

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



SOUTHEAST AREA

**BEST INTEREST FINDING FOR
WEST HOLLIS TIMBER SALE
SSE-1393-K**

August 2025

Abbreviations

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

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I. PROPOSED ACTION

The Division of Forestry and Fire Protection (DOF) is proposing to offer for sale approximately 146 acres of old growth and mature young growth timber composed of western redcedar, western hemlock, Sitka spruce and Alaska yellow cedar from state lands located 11 miles west of Hollis ferry terminal on Prince of Wales Island on the Klawock-Hollis Highway. The sale is in two locations, one by the Hydaburg Road junction and the other near the old waste pit at Mile 23.5, west of the Harris River Road. (see Appendix A, West Hollis Timber Sale Maps). The volume to be offered has been estimated to total approximately 3,100 thousand board feet (MBF).

The DOF proposes to sell the commercial timber in one or more negotiated sales under provisions of AS 38.05.118. Negotiated timber sale methods have been chosen because of the State's interest in encouraging employment on POW by processing as much of the timber locally as feasible.

The DOF has received interest in the timber from several mills, consequently the DOF will use its typical request for proposal process (RFP) to determine the specific purchaser(s) with whom to negotiate. The RFP process will consider the track record of the purchaser to locally manufacture wood products (AS 38.05.118), the proposed quantity of value-added wood products to be produced, the projected payroll associated with processing the sale, and the proposed stumpage rates. Selling the timber in an open and competitive manner using the AS 38.05.120 authority in Southeast Alaska would likely generate higher stumpage revenue to the State. Purchasers of competitive sales typically use the round log export market and obtain higher returns on their investment. A competitive sale using the AS 38.05.120 authority could not be constrained through contract language to use local mills as much as feasible.

The management objectives for the proposed timber sale are:

1. To follow the Alaska Department of Natural Resources' (ADNR) constitutional mandate to encourage the development of the State's renewable resources, making them available for maximum use consistent with the public interest.
2. To support the State's economy by providing royalties to the State in the form of stumpage receipts, and infuse the State's economy through wages, purchases, jobs, and business.
3. To contribute to the local economy of the communities within southern Southeast Alaska through jobs associated with road building, logging, trucking and potentially milling.
4. To harvest timber from future subdivision areas to promote economic development and to minimize infrastructure development costs in the area.

II. STATUTORY AND REGULATORY AUTHORITY

The Division is taking this action under the authority of

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

III. ADMINISTRATIVE RECORD

The Division will maintain an administrative record regarding the decision of whether or not to proceed with the action as proposed. This record will be maintained at the DOF's Southeast Area Office filed as SSE-1393-K.

IV. SCOPE OF DECISION

This Best Interest Finding (BIF) is part three of a six-part process to design, sell, and administer timber sales. This BIF covers the sale of approximately 79 acres of old growth forest and 67 acres of mature young growth. The proposed harvest is composed of western red cedar, western hemlock, Sitka spruce and Alaska yellow cedar on state land within the project area (see Appendix A, West Hollis Timber Sale Maps).

The following changes between the Preliminary BIF and Final BIF decisions have been made:

1. The harvest design intent was further developed to constrain unit location based on observed fish habitat.
2. The harvest design shall consider the specific habitat need (as identified by ADF&G) for travel corridors (with cover) to enable deer movement on the hillside from the upper elevations to the valley floor.
3. The wildlife section reflects previous work associated with the area planning.
4. The timber stands were further described.
5. The cost and benefits section was developed further.

The following list summarizes the overall land and forest planning process:

Part 1: Regional Planning. The Alaska 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 timber sales. Subsequent land use decisions must be consistent with provisions contained within the applicable area and/or forest plans. The project area in this BIF is covered by the Upper Twelvemile Arm Subunit 12a and the Hollis Subunit 12b of the Prince of Wales Island Area Plan (POWIAP). The Land Classification of the subunit is a mix of Settlement, Recreation, General Use, and Habitat Lands.

Part 2: Five-year Schedule of Timber Sales (AS 38.05.113). The Southern Southeast Area Office prepares a Five Year Schedule of Timber Sales (FYSTS) every other year. The Schedule identifies proposed sales, including their general location, approximate acreage and/or estimated timber volume, and main access routes. The FYSTS is a scoping document that provides, for each proposed timber sale, an opportunity for the public, agencies, and industry to identify potential issues and areas of interest for further consideration in the BIF process. Under AS 38.05.113, proposed timber sales within the area covered by a BIF must appear in at least one of the two FYSTSs preceding the sale. This timber sale area has been identified in the 2026-2030 FYSTS.

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

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

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

Part 5: Timber Sales and Contracts. Following final adoption of the BIF, the DOF may offer the timber for sale (negotiated or competitive bid) using the appropriate authority. The Division will sign a contract with the purchaser for each sale. The contract will include stipulations requiring compliance with the BIF, FLUP, and all applicable statutes and regulations.

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

V. PROJECT LOCATION, LAND STATUS, AND DESCRIPTION

A. Location

The timber sale area is found within Sections 7, 10, 11, 17 and 18, Township 74 South, Range 83 East, Copper River Meridian (CRM). The sale area is found within the Craig B-3 USGS quadrangle. See Appendix A, West Hollis Timber Sale Vicinity Map.

B. Title status

Patented to the state (Patent Numbers 50-2022-0011 and 50-96-0698) under National Forest Community Grants 242 and 360 respectively.

C. Land use planning, classification, and management intent

The land management intent for the area is generally described within the POWIAP (adopted 1985, updated 1998); specifically, the Upper Twelve Mile Arm (Subunit 12a) area and the west end of Hollis (Subunit 12b). The Twelve Mile Subunit 12a is classified Settlement Use. The west end of the Hollis Subunit 12b is classified Settlement and Remote Recreation; the east end of the unit contains a variety of classifications with the notable reservation of the Harris River estuary for habitat. The proposed timber sale units are all within the Settlement classified land. The DMLW is the land manager for all lands in this timber sale planning area. The DOF is the forest resource manager for all State land contained in the timber sale. The resource decisions in the area are guided by Chapter 2 with specific land management planning notes for the areas as follows (excerpted as applicable from the POWIAP Chapter 3):

Twelve Mile Subunit 12a

Harris River Junction. This selection was made in 1983 for community development and recreation, and occupies a site of a major road junction approximately 10 miles from Hollis, 14 miles from Klawock, and 20 miles from Hydaburg.

Hollis Subunit 12b

Fish and Wildlife

Most of the uplands adjacent to the creeks and the Harris River are important for community hunting, trapping, and berry picking. Waterfowl, deer, and bear hunting occur along the Harris

River and its estuary. These activities on the uplands are not designated for intensive harvest because they do not meet the criteria for intensive harvest.

Type of Habitat or Harvest	Place	Habitat or Harvest Values
Crucial Habitat (Ha)	All “Ha” in Subunit, including Harris River, Indian Creek, Maybeso Creek, Halfmile Creek	Seasonal waterfowl concentrations, seasonal black bear concentrations, salmon spawning, rearing and schooling
	5 anadromous fish streams	Salmon rearing and schooling
Intensive Community Use (Cy) by Hollis	Tidelands and submerged submerged lands	Waterfowl, deer, and bear hunting; fish, clams, crab
	Uplands (not designated) especially near Harris River, Indian Creek, Maybeso Creek, Halfmile Creek	Waterfowl, deer and bear hunting; fish, berries, trapping
Intensive Sport Harvest (Sf)	Harris River and estuary	Fish, waterfowl, black bear, deer

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. Development activities should have minimum impact on fish and wildlife habitat and harvest adjacent to Maybeso Creek, Halfmile Creek, Indian Creek, and the Harris River.

Guidelines:

A buffer with a minimum width of 300 feet, measured from the ordinary high-water mark on either side of the Harris River and Indian Creek, will be retained in public ownership. Activities that cause a negative impact on riparian habitat or fish and wildlife harvest will not be allowed within the buffer except to implement other provisions of this plan.

Forestry

Resource Information:

Areas with commercial grade forest are located throughout the subunit. Areas of previous timber harvest occur on the uplands along the Klawock-Hollis Highway as well as near the community center and school in Section 33.

Management Intent:

Timber harvests in areas designated “S” (Settlement) are also appropriate if in direct support of subdivision design and development.

D. Current access and land use

The sale area is located west of the community of Hollis on Prince of Wales Island. The access to the area is via the POW road system, specifically the Klawock Hollis Highway.

The adjacent proximate large landowner is the USFS. Portions of the sale area were harvested in the 1950’s during the beginning of the long-term pulp contract. The valley to the south has an extensive timber harvest from that period that is fully regenerated and growing vigorously. In the last several decades the USFS has

facilitated precommercial thinning and instream restoration work along the Harris River with varying timber, wildlife and fisheries objectives. Several long-term silvicultural study plots are established adjacent to the sale area that have been used for forest research by the USFS in conjunction with the more extensive efforts in the Maybeso Experimental Forest to the east.

A USFS sponsored interpretive trail parallels the Harris River south of the timber sale and highway, and one of its associated parking areas is just west of Mile 22.5. The trail is used regularly to access the Harris River for fishing. Another trail leaves the 2025 road north of the west side of the sale area. The USFS Harris River campground is to the west of the sale area at Mile 19.5.

The development of the highway route in the 1980's created a variety of disturbances associated with the construction realignment and rehabilitation of the old roadbed. Several large adjacent material, waste and maintenance staging sites are along the road. The DOT manages the highway corridor. The Mile 23.5 site contains a stockpile of unclassified gravel used by the community for local maintenance. The Mile 22.1 site contains sand stockpiles and is a DOT staging area for winter maintenance equipment. A DOT remote weather observation site also exists near the Hydaburg junction. The highway that passes through the timber sale area serves the communities of Hydaburg and Hollis and is the island's connection to the Alaska Marine Highway serviced daily by the Interisland Ferry Authority from the terminal in Hollis.

The APT powerline to Hollis and Hydaburg parallels the road. Proactive maintenance clearing associated with the power line has occurred within the last five years.

A state subdivision is to the east. The state initiated subdividing the area in the 1980's. The most recent subdivision by the State adjacent to the area was ASLS 2004-29 recorded in 2006, and individual lots have been sold in land auctions by the DMLW. Several mineral claims are also present in the valley.

The surrounding area likely experiences incidental use by the public for a variety of reasons related to semi-remote recreation and subsistence activities including, but not limited to berry picking, hiking, fishing, and hunting.

E. Background and description of proposal

1. Background:

The demand for State timber is currently significant due to the decrease and uncertainty of the federal timber supply. A diversified economy with a timber industry component 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 from all eligible land classifications to help sustain the region's timber industry and economy. In conjunction with this timber supply intent, the DMLW Land Sales Section has made the DOF aware of areas that have a potential of being subdivided and disposed of in less than 10 years.

The Hollis area is relatively proximate to the existing road system and offers forest resource values close to the remaining mills and processing facilities on POW. The DOF, in collaboration with industry and the DMLW, identified the Hollis area as having potential for some timber harvest to support the long-term development of the area for settlement. This coordinated planning is in keeping with the POWIAP intent language for settlement classified land. Existing road access is beneficial to the economics and practicality of a settlement project. The timber sale is projected to develop a pioneer access generally needed for more permanent roads and survey work associated with subdivision development. The roads

also provide physical access for lot development and facilitate appropriate road construction as settlement occurs that is not solely dependent on high initial private or government startup capital. Additionally, while forest values are recognized as desirable to the Alaskan experience, the removal of large trees proximate to building sites, utilities and roads generally makes development safer, particularly in Southeast Alaska.

Where commercial timber exists proximate to the tract, it was generally considered appropriate to include it in the sale in order to contribute to the revenue of the project, but only if its harvest was not expected to significantly detract from other resources; thus provides revenue and scale to timber purchasers for developing the roads to the extent necessary in the sale.

The DOF performed field reconnaissance in the Spring of 2025, of the proposed West Hollis timber sale area. The overall objective was to confirm and examine timber types, potential road access, geology, soils, hydrology, cultural resource potential, and fish and wildlife habitat within the proposed sale area. The timber harvest unit footprints represented in this BIF correspond to proposed operable merchantable timber harvest settings.

2. Timber Volume and Sustained Yield:

The total estimated saw log volume identified in this sale is approximately 3,100 MBF.

The Division of Forestry and Fire Protection 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).

Timber harvest areas located on Settlement-classified land such as this project 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. The timber harvested from this area does not count towards the annual allowable cut.

3. Harvest Unit Design:

Reconnaissance by the DOF indicates that most of the West Hollis area is harvestable using shovel logging techniques. The shovel logging portions of the sale will take advantage of directional timber falling techniques and utilization of benches and terrain to access that portion of the timber. Areas of wet or saturated soil require adequate puncheon in skid trails to minimize impacts to the soil and water quality. Two small downhill harvest settings are projected to require a conventional high lead cable system due to the slope of the hillside. The deployment of a cable system will require site position of the yarder relative to terrain and the timber to minimize impacts to soil and water quality. DOF’s current assessment is that most of the units mapped in the final best interest finding are operable.

This sale will be designed to avoid negative impacts to surface waters and fish habitat identified in the anadromous waters catalog and field assessments by ADF&G and DOF. The DOF identified streams uphill of the Klawock Hollis Highway were observed to have steeper stream gradients than would be expected to provide anadromous fish passage or habitat. The DOF continued to map and assess streams located downhill of the Klawock Hollis Highway after the publication of the PBIF. These streams varied in steepness as they flowed to the Harris River with many containing gradient barriers to anadromous fish a short distance south of the Klawock Hollis Highway. The documentation of fish and

resilience of the terrain (soil and water) to the harvest activity shaped the final harvest units proposed. The original PBIF unit pool has been reduced in the final best interest finding to reflect observed habitat with connectivity to cataloged anadromous waters.

ADF&G has recommended that travel corridors through some of the units may be appropriate for deer movement. The specific use patterns and objectives will be considered in consultation with ADF&G as the units are designed for the FLUP.

4. Unit Access:

Access to the timber sale will be from the POW road system. Most of the road access to the West Hollis Timber Sale will occur from several short spurs connecting to the Klawock-Hollis Highway. One additional spur is proposed connecting to the USFS managed 202500 approximately one quarter mile north of its junction with the Klawock-Hollis highway. The spurs will be built to typical state forest road construction standards in the region unless otherwise authorized by the land manager. The DOF and the purchaser will coordinate with the DOT and USFS for appropriate access authorizations.

F. Resources and management

1. Timber

a. Timber Stand Composition and Structure:

The sale area contains old-growth and young growth timber. The young growth types vary in age and occupy several different site classes. The old growth timber is composed of western red cedar and western hemlock with minor components of Sitka spruce; the older stands generally have visible defects for a variety of reasons (windthrow damage, old age, disease, site position, etc.) or species bias to redcedar with lower volume per acre as they were not previously harvested in the 1950's. The identified 79 acres of operable old growth averages approximately 18 MBF/ acre of sawlog grade timber.

The better young growth timber along the highway is growing on colluvial deposits from the decayed metamorphic bedrock that also has some bed rock intrusions. The well stocked young growth south of the highway is generally a continuation of the colluvial deposits or alluvial deposits. The 67 acres of young growth identified as operable average approximately 25 MBF/ acre of sawlog grade timber.

b. Stand Silvics:

Areas that were previously harvested in the vicinity of the West Hollis timber sale were observed to be fully stocked, vigorous young-growth stands of hemlock, spruce, and cedar seedling, sapling, and pole-timber. These sites appear to have supported stands of red cedar, hemlock, and spruce prior to harvest and have common geology and soil types. Similar regeneration is expected to occur again on these sites proposed for harvest using a clear-cut prescription (even-aged management).

The poorer sites regardless of age appear to have less drainage and thinner soil. Where these lower sights have been disturbed or harvested in the early 1950's they are reforested but for the most part have not produced merchantable size timber in this time frame.

Timber types south of the highway are generally influenced by thicker poorly drained organic soil overlaying glacial rubble and a semi-impermeable layer of bedrock that gives way to the alluvial deposition of the Harris River Valley. These stands are composed mostly of hemlock and redcedar in the old growth areas and hemlock in the young growth stands.

The younger vigorous stands on the high sites from the 1950's era generally are of merchantable size. The better sites have been precommercially thinned. These vigorous stands generally occupy well drained sites with deeper soil at the base of the hillside.

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

Natural regeneration is the preferred regeneration method for this sale, and it is anticipated that adequate stocking levels will be achieved within five years after harvest. Experience with this regeneration method on POW has shown that well-stocked stands are readily established within regulatory timeframes. Logging will break down the slash piece size and residuals to the ground level, accelerating decomposition and opening more growing space. Disturbance associated with logging will also increase seed bed opportunity and survival by creating mineral soil access and micro relief.

Sitka spruce and red cedar are the preferred species for reforestation in the projected future market conditions. Spruce will likely be the dominant species due to anticipated scarification in the units during harvesting operations. Scarification disturbs the vegetative mat and in turn provides a more receptive seed bed. Western hemlock and redcedar will also be a major component of the regenerated stand as well since they currently occupy the site and are prolific seed producers.

- d. Topography and Soils:
The timber sale area is situated on gently rolling upland coastal terrain adjacent to the steeper hillside at the base of Harris Peak. The sale area has a predominantly southern aspect with elevations ranging from 200 to approximately 500 feet above sea level.

Geology is glacial till and brown mineral soil overlaying metamorphic bedrock on the lower reaches, mostly a dark slate with some inclusions. Colluvial deposits are deep at the base of the major hillside slope. Several debris slide paths are evident in the West Hollis subunit that initiated far uphill of the ownership. Bedrock is visible in the exposed reaches of the past slide paths with minimal soil cover at the top end of the paths within the ownership. At the base of the slope incised drainages in the rubble with a notable amount of surface water frequently occur. The hillside overall has a significant amount of surface water in these incised streams with several areas on the east end exhibiting gullied or dissected slopes. Organic topsoil is moderately to poorly drained layers under a thick layer of feather and sphagnum mosses.

2. Wildlife habitat and harvest.

Use of the area by deer and other larger animals was indicated based on wildlife trails and scat. The timber sale area likely serves as a resident and transitional area from the upper reaches of Harris Peak to the valley floor of Harris River for seasonal wildlife movement.

While the surrounding area of Hollis has had significant timber harvested in the 1950's, the timber sale area offers large nondevelopable landscape below and above the proposed units. This observation is based on the present land classification and topography. Efforts by the USFS in the valley in the past twenty years have focused on restoration functions related to fisheries in and adjacent to the river. Historic harvest areas in the valley will likely improve in wildlife habitat potential over time given the age of the stands and the mix of precommercial thinning that has occurred in many of the young growth stands.

The timber sale footprint is distributed in scattered units along the hillside because of the stand variations. This proposed configuration provides a mottled disturbance. The retained timber should provide cover use for wildlife travel. Regardless, the proposed timber harvest cuts will change the local deer habitat which may affect deer numbers. Given the relative size of the timber sale, to the surrounding landscape, the timber sale is not expected to significantly diminish local populations or important habitat. Furthermore, the sale footprint is in a plan area that the DMLW has projected to have more concentrated human uses associated with settlement activities, clearing and occupancy being but part of it. These activities in turn typically displace some wildlife activity.

The development of the POWIAP considered the extensive habitat reservation on the Tongass National Forest. Given the limited contemporary timber supply on the Tongass National Forest, the DNR Commissioner considers discretionary wildlife habitat reservation to be secondary to the Governor's goal of keeping the existing industry supplied with timber through the maximum permissible use of forested State land.

ADF&G commented that "although the impacts of this timber sale will likely be small, the cumulative impacts of clearcuts from the historical logging legacy on POW are likely significant to deer." They recommended that the habitat above and below the timber sale remain connected with timbered corridors for travel. The DOF will provide due deference to ADF&G to define discrete objectives for this request and DOF will determine if they are feasible to implement during the FLUP process.

The DOF used available federal information on cataloged bald eagle nest locations and field observations. No nests were indicated or observed adjacent to the timber sale.

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

The Harris River (anadromous water catalog 102-60-10820) and the estuary are associated with important habitat in the area plan for salmon rearing and other habitat values. All the streams in this timber sale are tributary to the Harris River. The streams above the highway do not provide fish habitat due to the steeper gradient. The streams below the highway generally offer habitat based on the lower gradients and proximity to the river. The DOF, in conjunction with the ADFG, verified the upper limits of fish habitat on all streams between the time the PBIF was published and this decision. The DOF will retain timber to protect the streams as prudent and statutorily required.

The proposed sale will be designed with the intent to protect fish habitat and water quality in compliance with the Forest Resources and Practices Act and regulations (AS 41.17 and 11 AAC 95). As required by AS 41.17.098, DOF provides due deference to ADF&G to ensure all fish and wildlife habitat issues are addressed by the proposed timber sale design. DOF provides due deference to the Alaska Department of Environmental Conservation (ADEC) for all water quality issues.

4. Recreation, Tourism, and Scenic Resources.

Local use of the area is generally dispersed and is associated with activities such as fishing, hunting, berry picking and firewood. A self-guided interpretive trail is located nearby that accesses the Harris River and focuses on riparian functions of Southeast forests, the USFS thinning projects, local history and provides limited pedestrian access to the river. A USFS campground is located one half mile west of the sale area that receives seasonal use primarily associated with summer visitors; the campground is typically closed in the winter. Independent tourist activity occurs throughout POW generally associated with fishing and hunting.

Commercial tourism is not prevalent in the area outside of the lodges mainly focused on saltwater fishing and self-guided freshwater fishing and hunting for deer and black bears. The area associated with this sale is not unique or identified as specifically used by these users. POW Island offers many like areas for this type of dispersed activity.

The topography of the area does not provide extensive view sheds. The scenic resource of the highway is associated with the extensive managed forest landscape. The proposed harvest is in keeping with the visual backdrop of an extensive and modified forest landscape throughout the POW road system.

5. Cultural Resources.

The DOF and the Land Development Section works with the State Historic Preservation Office (SHPO) to identify and avoid known cultural, historic or prehistoric sites in planning the proposed access routes, harvest areas and subdivision development. SHPO provided comment that research has not indicated historic site potential in the area. If archaeological sites are identified, proposed activity and road locations will be appropriately adjusted to avoid conflicts. If any historic or archaeological sites are encountered during road construction or harvest activities, the DOF will immediately inform SHPO and take action to protect and document the findings.

G. Costs and benefits

Based on DOF observations of the project area and historic markets, timber revenue is projected to cover administration, access and operating costs for this sale area and return stumpage royalty to the State. Hollis is within the working circle of most of the sawmills on POW Island. Several local timber purchasers have voiced an interest in timber sales in the Hollis area within the past year. The DOF will encourage domestic processing to the extent feasible at the time of sale. The DOF has received interest in the timber from several mills, consequently the DOF will use its typical request for proposal process (RFP) to determine the specific purchaser(s) with whom to negotiate. The DOF will appraise the timber value in compliance with 11 AAC 71.092 for the proposal markets offered.

The RFP process will consider the track record of the purchaser to locally manufacture wood products (AS 38.05.118), the proposed quantity of value-added wood products to be produced, and the proposed

stumpage rates. Selling the timber in an open and competitive manner using the AS 38.05.120 authority in Southeast Alaska would likely generate higher stumpage revenue to the State. Purchasers of competitive sales typically use the round log export market and obtain higher returns on their investment. A competitive sale using the AS 38.05.120 authority could not be constrained through contract language to use local mills as much as feasible. Depending on the availability of DOF staff and the timing of BIF decision; the DOF projects it will utilize purchaser layout services to aid in the development of the FLUP.

Mobilization costs for logging and road building in a timber sale can be a barrier for some operators relative to how much timber they require for their operations. The relative costs of operating this sale are projected to be average because of its size, location and level of complexity. That combined with the proposed term of the contract of five years is expected to make the timber of interest to several mills. The relatively low volume per acre in parts of the sale is somewhat offset by its location on the island and the presence of western red cedar, a species valued by most mill operators.

Approximately half of the volume of the timber sale is composed of young growth timber. The young growth market has not exhibited resiliency to date. Local lumber is generally sourced from old growth due to the configuration of the mills and the demand for the respective age classes of wood products. Locally milled young growth lumber has generally not provided adequate return for the cost to produce it. Demand for the local young growth lumber products typically compete with commodity kiln dried construction material imported from the lower United States and Canada. For this reason, when significant quantities have been amassed, young growth has traditionally been exported in the round log form to China and Korea. The recent advent of Chinese market restrictions has created demand gaps for some smaller logs in this market. The larger purchasers have been pursuing alternative options for the young growth and the smaller old growth. Results have yet to replace the China market and have hindered or collapsed some sale economics. The export of the young growth is likely regardless of the market available. For the smaller local mills, commercial firewood use in the island school boiler systems has been the outlet for the logs less than 16 inches diameter on the small end for several years. The young growth timber from this sale regardless of size and market and when it is logged will contribute to the overall sale economics through defraying the fixed cost of the sale such as mobilization and road building.

The roads needed to reach the timber are considered basic in construction complexity. Access to the sale area is relatively convenient being on the POW road system and proximate to the community of Hollis and Klawock. The construction of the roads into the sale is the most significant cost associated with the sale. The type of construction anticipated is a rock overlay on a prepared natural subgrade. Relatively little rock appears to obstruct the construction yet appears prevalent enough to develop sources for the purpose of building the road. Several rock pits exist adjacent to the highway, their use would be subject to the land manager's authorization.

The logging system for the most part is the preferred contemporary method of the area (shovel logging). Utilizing best management practices, this method provides significant control to an experienced logger for managing site conditions and is generally cost effective due to the smaller crew and associated labor costs. Some of the steeper slopes of the hillside will govern shovel production capabilities. Units T43(7 acres) and T57 (12 acres) will likely require the use of a downhill short span cable logging with a tower as the sustained grade is over 35%.

Making the timber available on State land is in keeping with the Alaska Constitution and the intent of the governor and legislature to make the resource available in a sustainable manner commensurate with

demand. The timber industry has consistently requested timber and asserted that there is a lack of other options for several years.

The access developed by the timber sale is proximate to existing and projected subdivision development. Logging roads in general have pioneered access to much of SE Alaska. Forest roads have provided many people initial access to land. They are scalable and regularly used in a similar format to build more refined roads. They are appropriate for the timber harvest and the horizon of additional settlement. The forest roads will be constructed to the DOF standards that account for the foreseeable uses. The DOF seeks concurrence of the DMLW Land Development Section for alignments that could be upgraded feasibly to applicable American Association of State Highway and Transportation Officials Guidelines for Very Low Volume Roads. To construct a higher order road currently 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.

VI. PUBLIC REVIEW

The PBIF was publicly noticed in compliance with AS 38.05.945. Notice was posted on the Alaska Online Public Notice System on May 22, 2025. Notices were also posted at the Ketchikan, Craig Public Libraries. Mailed notices were distributed to a mailing list maintained by the Southeast Area Office and public notices were sent to the post offices of Ketchikan, Ward Cove, Craig, Klawock, Thorne Bay, Coffman Cove, Naukati, Metlakatla, Wrangell and Petersburg. A legal notice was also provided in the Ketchikan Daily News; and the Island Post papers.

VII. PUBLIC COMMENT

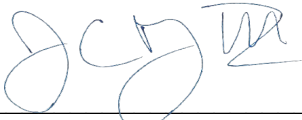
DOF received agency comments from ADF&G and the SHPO on the Preliminary Best Interest Finding. Public comment was received from four individuals and the Southeast Conservation Council.

The comments are summarized in Appendix D. The comment structure is based on the resources discussed in the Preliminary Best Interest document and the topics emphasized by commenters.

VIII. RECOMMENDATION AND DECISION

After due consideration of all pertinent information, the ADNR has reached the following decision: to offer for sale approximately 146 acres of old and young growth forest composed of western hemlock, Sitka spruce, western red cedar and Alaska yellow cedar on Settlement-Remote Recreation classified land on Prince of Wales Island. Harvest activities on the Settlement lands 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 in 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



Commissioner
Alaska Department of Natural Resources

8.6.25

Date

X. RECONSIDERATION

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

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

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

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

If you have any questions, please contact Greg Staunton, Southeast Area Forester, dnr.dof.sse@alaska.gov, 907.225.3070.

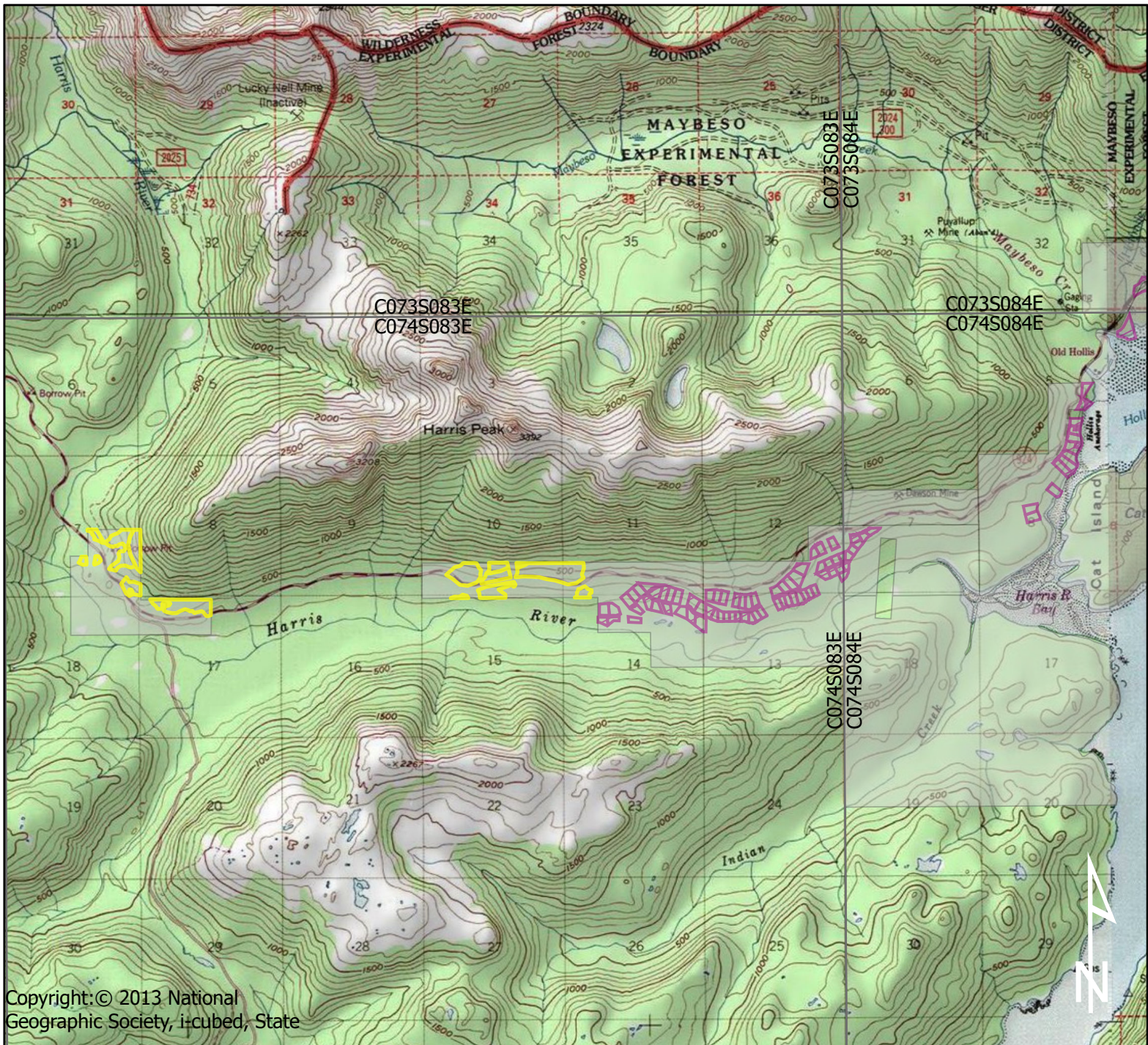
XI. APPENDICES

Appendix A	SSE-1393-K West Hollis Timber Sale Maps
Appendix B	References
Appendix C	Appeal Regulations
Appendix D	West Hollis Timber Sale Comments & Responses

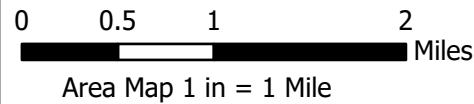
Appendix A SSE-1393-K West Hollis Timber Sale Maps

Vicinity Map (one page)

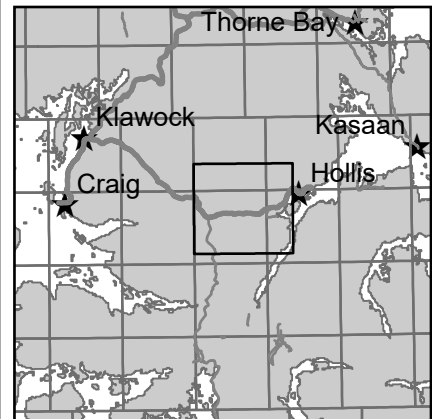
Unit Maps (two pages)



Copyright: © 2013 National Geographic Society, i-cubed, State



Copper River Meridian



Vicinity Map 1 in = 16 miles

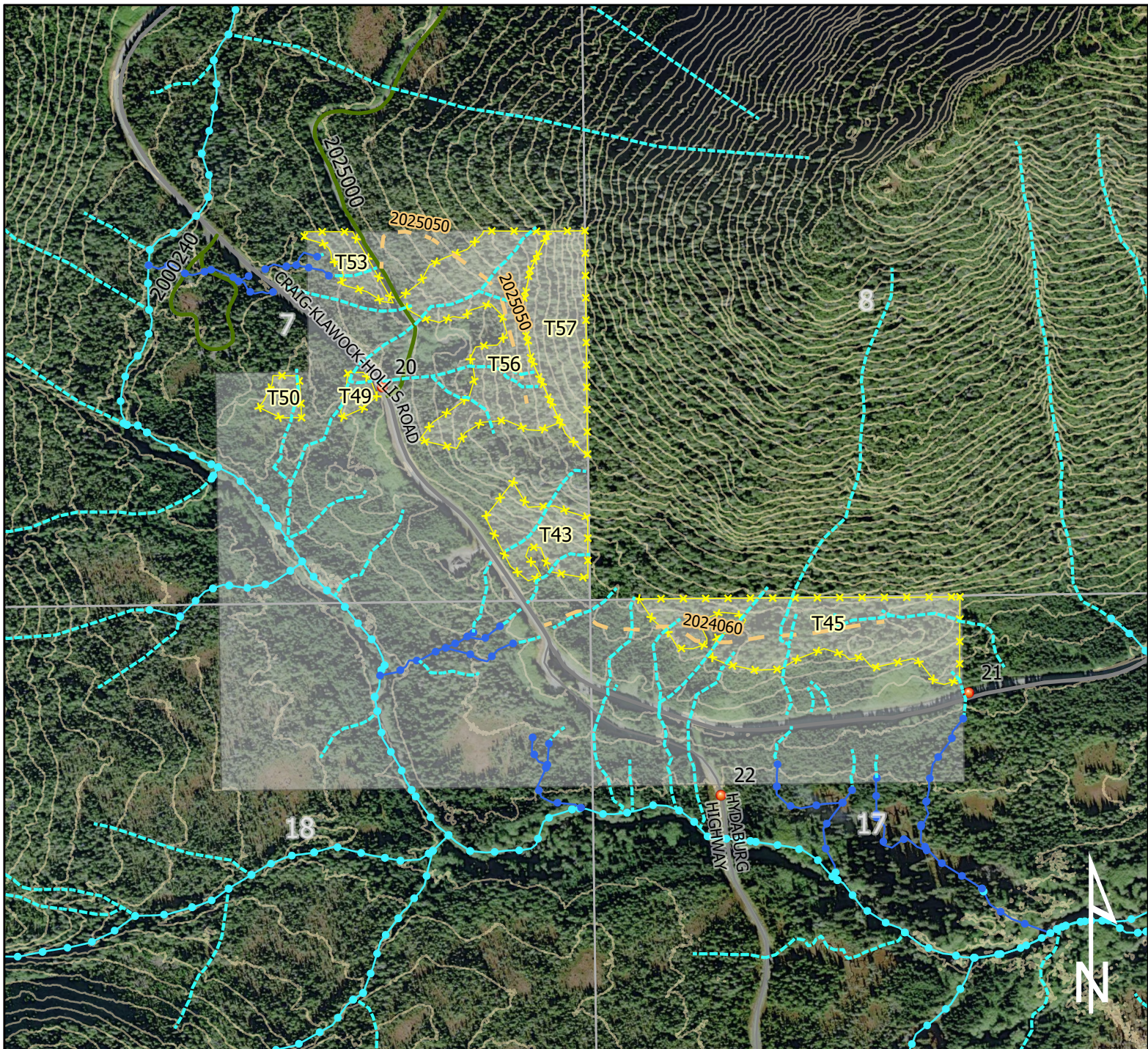
Legend

- Proposed Units
- Private Land
- State Patented

Land Disposal Conveyed

**APPENDIX A1
SSE-1393-K
WEST HOLLIS
TIMBER SALE
AREA MAP**

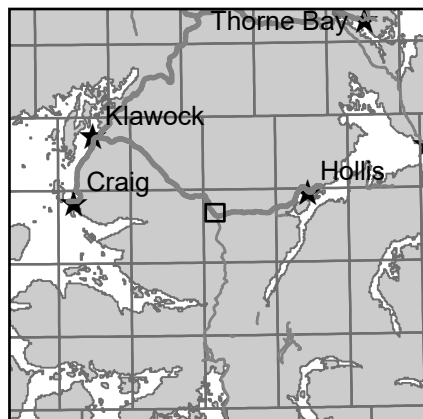




0 500 1,000 2,000
Feet
Area Map 1 IN = 1,000 FT

Section(s): 17 ,18 ,7 ,8
T74S R83E, Copper River Meridian

Contour Interval = 40 FT
Source: USGS DEM

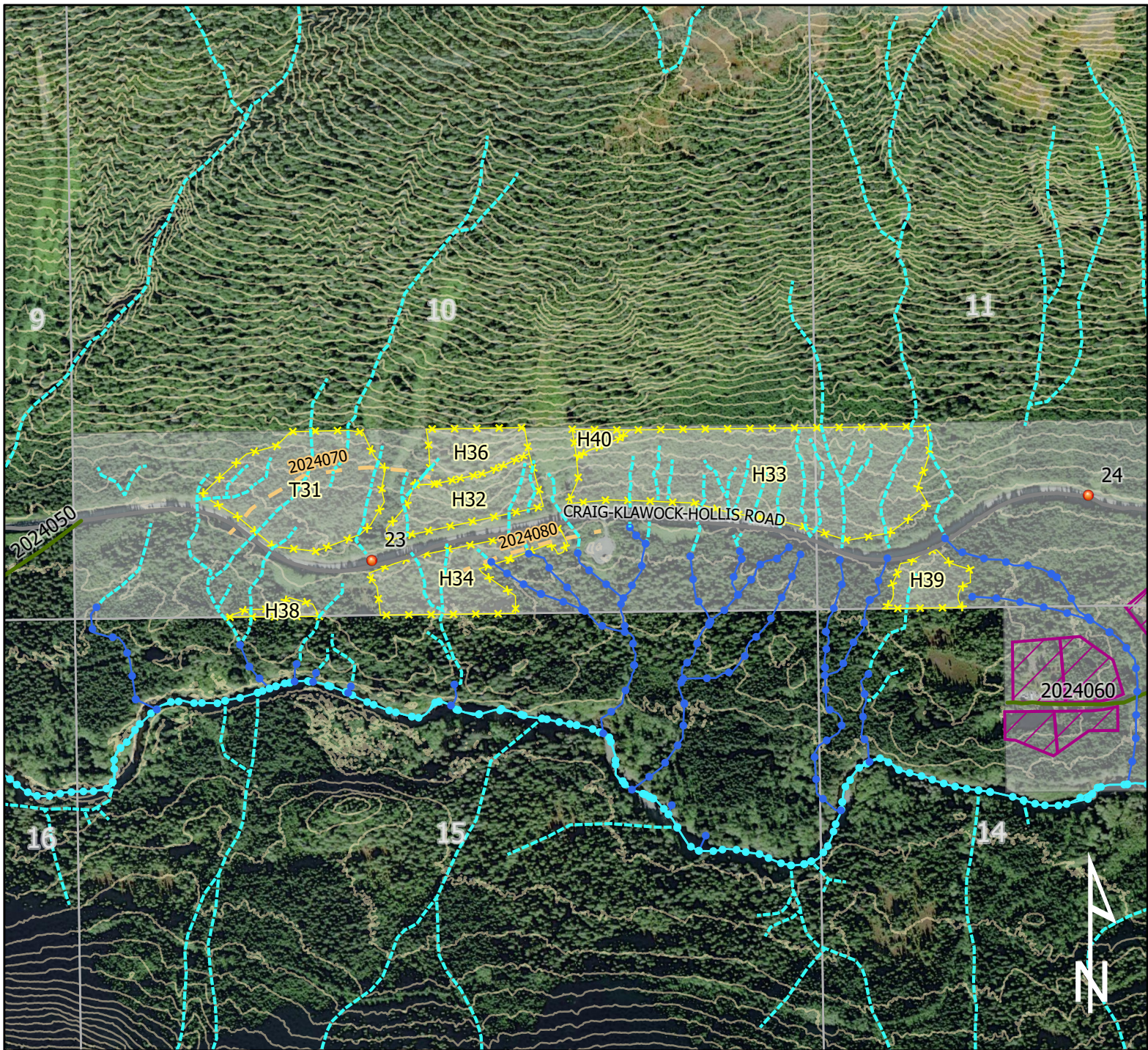


Vicinity Map 1 IN = 16 MI



APPENDIX A2-1 SSE-1393-K WEST HOLLIS TIMBER SALE SALE MAP

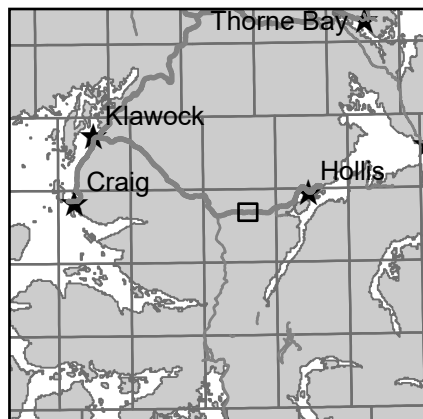




0 500 1,000 2,000
Feet
Area Map 1 IN = 1,000 FT

Section(s): 14,16,11,15,10,9
T74S R83E, Copper River Meridian

Contour Interval = 40 FT
Source: USGS DEM



Vicinity Map 1 IN = 16 MI



APPENDIX A2-2 SSE-1393-K WEST HOLLIS TIMBER SALE SALE MAP



GS 07/29/2025

Appendix B References

Alaska Department of Fish and Game, ADF&G Wildlife Action Plan Appendix 5: Forest Habitats. Available at: https://www.adfg.alaska.gov/static/species/wildlife_action_plan/appendix5_forest_habitats.pdf

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

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.

Minnillo, Mark, Biologist, Alaska Department of Fish and Game, Division of Habitat, personal communications.

Shilling, Timothy, Alaska Department of Natural Resources, Division of Mining, Land and Water, personal communication 2021-2025.

United States Forest Service Geographic Information System Database.

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-1393-K West Hollis Timber Sale Comments & Responses

Preliminary Best Interest Finding West Hollis Timber Sale (SSE-1393-K)

Comments

Department of Natural Resources, Division of Forestry & Fire Protection
February 2025

Commenter	Organization
Mark Minnillo	ADFG Habitat Section
Cody Schwegel	
Tyler Breen	Southeast Alaska Conservation Council
Michael “Mike” Jones	Organized Village of Kasaan
Arthur Martin	
John Sund	
Mckenzie S. Herring	Alaska State Historic Preservation Office (AKSHPO)/Office of History and Archaeology (OHA)

Contents

Scope of Decision	2
Wildlife	4
Fisheries	7
Cultural and Historic.....	8
Costs and Benefits.....	9

The following comments were received during the public comment period on the Preliminary Best Interest Finding for the West Hollis Timber Sale (SSE-1393-K):

Commenter	Topic	DOF Response
	Scope of Decision	
Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)	<p>Precedent for Legal Scrutiny: Alaska Statute 38.05.035(e) requires that any disposal of state land, resources, or interests be preceded by a written finding that the action “best serves the interests of the state.” This BIF must articulate the material facts, applicable statutes and regulations, and any other information required by law that supports the Director’s decision. It serves as the foundation for judicial review should the decision be challenged.</p> <p>Alaska courts uphold the principle that agency decisions must comply with statutory mandates. In <i>State v. Weidner</i>, the Alaska Supreme Court permanently enjoined a land lottery disposal due to the Department of Natural Resources’ failure to prepare required land use plans, adhere to disposal schedules, and satisfy multiple-use mandates. Similarly, in <i>Longwith v. State</i>, the Court invalidated a Commissioner’s preference rights decision, finding that the agency abused its discretion by failing to apply the correct statutory criteria and adequately support its conclusions. These precedents affirm that Best Interest Findings must demonstrate more than procedural completion—they must be substantively grounded.</p> <p>The West Hollis PBIF does not reach a level of reasonable analysis required under this legal framework. While the statute does not compel speculation, it does require consideration of reasonably determinable future and cumulative impacts. These are not hypothetical. Academic and agency-supported research—including decades of studies on logging effects in Southeast Alaska—has established clear, measurable patterns of cumulative ecological decline on Prince of Wales Island, particularly regarding deer habitat loss, watershed degradation, and reduced subsistence access. The PBIF acknowledges that timber harvest has been intensive since the 1950s, but there is no analysis of this timber sale in the context of that history. There is no assessment of the contribution to longer term effects in concert with the previous actions on the land. Cumulative impacts are reasonably</p>	Comment noted, no change required.

	foreseeable and must be integrated into any finding that claims to serve the public’s best interest. The omission of this analysis undermines the PBIF’s credibility and brings it into conflict with the legal standards established under AS 38.05.035.	
Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)	<p>Ecological and Habitat Concerns</p> <p>Mischaracterization of Old-Growth Value: The PBIF downplays the ecological importance of the old-growth forests slated for harvest. In reality, old-growth on Prince of Wales Island has irreplaceable habitat value. These large-tree forests provide winter cover and forage for Sitka black-tailed deer, nesting habitat for birds, and stable hydrological conditions for salmon streams. Scientific assessments have shown that decades of industrial logging have already eliminated the majority of high-quality old-growth in the region. For example, one analysis found that a particularly important old-growth forest type (low-elevation, big-tree stands critical for deer in deep-snow winters) has been reduced by ~94% on Prince of Wales between 1954 and 2004. This staggering loss means the remaining old-growth stands are incredibly valuable for sustaining wildlife populations. The PBIF refers to portions of the sale area as silviculturally “over-mature” or of declining economic value – without recognizing that older complex forests continue to accumulate biomass and support biodiversity.</p> <p>The ecological services of intact old-growth (e.g. climate regulation via carbon storage, maintenance of water quality, provision of diverse habitat niches) far exceed those of young second-growth stands. By mischaracterizing old-growth as readily expendable, the PBIF fails to recognize that these forests, once logged, cannot be recreated without a rotation lasting multiple centuries, if ever. The loss of old-growth habitat would directly harm deer populations (through loss of winter range) and other old-growth-dependent species. It would also diminish subsistence opportunities for local communities that rely on healthy fish and wildlife supported by intact forests. In sum, the PBIF’s treatment of old-growth is a significant ecological oversight. Responsible management demands that the high value of old-growth habitat be acknowledged and preserved wherever possible – a standard this proposal does not meet.</p>	The DOF affords due deference to the ADF&G for with respect to the importance of fish and wildlife habitat. The ADF&G has not indicated that specific habitat should be retained because of its age or character. They did recommend connecting the higher elevation to lower elevation with an unharvested timber corridor to facilitate conditions promoting travel and movement as seasonal conditions warrant. They were not specific in this regard as to location or priority, the DOF intends to continue dialog on this topic during the development of the FLUP.

Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)	Inadequate Analysis of Species Composition: The PBIF contains little or no analysis or discussion of the relative volumes and locations of the various species designated for harvest. In particular, the PBIF seems to suggest that the proposed sale concentrates on harvesting old-growth Western red cedar. This species is valuable for round-log export, but is also valuable for local lumber or other uses, and is growing increasingly scarce as an Alaskan Native cultural resource. It is also relatively scarce within the Southeast Alaska forest to begin with. DOF must analyze this very important issue, and present it for public comment, before proceeding to make a final best interest finding.	The DOF has reduced the originally proposed timber to reflect retention of fishery habitat. The best interest finding has been updated to reflect the timber types present in the remaining pool. Redcedar is not a threatened or endangered species. The DOF is not required by statute or in land management plans to manage or allocate a specific tree species for cultural availability. Availability of timber and specifically this species may be constrained by feasible access; generally it is more significantly constrained by land management on other ownerships which control significantly more of the overall land base in the Tongass Archipelago than the State.
Wildlife		
Mark Minnillo, Area Habitat Biologist, Alaska Department of Fish and Game (ADFG)	Regarding wildlife habitat, harvest of old-growth forest will impact deer habitat, specifically winter habitat. Although the impacts of this timber sale will likely be small, the cumulative impacts of clearcuts from the historical logging legacy on POW are likely significant to deer. Some travel corridors will be provided for through retention areas that will be left along anadromous streams. However, this pertains mostly to Units H34 and H39. We recommend that corridors of at least 300 feet in width be added to Units T56, T57, T45, T31, H36, H32, and H33 in order to connect the lower elevation habitats adjacent to the Harris River and the higher elevation habitats uphill from the Hollis Highway.	The DOF will consider the feasibility and consult with ADF&G on the projected tangible benefits of retaining timbered corridors. The decision and specific applications will be described the FLUP.
Arthur Martin	Studies have shown that Deer populations thrive in clear cut/thinned out Forest because they have more room to run and can better see predators. Hollis has been negatively impacted by a growing wolf population. By having this Harris River timber sale it would help revitalize our local deer population.	Comment noted, no change required.
Michael “Mike” Jones Tribal President Organized Village of	Environmental Detriments: The proposed timber sale area, encompassing approximately 185 acres of timbered land, includes both old growth and young growth timber. The harvesting of this timber poses a severe threat to the local ecosystem. Old growth forests are irreplaceable habitats for numerous species, including those that are endangered or threatened. The removal of these trees will disrupt biodiversity,	There are no known threatened or endangered species or specific habitat of importance for these species at this location. ADF&G was consulted regarding fish and wildlife habitat. Their comment has been integrated into DNR’s decision. ADF&G did not indicate that specific habitat would be irreparably damaged or significantly diminished by this timber sale. They have not

Kasaan	<p>leading to long-term ecological damage that cannot be easily mitigated.</p> <p>Furthermore, the timber sale locations near the Hydaburg Road junction and the old waste pit at Mile 23.5 are critical areas for local wildlife. The disturbance caused by logging activities will have detrimental effects on the habitats of various species, including salmon, which are vital to our subsistence lifestyle and cultural heritage.</p>	<p>indicated that the site is critical habitat. They did state that the cumulative overall harvest on the island may be significant to deer population on the island.</p> <p>The Alaska Forest Resources and Practices Act and Regulations has a track record of maintaining fish habitat using best management practices.</p> <p>Comment noted, no change required.</p>
Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)	<p>Lack of Substantive Deer Habitat Modeling: The document provides no substantive analysis of how the timber sale will impact the Sitka black-tailed deer – a keystone subsistence species on Prince of Wales. Deer are explicitly mentioned in the PBIF, but there is no quantitative modeling of deer winter habitat capability or population carrying capacity post-harvest. This omission is glaring because robust tools and studies exist to evaluate forest impacts on deer. Wildlife biologists have long recommended habitat capability modeling that accounts for winter severity, habitat fragmentation, and predator-prey dynamics. Notably, the standard Forest Service deer model (used in Tongass planning) assumes average snow winters and may mask impacts that occur in harder winters. Best practices call for modeling deer habitat under deep snow conditions – since a single severe winter can drive deer population declines if cover is lacking. The PBIF does not analyze this scenario. It neither runs the traditional deer model nor employs more advanced techniques. This is despite the availability of a new high-resolution deer habitat model developed for Prince of Wales using LiDAR and Random Forest machine-learning. That state-of-the-art model (a collaboration of ADFG, USFS, and others) can predict deer winter habitat selection with 94% accuracy, far outperforming older methods. The PBIF fails to incorporate such best available science.</p> <p>The fact that some lands within the proposed sale area have been assigned non-harvest designations does not absolve DOF from understanding and explaining the effect of logging on wildlife habitat within the areas designated for harvest. For example, in the “Wildlife and harvest” section of the PBIF, DOF recognizes that the proposed logging plan will create a barrier to seasonal migration of deer and other species between higher and lower</p>	<p>ADF&G was consulted per AS 41.17.060 regarding site specific and cumulative impacts to wildlife habitat from this sale. To the extent that ADF&G determined it professionally necessary they analyzed the deer habitat. While critical habitat is not present, important seasonal winter habitat is associated with the old growth timber stands and the topographic location of the timber at the base of the mountain. ADFG further went on the record: “Although the impacts of this timber sale will likely be small, the cumulative impacts of clearcuts from the historical logging legacy on POW are likely significant to deer”.</p> <p>The PBIF did make the point that wildlife use patterns would change with the change in cover type created by the timber harvest. It did not say that the clear cuts would be a barrier to wildlife movement. While open areas may do this in extreme conditions, the risk is more likely associated with predator exposure and energy conservation until stem exclusion phase of the forest regeneration. It is unlikely that the width, breadth and location of these cuts is of a magnitude that would create an actual barrier.</p> <p>The other relevant point made in the decision with respect to the habitat impact is the land classification and allocation made in the area land planning process. The allocation process considers habitat value and overall impacts of previous and planned actions. The eventual intent of the parcel is to be disposed of by the State for settlement and thus occupied with more continuous and intensive activity than the timber harvest. The harvest of portions of the tract currently does not diminish the eventual preferred settlement action.</p>

	<p>elevations, but there is no subsequent, substantive analysis of the impacts on local deer populations of creating that barrier – nor of any mitigations that might reduce those impacts.</p> <p>Throughout that section there is no actual analysis at all, merely a casual reflection that the timber sale footprint “should” provide cover reservation for wildlife travel; and that the proposed logging “will change the local deer habitat and ‘may’ affect deer numbers.” This is rumination, not analysis. Based on a scientific analysis, what changes are in fact likely to occur, and importantly, what impacts might those changes have on local hunting opportunities, especially given the relative scarcity of deer for personal-use hunting on Prince of Wales Island? The section on recreation, tourism and scenic resources notes that commercial tourism in the area includes lodges focused in part on hunting for deer and black bear; yet there is no analysis of potential economic effects due to loss of habitat through the proposed sale.</p> <p>Further, there is no discussion of cumulative, historical habitat loss in the sale area and its near surroundings. The PBIF acknowledges the heavy logging that has occurred previously in the areas adjacent to the proposed sale, but does not consider the cumulative effect of habitat loss from that earlier, heavy logging together with the additional loss of habitat from the proposed sale. The PBIF merely suggests that the habitat potential of those previously logged lands will likely improve over time.</p> <p>That may be, but at present those previously, heavily logged lands are in various stages of greatly diminished habitat capability. The proposed timber harvest will inevitably make that cumulative problem worse. And if all of these lands are harvested again on a rotation of 100 years, the lands will never regain full old-growth habitat values, and will remain diminished. Thus, under conditions of ongoing future harvest, the overall habitat capability of lands may not improve. DOF cannot avoid a discussion of the cumulative impacts of the proposed sale merely by noting that the sale area is relatively small compared with the surrounding landscape. Moreover, there is no indication that the Alaska Department of Fish and Game has had any input into DOF’s discussion of these wildlife habitat issues.</p> <p>By neglecting to model deer winter range loss, the document cannot assure the public that deer populations (and by extension,</p>	
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	<p>wolf populations and subsistence hunting opportunities) won't be significantly harmed. This lack of analysis violates the sustained yield duty for wildlife. It also contradicts AS 38.05.112(c)'s intent that forest plans consider "non-timber uses" – here, the PBIF gives only lip service to deer without data. In Southeast Alaska's rainforest, deer depend on sufficient intact winter habitat to survive and rebound each year. Before any timber sale proceeds, DNR must evaluate deer habitat capability and impacts to subsistence as a cumulative assessment of its actions (including in conjunction with other agency actions as the viability of resource take on a sustained yield basis is not limited to the dimensions of state holdings). The current PBIF's omission of substantive deer modeling renders its wildlife impact conclusions unreliable.</p>	
	Fisheries	
<p>Mark Minnillo, Area Habitat Biologist, Alaska Department of Fish and Game (ADFG)</p>	<p>ADF&G reviewed the maps included with the PBIF, Atlas and Catalog of Anadromous Waters, and ADF&G Habitat GIS stream survey mapping database. Additionally, on May 6, 2025, we received maps (Appendix A2-1 and A2-2 attached) from DOF depicting several additional streams determined to be anadromous by DOF based on your field reconnaissance. ADF&G concurs with DOF's determination that the streams shown on the maps are non-cataloged anadromous streams based on the criteria of being connected to known cataloged anadromous streams, low gradient, and dominated by gravels and cobbles. ADF&G will make an effort in the future to document anadromous fish in these streams and nominate them for inclusion in the Anadromous Waters Catalog.</p>	<p>The timber sale maps have been updated to reflect the agency comment.</p>
<p>Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)</p>	<p>Inadequate Fish Habitat Analysis (Harris River Watershed): The PBIF's consideration of fisheries and aquatic habitat is cursory, particularly regarding the Harris River, a salmon-bearing system in the project area. The Harris River and its tributaries support populations of coho, pink, and chum salmon, steelhead trout, cutthroat trout, and Dolly Varden char. These fish are vital for subsistence, sport, and ecosystem health. The watershed, however, has a history of intensive logging and resultant habitat damage. In fact, the Harris River was the focus of a major salmon habitat restoration effort over the past decade. By 2011, the U.S. Forest Service, Trout Unlimited, and other partners spent roughly \$3.5 million and seven years rehabilitating stream channels and riparian areas in Harris River and Fubar Creek, after heavy clear-cut logging from past decades had caused "major erosion and blocked fish</p>	<p>The proposed sale avoids all anadromous fish streams. The proposed activity in surface waters is minimized and will be mitigated through the use of best management practices of the Alaska Forest Resources and Protection Act and Regulations. The FRPA is an established and appropriate methodology for managing nonpoint sediment and pollution associated with timber harvest. The roads in this sale will be closed at the end of the sale and will be put into storage (Closed per FRPA), although depending on the condition of the road, the amount of firewood present and the availability of maintenance funding, the DOF will consider leaving the road open at the conclusion of operations. Most public firewood gathering is done within the first several years of the timber harvest. Because of the long-term obligations and</p>

	<p>passage”. Large wood structures were placed in-stream, and the river has been recovering its natural function.</p> <p>This context heightens the concern that new logging upslope or upstream could undermine those restoration gains. Yet the PBIF provides only general statements that Forest Resources and Practices Act (FRPA) buffers will protect fish streams, and that turbidity “should settle out” given gentle topography. Such assurances are not backed by site-specific data or modeling. There is no analysis of sediment risk from the many miles of logging roads and stream crossings that would accompany the sale. There is no discussion of how increased peak flows from timber removal could scour streambeds or how loss of forest cover could raise summer water temperatures. The PBIF’s fish habitat section does not reflect a deep understanding of the impact from prior activity in the Harris River watershed. DNR is obliged (by Article VIII, §4 and by AS 41.17, the Forest Practices Act) to ensure fish habitat is protected. The current PBIF fails to effectively assess impacts to, or the importance of multiple use on, the Harris River watershed and the public’s interest in productive fisheries. Before proceeding, as with deer populations, cumulative assessments of impacts to the watershed should be conducted, including input from ADF&G habitat biologists.</p>	<p>mobilization costs to perform maintenance on forest roads, it typically makes programmatic sense to close roads at the conclusion of timber harvest or shortly thereafter. This approach removes significant long-term risks associated with drainage structure and surface maintenance.</p> <p>The amount of harvested timber acres associated with this sale is relatively insignificant to the overall timbered acres of the watershed; temperature change of the streams due to timber removal is projected to be insignificant based on the surface area cover types involved.</p>
	Cultural and Historic	
<p>Mckenzie S. Herring, Archaeologist I - Review and Compliance Alaska State Historic Preservation Office (AKSHPO)/ Office of History and Archaeology</p>	<p>Review of the Alaska Heritage Resources Survey (AHRS) database indicated there are no <i>reported</i> cultural resource sites in the direct area of the proposed activities, and we do not anticipate adverse effects to significant cultural resource sites from the project. However, please keep in mind that only a very small portion of the state has been surveyed for cultural resources and therefore the possibility remains that previously unidentified resources may be located within the project area. As such, should inadvertent discoveries of cultural resources occur, work in the area should halt, and our office notified so that we may evaluate whether the resources should be preserved in the public interest (as specified at Section 41.35.070[d]). Any information provided helps the State better manage Alaska’s heritage resources. Examples of cultural resource sites that could be encountered include (but are not limited to): historical cabin remains (collapsed, standing, or foundations); adits; dredges or other mining equipment; cultural depressions or pits; graves or</p>	<p>Comment noted, no change required.</p>

	cemeteries; prehistoric tools or artifacts; and paleontological (fossilized) remains.	
	Costs and Benefits	
Cody Schwegel	<p>While I understand the intention behind offering this timber for harvest, I'm concerned that the way this sale is structured mostly shuts out local benefit. The size of the sale and the bond requirements make it nearly impossible for small local mill operators to compete. That means the contract is likely going to go to a large-scale outside company, not someone from the community. If that's the case, the economic benefit won't really make it back to Hollis or the island in a meaningful way.</p> <p>To add to that, from what I understand, the high value timber in this area is not even accessible to the small mills anyway. So even if locals wanted to try, the deck is stacked against them.</p> <p>In my view, this sale as written doesn't serve the best interest of the community. If it can't be structured to support small scale, in-state, local operators, then I'd rather see the timber left standing. It's more valuable as a forest than as a sale that only benefits large contractors with no lasting ties to the land or the people.</p>	Comment noted, no change required.
Arthur Martin	<p>I am in Favor of the West Hollis Timber Sale.</p> <p>(It) Increase the local economy. Timber is a self-renewing industry when managed correctly. This sale would bring jobs/keep jobs on the island not just for the loggers but also the local private mills whom would benefit.</p>	Comment noted, no change required.
Arthur Martin	<p>I am in favor of this project especially IF the logging roads remain intact after the project's conclusion. By keeping the logging roads open, it allows the community members to come in and gather firewood for the winter from the many unused logs that will remain.</p>	<p>Depending on the condition of the road, the amount of firewood present and the availability of maintenance funding, the DOF will consider leaving the road open at the conclusion of operations. Most public firewood gathering is done within the first several years of the timber harvest. Because of the long-term obligations and mobilization costs to perform maintenance on forest roads, it typically makes programmatic sense to close roads at the conclusion of timber harvest or shortly thereafter.</p>
John Sund	<p>I am very encouraged by the requirement in the sale conditions requiring in-state manufacturing. Although it is a relatively small volume of timber it is located near the main highway between</p>	Comment noted, no change required.

	<p>Hollis and the Klawock - Craig communities. And the harvesting of the timber stand will be visible from the highway and impactful of the traffic on the highway.</p> <p>In your presentation it was noted most of the timber stand is young growth with a smaller volume of old growth trees. The challenge is a market for the young growth. And it is a challenge for the very small mill operators to harvest timber that is difficult and expensive to access. Hopefully a few of the small operators can figure out a way to participate in the sale.</p>	
John Sund	I am supportive of the West Hollis Timber Sale providing the timber is manufactured in state. I am opposed to any round log export of logs from this sale.	Comment noted, no change required.
Michael “Mike” Jones Tribal President Organized Village of Kasaan	The Prince of Wales Island, including the area around Hollis, is already facing significant resource constraints. The infrastructure in place is not equipped to handle the increased traffic and industrial activity that will accompany the timber sale. The Klawock-Hollis Highway and other access roads are not designed for heavy logging trucks, which will lead to accelerated wear and tear, increasing maintenance costs and posing safety risks to local residents.	The Klawock Hollis Highway is a public highway managed by the Department of Transportation (DOT) and policed by the Department of Public Safety (Troopers) to maintain reliable public transportation and commerce. Access to it is a permitted authorization of DOT and is independent of the timber sale. Weight and traffic type is also regulated by DOT. The timber sale contract requires the purchaser to comply with applicable law. Road traffic management is contractually also required by DOF to protect public safety and the infrastructure.
Michael “Mike” Jones Tribal President Organized Village of Kasaan	Additionally, the local community relies heavily on the natural resources provided by the surrounding forests. The proposed timber sale threatens these resources, which are essential for our subsistence, cultural practices, and economic well-being. The depletion of these resources will exacerbate the challenges faced by our community, which is already struggling with limited economic opportunities and high unemployment rates.	Comment noted, no change required.
Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)	Violation of the Sustained Yield Principle: The Alaska Constitution explicitly requires that “fish, forests, wildlife, grasslands, and all other replenishable resources” be utilized and maintained on the sustained yield principle. This sustained yield mandate is echoed in statute as the need to achieve and maintain output in perpetuity of renewable resources “consistent with multiple use.” The West Hollis PBIF contravenes this core principle. By authorizing a large volume of old-growth forest	The sustained yield and multiple use requirements have been categorically met through land use allocation in the area planning process.

	<p>without recognizing that a 100-year rotation never allows for the regeneration of old-growth habitat—so removing it removes habitat permanently—the sale would diminish the future viable habitat values and ecological productivity of these forest lands. Old-growth stands scheduled for harvest serve as critical deer winter range and salmon-bearing watershed; removing them now sacrifices the sustained yield of wildlife and fish for a one-time timber payout. This approach is contrary to the sustained yield requirement in Article VIII, §4. Sustained yield is not met if the annual harvest exceeds the forest’s ability to regenerate comparable resources perpetually, or if short-term timber extraction impairs the sustained yield of wildlife that the forest supports. The PBIF fails to demonstrate that the proposed harvest level can be sustained or that it will sustain wildlife populations in perpetuity, as required by law. Furthermore, the operational definition of “sustained” is being used by DOF to justify consistent output - i.e. consistent production, rather than the capacity to sustain output consistent with multiple use into perpetuity.</p> <p>The distinction being that to have sustained yield into perpetuity, the analysis needs to assess cumulative and compounding impacts over time and the impacts to associated ecosystem services, such as habitat provision. Under AS 38.05.112, the state is required to “consider the best available data, including information provided by other agencies.” Nowhere in the PBIF is there any indication that the Department of Fish and Game have assessed the impacts to habitat of this project or had any input in this Best Interest Finding. In light of the seeming lack of consultation with the Department of Fish and Game, this PBIF has missed any data that the agency likely has in relation to the habitat value situation on the proposed sale area. Similar data have been available for decades, such as the Tongass Forest Deer Habitat Capability Model as well as Person et al. and Albert & Schoen’s studies on landscape-scale habitat loss⁵. This is particularly germane to the multiple use mandate. The island’s capacity for maintaining deer populations (a critical economic resource) is diminishing. On Prince of Wales “residents are not meeting their subsistence needs for deer, which is one of the most harvested and utilized subsistence resources by POW communities.”</p>	
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Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)	<p>Failure to Establish a Sustained Yield Calculation: The PBIF notes that the “total estimated saw log volume identified in this sale is approximately 3,800 MBF.” However, it does not explain how this harvest volume aligns with the sustained yield framework - specifically how this level of harvest corresponds to a defined volume being harvested from some particular area over some particular time period. In other words, there is no actual sustained yield calculation or demonstration that the proposed harvest is consistent with long-term forest productivity limits. Without this calculation, the public has no way of assessing the State’s compliance with its sustained yield mandate.</p>	<p>The DOF is disposing of the timber resource incidental to the primary use as defined by the land classification (Settlement). Settlement land is destined for disposal and subsequently will be out of direct control of the State. For this reason, the timber resource is not included in the pool of timber allocated for disposal on a sustained basis.</p>
Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)	<p>Failure to Uphold the Multiple Use Mandate: Alaska’s laws compel a balanced, multi-value approach to land management. The Alaska Land Act and Constitution mandate “maximum use consistent with the public interest” and utilization of resources for the “maximum benefit of [the] people.”</p> <p>The principle of multiple use – defined as management so that various resource values are used “in the combination that will best meet the present and future needs of the people of Alaska” – is a statutory requirement for state land planning and disposals. The West Hollis PBIF does not meet this mandate. It focuses myopically on timber extraction, to the detriment of other uses of the area such as subsistence hunting, recreation, and fisheries. There is no significant consideration of deer habitat needs, community harvest needs, subsistence access, watershed protection, or tourism values in the PBIF. By treating timber as an isolated commodity, the PBIF fails to integrate the “principles of multiple use” in its decision-making. This one-dimensional approach conflicts with AS 38.05.035’s requirement that the DNR consider “the facts pertaining to the land, resources, or property, or interest in them...” in determining the best interest of the state¹⁰. In short, the PBIF does not demonstrate the “balanced use of renewable and nonrenewable resources” that Alaska law requires. It does not include an assessment using available relevant data. Removing high-value habitat for a single use (logging) undermines the public’s common use of wildlife and fish, violating Article VIII, Sections 1 and 2’s intent that development occur for the common good and public interest. By relying on the Forest Resources and Practices Act (FRPA) definition of sustained</p>	<p>ADF&G has not identified the proposed timber sale as high value habitat. The sustained yield and multiple use requirements have been categorically met through land use allocation in the area planning process. Site specific important habitat has been protected and used to augment allocation per the area management plan intent in the POWIAP Chapter 2 and the FRPA.</p> <p>Per the POWIAP: “Black Bear, Marten, Deer, Wolf and Waterfowl Habitat. Through the Forest Land Use Management Plan process, DNR will make allowances for important bear, marten, wolf, Sitka black-tailed deer, and waterfowl habitat identified by ADF&G. DNR, in cooperation with ADF&G, may apply more detailed habitat protection through the Forest Land Use Plan process. Concentration areas and seasonal use patterns for these species are to be supplied by ADF&G as part of the preparation of the Forest Land Use Plan.”</p> <p>ADF&G stated that the “Although the impacts of this timber sale will likely to be small, the cumulative impacts of clearcuts from the historical logging legacy on POW are likely significant to deer”. Related to this statement, ADF&G indicated that “wildlife travel corridors through the units may be advisable to facilitate movement from high elevation to the valley floor” depending on the final configuration of the harvest.</p>

	<p>yield—“the achievement and maintenance in perpetuity of a high level annual or regular periodic output of the various renewable resources of forest land and water without significant impairment of the productivity of the land and water...”—this analysis fails to adequately address two key components of that mandate. First, it does not assess maintenance in perpetuity, due to a failure to consider cumulative impacts. Second, it overlooks the requirement of avoiding significant impairment of land and water productivity, due to an inadequate ecological baseline analysis. Absent these assessments, the PBIF analysis is both ahistorical in its baselines and contextually disconnected from the broader landscape of cumulative environmental impacts.</p>	
<p>Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)</p>	<p>Net Public Benefit: The PBIF does not convincingly show that the West Hollis sale will yield a net positive benefit to the State of Alaska and the general public. Article VIII, Section 2 of the Alaska Constitution requires natural resource development to be for the “maximum benefit of [the] people”. Similarly, the best interest finding process under AS 38.05.035(e) is meant to ensure that disposals of public resources result in overall public gain. Here, the benefits cited – a short-term infusion of logging jobs and timber royalties – are marginal and speculative, while the costs and trade-offs are significant. The PBIF acknowledges some employment during the harvest and perhaps a boost to local service businesses (fuel, groceries, etc.). However, it fails to account for offsetting economic losses and externalized costs. For instance, degradation of deer and salmon populations can adversely impact local subsistence users and sport fishing businesses, which are part of the region’s economy. Scenic and recreational values, important for tourism and quality of life, will be diminished – yet the PBIF dismisses this with a cursory claim of “no adverse changes to recreational use” even though the sale area will be visible from Hollis and frequented by residents. Moreover, there are direct costs to the State that go unmentioned, such as expenses for sale layout, road building (if state-supported), and post-harvest site remediation. The PBIF does not provide a cost/benefit accounting that weighs timber revenues against these liabilities, but mentions that “revenue and scale to timber purchasers for developing the roads to the extent necessary for the sale”. This would imply a significant burden to small-mill</p>	<p>The Constitution of the State of Alaska Article VII does not specify that the sale of a public resource shall yield a “net positive benefit”. ARTICLE VIII - NATURAL RESOURCES, § 8.1 - Statement of Policy is: “It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest”.</p> <p>The Commissioner of the Department of Natural Resources is delegated by the legislature to make findings regarding the best interest of the State with respect to the disposal of state resources.</p> <p>AS 38.035(e) defines the duties of the Commissioner, the process and scope of the States’s best interest findings made by the department. The best interest finding for the West Hollis timber conforms with the requirements of AS 38.05.035(e).</p>

	<p>operators' access as is indicated to be the target demographic for this sale.</p> <p>Historical economics in Southeast Alaska indicate that large timber sales on remote state lands often barely break even, or even operate at a loss, when agency and infrastructure costs are considered. One public commenter in a similar sale noted that a true cost-benefit analysis would consider negative impacts to tourism and fisheries, and that the community's economic future lies in sustainable uses like fishing and recreation rather than resource exploitation. The PBIF gives no such analysis. It thereby fails to demonstrate that this particular sale would maximize public benefit. The profits will accrue primarily to the private timber purchaser, while the public incurs habitat loss, resource degradation, and the further depletion of common pool resources such as subsistence deer. This imbalance does not meet the constitutional standard of common benefit, nor does it satisfy the statutory best interest of the state.</p>	
<p>Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)</p>	<p>No specific sale structure providing local value-added processing: By sheer volume alone, the structure of the West Hollis sale appears geared toward large mill export of raw logs, rather than fostering in-state processing or value-added industry. While the PBIF states the intent for local processing, no sale structure mandate specifically incentivizes access by small mill operators best suited to actually deliver on that intent. The PBIF does not include any requirement for local milling or any provisions under AS 36.15.010 (Alaska product preference) to prioritize in-state use of the timber. While it is commendable that the PBIF intends to support "employment on POW by processing as much of the timber locally as feasible", there needs to be a specific mechanism to reach out to small mill operators to increase their access to sale opportunities. In a recent trip, SEACC staff spoke with small mill operators who expressed difficulty in accessing the traditional RFP process used by DOF. Similarly, it is necessary for DOF to define the term "as feasible". Feasibility should not be defined by any mill's desire for maximum profit, but by the intent of keeping local processing and value-added economic benefits within Alaska's economy.</p> <p>In order to address the stated intent of supporting the local economy on Prince of Wales, the State should negotiate multiple</p>	<p>The specification of the sale method (AS 38.05.118) defines the intent of the DOF to make the timber available to the extent feasible for local mill use by a negotiated process.</p>

	sales specifically designated for very small mill operators.	
Tyler Breen Policy Analyst Southeast Alaska Conservation Council (SEACC)	<p>Hollis Subunit 12b – Ecological Value, Misuse of Settlement Designations, and Undefined “Intensive” Harvest Criteria</p> <p>The PBIF’s treatment of Hollis Subunit 12b illustrates a pattern of analytical inconsistency and insufficient ecological assessment. The document acknowledges that “most of the uplands adjacent to the creeks and the Harris River are important for community hunting, trapping, and berry picking. Waterfowl, deer, and bear hunting occur along the Harris River and its estuary.” It then states that these uplands “are not designated for intensive harvest because they do not meet the criteria for intensive harvest.” However, the PBIF provides no explanation of what constitutes “intensive harvest” or how that determination is made in this context. Without a clear standard, it is not possible to evaluate whether that designation—or its absence—is scientifically or legally justifiable.</p> <p>This omission is especially concerning given the extensive harvest history in the region. The PBIF notes that “the adjacent proximate large landowner is the USFS. Portions of the sale area were harvested in the 1950s during the beginning of the long-term pulp contract. The valley to the south has an extensive timber harvest from that period that is fully regenerated and growing vigorously.” Yet “growing vigorously” is a silvicultural term that reflects timber volume, not ecological recovery. The PBIF provides no evaluation of whether habitat functions—such as winter range for deer or watershed support for salmon—have been restored. There is no wildlife habitat modeling, baseline monitoring data, or analysis of carrying capacity in the regenerated areas to justify claims of recovery.</p> <p>Furthermore, the PBIF attempts to discount ecological concerns by removing nearby Twelve Mile Subunit 12a from sustained yield consideration on the basis that it is classified for “Settlement Use.” This classification is aspirational and does not eliminate the requirement to assess ecological impacts under sustained yield principles. Habitat loss, fragmentation, and biodiversity decline inevitably occur after logging, regardless of whether the land is subsequently settled. To treat a settlement designation as a license</p>	<p>The land classification process considered adjacent land ownership use and conditions. The public, other agencies and specifically ADF&G were consulted in that process.</p> <p>Intensive harvest areas are defined geographically in the POWIAP based on public and agency input during the area planning process. Per POWIAP Chapter 1: “The intensive harvest designations reflect only a portion of all areas used for commercial fishing or by communities for personal use. The reason for limiting the size and number of designated areas is to provide greater protection to the most important areas. Within a designated area, an activity can be subject to stringent siting and operating stipulations, or denied, to protect an important resource or use.” Intensive use was not identified in the proposed timber sale area.</p> <p>The PBIF description of the Harris River valley pertains to the observed vigor of the young growth forest. Vigor relates to the health of the stand and indicates the likely reforestation response to the proposed timber sale. The health of many other resources is incidental to this response. For this reason, as a forest manager, we indicate the comparable condition to validate our ability to propagate a timely reforestation outcome at the site. Resources that require more consideration are typically addressed on a site-specific basis through agency comment on the proposed sale and in the land classification language as needing accommodation.</p>

	<p>to intensify harvest or exclude land from impact calculations violates the obligation to uphold sustained yield as defined under the Forest Resources and Practices Act. The statute defines sustained yield as “the achievement and maintenance in perpetuity of a high level annual or regular periodic output of the various renewable resources of forest land and water without significant impairment of the productivity of the land and water, but does not require that timber be harvested in a non-declining yield basis over a rotation period.” This definition clarifies that sustained yield extends beyond timber volume to include the long-term productivity of land and water resources—encompassing wildlife habitat, watershed function, and subsistence use. The PBIF fails to demonstrate how these broader resource values will be maintained under the proposed harvest.</p> <p>In sum, the PBIF uses vague or incomplete criteria to justify aggressive harvest without acknowledging the lack of ecological recovery, cumulative habitat loss, or the impact on fish and wildlife. Without clear definitions of what constitutes “intensive” use, or evidence that regeneration has met habitat standards, the PBIF’s conclusions about land suitability and impact are neither scientifically nor legally defensible.</p>	
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