat is accessible to salmon for spawning and rearing and other life cycle needs, there can be a significant loss of population productivity, to the point of local extirpations. ⁹⁴	The DOF takes the blockage of drainage structures very seriously on State and private land. Road drainage structures are required to be actively managed for full functionality or be removed.
	Scenic Resources and Recreation	
All Form Emails	The area of this sale is adjacent to the El Capitan Passage on Prince of Wales Island. It will affect the scenic value of the landscape both along El Capitan Passage and along the Alaska Scenic Byway.	Comment noted, no change required.
SEAC Page 7	Users come to the area specifically to enjoy its scenic, remote recreation opportunities and subsistence use opportunities, all of which will be impacted for decades by the continued removal of old-growth forest parcels.	
SEAC Page 8	-this area is of particular interest to visitors to the POW area, who seek the north end due in large part to the fact that large old-growth trees are visible close to the road in many areas. -As the “highest and best” use of that area has been deemed recreation and scenic values in the POWIAP, the state should modify its harvest plan for this area so that the clearcuts cannot be seen from the waterbodies or from the main road.	
Elsa Sebastian Page 1	On page 10, you state that the El Capitan Passage receives “occasional” boat traffic from recreational and commercial vessels. I would argue this is probably the most heavily transited protected waterway in the POW Archipelago.	
Elsa Sebastian	-you describe the El Cap cave facilities as being in a “state of decline” and receiving “limited use”. Your language here	The state of the federal facility reflected observations of the area in the Summers of 2021 and 2022. The DOF

Commenter	Comment	Response
Page 2	<p>clearly serves to diminish and undermine the recreational value of this area. I would encourage your team to look at the use of this recreation site in terms of its value to the communities of Prince of Wales.</p> <p>-this timber sale is far too close to one of POW's recreational gems that will hopefully be revitalized by the US Forest Service's new commitments.</p>	<p>understands that the area has intrinsic value associated with its remote setting and the karst visitor area.</p>
Cheryl Fecko Page 2	<p>Another major concern includes the competing and conflicting interests between timber production and recreation for island residents and visitors to the north end of Prince of Wales Island. The USFS has plans to enhance and expand recreational opportunities near the El Capitan cave area, including a new trail to the cave and a cabin. Many people, myself included, use the old LTF site for camping. It's a great spot. This El Cap sale and the others to follow will make this a much less desirable place to visit. The state should address the value of the landscape for uses other than timber and subdivisions.</p>	<p>The log transfer and the roads in the area were constructed to support federal timber operations. While this type of federal forest use is in a state of flux, there will be a need to perform landscape level management on the Tongass on a variety of ownerships in the future. Active management of the area on all ownerships requires a similar infrastructure to be feasible. Without roads, most of the area would only be accessible from saltwater manner and be limited in practical accessibility by the public due to the time, effort and cost required.</p> <p>The DNR does not view the uses cited as exclusive in nature. Timber sale harvest while occurring can be dangerous and therefore displaces other activities; this is relatively short in term (several years at most). For the better part of a forest's rotation, the area is available for general use.</p>
Amanda Kiely	<p>The El Cap area is a very popular destination for tourists and locals alike and old growth logging here, as proposed in this timber sale, would hurt this area's potential to attract and serve the people who live and visit.</p> <p>This is a singular area on Prince of Wales, if not in all of Alaska. The karst here forms and supports a landscape unlike any other. El Cap Caves, El Cap Pass, camping, fishing, and hunting are just a few of the things people come to see and do in this area.</p> <p>There is so little old growth left on this island, we need to spare this area that benefits from a lot of human visitation.</p>	<p>Comment noted, no change required.</p>

Commenter	Comment	Response
	If we are to keep the Tongass a truly multi-use Forest, this timber sale needs to be reconsidered.	
Klayton Curtis	It would scar the land into an ugly wasteland for several generations.	Comments noted, no change required.
Klayton Curtis	The state would have greater economic benefit in the long term by protecting old growth forests and having less scarring of the forest which will attract the tourism dollars that will last for generations. The timber sale is a small amount of money that will soon be gone. A healthy and unscarred forest will attract more and more tourists as it is becoming more and more rare. POW is transitioning to a tourism economic base, as the logging industry fades. The responsible thing to do is to protect the new economic base for future generations instead of doing irreparable harm to the forests, and to our souls.	
Ralph Wells	More specifically, it will have a devastating effect on the scenic quality (think tourism) of the area. With the entrance to El Capitan cave being nearby, there are more people visiting this area than most rural areas of POW.	
Mathew Jackson	The cumulative impacts along that Alaska Scenic Byway are already very high. There is practically any old growth left to find right along the highway.	
Malena Marvin	You've also already published a management plan indicating the highest values for the area are scenery and recreation. Mature old-growth forest is hard to find these days in Alaska, and many of us would like to visit and enjoy what remains. Cutting down 340 acres along a designated Scenic Byway is shortsighted: this forest can keep on giving in the form of a recreational destination for the state for perpetuity. As a Southeast Alaskan, I prioritize industries that can peaceably coexist with others – clear cut old growth logging isn't one of those. It interrupts subsistence activity and it absolutely destroys our ability to draw independent tourists. I've been on the ferry and heard visitors gasp about our acres and acres of visible clearcuts. "Don't they want to	

Commenter	Comment	Response
	keep their forests?" Let's plan for the long haul for the people who live here, there's no future in industrial scale old growth logging in Alaska. Period.	
Mareth Griffith	<p>-El Capitan Cave is Alaska's only show cave, as well as home to some intriguing archaeological evidence of the co-existence of both black and brown bears on Prince of Wales Island in the past.</p> <p>-Because of the cave's archaeological significance, its status as a tourist attraction, and its proximity to a scenic byway, I would ask the State of Alaska to not offer this parcel up for logging.</p>	
Jackson Mathew	The sale is smack in the middle of some excellent karst lands, sandwiched between El Cap itself and Beaver Falls and several other recreational areas. As I'm sure you know more than 75% of karst lands have already been logged across Southeast Alaska.	
	Cultural and Historic Resources	
OHA	Our office believes that a finding of no adverse effect is appropriate under the condition that project activities stay within the proposed harvest areas and there are no improvements to the existing roads.	Comment noted, no change required.
	Climate Change	
Janet Angel	Do not log this area please! With climate change we need these trees.	It is the DOF's perspective that the management of forests, a part of which is their harvest and use, is appropriate regardless of the need to sequester carbon. While old growth timber has significant carbon in it, young growth timber generally sequesters carbon at a higher rate than old growth timber.
Tyler Henegan	The ecosystem within this area is ancient and rare and once logged will never return to its prior state. Beyond the natural beauty of this area is the reality that mankind is facing an unprecedented challenge posed by climate change. With many places throughout the world facing real problems due to climate change, is it really the time to log out some of the greatest carbon sinks?	

Commenter	Comment	Response
Ralph Wells	In general, removal of old-growth timber should be avoided due to its significant effect of carbon storage.	
	Timber Demand and Sale Economics	
Alaska Rainforest Defenders Page 15	The BIF should explain current state budget resources and whether state –across all relevant agencies – will be able to ensure both effective monitoring the effects of its timber program in general and this project in particular the project and infrastructure maintenance over the long term — as needed to avoid future impairment by today’s activities of land, water and fish resources and their productivity.	The governor and the legislature have consistently supported timber sale administration funding in Southeast Alaska. The implementation of the Alaska Forest Practices Act and Regulations is likewise supported in the current budgets of both the ADFG and the DOF.
Alaska Rainforest Defenders Page 16	Defenders requests that the DOF acquire and provide actual data relevant to whether a large timber sale is needed by “remaining mill facilities.”	The mills do not run without a timber supply. The USFS has made the decision to emphasize other values thus removing them as a significant timber source for the next 10 to 20 years or longer. Sealaska likewise has opted to manage their remaining land base for carbon credits and cultural efforts. The MHLT has holdings in the region that may provide timber for the next several years. Viking has repeatedly requested other State timber to provide product and operational flexibility to maintain existing markets. Small mill production appears to be adequately taken care of by the USFS efforts. Public outreach for the Bay View Timber Sale in 2020 returned a demand from small mills near Thorne Bay for local wood on POW island.
Alaska Rainforest Defenders Page 16	Does industry refer to logging or mill work?	It refers to both.
Alaska Rainforest Defenders Page 16	It is thus whether this project could achieve goals for local manufacturing employment is unclear, absent an evaluation of the amount of timber locally processed under the state’s program, and an evaluation of the relationship between front-loading the timber base for sale to larger timber operators now, versus preserving state resources for long-	This project is premised on applying timber resources commensurate to projected timber supply needs. Analysis of the specific timber indicated that a larger timber sale was generally necessary to cover mobilization costs and achieve the goal of land access.

Commenter	Comment	Response
	term small local mill jobs.	
<p>Alaska Rainforest Defenders</p> <p>Page 16</p>	<p>The BIF should also show data to supports its assumptions that there is a local logging workforce.</p>	<p>Operators in the timber industry are challenged to recruit and retain skilled labor locally. As with most industries this has been a governing factor to operating in the past several years. Feedback from operators indicates an aging and changing demographic in the woods and to a lesser extent the mill workforce. The use of skilled labor from the lower-48 has always been present in the industry and many other trades due to the semi-seasonal nature of the work in Alaska. Regardless there are local loggers and mill operators that have chosen the profession. Timber operations whether they are in old growth or young growth have transitioned to specialized mechanized methods of harvest with most of the workforce on heavy machinery. The wage rates for this style of work force compete against labor associated with public construction. Work in either of these arenas requires a longer-term workforce skill development in order to function with skill and reliably. The other factor influencing this topic is the high capital equipment costs; for financing to be feasible, certainty of work is desirable else financial risk is high which affects capital cost. Without contemporary machinery, operators are not able to reliably manage cost, timing and market availability of their wood. Maintaining a workforce is both a people and equipment problem that is feasibly managed better with predictability.</p>
<p>SEACC</p>	<p>According to the DOF, road building is an expense that is typically deducted from the purchase price of the timber, and the roads are built by the purchaser. This guarantees that only bigger operators like Viking Lumber Co. will successfully bid on any timber contracts that include road building as part of the sale. This scheme also tends to mask the true costs of timber extraction and the fact that, historically, the state's timber sale program has returned revenues of only about 10 cents for every dollar spent on</p>	<p>Road building is a cost that needs to occur up front to typically access timber. Road building is one of the larger costs and risks associated with timber removal in Southeast Alaska. The state could and has done some of this construction to manage risk or achieve specific outcomes. The DOF has limited capital resources for this effort. The transference of the risk to the purchaser is appropriate under most circumstances where the near term goal is focused on the timber. The management of</p>

Commenter	Comment	Response
	operating expenditures.	<p>the costs by the purchaser is more efficient than through government capital procurement methods.</p> <p>The state receives a capital asset at the completion of the timber sale in the form of the road. The road has value for future timber management and other activity (settlement).</p> <p>As a government agency we implement a variety of programs across the state through the use of legislatively authorized funding. The funds received from timber sales in Southeast Alaska are only a portion of our overall operating budget. Southeast timber generates a significant positive revenue that exceeds the preparation and administrative costs associated with the timber. This funding is used elsewhere in the state to facilitate resource management.</p>
Cheryl Fecko Page 2	It has been mentioned that the timber industry is struggling. In the last couple of years I have seen more red cedar and large old growth trees stacked outside Viking Lumber than I can remember. The logging truck traffic, sometimes seeing 6-8 different trucks making the run to the Naukati area and back tells me the timber industry is not suffering.	The movement of timber is fundamental to the industry and an indicator of the contemporary situation not the future. Commerce does not work well with irregular inputs of raw materials. This timber sale is an effort to provide material in a timely manner and as such reduce supply side risk.
Cheryl Fecko Page 2	This sale and other state proposed sales should be moving away from old growth logging not targeting it. I hope the state of Alaska moves towards smaller harvest units with extensive wildlife corridors that won't become logged in some future land selection or exchange.	The DNR does not have significant merchantable young growth in feasible quantities at this time. Smaller harvest units lead to the need for more land to deliver a similar amount of timber to market. This increases complexity and costs of operations. When necessary for other resource values, this perspective may be feasible to implement only if the timber has inherent financial value.
Cheryl Fecko Page 2	I can appreciate that this sale is requiring in-state manufacturing, thereby reducing round-log export and employing local people. It is the hope that additionally more of the timber will be made available to small operators.	Commented noted. We have had limited interest from local small operators in this area due the remote location and associated high transportation and mobilization costs.
Cheryl Fecko	I hope the Commissioner in making the final decision on this sale will move to reduce and eventually eliminate	This sale is all old growth timber, it contains significant stream and wildlife corridors. Beach timber was retained

Commenter	Comment	Response
Page 2	logging old growth, reduce harvest unit size and include retention of wildlife corridors along with larger stream, beach, and scenic buffers.	in most of the area for wildlife, cultural and scenic objectives.
Richard Monkman	-break it up into much small, ecologically sound, pieces.	Comment noted, no change required
Klayton Curtis	It is not necessary. Lumber and wood products can be obtained by using already established "tree farm" second growth tracts. The old growth, clear, tight grain wood is a high dollar luxury item for the ultra-wealthy. Those with money to burn benefit while the people who live here have to look at the destruction for generations.	Comment noted, no change required
Becky Long	I believe that the supposed timber demand for lumber is a hyped-up piece of data. Prove to the public that 8 million board feet of old growth is marketable. Just because the annual report to the Southeast Conference says that in 2021 there was a low level of timber jobs, that is not a good enough reason. There is more behind the low level of logging jobs than no state logging opportunities, which the annual report does point out. And the annual report says that the seafood industry was robust in 2021. This is probably mainly because there was a low level of timber jobs i.e. logging eliminates the habitat and water quality that the seafood industry depends on for a healthy resource.	<p>The DOF has sold every sale of this size class in Southeast that it has offered in the last 20 years. Preliminary appraisal of the sale indicates it is marketable.</p> <p>The low level of logging jobs in Southeast is a product of less overall logging occurring and changing methods used to log.</p> <p>Fish habitat is categorically avoided in timber sales. Actions adjacent to fish habitat minimize nonpoint pollution and mitigate unavoidable direct contact (road crossings, etc.) using proven best management practices to maintain water quality.</p>
Doug Robbins	In 2018, over 1,100,000 tourists took cruises along the Alaska panhandle. Tourists drop a lot of money in the state to see pristine wilderness. In the future, there will be ever-larger numbers of tourists, looking for Alaska forests in the Tongass. Even century-old clearcuts are not pristine, and will not have the wildlife that characterizes our old-growth forests. If we continue to cut forests, we are damaging a fully renewable resource - tourism dollars - for a one-time gain for very few people and very few dollars.	The DNR manages with the perspective that the two industries are not mutually exclusive. The size of southeast accommodates the two uses.
Tomas Boutin	I hope the end use will not be round log export but instead	Comment noted, no change required.

Commenter	Comment	Response
	<p>will include at least primary milling in Alaska.</p> <p>The Alaska economy consumes far above its weight from an economic input-output standpoint, and we produce far too little. Round log exports would exacerbate this economic imbalance.</p>	