

**MEMORANDUM**  
**DEPARTMENT OF NATURAL RESOURCES**

**State of Alaska**  
**DIVISION OF FORESTRY**  
**Southern Southeast Area Office**

**TO:** McKenzie Johnson, OHA  
Mark Minnillo, ADF&G  
Greg Albrecht, ADF&G  
Lee Cole, SER DMLW  
Cliff Baker, ADNR-Survey Section

**DATE:** April 17, 2018

**FILE NO:** 2018-2022 FYSTS

**PHONE:** 225-3070

**SUBJECT:** Final 2018-2022  
FYSTS & Comment Matrix

**FROM:** Greg Staunton  
Southeast Area Forester

Attached is the Final Five-Year Schedule of Timber Sales 2018 through 2022. This scoping document has been adopted. A matrix of comments and responses has been incorporated and the maps have been revised to reflect subject matter as applicable.

This document is not appealable.

**CC:**  
Owen Graham, Alaska Forest Association  
Larry Edwards, Alaska Rainforest Defenders  
Mark Jensen, City of Petersburg  
Ruben Duran, Ketchikan Gateway Borough  
Jonathan Kreiss-Tomkins, Legislature  
Mara Lutomski, Petersburg Chamber of Commerce  
Liz Cabrera, Petersburg Development Council



# **DIVISION OF FORESTRY SOUTHERN SOUTHEAST AREA**

**FIVE-YEAR SCHEDULE  
OF  
TIMBER SALES  
CALENDAR YEARS 2018 THROUGH 2022**

## Abbreviations

ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADF&G-DWC	Alaska Department of Fish and Game, Division of Wildlife Conservation
ADNR	Alaska Department of Natural Resources
AMHT	Alaska Mental Health Trust Authority
BIF	Best Interest Finding
DMLW	Division of Mining, Land and Water
DOF	Division of Forestry
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

## **Purpose of the Five-Year Schedule of Timber Sales**

This Five-Year Schedule of Timber Sales (FYSTS) provides information to State Agencies, commercial and noncommercial organizations, as well as the general public concerning planning and uses of forest resources on the Southeast State Forest (SESF) as well as other State lands found within the Southern Southeast Area for the period January 2018 – December 2022. This FYSTS meets the Alaska Statute (AS 38.05.113) requirements for periodic notification of planned activities, including timber sales, on the SESF as well as other State lands found within the Southern Southeast Area. The Southern Southeast Area encompasses lands from Tracy Arm/Frederick Sound south to Dixon Entrance and Portland Canal.

This FYSTS illustrates decisions made by the Division of Forestry (DOF) with regard to the development of forest resources on the SESF and on other State lands found within the Southern Southeast Area.

This document does not represent harvest activities or harvest levels proposed by the University of Alaska (UA) or the Alaska Mental Health Trust Authority (AMHT). Their respective land offices manage the UA and AMHT lands.

Salvage sales, emergency sales, sales of 160 acres or less, negotiated sales less than 500 thousand board feet (MBF), and personal use permits are exempt from the FYSTS requirements. All other timber sales must be included in one of the two five-year schedules preceding the sale (AS 38.05.113(b)). To give the public a responsible representation of Department of Natural Resources (DNR) activities, the five-year schedule will also include, whenever practical:

1. All sales less than 160 acres that require a Forest Land Use Plan (FLUP).
2. Salvage sales and areas of contiguous small sale activity on at least one FYSTS preceding the sale unless waiting on the schedule will:
  - a. cause substantial losses of economic value on salvage sales under AS 38.05.117, or,
  - b. for sales less than 160 acres, preclude a local economic enterprise or forest management project that is in the State's best interest.

The Southern Southeast Area Office of the DOF bases the FYST Sales on lands that are available for timber harvest within the SESF, and on lands identified in the Prince of Wales Island Area Plan, the Prince of Wales Island Area Plan Amendment and the Central/Southern Southeast Area Plan as being available for timber harvest. The Department of Natural Resources (DNR), Division of Mining, Land and Water (DMLW) develops area plans to designate appropriate uses for state land, classify the land accordingly, and establish guidelines for their use based on the multiple use principal. These plans determine where timber harvest is an allowed use and what other uses must be considered when designing and implementing sales. Subsequent land use decisions must be consistent with the area plans.

The areas targeted for timber harvest and development are quantified in this FYSTS based on aerial

photo inventory. This is augmented by limited ground reconnaissance and historical knowledge accumulated by personnel working in the area. To meet the State mandate of sustained yield according to AS 38.04.910, the DOF has taken a conservative approach to developing the annual allowable cut. The DOF manages the annual allowable cut on a decadal basis and will not exceed its allowable annual cut as averaged on a ten-year basis.

All State timber sales must comply with the Alaska Forest Resources and Practices Act and Regulations (FRPA); and the Alaska Land Act and Regulations. Currently, all State timber sales must adhere to area wide land management policies for their respective management unit (Chapters 2 & 3) of the Prince of Wales Island Area Plan, the Prince of Wales Island Area Plan Amendment, or the Central/Southern Southeast Area Plan or the Southeast State Forest Management Plan for lands found within the SESF.

All commercial timber sales that exceed 500 MBF will have a Best Interest Finding (BIF). Additionally, a BIF will be completed on any timber sale that is a negotiated under AS 38.05.118 or AS 38.05.123 and is under 500 MBF in size. A BIF is the decision document that:

- 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 that 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 sale price

The BIF will go through a preliminary decision prior to adoption. This preliminary decision will have both public and agency review and the DOF will review comments, make changes as appropriate to this preliminary decision prior to adoption of the BIF. The adopted BIF may be appealed in accordance with 11 AAC 02 by any person affected by the decision that provided timely written comment or public hearing testimony on the preliminary decision.

The Division of Forestry may negotiate small timber sales under 500 MBF (AS 38.05.115) without a BIF while complying with regulations for these small sales as established in 11 AAC 71.045. Small mill operators have expressed an interest in such sales because they fit their mill capacity needs and are within their economic range. The Southern Southeast Area DOF will layout small sales as ground conditions and sale economics allow. The Division of Forestry will strive to accommodate supply needs for as many operational small mills as possible while staying within our workforce and budget constraints.

Prior to authorizing harvest of timber on any area greater than 10 acres, the DOF must adopt a site-specific Forest Land Use Plan (FLUP) for the harvest area. The DOF will prepare FLUPs for

harvest areas within the overall sale area covered by the BIF. FLUPs specify the site, size, timing and harvest methods for harvest unit(s) within the sale area. FLUPs also address site-specific requirements for access construction and maintenance, reforestation and multiple use management. FLUP's will be based on additional fieldwork, agency and community consultation, and site-specific analysis by the DOF, and will be subject to public and agency review.

Following adoption of the BIF and the FLUP, the DOF will offer the timber sale by competitive means (AS 38.05.120) or negotiating sales (AS. 38.05.118 and AS 38.05.123) with purchasers. Timber sale contracts will include stipulations to ensure compliance with the BIF, FLUP, FRPA and other statutory requirements.

Subsequent to contracting these timber sales, the DOF will administrate the sales and conduct field inspections to ensure compliance with BIF, FLUP, timber sale contract and applicable laws including the FRPA.

### **Timber Sale Land Base**

The State land base in Southern Southeast Alaska includes the major islands of Mitkof, Kupreanof, Kuiu, Wrangell, Prince of Wales and Revillagigedo, and the surrounding smaller islands south of Fredrick Sound. In addition, the land base includes the mainland from Tracy Arm to Hyder. The Division of Forestry operates its timber sale program on two types of land classification in southern southeast Alaska; General Use (GU) lands and SESF lands. The General Use land has been designated in the Areas Plans as being appropriate for timber harvest along with other multiple use activities. GU lands within their respective Area Plans may have harvest restrictions on a site-specific basis. These restrictions can be found within the Area Plans. The Area Plans designate several different uses of land in addition to GU such as Habitat, Settlement, Recreation and Water Resource Lands.

Outside the Division of Forestry's timber sale program, the division manages timber resources on State Lands not designated as GU lands or within the SESF. The Division of Forestry in this case is only the timber manager and the land is managed by its respective managing State agency. These lands are not considered a part of the timber sale land base nor is the volume harvested considered in the annual allowable cut. Timber harvest on lands designated as Settlement is considered appropriate, "if intended to support the costs or design of subdivision activity". (POWIAP, pg. 2-22) Over the next five-year period, the DOF anticipates working with DMLW to facilitate the development of roaded subdivisions in southern southeast.

In 2010 and 2011, the Legislature established the SESF. The State's third and newest forest includes 48,472 acres of land located in southern southeast Alaska that originally was GU designated lands. Many of the Forest's 33 parcels are on Prince of Wales Island. Other parcels are located on Gravina, Heceta, Kosciusko, Revillagigedo, and Tuxekan islands. The remaining parcels are located on the mainland.

By reserving the land ownership and designating it as State Forest lands, the Legislature defined the management intent of the parcels. While GU classified land allows for timber harvesting and

other forestry activities, the State Forest designation focuses the long-term use of the land to providing timber and other forest resources. The primary purpose of SESF “is timber management that provides for production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources.” (AS 41.17.200) The Division of Forestry has and will invest in an active manner to achieve the use of these forest resources. Examples of this investment include construction of roads and other infrastructure; and forest management actions such as pre-commercial thinning to improve tree growth and wildlife habitat.

The dominant public landowner in the area is the United States Forest Service (USFS). The dominant private landowners are native village corporations including Shaan-Seet Corporation, Kootznook Corporation, Klukwan, Klawock-Heenya Corporation, Kavilco, Kake Tribal Corporation, Haida Corporation, and Cape Fox Corporation. The regional native corporation is Sealaska Corporation.

### **Management Intent of the DOF Timber Sale Program**

The Division of Forestry’s management intent for Southern Southeast Area is to provide raw material for the local timber industry while maintaining the sustained yield of renewable resources. The intent of the timber sale program is to help support the wood product businesses in Alaska’s southeastern communities. At the present time, most negotiated State timber sales in Southern Southeast Alaska require primary manufacture in the State, with emphasis on producing value-added and high value-added products. The percentage of required in-state manufacturing varies by timber sale. Resource protection, road construction costs, transportation costs, sale location, sale size, timber species and the world economy are all influences that affect the ability of a timber sale purchaser to process timber locally. The State will pursue processing as much of the timber locally as possible while maintaining a focus on delivering economically operable timber sales to local manufactories.

It is the Division of Forestry’s intent to offer the annual allowable cut for southern southeast on a yearly basis while complying with the FRPA and Regulations; the Alaska Land Act and Regulations, management guidelines from Area Plans and the SESF Management Plan. State timber sales will be targeted to offer opportunity to as many local processors as possible. The Division of Forestry also offers timber for sale by competitive bid under AS 38.05.120 to the highest qualified bidder. Timber volume sold under this authority is available for round log export.

## **Timber Harvest Methodology**

The majority of the timber harvest in the Southern Southeast Area will be by the clear-cut method. The Division feels that clear cutting is an effective and safe silviculture tool to use, given the patchwork of varying land uses allowed on State land by the existing Area Plans.

Where economically practical with respect to a perceived need for specific species or type of timber, a selective harvest will be considered and designed.

The Division of Forestry is required to manage its' timber harvest on a sustained yield basis (AS 38.05.065(b) (1)). "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. Based on proposed sales and 2007-2017 harvest data, sales through 2017 were within the "sustained yield" management objective. When the total annual volumes listed in this FYSTS exceed the allowable cut on a yearly basis; it is done for planning purposes and to allow leeway within the DOF's timber sales program to react to unknown project constraints and market fluctuations.

The annual allowable cut calculation is determined by using the area regulation method, a method that best utilizes existing forest stand information. The area regulation method involves determining the net-forested acres available for harvest and dividing that number by the rotation period. The rotation period is the time it takes to grow a commercial stand of trees. A 100-year rotation has been the established standard for Southeast and is currently being used by the Division of Forestry. This rotation age could be adjusted in the future as more information on growth patterns of even-aged timber stands become available. Initial studies indicate that a rotation age as low as 60 to 80 years may be feasible on managed lands in Southern Southeast Alaska.

The Area Plans and the SESF Management Plan are the governing source for gross available acreage. The Division of Forestry has estimated that within the area plans there is estimated 24,956 acres on GU lands that can be considered for timber harvest. The SESF has an estimated 48,472 acres that can be considered for timber harvest. As a result of this a gross total of 73,428 acres can be considered for timber harvest. The gross total acreage is further refined through reductions in acreage for such things as vegetative cover that is capable of growing commercial timber, known resident high value and anadromous stream retention areas, exclusion zones listed in the area plans, and coastal buffers. This further refinement of acreage is called the operable timber base (OTB) and as a result of these refinements the DOF estimates the OTB to be 46,673 acres. The Division will continue to adjust and refine the OTB acreage based on fieldwork dependent upon staff availability and travel funds. When the total OTB acreage (46,673 acres) is divided by the 100-year rotation period, an annual allowable cut of 467 acres is derived. Based on DOF experience with the land and the best forest stand information, an average volume of 26 MBF per acre was applied yielding an allowable cut of 12,135 MBF per year.



## **Narrative Summary of Five-Year Schedule Activities**

This schedule includes sale area maps for all potential sales over 10 acres in size for CY 2018- CY 2022. Due to a variety of reasons, including budget constraints, lack of personnel, sale program direction and market uncertainties, most of the sales in the last three years of this schedule are conceptual at this time. Photo layout and ground reconnaissance will begin as time and budgets allow.

Annual harvest volumes for this Five-Year Schedule of Timber Sales are higher than the annual allowable cut on a yearly basis. This is done for planning purposes to allow leeway in DOF timber sales programs to adjust to unknown project constraints or market fluctuations. Under no condition will the annual allowable cut be exceeded over a ten-year period.

Right-of-way sales, blowdown sales and sales less than ten acres in size are not generally located on the maps for this FYSTS. Small sales will be located throughout Southern Southeast Alaska. Several small sales totaling in volume of approximately 2,000 MBF in timber will be offered for each calendar year to the extent accessible timber and market allow.

## 2018 Calendar Year

### Bostwick Area

OLD GROWTH ACRES: 580      YOUNG GROWTH ACRES: 0      ROAD MILES: 3.0

Within this area is an estimated volume of approximately 8,000 MBF on 570 acres. The Bostwick area is situated on Gravina Island southwest of the Ketchikan International Airport. Part of this area consists of the reoffer of 38 acres of the Bostwick #1 timber sale which was not completed under the original contract in 2007. In order to access the area, 3.0 miles of road will be constructed with the need to cross the east fork of Bostwick Creek. The DOF will work with the ADF&G, Habitat Division for bridge placement across Bostwick Creek. The sale area may involve the use of conventional and helicopter harvest methods. The entire proposed operation at Bostwick is within the SESF.

### North Hollis Area

OLD GROWTH ACRES: 230      YOUNG GROWTH ACRES: 0      ROAD MILES: 3.3

This 5,000 MBF timber sale is located on Prince of Wales Island to the north of the community of Hollis. The area encompasses 230 acres and is currently under contract with active operations. The harvest is on lands designated as General Use in the POW Island Area Plan.

### North Thorne Bay Area

OLD GROWTH ACRES: 300      YOUNG GROWTH ACRES: 0      ROAD MILES: 3.5

Located northeast of the City of Thorne Bay on Prince of Wales Island, this sale area consists of three timber stands within the SESF. The larger of the three stands is south of the harvested North Thorne Bay #3 timber sale and its road access is an extension of the existing state forest road system; an estimated 4,000 MBF is proposed to be harvested within this stand. The other two stands are in the northern part of the tract and contain an estimated 1,800 MBF. The DMLW has also proposed to harvest south of the SESF on lands designated as Settlement in Sections 21, 26, 27, and 34 and 35 in coordination with future subdivision actions.

### Vallenar Area

OLD GROWTH ACRES: 300      YOUNG GROWTH ACRES: 300

Vallenar Bay is located on Gravina Island near Ketchikan, Alaska. The volume to be offered totals approximately 12,000 MBF; all on SESF land. Access was created by the DOF in 2017 to the area by construction of a forest road from the Lewis Reef area to the existing logging road on the southeast side of Vallenar Bay. Depending on market conditions, the DOF would sell the timber as one or several sales. Due to the isolated nature of parts of the area, the sale may involve the use of conventional and helicopter harvest methods.

## 2019 Calendar Year

### Heceta Area

OLD GROWTH ACRES: 145      YOUNG GROWTH ACRES: 80      ROAD MILES: 2.5

Based on field layout an estimated 5,000 MBF of timber will be made available on Heceta Island in two units, Heceta East and Heceta West. Harvest with this operation will be on lands in the SESF and lands designated as General Use. The units have a mix of young growth and residual old growth. The SHPO has visited the area and their recommendations have been incorporated into the sale design. The ADF&G has conducted stream inspections to verify extent of anadromous habitat. Coordination with the DMLW will take place during the FLUP planning process to ensure that requirements of Chapter 3, Subunit 10a of the Prince of Wales Island Area Plan are met.

### Kosciusko Island Area

OLD GROWTH ACRES: 220      YOUNG GROWTH ACRES: 500      ROAD MILES: 5.0

Based on reconnaissance on 720 acres, an estimated 14,000 MBF of timber may be made available within the Kosciusko area. This area may be sold in one or more sales over several years. All the proposed operations are within the SESF.

## 2020 Calendar Year

### El Capitan Passage Area

OLD GROWTH ACRES: 1,700      YOUNG GROWTH ACRES: 0      ROAD MILES: 5.0

The El Capitan area is located on the north end of Prince of Wales Island. An estimated 17,000 MBF of old growth timber has been identified on 1,700 acres. Approximately 5.0 miles of new road may be required. Proposed harvest is primarily on SESF lands. The extent of anadromous habitat will be determined in cooperation with ADF&G during the development of the BIF and FLUP.

### Whale Pass Area

OLD GROWTH ACRES: 441      YOUNG GROWTH ACRES: 0      ROAD MILES: 1.0

This potential harvest area is adjacent to the community of Whale Pass on Prince of Wales Island. This area is expected to produce 6,600 MBF on 440 acres and may require approximately 2.0 miles of road construction. The sale area may involve the use of both conventional and helicopter harvest methods. As conceptually drawn, 390 acres of this operation are on the SESF and 51 acres are on land designated as General Use. The DMLW is currently considering a subdivision within the vicinity of Whale Pass which may be incorporated into the sale design. The harvest within the Settlement lands may only occur in coordination with the DMLW and if the requirements of Chapter 2 of the Prince of Wales Island Area Plan are met. The SHPO has previously requested to survey the timber sale area as part of the planning process.

## 2021 Calendar Year

### Control Lake Area

OLD GROWTH ACRES: 170      YOUNG GROWTH ACRES: 0

Located on Prince of Wales Island near Control Lake and the junction of Highways 925 and 929, this area consists of eight harvest areas which may be sold in either one or multiple sales. The harvest area totals approximately 170 acres containing an estimated 3,400 MBF of timber. Harvest operations may require the construction of 1.4 miles of road for access. Approximately half of the harvest area is within the SESF, the other is on lands designated as General Use.

### Naukati Area

OLD GROWTH ACRES: 162      YOUNG GROWTH ACRES: 0

Located on Prince of Wales Island near the community of Naukati, this area consists of three harvest areas which may be sold in one or more sales. The harvest areas contain an estimated 3,700 MBF of timber and will likely need the construction of short spur roads into each unit. Of the 162 acres, 103 acres are within the SESF, 59 acres are on lands designated as General Use. DMLW is currently considering a subdivision within the vicinity of Kaikli Cove and Little Naukati Bay. Harvest activities may occur relating to this development. The harvest within the Settlement lands may only occur in coordination with the DMLW and if the requirements of Chapter 2 of the Prince of Wales Island Area Plan are met. The extent of anadromous habitat will be determined in cooperation with ADF&G during the development of the BIF and FLUP.

### Port Dolores Area

OLD GROWTH ACRES: 1,020      YOUNG GROWTH ACRES: 89      Road: 5.0

Located on the north coast of Suemez Island off the west coast of Prince of Wales Island, this harvest area is dependent on crossing USFS land with 1,500 feet of road. Timber would most likely be trucked to Port Refugio for transfer to barge or raft. An estimated 12,200 MBF of old growth and an estimated 3,800 MBF of second growth could be harvested within this sale area. Of the 1,110 acres, 93 acres are found on lands designated as General Use, the balance is located on SESF land. The extent of anadromous habitat will be determined in cooperation with ADF&G during the development of the BIF and FLUP. The SHPO has previously requested to survey the timber sale area as needed during the sale design.

## 2022 Calendar Year

### Earl West Cove Area

OLD GROWTH ACRES: 700      YOUNG GROWTH ACRES: 0      Road 5.0 miles

Earl West Cove is located on the east shore of Wrangell Island. An estimated total volume of 12,500 MBF is proposed for harvest on approximately 700 acres on SESF land. The ADF&G has conducted stream inspections to verify extent of anadromous habitat.

### Kitkun Bay Area

OLD GROWTH ACRES: 1,051      YOUNG GROWTH ACRES: 0

Kitkun Bay is located within Cholmondeley Sound on the southeast side of Prince of Wales Island. This harvest area potentially covers an area of approximately 1,050 acres. The DOF proposes clear-cut harvest on the east side of the bay and selective harvest on the west side. The majority of the selectively harvested wood would be flown to barges located on the north shore of Kitkun Bay. Of the 1,051 acres, 233 acres are within the SESF and the balance is on General Use lands. Approximately 17,700 MBF is estimated to be in the sale area. The extent of anadromous habitat will be determined in cooperation with ADF&G during the development of the BIF and FLUP. The SHPO has previously requested to survey the timber sale area as part of the planning process.

### George Inlet Area

OLD GROWTH ACRES: 316      YOUNG GROWTH ACRES: 0

George Inlet is located on Revillagigedo Island. Development of this timber sale is dependent on the Alaska Department of Transportation and Public Facilities completing the Shelter Cove Road between the Leask Lake area and the Shelter Cove area. The proposed sale area consists of 316 acres containing an estimated 6,300 MBF of timber. The construction of an estimated 1.8 miles of spur road may be necessary to access the stands within the area. The SESF contains 103 acres of this proposed operation and 213 acres are on land designated as General Use. The DMLW is also considering a subdivision within the vicinity of Leask Cove and harvest activities may support this activity. The harvest within the Settlement lands may only occur in coordination with the DMLW and if the requirements of Chapter 2 of the Central/Southern Southeast Area Plan are met. The extent of anadromous habitat may be determined in cooperation with ADF&G during the development of the BIF and FLUP. The SHPO has previously requested to survey the timber sale area as part of the planning process.

### Little Coal Bay Area

OLD GROWTH ACRES: 1000      YOUNG GROWTH ACRES: 0

The Little Coal Bay Area is adjacent to Kasaan Bay, west of Baker Point. The proposed operation at Little Coal Bay is on lands designated as General Use. The DMLW is currently considering a subdivision within the vicinity of Little Coal Bay and harvest activities may occur relating to this development. The harvest within the Settlement lands may only occur in coordination with the DMLW and if the requirements of Chapter 2 of the Prince of Wales Island Area Plan are met. This area is approximately 1,000 acres in size with an estimated volume of 5,200 MBF. This area is proposed to be harvested with conventional shovel logging systems using clear-cut and possibly selective harvest using a helicopter. The extent of anadromous habitat will be determined in cooperation with ADF&G during the development of the BIF and FLUP. The SHPO has previously requested to survey the timber sale area as part of the planning process.

### Mitkof Island Area

OLD GROWTH ACRES: 210      YOUNG GROWTH ACRES: 0

Located on Mitkof Island, southeast of the City of Petersburg on SESF land. Approximately 4,000 MBF of timber is proposed for harvesting in one to four sales. Areas adjacent to this sale have been selected by the Borough of Petersburg for municipal entitlement land. The DOF will work with the Borough of Petersburg during the planning process for these sales.

### Thomas Bay Area

OLD GROWTH ACRES: 183      YOUNG GROWTH ACRES: 1530

The sale area is located at Thomas Bay northeast of Petersburg, Alaska and is comprised of both old growth and second growth stands. The total estimated volume that could be harvested is 20,200 MBF on 1,713 acres, of which 4,900 MBF is old growth and 15,300 MBF is second growth. Preliminary planning indicates 3.7 miles of road would require reconstruction and approximately 1.7 miles of new road would need to be constructed. All harvesting would be on lands designated as General Use and subject to the requirements of the Central/Southern Southeast Area Plan. Most of the area occupied by this proposed sale has been selected by the Borough of Petersburg for municipal entitlement land. The DOF will defer planning and action on the sale until the municipal conveyance process has reached a more definitive stage. The extent of anadromous habitat will be determined in cooperation with ADF&G during the development of the BIF and FLUP.

Table 1:

Southern Southeast Alaska  
Five-Year Schedule of Timber Harvests  
CY 2018-2022

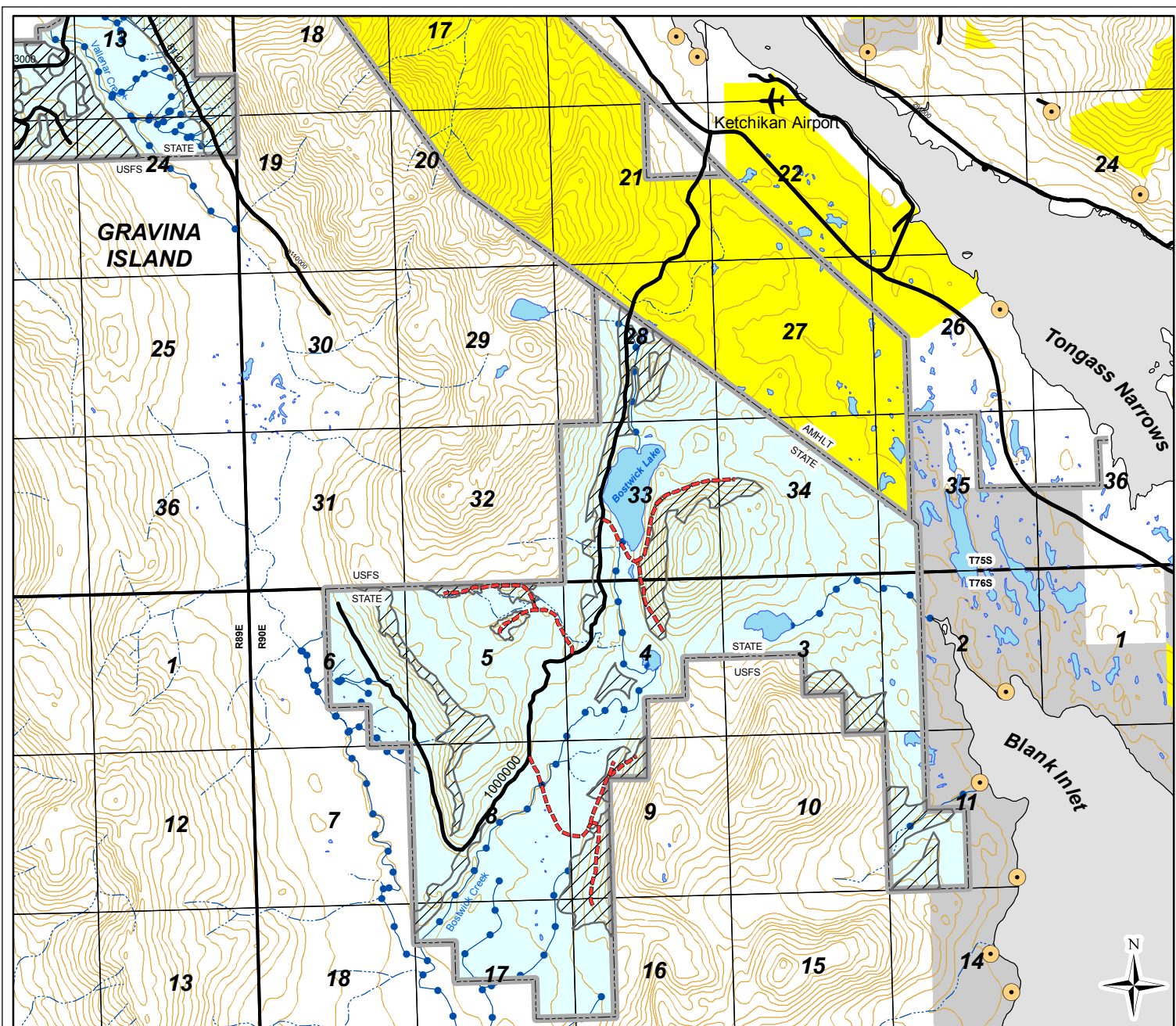
<u>Calendar Year</u>	<u>Timber Sale Name</u>	<u>Estimated Volume (MBF)</u>
2018	Bostwick Area	8,000
	North Hollis Area	5,000
	North Thorne Bay Area	5,800
	Vallenar Area	13,000
	Small Sales	<u>2,000</u>
	Subtotal	33,800
2019	Heceta Area	5,000
	Kosciusko Island Area	14,000
	Small Sales	<u>2,000</u>
	Subtotal	21,000
2020	El Capitan Area	17,000
	Whale Pass Area	6,600
	Small Sales	<u>2,000</u>
	Subtotal	25,600
2021	Control Lake Area	3,400
	Naukati Area	3,700
	Port Delores Area	16,000
	Small Sales	<u>2,000</u>
	Subtotal	25,100
2022	Earl West Area	12,500
	George Inlet Area	6,300
	Kitkun Bay Area	17,700
	Little Coal Bay Area	5,200
	Mitkof Island Area	4,000
	Thomas Bay Area	20,200
	Small Sales	<u>2,000</u>
	Subtotal	67,900



Table 2:

Southern Southeast Alaska  
Five-Year Schedule of Timber Sales  
List of Supporting Maps

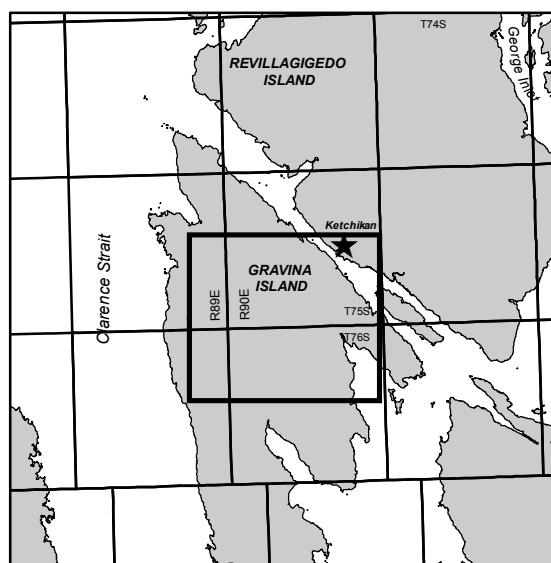
Bostwick Area  
Control Lake Area  
Earl West Area  
El Capitan Passage Area  
George Inlet Area  
Heceta Island Area  
Kitkun Bay Area  
Kosciusko Island Area  
Little Coal Bay Area  
Mitkof Island Area  
Naukati Area  
North Hollis Area  
North Thorne Bay Area  
Port Delores Area  
Thomas Bay Area  
Vallenar Bay Area  
Whale Pass Area



0 2,000 4,000 6,000 8,000 10,000  
Feet

1 inch = 5,000 feet

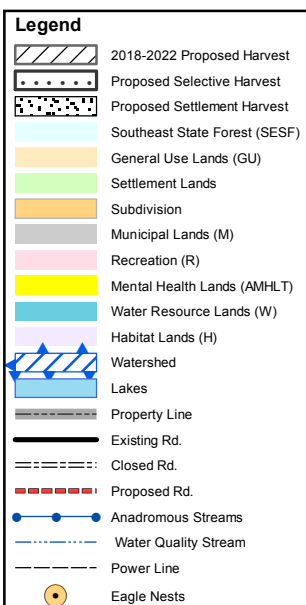
Contour Interval = 100 Feet



1 in = 7.4 miles

**Vicinity Map**

(C.R.M.)



# BOSTWICK AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022

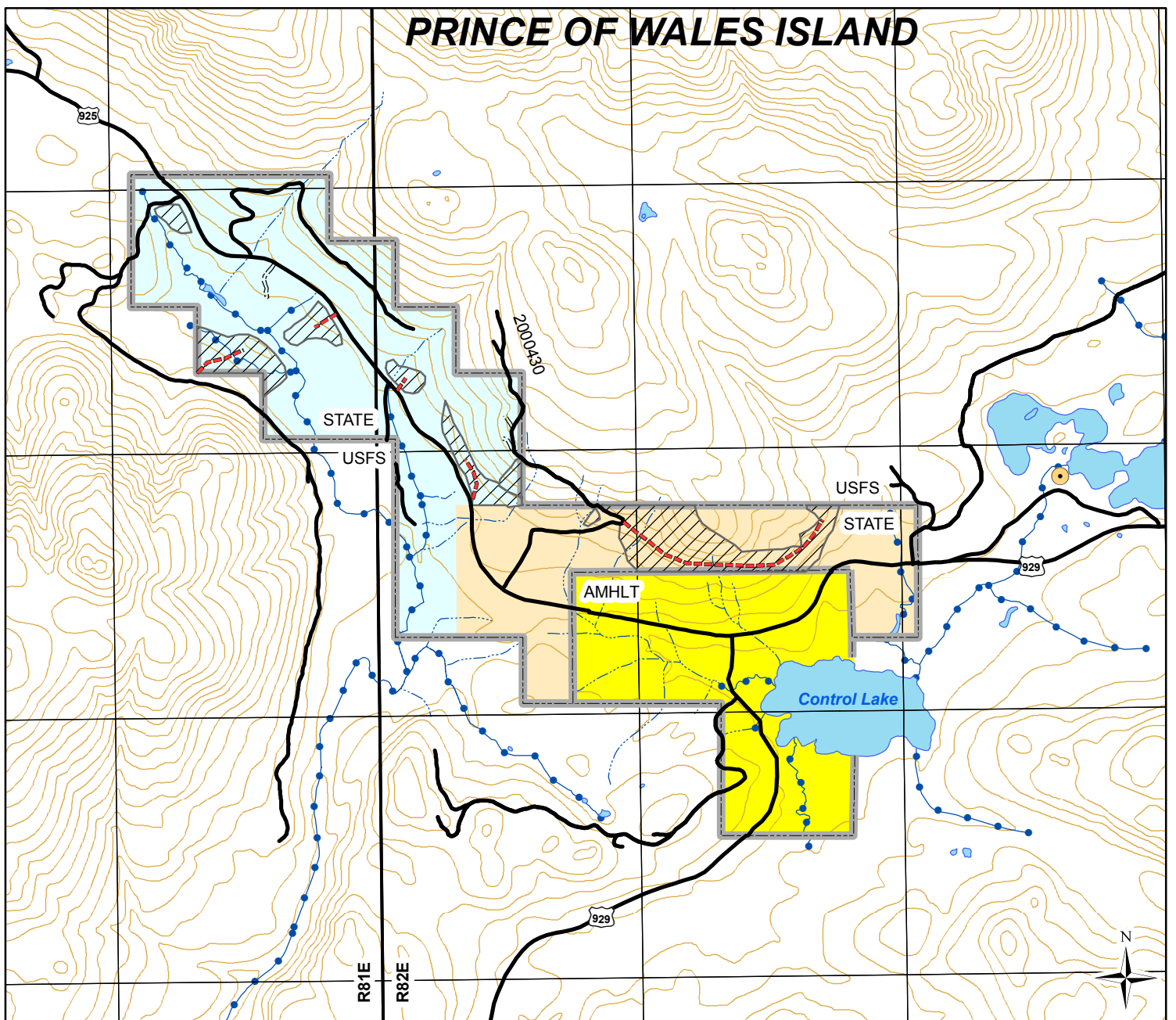


**DIVISION OF FORESTRY**

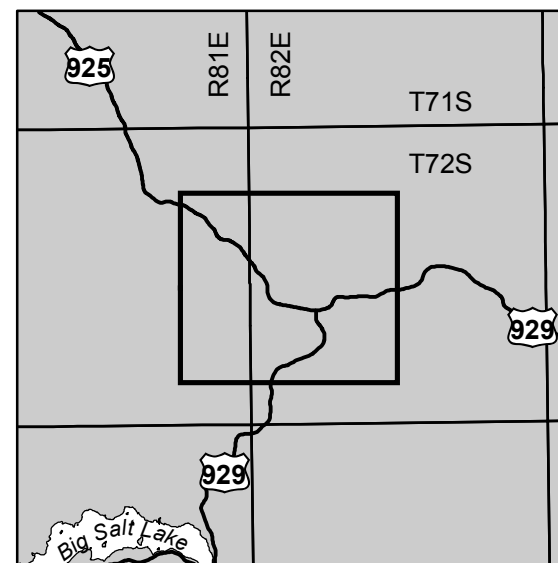
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JT

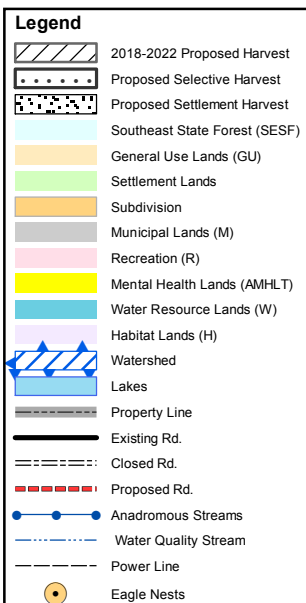
# PRINCE OF WALES ISLAND



0 2,000 4,000 6,000 8,000 10,000 Feet 1 inch = 3,000 feet Contour Interval = 100 Feet



1 in = 3.9 miles Vicinity Map (C.R.M.)



## CONTROL LAKE AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022

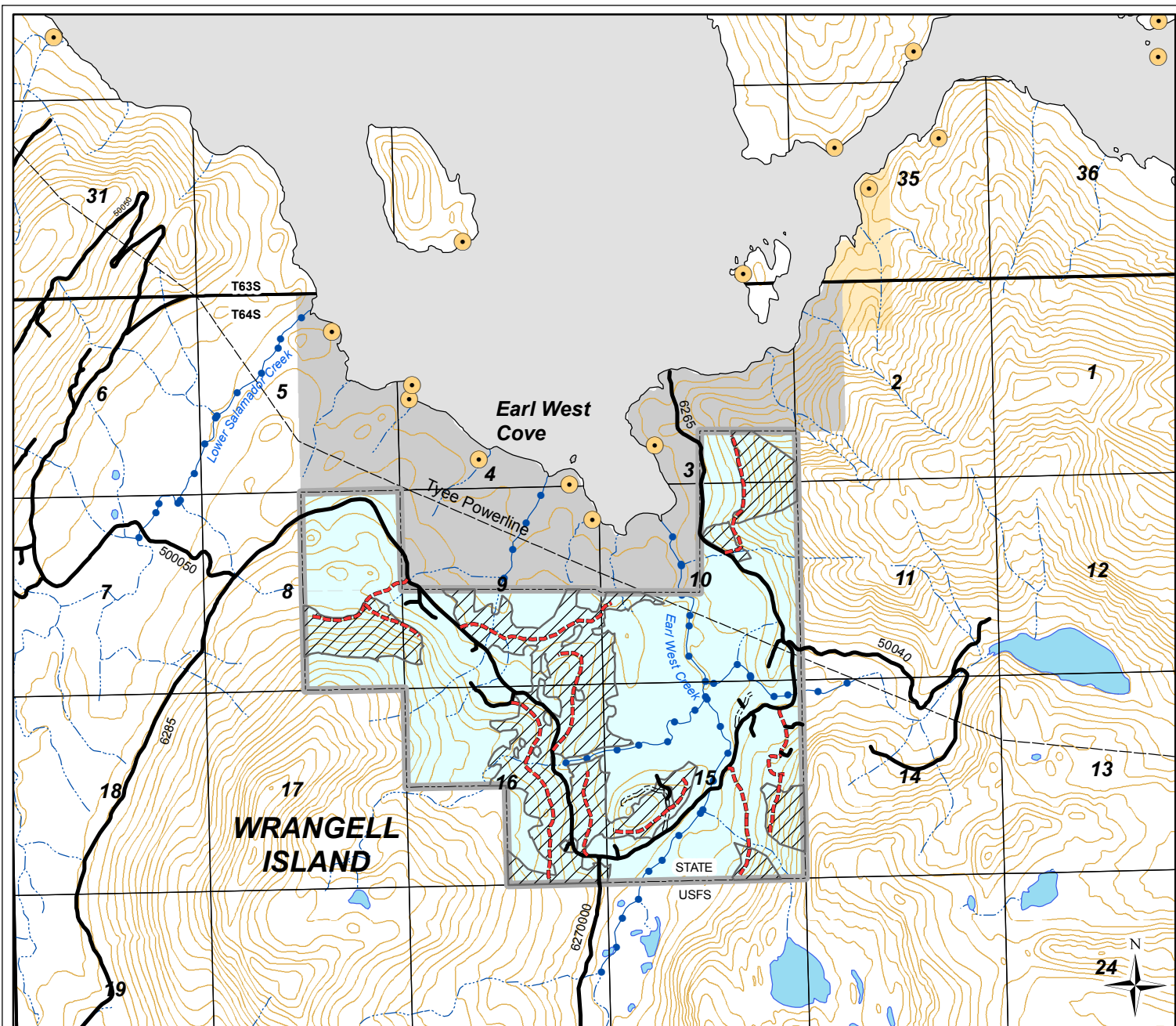


DIVISION OF FORESTRY

Date: 4/17/2018

JT

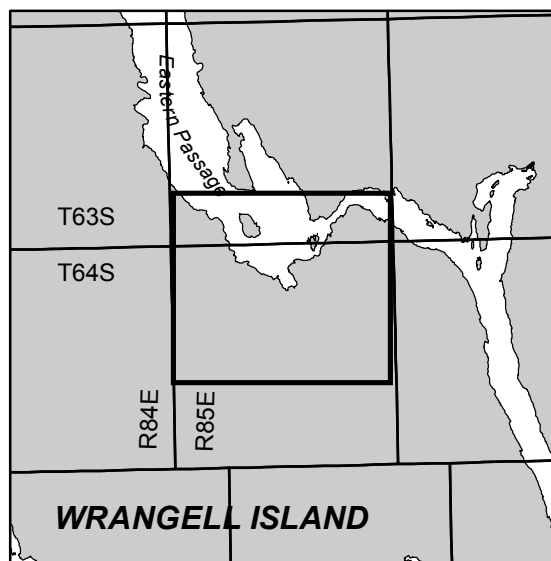




0 2,000 4,000 6,000 8,000 10,000 Feet

1 inch = 4,000 feet

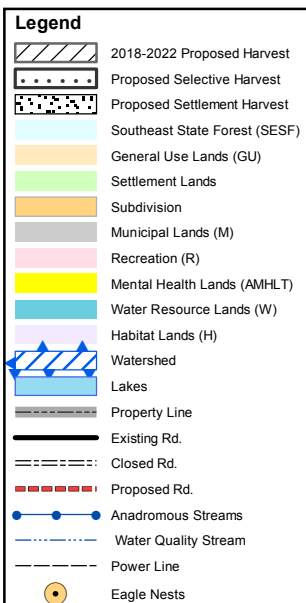
Contour Interval = 100 Feet



1 in = 5.2 miles

Vicinity Map

(C.R.M.)



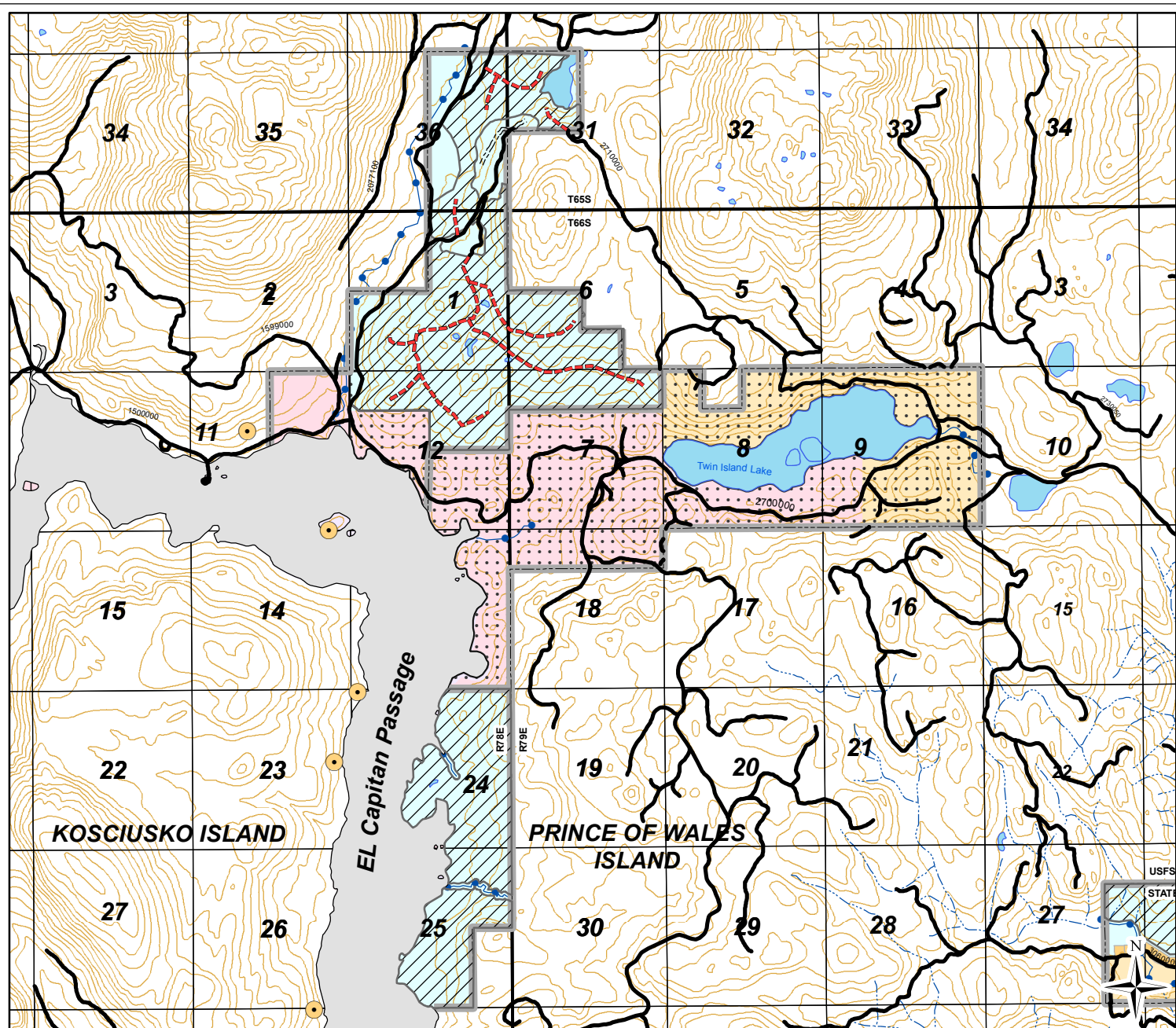
# EARL WEST AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022



DIVISION OF FORESTRY

Date: 4/17/2018

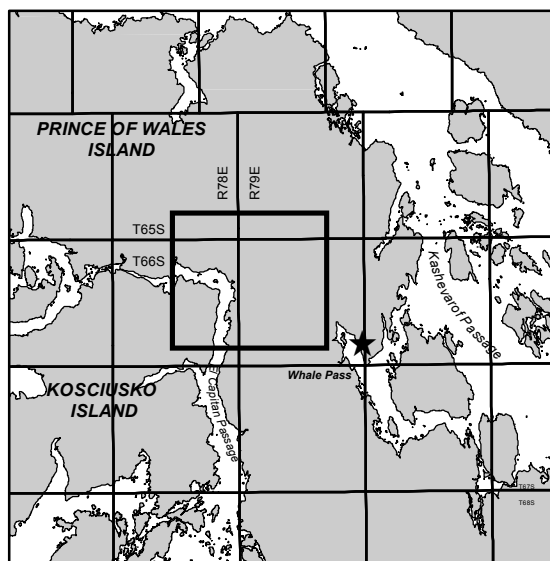
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Feet

1 inch = 5,000 feet

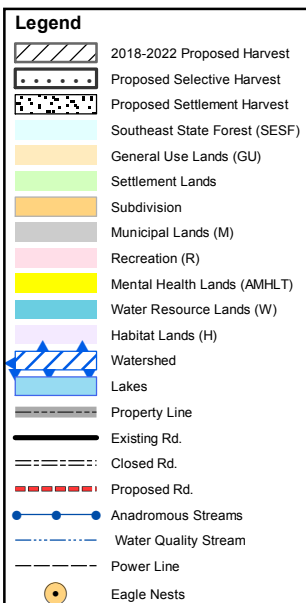
Contour Interval = 100 Feet



1 in = 9.1 miles

**Vicinity Map**

(C.R.M.)



## EL CAPITAN PASSAGE AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022

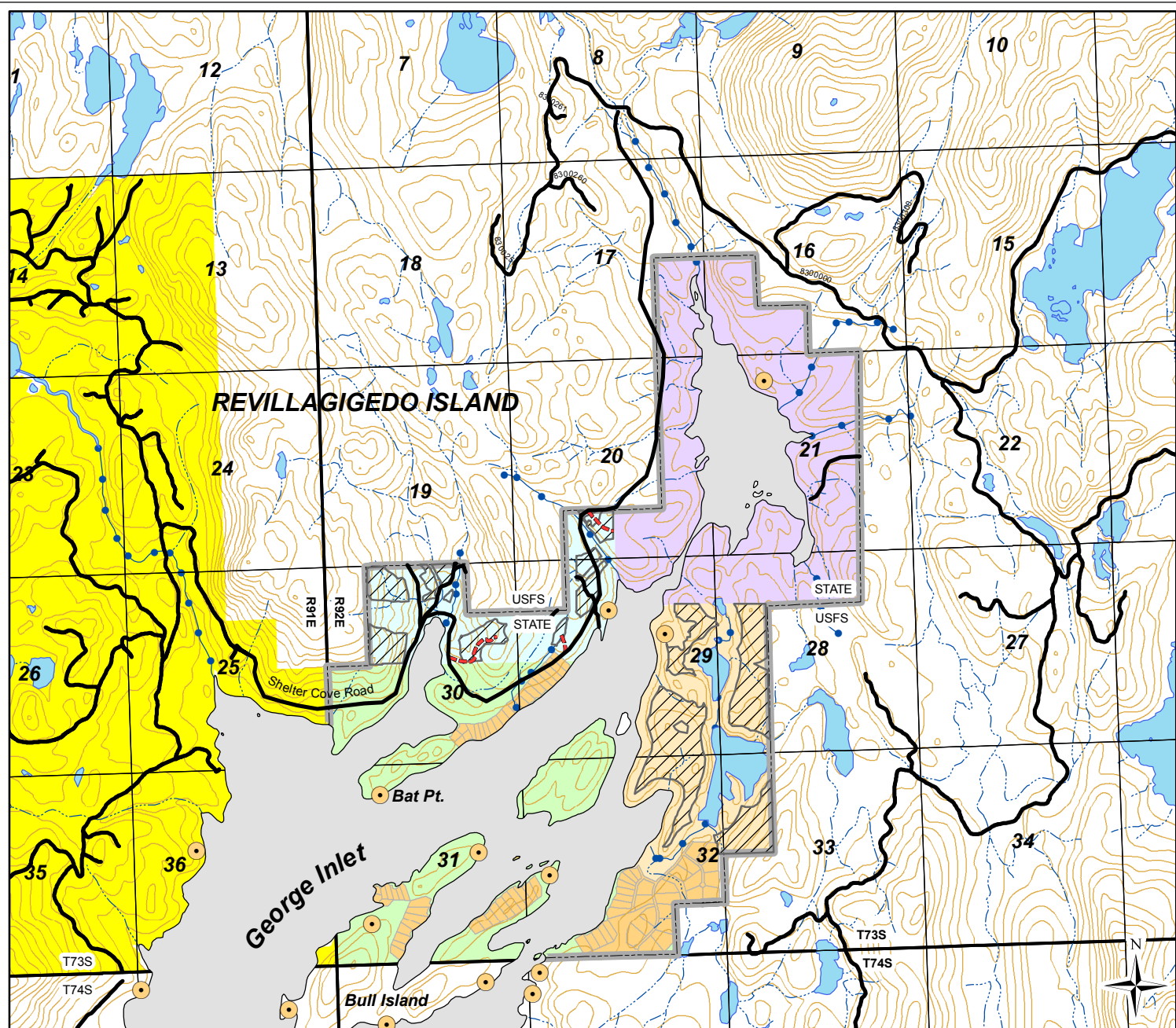


**DIVISION OF FORESTRY**

Date: 4/17/2018

JT

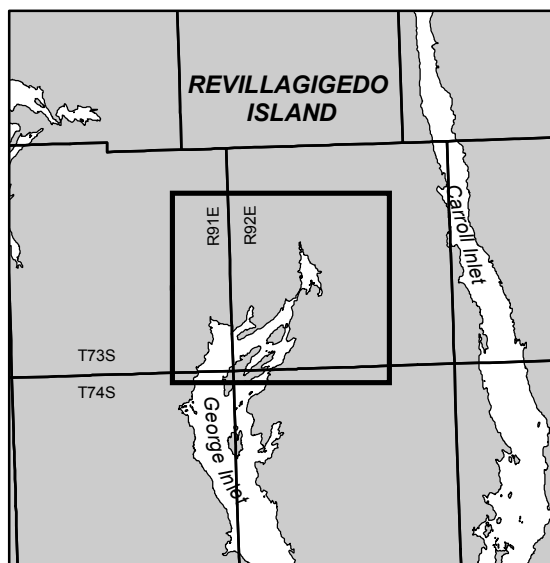




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1 inch = 4,000 feet

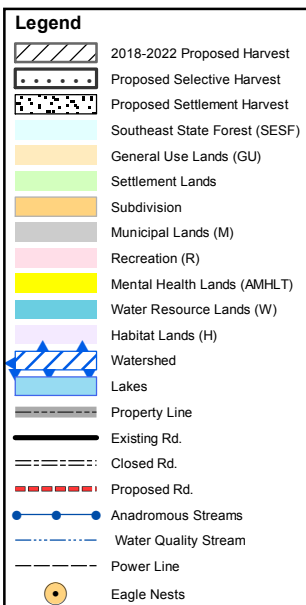
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1 in = 5.2 miles

**Vicinity Map**

(C.R.M.)



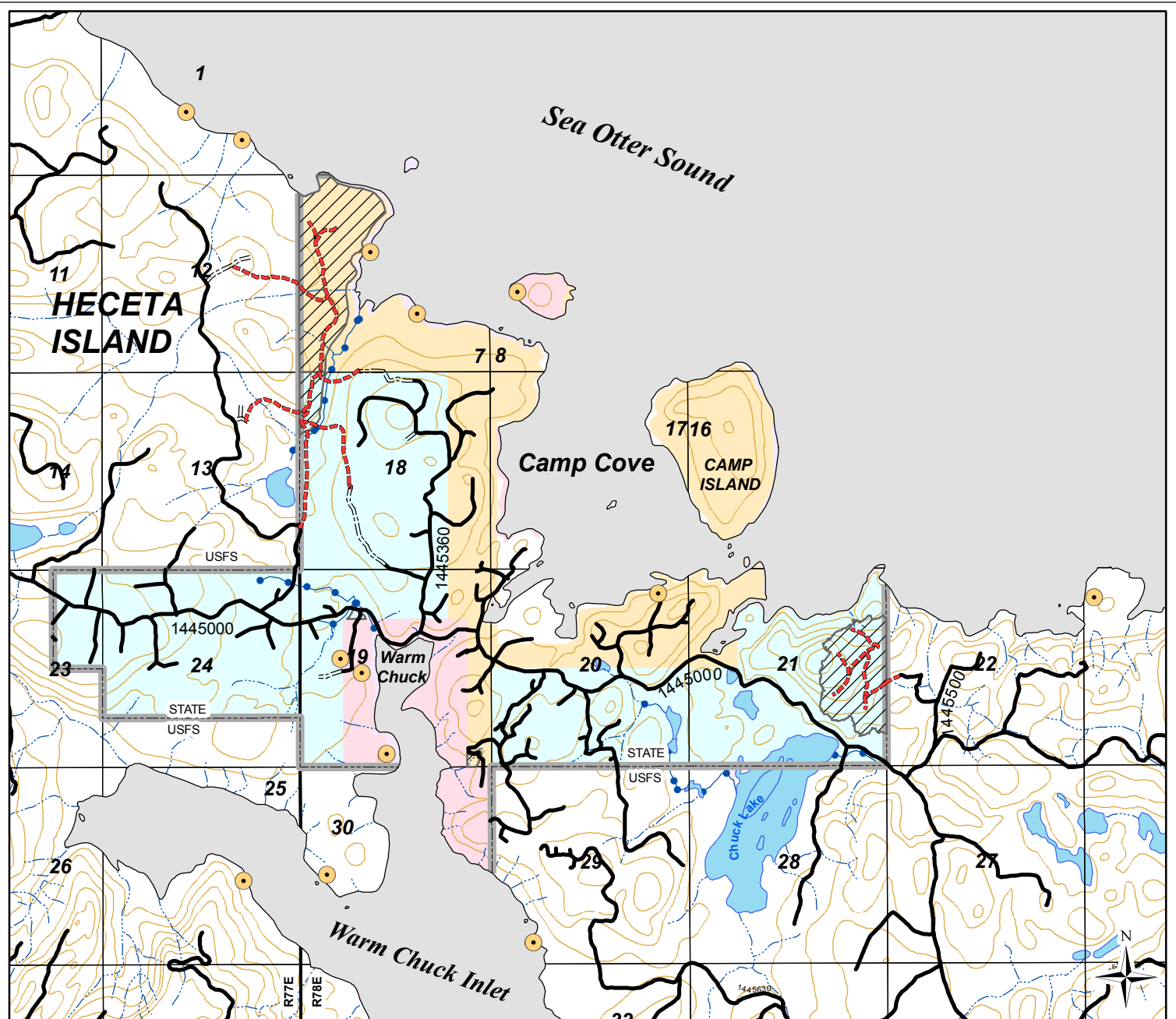
# GEORGE INLET AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022



**DIVISION OF FORESTRY**

Date: 4/17/2018

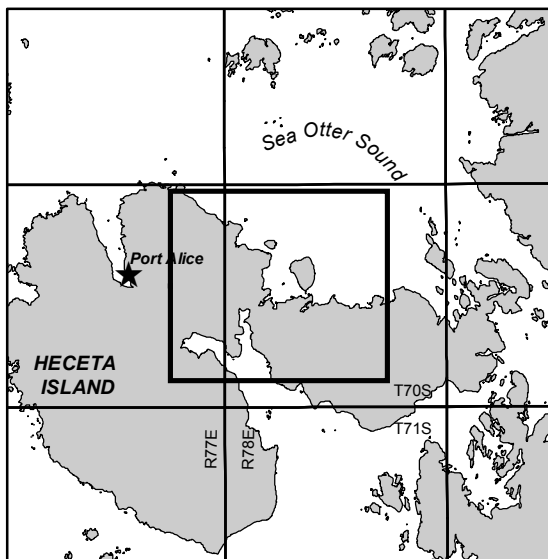
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1 inch = 4,000 feet

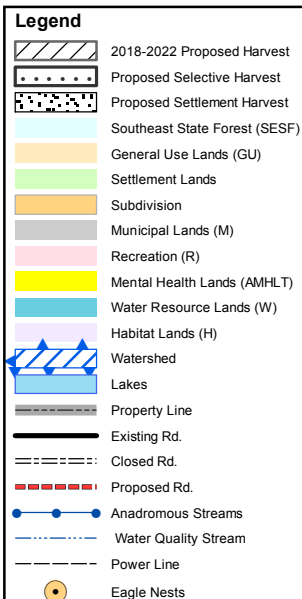
Contour Interval = 100 Feet



1 in = 5.2 miles

**Vicinity Map**

(C.R.M.)



# HECETA ISLAND AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022

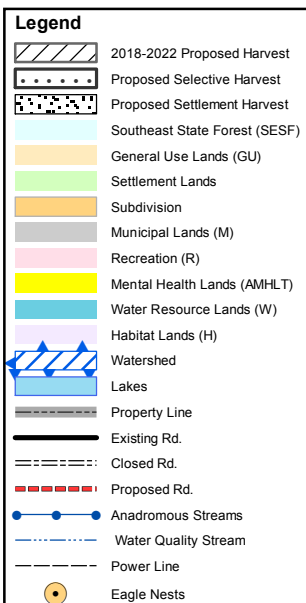
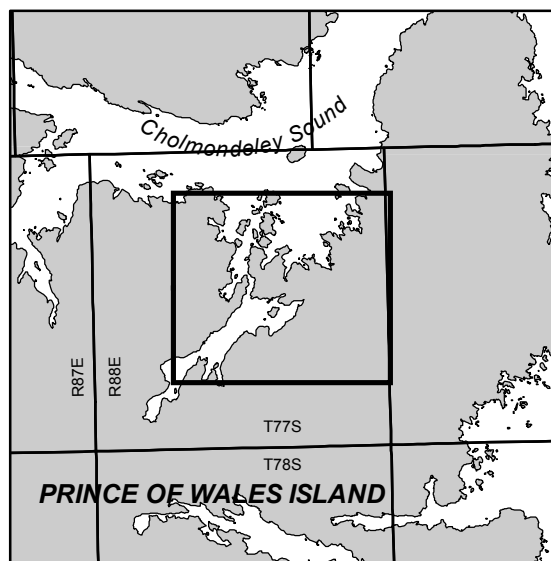
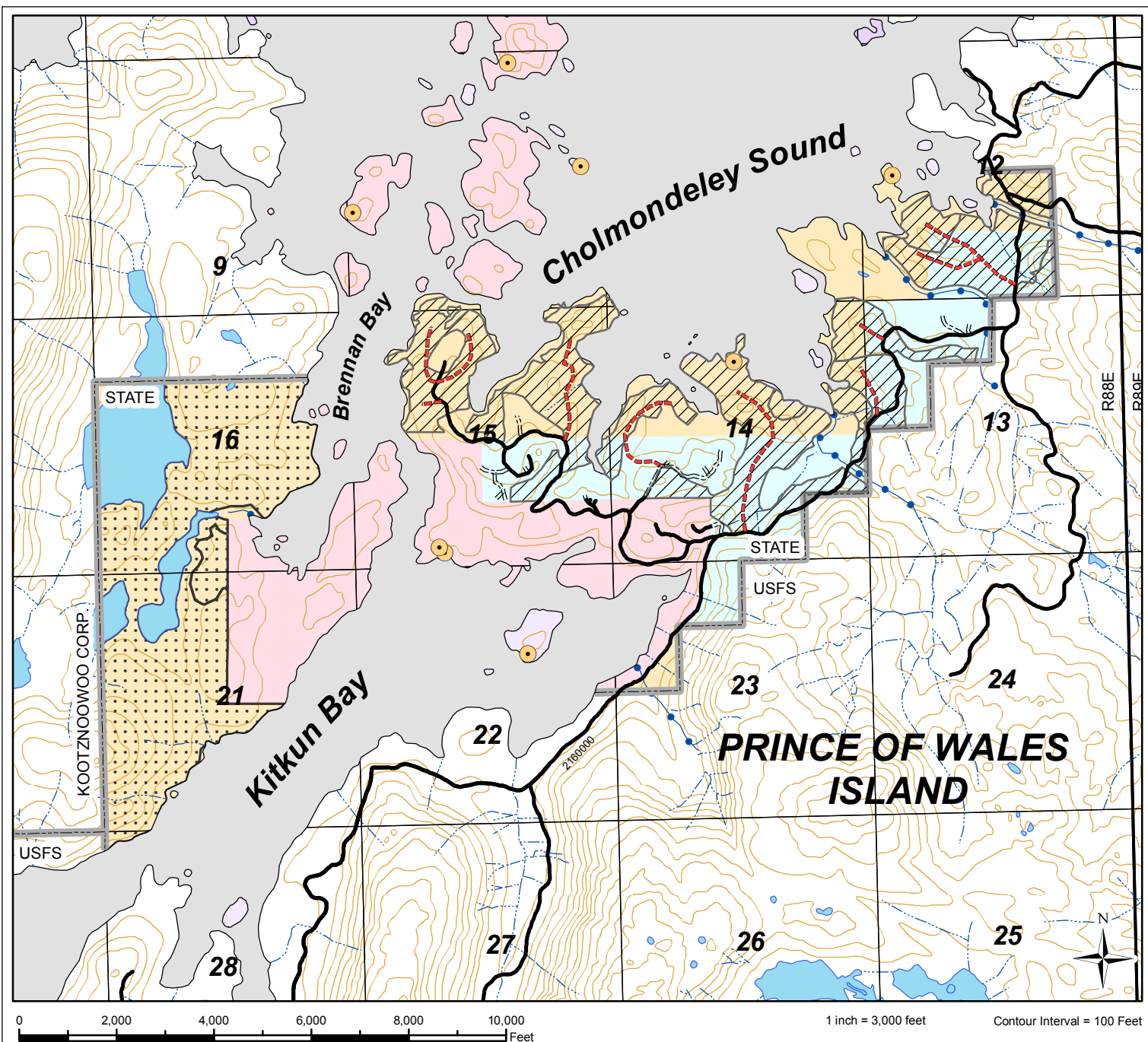


**DIVISION OF FORESTRY**

Date: 4/17/2018

JT





# KITKUN BAY AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022

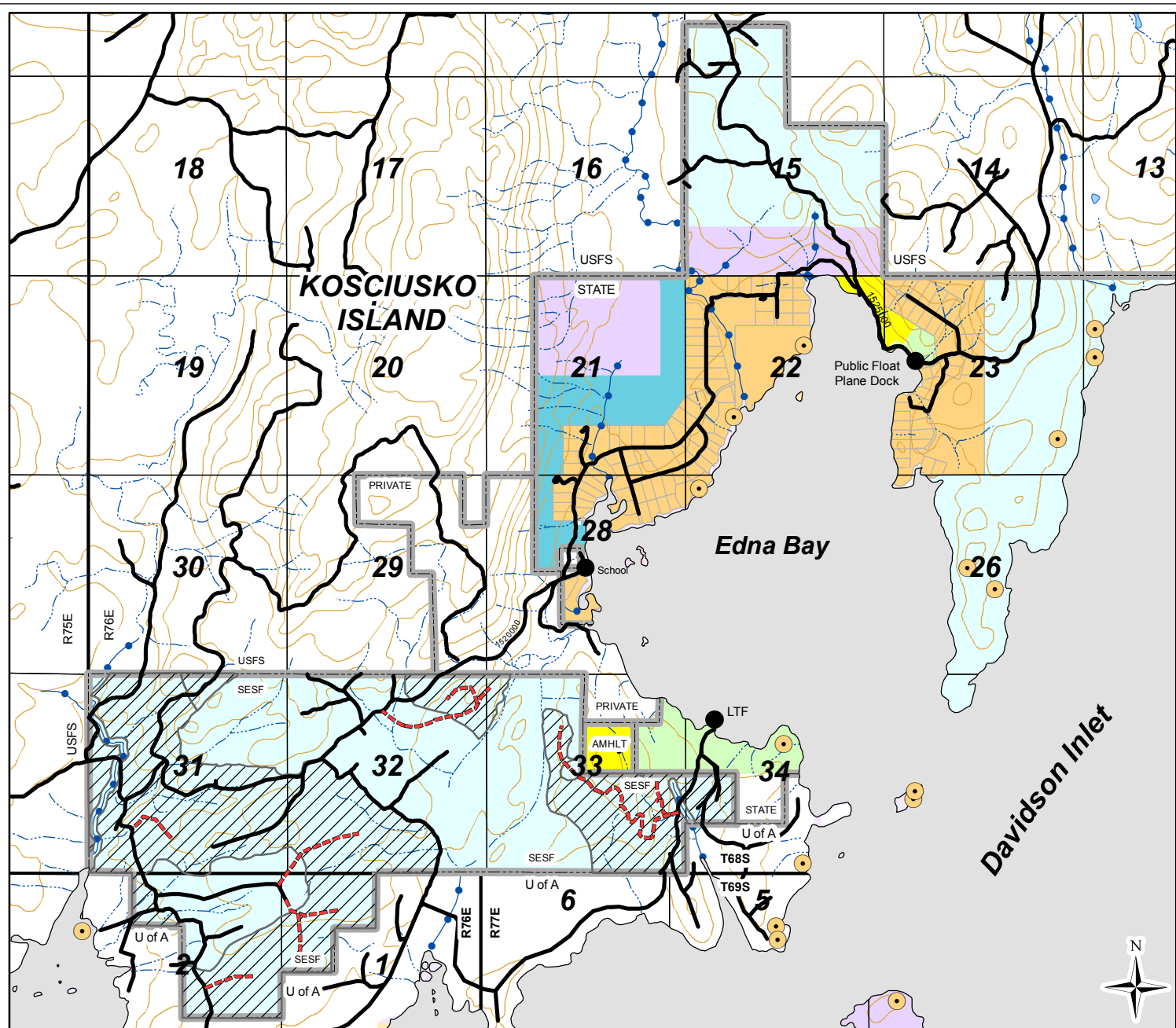


DIVISION OF FORESTRY

Date: 4/17/2018

JT

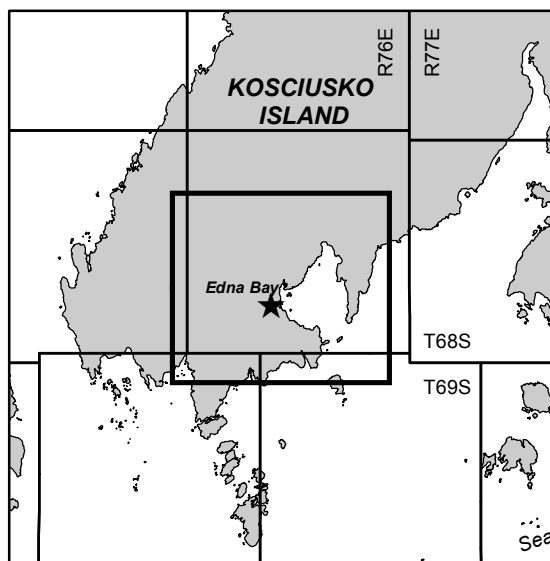




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Feet

1 inch = 4,000 feet

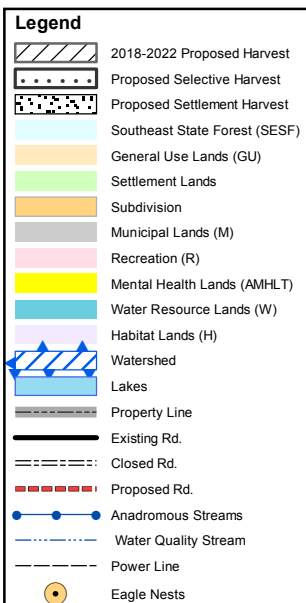
Contour Interval = 100 Feet



1 in = 5.2 miles

**Vicinity Map**

(C.R.M.)



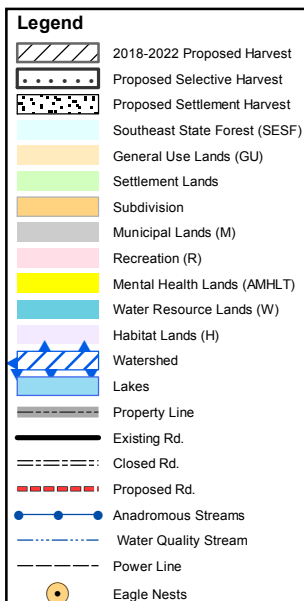
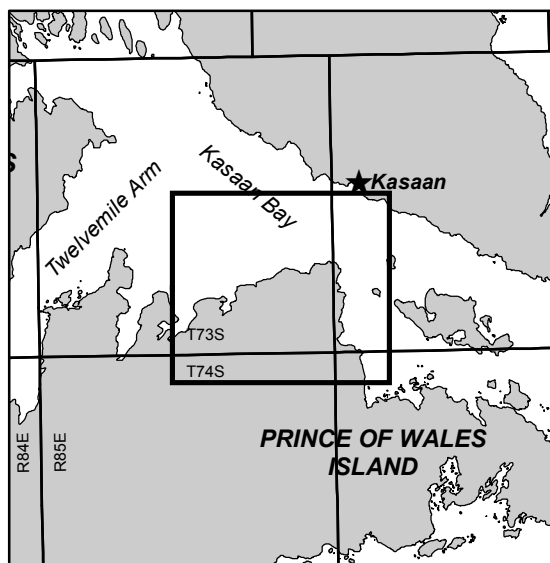
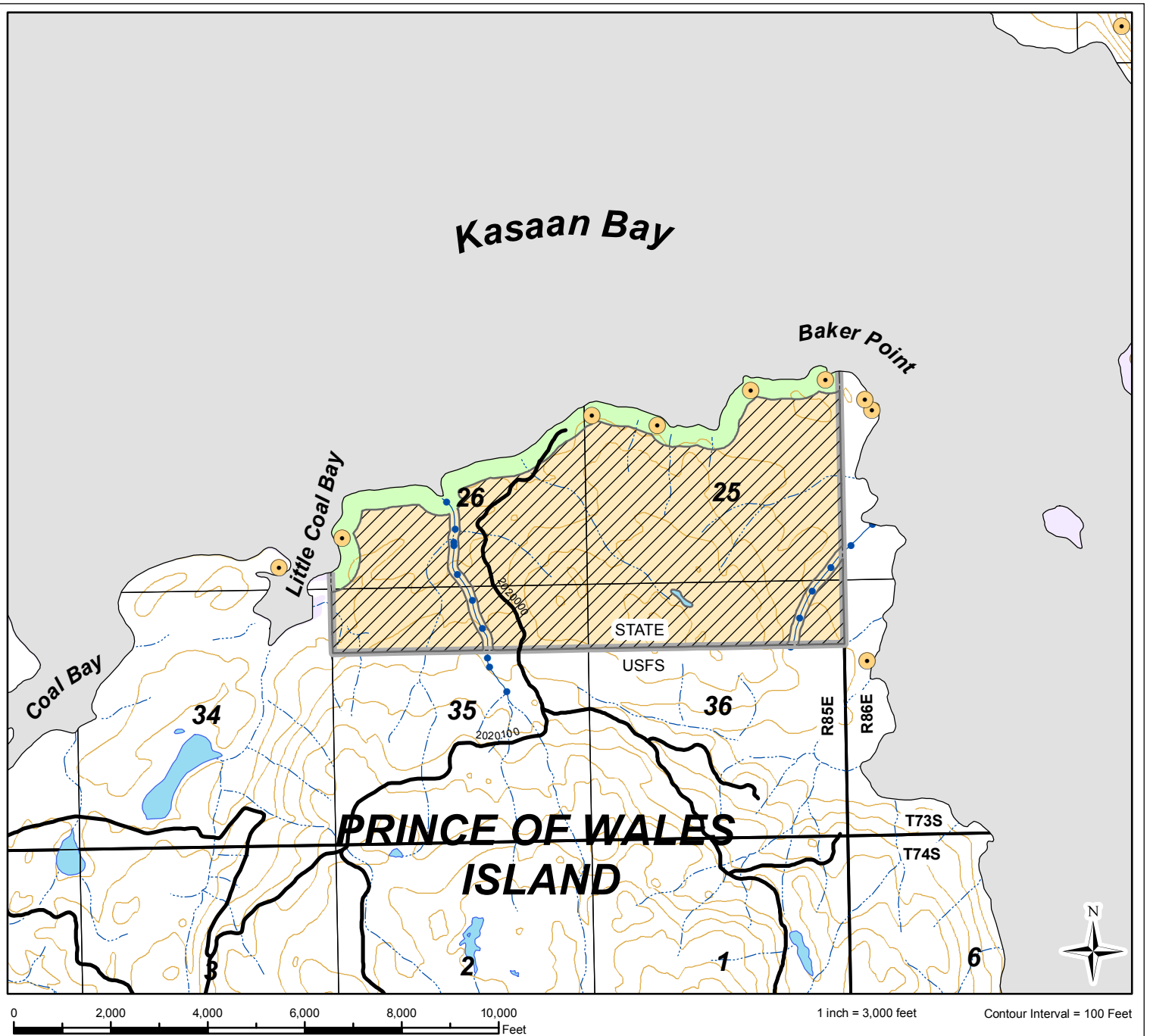
# KOSCIUSKO ISLAND AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022



**DIVISION OF FORESTRY**

Date: 4/17/2018

JT



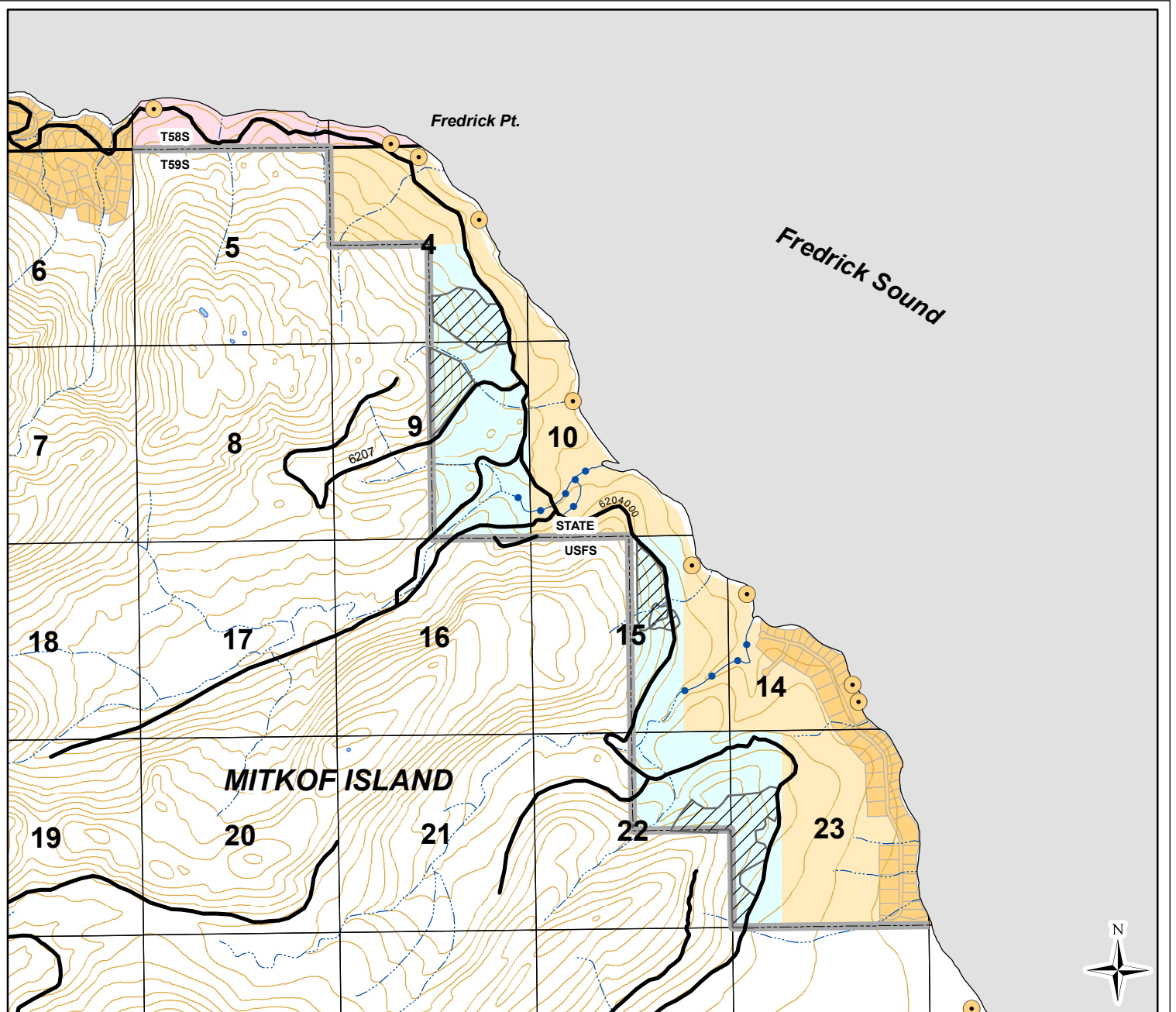
# LITTLE COAL BAY AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022



DIVISION OF FORESTRY

Date: 4/17/2018

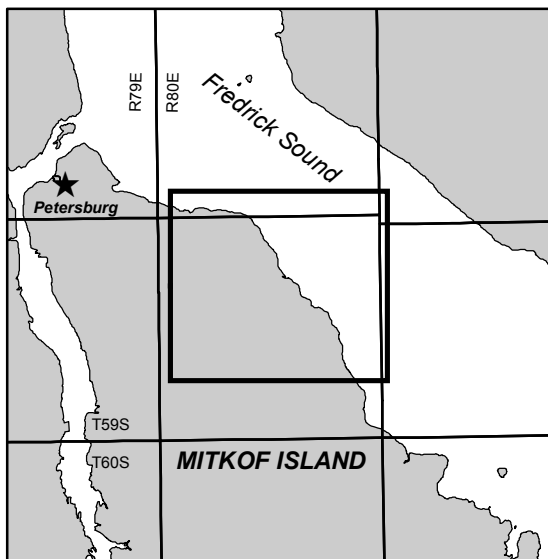
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0 2,000 4,000 6,000 8,000 10,000 Feet

1 inch = 4,000 feet

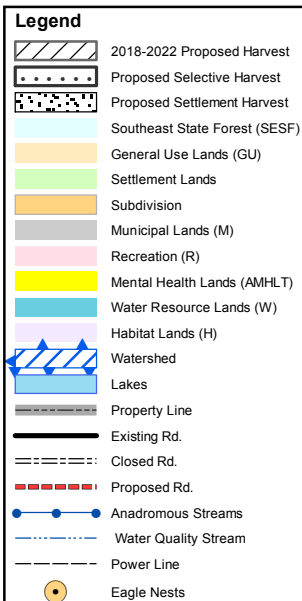
Contour Interval = 100 Feet



1 in = 5.2 miles

Vicinity Map

(C.R.M.)



# MITKOF ISLAND AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022

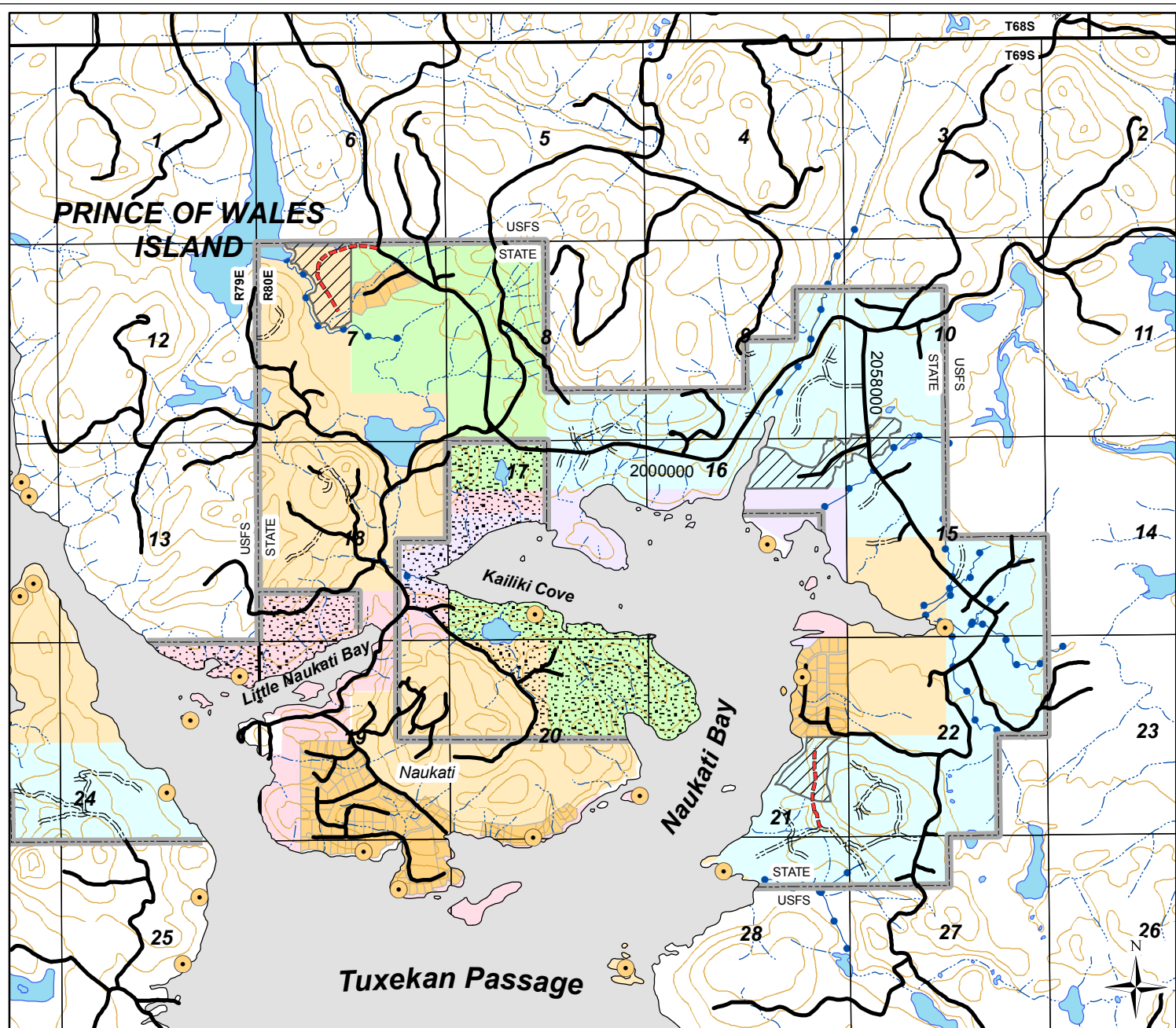


DIVISION OF FORESTRY

Date: 4/17/2018

JT

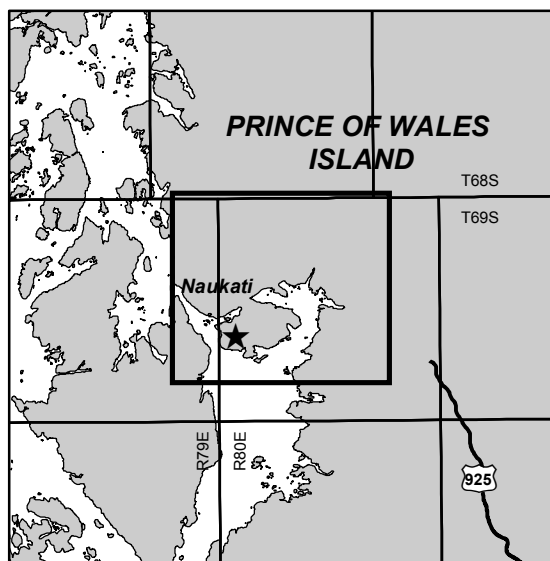




0 2,000 4,000 6,000 8,000 10,000  
Feet

1 inch = 4,000 feet

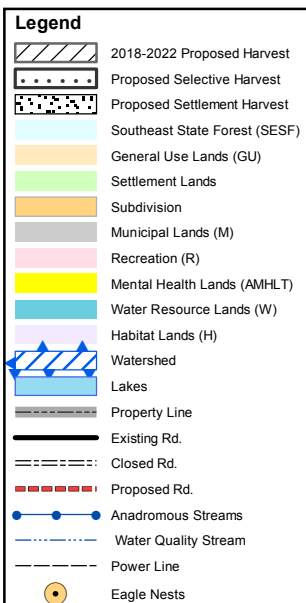
Contour Interval = 100 Feet



1 in = 5.2 miles

**Vicinity Map**

(C.R.M.)



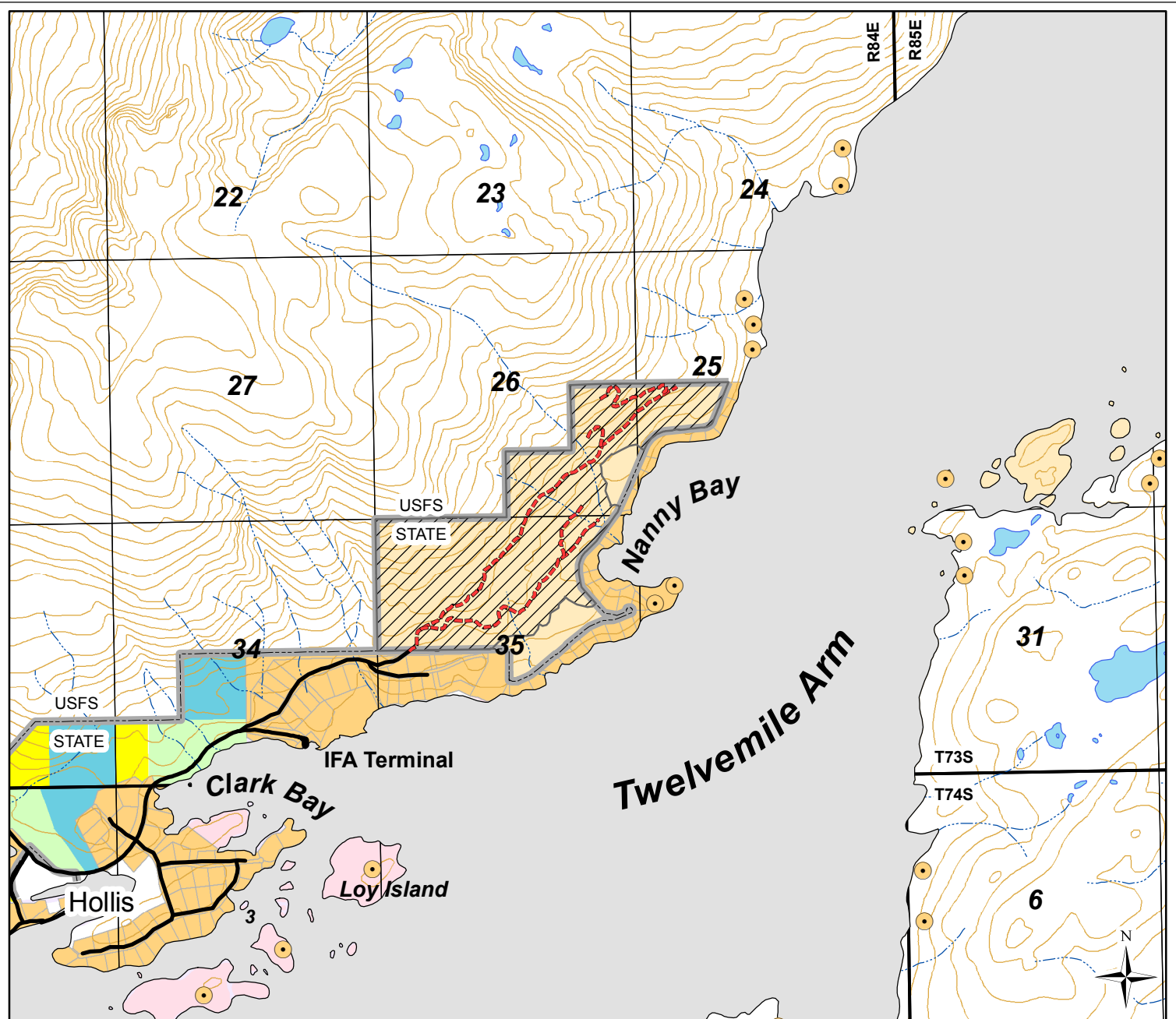
# NAUKATI AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022



**DIVISION OF FORESTRY**

Date: 4/17/2018

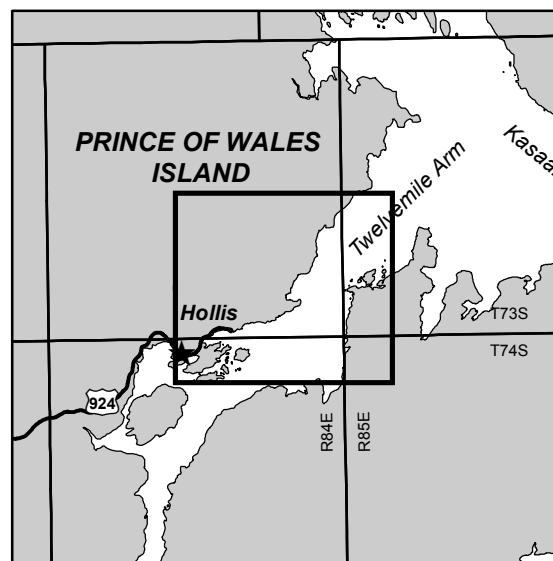
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0 2,000 4,000 6,000 8,000 10,000 Feet

1 inch = 3,000 feet

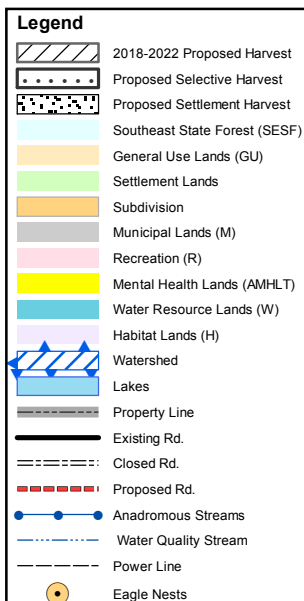
Contour Interval = 100 Feet



1 in = 3.9 miles

**Vicinity Map**

(C.R.M.)



# NORTH HOLLIS AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022

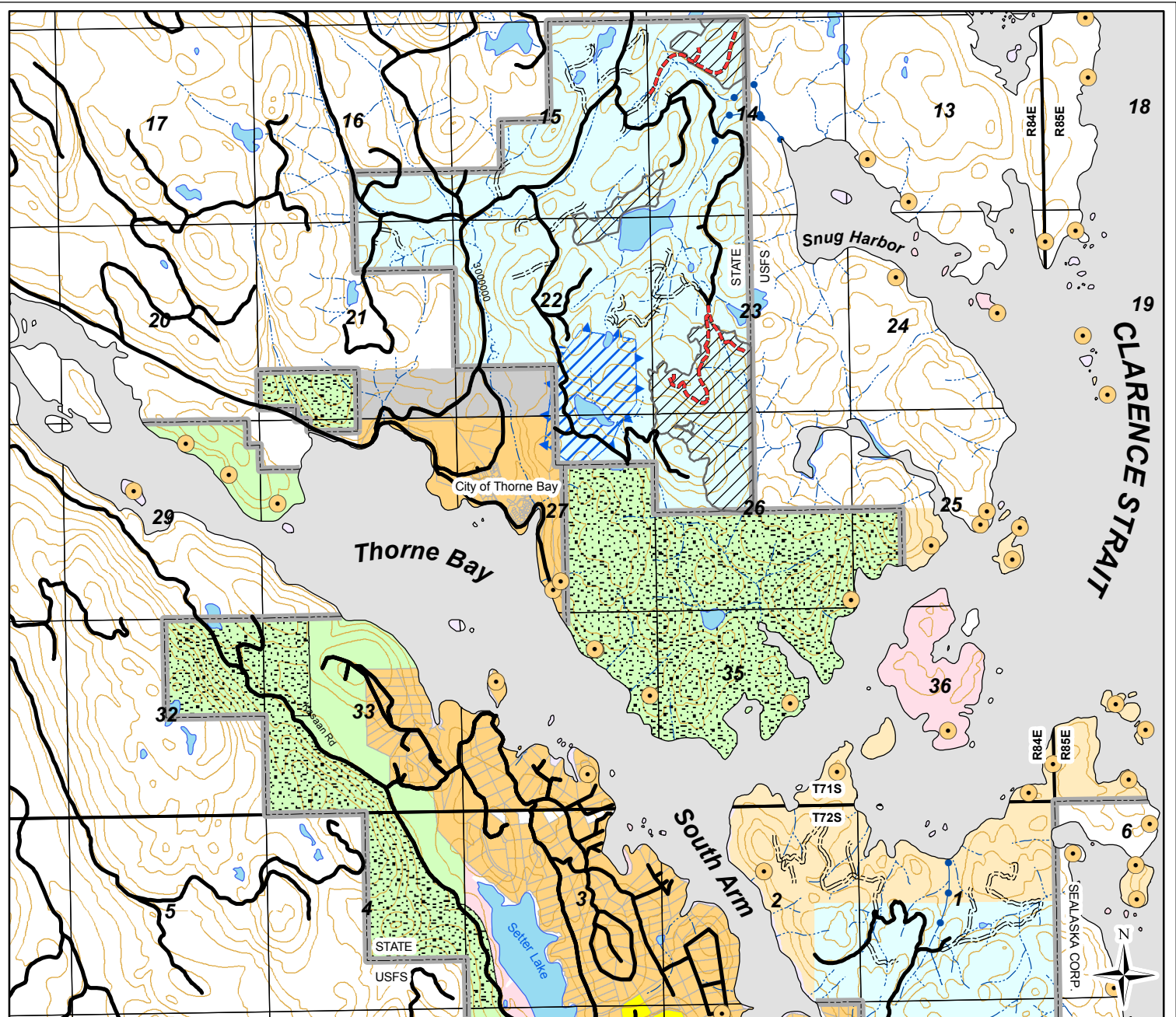


**DIVISION OF FORESTRY**

Date: 4/17/2018

JT

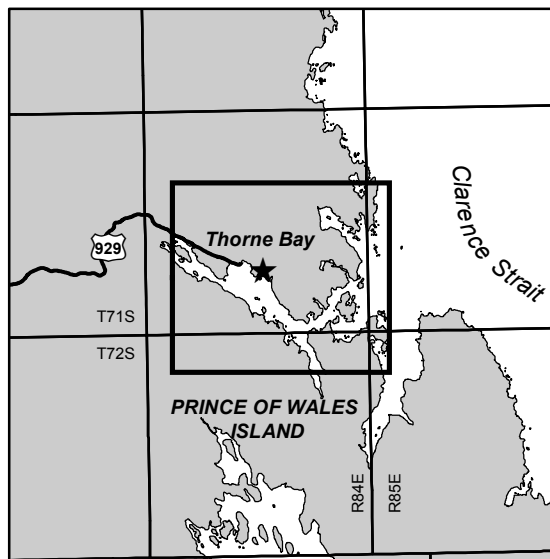




0 2,000 4,000 6,000 8,000 10,000 Feet

1 inch = 4,000 feet

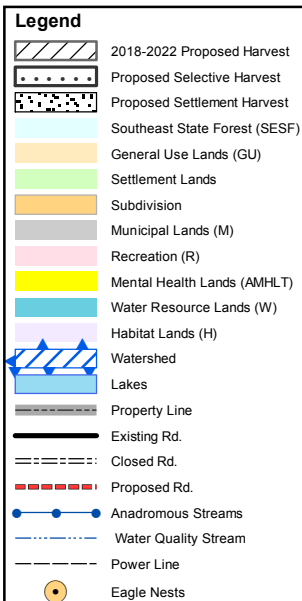
Contour Interval = 100 Feet



1 in = 5.2 miles

**Vicinity Map**

(C.R.M.)



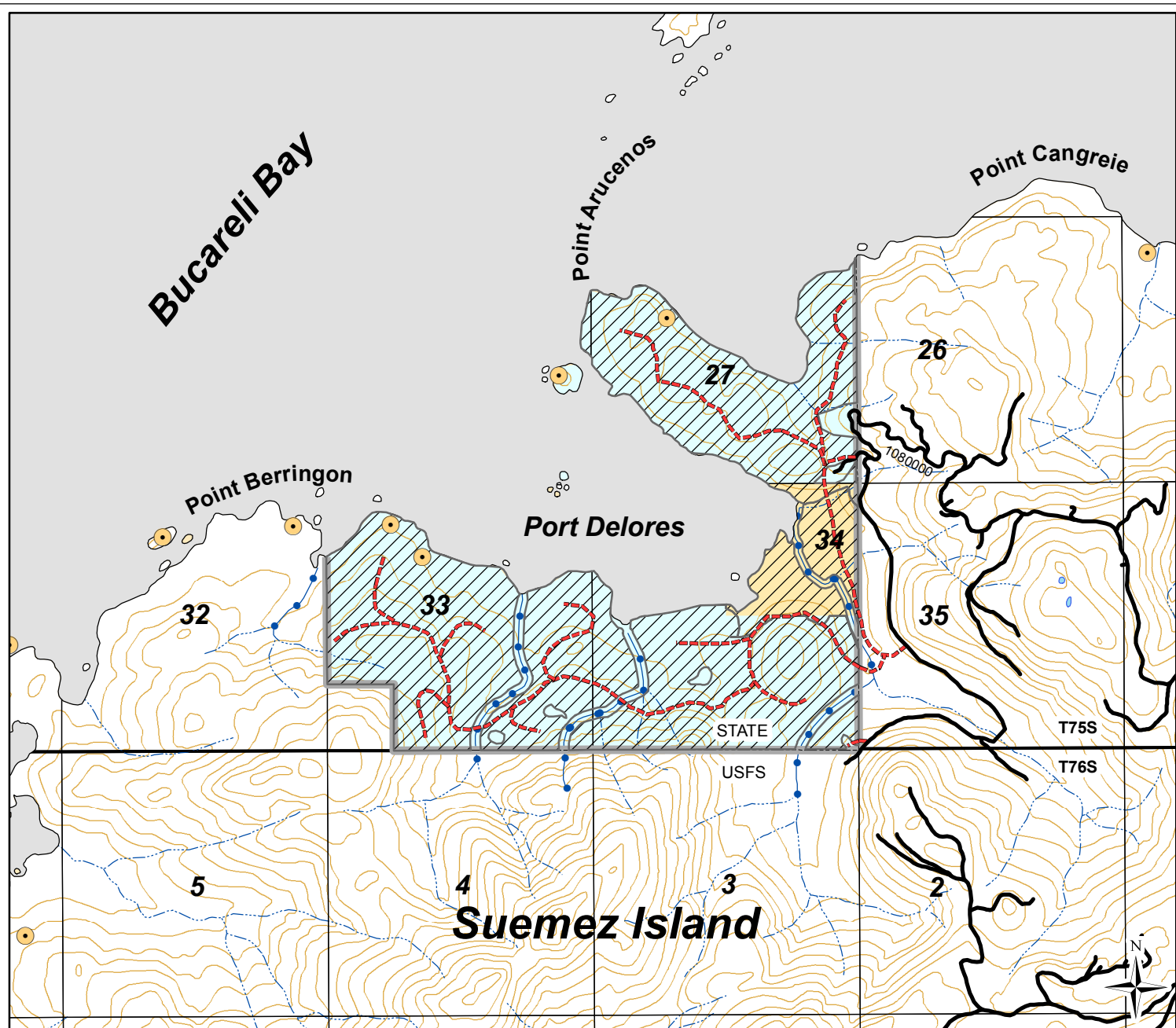
# **NORTH THORNE BAY AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022**



**DIVISION OF FORESTRY**

Date: 4/17/2018

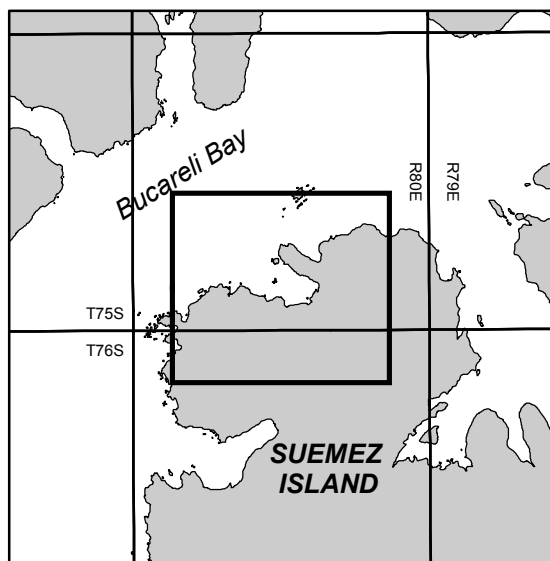
JT



0 2,000 4,000 6,000 8,000 10,000 Feet

1 inch = 3,000 feet

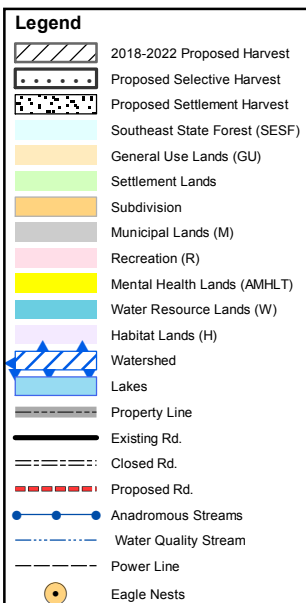
Contour Interval = 100 Feet



1 in = 3.9 miles

**Vicinity Map**

(C.R.M.)



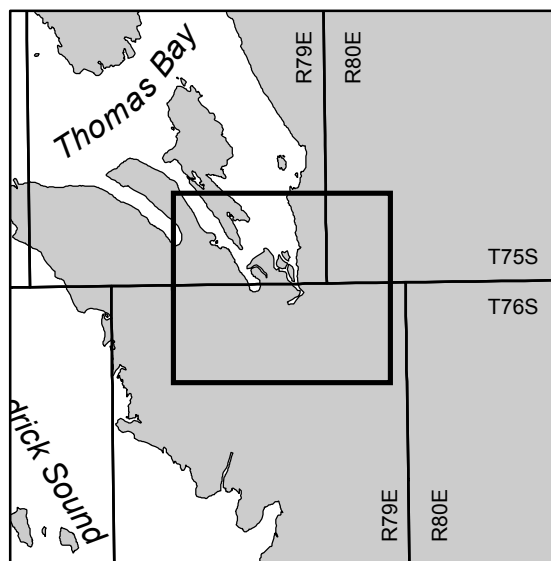
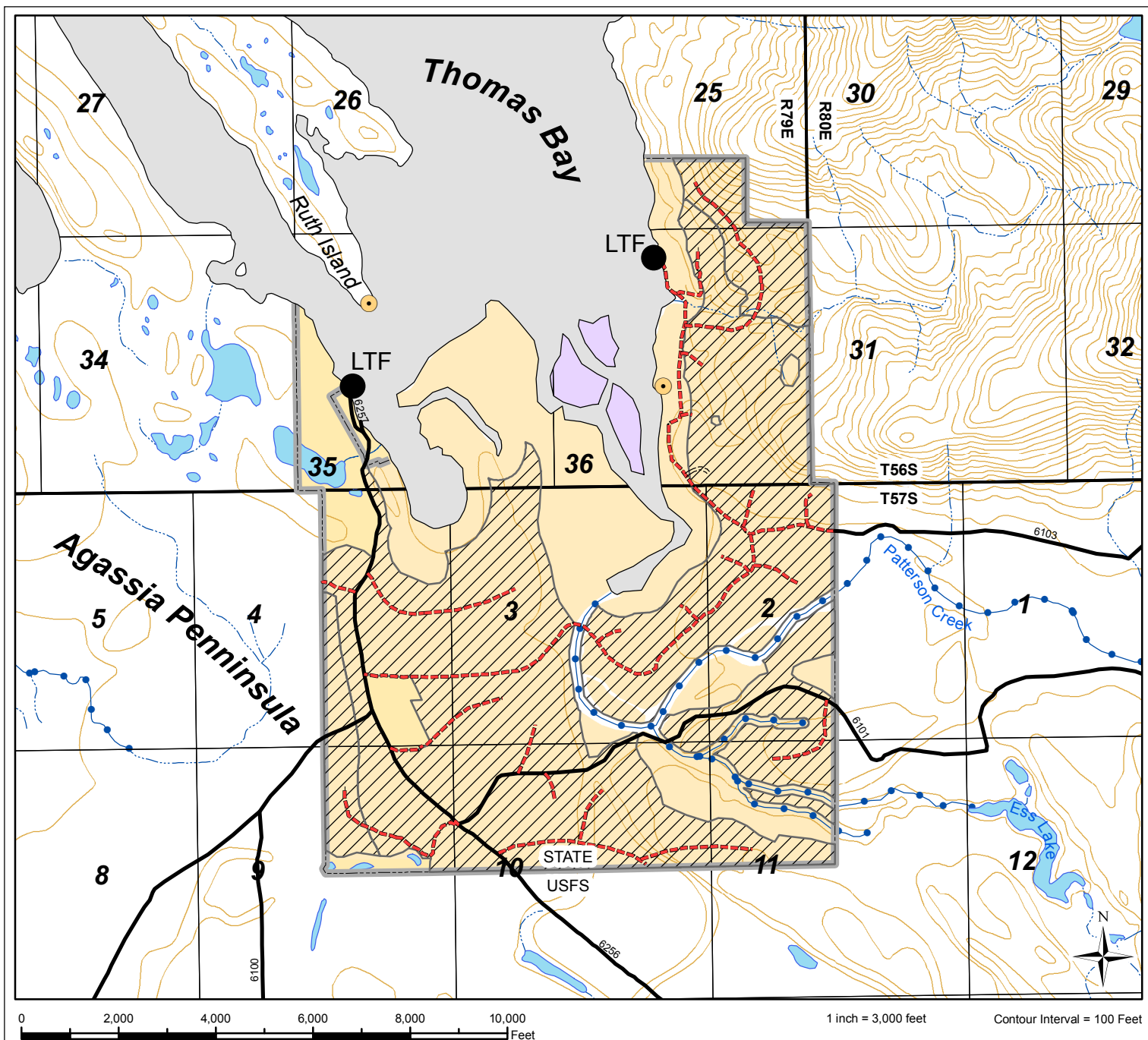
# PORT DELORES AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022



**DIVISION OF FORESTRY**

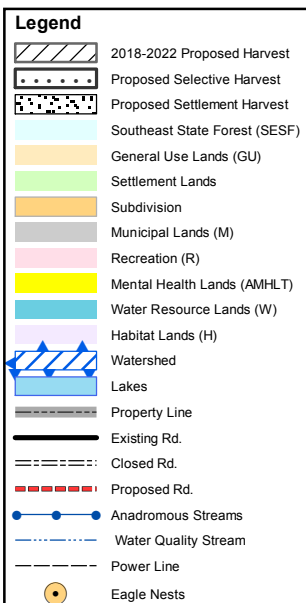
Date: 4/17/2018

JT



**Vicinity Map**

(C.R.M.)



# THOMAS BAY AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022

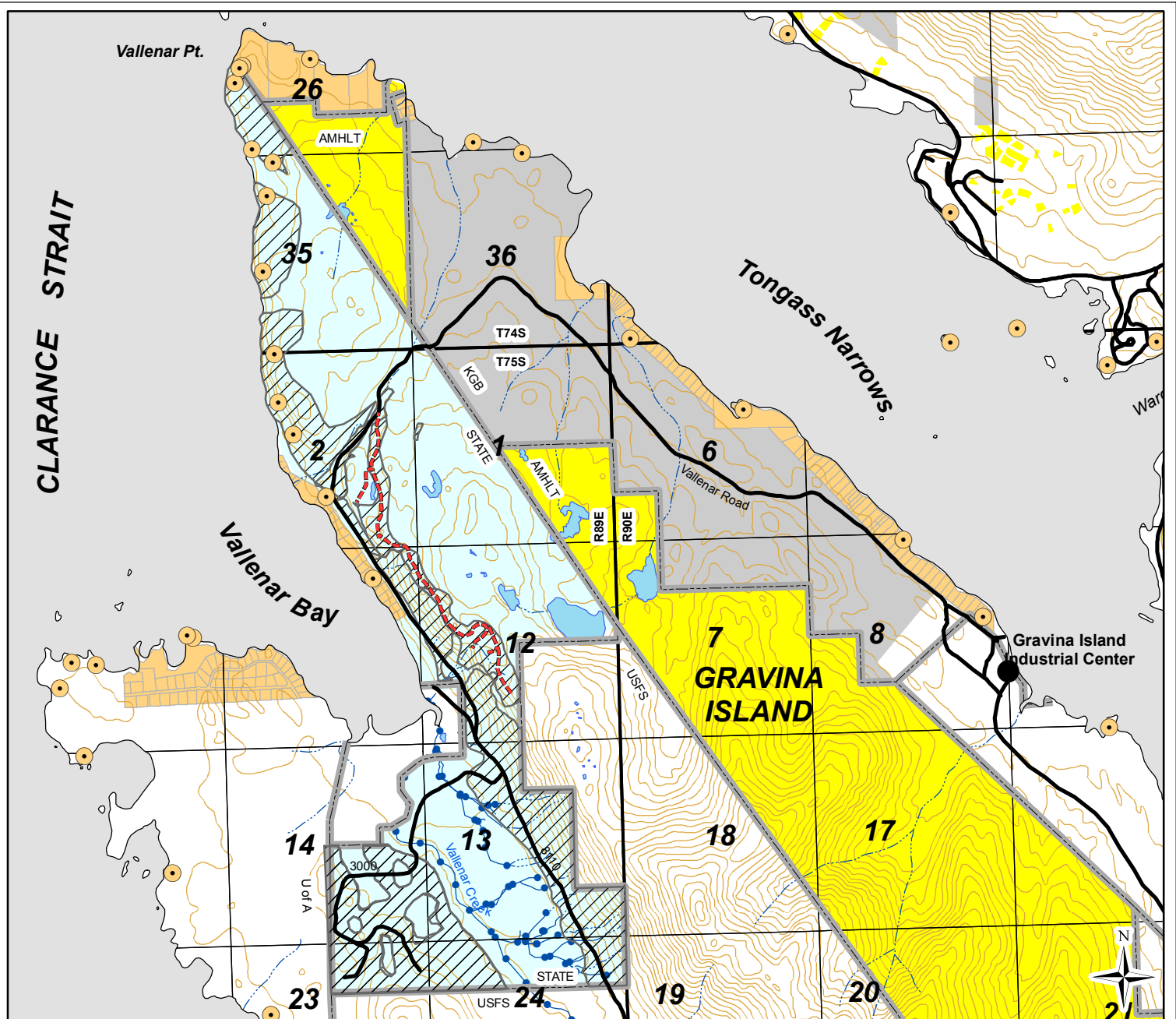


DIVISION OF FORESTRY

Date: 4/17/2018

JT

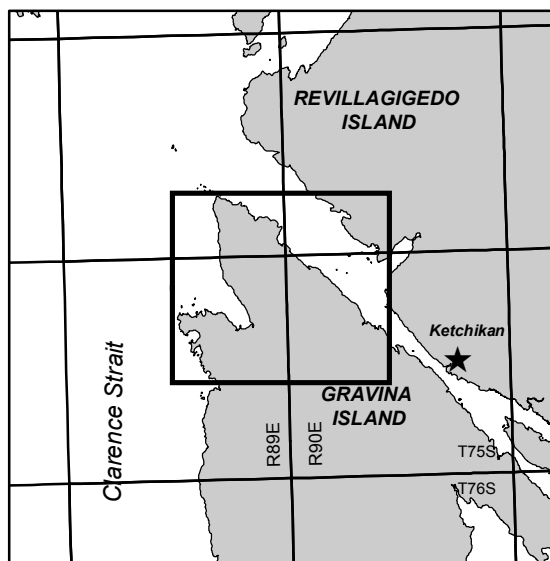




0 2,000 4,000 6,000 8,000 10,000 Feet

1 inch = 4,000 feet

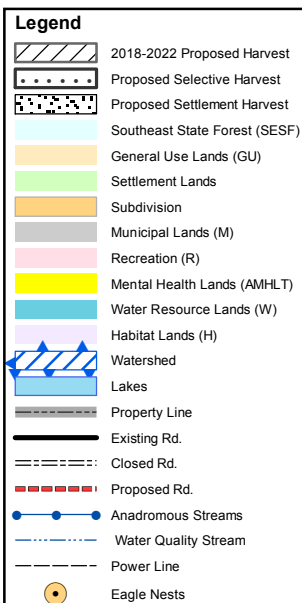
Contour Interval = 100 Feet



1 in = 5.2 miles

Vicinity Map

(C.R.M.)



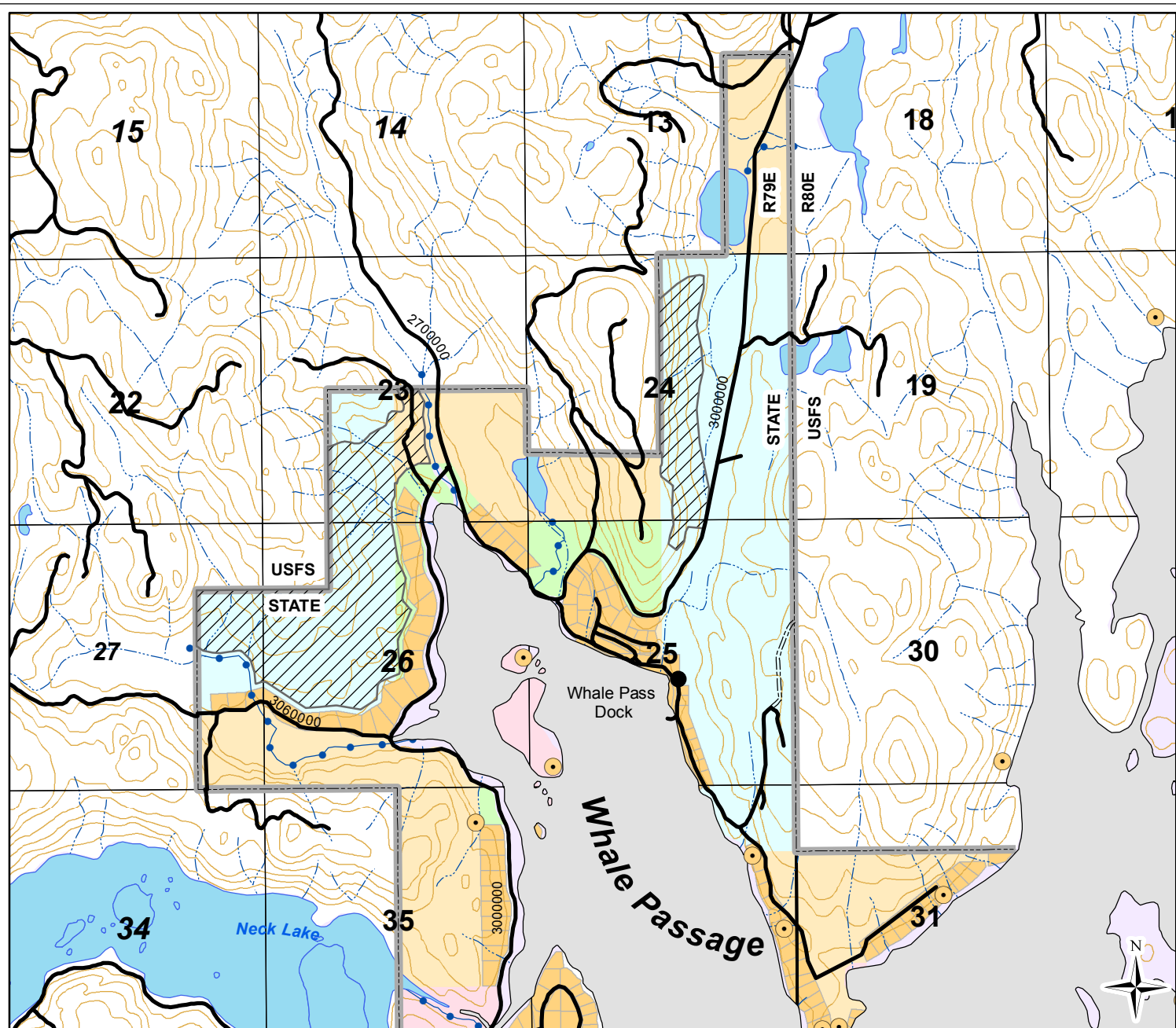
# VALLENAR BAY AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022



DIVISION OF FORESTRY

Date: 4/17/2018

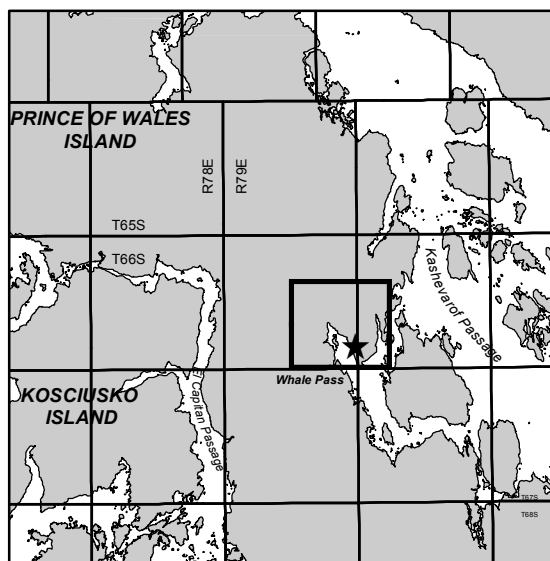
JT



0 2,000 4,000 6,000 8,000 10,000 Feet

1 inch = 3,000 feet

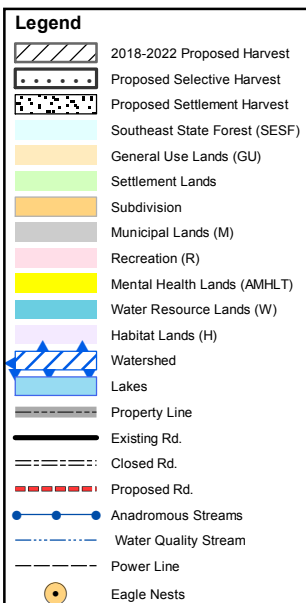
Contour Interval = 100 Feet



1 in = 8.6 miles

**Vicinity Map**

(C.R.M.)



# WHALE PASS AREA FIVE YEAR SCHEDULE OF TIMBER SALES CALENDER YEARS 2018-2022



**DIVISION OF FORESTRY**

Date: 4/17/2018

JT

## Appendix A

### Department of Natural Resources, Division of Forestry March, 2018

The following comments were received during the public comment period on the Preliminary Five-Year Schedule of Timber Sales Calendar Year 2018-2022.

Organization	Author	Location
ADFG-Habitat	Greg Albrecht	Douglas
ADFG-Habitat	Mark Minillo	Craig
ADNR DMLW Lands	Lee Cole	Juneau
ADNR-Office of History and Archaeology	Mckenzie S. Johnson	Anchorage
ADNR-Survey Section	Cliff Baker	Anchorage
Alaska Forest Association	Owen Graham	Ketchikan
Alaska Rainforest Defenders	Larry Edwards	Sitka
City of Petersburg	Mark Jensen	Petersburg
Ketchikan Gateway Borough	Ruben Duran	Ketchikan
Legislature	Jonathan Kreiss-Tomkins	Juneau
Petersburg Chamber of Commerce	Mara Lutomski	Petersburg
Petersburg Development Council	Liz Cabrera	Petersburg

Commenter	Comment	Response
	<b>Purpose/Land Base/ Management Intent</b>	
AFA	The Narrative for the Heceta sale mentions that the sale is located on both the Southeast State Forest and General Use lands but does not break down the acreage by land designation, include that breakdown.	The configuration of the sale has not been finalized. Additional agency consultation and authorization is required to proceed with the sale. Based on field work in 2016 the DOF has identified approximately 125 acres on State Forest Land and 166 acres on General Use land that may be feasible to market.
AFA	AFA supports the concept of the DOF working with the Division of Mining, Land and Water (DMLW) to develop future subdivisions on State lands designated Settlement within the various Area Plans for State lands in southeast. The additional volume of timber that would come from the six areas listed in the schedule (North Thorne, El Cap, Whale Pass, Naukati, George Inlet and Little Coal Bay) could help alleviate timber supply issues. There is however, insufficient information within the DFYSTS to determine if such coordinated land management would prove feasible especially in an isolated area such as Little Coal Bay.	Subdivision Land has a limited potential for supplying significant timber. It can be subject to the subdivision decision and development process as well as more complex permitting requirements. Community needs and priorities also add to the complexity and operating costs. The development of this type of land generally takes longer than the typical timber sale.
AFA	AFA suggests that the DOF once again issue Best Interest Findings and Forest Land Use Plans at the same time.	The DOF has chosen to manage its workload by separating the two. In many instances, this has provided flexibility to adapt as additional information has developed. Where resource information and plans are complete, the DOF will combine the two processes.
AFA	AFA suggest that the following areas be included in the 2018-2022 FYSTS: GU lands at Whale Pass adjacent to SESF lands on USFS Forest System Road #3000000, State lands at Exchange Cove available for timber harvest per the Area Plan and the State lands designated commercial settlement within sections 7, 17 and 18, T74S, R83E near the junction of the Klawock-Hollis highway and the road to Hydaburg.	The DOF will consider including those areas in future FYSTS.
ARD	The FYSTS implements a massive timber sale program that is contrary to the needs of southeast Alaska communities. Defenders submits that you need to reconsider the entire schedule as a matter of responsible public policy and downscale the program in a manner so as to narrowly tailor timber sales for the needs of smaller, local mills by prohibiting raw log exports and avoiding planned timber sales or related infrastructure developments such as roads and LTFs in identified community use areas or key habitats.	Comment noted. The FYSTS is a scoping document. It is not a decision document. It is a tool that DOF uses to become aware of issues and concerns.
ARD	The FYSTS fails to provide sufficient information to determine whether or not the proposed volume is excessive relative to the Division of Forestry's local business goals.	The FYSTS provides an indication of what may be possible. The appropriateness of a sale's size is decided in the Best Interest Finding for each timber sale.
ARD	ARD submitted multiple statements that the FYSTS fails to conform with the	The FYSTS is a scoping document. It is not a decision. The DOF has

Commenter	Comment	Response
	appropriate area plans based on footprints in the maps and the short sale descriptions.	attempted to represent potential project footprints in a manner that with refinement may be compatible with the area and forest plans.
ARD	George Inlet: Concern for lack of DOF consideration for a variety of unspecified resource uses noted in the area plan.	
ARD	Petersburg: The Petersburg Borough is seeking conveyance of both land parcels scheduled for logging there in 2022. The Division of Forestry's plans would undermine those objectives and devalue potential municipal assets. For these reasons alone, the Division of Forestry should remove these sales from a revised FYSTS.	The DOF will delay significant planning and commercial forest operations in these areas until the State reaches a resolution for the conveyance of land to the Borough of Petersburg.
ARD	Petersburg: The FYSTS does not provide the "sufficient information" about the Mitkof Island area sale required under the Alaska Land Act.	The amount of information is comparable to what has been supplied in the past and found adequate for this purpose. The combination of the maps and the general site descriptions provides a reasonable physical limitation to the scope of public comment. The information provided was sufficient to receive comments from the Alaska Forest Association, the ADFG, the Petersburg Chamber of Commerce, the Petersburg Economic Development Council, the Petersburg Borough, and your organization on aspects of the timber sale.
ARD	Petersburg/ Thomas Bay: the FYSTS does not provide sufficient information to enable public comment.	The DOF has provided the gross footprint of the sale area. It is likely as planning progresses, that the footprint will change based on information provided by the public, agencies and field work. The FYSTS is meant to start this process. No change required.
DMLW-Baker	North Thorne Bay Area: In the narrative add to DMLW's proposed harvest in Sections 32 & 33, T71S and Section 4, T72S, R84E CRM. Would it be worth mentioning (at this time) that roads constructed for timber harvest within settlement lands would not be constructed under the silviculture exemption? Timber harvest roads providing access to and within settlement lands are intended to remain open for public use, therefore should be constructed under the appropriate Clean Water Act provisions.	The use of the silvicultural exemption (Section 401 or 404) for the construction of forest road is related to its purpose not whether it remains "open" and experiences other incidental use. If the area is to be used for dedicated residential use in the near term, the DOF concurs it would be appropriate to acquire permits to represent the long-term use of the road.
DMLW-Baker	North Hollis Area: New harvest roads through this area are also intended to provide access to the north end of Clark Bay North subdivision. Roads should not be constructed under the silviculture exemption in order to remain open for public access.	
DMLW-Juneau	The Alaska Department of Natural Resources/Division of Mining, Land, and Water/Southeast Regional Office (SERO) recommends working with the Division of Forestry ("DOF") to identify those roads that have high potential for transportation across state land. SERO recommends that at a minimum, the identified roads and transportation corridors be surveyed, platted and dedicated to the public, especially those roads and transportation corridors outside of the Southeast	The DOF supports access to the State's resources and the development of transportation corridors needed for the development of the State. The DOF documents infrastructure on the lands it manages as a course of doing its mission. We will work with the DMLW to determine the extent legal easement documentation is required to this to maintain the State's best interest on a case-by-case basis. The platting process is outside typical DOF needs on General

Commenter	Comment	Response
	State Forest (“SESF”). In addition to these platted and dedicated roads and transportation access corridors, SERO may determine that easements may be necessary for DOF for road or transportation corridors in some areas. However, SERO requires further information to make these determinations.	Use land. Additional time, funding resources, and technical support are required when this task is called for.
DMLW-Juneau	It is unclear to SERO where the source locations are for materials to construct the proposed roads.	Material sources typically are developed on and adjacent to the proposed forest road.
DMLW-Juneau	It is unclear to SERO where a designated site for excess side cast materials is needed for this large project. If such a disposal area is needed, it is likely that a land use authorization will be required.	The style of construction (overlay) does not typically generate significant amounts of excess material requiring disposal. The DOF will work with DMLW in cases where this occurs.
DMLW-Juneau	<p>“Reductions in acreage for such things as vegetative cover that is capable of growing commercial timber, known resident high value and anadromous stream retention areas, exclusion zones listed in the area plans, and costal buffers.” (Page 7, DYSTS 2018-2022).</p> <p>i. SERO acknowledges and supports DOF’s plans to reduce such acreage from the timber harvest.</p> <p>ii. It is in the public interest and best interest of the State of Alaska to protect these designated areas that are essential to the economy and livelihood of the citizens in southeast Alaska.</p>	The reductions mentioned are known resources that the DOF has accounted for in the development of the annual allowable cut. During the actual development of the timber sale, these and other resources will be confirmed.
	<b>Timber Harvest Methodology</b>	
AFA	It would be helpful to have additional information provided in the DFYSTS for several of the proposed sales. Narratives for proposed sales that include both conventional and helicopter harvest system should include an estimate of acres and volume by each harvest system. The estimated of miles of road per sale is another invaluable piece of information	The DOF agrees that these parameters are needed to appraise a timber sale. The FYSTS is not that level of planning or decision document. For most of the timber sales, the figures cited are rough estimates and represent the existing data. The volumes, types and age classes are based on aerial photos and limited ground verification.
AFA	Several of the proposed timber sales (Vallenar, Heceta and Kosciusko Island) listed within the Summary of Activities include both old growth and young growth timber stands; please include separately, the estimated volume and acres of young growth and old growth within the sale.	In the future as funding is available, the DOF will develop additional inventory information on its timber. A more definitive allocation by timber type in this document is premature due to the variability of the stands and potential constraints.
AFA	The DFYSTS uses several different terms when describing what type of timber harvest will occur within a proposed timber sale. Please clarify what is meant by the following terms; “conventional and helicopter harvest methods”, “helicopter harvest methods”, “selectively harvested wood” and “mix of both helicopter and conventional shovel logging systems using clear-cut and selective cut harvest methods”	The DOF will work towards consistency of terms. Conventional logging systems are defined as high lead/skyline cable systems and shovel logging. The DOF envisions that these systems will be used for clear cut harvesting. Helicopter logging refers to the yarding of a log via a helicopter to a road landing or barge. The DOF does not envision clear-cut harvesting timber with a helicopter due to cost concerns and the variability of the wood quality. The use of a helicopter would be limited to areas operationally restricted by terrain and the density of timber; essentially a partial cut where timber is selected to be harvested. The determination of timber quality worthy of helicopter harvest will be initiated by the DOF. A

Commenter	Comment	Response
		contract mechanism will accommodate some adjustments based on market values at the time of harvest. The term “mix” indicates that the area may need several different discrete logging systems to harvest all of the area identified; the use of the more than one system may or may not be economical for a variety of reasons.
AFA	How will the DOF determine what wood is to be harvested under a harvest prescription that uses the terms, “selective cut” or “selectively harvested”? Will it be based on a volume per acre, tree diameter range, or tree marking done by DOF or the purchaser?	The DOF has noticed the difficulty of communicating on this topic with operators. Timber harvests in this region are typically clear cuts. Resistance to partial cutting is based on cost, safety and residual timber conditions. Costs of a partial cut harvest are generally acknowledged as more expensive but may be appropriate depending on the timber type and land management goals. The DOF will work with purchasers on partial cut implementation and selection methods that are achievable.
AFA	The DOF should be aware of the possibility of there not being industry capacity for harvesting via helicopter in the future. This last winter, Columbia Helicopters sold much of their infrastructure needed to operate in Southeast. The current lack of available helicopter volume at this point in time (2018) could result in Columbia Helicopters leaving southeast Alaska and not returning.	Noted.
AFA	To cover the actual cost of harvest by helicopter, any log flown must be worth at least \$700.00 per mbf; if a barge is needed for harvest activities then the value of the wood flown must be more than \$900.00 per mbf. The minimum volume harvested by helicopter should be at least 3+ MMBF. This minimum amount can fluctuate either up or down depending upon location, access and proximity to additional helicopter volume.	The DOF does not see itself logging with a helicopter on State land without partnering with adjacent landowners that are employing the system. The DOF holdings and annual allowable cut are not large enough to facilitate helicopter use on only State land.
AFA	Both Viking and Alcan need an annual volume of between 20-25 MMBF to maintain their current operations. Having volume under contract equal to three years of annual output allows these 2 operators to meet the demands of ever changing market conditions while operating efficiently; maintain a reliable skilled workforce, and replace or upgrade mill and logging equipment as scheduled. Living “hand to mouth” limits future investments. AFA request that DOF provide larger volume, longer term sales than what DOF has offered historically.	The DOF is aware of the demand. We are limited in our ability to meet this demand by our annual allowable cut. We do not have the volume on State land to meet these yearly requirements.
AFA	When looked at from a geographic point of view, it appears that multiple areas could be combined to offer larger sales that would provide a measure of economic efficiency for both DOF and the purchaser of the sale. For DOF, the efficiency would include reducing the number of and time spent on public process for the same volume of timber.	Noted. No change required.
ARD	Based on actual utilization data, the Division of Forestry’s management intent for the sales program and the Prince of Wales Island Area Plan’s Forestry goal, the maximum amount of timber the Division of Forestry should evaluate for a FYSTS should not exceed 2,000 MBF	The DOF has sold all timber it has marketed in the Southeast Area in the last ten years. Operators have requested a variety of sale sizes.



Commenter	Comment	Response
ARD	The Preliminary FYFST needs to be withdrawn, and the Division of Forestry needs to reconsider its timber program in the area covered before it recommences planning.	Timber harvest planning is a multistep process involving a variety of agencies and stakeholders. The FYSTS is more akin to scoping; it is not a decision to proceed with a sale. No change required.
	Water Quality/ Fisheries	
ADFG-Craig	There are no anadromous streams located within the North Hollis harvest area. ADF&G recommends split yarding on water quality streams to minimize slash input.	The DOF has included that best management practice in the timber sale contract.
ADFG-Douglas	We also recommend implementing a partial harvest retention zone out to 300 feet along the main stem of the Patterson River; a wide water body prone to bank erosion and avulsion.	The DOF will work as usual with ADFG during harvest design to protect values at risk.
ADFG-Douglas	We completed 2017 field work associated with the Alaska Sustainable Salmon Fund project cataloging anadromous water bodies on southeast Alaska timber lands and will provide you GIS files by email shortly. Please use this information to check and update sale area maps to reflect the most current survey work.	The DOF looks forward to acquiring and applying the data.
ADFG-Craig(Duplicate)	The FLUPs should clearly identify what timber harvest and road construction activities would occur within 300' of anadromous and high-value resident fish water bodies, and how allowances will be made for important fish and wildlife habitat within this zone. We appreciate notification of multiple sales that may be close enough to function as units of one sale. However, we would appreciate the opportunity to review the location of sales that are less than 10 acres in size, to identify any wildlife concerns such as dens or nesting areas.	Noted.
ADFG-Craig	Although the only streams depicted on the FYSTS maps are cataloged anadromous streams and "streams", we understand that during the FLUP process, through conducting site inspections, the "streams" category will be delineated further into water quality, resident, high-value resident, and anadromous fish categories as seen fit.	This is standard practice.
ADFG-Craig	The crossing and road located near the outlet of Bostwick Lake should be located/constructed as far away and uphill from the lake as possible to minimize impacts to the lake and maintain a wind-firm buffer along the lake. Both crossings of Bostwick Creek will require Fish Habitat permits.	Noted.
ADFG-Craig	North Thorne Bay Area : A site inspection should be completed prior to harvest/road construction to verify the presence or absence of anadromous fish	Noted.
ADFG-Craig	Vallenar Bay Area: All anadromous fish habitat has been identified within the sale area.	The DOF appreciates the ADFG effort in the area. We have found several additional streams that we will represent in the FLUP.
ADFG-Craig	Heceta Area: ADF&G recommends accessing the western portion of the unit from the existing USFS road to the west of cataloged stream 103-90-10470 to avoid crossing the stream a second or third time. A Fish Habitat permit(s) will be required for any road crossings of cataloged stream 103-90-10470.	Noted.



Commenter	Comment	Response
ADFG-Craig	Kosciusko Island Area: A riparian retention zone of greater than 100 feet is recommended along both sides of Survey Creek to maintain important fish and wildlife habitat.	Noted.
ADFG-Craig(Duplicate)	El Capitan Passage Area: Cataloged stream 105-42-10110, located in the northeast corner of section 13, is missing from the area map and needs to be considered when planning timber harvest operations.	Noted. Added to the map.
ADFG-Craig	El Capitan Passage Area: Although not included in the Anadromous Waters Catalog, Twin Island Lake is an anadromous waterbody directly tributary to cataloged stream 106-30-10800 and is important for coho rearing. A no harvest retention area of at least 300 feet should be maintained around Twin Island Lake to maintain important fish and wildlife habitat, especially along the southern side of the lake where salmonid rearing habitat extends into the sedge wetlands.	Noted.
ADFG-Craig	Whale Pass Area: There is a water quality stream shown on the Area map that flows along the east side of the eastern portion of the Area and is tributary to cataloged waterbody 106-30-10820-2003-3009-0010. ADF&G recommends that this water quality stream be inspected prior to harvest layout to determine if the stream provides anadromous fish habitat.	Noted.
ADFG-Craig	Control Lake Area: In addition, two uncatalogued anadromous tributaries to stream 103-60-10290 are located adjacent to (northern area) and through (southern area) the two harvest areas located in the center of Section 13. The southern tributary will require a road stream crossing to access the northern half of this area. Fish passage and a Fish Habitat permit will be required for the crossing.	Noted.
ADFG-Craig	Naukati Area: The Area is broken into three harvest areas. The area east of the mouth of Yatuk Creek (Sec. 16) will require a minimum 100-foot retention area along the Yatuk Creek estuary to the west and along cataloged stream 103-90-10260 to the east. The harvest area located in Section 7 lies adjacent to cataloged stream 103-90-10140-2004-0010-3011 and a small portion of cataloged waterbody (lake) 103- 90-10140-2004-0010. A minimum no harvest retention area of 100 feet will be required along these water bodies. ADF&G has no concerns with the harvest area in Section 21 in the southern portion of the Area.	Noted.
ADFG-Craig	Port Delores: There are five cataloged anadromous streams located within or adjacent to the Port Delores Area (103- 50-10620, 103-50-10610, 103-50-10600, 103-50-10600-2006, and 103-50-10624). These streams have been found to be important for the spawning, rearing, and migration of pink, chum, and coho salmon. All five streams will require 100-foot riparian retention areas. In addition, road crossings of streams 103-50-10620, 103-50-10610, and 103-50-10600 are proposed. Fish Habitat permits will be required for the stream crossings. Crossing structures should be designed to match the natural stream gradient and shall be designed to allow efficient fish passage. The area map shows two water quality streams located in the eastern portion of Section 27. ADF&G recommends that inspections be conducted to determine the presence or absence of anadromous fish	Noted. The DOF will include the ADFG in the refinement of the design.

Commenter	Comment	Response
	in these streams. ADF&G recommends changing the road location in the eastern portion of section 34 in order avoid running the road parallel to the stream to not travel parallel to cataloged stream 103-50-10600.	
ADFG-Craig	Kitkun Bay Area: There are four cataloged anadromous streams (102-40-10130, 102-40-10110, 102-40-10090, and 102- 40-10280) located within the harvest Area. No-harvest retention areas of at least 100 feet should be placed on all four streams. In addition, estuarian retention areas may be required at the mouth of each of the streams. ADF&G recommends that site inspections be conducted near cataloged stream 102-40- 10280, located in the western portion of the Area, to verify the presence/absence of anadromous fish in the large lake and its tributaries in Section 16. Although there are no planned road/stream crossings within the harvest area, there are two existing anadromous stream crossings located on the USFS 2160 Road. Will the DOF be responsible for any maintenance of these crossing structures should they be found to be impeding fish passage? Consider protection of the known eagle nest located in the central portion of area (Sec. 14)	Noted, the DOF will deal with the various subjects as required by the Alaska Forest Practices Act and regulations and include ADFG in the planning.
ADFG-Craig	George Inlet Area: Cataloged stream and lake system 101-45-10450, 101-45-10450-0010, 101-45-10450-0020, important for the spawning, rearing, and migration of coho and pink salmon, is located through the center of the harvest area. ADF&G recommends a riparian retention area of greater than 100 feet be implemented along the anadromous drainage to ensure a windfirm buffer. Access to the harvest area would be via the Alaska Department of Transportation's Leask Lake to Shelter Cove Road and existing USFS roads	Noted.
ADFG-Craig	Little Coal Bay Area: Cataloged streams 102-60-10640 and 102-60-10620 flow through the west and east portions of the Area respectively. There appear to be several smaller streams located within the harvest area as well. Site inspections of these streams should be conducted to verify the presence or absence of any anadromous fish.	Noted.
	Wildlife	
ARD	Gravina: Concern for low deer numbers on Gravina.	The DOF has consulted the ADFG regarding this subject as it has developed its plans for timber sales on Gravina Island. The DOF will continue to dialog and provide due deference to ADFG regarding habitat.
ADFG-Douglas	As part of a cooperative project in Thomas Bay, the Alaska Departments of Fish and Game and Natural Resources, and the US Forest Service, conducted over 300 acres of thinning in dense second growth to enhance moose habitat in the late 1990s. We recognize clear cuts can provide year-round foraging opportunities for moose until the stem exclusion phase. Deer, however, benefit much less as they are unable to navigate accumulating snow. Follow-up visits to the thinned plots suggest deer and moose are using the habitat which provides some snow interception and understory growth. Therefore, we recommend managing the Thomas Bay area as a mosaic of commercially thinned stands and clear cuts to	Noted. The DOF will coordinate with ADFG for operations in the area.

Commenter	Comment	Response
	benefit all wildlife species while providing timber for sale to the industry.	
ADFG-Craig	The FLUPs should clearly identify what timber harvest and road construction activities would occur within 300' of anadromous and high-value resident fish water bodies, and how allowances will be made for important fish and wildlife habitat within this zone. We appreciate notification of multiple sales that may be close enough to function as units of one sale. However, we would appreciate the opportunity to review the location of sales that are less than 10 acres in size, to identify any wildlife concerns such as dens or nesting areas.	The DOF will coordinate and provide due deference to ADFG on timber sales adjacent to anadromous waterbodies to provide allowances for fish and wildlife per the Alaska Forest Practices Act, Area Plans and the Southeast State Forest Management Plan.  The DOF will make the ADFG aware of smaller timber sale actions and conditions that it observes that may indicate concentrated or important wildlife use.
ADFG-Craig	Consider protection of several known eagle nest trees along the eastern shore of Vallenar Bay.	The DOF is required by Alaska Forest Resources and Practices Regulation (11 AAC 95.340) to retain a buffer, where feasible, of not less than 330 feet in radius around each bald eagle nesting tree.
ADFG-Craig	Port Delores: Consider protection for 3 known eagle nest trees located in the proposed harvest area.	
ADFG-Craig	Kitkun Bay Area: Consider protection of the known eagle nest located in the central portion of area (Sec. 14)	
	<b>Cultural Resources</b>	
DNR-OHA	Bostwick Area: There are no reported cultural resource sites known within the proposed timber sale and road areas identified. An archaeological survey for the identified projects was completed in 2013, with negative results. We are unlikely to recommend survey unless further information regarding cultural resource sites becomes available.	Comment noted, no change required.
DNR-OHA	Control Lake Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. We are unlikely to recommend survey unless further information regarding cultural resource sites becomes available.	Comment noted, no change required.
DNR-OHA	Earl West Cove Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. We are unlikely to recommend survey unless further information regarding cultural resource sites becomes available.	Comment noted, no change required.
DNR-OHA	El Capitan Passage Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. There are multiple reported cultural resource sites known within the areas identified for selective harvest. We may recommend archaeological survey dependent on the details of the proposed activity. We encourage early consultation with our office by both DOF and DMLW for this area as plans develop.	Comment noted, no change required.
DNR-OHA	George Inlet Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. There are reported sites in close proximity. We may recommend archaeological survey in the proposed harvest areas in Section(s) 29 and 32 (T. 73 S, R. 29 E., Copper River Meridian)	Comment noted, no change required.

Commenter	Comment	Response
	dependent on the details of the proposed activity. We encourage early consultation with our office regarding these proposed sale areas as plans for this area develop.	
DNR-OHA	Heceta Island Area: There are reported cultural resource sites within the identified 2018-2022 proposed harvest areas. An archaeological survey was conducted within portions of the project areas to assist DOF with avoidance and minimization of effects to these sites. Provided DOF follows the management recommendations in the archaeological survey report for Unit 2--and our letter dated 1/25/2018-- no adverse effects to significant cultural resources are anticipated from the proposed activities in Unit 2. Unit 1, in Section 21 T. 70 S, R. 78 E, Copper River Meridian was archaeologically surveyed, however, it appears that the project area has been expanded since that survey was performed. There are two known sites reported within the expanded harvest area. We may recommend survey in the western half of that proposed harvest area dependent on whether avoidance of the known sites is feasible, and the details of the proposed activity. We encourage early consultation with our office as plans for this area develop, and reference of the associated archaeological survey report for Units 1 and 2 (Cultural Resources Investigations of Two Heceta Island Timber Sales, Southeast Alaska, for the State Division of Forestry by the Office of History and Archaeology).	The map has been updated to reflect the unit reviewed in the field with OHA. The DOF has corrected the error in representation.
DNR-OHA	Kitkun Bay Area: There are two reported cultural resource sites within the identified 2018-2022 proposed harvest areas, both have been previously determined to be not eligible (not significant) for the National Register of Historic Places. However, their presence does indicate a higher potential for encountering previously unidentified sites, and we are likely to recommend survey in this area dependent on the details of the proposed activity. We encourage early consultation with our office for this area as plans develop.	Comment noted, no change required.
DNR-OHA	Kosciusko Island Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. An archaeological survey has been conducted within this area. We are unlikely to recommend survey unless further information regarding cultural resource sites becomes available.	Comment noted, no change required.
DNR-OHA	Little Coal Bay Area: There are no reported cultural resources within the identified 2018-2022 proposed harvest areas. Provided the identified setbacks from waterbodies are maintained, and no further information regarding cultural resource sites becomes available, we are unlikely to recommend survey.	Comment noted, no change required.
DNR-OHA	Mitkof Island Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. We are unlikely to recommend survey unless further information regarding cultural resource sites becomes available.	Comment noted, no change required.
DNR-OHA	Naukati Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. We are unlikely to recommend survey unless	Comment noted, no change required.

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	further information regarding cultural resource sites becomes available.	
DNR-OHA	North Hollis Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. This area has been archaeologically surveyed. We are unlikely to recommend survey unless further information regarding cultural resource sites becomes available.	Comment noted, no change required.
DNR-OHA	North Thorne Bay Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. There are three (3) reported cultural resource sites within the identified proposed settlement harvest areas in Section(s) 34 and 35 of T. 71 S, R. 84 E, Copper River Meridian. We are likely to recommend archaeological survey in the above sections for proposed settlement harvest dependent on whether avoidance of the known sites is feasible, and the details of the proposed activity. We encourage early consultation with our office as plans for this area develop.	Comment noted, no change required.
DNR-OHA	Port Delores Area: There are three (3) reported cultural resource sites within the identified 2018-2022 proposed harvest areas. We are likely to recommend archaeological survey in this area dependent on specifics of the proposed activity. We encourage early consultation with our office for this area as plans develop.	Comment noted, no change required.
DNR-OHA	Thomas Bay Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. We are unlikely to recommend survey unless further information regarding cultural resource sites becomes available.	Comment noted, no change required.
DNR-OHA	Vallenar Bay Area: There are no reported cultural resource sites within the identified 2018-2022 proposed harvest areas. An archaeological survey has been conducted in the area. We are unlikely to recommend survey unless further information regarding cultural resource sites becomes available.	Comment noted, no change required.
DNR-OHA	Whale Pass Area: There is one reported cultural resource site within the identified 2018-2022 proposed harvest areas. We are likely to recommend an archaeological survey, specifically in Section 23, T. 66 S, R. 79 E, Copper River Meridian, dependent on whether avoidance of the known site is feasible and the details of the proposed activity. We encourage early consultation with our office as plans for this area develop.	Comment noted, no change required.
	General	
AFA	AFA suggests that the DOF combine the following proposed areas in order to produce larger sales: Bostwick and Vallenar; North Thorne, El Capitan, Control Lake, Naukati and Port Delores; Heceta and Kosciusko; Earl West, Mitkof Island and Thomas Bay.	The DOF will consider merging areas together at the time of sale if market conditions allow. The market in general has not had enough timber in the collective pipeline to consider this kind of flexibility with State timber; timber has generally been marketed as soon as it has cleared the Best Interest Finding and Forest Land Use Plan phases. The DOF recognizes the economies of scale that can be achieved when projects increase in size. This is more pronounced as projects are remote and removed from an existing operating area.

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		Given the requirements on State land management, it is not necessarily easier to bundle separate areas into one timber sale process.
AFA	There are numerous LTFs, rafting grounds and log storage areas that will be used in conjunction with the harvest of timber from the 17 proposed areas included in the DFYSTS; does DOF have all of the necessary permits in place for the use of all those facilities or will the timber sale purchaser need to obtain the permits?	LTF's are fundamental to the movement of timber in Southeast Alaska. The associated rafting grounds and log storage areas are likewise important depending on the size of the timber sale. The DOF will coordinate the authorization required to use facilities needed for access to State timber. The subject is complicated by the history of a site, current activity and the ownership of the land and tidelands.
AFA	Some of the areas will require the purchaser to cross lands owned or managed by other entities; does DOF have the necessary agreements in place so that those roads and facilities are available for purchaser use or will the purchaser have to obtain permission to use such infrastructure? If use agreements and permits are in place for some areas but not all; provide such information with the FYSTS.	The DOF has a reciprocal use agreement in place covering State Forest Lands, Mental Health Trust Land and the University of Alaska Trust Lands. The DOF has a site-specific agreement in place with the USFS on Kosciusko Island and Wrangell Island. In the absence of an agreement between land managers, the timber purchaser is required by the timber sale contract to negotiate and meet the expectations of the land manager for use of the infrastructure.
ARD	The Division of Forestry needs to compile and review updated information about local employment and then reconsider the scheduled timber sale volume.	The DOF is not required by statute to compile local employment data as part of its development of the FYSTS.
ARD	The Division of Forestry should provide an estimate of the total costs of FYSTS implementation and downscale the proposed sale program.	The FYSTS is a scoping document that provides a "pool" of possible timber sale areas for the next five years. The FYSTS is not a budget level document. The actions represented by a FYSTS change over time as resources are evaluated and options considered.
ARD	The Division of Forestry needs to reconsider the scale of the program, and particularly evaluate ways to reduce administrative costs by reducing the Annual Allowable Cut.	The DOF works with the Legislature and the Governor to determine the appropriate scale of its forest management program of which the sale of State timber is only part.
ARD	Ketchikan, Petersburg and Wrangell Area sales: the Division of Forestry should remove proposed sales from the FYSTS to provide for multiple use management and community needs.	Timber sales are a method and means for the management of forest resources. The DOF uses area plans, forest plans and public outreach during planning to provide for multiple use management. The process provides many opportunities for community needs to be heard and incorporated.
ARD	Defenders submits that the Division of Forestry needs to re-evaluate other socio-economic and ecological information showing that logging these parcels fails to meet other Forest Resources and Practice Act standards and Central/Southern Southeast Area Plan guidelines.	The DOF evaluates the likelihood of successful Forest Resources and Practices Act implementation during the development of the Best Interest Finding and the Forest Land Use Plan. In the timber sale contract, the DOF requires standards of the Act to be a condition of operation in the sale area. Depending on the applicability, all timber sales described in this FYSTS are required to follow the guidelines of a land management plan.

Commenter	Comment	Response
KGB	The Ketchikan Gateway Borough encourages the State of Alaska to offer timber sales for commercial purposes, and specifically urges the Division of Forestry to adopt the Division of Forestry 2018-2022 Five-Year Schedule of Timber Sales for the Southern Southeast Area (Southern Southeast Area Plan) and begin offering the planned timber sales as soon as possible. To that end, the Borough encourages the Division of Forestry to ensure the staffing and budgetary resources necessary for the full and timely implementation of this and future plans is available.	Noted, no change required.
ADFG-Craig	The color identifiers for "General Use Lands" and "Mental Health Lands" are difficult to differentiate on the map and should be changed.	Noted, the final version will seek to remedy the difficulty.
	Site Specific	
AFA	Bostwick Area: The narrative states that the sale may involve helicopter harvest, will the areas outlined on the map w/o proposed roads be harvested by helicopter? The map shows no selective harvest areas, if helicopter harvest occurs, will the helicopter harvest areas be clearcut?	The areas represented on the map are locations of potentially merchantable timber. The practicality of road access and the logging system has not been determined. Given the unit size, disbursement and the timber types, the proposed use of a helicopter might be appropriate. The economics of using such an approach will be considered during the development of the BIF.
ARD	Bostwick: Concern for proper protection of fisheries and estuarine impact on the Bostwick drainage.	The importance of the Bostwick drainage is well documented. The DOF will provide due deference to ADFG during sale planning and design for the protection of the fish and wildlife resources.
ARD	Bostwick: Concern for wildlife movement at Bostwick.	Same as above.
ARD	Bostwick: Concern for community harvest capability.	The DOF is aware of the traditional use of the Bostwick drainage and in particular the lower reaches of the drainage accessed from saltwater on the south side of the island. The land ownership and the area proposed for potential harvest is significantly removed from the traditional tidewater use area. The DOF will work with ADFG to discern the habitat importance and community use of the area.
ARD	Bostwick: Concern that recreation use will not be taken into account at Bostwick.	Recreational use in the area has traditionally been dispersed. Prior to the development of the road by the DOF in 2008, the use was very limited. Since 2008, the use has been low key and has been observed to be associated with firewood gathering, hunting, recreational fishing and camping.
ADFG-Craig	Bostwick Lake and Creek, ADF&G streams 101-27-10360-0020 and 101-27-10360 cataloged for coho, chum, and pink salmon, and steelhead are located adjacent to portions of the harvest area with Bostwick Creek flowing through the middle of the northern portion of the harvest area. How will the area on the east side of Bostwick Creek be accessed in this area?	The DOF has budgeted a modular bridge for crossing Bostwick Creek.
AFA	Little Coal Bay: The Legend on the map does not include an explanation for the green colored area along the coast; please expand the Legend to provide that information.	Noted, the map has been updated to better represent the situation.

Commenter	Comment	Response
AFA	Little Coal Bay: The map does differentiate between the proposed harvest by helicopter and conventional shovel logging or by clear-cut and selective cut harvest methods; please define those areas on the map and within the narrative provide a breakdown of acres and volumes by logging system and harvest method. Are there proposed roads that will be needed to facilitate harvest of the area? If so, please show the proposed locations and provide an estimate of amount of roads to be constructed. The total estimated volume to be harvested from the area is extremely low; is this due to the proposed selective harvest or a result of harvesting low volume per acre timber stands? As currently depicted on the map and described within the narrative; it is highly unlikely that this proposed area will produce an economical timber sale.	The Little Coal Bay parcel has scattered patches of timber. The parcel has been observed from the air on numerous occasions incidental to travel to other locations on Prince of Wales Island. The DOF identified the area in the FYSTS as a potential source of timber that might be associated with development of a subdivision in the area. Harvest appears to be possible in several areas that may be developed for a residential subdivision using shovel logging off existing or proposed roads. Additional volume could be logged in other areas using a helicopter. Economic operation based the merits of the timber alone is unlikely.
ADFG-Craig	Port Delores: Consider protection for 3 known eagle nest trees located in the proposed harvest area.	The DOF is required by Alaska Forest Resources and Practices Regulation (11 AAC 95.340) to retain a buffer, where feasible, of not less than 330 feet in radius around each bald eagle nesting tree.
AFA	Port Delores: Please show the areas of old growth and young growth being proposed for harvest.	The DOF has portrayed the extent of its knowledge of the area. Several non-timber resources have been identified by agencies to date. A more refined representation of potentially operable timber types will be forthcoming as field reconnaissance occurs.
ARD	Wrangell/ Earl West: Concern for fish habitat.	Most of the fish habitat has been identified in the area. The methodology to identify streams that could hold previously unknown fish habitat is an ongoing and well-established process. The DOF and ADFG will work closely to define the extent and value of habitat to determine the appropriateness of timber sale activity.
ARD	Wrangell/ Earl West: Concern for wildlife habitat.	The DOF will work with ADFG to identify important wildlife habitat and appropriate protection.
ARD	Wrangell/ Earl West: concern for water quality in the area affecting the Southern Southeast Regional Aquaculture Association hatchery remote release site.	The DOF will work with ADFG and ADEC as well as the Southern Southeast Regional Aquaculture Association to maintain existing water quality.
AFA	El Capitan Passage: The estimated volume (17 MMBF) to be removed from the estimated 1,700 acres of harvest produces an average volume per acre of 10 MBF. At such a low volume per acre can these timber stands produce an economical timber sale?	The volumes in the El Capitan area are based on aerial photos, the vegetation type models developed by the USFS and limited observation. Timber types and infrastructure remain to be confirmed.
AFA	El Capitan: No proposed roads are shown within sections 24 and 25 of T66S, R78E; however, the map shows proposed harvest during the 2018-2022 period. How will this harvest occur?	
AFA	El Capitan: The 2 parcels of SESF in the El Capitan area total 2131 acres. The narrative in the DFYSTS states that 1700 acres of old growth harvest will occur; will all of this harvest (1700 acres) occur within the 2 state forest parcels? The map for the area within the DFYSTS shows selective timber harvest occurring on approximately 1900 additional acres outside of the SESF. The map shows the	The harvest in Recreation and Subdivision classified lands will require consultation with DMLW and Division of Parks and Recreation who have the authority for the management of the land. While these agencies have initially been receptive to some development, they have other priorities than the harvest of timber.



Commenter	Comment	Response
	majority of this harvest occurring on lands designated Recreation. Review of the Prince of Wales Island Area Plan shows this area to have multiple use designations and that timber harvest with restrictions is an allowed use. Should the map for the area outside of the SESF show the area as proposed settlement harvest vs. proposed selective harvest? The narrative mentions harvest within Settlement lands but does not provide an estimate of acres and volume that would be harvest from the area. If the area outside the SESF parcels will be selectively harvested then what harvest method will be used, conventional or helicopter?	The DOF anticipates that the process of developing timber from these areas will be time intensive and perhaps capital intensive due to the need to pursue permitting and the lack of agency familiarity with timber development. The method of harvest will be driven by the end state that the DOF and the land manger can agree is appropriate. The economics of covering access and operating costs on these lands is not clear. The DOF will not engage in the removal of timber on these lands without a clear understanding of the costs and desired outcomes of the managing agency.
AFA	El Capitan Passage: The maps of the 2 El Capitan parcels included in the SESF Management Plan show portions of section 12, T66S, R78E under federal ownership; the map for the DFYSTS shows the land being owned by the State of Alaska, which set of maps is correct?	Noted, the maps have been updated. The FYSTS maps represent the approximate land status.
ADFG-Craig(Duplicate)	El Capitan Passage Area: Cataloged stream 105-42-10110, located in the northeast comer of section 13, is missing from the area map and needs to be considered when planning timber harvest operations.	Noted, the maps have been updated.
DMLW-Baker	El Capitan Passage: This is a current funded project (NE1/4 Section 11, T66S, R78E, CRM), Preliminary Decision Public Notice should be out before the end of March, 18. Potentially parcels could be offered in the 2020 Land Sale Auction Brochure. This area will not be available for harvest. The remaining area is available for timber harvest. (see attached map)	Noted, the maps have been updated
AFA	George Inlet: The narrative mentions harvest within Settlement lands in the vicinity of Leask Cove; please show on the area map the location of that proposed harvest and within the narrative provide estimates of acres and volume from that proposed harvest. The Legend for the map does not include a Settlement land designation. How will the proposed harvest areas in sections 28, 29, 32 and 33 T73S, R92E be accessed? The map shows no proposed roads, please show the proposed road system and provide an estimate of mileage. If no roads are planned for those areas please explain how those parcels will be harvested?	There are numerous settlement lands in George Inlet. The DOF anticipates some harvest associated with future development of subdivisions in the area. The DOF has not developed a access plan for the State Forest and General Use area; the amount of timber proposed is an estimate. The DOF will move towards a better understanding of area as access improves with the completion of the Shelter Cove Road.
AFA	George Inlet: The map has areas colored green with no designation within the Legend for that color; are those areas Settlement lands?	Settlement Classification is now represented in the legend on the maps.
ADFG-Craig	George Inlet Area: The Area description mentions the need for an additional 1.8 miles of new spur road however, this new road is not shown on the Area map.	The mileage is estimated. The location has not been identified due to lack of access to the area and the unfinished ADOT road work in the area.
AFA	Heceta: The map shows 5 different roads accessing the Heceta West unit; will all five roads be needed for the unit? Two of the five roads cross national forest lands; will a permit(s) be required to construct road across the national forest? If needed will the permits be obtained by DOF or the responsibility of the purchaser?	Proposed access to the area has been influenced by several historic sites in the area, anadromous habitat, land ownership and land management requirements. The multiple alignments represent different options for access. The DOF has worked to avoid different resources and has requested permission to access State land through federal land as part of this process. The USFS to date has not

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		indicated perspective of the routes on their land.
ADFG-Craig	Kitkun Bay Area: Consider protection of the known eagle nest located in the central portion of area (Sec. 14)	The DOF is required by Alaska Forest Resources and Practices Regulation (11 AAC 95.340) to retain a buffer, where feasible, of not less than 330 feet in radius around each bald eagle nesting tree.
AFA	Kitkun Bay: The narrative for the area mentions selective harvest occurring during the next 5 years; the map however does not show the area(s) of selective harvest. The map for the area shows proposed roads; please provide the amount of proposed roads in the narrative. Also provide estimates of acres and volume by harvest method.	The selective harvest noted in the description is associated with the west side of Kitkun Bay. The terrain and timber do not lend themselves to road access or ground based logging, therefore the concept presented of using a helicopter. The units on the east side conceptually appear to be accessible to the existing road system with additional spurs. Adjacent operations conducted by the DOF in the area in the late 90's were a combination of shovel and high lead logging.
AFA	Kosciusko: The narrative states that the "area may be sold in one or more sales over several years"; if this area will be sold over several years; then the acres and volume to be sold over several years should be shown within the FYSTS by the year(s) that the sales will occur.	The DOF has considered several possible sale configurations. Because of the mix of timber ages, markets and purchasers in the area, the DOF has represented the overall configuration.
ADFG-Craig	Kosciusko Island Area: Most of the roads in the harvest area have already been constructed. Although the FYSTS does show some new road construction (in the eastern portion of the harvest area), the map does not depict the 5.0 miles stated in the Area description.	The draft map line type for some of the proposed road at this location was mistakenly portrayed as existing road. The subject roads are now represented as proposed on the map.
AFA	Mitkof Island: What sector of the timber industry does DOF envision purchasing timber from this area? As portrayed in this DFYSTS, the proposed sale or sales do not provide enough timber volume for an operator located off of Mitkof Island to realize a profit from purchasing the timber sale. AFA suggests including all available timber volume managed by DOF located on Mitkof Island.	Past State timber sale actions in Petersburg area have been associated with small timber purchasers. This area has been represented in the past as an area that could be developed for several sales. The DOF will consider expanding plans or working with other land owners on Mitkof.
ARD	Petersburg: the sale would occur on moderately steep sloping terrain adjacent to residential properties in a community	The sites identified have relief and distance from residential areas. The DOF considers the site to be suitable for consideration as a timber sale. The DOF will assess conditions on a site-specific basis in light of the Alaska Forest Resources and Practices Act, the Southeast State Forest Plan and other appropriate constraints.
ADFG-Douglas	With regard to the proposed Mitkof Island sale, there is a confirmed goshawk nest site in the NE ¼ of section 9 within a proposed sale unit.	The DOF will work with ADFG on appropriate management actions around the nest.
Petersburg Borough Assembly (Duplicate)	Mitkof Island and Thomas Bay: The borough made these selections based on the current condition of these lands and believes the state intended for the lands to be conveyed to municipalities in order to promote local self-reliance and local control. The DNR's proposal undermines both of those objectives and moreover sets the stage to devalue future borough assets. We request all VUU land selected by the borough be removed from consideration in the state's schedule of timber sales. See attached maps of borough selections submitted to DNR.	The FYSTS is a scoping document. The DOF manages State Forest land; State Forest land is not eligible for conveyance to the Borough. The DOF will work with the community of Petersburg and the municipal selection adjudication staff at DNR to understand the requirements of the process for the other lands selected and their appropriate interim management. The DOF will defer planning and action on the two noted Petersburg sales until the municipal

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Petersburg Chamber of Commerce (Duplicate)	Mitkof Island and Thomas Bay: The borough made these selections based on the current condition of these lands and believes the state intended for the lands to be conveyed to municipalities in order to promote local self-reliance and local control. DNR's proposal undermines both of those objectives and moreover sets the stage to devalue future borough assets. We request all VUU land selected by the borough be removed from consideration in the state's schedule of timber sales.	conveyance process has reached a more definitive stage.
Petersburg Economic Development Council (Duplicate)	Mitkof Island and Thomas Bay: The borough made these selections based on the current condition of these lands and believes the state intended for the lands to be conveyed to municipalities in order to promote local self-reliance and local control. The DNR's proposal undermines both of those objectives and moreover sets the stage to devalue future borough assets. We request all VUU land selected by the borough be removed from consideration in the state's schedule of timber sales. See attached maps of borough selections submitted to DNR.	
Representative Jonathan Kreiss-Tomkins (Duplicate)	Mitkof Island and Thomas Bay: Please consider removing the VUU land selected by Petersburg Borough from the Five Year Schedule of Timber Sales and allowing the municipal land selection adjudication to proceed.	
AFA	Naukati: Please show on the map the area that DMLW is proposing for a subdivision that will be available for harvest and within the narrative provide information on the number of acres involved, an estimate of volume generated and the amount of road needed if a sale occurs as proposed.	The harvest planning of timber associated with subdivision activity has not been refined to provide the level of detail requested. The FYSTS represents the extent of DOF knowledge of DNR plans.
DMLW-Baker	Naukati Area: The 2 DMLW project areas mentioned in the harvest plan, Kaikli Cove and Little Naukati Bay, should be shown on the map as "proposed Settlement Harvest". (see attached map)	The maps have been updated.
ADFG-Douglas	As part of a cooperative project in Thomas Bay, the Alaska Departments of Fish and Game and Natural Resources, and the US Forest Service, conducted over 300 acres of thinning in dense second growth to enhance moose habitat in the late 1990s. We recognize clear cuts can provide year-round foraging opportunities for moose until the stem exclusion phase. Deer, however, benefit much less as they are unable to navigate accumulating snow. Follow-up visits to the thinned plots suggest deer and moose are using the habitat which provides some snow interception and understory growth. Therefore, we recommend managing the Thomas Bay area as a mosaic of commercially thinned stands and clear cuts to benefit all wildlife species while providing timber for sale to the industry.	The DOF will work with the ADFG if plans progress past this stage.
AFA	Thomas Bay: To date, conveyance to the Petersburg Borough has not been completed; will these lands still be available in 2022 for a DOF timber sale?	This remains to be determined. Any operations in the area will require concurrence with the DMLW that the action is appropriate.
AFA	Thomas Bay: The map also shows 2 log transfer facilities (LTFs); is the DOF planning on using both for the proposed sales?	The use of one or both LTFs is tributary to the design process of the timber sale. We have represented the possible use of both LTFs. The use of only one LTF is related to the feasibility of crossing Patterson Creek as well as LTF permitting requirements.

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AFA	Thomas Bay: Currently there are no bridges in place that provide access across Patterson Creek and its tributaries; will the DOF construct those bridges prior to offering the sale, provide bridges for the timber sale purchaser to install or plan for the timber sale purchaser to buy and install the bridges?	This has not been determined.
AFA	Thomas Bay: The average volume per acre for the proposed young growth harvest is 10 mbf. AFA doubts that the harvest of young growth stands averaging 10 mbf/acre is economical, especially in a remote location such as Thomas Bay.	Due to the timber age and the previous management intent of the area by both ADFG and DMLW, the DOF applied a low recovery rate over the operating area. Harvest in the area would more than likely target areas that offer economically operable timber and leave less developed stands to grow and provide other forest benefits. This should improve some aspects of the economics; it remains to be seen whether the timber is at the point that it can pay for the costs of operating in the area.
AFA	North Thorne Bay: Will the 3 timber stands within the SESF be combined into a single sale or sold as multiple sales?	This has not been determined.
AFA	North Thorne Bay: If the Settlement lands are harvested as proposed will they be included with the timber stands located in the SESF as a single sale or sold separately?	This has not been determined.
DMLW-Baker	North Thorne Bay Area: The map of Thorne Bay area should include the NE1/4 Section 32 and the W1/2NW1/4 Section 33, T71S, R84E for proposed Settlement Harvest, Section 4, T72S, R84E is already indicated proposed Settlement Harvest. (see attached maps)	The DOF will update the maps to reflect the proposed activity area.
ADFG-Craig	Consider protection of several known eagle nest trees along the eastern shore of Vallenar Bay.	The DOF is required by Alaska Forest Resources and Practices Regulation (11 AAC 95.340) to retain a buffer, where feasible, of not less than 330 feet in radius around each bald eagle nesting tree.
AFA	Vallenar: The narrative states that the sale may involve helicopter harvest, will the areas outlined on the map w/o proposed roads be harvested by helicopter? The map shows no selective harvest areas, if helicopter harvest occurs will the helicopter harvest areas be clearcut? Show the location(s) of the young growth stands on the map. Is there a need for additional roads? No proposed roads are shown on the map.	Some of the timber polygons identified in the FYSTS are isolated from the rest of the road system; these areas are candidates for helicopter harvest of timber. The idea of clearcutting for a helicopter does not generally work in old growth stands in SE Alaska. It is likely that some additional spur roads may be needed in the area. The DOF has represented the extent of its planning to date; it expects to finish field work in 2018.
AFA	Whale Pass: The map for the area contains areas with sections 23, 25 and 35 that are colored green and do not have any type of designation within the legend for the map; what is the actual designation for these areas?	The maps have been edited to indicate the classification.
AFA	Whale Pass: The map does not show the area(s) where harvest on Settlement lands might occur; please show these areas on the map and provide information regarding the proposed acreage and volume within the narrative. Neither the map nor the narrative provide information regarding the location, acres and volume of helicopter harvest; again, please provide that information. Since no selective harvest areas are shown on the map; will the areas harvested by helicopter be	The map shows the extent of DOF knowledge regarding the settlement actions. The possibility of helicopter harvest is based on the timber distribution in portions of the tract. The DOF does not plan to clear-cut for helicopter harvest.

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	clear-cut?	
AFA	Whale Pass: AFA request that the timbered areas within section 13, T66S, R79E designated as GU lands be included within the proposed timber sale. Also State owned lands, which are available for timber harvest, in the Exchange Cove area should also be included the FYSTS.	The DOF will look at the possibility of adding the GU land described in a future FYSTS. The land in Exchange Cove has been looked at several times and is currently not marketable.