

## Issue Response Summary on Public Review Draft of Southeast State Forest Management Plan

Commenter / Agency		Date Rec'd	Topics or Issues	Notes X indicates material added to final draft
1	Brett Hiatt, SSRAA Southern Southeast Regional Aquaculture Association	3/23/15	Questions: Are any near term timber sales planned in the Neets Bay Unit? SSRAA will be consulted if sale planned in area?	Met with in person April 14 <sup>th</sup> . Answered questions: "No; Yes"
2	Greg Staunton, DOF Division of Forestry	3/26/15	Add discussion of Transportation Corridors to Chapter 2; and in Chapter 3, Vallenar Unit, designate a Transportation Corridor per PBIF	X Added
3	Mark Manillo, ADF&G	4/3/15	Add: AWC numbers to streams; scenery provisions; update maps w/ 2015 AWC info to correspond to Unit cards; add Title 16 to page 32	X added numbers X updated maps X Title 16 added X Scenery on unit cards
4	Owen Graham, Alaska Forest Association (AFA)	4/16/15	Supports: State's timber sale program and its expansion; adding 2 million acres to SESF; more land-owner coordination. Logging roads greatly increased recreation access. Timber harvesting coexists well with fish and wildlife.	Noted support
5	Kevin Hanley, DEC Dept. of Environmental Conservation	4/22/15	Ensure protection of source waters for public drinking water supplies of Thorne Bay & Coffman Cove; recommend site-specific unit cards be added to all FLUPs, plus add proposed mitigation measures for identified concerns on unit cards	X Water supply concerns added to unit cards; mitigation addressed during FLUP step
6	Carl Portman, RDC Resource Development Council	4/23/15	Pleased with DOF's "working forest" approach & active management; supports increasing size of state forest + adding adjacent tidelands and submerged lands; commends coordination among various timberland owners for timber sales and transportation should continue; state lands provide stable supply of timber to local mills while waiting for more 2 <sup>nd</sup> growth harvests; other industries (tourism and fishing) coexisted with timber when that industry was larger in SE. Second-growth stands within the SESF should be actively managed to provide for more timber on shorter rotations.	Comments supportive of plan; no change
7	Sharon Brosamle	4/24/15	Letter addressed TLMP and Tongass; not SESF	No action needed
8	Sharon Brosamle	4/25/15	SESF MP: commenter supports multi-use; allow	Supports multiple use

	(Klawock resident)		logging; keep roads open for public subsistence gathering, hunting & recreation	and logging; No change to plan
9	Stephen Todd (Wrangell resident)	4/26/15	Supports local Allen Mill, and DOF timber sales on the scale that supply local mills on Wrangell Island, from Wrangell Island. Concerned with development of Crittenden Unit because: costs to State outweigh benefits to community, exports not beneficial to Wrangell; impacts on hunting/fishing; how can State afford to maintain new roads? Will closed roads affect water quality of salmon streams? Crittenden Creek has excellent fall coho fishing; Babblers Point (proposed LTF) a King salmon troll area. Deer need winter habitat (OG); viewshed quality is important to thousands of tourists & outfitters traveling to Anan Creek Wildlife Viewing Site or Mill Creek State Park. Local trappers use lower Crittenden watershed; public best served when DOF provides timber at appropriate scale for local mills from SESF.	Anan Creek Site is located 25 air miles SSE of Crittenden Creek Unit; while Mill Creek State Park is adjacent to the southern end of the Unit.  <u>X</u> Revised Unit Cards per Crittenden Creek and other inputs
10	Brian S. Brown (On-Line Comment Form)	4/26/15	Supports creation of SESF; and state offering more timber sales	No change to plan
11	Keith Appleman (Wrangell resident)	4/26/15	Commented on Wrangell Management Area: ok with supplying local mills from units on road system. Major concern with proposals for Crittenden Unit: Babblers Point area by proposed LTF is heavily used king salmon sport fishery; Back Channel is heavily used by boaters. Important wildlife, fishery, scenic & local use values outweigh value of large scale clear-cuts on Crittenden; opposes timber sales in Crittenden or other undeveloped areas. Feels state unable to afford to maintain a forest road system. Wrangell trappers use Crittenden area.	<u>X</u> Babblers Point area by proposed LTF is heavily used king salmon sport fishery; & Crittenden trapping added to unit card
12	Derek Thynes (On-Line Comment Form) (Petersburg resident)	4/26/15	Supports Mitkof timber sale – will enhance area’s wildlife and economy. Timber harvests with buffers enhance big game habitat if done right.	No change to plan
13	Haig & Bonnie Demerjian (Wrangell residents)	4/27/15	Concerned with expanding industrial logging in Wrangell Area- especially on Crittenden Unit. Support local mills and sales that benefit local communities. Tourists visiting Stikine River may object to clear cuts; reportedly there are petroglyphs located along the creek [Crittenden or	<u>X</u> Checked AHRS; note added to Unit Card for Crittenden Creek

			Anan?]	
14	Peter Branson (Wrangell Island resident)	4/29/15	Crittenden Creek Unit has outstanding fish and wildlife values; prefer tourism uses over clear-cutting of unit; suggests putting in trails and campsites in Crittenden instead of logging. Supports small sales on existing road system for small mills	No change to plan; <u>X</u> values noted in Unit card
15	Victoria McDonald Tongass Conservation Society, Ketchikan	4/29/15	..."management for recreation, fish viability and scenic viewsheds are ignored on State lands." "Local residents can access only small amounts of locally cut wood." "The 100 year [rotation] estimate is most likely an optimistic estimate." "Roads create erosion for many years after construction, in addition to fouling salmon streams." ..."State parcels contribute greatly to the overall disintegration of the Tongass." ..."protests further cutting in our forest."	No change to plan.  DOF will continue to sustainably manage the relatively small SESF for timber and other multiple uses.
16	Tyler Poelstra (Edna Bay resident)	4/30/15  2 emails	Commented primarily on area of SESF within the Edna Bay municipal boundaries. Supports 'working forest' concepts that benefit local community and requests timber management and harvest be extended to provide a long-term presence near community; and make this a goal within the plan. Requests a 300' shoreline buffer within Edna Bay in the south and SW units; partly to mitigate impacts of winds. Requests mitigation or design of timber harvests to minimize impacts on scenic viewsheds. There are mapped eagle trees in the East and South Units to document. Requests more detail in plan on providing small timber sales and personal use permits that support the needs of this isolated community. Requests round log export be limited or removed from the plan; keep this local resource in the region. Requests more detail in plan on how stand management, especially among multiple landowners, will take into consideration important wildlife habitat, such as travel corridors. Requests no harvest in areas west of Survey Creek.  Supports more public land or UA land be transferred to SESF; include Edna Bay in such discussions.	<u>X</u> Coordinated timber sales to support community economies where feasible;  <u>X</u> Scenic buffers identified on Unit cards  <u>X</u> Eagle trees are present throughout coastal areas of SESF.

17	David B. Randrup (Petersburg resident)	4/30/15	<p>SESF plan fails to mention the Petersburg Comprehensive Plan update of February 2015 or input from the Petersburg Indian Association. South Mitkof Island has deer winter habitat and is an important community harvest area.</p> <p>Timber harvests on Frederick Point (890 acres) will eliminate corridors to beach fringes from 3 distinct hillsides, and severely impact deer survival.</p> <p>Main concern is DOF maintaining fish and wildlife resources that support subsistence activities; consult with ADF&amp;G and DEC on effect of proposed harvest on water quality and fish and wildlife habitat.</p>	<p><u>X</u> Added mention of the Draft Petersburg Borough Comprehensive Plan Update that is under development during 2015.</p> <p>DOF consults with ADF&amp;G and DEC during the timber sale planning process to avoid or mitigate impacts on other resources.</p>
18	Karl Hagerman Petersburg Borough, Public Works Director	4/30/15	<p>(Comment related to Mitkof FYSTS) Northern sale location of Frederick Point timber sale is in area of Borough road and water supply pipeline.</p> <p>The Cabin Creek Reservoir is Petersburg's primary water source; and the water supply pipeline (20" dia. HDP pipe) delivers water to the treatment plant approximately 6.5 miles north of the reservoir. The Borough seeks assurance that timber sales or operations on the northern sale location of Fredrick Point Unit will not have an adverse impact to existing road conditions or the water pipeline or its air release vaults that is parallel to the road.</p>	<p><u>X</u> Presence of key water supply pipeline by Fredrick Point added to unit card.</p> <p><u>X</u> SESF Plan uses "Frederick" spelling throughout.</p>
19	Mike Sallee (Ketchikan resident)	4/30/15	<p>Emailed comments + 2 older letters provided (1993 &amp; 2014). "The fatal flaws with clearcuts: Cavity-nesting birds and mammals are displaced immediately and permanently; [etc.]" p. 2: "Clearcut logging should be reserved as a last resort option to deal with massive insect outbreaks and other stand-threatening events, not as a means to make timber sales economically viable."</p> <p>"There should be no round log export of timber from State Forests." Should tailor sales to needs of small local wood processors, or leave the trees standing.</p>	<p>Note: Set aside Riparian Buffers, other unharvestable or unharvested areas, and normal rotational periods all contribute to meeting wildlife habitat needs.</p> <p>Timber harvests from state lands are tailored to meet a range of industry needs, from local to export.</p>

20	Paul Olson Greenpeace, Sitka	4/30/15	Mr. Olson provided via email pdfs of 12 references on forestry to include as part of combined SEAAC submission.	Noted
21	Rebecca Knight (Petersburg resident)	4/30/15	<p>Opposed to any more old growth logging in area or on Mitkof Island. “[F]ailure to adequately notify the public of hearings...” The recent 2013-17 FYSTS appears to exceed annual allowable cut. State Forest lands on Mitkof include winter range for deer; deer populations are low. Local hunters rely on local deer. Scheduled timber sales do not appear to take into account predator control for wolves and low bag limits for deer. “Please defer logging in these tracts important to wildlife [southern coastal fringe wildlife movement corridors and areas of main wildlife concentrations]. Landslide risks are increased by 5x on logged unstable slopes. Southeast winds from Sumner Strait may impact southern slopes by the Woodpecker Unit; no further logging should take place here. Plan does not mention landslide risks at South Mitkof &amp; Favor Peak cited by the Landslide Science and Technical Committee. Consider the Green’s Creek/Ernie Haugen Public Use Camping Area; do not cut any old growth here, as logging “will destroy the natural setting” of the camping area; same considerations for Fredrick Point North &amp; South Units. Protect known goshawk nests by Fredrick Point by the Cove in the Woodpecker Unit.</p>	<p>Intent to hold April hearings was publicly noticed on March 9<sup>th</sup>; specific dates via Online Public Notice &amp; DOF webpages April 8<sup>th</sup>; Press release April 9<sup>th</sup>. Email of meeting schedule sent to contact list April 10<sup>th</sup>.</p> <p><u>X</u> Potential for slides on steep slopes added to South Mitkof Unit Card.</p> <p><u>X</u> Haugen Public Use Area added to South Mitkof Unit Card.</p> <p>These concerns are normally addressed during the timber sale planning process and by consultations with ADF&amp;G at that time.</p>
22	Heather Richter, Mayor City of Edna Bay	4/30/15	<p>The City is selecting municipal entitlement lands in the vicinity of the proposed LTF and is seeking a long-term easement and cooperative agreement with DOF. Urges DOF to cooperatively manage lands with other entities to ensure water quality and to protect wildlife corridors; further assess west side of Survey Creek as a ‘critical wildlife habitat area.’ Due to isolation of Edna Bay, important for DOF to provide a means for local residents to access material sites within the State Forest. Prefers DOF manage the area’s forest units to provide a more stable, long-term economic base for the community. Scenic quality is a frequent local concern regarding future logging; consider retaining substantial shoreline buffers</p>	<p>Consulted with ADF&amp;G about Survey Creek; not critical habitat, though it is a catalogued fish stream shown on Unit Card.</p> <p><u>X</u> Include scenic quality consideration to community view shed on Unit Cards Edna Bay (shoreline buffers).</p> <p><u>X</u> community access to SESF material sites</p>

			within the community's view shed.	added to Chap. 2.  <u>X</u> Chapter 2 mentions coordinated timber sales to support communities.
23	Eric Lee (Petersburg resident)  Also oral testimony 4/15	4/30/15	Boom and bust resource extraction by out-of-state companies/workers who export the logs does not benefit Alaskans in the long run. Requests Mitkof Island become a model of sustainable forest management for harvesting specialty woods only. SESF lands include winter range habitat for deer on Mitkof needed by deer. "The 60 to 80 year rotation schedule... will not even come close to the time required to maintain the forests and wildlife in a sustainable way." Harvesting this old growth will violate wildlife protection guidelines. Requests yellow cedar on Mitkof be managed to ensure their survival; since it is one of the most valuable woods in our forests.	Note: DOF takes community concerns into account during the multiple step timber sale planning process.  DOF will continue to consult with ADF&G during timber sale planning to address deer habitat or other wildlife concerns.  DOF is managing yellow cedar and the forest in a sustainable manner.
24	Carleigh Fairchild (Edna Bay resident)	4/30/15	Request shoreline buffers be added to Edna Bay South and East Units to protect viewshed and provide a wind gust buffer for Edna Bay.  Add western side of Survey Creek as critical winter deer habitat, not harvest this side of creek, and note presence of eagle trees in Edna Bay East Unit.  Requested a goal be added to include a cumulative impact assessment from all harvest activities (past/present, & future) and insure adequate wildlife corridors and winter habitat for all species prior to harvesting timber.  Timber sales should primarily benefit in-state manufacturers; not be just for export or to the benefit of a few stake holders.	<u>X</u> Unit cards edited.  <u>X</u> Noted on unit cards.  Consultations with ADF&G during timber sale planning address these types of issues.  DOF actively seeks community benefits from timber management.
25	Jeff Jabusch, Borough Manager, City and Borough of Wrangell	4/30/15	Need to recognize recreational activities that take place at Earl West Cove Unit due to LTF and the adjacent established camping area.  Borough requests DOF confer in person during	<u>X</u> Added to Unit Card.  <u>X</u> Timber sale coordination with

			<p>timber sale planning to identify and minimize potential conflicts and maximize benefits of coordination when borough lands are nearby.</p> <p>Plan should allow various levels of forest road maintenance [short of full closure] to allow for public access, especially when the road provides economic or social benefits to nearby communities and no environmental issues exist if road uses continue.</p> <p>CBW requests DOF consider working with the Borough and/or other entities in areas within the SESF that are identified for potential restoration opportunities.</p> <p>Harvesting in the western sub-unit of Bradfield Canal could impact scenic, recreational and crabbing/fishing activities; plus yachts visit area.</p> <p>Archeological sites by Bradfield Canal.</p> <p>Cultural sites exist near Crittenden Unit.</p> <p>CBW may be interested in sharing road or LTF access associated with the Crittenden Creek Unit (and same at Earl West Cove &amp; Eastern Passage). Important habitat area by Crittenden Creek. Mill Creek area used extensively for recreation and subsistence fishing. Cultural resources present in area.</p> <p>Earl West Cove is a heavily used recreational area; CBW lands adjacent.</p> <p>CBW lands abut SESF in Sections 2 and 11 in Eastern Passage Unit. Future harvesting needs to consider private lands downslope and drainage issues from harvesting activities.</p> <p>Pat Creek Lake and stream are heavily used for recreational activities; under consideration for restoration proposals. Joint road use seen as beneficial to the CBW.</p> <p>Zarembo Unit selection by Borough approved.</p>	<p>CBW added.</p> <p>Forest road options are normally addressed in the FYSTS and FLUP stages; SESF MP allows for this flexibility.</p> <p>Plan does not restrict restoration activities.</p> <p><u>X</u> Presence of known cultural sites added to unit cards.</p> <p><u>X</u> Noted on card.</p> <p><u>X</u> Checked maps and final land transfer.</p> <p><u>X</u> Uses noted on card.</p> <p><u>X</u> Added restoration consideration to unit card</p> <p><u>X</u> Zarembo unit removed from SESF.</p>
26	Greater Southeast Alaska Conservation Community	4/30/15	p. 2: SESFMP fails to meet statutory planning requirements [AS 38.04.065(b)]	Disagree

<p>(GSACC et al): Greenpeace; Cascadia Wildlands; The Boat Company; and the Center for Biological Diversity</p>		<p>SESFMP not based on “operational inventory”; lack of inventory data in many Unit Cards; SESFMP fails to meet AS 38.04.065(b);</p> <p>“the draft inventory does not provide enough information about the volume by acreage needed to determine consistency with the sustained yield mandate. As best as we can tell, it likely overestimates the harvestable volume.”</p> <p>p. 4: the inventory process is incomplete and DOF needs to develop an operational inventory that uses all applicable data and then revise the SESFMP.</p> <p>2015-2019 FYSTS of 250 MMBF exceeds annual allowable cut;</p> <p>p. 5: “Also, the SESFMP ignores Constitutional requirements to provide for the sustained yield of fish and wildlife. For example, the DOF must explicitly provide for the sustained yield of predators such as wolves and bears. [See <i>West v. State</i>, 248 P.3d 689 (Alaska 2010)]. The sustained yield principle requires “conscious application insofar as practicable of principles of management intended to sustain the yield of the resource being managed.””</p> <p>p. 5: “the public review SESFMP should be revised to show how DOF intends to log the SESFMP without running afoul of sustained yield principles, and adopt measures to ensure the sustained yield of fish, wildlife and other forest values.”</p> <p>p. 6: “The SESFMP forestry management goals and guidelines thus need to adopt management guidelines for local processing in order to meet AFRPA standards that require management in a “manner that best provides for the present needs and preserves the future options of the people of the state.” [AS 41.17.060(c)].”</p> <p>p. 7: “we think the SESFMP needs to include management guidelines explicitly aimed at conserving yellow cedar, including a prohibition on logging the species where it currently persists.”</p>	<p>Draft 2011 SSE Area Operational Forest Inventory finalized in February 2016; final SESFMP reflects this 2016 Forest Inventory</p> <p>FYSTS are not sales and therefore cannot “exceed the annual allowable cut.”</p> <p>ADF&amp;G and Boards of F&amp;G manage fish and wildlife harvests – not DOF. DOF manages the forest sustainably, in consultation with ADF&amp;G regarding habitat concerns.</p> <p>FRPA is a proven, successful framework providing protection of fish habitat and water quality; regenerating the forest, etc.</p> <p>Local processing is a business element that is normally outside of DOF’s primary responsibility to provide sustainable harvests of state resources from state lands.</p> <p>DOF sustainably manages all the primary commercial species in the SESF; including yellow cedar. A prohibition on logging cedar is unwarranted.</p>
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			<p>p. 7: "The SESFMP fails to establish any meaningful guidelines to mitigate the impacts of clearcutting on other resources, including buffers for headwaters streams, den buffers, and forest structure retention requirements for avian species and smaller mammals."</p> <p>p. 7: "The SESFMP needs to develop an actual guideline for the siting, mitigation and monitoring of LTFs to be consistent with the state's antidegradation policy and other applicable law, such as the EPA general permit conditions. We recommend that you prohibit in-water log storage, and require barging for all logs removed under the SESFMP."</p> <p>p. 9: "the SESFMP's marine transportation program will result in permanently unsuitable fishery habitats, and that thus the state has abdicated its public trust duty."</p> <p>p. 9: "<i>The "roads to resources" program violates the public trust</i>"</p> <p>p. 9: "At its core, DNR's draft Forest Plan conflicts with Alaska's constitution and statutes. This conflict exists because the draft plan contains <i>insufficient</i> information, analysis and consideration regarding fish and wildlife and their habitats to ensure that DNR's over-eager attempt to maximize the production of timber:"</p> <p>p. 10: "The draft SESFMP does not evaluate the spectrum of present needs or the people's future options and the need to preserve them. This failure is particularly glaring concerning old-growth wildlife habitat, which for all practical purposes is a non-renewable resource whose maintenance is important to both present needs and future options."</p>	<p>FRPA and ADF&amp;G consultation, plus adaptive management addresses these concerns.</p> <p>Outside scope of DOF's management responsibilities.</p> <p>The SESF MP is based upon FRPA and its regulations that avoid, reduce, or mitigate impacts. DOF consults with and gives due deference to ADF&amp;G on other fish and wildlife habitat concerns (AS 41.17.098. (d)).</p> <p>Comment on this program is not relevant to the plan.</p> <p>Disagree. FRPA is a success; this plan builds on that success.</p> <p>The SESF is less than two percent of the land area in SE Alaska; Old growth reserves in the Tongass NF and other federal land management are designed to meet the region's wildlife needs, taking into account non-NFS land uses, too.</p>
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		<p>are needed in this plan..."</p> <p>p. 15-16: "The unit cards on pp. 43-67 ... lack important information." The introductory text says that they provide management intent; however, no clear intent is provided on them. Each unit of the Forest is deserving of a detailed discussion in this chapter of its qualities with respect the resources it contains and how DNR intends to manage each of them – the unit cards do not suffice. In addition, the plan needs to include topographic vegetation-type maps for each unit of the Forest and the surrounding wildlife analysis areas (WAAs), including both Forest land and land in other ownerships. For each unit, one map should show the present condition, another should show the condition after stem exclusion from all logging to date has occurred, and a third should show the expected condition after DNR's intended rotation has been completed."</p> <p>p. 16: "... urge that units with goshawk nests not be logged, or ... that sufficient foraging habitat be preserved through ... unit-specific management guidelines."</p> <p>p. 16: "...you should prohibit timber harvest in the Neets Bay area and reclassify the land for other purposes." Due to hatchery.</p> <p>P. 17: Ethical concerns raised about role of The Working Forest Group in the SESFMP; and DOF staff /BOF member involvement with TWFG. ..."we believe that it would be appropriate for you [Mr. Clarke] to refrain from further participation in the development of the SESFMP pending completion of the disclosure and review procedures set forth in AS 39.52.210 and AS 39.52.240. These procedures also should be followed by TWFG's executive director due to her position on the BOF. [AS 39.52.220].</p>	<p>consult with ADF&amp;G regarding conservation concerns during the FLUP process. This is a "state forest plan"; other agencies and other planning efforts are delegated the responsibility for the sustained yield of fish and wildlife, etc. place with ADF&amp;G.</p> <p>This level of detail is unnecessary and may be inefficient to gather for such small forest units [300+ acres on the low end].</p> <p>More detail is gathered for specific timber sales during the FLUP step of timber sales. Doing this level of detailed information gathering for a unit that may not be harvested for another 50 to 100 years is not needed now.</p> <p>Timber planning takes these values into consideration in order to avoid adverse impacts; including consultation and due deference to ADF&amp;G</p> <p>Disagree with the description and conclusion.</p>
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			<p><i>“Conclusion: Withdraw and Revise the Public Review Draft</i></p> <p>For all of the above reasons, we request that you withdraw the public review draft, revise it, and develop an adequate draft that reflects an operational inventory, provides enough detail on how DOF intends to apply sustained yield principles to timber and wildlife resources to enable meaningful public comment, scrap plans for in-water log storage in favor of barging, and adopt appropriate protective measures for wildlife.”</p>	<p>DOF has addressed the relevant substantive comments from the public, finalized the forest inventory, and revised the plan accordingly.</p>
27	Pat & Heather Richter (Edna Bay residents)	4/30/15	<p>Fully support SESF MP; the proposed harvest areas in Edna Bay’s East, North, and South units will have a positive impact on the economy of Edna Bay. Suggest smaller, long-term sales to avoid ‘boom and bust’ scenario.</p>	<p>SESF Plan and ongoing DOF timber sale coordination is consistent with this comment.</p>
28	David Beebe, Vice Mayor City of Kupreanof	4/30/15	<p>SESFMP targets low elevation forest habitat crucial to restoring degraded deer populations on Mitkof Island.</p> <p>SESFMP fails to provide for the sustained yield of Sitka black-tailed deer and other old-growth dependent species such as pine marten and goshawk. FRPA does not address wildlife; therefore the SESFMP cannot be implemented until the legislature amends FRPA to address all replenishable resources, including wildlife.</p> <p>In stark contrast to the role of ADFG as co-manager of wildlife on federal forestlands, the SSFMP provides no meaningful input nor co-management authority from the ADFG on state forest lands in which to fulfill the constitutional mandate of Article VIII on over 48,000 acres.</p> <p>As far back as 1980, the Alaska Joint Boards of Fisheries and Game unanimously passed a resolution titled <i>“Clearcut Logging in Southeast Alaska”</i> in short, resolving that</p> <p><i>“The State Forest Practices Act be amended to adequately address wildlife concerns.”</i></p> <p>To date, this has not occurred, and as a consequence, neither DNR nor the Division of</p>	<p>Timber planning takes these values into consideration in order to avoid adverse impacts; including consultation and due deference to ADF&amp;G.</p> <p>Forest plan is required by AS 41.17.230.</p> <p>Amending FRPA goes beyond the scope of this planning process</p>

			<p>Forestry (DOF) nor ADFG has been statutorily capable of fulfilling constitutional obligations to oversee and manage for a sustainable yield of deer and other old growth dependent species in state forests.</p> <p>The Department of Natural Resources (DNR) cannot implement the SSFMP to fully comply with Article VIII unless the legislature amends the Alaska Forest Resources and Protection Act (FRPA) to address the full range of “replenishable resources” including old growth dependent wildlife.</p>	<p>Outside the scope of this planning process.</p>
29	Buck Lindekugel Greater Southeast Alaska Conservation Council	4/30/15	<p>p. 2: “More specifically, the PRD explains that: “[o]n uplands, the [GU] designation refers to areas where resource information is insufficient to warrant a specific designation, development is unlikely during the planning period of 20 years, or where a number of uses can be accommodated.” PRD at 82. DOF fails to identify what new resource information is now available for state forest lands previously designated GU, to enable DOF to conclude that they qualify as “operable available commercial forest lands for making the sustained yield or annual allowable annual cut calculations.” See PRD at 17. Please explain and evaluate this new information.”</p> <p>“Is DOF proposing to consider all forested land within the SESF as currently available for logging, or some subset of the 33 units in the SESF located on 12 different Southeast Alaska islands and the adjacent mainland? Please explain what basis the Commissioner will have for deciding that a particular unit is appropriate for commercial logging now under this plan, what rate is appropriate so that logging will not significantly impair the productivity of the land and water, and what allowance needs to be made to maintain important fish and wildlife habitat. See AS 41.17.065(c)(1), (5), and (7).”</p> <p>“Notwithstanding DOF’s interest in minimizing the reviewability of its annual allowable cut finding by</p>	<p>Simple; this is simply the glossary definition for GU being quoted, based upon Area Plan.</p> <p>The final 2016 SSE Area Operational Forest Inventory provides sufficient data for managing the GU lands being reclassified as Forest through the SESFMP process and its Land Classification Order No. SE-15-001.</p> <p>The DOF management of the SESF’s forested lands will utilize this plan, the 2016 Operational Inventory, FRPA, the judgment of professional foresters, and input from other agencies and the public in determining when, where and how much of the state forest will be logged, consistent with sustained yield..</p> <p>Same response as</p>

		<p>characterizing it as a technical calculation, either the final plan itself, or the Commissioner’s approval, must demonstrate that the plan complies with the constitutional principle of sustained yield. <i>See</i> PRD at 17; <i>SEACC v. State</i>, 665 P.2d 544, 548-49 (Alaska 1983).</p> <p>DOF also needs to articulate fully the basis for its sustained yield or annual allowable cut calculation and demonstrate the factors it considered in reaching its conclusion.”</p> <p>p. 3:”Consequently, for purposes of this forest management plan, DNR must also consider sustained yield as defined in AS 41.17.950(26) which “means 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, . . . ” (emphasis added). Please explain how DOF’s sustained yield calculation for the SESF management plan incorporates this essential caveat.”</p> <p>Pp 4-6: Forest Inventory questions</p> <p>p. 6: “Allowance for Important Fish and Wildlife Habitat As noted above, state law requires allowances for important fish and wildlife habitat. For these reasons, we recommend DOF drop important salmon watersheds, like Crittenden Creek near Wrangell from the suitable timber base. According to the Central-Southern Southeast Area Plan (at p.3-197), Crittenden Creek “is an important anadromous fish stream . . . .” Wildlife is also abundant here and “[f]ishing and hunting activities are the main current activities.” <i>Id.</i> There is no local demand for the wood from this area; most of the area consists of scattered estuarine and riverine wetlands, which would significantly increase the costs associated with logging, and numerous heritage sites.</p> <p>Although 2011 draft Inventory included 550 foot “retentions” along each side of the creek and 1000 foot retentions at the mouth of the creek, what is</p>	<p>above.</p> <p>See 2016 Operational Inventory.</p> <p>DOF’s overall timber management program is designed and carried out to accomplish just this outcome. See 2016 Operational Inventory.</p> <p>FRPA and the robust multiple consultations with other agencies explicitly protect fish habitat and water quality. Documented.</p> <p>See FRPA.</p>
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			the scientific rationale for these buffers? What scientific evidence supports a conclusion that such retentions will achieve state riparian and wildlife management objectives?"	
30	Karin McCullough and Mike Stainbrook (Petersburg residents)	4/30/15	<p>More planning needs to be done prior to any timber harvesting occurring. Need to take into account science that addresses how to harvest timber without adversely impacting salmon streams and intertidal salmon habitat.</p> <p>It is important to really study the needs of the small mill operations and plan for future years.</p> <p>"It is important to look at state lands within the context of activity by Sea Alaska [sic] and by the Forest Service and the needs of fisheries habitat (salmon, crab, and more)."</p>	Additional planning takes place as directed by statute 41.17. DOF engages in a robust planning process that reviews Area Plans and Forest Plans, prepares and publishes FYSTS, PBIF/BIFs, and FLUPs, as well as consulting with other timber land owners; and provides public notice, review, and input at multiple steps.
31	Nevette Bowen (Petersburg resident)	4/30/15 -11:06 pm  Late; no standing	<p>Opposing SE FYSTS.</p> <p>"The proposed plan appears to be cutting too much too fast with little benefit to the general or local public in an effort to provide life support for a few timber operators."</p> <p>"The large proposed timber sales on state land on Mitkof Island are incompatible with these original [criteria for state land selections from the Tongass National Forest] goals.</p> <p>Alaska and Petersburg needs a state forestry plan that protects wildlife, fish and water and takes into account community well-being while providing local opportunities to harvest timber for value added products. This plan does not accomplish this."</p>	Will consider input; though no standing to request reconsideration since Ms. Bowen's input submitted after close of comment period.
	<b>Testimony at Public Hearings</b>			
	Victoria McDonald (Oral testimony – 1 of 1 in Ketchikan)	4/14/15	Her concern with giving more lands to the State centers on "sustainability;" what strategy does the state foresee if given more land? "People fail to recognize that only a small scale of logging will	No change to plan.

			<p>sustain the future needs of Southeast.”</p> <p>The Tongass is extremely valuable as the largest carbon sequestration area in the United States; “Alaska could be a leader in carbon sequestration.”</p> <p>“I recommend that the State be given additional land but to put its efforts into habitat restoration”</p>	Carbon issues go beyond scope of this forest plan.
	Jay Pritchitt (Oral testimony – 1 of 9 in Petersburg)	4/15/15	Expressed concern that other Petersburg public meetings start in at 7 PM [not 6]; so fewer people are here to provide testimony.	The local norm for a 7 PM meeting start time is noted.
	Joan Kautzer (Oral testimony – 2 of 9 Petersburg)	4/15/15	<p>“During the best of financial times, the State has an abysmal record of preventing timber related landslides that have hurt fish producing streams and have jeopardized public safety and infrastructure.”</p> <p>“There simply is no money to finance a responsible timber program in Alaska. There won’t be money for enforcement and oversight of the State Forest Practices Act, which is a regulatory policy to begin with.”</p> <p>“The State can’t pretend that their clear cuts exist in a vacuum. There are lasting cumulative impacts from other adjacent clear cuts on private and federal lands that only compound the problems. [inaudible 47:45] that there are no wildlife concerns for the majority of these sales would be laughable if it wasn’t so tragic.”</p>	Noted; no change in plan.
	Joseph Sebastian (Oral testimony – 3 of 9 Petersburg)	4/15/15	Suggested several alternative names for the SESF; no specific issues or concerns with plan.	No change in plan.
	David B. Randrup (Oral testimony – 4 of 9 Petersburg) Also written	4/15/15	Commented on Tongass plan, harvest and Sealaska. Support small local mill owner; does not like big sales “the small guy can’t get.” Think of the communities.	No change in plan.
	Chris Fry (Oral testimony – 5 of 9 Petersburg)	4/15/15	Small mill owners need a sustainable supply of logs; suggest state put more emphasis on small sales to benefit local mills; these also benefit community more than larger export sales.	DOF is responsive to the needs of the small mill owners.
	Rebecca Knight	4/15/15	Issue of cumulative timber harvest impacts from	



<p>(Oral testimony – 6 of 9 Petersburg) and written</p>		<p>TNF on Mitkof Island – added to proposed state harvests of 4,000 acres.</p> <p>“The State is not excused from its constitutional obligation to manage sustainably for all renewable resources simply because the primary use of the state forest is for timber production. Other resources that must be managed—other resources that must be managed sustainably include timber production as well, but also fish, wildlife, recreation and tourism.” Restricted deer season is an issue, as is protection of deer critical winter range.</p> <p>“I’m also curious if the State arbitrarily changed the rotation age because I thought it was 100 years.”</p> <p>“Regarding the Woodpecker Parcel that’s 1,155 acres, that’s right near popular camping sites”.</p> <p>“the hillside above Woodpecker has southern exposure, completely exposed to strong southeast winds, from [inaudible 01:04:31] and is especially vulnerable during heavy storms. For the expansion of logging and roading on that hillside are a bad idea and should be altogether eliminated from consideration.”</p> <p>South Mitkof unit faces ferry route so visual affects a concern; and is last of important deer habitat on south end of island.</p> <p>Regarding the Frederick Point North and Frederick Point South, “there’s no consideration for scenery or recreation.”</p> <p>“the upper regions of Cabin Creek are going to be affected and I’m not clear on exactly what the boundaries are for that water shed—for a domestic drinking water, water shed,...”</p> <p>“Your plan should provide for no diminishment of [inaudible 01:06:01] recreation experience. It’s home to 3,000 close residents, not to mention the</p>	<p>Cumulative impacts and sustainability are addressed during timber sale planning; and during consultations with ADF&amp;G.</p> <p>Rotation age may vary between different areas due to multiple factors such as site productivity and markets.</p> <p>Unit card recognizes this is near a high use camping area.</p> <p>Landslides are naturally occurring; best management practices recently updated to mitigate this risk.</p> <p><u>X</u> Added ferry route to scenery section.</p> <p>DOF abides by requirements to protect municipal water supplies.</p>
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			few hundred that inhabit the greater borough.”	
David Beebe (Oral testimony – 7 of 9 Petersburg) Also written	4/15/15	<p>“There’s a very big difference between a corporate tree plantation and an old growth rainforest. That gets to the heart of the issue. That is Article 8, Section 4, sustained yield. Fish, forests, wildlife, grasslands and all other replenishable resources belonging to the state, shall be utilized, developed and maintained under sustained yield principle, subject to preferences among beneficial uses. And one of those beneficial uses is definitely deer.”</p> <p>SESF Plan should recognize subsistence priorities</p>	<p>State lands and their replenishable resources, taken as a whole, are being managed under the ‘sustained yield principle.’</p> <p>Subsistence priorities are taken into consideration during consultation with ADF&amp;G at the FLUP step of timber sale planning.</p>	
Carolyn Pritchett (Oral testimony – 8 of 9 Petersburg)	4/15/15	<p>Recreation concerns for “Frederick Point and the other is the Woodpecker Cove. Now that we’re retired, we are out in those two areas probably five of seven days a week. If you were talking about scenic quality and public safety, the worst thing you could do in the world is develop these for logging. It takes these areas away from us temporarily and permanently. I mean, we are just enjoying these areas because the old logging is now growing over.”</p>	No change in plan.	
Eric Lee (Oral testimony – 9 of 9 Petersburg)	4/15/15	<p>“I request that the State make Mitkof Island a model of sustainable forest management by harvesting only specialty woods and a cure to its own guidelines for wildlife protection and multiple use. “</p> <p>“..the deer population on this island has already been decimated by logging.”</p> <p>“We’ve got trees that took 600 years or longer to grow, but they’re worth a lot of money. To see you cut those down and then you say it’s going to be on a rotation for 60-80 years and that’s sustainable, that’s not sustainable, that’s starting a new product and calling it the old product so that you can—you can manage your tree farm, your tree orchards.”</p>	<p>Articulate extended harvest periods and coordinated timber sales to support local community economies where feasible.</p>	
Carol Rushmore (Oral testimony – 1 of 1 Wrangell)	4/22/15	<p>“it’s very important in the planning process that you do coordinate with the adjacent land owner, especially when it comes to the roads.”</p>	<p>Articulate extended harvest periods and coordinated timber sales to support local</p>	

			<p>“...it would be very beneficial to have that conversation with the borough because of adjacent borough land.”</p> <p>“So, for the record, Crittenden Creek [Unit] Map, reflecting Eastern Passage, that—the land within Section 29, 28 that shows as State is actually borough lands, that was previously conveyed years ago and I think—yeah, the rest of it is borough. I thought there was still a section of state in there but I’m still confirming that. But I do know that what you have listed here as state is actually municipal.”</p>	<p>community economies where feasible.</p> <p>Maybe state land showing on south shore of Eastern Passage south of Crittenden Unit.</p>
<p>Formal public notice of the proposed action to adopt <b>Leasehold Location Order #40</b> was published on December 9, 2015; with comments accepted through 5 PM on January 11, 2016.</p>				
	Three comments were received on LLO #40		This notice took place because a draft LLO was not included during public review of the draft Southeast State Forest Management Plan in early 2015.	
1	Richard Lessard, Division of Mining, Land and Water - Mining Section	1/6/16	<p>“Land management, permitting, and regulatory controls already in place effectively afford the same level of protection as a Leasehold Location Order in regards to mining and timberland management.”</p> <p>The Mining Section recommended: “Leasehold Location Order 40 is not needed and should not be authorized.”</p>	DOF has withdrawn consideration of the LLO for the SESF as part of this plan. Special areas within the SESF such as the Neets Bay Hatchery watershed may be considered for an LLO in the future.
2	Deantha Crockett, Alaska Miners Association	1/7/16	AMA requested a 60 day extension of the comment deadline.	An extension is unnecessary.
3	Owen Graham, Alaska Forest Association	1/8/16	“It is not clear what the adverse impacts [from mineral development] might be and why this coordination cannot take place without this mining restriction.” “[W]e are unaware of any conflicts with the mining industry.” AFA requested a 60 day extension of the deadline to comment on the proposed action.	DOF will continue to coordinate with the mining industry.  An extension is unnecessary because LLO was withdrawn from consideration.