

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



Coastal Region-Southeast Area Office

Best Interest Finding

Odyssey Timber Sale
SSE-1391-K

March 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 timber from approximately 600 acres of mature old growth timber composed of western redcedar (*Thuja plicata*), western hemlock (*Tsuga heterophylla*), Sitka spruce (*Picea sitchensis*) and Alaska yellow-cedar (*Chamaecyparis nootkatensis*) from Southeast State Forest (SESF) lands, General Use and Settlement classified lands on northern Prince of Wales Island (POW). The planning areas are in the El Capitan and Whale Pass area. (see Appendix A, Timber Sale Area Map). The volume to be offered totals approximately 6,000 thousand board feet (MBF). The DOF proposes to sell the commercial timber in one or more negotiated sales under provisions of AS 38.05.118. Negotiated timber sale methods have been chosen because of the State's interest in encouraging employment on POW by processing as much of the timber locally as feasible.

The DOF designed and offered timber in the area between 2020 and 2024 (El Capitan timber sale) that fit the perceived markets at the time. Operators have since indicated a desire to also operate on lower volume per acre stands or in areas removed from the existing road system more so than typically considered feasible in the past. This perspective is driven by the value of the red cedar in these stands. The willingness to do this is twofold: Alternative timber supplies do not exist in the region and the market for redcedar appears to be stable and lucrative enough for all sorts of redcedar sawlogs to sustain the economics of operating in these stands. The DOF intends to offer the timber as purchaser layout and use its standard request for proposal process (RFP) to determine the specific purchaser(s) with whom to negotiate the final configuration and conditions of the timber sale. The RFP process will consider the track record of the purchaser to design and manage timber harvest, locally manufacture wood products (AS 38.05.118), the proposed quantity of value-added wood products to be produced, the projected payroll associated with processing the sale, and the proposed stumpage rates. Selling the timber in an open and competitive manner using the AS 38.05.120 authority in Southeast Alaska would likely generate higher stumpage revenue to the State. Purchasers of competitive sales typically use the round log export market and obtain higher returns on their investment. A competitive sale using the AS 38.05.120 authority could not be constrained through contract language to use local mills as much as feasible.

The management objectives for the proposed timber sale area are:

1. To follow the Alaska Department of Natural Resources' (ADNR) constitutional mandate to encourage the development of the State's renewable resources, making them available for maximum use consistent with the public interest;
2. To help the State's economy by providing royalties to the State in the form of stumpage receipts, an infusion to the State's economy through wages, purchases, jobs, and business.
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-1391-K.

IV. SCOPE OF DECISION

This best interest finding (BIF) is part three of a six-part process to design, sell, and administer timber sales. This BIF covers the sale of approximately 600 acres of mature old growth forest composed of western redcedar, western hemlock, Sitka spruce, and Alaska yellow-cedar on state land within the perimeter of the project area (see Appendix A1, Timber Sale Area Map). 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 project area in this BIF is covered by the Southeast State Forest Management Plan and the Prince of Wales Island Area Plan. The Land Classifications of the areas are Forestry, General Use and Settlement.

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. The areas of this sale were in the 2026-2030 FYSTS.

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

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

Part 4: Forest Land Use Plans (AS 38.05.112). Prior to authorizing harvest of timber on any area greater than 10 acres, the DOF must adopt a site-specific Forest Land Use Plan (FLUP) for the harvest area. DOF will prepare draft FLUPs for the harvest areas 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 FLUPs also address 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 are 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 on Prince of Wales Island and found within:

SESF El Capitan North and South Subunits: Section 36, T65S, R78E; Section 31, T65S, R79E, Sections 1, 12, 24, 25 T66S, R78E; Sections 6, 7, T66S, R79E, all in Copper River Meridian (CRM).

Whale Pass Addition Subunit 5a: Sections 1, 12, T67S, R79E, CRM.

Exchange Cove Subunit 1b: Sections 29, 32, T65S, R80E, CRM.

The sale area is found within the Petersburg A-4 USGS quadrangle.

See Appendix A1, Area Map, Best Interest Finding, SSE-1391-K Odyssey Timber Sale.

B. Title status

El Capitan North and South Subunits: National Forest Community Grant 341 (Patent No: 50-96-0692) and 385 (Patent No. 50-96-0694).

Whale Pass Addition Subunit 5a: National Forest Community Grant 148 (Patent No. 50-89-0135) and 229 (Patent No. 50-96-0566).

Exchange Cove Subunit 1b: National Forest Community Grant 338 (Patent No. 50-96-0599).

C. Land use planning, classification, and management intent

The El Capitan subunits are predominately in the SESF. The land at Exchange Cove is General Use. The Whale Pass land is predominately General Use with a small area on the north end of the tract classified for Settlement where the access road has been proposed. The State of Alaska's Division of Forestry and Fire Protection (DOF) is the land manager within this SESF while the DMLW is the land manager for the land in Whale Pass and Exchange Cove. The DOF is the manager for the forest resources on all the identified State land.

The area land management document for the State Forest is the Southeast State Forest Management Plan (SESFMP), adopted on February 29, 2016. 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 area management plan for the Whale Pass and Exchange Cove subunits is the Prince of Wales Island Area Plan (POWIAP).

The intent for the Whale Pass Addition is:

“State lands will be managed for multiple use, with an emphasis on meeting the needs of the developing community, providing a timber supply base, and protecting the most valuable recreation and fish and wildlife habitat and harvest areas. Use of the log transfer site on the west side of Whale Pass is expected to continue. Future industrial activities are encouraged to locate on state lands south of the log transfer site. With the exception of areas identified for settlement and public facilities at Whale Pass, all state lands will remain open to mineral entry.”

Forestry

Management Intent:

“Timber harvest is considered an appropriate use in areas designated “Gu” (General Use) or “S” (Settlement) subject to the requirements of this plan (Chapter 2) and the results of the Forest Land Use Plan planning process. Harvest siting and design must consider the need for use separation buffers, important habitat and wildlife areas, and the protection of viewsheds important to the community in the development of the Forest Land Use Plan. All harvest operations must provide a buffer that separates the existing and any planned subdivision areas with areas of timber harvest.”

The overall intent for the Exchange Cove Subunit is:

“State uplands tidelands and submerged lands will be managed for multiple use. Management emphasis for state tidelands and submerged lands at Exchange Cove is for important habitat values, especially near the head of the cove. State uplands will be managed for multiple uses, including settlement, recreation, and forest harvest. Uplands adjacent to the coast (within 400 feet of the coast) will be managed for waterfront development of water-dependent or water-related activities, with other activities encouraged to locate first at Whale Pass, and second, if Whale Pass is not feasible, above the road at Exchange Cove. The intention for this management is to minimize impacts on the high habitat values of the cove and to reduce demand for new services that may already exist at Whale Pass. No residential land disposals are planned at Exchange Cove. State uplands, tidelands, and submerged lands in this subunit will also be managed to protect the most important recreation and fish and wildlife habitat and harvest areas. All state lands in this subunit will remain open to mineral entry. Lands proposed for disposal during future planning efforts are closed to mineral entry prior to sale.”

Forestry

Resource Information:

“Areas with commercial grade forest occur throughout the tract. Large portions of the tract some distance from the coast have been previously harvested.”

Management Intent:

“Timber harvest may occur in portions of this tract subject to the standards of Chapter 2 and any stipulations that may be imposed as a result of the Forest Land Use Plan planning process. Timber harvest operations should ensure protection of the coastal fringe and should coordinate with any planned industrial or commercial use.”

The Interagency Fire Management Plan includes all state lands in the project area in the modified or full protection category.

D. Current access and land use

The proposed sale area is generally accessed using the POW road system, specifically the only main north/south paved road leaving the north side of the Naukati community road junction. This route is generally considered part of the Alaska Highway System. At the end of the northern extent of pavement, the El Capitan area is reached via the northly unpaved 2000 Road. The Whale Pass area is accessed by taking the easterly unpaved road referred to as the Neck Lake Road or the 2500 Road.

Most of the El Capitan subunit is located off the 2000 Road west of Twin Lake on the Prince of Wales Island Road system near the junction of the 2700 Road.

The Whale Pass Addition subunit is located south of the Neck Lake Road (USFS 2500 Road) on the Prince of Wales Island road system just prior to entering the community of Whale Pass.

Exchange Cove is north of Whale Pass approximately 8 miles on the 3000 Road.

Whale Pass is the nearest community to all these areas. The adjacent public landowners are the United States Forest Service (USFS) and the second-class City of Whale Pass.

The state subdivision ASLS 2000-0022 (Plat 2000-18) is on the north end of the Whale Pass Addition subunit. These lots are a mix of raw land and developed residential activity.

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

The USFS managed the project area and conducted timber harvest and other forest management activities prior to State conveyance; the project area contains numerous forest roads managed by the USFS which were constructed and maintained to agency standards for commercial timber operations. The USFS retained the mainline road right-of-way throughout the area and is the responsible agency for management and maintenance of most of the road system. The USFS stated they grade the mainline roads three times a year outside of any timber sale activity. The USFS retained an easement for an administrative site to the northeast of the Whale Pass Addition which contains an idle log transfer facility. The LTF is used to launch boats and has incidental camping occurring on it by the public. The Federal Highway Administration has designed upgrades for the Neck Lake Road and has advertised for those improvements. That work may occur during the timeframe of this timber sale.

The City of Whale Pass performs limited local road system maintenance within the community.

Privately rented cabins are present in the Whale Pass community. The focus of these cabins is generally associated with the semi-remote location and self-guided fishing of the larger freshwater streams such as the 108 Creek and the associated estuary area of Whale Pass during summer and self-guided deer hunting during fall. Several full-service guided sport fishing lodges are also in the area and focus more on offshore saltwater fishing.

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

The USFS maintains an established and permitted Log Transfer Facility (LTF) on a small island connected to POW by a road causeway in El Capitan Passage. The LTF has not received use in the last decade other than for moving heavy equipment by barge to the north end of POW. The El Capitan LTF also has a primitive boat launch that receives use by residents and fishing charter operators accessing the west coast of POW. The USFS has listed the ramp as a recreational improvement project in the POW Landscape Level Analyses. Several groups were observed camping at various times on the LTF uplands during the State timber sale planning fieldwork. The LTF was reconstructed in the fall of 2024 and is currently supporting a State timber sale in the area.

A quarter mile east of the El Capitan LTF, there is an established trailhead to the El Capitan cave, a karst interpretive site and an old USFS administrative camp area that the public uses for staging remote activities. The cave and karst interpretive site, although promoted and staffed by the USFS in the past decade, has received limited use and has been subject to funding constraints. The USFS also has an administrative cabin and a dock adjacent to the site. The dock is used by the public for transient boat moorage. The USFS recently rebuilt the interpretive site and constructed a public use cabin on saltwater adjacent to it.

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

The southeast quarter of Section 11 was subdivided by DMLW, and some lots were sold in the 2022 State Land Offing. None have been developed to date.

While the proposed timber sale area is relatively remote, the public does use the areas in general for incidental semi-remote use including, but not limited to foraging, hiking and hunting. Most use appears to be proximate to the existing road systems or saltwater and is not regularly utilizing the overall land identified.

The DOF sold a 628-acre timber sale in 2024 to Viking Timber LLC. The sale is adjacent to the El Capitan and Whale Pass areas described in this document. Viking operated in the area in the latter half of 2024.

Sealaska Corporation is the Regional Native Corporation; there is no Native Regional Corporation or Native Village Corporation land adjacent to the timber sale.

E. Background and description of proposal

1. Background:

The State seeks to use State Forest land on Prince of Wales Island to encourage sustainable development of the State's Forest resources, making timber available for sale and harvest. The demand for State timber is without precedent due to the decrease and uncertainty of the federal timber supply, and the lack of timber sale offerings from private and Trust lands within the region. A diversified economy with a timber industry component is relevant to the resiliency of southeast Alaska given its history, the large amount of forest and the remote setting. By direction from the Governor and Legislature, the Division of Forestry & Fire Protection manages a timber sale program that makes timber volume available to help sustain the region's timber industry and economy. Much of the State's land base in southeast Alaska is remote. The POW area contains a large amount of raw land that is relatively proximate to the existing road system and offers forest resource values close to the remaining mills and processing facilities. POW is also home to a skilled local work force. The legislature designated most of the state land in the area as State Forest in 2010 and 2011. The DOF has been managing these lands for forestry purposes since that time.

In part because of the lack of timber supply in the region but also because the SESF contains a significant amount of low volume per acre timber, the DNR Commissioner has directed DOF to: solicit sale-specific input from industry, provide more flexibility in timber sale configuration(s) and development procedures, and reflect market opportunities for high value species such as redcedar that tend to grow in these areas that are perhaps currently underutilized. This proposed timber sale targets areas that are difficult to economically operate and have been passed over previously based on operational norms, and not due to environmental reasons or concerns. By utilizing purchaser layout, the DOF intent is to expand its knowledge of low volume sites, validate operational thresholds associated with marginal timber stands, and provide commercial timber harvest opportunity.

2. Timber Volume and Sustained Yield:

The total estimated saw log volume identified in this sale may be as much as approximately 6,000 thousand board feet (MBF) based on inventory and past comparable state timber sales.

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. The DOF intends to use a contract term of five years with this sale.

3. Harvest Unit Design:

Reconnaissance by the DOF and consultants in 2019 indicates that the sale areas are generally harvestable using ground-based logging techniques. Unspecified methods of maximizing harvester range may be considered such as developing hog fuel trails and supporting operations with a helicopter are being

contemplated. Whatever logging system used will need to take advantage of directional timber falling techniques and utilize benches and uneven terrain to access the isolated timber. Areas of wet and or saturated soils will require adequate puncheon of the skid trails to minimize impacts to 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.

4. Unit Access:

Unit access is a function of timber location and has not been developed to date. The existing USFS and State road infrastructure will provide the backbone for the access. Where necessary permits will be secured from the USFS. Permits for the use of the roads will be the responsibility of the purchaser.

5. Agency Review and FLUP Development:

As part of the timber purchase agreement, the DOF and the timber purchaser will in good faith work together constructively to develop consensus on the location, configuration, harvest methodology and utilization of the timber in the timber sale area and within individual harvest units. The purchaser will be responsible for developing and completing the proposed unit layout; both conceptually, and in the field. The purchaser will submit a proposed layout that it has field located for DOF review and approval in the form of a draft FLUP. The decision to authorize the harvest or construct supporting road will reside with DOF.

F. Resources and management

1. Timber

a. Timber Stand Composition and Structure:

Western redcedar, western hemlock and Alaska yellow cedar are the primary commercial tree species, with minor amounts of Sitka spruce dispersed throughout the old growth timber stands identified. The timber overall contains common defects such as sweeps, crooks, mistletoe, fruiting bodies/conks, and dead or broken tops. Windthrow is the major natural disturbance observed within the stand. The inventory polygons associated with these proposed areas are a mix of Strata 1 (less than 10 MBF/ acre) and Strata 2 (10-20 MBF /acre). Isolated patches of higher strata timber types may also intermix because of site variability. Timber types are assigned based on interpretation of satellite imagery and/or aerial photos to identify, delineate and classify timber stands based on species, size, and density. Timber in Southeast Alaska within these low strata may provide commercial harvest opportunity, but only if they are accessible and contain a sufficient volume and value of timber. Timber stands growing on lower quality sites may not produce enough sawlogs or fiber on a per acre basis to cover the fixed costs necessary to access it, harvest it, and move it to market. Often these low stratum areas occupy poorly drained sites with poor aspect (shaded) where overall the timber is scrubby, short and defective. Better quality timber within the low strata typically occupies raised micro-sites with good drainage, and small ridges and slopes near surface waters with deeper mineral soils having better drainage and site aspect than the bulk of the timber within the stand.

b. Stand Silvics:

These low-volume, low-site old growth timber stands vary in age, volume strata and species composition. For the most part, this type of site responds to disturbance and grows native trees

slowly. A high-water table is typically a dominate feature with a shallow soil profile. The potential for propagating higher growth rates is not a practical consideration. Like most sites in Southeast, but even more so due to the lack of soil, the timber is often growing on rock outcrops and remnants of previous tree carcasses in the soil that provide site position and drainage. Regrowth in these timber types is not expected to produce young growth sawlogs that are within the rotational periods associated with the higher site classes of commercial timber types (80-120 years). For this reason, the DOF categorically does not include Strata 1 in the inventory calculations of the commercial timber base and the annual allowable cut; it is not considered significant in terms of rotational timber management. Harvest in these timber types is considered incidental. Where it does occur, it is accounted against the basis of the AAC and thus a conservative harvest is obtained overall. If operations in these low site areas becomes significantly relevant to the overall land base, DOF's perspective may change.

Regenerating stands of even-aged hemlock-spruce-cedar border most of the stands under consideration and the existing roads. Most of these young growth stands on State land were harvested by the USFS and then later selected and transferred to the state. Most have not been thinned as they were acquired prior to the state having a significant forestry program in Southeast. For the most part they are past the typical age range (25-35 years) that they would benefit from pre-commercial thinning.

Stand improvement such as pre-commercially thinning overly dense stands has 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 in the residual stems. This typically increases piece size and uniformity at the rotation age. Pre-commercial thinning Strata 1 sites is not typically done for commercial forestry reasons due to the low expected return on the investment. Thinning is also well recognized as an effective treatment to improve deer habitat in young growth timber stands, regardless of site quality, and on low quality sites, the habitat benefits of thinning are expected to persist over longer periods of time than on higher quality growing sites.

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). Natural regeneration on all disturbed sites in Southeast has been shown on average to meet FRPA minimum reforestation requirements within five years. 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. The DOF expects some delayed reforestation on these sites due to the low site.

Natural regeneration is the preferred regeneration method for this sale, and it is anticipated that adequate stocking levels will be achieved within 10 years after harvest. 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 some mineral soil access and micro relief on the large slash and skid trails.

Sitka spruce and western redcedar are the preferred species for reforestation. Redcedar will likely be the favored and dominant species due to its abundance, anticipated increase in available light, nutrients and scarification in the units during harvesting operations and its tolerance of poorly

drained soils. Scarification disturbs the vegetative mat making it available to degrade the protective seed coatings which in turn provides a more stable and receptive seed bed for germination.

d. Topography and Soils:

All of the sale area is located on rolling near-coastal terrain approximately 400 feet above sea level. Predominant geology is sedimentary conglomerate mixed with a limestone bedrock overlain with brown mineral and organic soils. Steeper slopes contain moderately well-drained soils. Benches and more level terrain generally contain poorly drained soils including areas of saturated soils.

Karst features will be identified as part of the purchaser's layout responsibilities. These karst features when encountered will be managed during operations to ensure operational safety and to maintain the hydrologic functions they provide to the area. At a minimum proposed operations will plan to minimize soil disturbance and slash introduction adjacent to features such as sink holes, caves or exposed limestone fins.

2. Wildlife habitat and harvest.

As required by AS 41.17.098, DOF provides due deference to ADF&G to ensure all wildlife habitat issues are addressed by the proposed timber sale design. The proposed timber sale was identified in the 2026-2030 FYSTS sent to ADF&G. No specific design issues have been identified by ADF&G.

The United State Fish and Wildlife Service (USFWS) publishes a geodatabase of identified bald eagle (*Haliaeetus leucocephalus*) nest locations. Per 11 AAC 95.340 (c), the DOF avoids the nest locations in the planning of state timber sales. No eagle nest locations were indicated by the database or previously observed in the field, but foresters performing purchaser layout are responsible for identifying and protecting any so far unidentified or undocumented eagle nest trees that may exist in the sale area.

Evidence of Sitka black-tailed deer (*Odocoileus hemionus sitkensis*) (tracks/scat/sightings) and black bear (*Ursus americanus*) (tracks/scat) was observed throughout the proposed timber sale area during several reconnaissance trips. ADF&G indicated in the preparation of the El Capitan and Whale Pass timber sale, the importance of timber stands for deer habitat in areas adjacent to that proposed timber sale areas that had larger and more dense timber types. The timber referenced and retained in those areas is not part of this proposed sale.

The ADF&G in its comment on the timber sale requested retention of timber near all saltwater shorelines and strips of timber of sufficient width and location to facilitate wildlife movement between forested landscapes outside the timber sale and in particular the saltwater shoreline. The DOF intends to retain some timber to meet both of these objectives based on field evidence of wildlife (deer). The likely wind firmness of the retained timber and other resources present will be considered as will the operational impacts of working around the retention strips and the value of the timber.

Retention of timber bordering the estuary below the road at Exchange Cove is a documented requirement in the POWIAP for wildlife habitat and its associated human use with development in the area. Based on this objective and ADF&G confirmation during the review of the PBIF on its importance, timber below the road is not available for harvest in Section 29 or Section 32. DOF may authorize individual timber harvest east of the road on a site-specific basis for operational safety.

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

The proposed sale area 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. None of the streams are projected to have significant habitat potential. Regardless ADF&G has indicated that they will verify several potential streams that are indicated by aerial imagery and past work in the area during timber sale layout and the FLUP review.

Operations adjacent to cataloged anadromous habit are not anticipated. There may be some potential for operations next to streams that are tributary to cataloged and uncatalogued streams that are over 12% at these sites. Due to gradient, these streams are all unlikely to contain fish habitat. Standard best management practices will be implemented on all surface waters to maintain existing water quality.

4. Recreation, Tourism, and Scenic Resources.

There are no known commercial recreation operations that use the proposed sale area where harvest will occur. Residents and visitors alike use the numerous roads on POW to access nearby areas for firewood cutting, hunting, foraging, hiking, and wildlife viewing uses among others. Incidental uses such as these will be limited during active harvest operations. Scenic resources will be temporarily altered due the removal of trees, though visual impacts will be limited in due to size and remoteness of the harvest areas.

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. No cultural sites have been identified.

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 previous operations, industry sources and the United States Forest Service. Access and operating costs for this sale are projected to be covered by the average fair market log value.

One management goal for the timber sale is to encourage as much of the timber as is economically feasible to be locally processed in Southeast Alaska. While scoping past decisions in the communities on POW, several commenters thought it appropriate that small mill operators be provided the opportunity to benefit from some or all the timber. Partitioning the timber into smaller blocks and over a longer period is typically also suggested. The use of a competitive process is a reoccurring comment due to interest in the timber. The DOF has sold significant amounts of timber in the area through a negotiated or the Request for Proposal process to the smaller mills located in Goose Creek and to the larger mill owned by Viking Lumber Company in Klawock. The DOF will continue a similar approach in southeast to the

extent that timber sale project economics and budgetary conditions make it prudent. Past sales this far north on POW have not been of interest to operators in the Goose Creek area.

DOF will encourage domestic processing to the extent feasible at the time of sale. Historic removal costs and value of the timber present indicate that some of the smaller hemlock and spruce timber may need to be exported in the round to generate adequate return for expenses. Given the timber type that most of the sale will operate in, this small hemlock and spruce sawlog is expected to be a minor timber component harvested. Where this type of small merchantable timber is cut, it will be utilized. Current utilization standards in other State timber sales require the recovery of #3 sawlogs with a gross volume greater than fifty board feet (#3 sawlogs as defined by the Pacific Northwest Log Scaling and Grading Bureaus).

The DOF and operators are already working in the vicinity of the proposed timber sale. Historic sale administration costs will be adapted to represent the DOF's administration costs per 11 AAC 71.045 for this proposed timber sale. The base rate(s) will be reviewed at the time of negotiation to confirm that they adequately provide the financial resources needed by the State to administer the sale. The minimum stumpage cost the State will consider for sale of the timber will be the estimated administration cost of this sale. A nominal stumpage royalty to the State above the administration costs (the base rate) may be possible but is unlikely given the nature of the timber type, the extended operating ranges being considered and the current market risk in the industry. This "at cost" stumpage rate supports one of the goals of this timber sale, to provide underutilized timber to an industry that is currently without options to purchase timber from other forest landowners/managers in the area.

Based on past performance, the DOF projects that a purchaser with a variety of resources is needed to operate and attract the monetary and human capital to access the site(s). Due to the expected low timber volumes and values present, a highly integrated organization will be necessary to sustain operations and understand market feasibility that match the potential of the timber type present.

Access may be improved on State Forest land and other classifications for future management which increases the long-term operational flexibility of the land and forest to meet its respective purposes. Once access is developed in an area it is much more likely the land can support other land uses, active forest management activities or future harvest entries.

While the DOF 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 will consider leaving the road systems open or inactive if demand for firewood is indicated by the community. At this time there is projected to be significant firewood resources located within several miles of all these locations resulting from other State timber sales.

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 18, 2025. Notices were also posted at the Ketchikan, Craig, Wrangell, and Petersburg 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; the Island Post; and the Petersburg and Wrangell papers.

VII. PUBLIC COMMENT

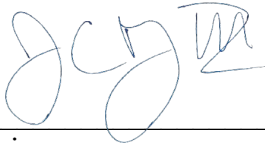
DOF received in a timely manner one agency comment from ADF&G on the Preliminary Best Interest Finding noticed. Comment focused on recommendations to retain some areas in proximity to the proposed harvest area for wildlife travel corridors and winter habitat, specifically for deer. The ADFG Division of Habitat affirmed their intent to verify several streams in the area for potential fish habitat during the development of the FLUP.

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. DISCUSSION, FINAL FINDING AND DECISION

After due consideration of all pertinent information, the ADNR has reached the following preliminary decision: to offer for sale approximately 600 acres of old growth timber composed of western red cedar, western hemlock Sitka spruce, and Alaska yellow cedar on Southeast State Forest land and other State land. Harvest activities on the Southeast State Forest lands will follow the management intent of the of the Southeast State Forest Plan. Activities on other State land will follow the management intent of the Prince of Wales Island Area Plan. The DOF finds that this decision satisfies the objectives stated in this document and it is in the best interest of the State to proceed with this action under its authority 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

3.7.25

Date

X. RECONSIDERATION

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

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

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

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

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

XI. APPENDICES

Appendix A SSE-1391-K Odyssey Timber Sale Area and Unit Maps (5 pages)

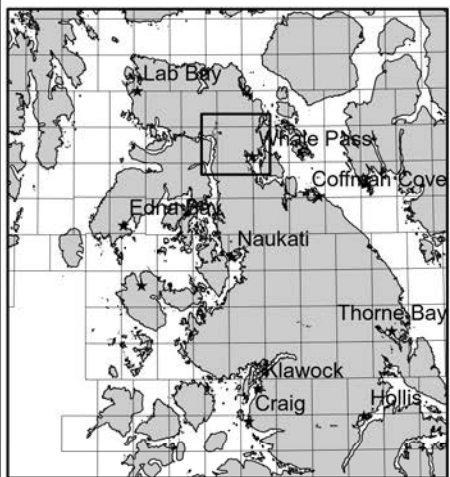
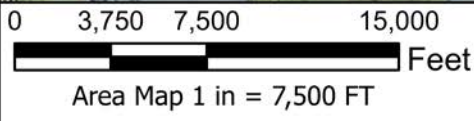
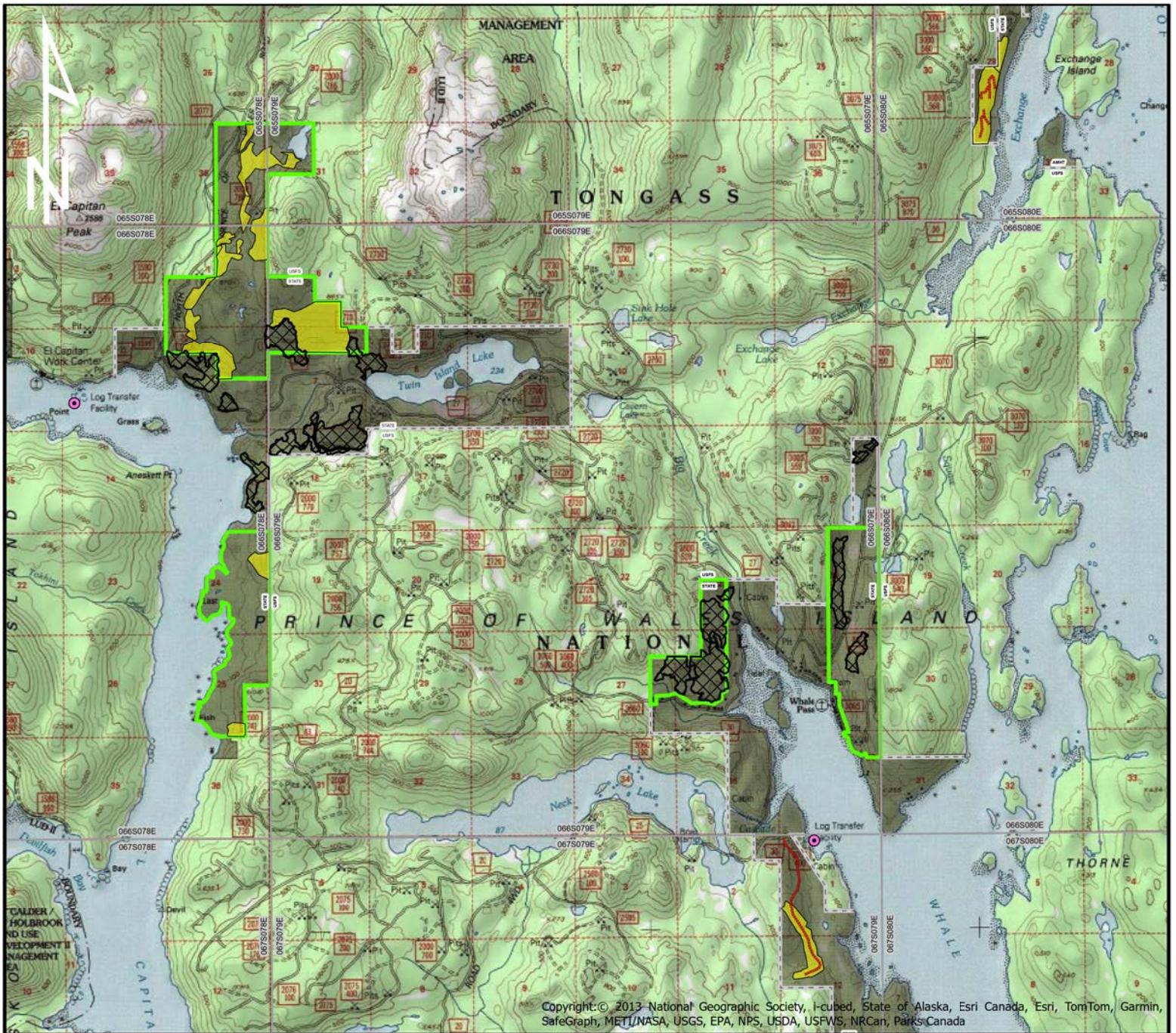
Appendix B References

Appendix C Appeal Regulations

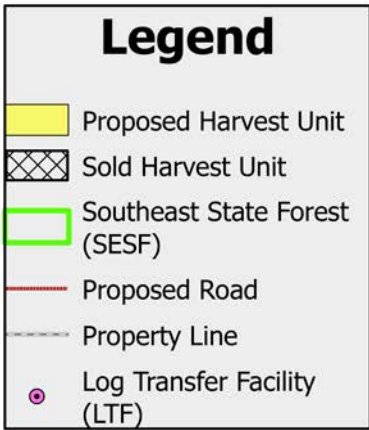
Appendix D SSE-1391-K Odyssey Timber Sale Comments & Responses

Appendix A SSE-1391-K Odyssey Timber Sale Area and Unit Maps

(5 Pages)

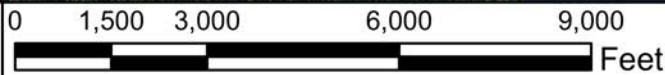
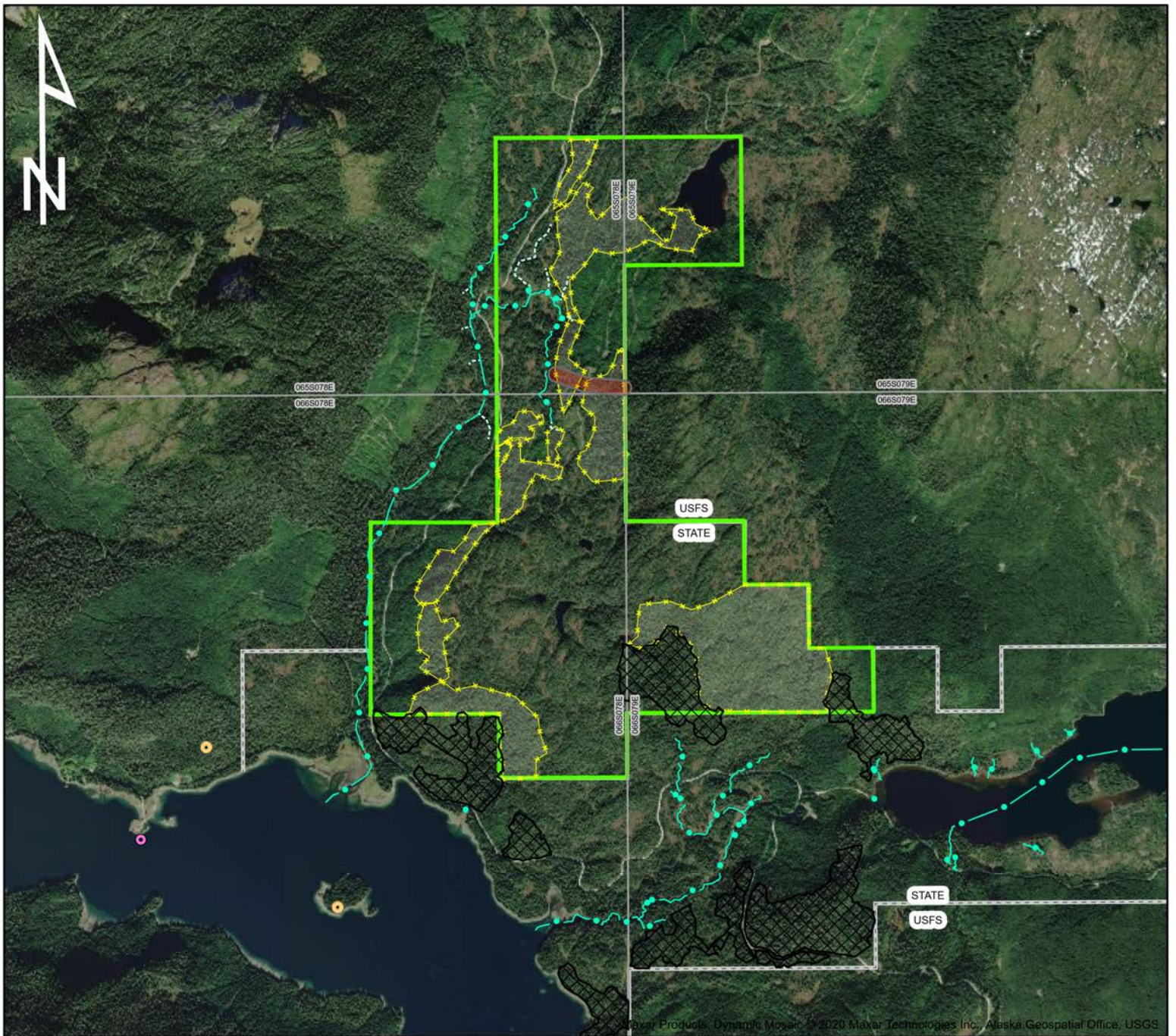


Vicinity Map 1 in = 32 miles

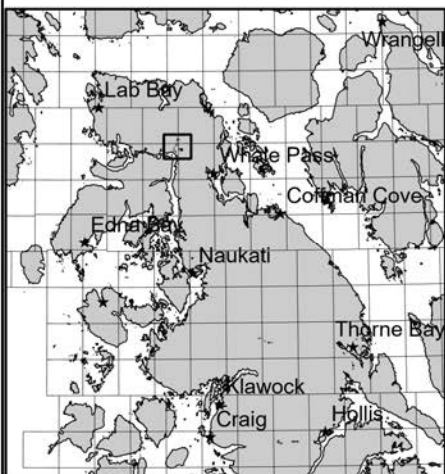


APPENDIX A1 SSE-1391-K ODYSSEY TIMBER SALE AREA MAP

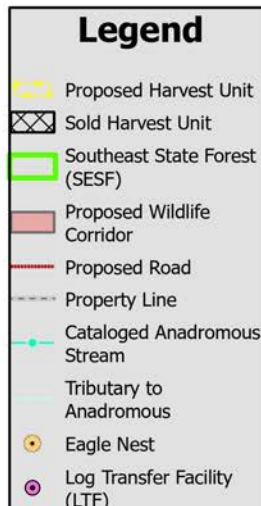




Area Map 1 IN = 3,000 FT

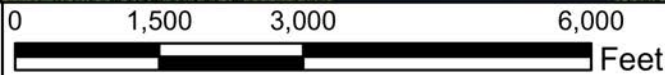
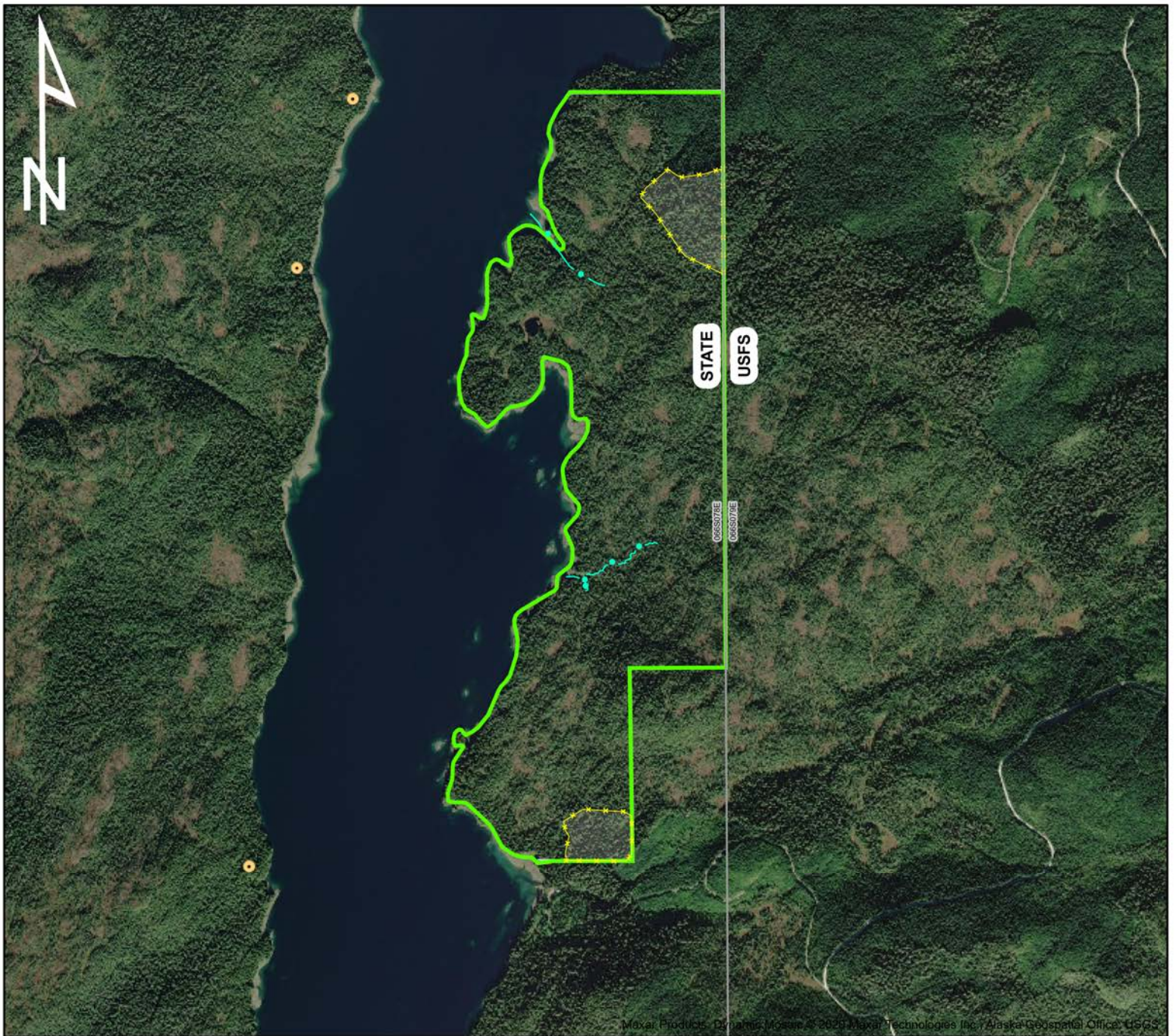


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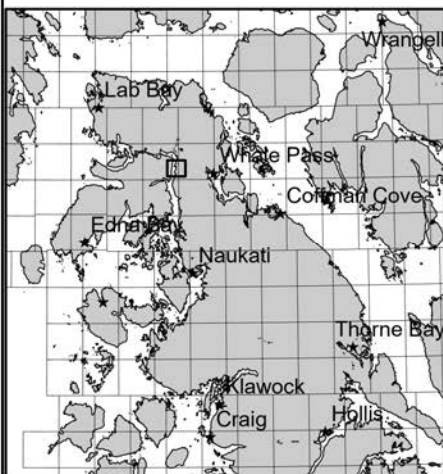


APPENDIX A2 SSE-1391-K ODYSSEY TIMBER SALE EL CAPITAN NORTH SUBUNIT





Area Map 1 IN = 2,000 FT

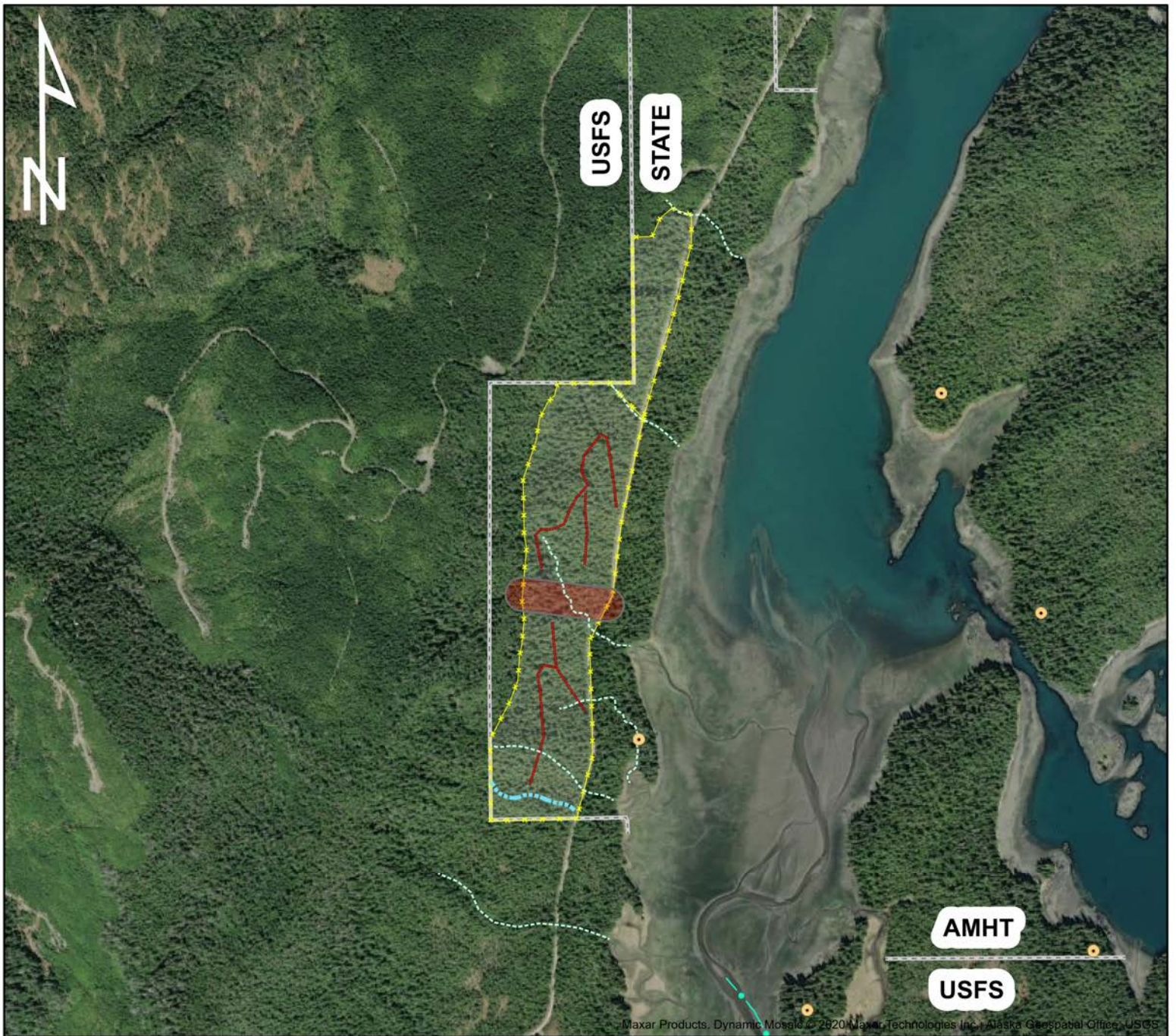


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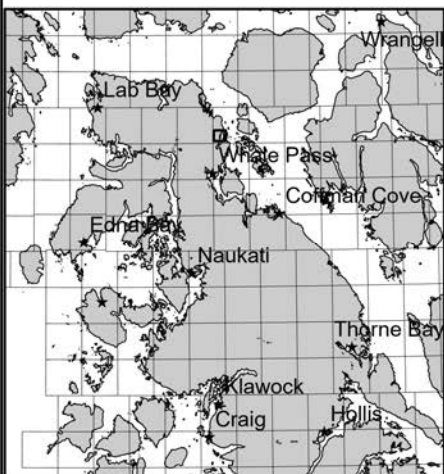
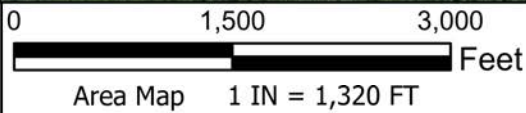
Legend	
	Proposed Harvest Unit
	Sold Harvest Unit
	Southeast State Forest (SESF)
	Proposed Wildlife Corridor
	Proposed Road
	Property Line
	Cataloged Anadromous Stream
	Eagle Nest

APPENDIX A2
SSE-1391-K
ODYSSEY TIMBER SALE
EL CAPITAN SOUTH SUBUNIT





Maxar Products, Dynamic Mosaic © 2020 Maxar Technologies Inc. Alaska Geospatial Office, USFS



Vicinity Map 1 IN = 32 miles

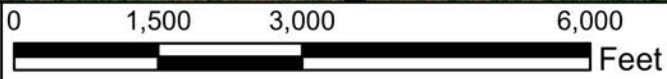


APPENDIX A2
SSE-1391-K
ODYSSEY TIMBER SALE
EXCHANGE COVE SUBUNIT 1B

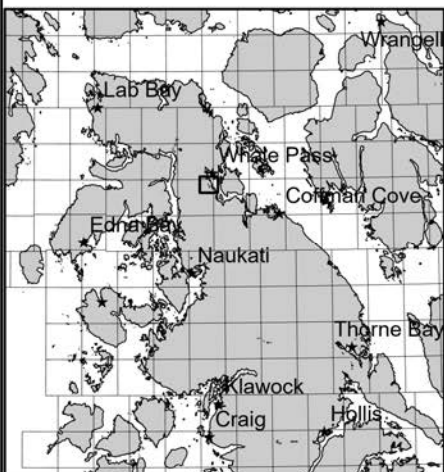




Maxar Products: Dynamic Mosaics © 2020 Maxar Technologies Inc., Alaska Geospatial Office, USGS



Area Map 1 IN = 2,000 FT



Vicinity Map 1 IN = 32 miles



APPENDIX A2 SSE-1391-K ODYSSEY TIMBER SALE WHALE PASS ADDITION SUBUNIT 5A



Appendix B References

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

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

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

Alaska Department of Natural Resources, Division of Forestry, Southern Southeast Area, Operational Forest Inventory for State and General Use Lands, Adopted February 9, 2016. Report retrievable from: <http://forestry.alaska.gov/timber/forestinventories>

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Catalog of Waters Important for Spawning, Rearing, or Migration of Anadromous Fishes- Southeastern Region, Alaska Department of Fish and Wildlife, Division of Sport Fish and Habitat, Effective June 1, 2010.

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

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

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

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

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

United States Forest Service Geographic Information System Database.

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

Appendix C Appeal and Request for Reconsideration Regulations

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

11 AAC 02 Regulations

11 AAC 02.010. Applicability and eligibility.

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

11 AAC 02.015. Combined decisions.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

11 AAC 02.040. Timely filing; issuance of decision.

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

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

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

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

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

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

11 AAC 02.050. Hearings.

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

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

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

(c) In a hearing held under this section

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

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

11 AAC 02.060. Stays; exceptions.

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

(b) Repealed 9/19/2001.

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

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

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

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

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

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

11 AAC 02.070. Waiver of procedural violations.

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

11 AAC 02.900. Definitions.

In this chapter,

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

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

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

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

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

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

Appendix D SSE-1391-K Odyssey Timber Sale Comments & Responses

Preliminary Best Interest Finding Odyssey Timber Sale (SSE-1391-K) Comments

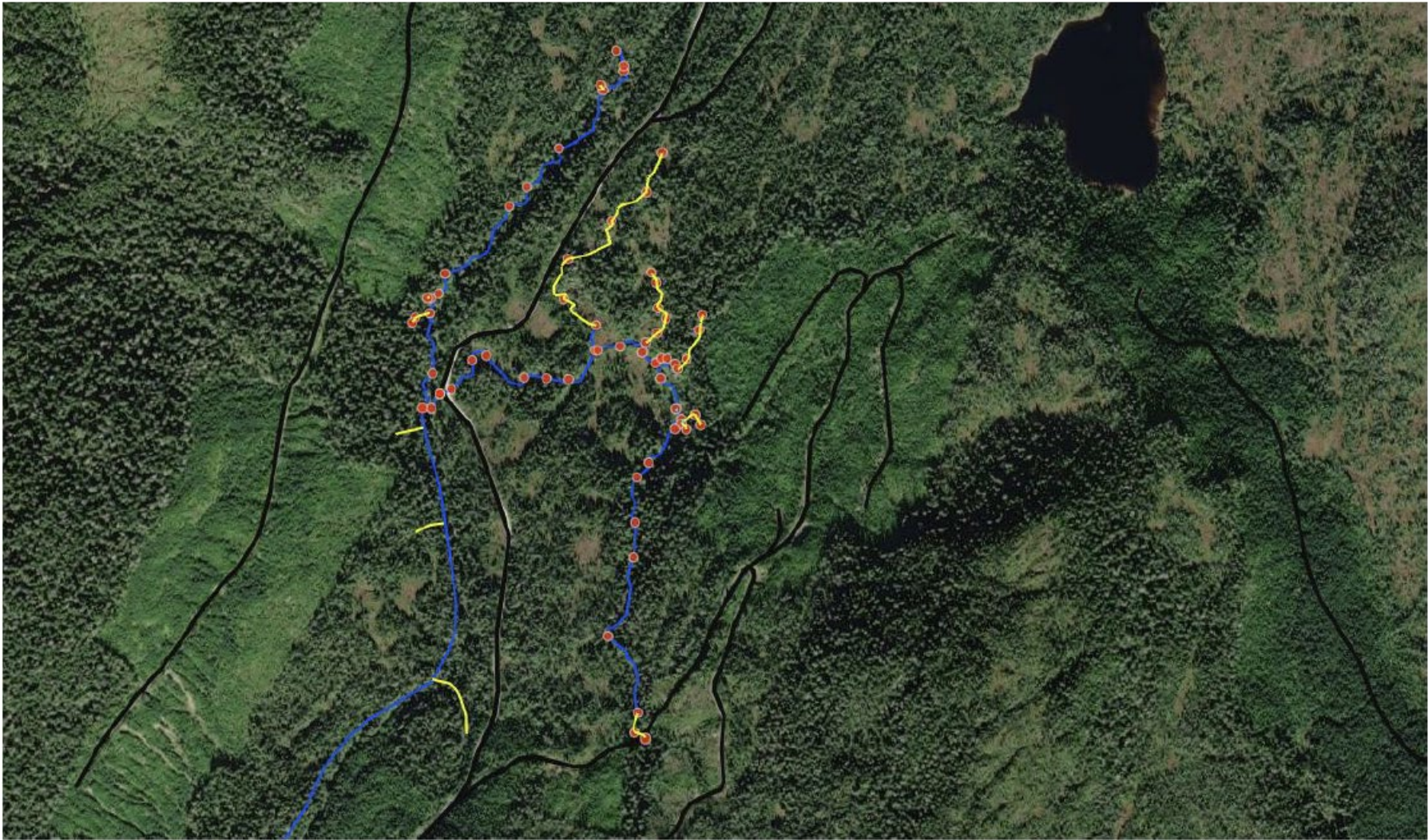
Department of Natural Resources, Division of Forestry & Fire Protection
February 2025

Commenter:
ADFG Division of Habitat

The following comments were received during the public comment period on the Preliminary Best Interest Finding for the Odyssey Timber Sale (SSE-1391-K):

Commenter	Comment	
	Fisheries	
<p>Mark Minnillo, Area Habitat Biologist, Alaska Department of Fish and Game (ADFG)</p>	<p><u>El Capitan</u> ADF&G reviewed the maps included with the PBIF, Atlas and Catalog of Anadromous Waters, and ADF&G Habitat GIS stream survey mapping database. Cataloged stream 105-42-10100- 2200 bisects the northern portion of the El Capitan North Subunit (see Map A). This stream is important for coho salmon. In addition, ADF&G conducted preliminary surveys of several tributaries of stream 105-42-10100-2200. One tributary, 105-42-10100-220-3015 was found to be important for coho salmon. Four other tributaries (yellow arcs on Map A) were identified as needing additional surveys as they may also be important for coho salmon. ADF&G staff can be available to conduct additional stream surveys in order to determine if any of the other tributaries are important for anadromous fish. Road access is currently unknown. Fish Habitat permit(s) may be necessary if access to the harvest area will require constructing roads which will cross fish-bearing streams.</p> <p><u>Exchange Cove</u> There is one stream (yellow arc toward center of Map B) located in the southern portion of the Exchange Cove Subunit designated as needing further investigation. Currently ADF&G has no specific information for this stream. Additional surveys are needed to determine if this stream is important for anadromous fish.</p> <p><u>Whale Pass</u> There are two streams located toward the southern portion of the Whale Pass Addition Subunit 5A (see Map C) that have been designated as needing further investigation. ADF&G personnel can be available to conduct a stream survey during the unit layout. It is unknown whether these streams are fish bearing or if the proposed harvest area would impact either of the streams.</p>	<p>The proposed timber sale maps have been updated to reflect the agency provided information. ADF&G will continue to be consulted in the development of the FLUP.</p>

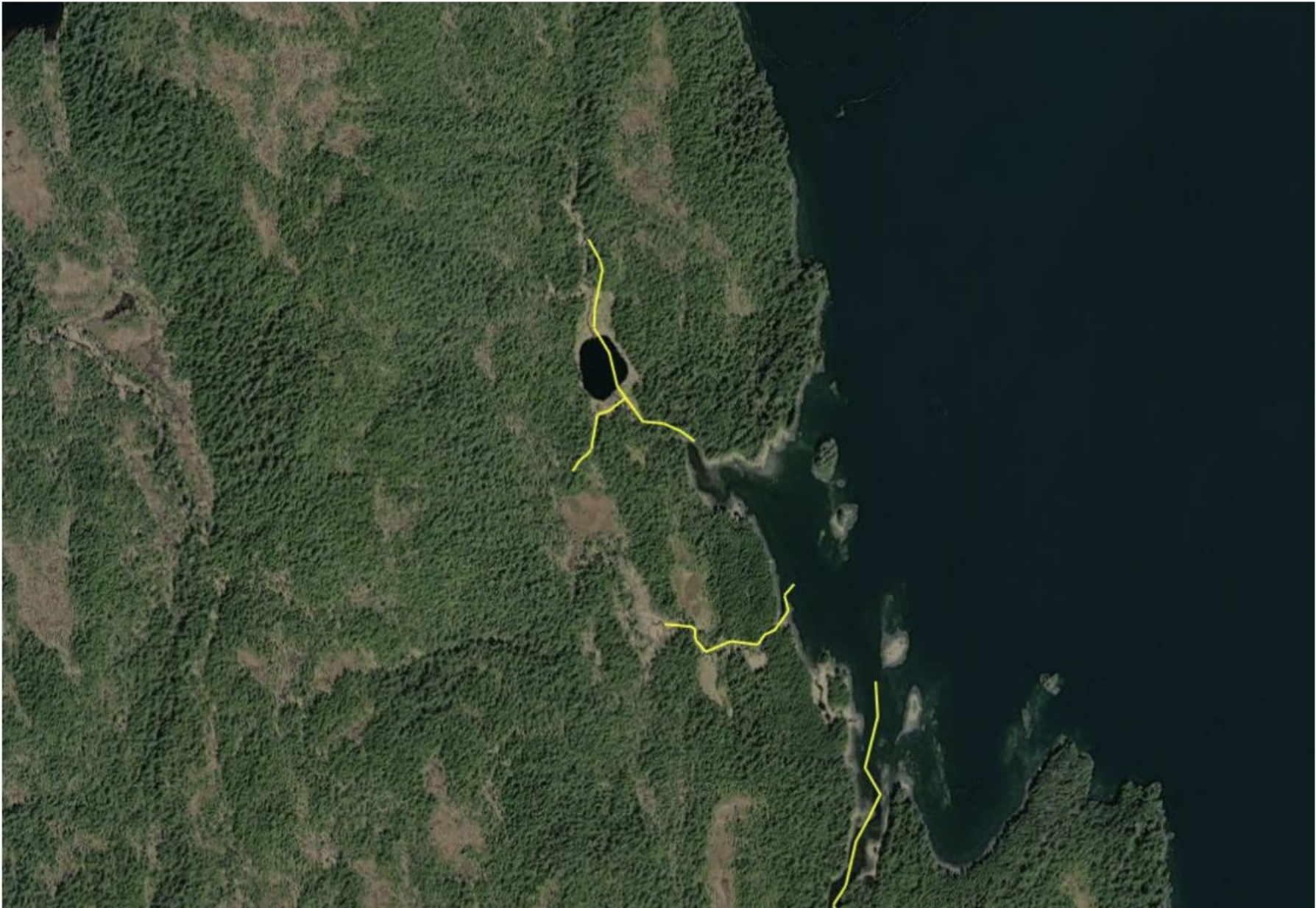
	Wildlife	
<p>Mark Minnillo, Area Habitat Biologist, Alaska Department of Fish and Game (ADFG)</p>	<p>ADF&G expects the overall impact of this timber sale on the Game Management Unit 2 (GMU2) deer population to be minimal. However, taken together with the other timber harvest that has occurred within GMU 2, the cumulative effects of timber harvest on deer populations may be significant. ADF&G recommends retaining all timber within 1000 feet of the shoreline to maintain important deer winter habitat.</p> <p>The proposed timber harvest units may impede deer movement 1) from high elevation summer range to important winter habitat at lower elevations or near the shoreline, and 2) between sections of high-quality deer habitat. Connectivity between habitat types is important to deer movements within and between seasons to fulfill physiological and nutritional requirements. DWC recommends no harvest in a 300-foot-wide corridor to facilitate deer movement at the following locations: 1) Exchange Cove Unit 1B, from 56.1995651° N, -133.0838703° E to 56.1992924° N, -133.0800933° E, running from the coast to the hillside; 2) El Capitan North Subunit, from 56.1841979° N, -133.2716571° E, to 56.1837424° N, -133.2693310° E, and from 56.1835996° N, -133.2686081° E to 56.1834114° N, -133.2647675° E, connecting patches of old-growth forest on the east and west sides of the timber sale unit. Additionally, DWC recommends retaining all old-growth forest stands within 1000 feet of the shoreline which primarily impacts the Exchange Cove and Whale Pass Subunits.</p>	<p>Leaving 1,000 FT of timber adjacent to the beach precludes multiple uses of the land in this management area and more specifically feasible timber sales. Constraining the timber harvest to that extent does not meet the objectives of the POWIAP or the timber sale. The DNR perspective additionally considers the very limited activity planned for the foreseeable future on adjacent federal land.</p> <p>To mitigate shoreside winter deer habitat loss concerns, the DOF intends to leave shore side timber within approximately 300 FT of the beach at El Capitan and Whale Pass and consider the topography observed controlling wildlife movement, the feasibility of the timber harvest and other pertinent factors such as wind firmness in developing the specific harvest boundaries. At Exchange Cove, timber will be left east of the road due to the importance of the estuarian habitat in the area. The scope of the shoreline retention area is in keeping with the intent of the POWIAP, the SESF Plan and ADF&G input on the subject.</p> <p>Additionally, the DOF will examine the feasibility of retaining 300 FT wide timbered corridors to provide cover at the coordinate locations indicated by ADF&G to facilitate travel between the indicated topography features by deer. The specifics will be addressed during the development of the FLUP.</p>
	<p>There are no known bear or wolf dens near the proposed timber sale units.</p>	<p>Noted, no change required.</p>
	<p>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.</p>	<p>Comment noted, no change required. The DOF discussed this issue with ADF&G. The implementation of FRPA best management practices for surface waters adequately mitigates this specific habitat concern.</p>
	<p>ADF&G recommends retaining snags for bat habitat and maternity roosts.</p>	<p>Comment noted, no change required. The DOF has been doing this for several years.</p>



Map A



Map B



Map C