

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



**Coastal Region-Southeast Area Office**  
**Forest Land Use Plan**

**Odyssey Timber Sale**  
**Exchange Cove Subunit**  
**SSE-1391-1**  
**September 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 & Fire Protection
FLUP	Forest Land Use Plan
FRPA	Alaska Forest Resources and Practices Act
FYSTS	Five-Year Schedule of Timber Sales
MBF	Thousand board feet
OHA	Office of History and Archeology
POG	Productive old growth
POW	Prince of Wales
POWIAP	Prince of Wales Island Area Plan
ROW	Right-of-way
SESF	Southeast State Forest
SESFMP	Southeast State Forest Management Plan
UA	University of Alaska
USFS	United States Forest Service

# Forest Land Use Plan for Odyssey/Exchange Cove Timber Sale SSE-1391-1

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## **I. Introduction**

Project File Number: SSE-1391-1

Division of Forestry & Fire Protection Office: Southeast

Area Forester: Greg Staunton

Forest Practices Geographic Region (AS 41.17.950): Region I

This Forest Land Use Plan (FLUP) covers proposed forest operations on approximately 107 acres of land on Prince of Wales Island, approximately 6.5 miles to the north of the community of Whale Pass. It is intended to provide the best available information regarding the proposed harvest of timber, and management of other non-timber uses in compliance with AS 38.05.112 and AS 41.17.060, and must be adopted by the DNR before the proposed activity can occur.

☒ This Forest Land Use Plan is for timber sale(s) which have been determined to be in the best interest of the state pursuant to AS 38.05.035 (e) and AS 38.05.945. This FLUP does not determine whether or not to access and sell timber within the timber sale area, nor the method of sale. Those decisions have been made previously in the March 7, 2025, Best Interest Finding and are not appealable under this FLUP. The Best Interest Finding is available at:

<http://notice.alaska.gov/218718>

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

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

A draft of this plan was distributed to the Alaska Department of Fish & Game (ADF&G) and the Department of Environmental Conservation (DEC) for their review and comments relevant to the consistency of this proposed project with the statutes governing forest land use plans (AS 38.05.112) and the requirements of the Alaska Forest Resources & Practices Act (AS 41.17) and its Regulations (11 AAC 95). This Forest Land Use Plan was also made available for public comments; the review period ended on August 18, 2025. After public and agency review of the draft FLUP, the DOF reviewed and responded to comments (see FLUP, Appendix D), and made minor technical changes to the operational content and has adopted this FLUP.

This Forest Land Use Plan has been adopted by the Department of Natural Resources. Site specific compliance with the Alaska Forest Resources and Practices Act and the Regulations for this proposed project are reflected in this Forest Land Use Plan and are required as a performance requirement in the Timber Sale Contract.

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

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

- Alaska Forest Resources & Practices Act
- Prince of Wales Island Area Plan
- Odyssey Timber Sale Best Interest Finding SSE-1391-K

The administrative record for this sale is maintained at the Division of Forestry & Fire Protection Southeast Area Office filed as SSE-1391-1. The file is a sub-file within the Odyssey Timber Sale SSE-1391 K.

#### **A. Legal description**

Sections 20, 29 and 32, Township 65 South, Range 80 East, Copper River Meridian (CRM). The sale area is found within the Petersburg A-4 NE USGS quadrangle. See attached map titled: Appendix A, SSE-1391-1 Exchange Cove Timber Sale Harvest Area Map.

#### **B. Operational Period**

Approximately Summer 2025 through end of 2030.

#### **C. Timber Disposal**

- ☐ Timber will be sold and will have a contract administrated by the State.
- ☐ Timber will be available to the public; permits obtained by the public will be issued by the State.
- ☒ Other. Note: this timber has been sold Viking Lumber Company Inc. and is administered in a contract that was executed on June 30, 2025.

#### **D. Objectives and Summary**

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

## II. Affected Land Owners/Jurisdictions

### A. State

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

### B. Other Land Interests

Land Interest, Representative: USFS Road System, District Ranger.

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

Forest operations will be designed to:

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

Harvest and Silvicultural Methods:

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

## A. Timber Stand Description and History

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

## B. Timber Harvest Activities

Timber Harvest Activities are displayed in Table 1.

**Table 1. Timber Harvest Activities**

Unit-Setting ID	Acres	Topography	Silvicultural Action	Logging Method
1	25.6	Irregular Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging
2*	36.5	Irregular Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging
3	8.4	Irregular Slopes	Even-aged Management utilizing a clear-cut system	Shovel Logging
110*	34.4	Hillside	Even-aged Management utilizing a clear-cut system	High Lead Cable
210	1.7	Hillside	Even-aged Management utilizing a clear-cut system	High Lead Cable
<b>Total</b>	<b>106.6</b>			

\*Approximately 9 acres will be retained in Units 110 and 2 for a 300-foot-wide deer travel corridor.

## C. Site Preparation

☒ Site preparation will not be necessary. There will be sufficient soil disturbance by logging to forego the need for additional ground scarification.

☐ Site preparation will be implemented and described in Table 2:

**Table 2. Site Preparation**

Unit ID	Acres	Site Preparation Method	Date of Completion
		Not Applicable	

#### D. Slash Abatement

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

#### E. Soil Stability / Erosion / Mass Wasting

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

Percentage of sale area with slopes  $> 50\%$ : approximately 28%

Maximum percent slopes: 90%

Steeper hillside is associated with karst bed rock formations in Unit 210.

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

#### F. Timber Harvest—Surface Water Protection

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

**Table 3. Protection for Known Surface Waters**

Unit	Waterbody Name	AS 41.17.950 Classification	ADF&G AWC #	Required Riparian Protection	Site-specific actions to minimize impacts on riparian area
1	Numerous unnamed	Surface Waters $> 12\%$	NA	Follow Best Management Practices (BMPS)	Split yarding, directional felling, removal of logging debris from waters
110	Several unnamed	Surface Waters $> 12\%$	NA	Follow Best Management Practices (BMPS)	Split yarding, directional felling, removal of logging debris from waters



Unit	Waterbody Name	AS 41.17.950 Classification	ADF&G AWC #	Required Riparian Protection	Site-specific actions to minimize impacts on riparian area
2	Numerous unnamed	Surface Waters >12%	NA	Follow Best Management Practices (BMPS)	Split yarding, directional felling, removal of logging debris from waters
3	Numerous unnamed	Surface Waters <12%	NA	Follow Best Management Practices (BMPS)	Split yarding, directional felling, removal of logging debris from waters

Note: All the above surface waters are proximate to the estuary area of cataloged stream 106-30-10850. ADFG visited the site 6/04/2025 and concurs with the represented classifications.

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

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

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

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

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

Notes:

## G. Wildlife Habitat

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

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

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

Notes:

- To the extent that safety permits, Snags and obvious cull trees without Dwarf Mistletoe may at the purchaser's discretion be left standing at a density of three per acre. The intent is to provide bat roosting and bird habitat. Cull western red and yellow cedar snags are preferred over western hemlock
- A 300-foot wide vegetated (timbered) corridor will be retained in Units 110 and 2 for a deer travel way. The corridor will be continuous between the west side of the unit and the undisturbed timber adjacent to the estuary on the east side of the units.

## H. Cultural and Historical Resource Protection

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

## I. Other Resources Affected by Timber Harvest and Management

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

**Table 4. Other Affected Resources / Areas of Concern**

Impacted Resource	Reviewing Agency	Impact/ Mitigation Actions
Safety	DOF	Public proximity/see notes

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

**Notes:**

Warning signs shall be posted where harvest activity such as falling, yarding, or trucking are occurring on or adjacent to the existing road system.

## J. Reforestation

Harvest type as it relates to reforestation requirement:

- ☒ Clearcut
- ☐ Region I: Partial Harvest leaving more than 50% live basal area (11 AAC 95.375(b)(3))

- ☐ Region II or III: Partial Harvest relying on residual trees to result in a stocking level that meets standards of 11 AAC 95.375(b)(4).

Season of harvest:

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

Regeneration type:

- ☒ Natural regeneration

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

- ☐ Coppice  
☐ Artificial regeneration  
☐ Seeding: Species and source of seed (general vicinity location of seed source)

- ☐ Planting: Species: \_\_\_\_\_ Date of proposed planting: \_\_\_\_\_  
Source of seedlings (location of seed source): \_\_\_\_\_

## IV. Roads and Crossing Structures

### A. Road Design, Construction, and Maintenance

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

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

**Table 5A. Road Reconstruction and Use**

Road ID	Segment	Harvest Unit	Mile**	Road Class	Constructed and Maintained By	Construction Objective
558	All	3	0.05	Spur	Purchaser	Reestablish a maintainable surface, drainage and clearing limits, refurbish turnouts
Total			0.05			

**Table 5B. New Road Construction and Use**

Road ID	Segment	Harvest Unit	Mile**	Road Class	Maximum Grade %	Constructed By	Maintained By
Loading Spur 1	All	1	0.09	Spur	18	Purchaser	Purchaser
Loading Spur 2	All	1	0.06	Spur	16	Purchaser	Purchaser
Total			0.15				

*Road Class is as defined in the DOF Road Standards.*

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

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

Notes: “Trucks Entering Highway” shall be posted near the junctions of active forest road systems and the existing USFS road systems when hauling rock or timber.

## B. Road Erosion / Mass Wasting

Maximum percent side slopes of roads: 20%

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

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

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

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

**Table 6. Road Erosion Control Risk and Mitigation**

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

## C. Crossing Structures

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

☐ No crossing structures are needed within the project area.

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

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

Road ID	Segment	Mile/ Station or Point Label	Bridge Length (ft.) or Culvert Diameter (in.)	Structure Type	AS 41.17.950 Stream Classification	ADF&G AWC Number	Duration of crossing structure in place
L.S. #1	1	0+20	18"x30'	CPP	Ditch	N/A	Close of Timber Sale
L.S.#1	2	2+00	24"x30'	CPP	Less than 12% Tributary	N/A	Close of Timber Sale

Road ID	Segment	Mile/ Station or Point Label	Bridge Length (ft.) or Culvert Diameter (in.)	Structure Type	AS 41.17.950 Stream Classification	ADF&G AWC Number	Duration of crossing structure in place
L.S.#2	1	0+20	18"x30'	CPP	Ditch	N/A	Close of Timber Sale

#### D. Road Closure

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

**Table 8. Road Closures**

Road ID	Segment	Unit	Closure Type All Season/Winter	Estimated Closure Date	Projected Road Use after Timber Harvest
Loading Spur 1	All	1	FRPA Closure	End of Sale	None
Loading Spur 2	All	1	FRPA Closure	End of Sale	None
558	All	3	FRPA Closure	End of Sale	None

#### E. Material Extraction

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

#### F. Other Resources Affected by Roads or Material Extraction

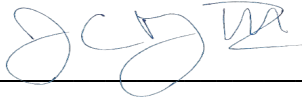
List resources other than water, habitat or cultural resources potentially impacted by road construction, and indicate how impacts will be mitigated. Other affected resources could be, but are not limited to mining claims, scenic areas, recreational trails, etc.

**Table 9. Other Affected Resources**

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

## V. Approvals

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



\_\_\_\_\_  
Commissioner  
Department of Natural Resources

9.11.2025

\_\_\_\_\_  
Date



## **VI. Reconsideration**

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

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

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

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

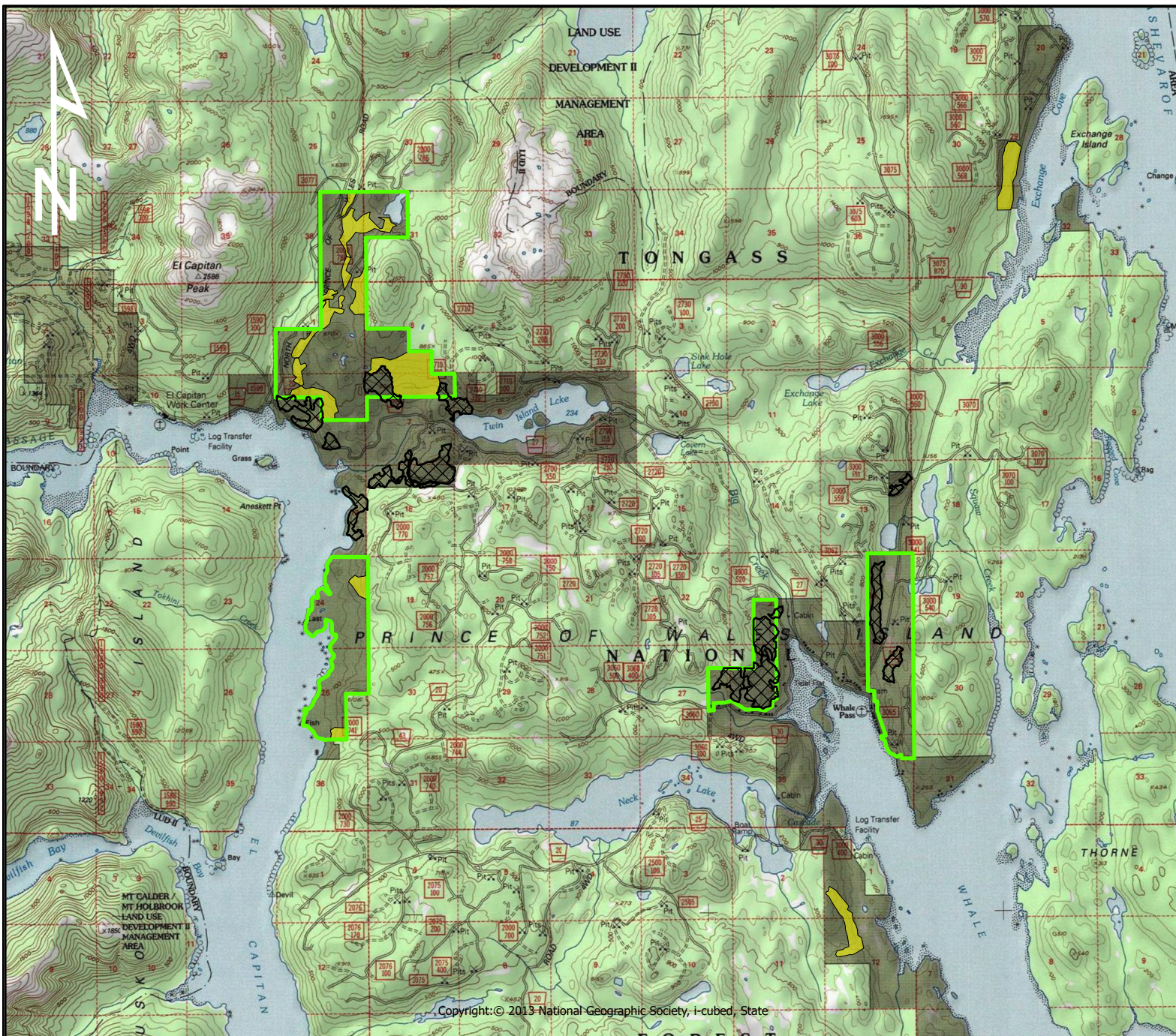
If you have any questions, please contact the Southeast Area Office at (907) 225-3070 or e-mail [dnr.dof.sse@alaska.gov](mailto:dnr.dof.sse@alaska.gov)

***Appendix A: Timber Sale Maps***

Appendix A1 Vicinity Map (1 page)

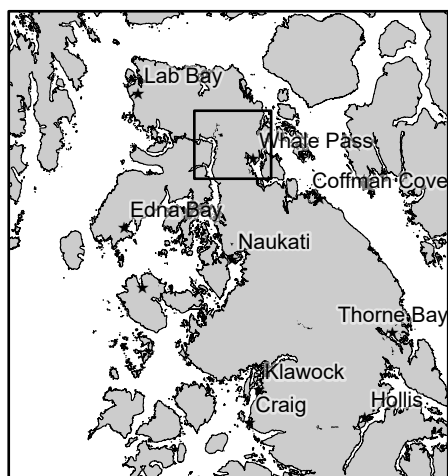
Appendix A2 Unit Map (1 page)



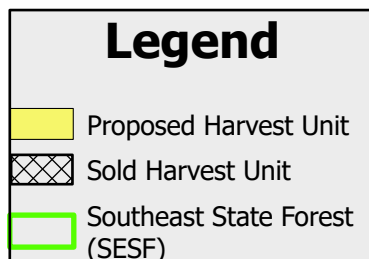


0 0.5 1 2 3 4  
Miles

Area Map 1 in = 1.6 Miles



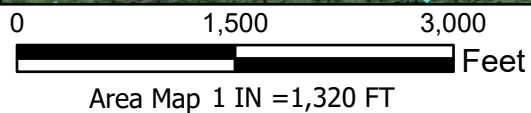
Vicinity Map 1 in = 32 miles



## APPENDIX A1 SSE-1391-K ODYSSEY TIMBER SALE AREA MAP



















**APPENDIX A2**  
**SSE-1391-K**  
**ODYSSEY TIMBER SALE**  
**EXCHANGE COVE SUBUNIT 1B**



- ### Legend

-  Cable Setting  
 Ground Based Yarding  
 Deer Corridor  
 Proposed Road  
 Landing

## Streams

-  General Water Quality  
 Water Quality Class D  
 Water Quality Class C  
 Cataloged Anadromous  
 Non Cataloged Anadromous  
 Resident Fish  
 Property Line

## ***Appendix B: Supporting Information***

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

### **Alaska Forest Practices and Regulations.**

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

### **Forest Road Standards.**

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

## ***Appendix C: Appeal Statutes and 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: DRAFT FLUP Public Comment***

# Draft Forest Land Use Plan Odyssey/Exchange Cove Timber Sale (SSE-1391-1)

## Comments

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

The following commenters submitted input:

- Tommaso Shellfish, James Greeley and Katie Bodie
- Southeast Alaska Conservation Council, Policy Analyst, Tyler Breen

The following comments were received during the public comment period on the Draft Forest Land Use Plan for the Odyssey Exchange Cove Subunit Timber Sale (SSE-1391-1) and are organized based on the topic structure of the Draft Forest Land Use Plan.

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<b>Draft Forest Land Use Plan</b>		
	<b>I. Introduction</b>	
	<b>III. Harvest Methods, Silvicultural Actions, and Management of Nontimber Resources</b>	
	<b>B. Timber Harvest Activities</b>	
Tommaso Shellfish, James Greeley and Katie Bodie	The FLUP raises concern by favoring clearcut units rather than more wildlife-friendly selective harvest methods.	The decision to harvest the area by clearcut was made in the BIF. Noted, no change required.
Tyler Breen SEACC	Reduce the Old-Growth Harvest Volume: The Division should not proceed with the proposed 107-acre clearcut as planned. This sale should be substantially reduced in size or converted to a partial-cut prescription that retains a meaningful portion of the old-growth stand structure. Retention should include all trees in gullies and on steep or dissected slopes, as well as a proportion of dominant, large-diameter trees within each unit, to preserve canopy complexity, wildlife habitat, and long-term site productivity.	
Tyler Breen SEACC	Focus on Second-Growth and Restoration Forestry: The State should prioritize management of young-growth stands on Prince of Wales Island rather than continuing the liquidation of remaining old growth. Supplying mills through second-growth harvest—supported by investments in thinning, longer rotations, and stand improvement—offers a more sustainable path and positions the industry for long-term viability, avoiding the economic and operational disruption that will result from a rapid decline in old-growth availability. SEACC recommends that the Division develop a clear timeline to transition Viking Lumber and other operators to a predominantly second-growth supply, consistent with the transition strategy already adopted on federal lands in the Tongass. In the Exchange Cove area, previously logged stands are maturing and present opportunities for pre-	

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	commercial thinning or small-gap harvests that improve both timber quality and wildlife habitat. Rather than removing 107 acres of old growth, the Division could substitute nearby 40–60-year-old stands on state land ready for a first thinning entry, providing marketable timber—albeit of smaller size—while enhancing growth, understory recovery, and long-term forest productivity.	
	<b>E. Soil Stability/ Erosion/ Mass Wasting</b>	
Tommaso Shellfish, James Greeley and Katie Bodie	Logging or road construction on steep terrain significantly increases the risk of slope failure, erosion, and downstream impacts.	The steeper site slopes classified are the exposed karst bedrock on the west side of the sale on the cable settings. There is low soil movement potential from bedrock as there is no significant soil present. Best management practice will be implemented to maintain back stability on the lower reaches and remove incidental logging debris from surface waters. The risk to water quality and fisheries is low. No change required.
Tyler Breen SEACC	Portions of the Exchange Cove sale area may include steep slopes or unstable terrain, which pose heightened risks of landslides and sedimentation if logged or roaded improperly.	
Tyler Breen SEACC	Slope Stability and Erosion: FRPA explicitly requires that timber operations “prevent or minimize significant adverse effects of soil erosion and mass wasting on water quality and fish habitat”. It also says state timber harvests must not “significantly impair the productivity of the land and water” for renewable resources. These standards are legally enforceable and directly relevant to logging on steep slopes or unstable soils in Exchange Cove.	
	<b>F. Timber Harvest – Surface Water Protection</b>	
Tyler Breen SEACC	Streams and Fish Habitat: Prince of Wales Island is interlaced with streams that sustain salmon, trout, and char populations essential for both ecological function and community subsistence. The Exchange Cove FLUP acknowledges the presence of fish streams in Annex 2, but the maps provided do not fully identify or display the extent of anadromous waters within the sale area. This omission limits the analysis of potential impacts to fisheries. According to the Alaska Department of Fish & Game’s Anadromous Waters Catalog (AWC 2025), Exchange Creek (AWC Code 106-30-10850) supports Chinook (CHp), Coho (COpr), Pink (Pp), and Dolly Varden (DVp). Additional nearby	The Appendix A2 Unit Map depicted known surface waters within and adjacent to the subject FLUP timber sale unit. The one anadromous stream symbolized in the view frame has been labeled (106-30-10850). The two other streams noted in your comment will be depicted as appropriate in the FLUPs covering those areas in the future. The surface waters in the timber sale unit have been classified by DOF; the ADF&G Habit Office visited the site and concurred with the classification. There are no known fish streams in the timber sale unit. FRPA best management practices have been prescribed in the FLUP and the contract.

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	<p>waters include Turn Creek (AWC Code 105-42-10100) with Chinook, Coho, Pink, and Steelhead (SHr), as well as Twin Island Lake (AWC Code 106-30-10800-0020) which supports Coho. These waterbodies demonstrate that the proposed sale area poses significant risk to known anadromous systems and important salmonid habitat.</p> <p>Logging in proximity to these streams risks sedimentation, hydrologic alteration, and the loss of riparian cover that regulates water temperature and nutrient input. Under the Forest Resources and Practices Act (FRPA), anadromous and high-value resident fish streams require a minimum 100-foot riparian buffer, while non-fish-bearing tributaries may require 50–100 feet of protection depending on slope and site conditions (11 AAC 95.260–270). However, these are statutory minimums. Given the cumulative logging history in northern Prince of Wales, and evidence of past harvests near Whale Pass that already degraded salmon streams and surface waters, Exchange Cove warrants stronger safeguards. SEACC recommends:</p> <ul style="list-style-type: none"> <li>• No-harvest buffers of at least 150 feet along all Class I (anadromous) streams, including Exchange Creek, Turn Creek, and tributaries flowing into Twin Island Lake.</li> <li>• Protection for Class II streams and tributaries under FRPA, with expanded widths where slopes are steep or soils prone to erosion.</li> <li>• Special Management Zones of up to 300 feet in high-value or interconnected reaches, to ensure bank stability, filtration of fine sediments, and thermal protection for salmon.</li> </ul>	
Tyler Breen SEACC	<p>Enhance Riparian and Karst Buffers: SEACC recommends establishing protective buffers that exceed FRPA minimums in environmentally sensitive areas. In Region I, FRPA riparian management areas for anadromous and high-value resident fish waters extend 100 feet from the ordinary high-water mark, with a no-cut zone adjacent to the stream and a special management zone beyond (11 AAC 95.265). At Exchange Cove, the Division should:</p> <ul style="list-style-type: none"> <li>○ Apply no-harvest buffers of at least 100 feet—and preferably 150 feet—on each side of all fish-bearing and key tributary streams to maintain shade, large woody debris recruitment, and</li> </ul>	<p>The best management practices of the FRPA will be implemented and have a track record of maintaining water quality, soil integrity, and fish habitat. Cutting the timber east of the road other than for the limited safety clearances of the landings is not proposed in this FLUP.</p>

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	<p>bank stability.</p> <ul style="list-style-type: none"> <li>○ Maintain no-entry buffers around all known karst features, such as caves, sinkholes, and significant limestone springs, to prevent sedimentation and hydrologic alteration. The FLUP's acknowledgment of karst limestone in Unit 210 underscores the need for these protections.</li> <li>○ Retain a continuous beach fringe buffer along the shoreline of Exchange Cove to safeguard slope stability, prevent erosion, and maintain scenic quality.</li> </ul> <p>These enhanced measures would better protect fish habitat, water quality, and the unique karst hydrology, preserving ecological integrity even if upland harvest proceeds. They would also protect other local economic activities dependent on clean, stable nearshore environments—such as oyster aquaculture, which requires multi-year site investment and can be irreparably damaged by increased sedimentation from near-shore logging.</p>	
	<b>G. Wildlife Habitat</b>	
Tyler Breen SEACC	<p>The cumulative removal of old growth on POW has already contributed to deer population declines in some areas. Importantly, Game Management Unit 2 (POW Island) is federally recognized (under ANILCA Title VIII) as a subsistence-use area where deer hunting by local rural residents is given priority. If habitat loss from state actions further depresses deer numbers, it could trigger restrictions on hunting or hardship for communities like Whale Pass and Coffman Cove that rely on venison. The FLUP should analyze how the Exchange Cove sale will affect deer winter range and carrying capacity. Remaining old-growth patches near the beach and valley bottoms are particularly crucial for deer survival in severe winters. From a regulatory standpoint, while state projects are not subject to federal subsistence oversight, the spirit of ANILCA demands that state land management consider subsistence needs. Deer, salmon, and halibut are among the most consistently important wild foods for Southeast Alaskan communities. Thus, the loss of deer habitat here directly translates to impacts on local food security and traditional lifestyles. Any mitigation (such as leaving unlogged</p>	<p>The DOF consulted with ADFG on wildlife habitat retention; the BIF comment recommended the retention of a travel corridor in this planning subunit. As depicted on the Unit Map, the DOF will implement the recommended deer travel corridor.</p>



Commenter	Comment	Response
	deer travel corridors or reserving some high-value stands) would help reduce this impact.	
Tyler Breen SEACC	...continued short-rotation clearcut logging is expected to place wolf populations at risk, especially in GMU 27.	ADF&G has not indicated that there is site specific importance for the species referenced. Comment noted, no change required.
Tyler Breen SEACC	Maintaining some old-growth corridors and reserve patches within the sale area would help provide squirrel habitat and connectivity.	
Tyler Breen SEACC	The comment letter should urge the Division of Forestry to consult any murrelet survey data and consider seasonal timing restrictions (avoiding disturbance during nesting season) or retaining some veteran nest trees.	
Tyler Breen SEACC	Other Species: Additional sensitive species on POW include the Queen Charlotte Goshawk (a rare subspecies of northern goshawk), which requires large territories of old-growth for hunting and nesting; the Prince of Wales Spruce Grouse (endemic subspecies), which uses forest edges and openings but still needs adequate habitat mosaic; and salmonids (various salmon and trout species) in the streams. All these species are part of an interconnected web that old-growth ecosystems support. Fragmentation and simplification of the forest through clearcut logging can lead to cascading effects (e.g., reduced prey base for raptors, warmer streams with fewer salmon, etc.).	
	<b>I. Other Resources Affected</b>	
Tommaso Shellfish, James Greeley and Katie Bodie	If implemented as clearcuts, cumulative impacts with nearby past cuts must be considered – widespread logging since the 1960s around Whale Pass has already stressed property values, salmon streams, wildlife, and water quality. Ignoring these cumulative effects contradicts forest stewardship and multiple-use principles that Alaska is mandated to uphold.	Article VIII—5. Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses. Preferences are applied when known through land classification.
Tyler Breen SEACC	Multiple Use and Sustained Yield: The Alaska Constitution (Article VIII) and FRPA (AS 41.17.060 & .200) require that state forests be managed under the principles of sustained yield and multiple use. Sustained yield means not liquidating resources in a way that forecloses future use, and multiple use means balancing timber with other values like wildlife, recreation, and subsistence.	AS 38.05.300. Classification of land. “The commissioner shall classify for surface use land in areas considered necessary and proper. This section does not preclude reclassification where the public interest warrants reclassification, nor does it preclude multiple use purpose use of land whenever different uses are compatible.”

Commenter	Comment	Response
		<p>Land classified (by the commissioner) as General Use has no identified preferred use. Activities such as forestry are considered appropriate.</p> <p>State land is a very small portion of the land on POW Island. During the development of the DNR POW Island Area Plan and associated land classification, cumulative impact was considered, as was the land classification and proposed activity on the federal land base as portrayed in the Tongass Land Management Plan. State lands within the planning period were considered likely to be developed. Timber activity and other development on federal lands has generally been less than identified in the TLMP.</p> <p>The DOF is using public land and resources in the southeast area that it has identified in this classification process as eligible to meet the timber demand. The DOF typically sells less than its annual allowable cut on lands identified as requiring a sustainable harvest.</p>
Tyler Breen SEACC	<p>Karst Considerations: The Exchange Cove area lies in the karst-rich landscape of northern POW Island. Karst is characterized by soluble limestone geology with caves, sinkholes, and underground drainage. This terrain is both highly productive for big-tree forests and extremely sensitive to disturbance. Karst forests often have thin soils over cavernous bedrock, meaning that heavy equipment or road building can collapse cave roofs or alter groundwater flow. Notably, over two-thirds of the productive forest on central POW's karst lands has already been logged, compared to about one-third on non-karst lands – indicating intense past logging pressure on these rich sites. If the Exchange Cove units include karst features (e.g. sinkholes, known caves, or extensive limestone outcrops like nearby Beaver Falls Karst area), special management is crucial. The U.S. Forest Service's Tongass Plan identifies high-vulnerability karst that should be buffered from harvest. At minimum, no logging or road fill should occur in sinkholes or within a specified distance of cave entrances, and natural drainage paths should remain intact. Logging on karst without such safeguards risks degrading underground streams and</p>	<p>The DOF described the karst bedrock on the west side of the subunit and the emergent surface waters in the BIF. The DOF has not observed significant karst features that appear to be vulnerable to impacts of the logging or roadbuilding. Existing stream courses, bed conditions and banks will be maintained during operations.</p> <p>State of Alaska Office of History &amp; Archaeology had an opportunity to review and provide feedback during the planning process, and no concerns were expressed about this sale area.</p>

Commenter	Comment	Response
	cave habitats (which often harbor unique fauna) and could even violate FRPA’s mandate to prevent significant adverse effects on water quality. Moreover, karst landscapes hold cultural and paleontological resources (e.g. ancient bones, archaeological sites in caves) that could be irreparably damaged by ground disturbance. We urge that the FLUP address any karst present and outline measures (or exclusions) to protect this sensitive environment.	
Tyler Breen SEACC	Subsistence gathering of berries, medicinal plants, and cedar bark in the area would also be affected by the removal of old stands. In sum, the Exchange Cove sale’s effects on wildlife and subsistence resources are a central concern, demanding careful analysis and meaningful mitigation (e.g. leaving buffer strips for travel corridors, excluding crucial habitat areas, seasonal restrictions, etc.).	The ADF&G did not indicate important habitat or subsistence values on the timber sale. However, they did indicate that “taken together with the other timber harvest that has occurred within GMU 2, the cumulative effects of timber harvest on deer populations may be significant”. Consequently, ADF&G requested and DOF specified a wildlife travel corridor of retained timber between the road and tidewater in the unit to mitigate impacts. Comment noted, no change required.
Tyler Breen SEACC	If a state action such as the Exchange Cove timber sale diminishes deer habitat and reduces deer abundance, it directly threatens subsistence opportunities. This not only conflicts with state subsistence policy but also undermines ANILCA’s objectives by creating pressures that federal managers may need to address by tightening harvest limits on adjacent federal lands.	Comment noted, no change required.
Tyler Breen SEACC	Protect Subsistence Values – Mitigate Wildlife Impact: As a condition of the sale, SEACC recommends that the Division require full decommissioning of temporary logging roads following completion of harvest operations, with measures such as waterbars, cross-drainage, and gates to restrict vehicle access. This will help reduce new hunting and trapping pressure that can negatively affect subsistence resources in GMU 2.	The DOF is planning to close the spurs at the end of harvest.
Tyler Breen SEACC	Seasonal timing restrictions should also be implemented: avoid timber felling during July–August, when deer are rearing fawns and subsistence hunters are scouting, and avoid the spring nesting period for migratory birds (May–June).	Comment noted, no change required.
Tyler Breen SEACC	If harvest results in substantial loss of deer winter habitat, require compensatory measures such as intentional thinning in adjacent young-growth stands to promote forage production. While these measures cannot replace lost old growth, they can help offset	The DOF is precommercial thinning at several locations on POW Island. Comment noted, no change required.

Commenter	Comment	Response
	some impacts.	
Tyler Breen SEACC	SEACC also urges incorporation of post-harvest wildlife monitoring—such as deer pellet counts or wolf track surveys in collaboration with ADF&G—to assess effects and adapt future management accordingly.	ADF&G regularly conducts wildlife surveys on POW Island for deer and wolf populations.
Tyler Breen SEACC	Consider Economic and Community Alternatives: Before finalizing this sale, SEACC urges DoF to reassess whether this large clearcut sale is in the best interest of Alaskans. Alternatives could include splitting the sale into smaller units to offer to local operators (firewood cutters, small sawmill owners) which might generate more local employment per board-foot than a single operator clearcut. Another alternative: delay the sale until second-growth stands are more ready, using the interim to develop a value-added industry (e.g. greater use of small-mill value-added processing, producing finished wood products) that doesn't depend on old-growth. Designate a portion of the volume specifically for local use (e.g., specific designation for local housing framing or reserved cedar for Indigenous cultural use). Such alternatives should balance a measure of ecological loss with community benefit, rather than liquidation export as unprocessed round logs.	The BIF premise of this sale is to utilize underutilized timber to supply the remaining timber industry in Southeast Alaska. The decision to sell this timber has already been made. Comment noted, no change required.
Tyler Breen SEACC	Past analysis suggests many state timber sales in SE are marginal or net-loss economically, so exploring measured micro-sales with value-added processing and non-timber alternatives for local economic development (like carbon market trading - as authorized under AS 38.95.400 - AS 38.95.499) would be a wiser long-term investment.	Carbon market trading is not an option on state lands until the respective land management plan is amended.
	<b>J. Reforestation</b>	
Tyler Breen SEACC	Additionally, reforestation requirements under FRPA (to ensure the land regenerates after logging) are pertinent; although Region I relies on natural regen (no mandatory planting), the slow growth of cedar and deer browse impacts mean the site may not adequately restock or reach equivalent productivity for centuries.	The DOF does not expect reforestation to be an issue based on experience with similar sites. The DOF will assess regeneration and act as required to meet FRPA reforestation requirements.
	<b>IV. Roads and Crossing Structures</b>	
	<b>B. Road Erosion / Mass Wasting</b>	
Tyler Breen SEACC	If the Exchange Cove FLUP or subsequent plans do not reflect such precautions, it could be grounds for objection. FRPA	The roads on the subunit are overall on slopes less than 50% and generally less than 20%. Unstable areas were not observed.

Commenter	Comment	Response
	<p>regulations (11 AAC 95.290) require techniques like full-bench road cuts, end-hauling of sidecast, not placing fill on unstable slopes, and avoiding road construction during saturated soil conditions to avert slides. SEACC insists the Division of Forestry rigorously apply these FRPA slope and sediment safeguards – or avoid steep areas entirely.</p> <p>Implement Strong Erosion Control and Slope Safeguards: If harvest or road construction occurs on steep or unstable ground, the Division must fully comply with FRPA slope standards in 11 AAC 95.290, including:</p> <ul style="list-style-type: none"> <li>○ Avoidance requirement – Roads and operations should be avoided on slopes greater than 67% or on unstable slopes unless no feasible alternative exists (11 AAC 95.290(a)).</li> <li>○ Site-specific measures – If unavoidable, implement Division-approved, site-specific measures to maintain slope stability and prevent mass wasting (11 AAC 95.290(b)).</li> <li>○ Saturated soils prohibition – Prohibit excavation or blasting in saturated soils where mass wasting is likely, and cease operations during heavy rainfall (11 AAC 95.290(b)(3)).</li> <li>○ Construction practices – Use full-bench construction with end-haul of excavated material; prohibit side-casting of fine-grained soils (11 AAC 95.290(c)).</li> <li>○ Soil stabilization – Promptly stabilize exposed soils through seeding, mulching, or other effective means (11 AAC 95.290(d)).</li> <li>○ These requirements should be incorporated directly into the final FLUP and timber sale contract, with on-the-ground verification and active oversight to ensure compliance.</li> </ul>	