

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



Coastal Region-Southeast Area Office

**Final Best Interest Finding
and
Adopted Forest Land Use Plan**

**Tuxekan Timber Sale
SSE-1392-K**

August 2025

Abbreviations

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

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I. PROPOSED ACTION

The Division of Forestry and Fire Protection (DOF) is proposing to offer for sale approximately 188 acres of mixed age timber from Southeast State Forest (SESF) and General Use (GU) State lands on the Prince of Wales (POW) Island area (Tuxekan Island), approximately 1.0 miles west of the community of Naukati Bay (see Appendix A, Timber Sale Area Map). Timber is predominately young growth Sitka spruce (*Picea sitchensis*) and western hemlock (*Tsuga heterophylla*) with interspersed residual old growth hemlock and redcedar (*Thuja plicata*). The volume to be offered totals approximately 5,000 thousand board feet (MBF). The DOF proposes to sell the commercial timber in one competitive sale under provisions of AS 38.05.120.

Selling the timber in an open and competitive manner using the AS 38.05.120 authority in Southeast Alaska will likely generate a stumpage revenue to the State. Purchasers of competitive sales typically use the round log export market and obtain higher returns on their investment. Most of this sale is young growth timber; while there has been interest in shifting harvest activity away from old growth timber, there has not been significant interest to date manufacturing young growth timber in existing mills in Southeast Alaska.

The management objectives for the proposed timber sale area are:

1. To follow the Alaska Department of Natural Resources' (ADNR) constitutional mandate to encourage the development of the State's renewable resources (Article 8.1), making them available for maximum use consistent with the public interest;
2. To 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 in Southeast Alaska due to the combination of road building, logging, trucking and potentially milling;

II. STATUTORY AND REGULATORY AUTHORITY

The Division is taking this action under the authority of

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

III. ADMINISTRATIVE RECORD

The Division will maintain an administrative record regarding the decision of whether or not to proceed with the action as proposed. This record will be maintained at the DOF's Southeast Area Office filed as SSE-1392-K.

IV. SCOPE OF DECISION

This Best Interest Finding (BIF) and Forest Land Use Plan (FLUP) are parts three and four of a six-part process to design, sell, and administer timber sales; for this timber sale the documents are combined into a single document. This BIF and FLUP describes the DOF's intent to sell approximately 188 acres of young and old growth timber composed of western hemlock, Sitka spruce, western red cedar, and Alaska yellow-cedar on Southeast

State Forest and General Use Classified land located within portions of Sections 13, 14, 23, and 24, Township 69 S, Range 79 E, CRM.

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

1. The DOF elected to retain timber around the cataloged southern bald eagle nest location in addition to the two nests locations on the north end of the peninsula. The total area of the timber sale was therefore adjusted.
2. Discussion was added in Cost and Benefits section summarizing observed market conditions during the summer of 2025.

The following list summarizes the overall process:

Part 1: Regional Planning. The Department of Natural Resources develops area plans and state forest management plans to designate appropriate uses for state land, classify the land accordingly, and establish management guidelines for multiple use. These plans determine where timber sales are an allowed use, and what other uses must be considered when designing and implementing timber sales. Subsequent land use decisions must be consistent with provisions contained within the applicable area and/or forest plans. The timber sale area in this BIF is covered primarily by the Subunit 7b of the Prince of Wales Island Area Plan (POWIAP). The Land Classification of Tuxekan Island in this area is General Use (GU) and Southeast State Forest (SESF) Lands. The sale is accessed through SESF land on its south side and is covered by the Southeast State Forest Management Plan. The Land Classification of that area is SESF.

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

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

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

Part 4: Forest Land Use Plans (AS 38.05.112). Prior to authorizing harvest of timber on any area greater than 10 acres, the DOF must adopt a site-specific Forest Land Use Plan (FLUP) for the harvest area. DOF has prepared FLUPs for the harvest area within the overall sale area covered by this best interest finding. The FLUP specifies the site, size, timing, and harvest methods for harvest units within the sale area. The FLUP also addresses site-specific requirements for access construction and maintenance, reforestation, and multiple use

management. The FLUP is based on field work and site-specific analyses by the DOF. Appropriate regulatory agencies have been consulted, and the plan is subject to public review.

Part 5: Timber Sales and Contracts. Following adoption of the BIF, the DOF may offer the timber for sale using the identified authority. The Division will sign a contract with the purchaser for each sale. The contract will include stipulations to ensure compliance with the BIF, FLUP, and statutory requirements.

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

V. PROJECT LOCATION, LAND STATUS, AND DESCRIPTION

A. Location

The timber sale area is found within Sections 13, 14, 23 and 24, Township 69 South, Range 79 East, Copper River Meridian (CRM). The sale area is found within the Craig D-4 NW and Craig D-4 SW USGS quadrangles. See Appendix A1, Area Map, Best Interest Finding, SSE-1392-K Tuxekan Timber Sale.

B. Title status

Patented to the state (Patent No. 50-2002-0072) under National Forest Community Grant (NFCG) 346.

C. Land use planning, classification, and management intent

The proposed timber sale area is within the geographic region covered by the POWIAP (adopted 1985, updated 1998). The area in this BIF is covered by the Sea Otter Sound Subunit 7b in the POWIAP with land classification of General Use (GU) and in the Southeast State Forest (SESF). The DMLW is the land manager for all State lands other than the SESF in this timber sale. The DOF is the forest resource manager for all SESF lands contained in the timber sale.

The primary purpose of the state forest is, “timber management that provides for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources” (AS 41.17.200(a)). SESF lands are classified as forest land. The DOF is the land manager for the SESF;

The specific management intent for the uses of lands other than SESF in the in the timber sale area follow (excerpted from the POWIAP Sea Otter Sound Subunit 7b – Tuxekan):

BACKGROUND

This subunit includes the southwest part of Sea Otter Sound, including Tuxekan Island, Tuxekan Passage, and a section of Prince of Wales Island just north of Naukati to Ahtun Point. The Naukati area is in Subunit 7c.

Tuxekan Island has an isolated road system for timber harvest. Access is primarily by boat or floatplane.

MANAGEMENT INTENT AND GUIDELINES

“State tidelands and submerged lands will be managed for multiple use. Logging, centered on Tuxekan Island, is the primary economic activity. State tidelands and submerged lands will be managed to support this activity.”

“Jinhi Bay has protected waters that can be assessed from the Tuxekan road system. This subunit will be managed for multiple uses. Water dependent commercial or industrial activities are both considered appropriate at Jinhi Bay, and there is limited usable waterfront land for water-related commercial or industrial activities at Naukati. Inland areas can support a variety of uses, including limited timber harvest.

All state lands in this subunit are open to mineral entry.”

FISH AND WILDLIFE

Resource Information:

Crucial habitat for salmon rearing and schooling extends to a depth of 40 feet at mean lower low water at the mouths of anadromous fish streams unless otherwise indicated.

“Trapping and deer hunting on the uplands adjacent to Tuxekan Passage are not designated because they do not meet the criteria for intensive harvest.”

Management Intent:

Lands designated fish and wildlife habitat and harvest will be managed to avoid significant impacts to habitats and traditional harvest activities. Impacts on non-designated community harvest areas should be considered when authorizing activities (see Map 1-1).

FORESTRY

Resource Information:

The northwestern parcel has experienced extensive timber harvest and the forest consists of closed canopy stands. The southeastern parcel is only affected by timber harvest in its southern part. Commercial forest stands occur within the interior of the southeastern parcel.

Management Intent:

Log transfer for Tuxekan Island timber will continue at the long-term site in Nichin Cove (Site 7.22 LT). The U.S. Forest Service may need a log transfer on the west side of Tuxekan Island (Site 7.20 LT) for approximately 15 MMBF of timber. West Tuxekan (Site 7.20 LT) has been designated Forestry but road haul to Nichin Cove is preferred (see guideline below).

State tidelands and submerged lands designated “F” (Forestry) will be managed to support timber harvest activities consistent with other co-primary designations and guidelines. Upland areas designated General Use may be used for timber harvest subject to the restrictions of Chapter 2 guidelines.

All harvest activity must also be compatible with future commercial/industrial uses adjacent to Jinhi Bay. The latter areas are not expected to develop significantly during this planning period, but harvest operations must be coordinated with any site development activities conducted for this type of development. Because of the extensive past cutting, further harvest in the northwest parcel during the planning period is inappropriate. Timber harvest in the southeastern tract must consider habitat requirements adjacent to the coast during the FLUP planning process.

D. Current access and land use

The adjacent ownerships are the USFS and Sealaska. The road access to this sale area is by Tuxekan Island's isolated road system. The sale area is located approximately 1.5 miles north of the Sealaska Nichen Cove Log Transfer Facility (LTF) and accessed by the USFS 1470020 and 1470020.7 roads. The use of the Nichen Cove LTF and the 1470020 road through Sealaska and USFS lands is contingent on two separate facility and road use permits from Sealaska and the USFS respectively which are required before commercial traffic related to the harvest may occur across those lands.

The nearby community of Naukati provides logistical support and connection to outlying communities and camps in Sea Otter Sound. The community of Naukati is an unincorporated community. A public floatplane, harbor and boat launch views Tuxekan Island and the proposed timber sale area. Several state subdivisions exist in the community, and more have been considered and are in the planning stage.

Tuxekan Island and the surrounding areas have been extensively harvested by the USFS and other land-owners for the past fifty years. There are extensive road systems on the various islands including POW and Tuxekan. The footprint of this sale was harvested in the early 1950's using A frame methods. The community of Naukati was a large logging camp during the long-term contract with Ketchikan Pulp Company.

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

The State created the Southeast State Forest in 2010 and 2011 from lands previously classified General Use; one of these areas is located on Tuxekan Island and a portion of the proposed sale is on SESF. The DOF sold a 138-acre timber sale (SSE-0986K) on what is now SESF land directly south of the project area in 2001 which now has potential for pre-commercial thinning. Approximately 11 acres of timber northwest of that sale blew down in 2018. The DOF salvaged that timber in 2024 in the Jinhi Bay timber sale.

Viking Lumber Company currently moves state and Mental Health Trust timber through the Naukati LTF on POW to the west of the Naukati public boat launch approximately $\frac{3}{4}$ miles east of the proposed timber sale area.

Commercial oyster farms are located to the west of the peninsula on state tidelands and move product to market through Naukati.

E. Background and description of proposal

1. Background:

The demand for State timber is currently unprecedented due to the decrease and uncertainty of the federal timber supply. A diversified economy with a timber industry component has traditionally been important to southeast Alaska due to the extensive forests, its isolation and numerous economic benefits. By direction from the Governor and Legislature, the Division of Forestry and Fire Protection manages a timber sale program that makes timber volume available to help sustain the region's timber industry and economy.

Where commercial timber exists proximate to the tract, it was generally considered appropriate to include it in the sale in order to contribute to the revenue of the project, but only if its harvest was not expected to significantly detract from other resources.

2. Timber Volume and Sustained Yield:

The total estimated saw log volume identified in this sale is approximately 5,000 MBF based on DOF staff estimates.

The Division of Forestry and Fire Protection is required to manage its timber harvest on State Forest and General Use classified land on a sustained yield basis. "Sustained Yield" means the "achievement and maintenance in perpetuity of an annual or regular periodic output of the various renewable resources of the State land consistent with multiple use" (AS 38.04.910). The Division's policy is to define "regular periodic output" as output over a ten-year period. This is done to allow for market fluctuations and operational restrictions. Based on the DOF inventory of the land and the timber base, it uses an annual allowable cut of 9,100 MBF per year for the Southern Southeast Area. Timber sales that are sold in the Southeast Area will remain within the constraints of the allowable cut and will comply with sustained yield requirements at the time they are sold. The duration of the timber sale contract(s) will be governed by the economic conditions at the time of the sale. This timber sale is well within the annual allowable cut for forest managed state land.

3. Harvest Unit Design:

Reconnaissance by the DOF indicates that the sale areas are generally harvestable using ground-based logging techniques. This logging system will need to take advantage of directional timber falling techniques and utilize benches and uneven terrain to access all timber included. Areas of wet and saturated soil will require adequate puncheon in skid trails to minimize impacts on the soil and water quality. Where skid trails are established, soil integrity and soil compaction will be monitored to maintain existing site capacity or improve existing conditions for tree growth. Residual tree conditions will likewise be maintained with the intent to not significantly diminish young growth stands currently regenerating. Due to historic evidence of windthrow throughout the peninsula, leaving coastal retention areas does not appear to be prudent. In addition, a significant amount of residual defective redcedar timber resides in these shore zones that may add to the value of the timber sale.

Retention buffers are planned around the three bald eagle nests in the federal record located in the timber sale area; neither nest nor Bald Eagle tree tags were located during initial reconnaissance. Retention of timber on the north end of the island for the cataloged eagle use appears achievable and is planned. The tree or a nest on the south end does not appear to be present due to past wind disturbance; regardless existing timber is planned to be retained.

During the Fall of 2024 DOF foresters performed field reconnaissance of the proposed timber sale area. The overall objective was to confirm and examine timber types, potential road access, geology, soils, hydrology, cultural resource potential, and fish and wildlife use within the proposed sale area. By January 2025, DOF foresters completed field layout tasks, concurrent with final recon activities. Flagging of road centerlines, drainage structure locations, harvest unit boundaries, and associated natural resources were mapped in January 2025.

4. Unit Access:

Access to the Tuxekan Timber Sale (SSE-1392-K) is projected to utilize the USFS 1470020 Road going north from Sealaska Nichin Cove LTF. Use of this road and LTF will require the authorization of Sealaska by means of a facility and land use permit from Sealaska and a Road Use Permits (RUP) from the USFS.

F. Resources and management

1. Timber

a. Timber Stand Composition and Structure:

Timber types are primarily a mix of young growth Sitka spruce, and western hemlock with a minor old growth component of western red cedar, western hemlock and Sitka spruce and Alaska yellow cedar. These stands are uneven aged on the shoreline with most of the even aged young growth in the center of the tract. The east and west sides both have evidence of wind disturbance in the residual stand. The young growth is approximately 70 years old. Redcedar is of average quality for Sea Otter Sound. Some mortality is present in the hemlock on the northeast side from hemlock sawfly, generally no salvage value observed for the affected stems.

b. Stand Silvics:

The adjacent timber stand to the south is even-aged young growth timber, last harvested in 2001, with similar topography.

Stand improvement treatments such as pre-commercially thinning overly dense stands have occurred in the area historically. The benefits of thinning are an overall decrease in tree density and competition with an increase in tree growth rate and vigor. Thinning of other regenerating stands within this operating area of the SESF is planned within the next five years.

c. Reforestation and Site Preparation:

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

Natural regeneration is the preferred regeneration method for this sale, and it is anticipated that adequate stocking levels will be achieved within five years after harvest based on observations directly south in the 2001 clearcut. Experience with this regeneration method on POW has shown that well-stocked stands are readily established after utilizing the clearcut harvest method. Logging will break down the slash piece size and residuals to the ground level, accelerating decomposition and opening more growing space. Disturbance associated with logging will also increase seed bed opportunity and survival by creating mineral soil access and micro relief.

Sitka spruce and western redcedar are the preferred species for reforestation. Spruce and cedar will likely be the favored and dominant species due to anticipated increase in available light, nutrients and scarification in the units during harvesting operations. Scarification disturbs the vegetative mat to expose mineral soil which in turn provides a more receptive seed bed. Western hemlock will be a major component of the regenerated stand as well since it currently occupies the site, is an aggressive shade tolerant pioneer species, and is providing a seed source.

d. Topography and Soils:

The sale area is located on rolling near-coastal terrain with Jinhi Bay to the west and the Tuxekan Narrows to the north and west. The unit ranges from 0-200 feet above sea level. Predominant geology is limestone bedrock types overlain with brown mineral and organic soils. Karst geology is evident in the sale area with formations scattered throughout. Abrupt short relief and solution features are present. Steeper slopes contain moderately well-drained soils. Benches and more level terrain contain poorly drained soils including areas of saturated soils.

2. Wildlife habitat and harvest

As required by AS 41.17.098, DOF provides due deference to ADF&G to address wildlife habitat issues in the proposed timber sale design. The proposed timber sale was identified in the 2026-2030 FYSTS sent to ADF&G. No specific design issues were identified in that step.

Evidence of Sitka black-tailed deer (*Odocoileus hemionus sitkensis*) (tracks/scat/beds), black bear (*Ursus americanus*) (scat), and Alexander Archipelago wolves (*Canis lupus ligoni*) (scat, vocalizations) was not significantly evident in the timber sale area. Wolf vocalization was heard several times to the south on Sealaska land during reconnaissance of the timber sale area in the fall of 2024.

During the specific planning for this timber sale, ADF&G recommended the reservation of a retention area for wildlife cover along the beach as that location categorically has concentrated wildlife activity and typically has value not evident in other topographic locations during the winter. While this reservation provides multiple benefits, its focus for this decision was to minimize the impact of logging on subsistence availability of deer.

Given the timber sale area is removed topographically from the rest of the island (as a peninsula) and is not associated directly with extensive vertical or horizontal terrain, the usefulness of the area is observed to be localized.

The specific area has not been identified as critical deer habitat by ADF&G. The ADF&G has observed the significant change in cover type on the island in the past 50 years from forest management. They also stated that the timber harvest consequence to deer population on the island may be significant. ADF&G categorically recommended retaining all timber within 1,000 feet of most shoreline as it typically offers useful winter habitat. Retaining this amount of timber would effectively

preclude any timber harvest at this location given the peninsula is on average 2,000 feet wide. Reserving all the timber on the peninsula though is not in keeping with the land classification intent which considered the overall broader land use in the area.

The subsistence potential of this peninsula appears to be low based on the limited evidence of deer remnants and trails. While the area is directly across from the community of Naukati, it is only tide-water accessible by beaches that are relatively steep and rocky with limited access for humans or deer.

Dialog with ADF&G on this subject led to them reconsidering the original request with a request to match past DOF timber harvest reservation in similar classifications, that is retaining 300 feet of timber adjacent to the beach. The DOF examined the site in detail during the timber cruise and concluded that a timber retention would be subject to a high likelihood of significant disturbance. This is based on historic evidence around the stand associated with the timeframe of when it was harvested in the 1950's. The perspective is augmented by the recent 10-acre Jinhi Bay salvage sale located a quarter mile to the southwest. The Jinhi Bay footprint is adjacent to a large clear cut from 2003. Residual timber adjacent to the 2003 clear cut has experienced notable damage from wind disturbance. The salvage sale footprint was precipitated by damage that occurred over the span of several years. Considering the long-term forest health and the state administration's direction to make all available forest resources available to the remaining industry of Southeast Alaska, the DNR does not intend to retain the beach timber for deer habitat at this location.

The United State Fish and Wildlife Service (USFWS) publishes a geodatabase of identified bald eagle (*Haliaeetus leucocephalus*) nest locations. The last time these trees were physically documented was in the late 1980's. Three eagle nest locations were indicated by the database and searched for unsuccessfully in the field. Per 11 AAC 95.340 (c), the DOF avoids the nest locations in the planning of state timber sales. Retention buffers of 330' were placed around database nest locations for timber sale planning purposes. The DOF provides due deference to ADF&G and consulted USF&WS under their federal authority regarding the viability of this habitat. Evidence of natural stand disturbance (windthrow) was observed in all three tree locations. Neither agency provided definitive comment on the viability or significance of the areas. Based on the authority delegated to USF&WS, the DOF reserved timber for the eagle tree habitat at all the locations per 11 AAC 95.340 (c).

3. Fish Habitat, Water Resources, and Water Quality

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

Surface waters within and near the proposed timber sale were surveyed by field foresters. Streams were categorized with assistance from ADF&G GIS stream data related to the cataloged anadromous and high value resident fish streams.

Operations adjacent to cataloged anadromous habit are not anticipated. Two small surface waters are noted in the southwest portion of the sale. Surface waters in general were not prevalent. Most drainage in the area appears to be subsurface.

4. Recreation, Tourism, and Scenic Resources.

There are no known commercial recreation operations that use the proposed sale area where harvest will occur. Recreation in the timber sale is dispersed and tied closely to the existing road system and saltwater; use is occasional in nature for such things as hunting, berry picking, and wildlife viewing which will be limited during active harvest operations. The area is not known to have unique tourism values at this time.

5. Cultural Resources.

The DOF works with the State Historic Preservation Office (SHPO) to identify and avoid known cultural, historic or prehistoric sites in planning the proposed access routes and harvest areas.

G. Costs and benefits

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

The DOF projects that it will need a large sale format in the proposed area to attract the capital to mobilize and access the site. Access will be improved on State Forest land for timber management which increases the long-term operational flexibility of the forest to meet its purpose.

Based on DOF observations of the project area and historic markets, timber revenue is projected to cover administration, access and operating costs for this sale area and possibly provide stumpage royalty to the State. This sale by regulation will not occur if it does not cover the projected cost of administration. The initial analysis of the costs of removal and the potential value of the timber indicates that the young growth hemlock and spruce timber will be exported in the round based on market demand and to generate adequate return for the expenses.

The restriction in February of 2025 on the import of young growth timber into the China market clearly challenges the current feasibility of this type of timber. Prior to that date, the Chinese timber market was viable barring the upsets from reciprocal tariffs and the Covid disruptions. Purchasers in the contemporary market are moving wood into smaller markets, sometimes at a loss to maintain capabilities for an improved situation in the future. There is hope if not an expectation that the market will change and improve as it has in the past. The downturn in the economy of China may also govern as it was stressed prior to the government's decision to bureaucratically remove it. The smaller markets available elsewhere have increased costs and inventory has been slow to clear. The State's decision to make this timber available regardless of current market reinforces its long-term commitment to support the remaining forest industry in the area with the limited resources it has available and the lead time it takes to produce and bring timber to market. To restrict availability of resources due to this specific situation is not warranted currently. The DNR continually reevaluates its perspective on making the State's resources available consistent with the public need. The overall perspective is to encourage the use and commerce of similar stands across the landscape which will not occur without supplying the resource.

While the DOF requires and encourages utilization of the timber resource by the timber purchaser, significant residual firewood potential typically is present after a timber sale is logged. The DOF is not planning to leave the road system open or inactive for the public to recover wood due to the road system being isolated by tidewater from local communities.

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

VI. PUBLIC REVIEW

The PBIF was publicly noticed in compliance with AS 38.05.945. Notice was posted on the Alaska Online Public Notice System on January 21, 2025. Notices were also posted at the Ketchikan, Craig Public Libraries. Mailed notices were distributed to a mailing list maintained by the Southeast Area Office and public notices were sent to the post offices of Ketchikan, Ward Cove, Craig, Klawock, Thorne Bay, Coffman Cove, Naukati, Metlakatla, Wrangell and Petersburg. A legal notice was also provided in the Ketchikan Daily News, Wrangell Sentinel and the Petersburg Pilot and the Island Post.

VII. PUBLIC COMMENT

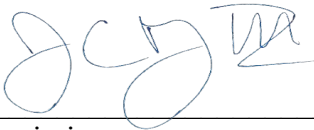
DOF received agency comment from ADF&G on the Preliminary Best Interest Finding. Public comment was received from the Alaska Forest Association and the Southeast Alaska Conservation Council.

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

VIII. RECOMMENDATION AND DECISION

After due consideration of all pertinent information, the ADNR has reached the following decision: to offer for sale approximately 188 acres of mixed age timber from Southeast State Forest (SESF) and General Use (GU) State lands on the Prince of Wales Island area (Tuxekan Island). Harvest activities on the General Use lands will follow the management intent of the Prince of Wales Island Area Plan. The DOF finds that this decision satisfies the objectives stated in this document and it is in the best interest of the State to proceed with this action under its authority in AS 38.05.035(e) (Powers and Duties of the Director) and AS 38.05.110-120; 11 AAC 71 (Timber Sale Statutes and Regulations; and AS 41.17.010-.950 and 11 AAC 95 (Forest Resources and Practices Statutes and Regulations).

IX. SIGNATURE



Commissioner
Alaska Department of Natural Resources

8.6.25

Date

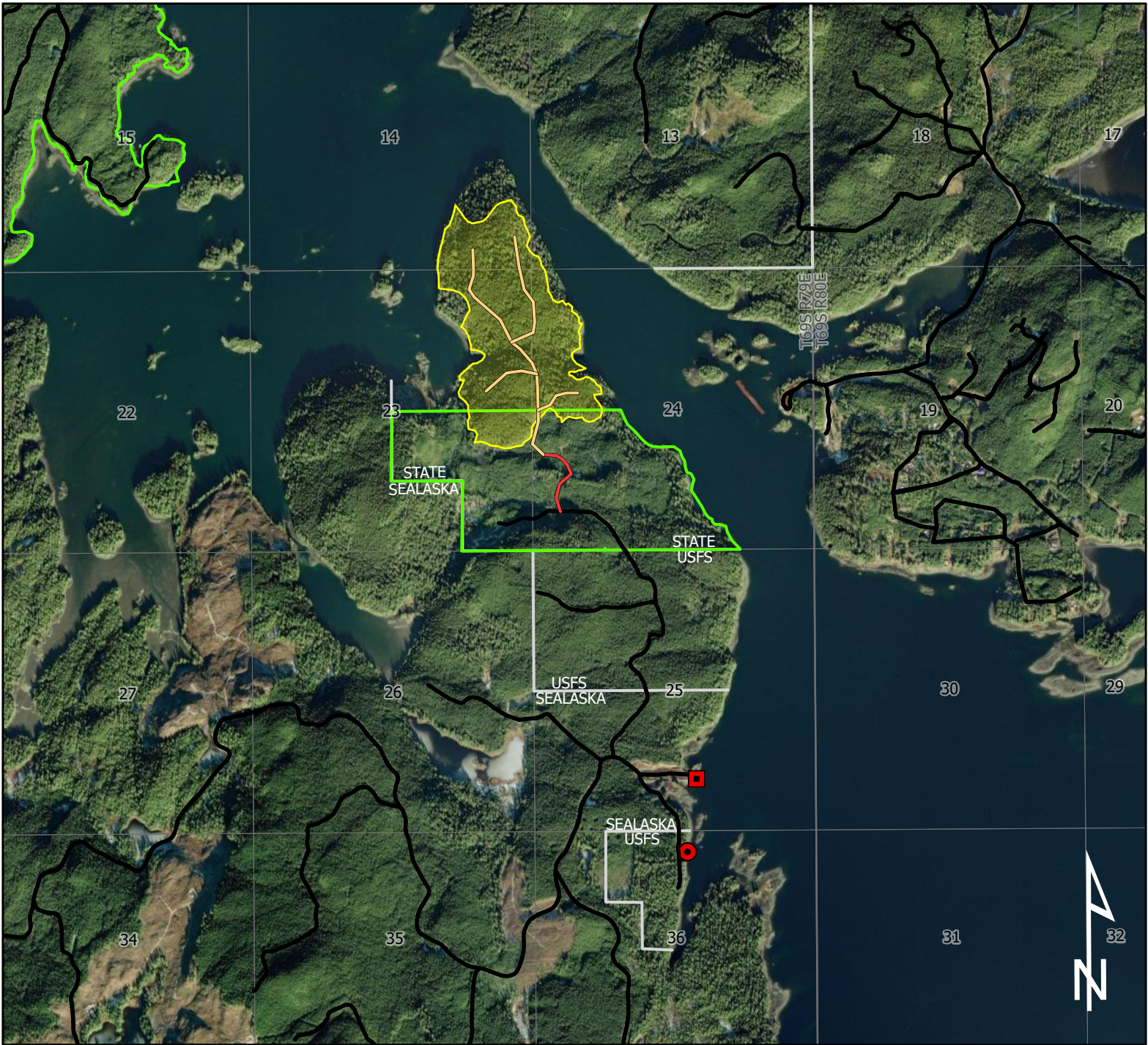
X. APPENDICES

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Appendix E	SSE-1392-K Tuxekan Forest Land Use Plan

Appendix A SSE-1392-K Tuxekan Timber Sale Area Maps

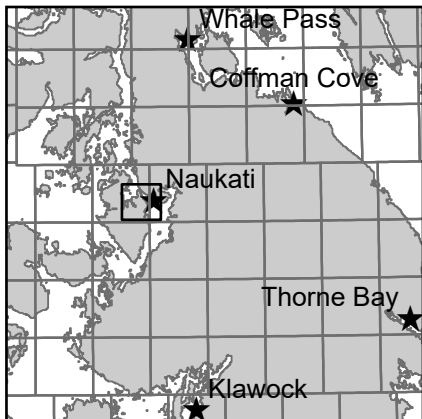
Vicinity Map (one page)

Unit Map (see FLUP)



0 0.25 0.5 1
Miles
Area Map 1 in = 1/2 mile

T69S R79E
Copper River Meridian



Vicinity Map 1 in = 20 miles

Legend

- Proposed Harvest Unit
- Southeast State Forest (SESF)
- Reconstruction
- Proposed Road
- Existing Road
- Property Line
- Nichin Cove LTF

APPENDIX A1 SSE-1392-K TUXEKAN TIMBER SALE AREA MAP



08/04/2025 GS

Appendix B References

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

Appendix C Appeal and Request for Reconsideration Regulations

Note: "Appeal" means a request to the commissioner to review a decision that the commissioner did not sign or cosign. "Request for reconsideration" means a petition or request to the commissioner to review an original decision that the commissioner signed or cosigned.

11 AAC 02 Regulations

11 AAC 02.010. Applicability and eligibility.

- (a) This chapter sets out the administrative review procedure available to a person affected by a decision of the department. If a statute or a provision of this title prescribes a different procedure with respect to a particular decision, that procedure must be followed when it conflicts with this chapter.
- (b) Unless a statute does not permit an appeal, an applicant is eligible to appeal or request reconsideration of the department's decision on the application. An applicant is eligible to participate in any appeal or request for reconsideration filed by any other eligible party.
- (c) If a statute restricts eligibility to appeal or request reconsideration of a decision to those who have provided timely written comment or public hearing testimony on the decision, the department will give notice of that eligibility restriction as part of its public notice announcing the opportunity to comment.
- (d) If the department gives public notice and allows a public comment period of at least 30 days on a proposed action, and if no statute requires opportunity for public comment, the department may restrict eligibility to appeal or request reconsideration to those who have provided timely written comment or public hearing testimony on the proposed action by including notice of the restriction as part of its public notice announcing the opportunity to comment.
- (e) An eligible person affected by a decision of the department that the commissioner did not sign or cosign may appeal the decision to the commissioner within the period set by 11 AAC 02.040.
- (f) An eligible person affected by a decision of the department that the commissioner signed or cosigned may request the commissioner's reconsideration within the period set by 11 AAC 02.040.
- (g) A person may not both appeal and request reconsideration of a decision.

11 AAC 02.015. Combined decisions.

- (a) When the department issues a combined decision that is both a final disposal decision under AS 38.05.035(e) and any other decision, including a disposal decision combined with a land use plan decision, or a disposal decision to grant certain applications combined with a decision to deny others, the appeal process set out for a disposal decision in AS 38.05.035(i) - (m) and this chapter applies to the combined decision.
- (b) Repealed 12/27/2012.

11 AAC 02.020. Finality of a decision for purposes of appeal to court.

- (a) Unless otherwise provided in a statute or a provision of this title, an eligible person must first either appeal or request reconsideration of a decision in accordance with this chapter before appealing a decision to superior court.
- (b) The commissioner's decision on appeal is the final administrative order and decision of the department for purposes of appeal to the superior court.
- (c) The commissioner may order or deny a request for reconsideration within 30 calendar days after issuance of the decision, as determined under 11 AAC 02.040(c) - (e). If the commissioner takes no action during the 30-day

period, the request for reconsideration is considered denied. Denial of a request for reconsideration is the final administrative order and decision of the department for purposes of appeal to the superior court.

(d) If the commissioner timely orders reconsideration of the decision, the commissioner may affirm the decision, issue a new or modified decision, or remand the matter to the director for further proceedings. The commissioner's decision, other than a remand decision, is the final administrative order and decision of the department for purposes of appeal to the superior court.

11 AAC 02.030. Filing an appeal or request for reconsideration.

(a) An appeal or request for reconsideration under this chapter must

- (1) be in writing;
- (2) be filed by personal service, mail, facsimile transmission, or electronic mail;
- (3) be signed by the appellant or the appellant's attorney, unless filed by electronic mail; an appeal or request for reconsideration filed by electronic mail must state the name of the person appealing or requesting reconsideration and a single point of contact to which any notice or decision concerning the appeal or request for reconsideration is to be sent;
- (4) be correctly addressed;
- (5) be timely filed in accordance with 11 AAC 02.040;
- (6) specify the case reference number used by the department, if any;
- (7) specify the decision being appealed or for which reconsideration is being requested;
- (8) specify the basis upon which the decision is challenged;
- (9) specify any material facts disputed by the appellant;
- (10) specify the remedy requested by the appellant;
- (11) state the address to which any notice or decision concerning the appeal or request for reconsideration is to be mailed; an appellant may also provide a telephone number where the appellant can be reached during the day or an electronic mail address; an appeal or request for reconsideration filed electronically must state a single address to which any notice or decision concerning the appeal or request for reconsideration is to be mailed;
- (12) identify any other affected agreement, contract, lease, permit, or application by case reference number, if any;
- (13) include a request for an oral hearing, if desired; in the appeal or request for reconsideration, the appellant may include a request for any special procedures to be used at the hearing; the appeal or request for reconsideration must describe the factual issues to be considered at the hearing; and
- (14) be accompanied by the applicable fee set out in 11 AAC 05.160.

(b) At the time an appeal is filed, and up until the deadline set out in 11 AAC 02.040(a) to file the appeal, an appellant may submit additional written material in support of the appeal, including evidence or legal argument.

(c) If public notice announcing a comment period of at least 30 days was given before the decision, an appellant may not submit additional written material after the deadline for filing the appeal, unless the appeal meets the requirements of (a) of this section and includes a request for an extension of time, and the department determines that the appellant has shown good cause for an extension. In considering whether the appellant has shown good cause, the department will consider factors including one or more of the following:

- (1) comments already received from the appellant and others;
- (2) whether the additional material is likely to affect the outcome of the appeal;
- (3) whether the additional material could reasonably have been submitted without an extension;
- (4) the length of the extension requested;
- (5) the potential effect of delay if an extension is granted.

(d) If public notice announcing a comment period of at least 30 days was not given before the decision, an appellant may submit additional written material after the deadline for filing the appeal, if the appeal meets the requirements of (a) of this section and includes a notice of intent to file the additional written material. The department must receive the additional written material within 20 days after the deadline for filing the appeal, unless the appeal also includes a request for an extension of time, and the department determines that the appellant has shown good cause for an extension. In considering whether the appellant has shown good cause, the department will consider factors including one or more of the following:

- (1) comments already received from the appellant and others;
- (2) whether the additional material is likely to affect the outcome of the appeal;
- (3) whether the additional material could reasonably have been submitted without an extension;
- (4) the length of the extension requested;
- (5) the potential effect of delay if an extension is granted.

(e) At the time a request for reconsideration is filed, and up until the deadline to file a request for reconsideration, an appellant may submit additional written material in support of the request for reconsideration, including evidence or legal argument. No additional written material may be submitted after the deadline for filing the request for reconsideration.

(f) If the decision is one described in 11 AAC 02.060(c), an appellant may ask for a stay as part of the appeal or request for reconsideration. The appellant must include an argument as to why the public interest requires a stay.

11 AAC 02.040. Timely filing; issuance of decision.

(a) To be timely filed, an appeal or request for reconsideration must be received by the commissioner's office within 20 calendar days after issuance of the decision, as determined under (c) or (d) of this section, unless another period is set by statute, regulation, or existing contract. If the 20th day falls on a day when the department is officially closed, the appeal or request for reconsideration must be filed by the next working day.

(b) An appeal or request for reconsideration will not be accepted if it is not timely filed.

(c) If the appellant is a person to whom the department delivers a decision by personal service or by certified mail, return receipt requested, issuance occurs when the addressee or the addressee's agent signs for the decision. If the addressee or the addressee's agent neglects or refuses to sign for the certified mail, or if the address that the addressee provided to the department is not correct, issuance by certified mail occurs when the decision is deposited in a United States general or branch post office, enclosed in a postage-paid wrapper or envelope, addressed to the person's current address of record with the department, or to the address specified by the appellant under 11 AAC 02.030(a)(11).

(d) If the appellant is a person to whom the department did not deliver a decision by personal service or certified mail, issuance occurs

- (1) when the department gives public notice of the decision; or
- (2) if no public notice is given, when the decision is signed; however, the department may state in the decision a later date of issuance and the corresponding due date for any appeal or request for reconsideration.

(e) The date of issuance constitutes delivery or mailing for purposes of a reconsideration request under AS 44.37.011(d) or AS 44.62.540(a).

11 AAC 02.050. Hearings.

(a) The department will, in its discretion, hold a hearing when questions of fact must be resolved.

(b) The hearing procedure will be determined by the department on a case-by-case basis. As

provided in 11 AAC 02.030(a)(13), any request for special procedures must be included with the request for a hearing.

(c) In a hearing held under this section

(1) formal rules of evidence need not apply; and

(2) the hearing will be recorded, and may be transcribed at the request and expense of the party requesting the transcript.

11 AAC 02.060. Stays; exceptions.

(a) Except as provided in (c) and (d) of this section, timely appealing or requesting reconsideration of a decision in accordance with this chapter stays the decision during the commissioner's consideration of the appeal or request for reconsideration. If the commissioner determines that the public interest requires removal of the stay, the commissioner will remove the stay and allow all or part of the decision to take effect on the date set in the decision or a date set by the commissioner.

(b) Repealed 9/19/2001.

(c) Unless otherwise provided in a statute or a provision of this title, a decision takes effect immediately if it is a decision to

(1) issue a permit that is revocable at will;

(2) approve surface operations for a disposal that has already occurred or a property right that has already vested; or

(3) administer an issued oil and gas lease or license, or an oil and gas unit agreement.

(d) Timely appealing or requesting reconsideration of a decision described in (c) of this section does not automatically stay the decision. However, the commissioner will impose a stay, on the commissioner's own motion or at the request of an appellant, if the commissioner determines that the public interest requires it.

(e) A decision takes effect immediately if no party is eligible to appeal or request reconsideration and the commissioner waives the commissioner's right to review or reconsider the decision.

11 AAC 02.070. Waiver of procedural violations.

The commissioner may, to the extent allowed by applicable law, waive a requirement of this chapter if the public interest or the interests of justice so require.

11 AAC 02.900. Definitions.

In this chapter,

(1) "appeal" means a request to the commissioner to review a decision that the commissioner did not sign or cosign;

(2) "appellant" means a person who files an appeal or a request for reconsideration;

(3) "commissioner" means the commissioner of natural resources;

(4) "decision" means a written discretionary or factual determination by the department specifying the details of the action to be allowed or taken;

(5) "department" means, depending of the particular context in which the term is used, the Department of Natural Resources, the commissioner, the director of a division within the Department of Natural Resources, or an authorized employee of the Department of Natural Resources;

(6) "request for reconsideration" means a petition or request to the commissioner to review an original decision that the commissioner signed or cosigned.

Appendix D SSE-1392-K Tuxekan Timber Sale Comments & Responses

Appendix E SSE-1392-K Tuxekan Timber Sale Forest Land Use Plan

Preliminary Best Interest Finding and Draft Forest Land Use Plan Tuxekan Timber Sale (SSE-1392-K)

Comments

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

The following commenters submitted input:

- Alaska Department of Fish and Game, Area Habitat Biologist, Mark Minnillo
- Alaska Forest Association, Executive Director, Tessa Axelson
- Southeast Alaska Conservation, Policy Analyst, Tyler Breen

The following comments were received during the public comment period on the Preliminary Best Interest Finding and Draft Forest Land Use Plan Tuxekan Timber Sale (SSE-1392-K)

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Commenter	Comment	Response
Preliminary Best Interest Finding		
	I. Proposed Action	
Tessa Axelson, AFA	...based on the aerial imagery used as background for the area map, there appears to be possible merchantable timber located in the southeast corner of the SESF parcel within the area map. AFA requests that this area be included within the BIF and FLUP for the timber sale as optional timber or timber subject to agreement so that the purchaser of the Tuxekan Timber Sale has the ability to choose to harvest that timber as part of the timber sale.	The DOF designed the sale to reflect contemporary markets, observed industry yarding methods and means, road feasibility and the State's management goals. The timber described is on steeper ground, in areas beyond normal yarding distance from the proposed roads and is generally of low economic or non-merchantable quality. The DOF will consider minor modifications to the sale boundary on a case-by-case basis
Tyler Breen SEACC	<i>Old-Growth Retention & Young-Growth Management Issues</i> Despite a stated goal of transitioning to young-growth management, DOF continues to prioritize old-growth harvests without developing a viable young-growth market. The Tuxekan sale perpetuates this contradiction by extracting old growth while acknowledging the lack of infrastructure or demand for young-growth processing. This approach not only undermines ecosystem resilience but also signals a failure to invest in the long-term future of Alaska's timber industry.	This sale is predominantly young growth timber. The DOF supports utilizing young growth timber in the interest of making sustainable forest resources available to support commerce. Regardless, the transition to young growth timber will likely happen regardless as the State is mandated to harvest its timber sustainably. Offering young growth timber encourages its local use as it becomes more prevalent.
	V. Project Location, Land Status, and Description	
	E. Background and description of proposal	
Tessa Axelson, AFA	<u>4. Unit Access</u> AFA requests that the DOF obtain all necessary permits and use agreements needed for the timber sale purchaser to operate the timber sale prior to selling the sale. This includes but is not limited to a facility and land use permit from Sealaska and a road use permit from the US Forest Service (USFS). DOF should also check on the validity of US Army Corps of Engineers (COE) permits, DNR tideland permits or leases and AK Pollutant Discharge Elimination System (APDES) permits. The USFS was issued a 55-year easement for the Nichin Cove Log Transfer Facility (LTF) in April of 2008; did the USFS retain the easement when the uplands were transferred to Sealaska? Whenever possible, DOF should obtain long-term access permits so that on-	Comment noted. Thank you for listing the extensive permitting and authorization needed to use a typical log transfer facility. The DOF made Sealaska aware of the proposed timber sale prior to issuing the BIF and FLUP. The DOF describes the projected access and facility requirements when it advertises the timber for sale. The USFS did not retain an easement at Nichin Cove.

Commenter	Comment	Response
	going forest management of the SE State Forest (SESF) and other State lands is not hindered at any time.	
	G. Costs and benefits	
Tyler Breen SEACC	<u>Costs and Benefits</u> Road construction and maintenance costs associated with the sale are likely to outweigh the revenue generated from stumpage fees. Historically, timber sales in Southeast Alaska have required significant state subsidies, often resulting in a net loss rather than an economic gain. There is no evidence that this sale would break from that precedent. Studies show that road-building in forested regions increases habitat fragmentation, sedimentation, and long-term maintenance costs.	The road construction and maintenance costs during the sale life are the purchaser's contractual responsibilities. The roads will be closed (AS 11.95.320) by the purchaser at the completion of the sale. Roads closed in this manner are not a financial burden to the State or categorically detrimental (ADF&G Wildlife Action Plan Appendix 5: Forest Habitats).
Draft Forest Land Use Plan		
	I. Introduction	
	B. Operational Period	
Tessa Axelson, AFA	The operational period listed in the draft FLUP is too short. AFA believes the period of time covered by a FLUP for forest management operations within the SE State Forest (SESF) should include post-harvest management of the area over a rotational period. The FLUP should address pre-commercial thinning and road management and maintenance over the rotation.	<p>Comment noted, the sale term and operational period are represented as five years.</p> <p>The DOF lists the operational period of the proposed harvest activity. Forest management activities beyond the timber sale are subject to funding authorization of the legislature.</p>
	III. Harvest Methods, Silvicultural Actions, and Management of Nontimber Resources	
	B. Timber Harvest Activities	
Tessa Axelson, AFA	In Table 1 of this section, it is stated that the entire sale will be harvested by Ground Based (Shovel) logging. Later in section E percent slopes are listed as 5% of the acres being over 50% with maximum slopes found in the unit as steep as 70%. With slopes that steep within the unit, is shovel logging feasible for the entire unit?	The DOF designed the sale based on the means and methods observed on recent State timber sales. Slopes under 35% are generally being harvested using shovel logging methods. The slopes over 35% were observed to be short in reach, and loggable from interconnected and accessible lower gradient slopes using directional felling of the timber.
Tyler Breen SEACC	<i>Failure to Meet Mandated Forest Management Practices</i> The Preliminary Best Interest Findings and Forest Land Use Plan state that forest operations must:	The DOF harvests on a sustained yield basis. Reforestation is mandated by the FRPA in a statutory timeframe regardless of ownership; reforestation in Southeast Alaska consistently occurs within a five-year window. The other primary mandate of the

Commenter	Comment	Response
	<ul style="list-style-type: none"> ● Protect fish habitat and water quality in compliance with best management practices (11 AAC 95.260-.370); ● Manage for multiple land uses as identified in AS 41.17.060 and the BIF; ● Ensure prompt reforestation and site productivity in compliance with AS 41.17.060(c) and 11 AAC 95.375-.3903. <p>However, when considering the impacts of this sale alongside historical deforestation and other nearby sales such as the Naukati sales, these mandates are not met. The cumulative effect leads to:</p> <ul style="list-style-type: none"> ● Expanded areas of disturbance, ● Decreased soil carbon retention, ● Increased erosion and sedimentation, ● Degradation of habitat critical for subsistence species. <p>The cited sources recommend that “...forest management need[s] to consider the regional disturbance regime”, which is not met with the continuation of canopy disturbance and cumulative impacts associated with this timber sale⁴.</p>	<p>FRPA regardless of ownership is the control of erosion and sedimentation; the FRPA has a track record over the last 30 years of maintaining soil and water quality through implementation of best management practices. This is documented annually in the BOF implementation reports to the Governor and the Legislature.</p> <p>Carbon retention in young and old growth stands in the southeast temperate rainforest is inherently high. Regardless of stand age, it is not mandated to be status quo or professionally recommended to be maintained at a benchmark.</p> <p>This project will change habitat that may be used by subsistence species such as deer.</p> <p>ADF&G acknowledged that this area may be seasonally important deer habitat given that it is proximate to saltwater and has canopy conditions that provide some cover. Given that it is removed topographically from the rest of the island (as a peninsula) and is not associated directly with extensive vertical or horizontal terrain, the usefulness of the area is observed to be localized.</p> <p>The specific area has not been identified as critical deer habitat by ADF&G. The ADF&G has observed the significant change in cover type on the island in the past 50 years from forest management. They also stated that the timber harvest consequence to deer population on the island may be significant. ADF&G categorically recommends retaining all timber within 1,000 feet of most shoreline as it typically offers useful winter habitat. Retaining this amount of timber would effectively preclude any timber harvest at this location given the peninsula is on average 2,000 feet wide. Reserving all the timber on the peninsula for habitat though is not in keeping with the land classification intent which considered the overall multiple use of the broader area.</p> <p>The subsistence potential of this peninsula appears to be low based on the limited evidence of deer remnants and trails. While</p>

Commenter	Comment	Response
		<p>the area is directly across from the community of Naukati, it is only tidewater accessible by beaches that are relatively steep and rocky with limited access for humans or deer. It is likely to receive little use for repeated subsistence hunting use.</p> <p>Dialog with ADF&G on this subject lead to them recommending the retention of timber within 300 feet of the beach at this location. The DOF examined the site in detail during the timber cruise and concluded that retained timber was subject to a high likelihood of disturbance. This is based on existing evidence in the stand from when it was harvested in the 1950's and the recent 10 acre Jinhi Bay salvage sale a quarter mile to the southeast. The Jinhi Bay footprint was completely blown over in the span of several years. The decision not to retain timber on the beach is the prudent decision at this location for long term forest health.</p>
	D. Slash Abatement	
Tessa Axelson, AFA	Slash abatement requirements in this section seem to conflict with statements in III. G. Wildlife Habitat regarding large woody debris and said debris being left in concentrations interspersed within the harvest unit. Please clarify how an operator both lops and scatters while concentrating large woody debris?	This section has been modified to better describe residual harvest conditions. Piling is intended to address residual utility wood; scattering is intended to focus on slash.
	F. Timber Harvest – Surface Water Protection	
Mark Minnillo, Area Habitat Biologist ADFG	<p><u>Fisheries</u></p> <p>ADF&G reviewed the maps included with the PBIF/FLUP as well as with the Atlas and Catalog of Anadromous Waters. There are no known anadromous nor fish-bearing streams located within nor adjacent to the proposed timber sale area.</p>	Comment noted, no change required.
Tyler Breen SEACC	<p><i>Water Quality & Fisheries Risks</i></p> <p>The proximity of the sale area to anadromous streams raises concerns about erosion, sedimentation, and potential contamination of aquatic habitats critical for salmon and other fish species. Given Southeast Alaska's dependence on healthy fisheries, any action that threatens water quality poses unacceptable risks to subsistence and commercial fishing economies.</p>	There are no anadromous streams in or adjacent to the proposed sale. Comment noted, no change required.

Commenter	Comment	Response
Tyler Breen SEACC	Additionally, the sale includes 2.65 miles of road construction, with 0.99 miles of reconstructed roads and 1.66 miles of newly constructed roads. This expansion of infrastructure further contributes to erosion risks, habitat fragmentation, and long-term impacts on forest hydrology. Especially in relation to landslides and further erosion risks, the road construction related to this sale presents the risk of increased associated turbidity in the waters surrounding the peninsula where the proposed sale is located.	<p>While cover and thus habitat will change with this timber sale, the ADF&G has not indicated that habitat fragmentation is an issue as the result of these new roads.</p> <p>There is a relatively low presence of surface waters evident in the sale due to the size of the area and the underlying karst geology. The terrain is moderate to low angled topography with short slope distances. There is no categorical indication that landslides are a risk. Soils are generally organic with an inherent cohesive profile. Turbidity of water from soil disturbance associated with this timber sale activity into the surrounding bay is unlikely. The roads will be managed under the best management practices of the FRPA. The FRPA best management practices have historically maintained water quality and adequately managed sedimentation risk to surface waters by maintaining soil integrity.</p>
	G. Wildlife Habitat	
Tyler Breen SEACC	The proposed sale threatens key wildlife habitat by increasing fragmentation and removing vital old-growth structure that supports species such as bald eagles, Sitka black-tailed deer, black bears, wolves, and other mammals. Additionally, the area provides critical habitat for Marbled Murrelets, Queen Charlotte Goshawks, Peregrine, Falcons, and Osprey. The lack of adequate buffers for wildlife corridors further degrades habitat connectivity, reducing the ability of these species to persist in the region.	<p>The historic bald eagle nest locations and habitats are documented in the USF&WS database they have been retained. DOF staff did not observe other eagle nests.</p> <p>Old growth forest structure is not a significant aspect of the timber sale. Regardless, there are no other site-specific habitats for the species referenced in the sale per ADF&G.</p>
Tyler Breen SEACC	<p>Cumulative Impact</p> <p>Figure 1. The satellite image shows a forested landscape with canopy disturbances from 2001 to 2023 highlighted in pink. The disturbed areas are scattered throughout the image, showing a patchwork of fragmented forest cover. Large clusters of disturbance are visible on the left side of the image, with additional patches extending inland and along waterways. The image captures a region where extensive logging and other land-use changes have altered the forest structure, illustrating the cumulative nature of past timber harvests. The continued fragmentation of these landscapes further threatens habitat</p>	While the site is proximate to saltwater, the stand location is not associated with specific habitat values or connecting higher value habitat landforms. This young growth stand is the result of some of the first significant forest management activity in Sea Otter Sound approximately 70 years ago. While there are some incidental residual trees that were left in the stand at the time of that harvest, they are scattered throughout and do not define the stand characteristics as old growth. As such, the stand has been represented as isolated and serving to a lesser extent as wildlife habitat and conveyance. While the other forest management noted is extensive, its significance to this action has not been indicated

Commenter	Comment	Response
	connectivity and long-term ecological resilience.	by ADF&G.
Mark Minnillo, Area Habitat Biologist, ADFG	ADF&G expects the overall impact of this timber sale on the Game Management Unit 2 (GMU 2) deer population to be minimal. However, taken together with the other timber harvest that has occurred within GMU 2 (specifically on Tuxekan Island), the cumulative effects of timber harvest on deer populations may be significant. ADF&G recommends retaining all timber within 1000 feet of the shoreline to maintain important deer winter habitat.	Retaining timber within 1,000 FT of the shoreline would preclude forest management at this location as there would not be a significant area to harvest and generate revenue to offset the cost of road construction and mobilization. Consequently, DOF entered discussion with ADF&G, and they reevaluated and updated their request to retain 300 feet of timber along the beach considering the land management classification. While the DNR respects ADF&G's request, considering the lack of other timber available on the Tongass DNR does not have the land resources to categorically reserve timber adjacent to tidal waters and meet the Commissioner's intent to keep the timber industry functional.
	There are no known bear or wolf dens located within the proposed harvest area nor on Tuxekan Island.	Comment noted, no change required.
	ADF&G recommends no harvest in needleleaf forest peatland where western toads and rough-skinned newts are likely to occur, and to have a no-harvest buffer of 50 feet around seeps and streams, which are important for toad overwinter survival.	The DOF discussed this issue with ADF&G. The implementation of FRPA best management practices for surface waters adequately mitigates this specific habitat concern.
	ADF&G recommends retaining snags for bat habitat and maternity roosts.	Comment noted, no change required. The DOF has been doing this for several years.
	Appendices	
	Appendix A: Timber Sale Maps	
Tessa Axelson, AFA	There is a difference on the western side of the harvest unit in the unit boundary between the maps in Appendix A1 and Appendix A2. Which of the proposed harvest unit is correct? AFA request that the correct map be used in all Appendices.	Commented noted, the maps have been aligned.