

State of Alaska  
Department of Natural Resources  
Division of Forestry and Fire Protection  
*Southeast Office*



**Forest Land Use Plan**  
**Whale Pass Timber Sale**  
**SSE-1378 K**

**March 2023**

## Abbreviations

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

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## I. Introduction:

Project File Number: SSE-1378 K

Division of Forestry and Fire Protection Office: Southeast  
Area Forester: Greg Staunton  
Forest Practices Geographic Region (AS 41.17.950): Region I

This Forest Land Use Plan (FLUP) covers forest operations on approximately 292 acres of land from state lands on Prince of Wales (POW) Island, on the east and north sides of the City of Whale Pass. It is intended to provide the best available information regarding the proposed harvest of timber, and management of other non-timber uses in compliance with AS 38.05.112 and AS 41.17.060, and must be adopted by the DNR before the proposed activity can occur..

[ X ] This Adopted Forest Land Use Plan is for timber sale(s) which have been determined to be in the best interest of the state pursuant to AS 38.05.035 (e) and 38.05.945. This FLUP does not determine whether or not to access and sell timber within the timber sale area, nor the method of sale. Those decisions have been made previously in the May 13, 2022 Best Interest Finding and are not appealable under this FLUP.

The Final Best Interest Finding (BIF) and decision for the Whale Pass Timber Sale may be found at: <http://notice.alaska.gov/206692>

*Note: The designation of Unit 2 and 3 was changed in the FLUP from what was labeled in the BIF document to facilitate the calculation of acreage.*

This Forest Land Use Plan was made available for public comments; the review period ended on October 17, 2022. After public and agency review of the draft FLUP, the DOF reviewed comments (see Appendix D), made changes as appropriate and has adopted this FLUP.

The following is a summary of notable changes:

- The partial harvest unit for a wildlife corridor was flagged and the acreage was changed.
- A summary statement was made regarding the effect of the harvest on wildlife.
- The intent of the purchaser's communication and safety plan was outlined.
- A soil stability slope description is added in Section III and added to in Section IV.

This Forest Land Use Plan has been adopted by the Department of Natural Resources. Site specific compliance with the Alaska Forest Resources and Practices Act and the Regulations, as well as the Final Finding for this proposed project are reflected in this Forest Land Use Plan and will be implemented in the Timber Sale Contract.

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

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

Alaska Forest Resources & Practices Act

Prince of Wales Island Area Plan

Southeast State Forest Management Plan

The administrative record for this sale is maintained at the Division of Forestry Southeast Office filed as SSE-1378 K.

**A. Legal description:**

The timber sale area is found within Sections 13, 23, 24, 25, 26, and 27, Township 66 South, Range 79 East, Copper River Meridian (CRM). The sale area is found within the Petersburg A-4 USGS quadrangle. See attached map titled:

Appendix A, SSE-1378 K Whale Pass Timber Sale Harvest Area Maps.

**B. Operational Period:**

Spring 2023 through Fall 2028.

**C. Timber Disposal:**

Timber will be sold and will have a contract administrated by the State.

Timber will be available to the public; permits obtained by the public will be issued by the State.

Other.

**D. Objectives and Summary:**

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

**II. Affected Landowners/Jurisdictions:**

	Access		Representative
Activity on ownership:	Easement	Harvest	Approval

**A. State:**

<input checked="" type="checkbox"/> Southeast State Forest	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/> Other state land managed by DNR (S)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/> University of Alaska	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Mental Health Trust	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> School Trust	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**B. Other Land Ownership:**

Land Owner: \_\_\_\_\_

Land Owner Representative: \_\_\_\_\_

**III. Harvest Methods, Silvicultural Actions, and Management of Non-Timber Resources:**

Forest operations will be designed to:

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

Harvest and Silvicultural Methods:

The silvicultural actions are described in this document, and no prescription was written or is necessary.

A silvicultural prescription has been written and is attached to this document in Appendix B.

**A. Timber Stand Description and History:**

The proposed harvest area has the characteristics of mature old growth. The stands are dominated by a western red cedar stand type. The timber identified is of mixed quality and generally notable in defect due to its slow growth and overall lower site class. The larger and better-quality timber in the area is generally located on the better drained soils. The stand is composed of western red cedar, western hemlock, Sitka spruce and occasional Alaska yellow cedar.

Second growth forests adjacent and to the proposed harvest areas exhibit indications of productive site conditions and are between 15 and 50 years old. The sites identified in the BIF generally are residual stands that did not have the species composition for historical market conditions.

**B. Timber Harvest Activities:**

Timber Harvest Activities are displayed in Table 1.

**Table 1. Timber Harvest Activities**

<b>Unit ID</b>	<b>Setting</b>	<b>Acres</b>	<b>Topography</b>	<b>Silvicultural Action</b>	<b>Logging Method</b>
<b>Unit 1</b>	Shovel	<b>6</b>	Irregular	Clearcut	Shovel Logging
Unit 2	122	2	Irregular	Clearcut	High Lead Cable
Unit 2	133	8	Irregular	Clearcut	High Lead Cable
Unit 2	134	1	Irregular	Clearcut	High Lead Cable
Unit 2	Wildlife	7	Irregular	Partial Cut (50% Basal Area Removal)	Shovel Logging
Unit 2	Shovel	124	Irregular	Clearcut	Shovel Logging
<b>Unit 2</b>	<b>TOTAL</b>	<b>142</b>			
Unit 3	120	2	Irregular	Clearcut	High Lead Cable
Unit 3	125	3	Irregular	Clearcut	High Lead Cable
Unit 3	Shovel	49	Irregular	Clearcut	Shovel Logging
<b>Unit 3</b>	<b>TOTAL</b>	<b>54</b>			
Unit 4	Shovel	33	Irregular	Clearcut	Shovel Logging
Unit 4	141	20	Irregular	Clearcut	High Lead Cable
<b>Unit 4</b>	<b>TOTAL</b>	<b>53</b>			
<b>Unit 5</b>	Shovel	<b>26</b>	Irregular	Clearcut	Shovel Logging
Unit 6A	Shovel	7	Irregular	Clearcut	Shovel Logging
Unit 6B	Shovel	4	Irregular	Clearcut	Shovel Logging
<b>Unit 6</b>	<b>TOTAL</b>	<b>11</b>			
<b>Total of All Units</b>		<b>292</b>			

*Note: Figures rounded to nearest whole numbers. The designation of Unit 2 and 3 was changed in the FLUP from what was labeled in the BIF document to facilitate the calculation of acreage.*



**C. Site Preparation:**

Site preparation will not be necessary. There will be sufficient soil disturbance by logging to forego scarification.

Site preparation will be implemented and described in Table 2:

**Table 2. Site Preparation**

Unit	Acres	Site Preparation Method	Date of Completion

**D. Reforestation:**

Clearcut

Partial Harvest:

Region I: leaving more than 50% live basal area (11 AAC 95(b)(3))

Region II/III: Relying on residual trees to result in a stocking level that meets standards of 11 AAC 95.375 (b 4). Stocking levels will be calculated subject to the methods below:

**Table 3. Stocking Level Requirements**

Average DBH (Diameter at breast height)	Residual Trees (Trees/ acre)	Minimum Stocking Standard (Trees/ acre)	Percent Stocking
≥ 9"		120	%
6" to 8"		170	%
1" to 5"		200	%
Total Residual Stocking			%

Seedlings Required:

Percentage Under stocked = 100 – Total Residual Stocking %

Percentage Under stocked = 100 – \_\_\_\_\_ % = \_\_\_\_\_ %

Seedlings/ Acre Required = Percentage Understocked/100 x 450

Seedlings/ Acre Required = \_\_\_\_\_ % /100 x 450 = \_\_\_\_\_

Natural regeneration

List species: western red-cedar, Sitka spruce, western hemlock, Alaska yellow-cedar

Coppice

List species:
---------------

Artificial regeneration

Seeding-source of seed (general vicinity location of seed source)

Planting: Date of proposed planting: \_\_\_\_\_

Source of seedlings (location of seed source): \_\_\_\_

**E. Slash Abatement:**

- Potential for insect infestations caused by slash accumulations exists. Slash abatement for controlling infestations will be implemented as required by 11AAC 95.370.
- Lop and scatter slash; accumulations will be kept to less than 2 feet in height.
- Slash will be scattered by the operator.  Slash will be disposed of by the State.
- Other - method of slash disposal:  removal off site  crushing or grinding  burning
- Burn permits necessary from DOF and DEC to be acquired.
- The operator will contact the Division of Forestry local area office prior to ignition of debris.

**F. Timber Harvest—Surface Water Protection:**

- There are no streams or lakes abutting or within a harvest unit.
- Known surface waters and protection measures are described in Table 4 below.  
*Locations and types are indicated on the operational map in the Appendices.*

**Table 4. Protection for Known Surface Waters**

Unit	Waterbody Name	AS 41.17.950 Classification	ADF&G AWC #	Required Riparian Protection	Site-specific actions to minimize impacts on waters.
All	All	Non-classified surface waters	none	none	Implement FRPA and Reg.
1/3	West Log Creek	Anadromous	106-30-10798	100 FT	Retain timber per AS 41.17.118(a)1(A) and (B)
2	Snoose Creek	Anadromous	106-30-10770	100 FT	Retain timber per AS 41.17.118(a)1(A) and (B)
None	108/Big Creek	Anadromous	106-30-10800	100 FT	DNR is not harvesting the existing timber between the 3000520 and the stream.
4	Unnamed	Anadromous	106-30-10820-2003-3009	100 FT	Retain timber per AS 41.17.118(a)1(A) and (B)
1-6	Several and Unnamed	Tributary to Anadromous <12%	none	100 FT. Slope Stability Standards	Split yard, site specific crossing approval of DOF.
1-6	Numerous and unnamed	Tributary to Anadromous >12%	none	50 FT. Slope Stability Standards	Split yard, site specific crossing approval of DOF.

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

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

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

- During the timber sale planning process

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

Notes:

1. Non-classified surface waters are subject to applicable Best Management Practices in 11 AAC 95.
2. Surface waters in Units 2 and 3 have previously been used for unauthorized residential water sources associated with the subdivision lots to the east. Some of these residences may withdraw and use surface water from points located on the residential lots. Maintaining existing surface water quality is a required performance goal for all road building and harvest operations.
3. Drainage P913 crosses surface waters tributary to a State granted water right (LAS 10079) south of Unit 2. Timber operations will not draw water or change the drainage pattern in this watershed unless required for wildland fire suppression and other alternatives are not feasible.

**G. Wildlife Habitat:**

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

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

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

Notes:

1. ADFG requested in the BIF a travel corridor for wildlife in Unit 2 that provides visual and overstory cover from the ridge on the north to the Snoose creek area. The partial cut in Unit 2 is designated with this objective. Trees will be marked for removal by DOF prior to harvest.
2. ADFG commented that the removal of the timber will remove important wintering habitat for deer as well as other habitat that may be relied on by other species such as the flying squirrel and Queen Charlotte Goshawk. The legacy timber harvest on adjacent areas in combination with this proposed harvest may impact local wildlife populations. “Due to the remaining important habitat in between the timber sale units and the small size of these timber sale units , ADF&G does not have concerns for impacts on the Unit 2 wildlife populations.”

**H. Cultural and Historical Resource Protection:**

- This project was reviewed by the Office of History and Archeology (OHA).
- No artifacts have been reported within the project area(s).
- Known or likely sites have been identified and a mitigation plan is in place. (Describe the mitigation actions.)

**I. Other Resources Affected by Timber Harvest and Management:**

There are other resources and areas of concern besides surface water, fish habitat, and wildlife habitat that may be affected.

**Table 5. Other Affected Resources/ Areas of Concern.**

Impacted Resource	Reviewing Agency	Impact/ Mitigation Actions
Visual	DOF	Change in landscape appearance /None
Safety	DOF	Public proximity to logging operations/ see notes.

Notes:

1. See BIF for discussion on the visual topic.
2. Safety. The timber purchaser’s logging operations will have a community communication plan approved by the DOF as part of the timber sale contract operating plan. The plan will be kept current reflecting actions and summarize hazards to be avoided by the public. Outreach to the extent feasible will communicate directly with property owners adjacent to active operations. The communication will specifically make owners aware of active cutting, logging operations and blasting within 500 feet of private property. Signs or lookouts will be posted in the proximity of operations as warranted by the activity and terrain.

## I. Soil Stability / Erosion / Mass Wasting

For slopes over 50%, indicators of unstable areas (landslide scars, jack-strawed trees, gullied or dissected slopes, high density of streams or zero-order basins, or evidence of soil creep) are identified.

Unit	Percentage Over 50% Slope	Indicators Observed
1	15	None
2	14	An zero order basin and soil raveling is present in Subunit 134 and outside of the unit on the southwest side.
3	16	Poor drainage, No specific concerns.
4	30	High density of streams, some are incised. Rock boulders on west side.
5	8	None
6A	14	Adjacent slide.
6B	20	Adjacent slide

*Slope percentile was calculated by GIS analysis of the slope digital elevation model produced from the USFS/ADNR 2018 LiDAR set. Information was further verified in the field.*

### Notes:

Maximum percent slopes observed: 70%. Topography is broken in nature; long slope distances above 50% are not present. The majority of terrain identified over 50% is scattered throughout the the units.

### Unit 134:

Indicators of unstable areas were identified in and adjacent to Unit 134 associated with a raveling of the surface soil layer above an impervious clay layer were subsurface water exits the slope and eventually forms the surface drainages. Operations will avoid disturbance of the side slopes to the extent feasible using a high lead cable system with partial suspension of logs.

### Unit 2 (southwest side):

Directional falling and retaining the organic surface during shovel logging is a performance objective along the southwest side of Unit 2. Disturbing existing root systems shall be minimized. Operations shall minimize mechanical disturbance of the organic and clay layer within 100 feet of the dominate slope break on the edge of the unit and at the headwalls of the incised draws.

#### IV. Roads and Crossing Structures:

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

Roads will be designed, constructed, and maintained to prevent significant adverse impacts on water quality and fish habitat (AS 41.17.060(b) (5)), and site productivity (AS 41.17.060(c) (5)). Roads will comply with the best management practices in the Forest Resources and Practices Regulations (11 AAC 95.285 – 95.335). Road class is as defined in the DOF Road Standards unless otherwise noted.

Roads or other means required for the access and removal of this timber from the harvest area(s) or unit(s) are listed in Tables 6A and 6B.

**Table 6A. Road Reconstruction and Use**

Drainage Structure Size (IN)	Map Label	Description of Work or Pt.	Length (FT)
None Required	3000551 (Existing Road)	Reconstruction as needed for access to Unit 6A, 6B	1,831
None Required	3000520	Reconstruction as needed for access to 3000520100	1,150
18 CPP at intersection.	3000520	Construct a new "Y" style junction to the north for the 3000520 Spur and the 3000000 Road. Maintain existing junction facing to the south.	300

Notes:

1. All of Table 6A pertains to existing Roads 3000520 and 3000551. These roads shall be brushed as required to meet DOF road standards, operator visibility and safety needs. Road to be reconstructed and maintained by purchaser prior to hauling operations.
2. The timber purchaser shall provide copies to the DOF of road use authorization agreements prior to operating on existing federally or locally managed roads.

**Table 6B. New Road Construction and Use**

Name	Segment	Start	End	Stations	Road Class	Unit	Max Grade	Construct By	Maintained By
30063000	10	3000 JCT.	Y	4.3	Spur	5	12	Purchaser	Purchaser
30063000	20	Y	End	7.1	Spur	5	12	Purchaser	Purchaser
30063000	Subtotal			<b>11.4</b>					
30063100	10	Y	End	<b>3.8</b>	Spur	5		Purchaser	Purchaser
30064000	10	P1136	P1101	<b>43.9</b>	Spur	4	12	Purchaser	Purchaser
300520100	10	P1001	P1008	6.9	Secondary	1	12	Purchaser	Purchaser
300520100	15	P1008	P1013	2.3	Secondary	None	12	Purchaser	Purchaser
300520100	20	P1013	P806	7.1	Secondary	3	12	Purchaser	Purchaser
300520100	30	P806	P941	16.4	Secondary	3	12	Purchaser	Purchaser
300520100	40	P941	P914	22.4	Secondary	2	12	Purchaser	Purchaser
300520100	50	P914	P901	12.1	Secondary	2	12	Purchaser	Purchaser
300520100	60	P901	End	16.3	Spur	2	12	Purchaser	Purchaser
300520100	Subtotal			<b>83.5</b>					
300520110	10	P941	P826	3.4	Secondary	2,3	12	Purchaser	Purchaser
300520110	20	P826	P860	26.1	Spur	2	12	Purchaser	Purchaser
300520110	Subtotal			<b>29.5</b>					
300520115	10	P826	End	<b>6.0</b>	Spur	3		Purchaser	Purchaser
300520120	10	P914	End	<b>3.2</b>	Spur	2	12	Purchaser	Purchaser
300520122	10	P901	P1015	15.3	Spur	2	12	Purchaser	Purchaser
300520122	15	P1015	End	2.0	Spur	2	12	Purchaser	Purchaser
300520122	Subtotal			<b>17.3</b>					
<b>Total</b>				<b>199</b>					

*\*Note: All Roads must be less than 20% grade per 8 AAC 61.1060 Additional Logging Standards. Maximum road grade shall be based on DOF road class unless otherwise specified.*

*One Station = 100 Feet.*

***B. Road Side Slopes / Mass Wasting:***

For slopes over 50%, indicators of unstable areas (landslide scars, jack-strawed trees, gullied or dissected slopes, high density of streams or zero-order basins, or evidence of soil creep) are identified. Location specific road design is intended to mitigate identified areas of unstable soils.

Maximum percent road side slopes: 60%

There are no slopes >45%.

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

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

Full benching will be constructed to help ensure slope stability.

Full benching is not required for roads in this project.

End hauling will be implemented to help ensure slope stability.

End hauling is not necessary for roads in this project.

Location(s): There are several short segments of slopes over 45% associated with visible bed rock protrusions. These areas are generally less than 100 FT in length along the centerline of the road. All of the areas with these slopes have slope runouts to benches below them within a horizontal distance of less than 200 FT. Full bench construction will be required of the road running surface in these areas. The areas with these characteristics are in Unit 2 and 3 at approximately points P853-P860, P839 and P802-804. Upon verification of site conditions, side casting may be authorized by DOF based on the operator's submitted site-specific plans.

General Erosion Control:

grass seeding     erosion control mats     wattle     Other: Water bars

not applicable



### C. Crossing Structures:

[X] Crossing structures will be placed along access roads as described in the table below:

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

Road	Segment	Point Label	Bridge FT. or Culvert Diameter IN.	Structure Type:	AS 41.17.950 Stream Classification	Fish & Game AWC Number	Duration of crossing structure in place
300520100	15	P1013	60"	CPP	Tributary to anadromous >12%	None	Per Table 8
300520100	20	P806	48"	CPP	Tributary to anadromous >12%	None	Per Table 8
300520100	30	P811	18"	CPP	Surface Water	None	Per Table 8
300520100	30	P813	18"	CPP	Surface Water	None	Per Table 8
300520100	30	P816	24"	CPP	Surface Water	None	Per Table 8
300520100	30	P817	24"	CPP	Surface Water	None	Per Table 8
300520100	30	P819	24"	CPP	Surface Water	None	Per Table 8
300520100	40	P935	24"	CPP	Surface Water	None	Per Table 8
300520100	40	P931	18"	CPP	Surface Water	None	Per Table 8
300520100	40	P929	24"	CPP	Surface Water	None	Per Table 8
300520100	40	P923	24"	CPP	Surface Water	None	Per Table 8
300520100	50	P913	24"	CPP	Surface Water	None	Per Table 8
300520100	50	P910	24"	CPP	Surface Water	None	Per Table 8
300520100	50	P907	24"	CPP	Surface Water	None	Per Table 8
300520100	50	P906	24"	CPP	Surface Water	None	Per Table 8
300520100	50	P904	24"	CPP	Surface Water	None	Per Table 8
300520122	10	P1015	24"	CPP	Surface Water	None	Per Table 8
300520100	60	P1007	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
300520100	60	P1006	36"	CPP	Tributary to anadromous >12%	None	Per Table 8
300520100	60	P1004	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
300520100	60	P1002	24"	CPP	Tributary to anadromous >12%	None	Per Table 8
300520110	10	P824	18"	CPP	Surface Water	None	Per Table 8
300520110	10	P825	18"	CPP	Surface Water	None	Per Table 8
300520115	10	P829	18"	CPP	Surface Water	None	Per Table 8
300520115	10	P830	18"	CPP	Surface Water	None	Per Table 8
300520115	10	P832	18"	CPP	Surface Water	None	Per Table 8

Road	Segment	Point Label	Bridge FT. or Culvert Diameter IN.	Structure Type:	AS 41.17.950 Stream Classification	Fish & Game AWC Number	Duration of crossing structure in place
300520110	20	P835	18"	CPP	Surface Water	None	Per Table 8
300520110	20	P845	24"	CPP	Surface Water	None	Per Table 8
300520110	20	P849	18"	CPP	Surface Water	None	Per Table 8
300520110	20	P850	24"	CPP	Surface Water	None	Per Table 8
300520110	20	P851	18"	CPP	Surface Water	None	Per Table 8
300520110	20	P856	18"	CPP	Surface Water	None	Per Table 8
30063000	20	P5009	16"	LC	Tributary to anadromous >12%	None	Per Table 8
30063100	10	P5006	24"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1131	24"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1129	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1128	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1127	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1124	24"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1122	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1121	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1120	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1117	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1115	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1114	36"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1111	24"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1109	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1108	18"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1104	36"	CPP	Tributary to anadromous >12%	None	Per Table 8
30064000	10	P1103	24"	CPP	Tributary to anadromous >12%	None	Per Table 8

CPP= High Density Double Wall Polyethylene Corrugated Plastic Pipe or Equivalent.  
LC= Log Culvert

**D. Road Closure:**

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

**Table 8. Road Closures**

Road ID	Segment	Unit	Closure Type All /Winter	Estimated Closure Date	Projected Road Use After Timber Harvest
300520100	10	1	All Season	TBD	Silviculture
300520100	15	Non-Merchantable	All Season	TBD	Silviculture
300520100	20	3	All Season	TBD	Silviculture
300520100	30	3	All Season	TBD	Silviculture
300520100	40	2,3	All Season	TBD	Silviculture
300520100	50	2	All Season	TBD	Silviculture
300520100	60	2	All Season	Close of Timber Sale	Silviculture
300520110	10	2	All Season	TBD	Silviculture
300520110	20	2	All Season	TBD	Silviculture
300520115	10	2,3	All Season	Close of Timber Sale	Silviculture
300520120	10	2	All Season	Close of Timber Sale	Silviculture
300520122	10	2	All Season	TBD	Silviculture
300520122	15	2	All Season	Close of Timber Sale	Silviculture
30063000	10	5	All Season	TBD	Silviculture
30063000	20	5	All Season	Close of Timber Sale	Silviculture
30063100	10	5	All Season	Close of Timber Sale	Silviculture
30064000	21	4	All Season	TBD	Silviculture

*TBD: "To be determined" based on funding and authorization of the land manager. The DOF by default instructs the timber purchaser to close all timber sale roads upon completion of harvest. The DOF will relieve the purchaser of this responsibility on a site-specific basis if agency funding is in place to maintain the road or a road management agreement is in place with a recognized entity that meets the approval of the DNR.*

**E. Material Extraction:**

- [ ] There will be no material extraction sites in the project area.
- [ ] Material extraction and associated overburden disposal will be located outside of riparian areas and muskegs. Material extraction and disposal will be located as shown on the operation map, in a manner that prevents runoff from entering surface waters.
- [X] Other: Material extraction and associated overburden disposal will be located outside of riparian areas and muskegs. Material extraction and disposal locations will be selected by the purchaser and written site plan approval will be required by the Division of Forestry. Material sites will generally be on or adjacent to the identified roads.

Note: An existing material site on the east side of the 30000 Road approximately 1,200 FT north of the proposed 300640000 Road the 300000 Road junction may be used. Existing unauthorized abandoned cars and appliances may obstruct the usability of the area. The DMLW has been consulted on the conditions.

**F. Other Resources Affected by-Roads or Material Extraction:**

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

**Table 9. Other Affected Resources**

Impacted Resource	Reviewing Agency	Impact/ Mitigation Actions
Visual	DOF/ DMLW	Change in landscape appearance /None
Noise	DOF	Operating Noise/ Timber Sale Contract
Public Safety	DOF	Traffic/ Timber Sale Contract (see note)
Air Quality	DOF/DEC	Dust/ Water roads

Notes:

1. Noise. Engine noise associated with large log trucks and equipment may add objectionable noise to the neighborhood. The purchaser to the extent that it is feasible to safely brake trucks coming off the timber sale will not use engine brakes. Noise may be mitigated as feasible by hours of operation.
2. Public Safety. Signs will be placed to advise the public of timber sale traffic in the area. The purchaser will also have a community outreach and communication plan regarding the timber sale traffic. Where site specific use in the community is occurring (i.e.- commuting to school) reasonable adjustments to hauling times will be made to minimize traffic risk.
3. The added truck traffic has the potential to increase dust in the subdivision area if conditions are dry; watering of the road surface to keep dust down in these conditions will be part of the timber sale operating plan.

**V. Approval**

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



04/03/2023

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**Commissioner**

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**Date**

## **VI. Reconsideration**

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

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

If no reconsideration is filed by that date, this decision goes into effect as a final order and decision on April 26, 2023.

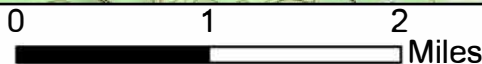
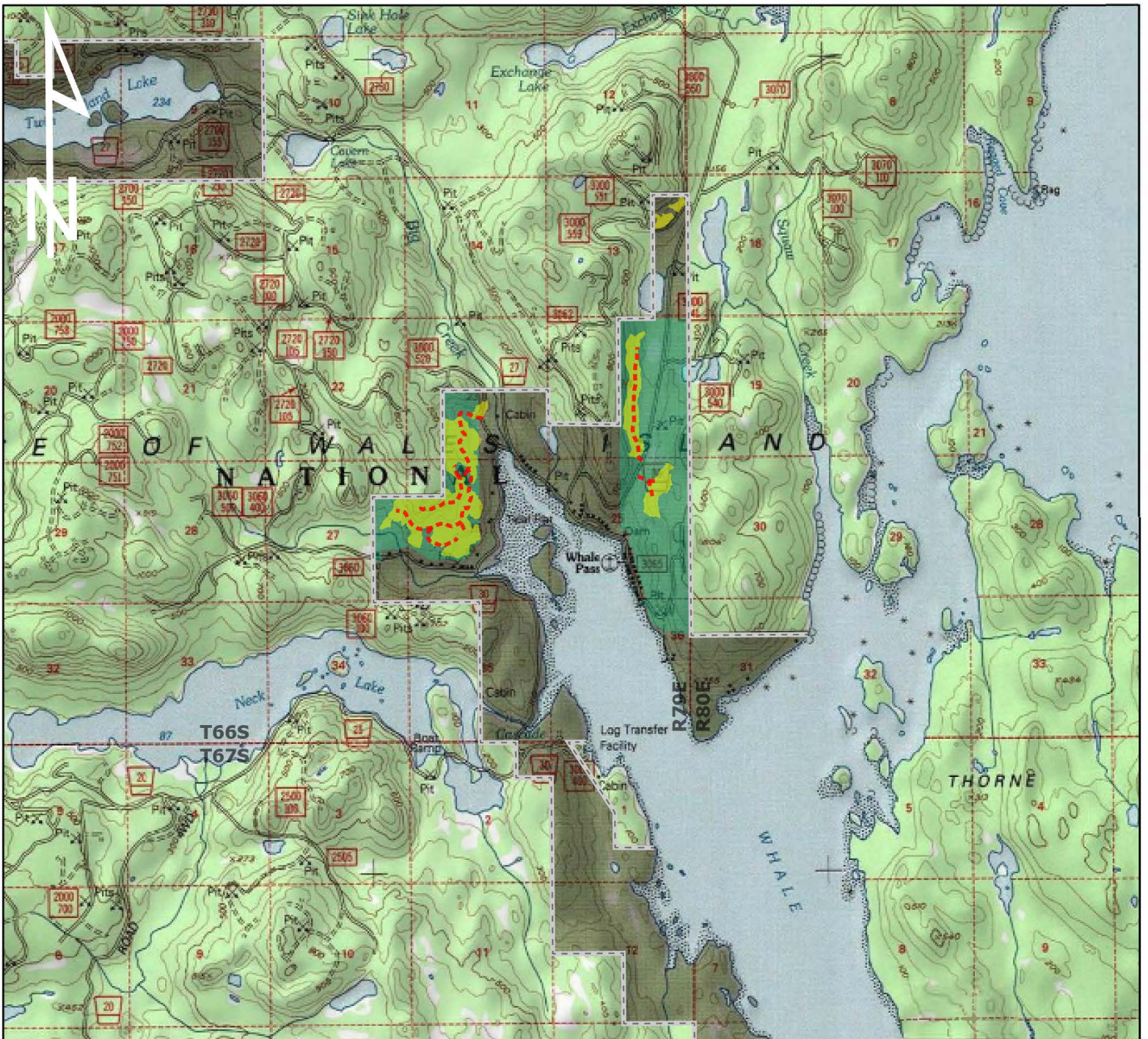
A copy of 11 AAC 02 is enclosed and is also available on the department's website at <https://dnr.alaska.gov/mlw/pdf/DNR-11-AAC-02.pdf>.

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

**Appendix A: Whale Pass Timber Sale Maps**

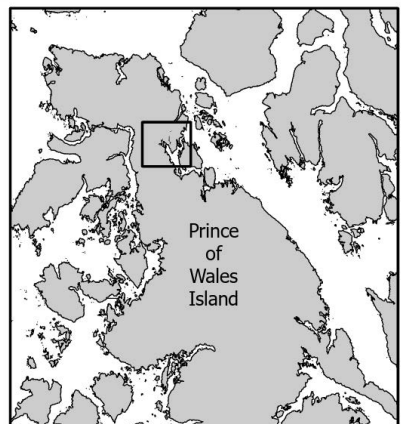
*Appendix A1 Whale Pass Area Map (1 page)*

*Appendix A2 Whale Pass Unit Maps (6 pages)*



Esri, NASA, NGA, USGS, FEMA, Copyright: © 2013 National Geographic Society, Incubed, City and Borough of Wrangell, State of Alaska, Esri Canada, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, NRCAN, Parks Canada

Area Map 1 in = 1 Mile



Vicinity Map 1 in = 32 miles

**LEGEND**

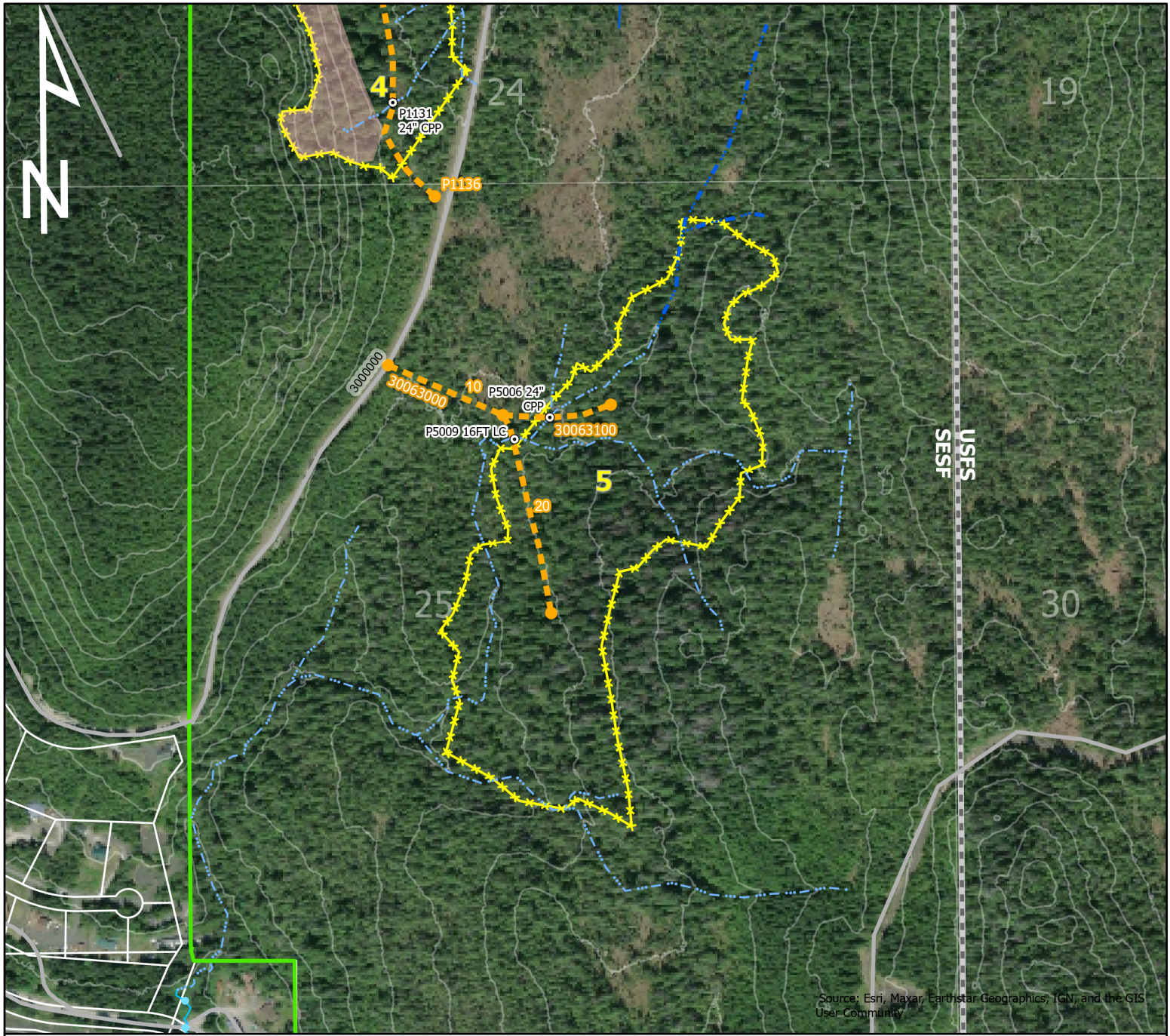
	Major Property Line
	Proposed Road
	Proposed Harvest Unit
	Southeast State Forest
	Other State/Private Land

**APPENDIX A1  
SSE-1378 K  
WHALE PASS TIMBER SALE  
AREA MAP**

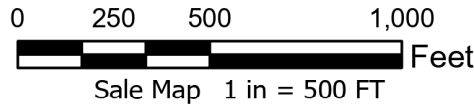








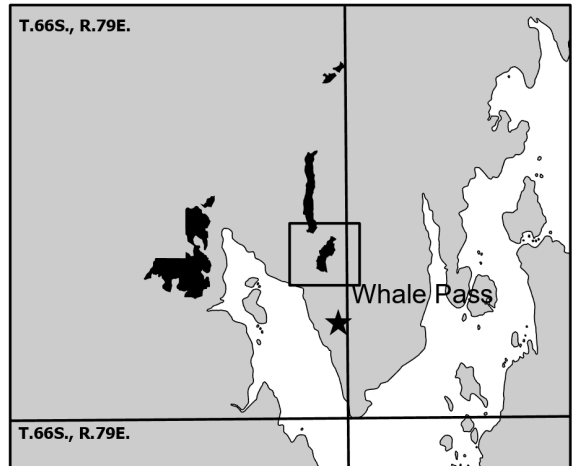
Source: Esri, Maxar, Earthstar Geographics, IGN, and the GIS User Community



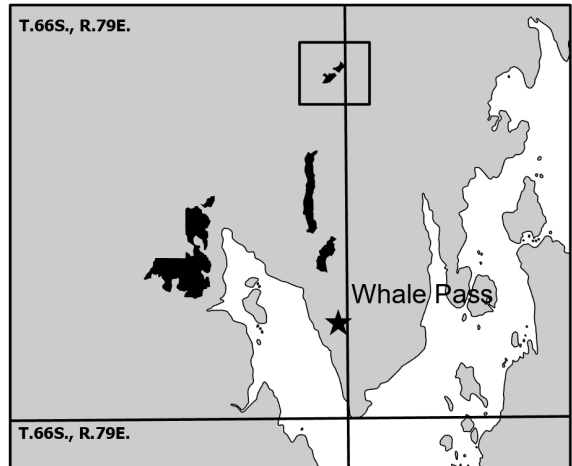
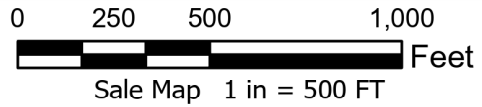
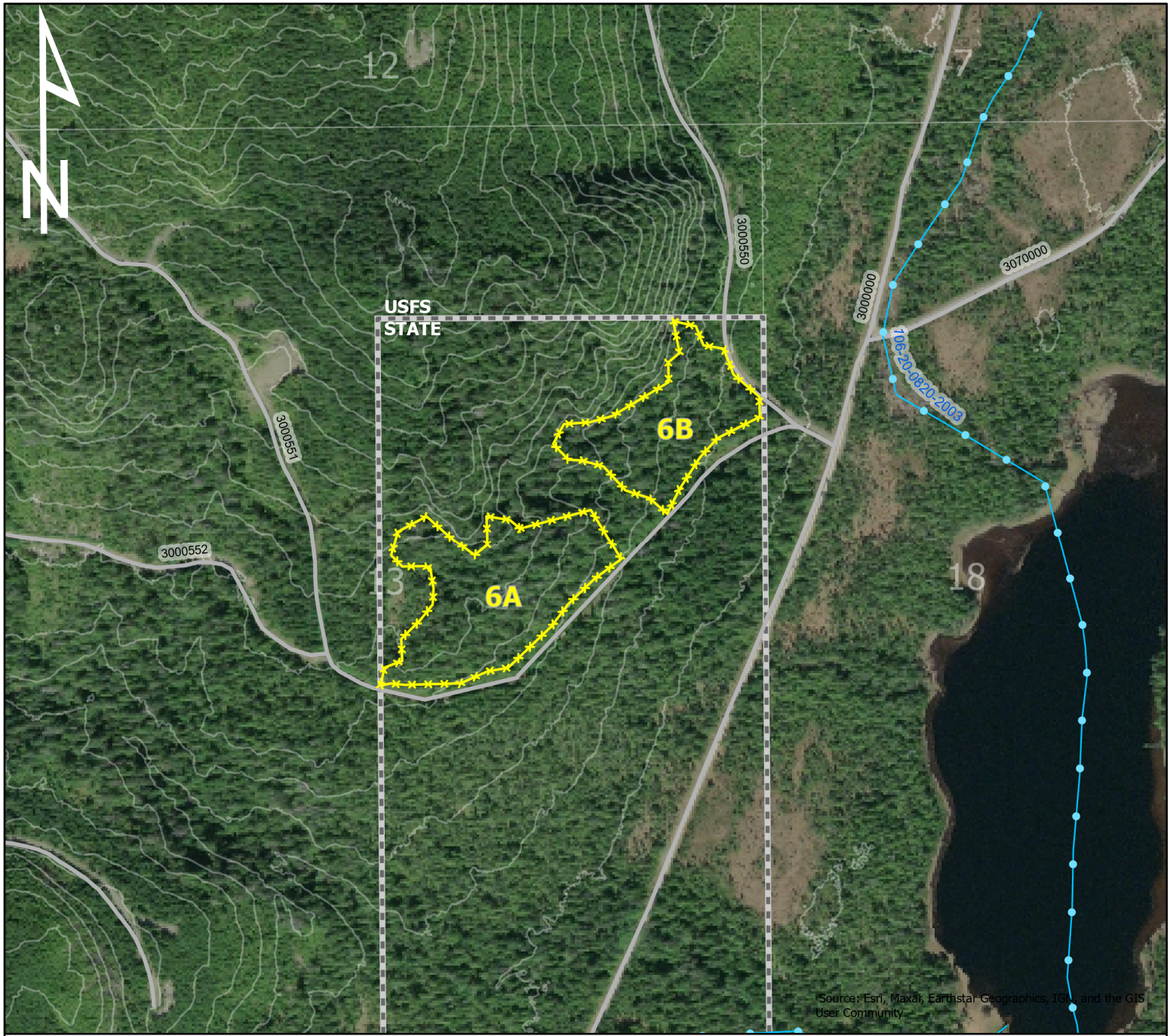
Contour Interval = 40 FT  
Source: USFS LiDAR 2018

Legend	
	Proposed Harvest Unit
	Proposed Cable Harvest
	Proposed Partial Harvest
	Subdivision
	Southeast State Forest (SESF)
	Property Line
	Proposed Road
	Existing Road
	Rock Pit
	Proposed Drainage Structure
	Water Rights
	Cataloged Anadromous
	Non-Cataloged Anadromous
	Resident Fish
	Tributary to Anadromous <12%
	Tributary to Anadromous >12%
	General Water Quality

**APPENDIX A2**  
**SSE-1378 K**  
**WHALE PASS TIMBER SALE**  
**MAP 5 UNIT 5**



Vicinity Map 1 in = 3 miles



Vicinity Map 1 in = 3 miles

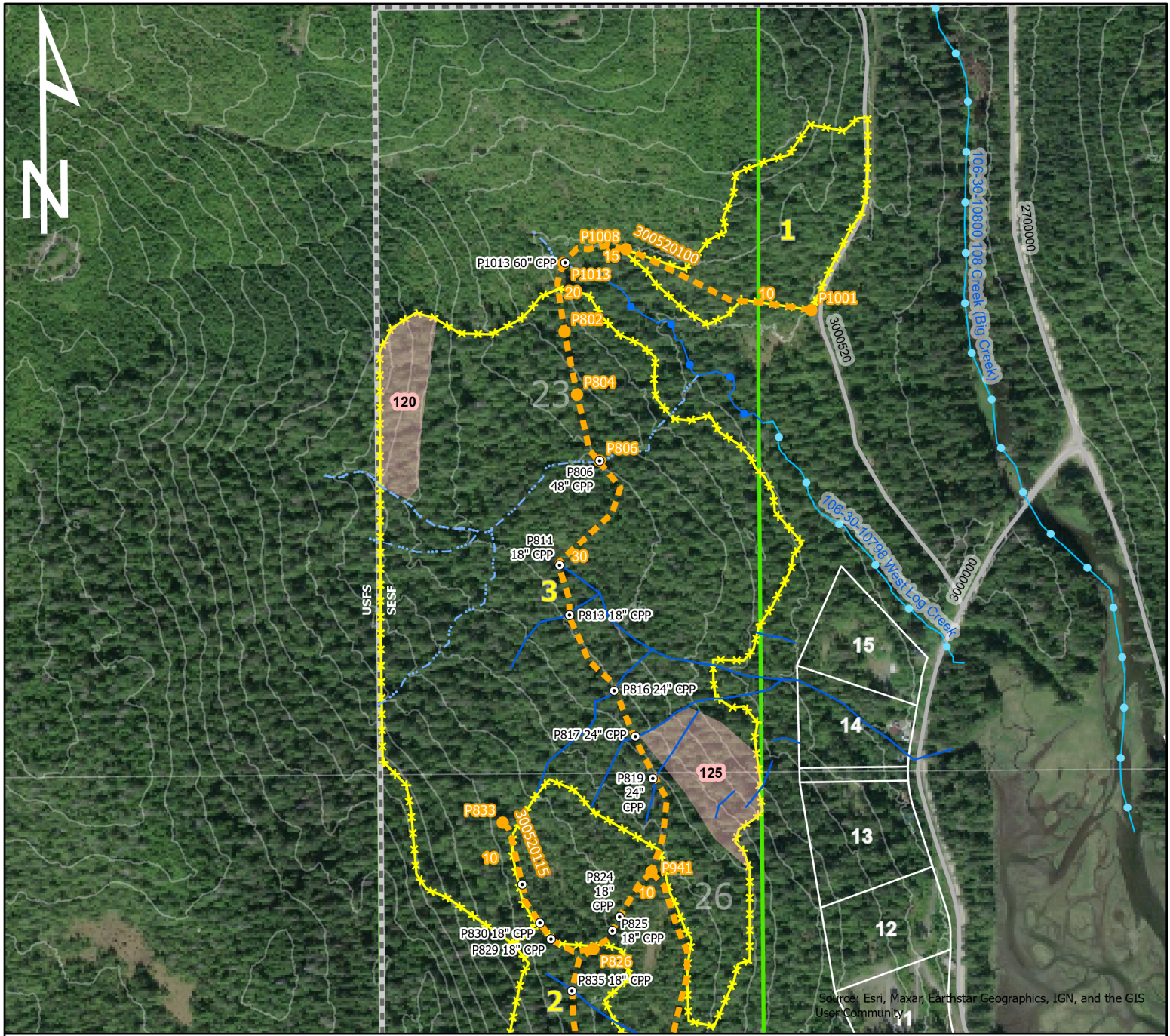
**Legend**

- Proposed Harvest Unit
- Proposed Cable Harvest
- Proposed Partial Harvest
- Subdivision
- Southeast State Forest (SESF)
- Property Line
- Proposed Road
- Existing Road
- Rock Pit
- Proposed Drainage Structure
- Water Rights
- Cataloged Anadromous
- Non-Cataloged Anadromous
- Resident Fish
- Tributary to Anadromous <12%
- Tributary to Anadromous >12%
- General Water Quality

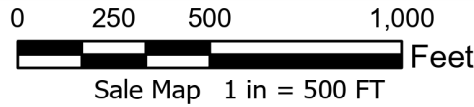
Contour Interval = 40 FT  
Source: USFS LiDAR 2018

**APPENDIX A2**  
**SSE-1378 K**  
**WHALE PASS TIMBER SALE**  
**MAP 6 UNIT 6**





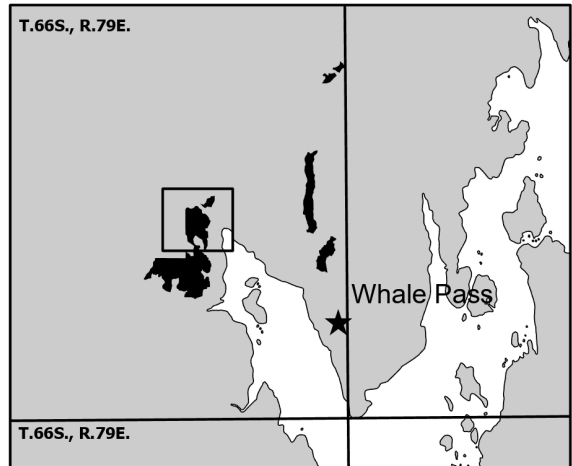
Source: Esri, Maxar, Earthstar Geographics, IGN, and the GIS User Community



Contour Interval = 40 FT  
Source: USFS LiDAR 2018

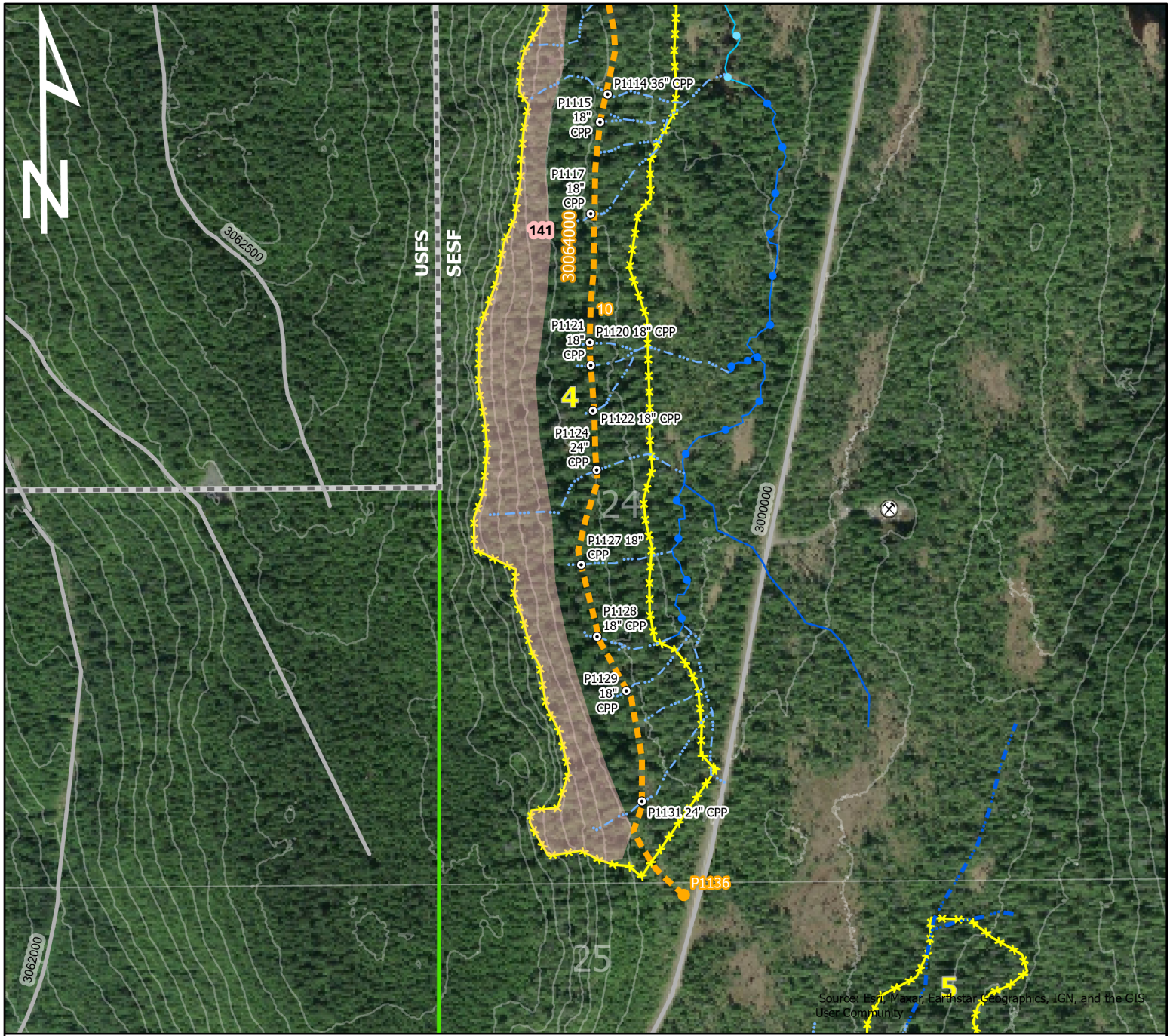
Legend	
	Proposed Harvest Unit
	Proposed Cable Harvest
	Proposed Partial Harvest
	Subdivision
	Southeast State Forest (SESF)
	Property Line
	Proposed Road
	Existing Road
	Rock Pit
	Proposed Drainage Structure
	Water Rights
	Cataloged Anadromous
	Non-Cataloged Anadromous
	Resident Fish
	Tributary to Anadromous <12%
	Tributary to Anadromous >12%
	General Water Quality

**APPENDIX A2**  
**SSE-1378 K**  
**WHALE PASS TIMBER SALE**  
**MAP 1 UNITS 1, 3**

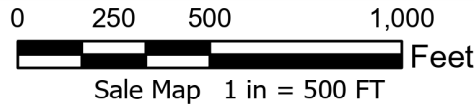


Vicinity Map 1 in = 3 miles





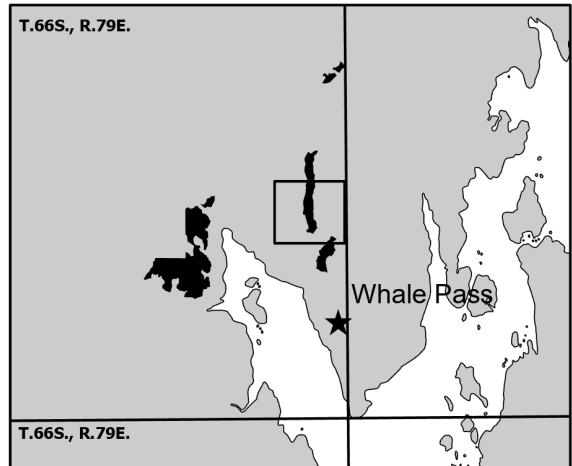
Source: Esri, Maxar, Earthstar Geographics, IGN, and the GIS User Community



Contour Interval = 40 FT  
Source: USFS LiDAR 2018

Legend	
	Proposed Harvest Unit
	Proposed Cable Harvest
	Proposed Partial Harvest
	Subdivision
	Southeast State Forest (SESF)
	Property Line
	Proposed Road
	Existing Road
	Rock Pit
	Proposed Drainage Structure
	Water Rights
	Cataloged Anadromous
	Non-Cataloged Anadromous
	Resident Fish
	Tributary to Anadromous <12%
	Tributary to Anadromous >12%
	General Water Quality

**APPENDIX A2**  
**SSE-1378 K**  
**WHALE PASS TIMBER SALE**  
**MAP 4 UNIT 4 SOUTH**



Vicinity Map 1 in = 3 miles

## **Appendix B: Supporting Information**

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

**Alaska Forest Practices and Regulations.**

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

**Forest Road Standards.**

[http://forestry.alaska.gov/Assets/pdfs/resources/forest\\_road\\_standard\\_design\\_20151231.pdf](http://forestry.alaska.gov/Assets/pdfs/resources/forest_road_standard_design_20151231.pdf)

## **Appendix C: Appeal Statutes and Regulations**

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

### **11 AAC 02 Regulations**

#### **11 AAC 02.010. Applicability and eligibility.**

(a) This chapter sets out the administrative review procedure available to a person affected by a decision of the department. If a statute or a provision of this title prescribes a different procedure with respect to a particular decision, that procedure must be followed when it conflicts with this chapter.

(b) Unless a statute does not permit an appeal, an applicant is eligible to appeal or request reconsideration of the department's decision on the application. An applicant is eligible to participate in any appeal or request for reconsideration filed by any other eligible party.

(c) If a statute restricts eligibility to appeal or request reconsideration of a decision to those who have provided timely written comment or public hearing testimony on the decision, the department will give notice of that eligibility restriction as part of its public notice announcing the opportunity to comment.

(d) If the department gives public notice and allows a public comment period of at least 30 days on a proposed action, and if no statute requires opportunity for public comment, the department may restrict eligibility to appeal or request reconsideration to those who have provided timely written comment or public hearing testimony on the proposed action by including notice of the restriction as part of its public notice announcing the opportunity to comment.

(e) An eligible person affected by a decision of the department that the commissioner did not sign or cosign may appeal the decision to the commissioner within the period set by 11 AAC 02.040.

(f) An eligible person affected by a decision of the department that the commissioner signed or cosigned may request the commissioner's reconsideration within the period set by 11 AAC 02.040.

(g) A person may not both appeal and request reconsideration of a decision.

#### **11 AAC 02.015. Combined decisions.**

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

(b) Repealed 12/27/2012.

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

(a) Unless otherwise provided in a statute or a provision of this title, an eligible person must first either appeal or request reconsideration of a decision in accordance with this chapter before appealing a decision to superior court.

(b) The commissioner's decision on appeal is the final administrative order and decision of the department for purposes of appeal to the superior court.



(c) The commissioner may order or deny a request for reconsideration within 30 calendar days after issuance of the decision, as determined under 11 AAC 02.040(c) - (e). If the commissioner takes no action during the 30-day period, the request for reconsideration is considered denied. Denial of a request for reconsideration is the final administrative order and decision of the department for purposes of appeal to the superior court.

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

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

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

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

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

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

- (1) comments already received from the appellant and others;

- (2) whether the additional material is likely to affect the outcome of the appeal;
  - (3) whether the additional material could reasonably have been submitted without an extension;
  - (4) the length of the extension requested;
  - (5) the potential effect of delay if an extension is granted.
- (d) If public notice announcing a comment period of at least 30 days was not given before the decision, an appellant may submit additional written material after the deadline for filing the appeal, if the appeal meets the requirements of (a) of this section and includes a notice of intent to file the additional written material. The department must receive the additional written material within 20 days after the deadline for filing the appeal, unless the appeal also includes a request for an extension of time, and the department determines that the appellant has shown good cause for an extension. In considering whether the appellant has shown good cause, the department will consider factors including one or more of the following:
- (1) comments already received from the appellant and others;
  - (2) whether the additional material is likely to affect the outcome of the appeal;
  - (3) whether the additional material could reasonably have been submitted without an extension;
  - (4) the length of the extension requested;
  - (5) the potential effect of delay if an extension is granted.
- (e) At the time a request for reconsideration is filed, and up until the deadline to file a request for reconsideration, an appellant may submit additional written material in support of the request for reconsideration, including evidence or legal argument. No additional written material may be submitted after the deadline for filing the request for reconsideration.
- (f) If the decision is one described in 11 AAC 02.060(c), an appellant may ask for a stay as part of the appeal or request for reconsideration. The appellant must include an argument as to why the public interest requires a stay.

**11 AAC 02.040. Timely filing; issuance of decision.**

- (a) To be timely filed, an appeal or request for reconsideration must be received by the commissioner's office within 20 calendar days after issuance of the decision, as determined under (c) or (d) of this section, unless another period is set by statute, regulation, or existing contract. If the 20th day falls on a day when the department is officially closed, the appeal or request for reconsideration must be filed by the next working day.
- (b) An appeal or request for reconsideration will not be accepted if it is not timely filed.
- (c) If the appellant is a person to whom the department delivers a decision by personal service or by certified mail, return receipt requested, issuance occurs when the addressee or the addressee's agent signs for the decision. If the addressee or the addressee's agent neglects or refuses to sign for the certified mail, or if the address that the addressee provided to the department is not correct, issuance by certified mail occurs when the decision is deposited in a United States general or branch post office, enclosed in a postage-paid wrapper or envelope, addressed to the person's current address of record with the department, or to the address specified by the appellant under 11 AAC 02.030(a)(11).
- (d) If the appellant is a person to whom the department did not deliver a decision by personal service or certified mail, issuance occurs
  - (1) when the department gives public notice of the decision; or
  - (2) if no public notice is given, when the decision is signed; however, the department may state in the decision a later date of issuance and the corresponding due date for any appeal or request for reconsideration.
- (e) The date of issuance constitutes delivery or mailing for purposes of a reconsideration

request under AS 44.37.011(d) or AS 44.62.540(a).

### **11 AAC 02.050. Hearings.**

- (a) The department will, in its discretion, hold a hearing when questions of fact must be resolved.
- (b) The hearing procedure will be determined by the department on a case-by-case basis. As provided in 11 AAC 02.030(a)(13), any request for special procedures must be included with the request for a hearing.
- (c) In a hearing held under this section
  - (1) formal rules of evidence need not apply; and
  - (2) the hearing will be recorded, and may be transcribed at the request and expense of the party requesting the transcript.

### **11 AAC 02.060. Stays; exceptions.**

- (a) Except as provided in (c) and (d) of this section, timely appealing or requesting reconsideration of a decision in accordance with this chapter stays the decision during the commissioner's consideration of the appeal or request for reconsideration. If the commissioner determines that the public interest requires removal of the stay, the commissioner will remove the stay and allow all or part of the decision to take effect on the date set in the decision or a date set by the commissioner.
- (b) Repealed 9/19/2001.
- (c) Unless otherwise provided in a statute or a provision of this title, a decision takes effect immediately if it is a decision to
  - (1) issue a permit that is revocable at will;
  - (2) approve surface operations for a disposal that has already occurred or a property right that has already vested; or
  - (3) administer an issued oil and gas lease or license, or an oil and gas unit agreement.
- (d) Timely appealing or requesting reconsideration of a decision described in (c) of this section does not automatically stay the decision. However, the commissioner will impose a stay, on the commissioner's own motion or at the request of an appellant, if the commissioner determines that the public interest requires it.
- (e) A decision takes effect immediately if no party is eligible to appeal or request reconsideration and the commissioner waives the commissioner's right to review or reconsider the decision.

### **11 AAC 02.070. Waiver of procedural violations.**

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

### **11 AAC 02.900. Definitions.**

In this chapter,

- (1) "appeal" means a request to the commissioner to review a decision that the commissioner did not sign or cosign;
- (2) "appellant" means a person who files an appeal or a request for reconsideration;
- (3) "commissioner" means the commissioner of natural resources;
- (4) "decision" means a written discretionary or factual determination by the department specifying the details of the action to be allowed or taken;
- (5) "department" means, depending of the particular context in which the term is used, the Department of Natural Resources, the commissioner, the director of a division within the

Department of Natural Resources, or an authorized employee of the Department of Natural Resources;

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

**Appendix D: DRAFT FLUP Comment**

**Appendix D**

**SSE-1378-K, Whale Pass Timber Sale  
Comments & Responses**

Department of Natural Resources, Division of Forestry  
March 2023

The following people commented on the Proposed Whale Pass Timber Sale SSE-1378-K during or proximate to the comment period that ended on October 17, 2022, for the Forest Land Use Plan:

Jeff Stepp for/  
Rep. Kreiss-Tomkins  
Alaska State Legislature

Rep. Dan Ortiz  
Alaska State Legislature

Dave Roberts  
Alaska's Fish Tales Lodge

Dawn Waldal-Anderson  
City of Whale Pass, Mayor

City of Whale Pass

Greg Lockwood DOT

Don Haberger

First Things First Alaska  
Foundation

Joe Kahklen  
First Things First Alaska  
Foundation

Andrea Hernandez  
Point Baker Community  
Association

Katie Rooks  
SEACC

Winston Smith  
UA Fairbanks

Whale Pass School  
C/O Andy Cook

Aaron Brakel  
Adrian Gillissen  
Alex Schirmer  
Alexander McVickar  
Alexandra Voelker  
Amanda Kiely  
Amy Nye  
Andrea Doll  
Angie Dixon  
Angus M. MacDonald  
Anissa Berry  
Ann Nowicki  
Anna Cowen  
Anne Connelly  
Annette Coomber  
Anouk Otsea  
Antoine Doiron  
Beverly Folkers

Bill McLaughlin  
Borja Rodriguez  
Brenda Johnson  
Brian Gringas  
Brittany Woods  
Bruce Connery  
Bryan Wyberg  
Carol Dejka  
Carol Hale  
Cheryl Fecko  
Chilton Bowman  
Chloe Van Loon  
Christian Thalacker  
Christine St. Pierre  
Cici Cyr  
Cindy Wagner  
Clay Frick  
Clinton Welburn  
Colin Arisman  
Conrad Muller  
Cristina Tirelli  
Crystal Toman  
Dain Myuers  
Dale Pihlman  
Dan Cannon  
Dan Jordan  
Dana Kelly  
Danielle Redmond  
Dave Metz  
David Love  
Dawn Waldal-Anderson  
Deborah Gravel  
Deirdre Downey

Della Coburn  
Dennis Schaef  
Donna Delany  
Donna Mulvey  
Dylan Martin  
Ed Douville  
Elizabeth Figus  
Elizabeth Hackl  
Elizabeth Karasik  
Emily Schmitt  
Erin Keiper  
Erin Michael  
Evelyna Vigola  
Fine Decent Entity  
Gabriel Andrus  
Gary Bull  
Gerald Martin  
Gina Hackett  
Glen Huntington  
Gordon Chew  
Gordon Wood  
Gretchen Randolph  
Gwen Lockwood  
Hallie Brown  
Heather Babb  
Hilary Atwood  
James Baichtal  
James Kelly  
James Mackovjak  
James Taggart  
James Thomas Greeley SR  
James Greely  
James Unger

Jan Conitz  
Jan Crichton  
Janece Kenyon  
Jay Crondahl  
Jean Tibbetts  
Jeanette McBride  
Jenna Krzesicki  
Jenny Simpson  
Jeremy Bauer  
Jim Thiele  
Joan McBeen  
Joe Delmonico  
Johanna Bakker  
John Dandurand  
John Hudson  
John Sonin  
John Svenson  
JoLynn Jarboe  
Jon Brock  
Jon Brock  
Jordan Hamann  
Judy Macnak  
Julian Matthews  
Justin Moody  
Justine Armentrout  
June Yamrick  
Kaelen Delacastillo  
Kaiko'o Victor  
Kara Davis  
Karl Roy  
Kate Olender  
Katherine Murdock  
Katie Bode

Kathleen Mireault  
Kathy Kirsch  
Katie Bode  
Kelly Kramer  
Kendall Van Horssen  
Kenneth Bawer  
Kevin Main  
Kevin and Carlene Allred  
Kirby Karpan  
Kirsten Keihl  
Lanha Hong  
Laura Hanks  
Laura West  
Lauren Cusimano  
Lesley Kempself  
Linda Fitzgerald  
Linda Sharp  
Linda Shaw  
Lisa Kramer  
Lisa Sadleir-Hart  
Luann McVey  
Lynn Wilbur  
Lynne Camerson  
Maddie Halloran  
Marc Hutchinson  
Marc Martinson  
Marcia Cornett  
Margo Waring  
Marie Johanson  
Marika Hintz  
Marilyn Dougher  
Mary Sano  
Mathias Weibel

Matthew Beck\*  
Matthew Gelso  
Maureen Knutsen  
Maxwell Klare  
Maya Yoshikawa  
Mel Izard  
Michael Clark  
Michael Thompson  
Michael Wald  
Michael Wallace  
Michele Cornelius  
Mike & Tyra Huestis  
Mike Falvey  
Mike Hekkers  
Mike Macy  
Morgan Buckert  
Naomi Muehleck  
Natalie Watson  
Nicholas Dalessio  
Nichole Pope  
Nikoli Stevens  
Nina Maus  
Nina Schwinghammer  
Padraig New  
Pal Arneson  
Pam Beck\*  
Pat Layden  
Patricia Kermoian  
Patricia Layden  
Patricia Welch\*  
Patrick Comer  
Paul Andy  
Paul Davis

Phillip Ratcliff  
Rachael Juzeler  
Rachel Lackey  
Rachel Youens  
Rainer Judd  
Rana LaPine  
Randy Toman  
Randall Clarke  
Richard Etheridge  
Richard Farnell  
Road Parlee  
Rob Lawrence  
Robin Houston  
Rodger Painter  
Rosemary McGuire  
Salome Starbuck  
Sandra Ashmore  
Sandra Donahue  
Sara Ryan  
Sarah Stewart  
Scott Hixon  
Scott Pearce  
Shaun McGraw  
Shawn Emery  
Shawn Emery  
Shawn O'Donnell  
Shelley Stallings  
Shep Griswold  
Shereen Baker  
Steve Copenhaver  
Steve Lewis and/or Rachel Myron  
  
Stuart Helmtoller



Stuart Morton  
Susan Taylor  
Suzanne Eiseman  
Teague Whalen  
Teresa Kaneko  
Terri Yeager  
Terry Cummings  
Theresa Wirak  
Tim Miller  
Timbi Barron

Tina Arlington  
Toby Campbell  
Tom Boutin  
Toni Ward  
Tyler Jazo  
Tyler S.\*  
Ursula Cohrs  
V Kulikow  
Valerie Massie  
Veronica Arrants

Vicki Vermillion  
Virgene Link-New  
Virginia Bottorff  
Wendel Raymond  
Wesley Wolf  
William Evers  
William O'Brien  
Zachary Brown

\* Indicates the comment was postmarked or received after the deadline for comment.

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The following comments were received during the public comment period on the Draft Forest Land Use Plan for the Whale Pass Timber Sale. Copies of the submitted comments are available upon request:

Commenter	Comment	Response
	<b>General Timber Sale Input</b>	
<ul style="list-style-type: none"> <li>Form Comments Ibid: Mel Izard</li> <li>James Greeley SR.</li> </ul>	Canceling the sale would be a better decision for salmon, deer, and the people who rely on both while cherishing their homes in the community of Whale Pass and Prince of Wales Island.	Please see the Best Interest Finding. Comment noted, no change made.
Kaelen Decastillo	Just was reading about the whales pass timber sale and laughed when loggers refer to clear cut as harvesting. Sorry was a child when the clear cuts happened west of Juneau. The forest has not grown back the same after over 30yrs. So unless you selectively log that's not a harvest cycle. What harvest cycle is clear cut / a 300 yr cycle. That being said as a forager of wild foods selective logging isn't the same. So remember be good to your mother and be sustainable. Don't take and think about the impact when your grandchildren are born.	Please see the Best Interest Finding. Comment noted, no change made.
Dr. Wendel Raymond	I believe that sale would irreparably harm ecosystems and cultural heritage and that this far outweighs the short term benefits of timber production.	Please see the Best Interest Finding. Comment noted, no change made.
Janece Kenyon	<p>There are noticeable stands of dead trees appearing in S.E. Alaska. Weather Beetles or a blight is the probable cause.</p> <p>These stands should be considered before clear cutting healthy stands. One of these affected areas is on the hillside above the Ketchikan Airport.</p>	Please see the Best Interest Finding. Comment noted, no change made.
Tim Miller	If the State doesn't have land suitable for logging away from these small communities, then the State doesn't have land suitable for	Please see the Best Interest Finding. Comment noted, no change made.

Commenter	Comment	Response
	<p>logging.</p> <p>For you to infer that there's some special, "... value comes from the mix of wood — red cedar, yellow cedar, western hemlock and Sitka spruce..." is a disingenuous statement.</p>	
Angie Dixon	<p>We cannot exist without clean water, healthy food and clean air. Alaska by leaving its ecosystems intact provides that to its human residents and all species who live there and it affects every other place on this planet.</p>	<p>Please see the Best Interest Finding. Comment noted, no change made.</p>
Bill McLaughlin	<p>The removal of these trees is nothing less than a crime against the planet and the species that depend on a moderate and predictable climate.</p>	<p>Please see the Best Interest Finding. Comment noted, no change made.</p>
Rep Jonathan Kreiss-Tomkins	<p>I respectfully request that you modify the Draft Forest Land Use Plan for the Whale Pass timber sale and return to the drawing board with the City of Whale Pass to reach a reasonable compromise that will benefit both the State of Alaska and residents of Whale Pass.</p> <p>Since early July, I have heard from constituents in Whale Pass who are deeply concerned about the timber sale and the impact it will have on the community. I am also in receipt of the public comments submitted to the Alaska Division of Forestry by the City of Whale Pass and Mayor Dawn Waldal-Anderson. I align myself with their remarks and echo their concerns.</p>	<p>Please see the Best Interest Finding. Comment noted, no change made.</p>
Point Baker Community Association	<p>The Point Baker Community Association supports the Friends of Whale Pass in their opposition to this sale which will negatively impact their way of life, their quality of life and their economy.</p>	<p>Please see the Best Interest Finding. Comment noted, no change made.</p>

Commenter	Comment	Response
Dave Roberts Alaska Fish Tales Lodge	Please consider the people and businesses that will be negatively impacted and weigh that against the financial gain from the timber sale. I am sure that there will be some type of logging operation in the area, I just ask that there is some type of buffer zone between that project and the community.	Please see the Best Interest Finding. Comment noted, no change made.
Cheryl Fecko	Prince of Wales Island has seen decades of extensive old growth timber harvest, including the area in and around Whale Pass. More consideration should be given to the cumulative impacts of federal, state, and private clearcuts on deer, salmon, and other wildlife habitats, viewsheds, property and lifestyle values. More emphasis should be placed on the economic value of an intact old growth forest. The State should be a leader in sustainable forest management, using innovative techniques, selective harvests, and smaller clearcuts with larger buffers. We need to support small operators and local workers.	Please see the Best Interest Finding. Comment noted, no change made.
SEAAC Page 1	Second, the draft FLUP, along with the previous preliminary and final Best Interest Finding (BIF) documents, is in direct conflict with area management plans regarding recreation, scenic, and fish and wildlife resources.	Please see the Best Interest Finding. Comment noted, no change made.
SEAAC Page 1	Third, the draft FLUP shows no evidence of additional fieldwork, agency analysis, multiple-use management considerations, or consideration of public input that was promised in the final BIF.	The DOF conducted extensive field work prior to the issuance of the best interest finding. The preponderance of the sale was designed and flagged in the field during that phase of the project because of its proximity to and the interest of the community. The planning effort that occurred after the BIF decision has focused on quantifying the resources (surveying, timber cruising, etc.), verifying previous observations, adapting to agency requests and

Commenter	Comment	Response
		examining viewpoints expressed in the public comment.
SEACC Page 6	<p>The SESFMP also discusses protection for fish and wildlife. It states that Southeast State Forest management will “maintain the fish and wildlife resources that support commercial, recreational, and subsistence activities.” The Whale Pass timber sale will create additional impact on an already heavily impacted area in terms of anadromous streams and old-growth wildlife habitat. It would be unreasonable to suggest that the State is meeting the needs of the developing City of Whale Pass, protecting important viewsheds, valuable recreation areas, or fish and wildlife habitat via this timber sale. The draft FLUP ignores other resources that would be directly impacted by the sale in this area. Despite widespread opposition from the public, there are no significant changes between the final BIF and the draft FLUP. In particular, any serious attempt to mitigate the impacts of the timber sale on recreation, visual, and fish and wildlife resources important to Whale Pass has been ignored by the DOF.</p> <p>The DOF should omit any and all lands outside the Southeast State Forest classification from this sale. Lands on the hillside west of Whale Passage should be omitted from the sale.</p>	<p>Through consultation with ADF&amp;G, the DOF has protected the fish and wildlife resources as required under statute. With respect to wildlife, we have reserved a travel corridor through the sale area and also left additional timber standing adjacent to the 108 Creek retention anadromous corridor with respect to its multiuse importance to the community.</p> <p>Preserving the forest for site specific visual concerns is not a reasonable action considering the land classification intent. Providing retention specifically for visual resources and recreation at the scale requested is in opposition to harvesting the timber in a feasible manner on this site. Residual harvest conditions will not be strikingly different than past timber harvest and is not out of character with the rest of the island’s development.</p> <p>The proposed timber sale on the west side of the community contains approximately three acres on Settlement classified lands next to the Southeast State Forest. The harvest of the timber on the settlement classified area fits the topographic and timber type break and is a logical configuration for the unit line. The harvest of the timber will not preclude existing or future settlement use, the topography limits the area from being functionally used for settlement. The inclusion of the timber is a reasonable action considering the available equipment, the timber’s otherwise isolated location and its revenue potential. Removing or leaving the timber is not a risk to the existing subdivision.</p>
Pam and Matthew Beck	<p>Back in 2020 when this sale was still in the 5-year schedule, we were told if we wanted to be notified when anything was moving forward that we needed to document a concern, request to be added to the notification list that we would receive all notifications concerning the sale. We submitted both emails and mailing address, but the receiving of notifications has</p>	<p>Public notification is required by statute for the BIF and the FLUP. Our intent is to be transparent. We apologize that you were not specifically notified per your discussions with staff. Our intent is to communicate with those interested in the action. We regret that we did not follow through with respect to notifying you personally and that you had to learn of the plan developed in our broader public notification</p>

Commenter	Comment	Response
	<p>not happened. There appears to be a miscommunication with the department for us to get notified. We bring this up as a concern being a member of the general public; we do not keep up on all of the timber sales that going on with the state. But we are very concerned about the one that is happening in our own back yard.</p>	<p>process and ancillary efforts with the community.</p>
<p>Teresa Keneko</p>	<p>Note: Many of the residential subdivision parcels have structures that are legally located on the property line with no requirements for setback easements. The number and configuration of residential property parcels which border the timber sale as shown on the FLUP is not accurate and does not reflect the recorded plat. (See DNR recorded Plat #2011-6, Petersburg)</p> <p>ii. In particular, in review of Appendix A2, SSE- 1378 K, Whale Pass Timber Sale, Map 1 Units 1,2,3, the noted “Proposed Cable Harvest” site 125, is adjacent to not three (3) residential properties as shown erroneously on the FLUP as Lots ‘13, 14, and 15” but are plated and recorded with the Alaska Department of Natural Resources (DNR) over ten (10) years ago as eleven (11) separate properties which will be detrimentally impacted by this cable harvest location. (See DNR, recorded Plat #2011-6, Petersburg.) Several homes are dangerously within striking distance of this cable harvest operation. This dangerous proximity situation should be addressed by an Environmental Impact Report (EIR) or environmental assessment document.</p>	<p>The DOF utilized the best available public information layer to depict the extent and configuration of private property. The DOF utilized the Division of Mining Land and Water’s digitized state subdivision plat to base this illustration. The specific nature and occupancy of the land (structures, etc.) was not portrayed on the FLUP maps as we are not authorized to manage or are we configured for tracking that level of residential detail. Without a centrally maintained source of information (typically provided by a local platting and zoning authority), a definitive representation of ownership within the original state subdivision and current building occupancy was considered outside the scope of the project. To mitigate this situation, we have used aerially imagery in the process and on the maps. Our work is based on the long-term perspective that the existing private ownership has residential structures of value regardless of the setbacks and these will increase in density over time.</p> <p>Additional documents recorded with the State Recorders Office such as Plat 2011-6 were examined during our planning process. We recovered most of the survey monuments associated with the recorded surveys along the state property line and observed the location of the structures in that process.</p> <p>The DOF has buffered the subdivision to provide a transition zone. Wind through may or may not occur in this area due to many variables regardless of whether the state removes the timber.</p>

Commenter	Comment	Response
		<p>The DOF regularly considers removing or authorizes the removal of timber on its land that it has been made aware is a hazard. The DOF will work with adjacent landowners during the timber sale or in the future to authorize an owner to cut or remove the timber if the owner asserts State owned tree(s) are hazards relative to their property.</p>
<p>Whale Pass Community Comments via City of Whale Pass</p>	<p>Much more could be said about how our community was devastated by COVID like so many others, right in the middle of the process of public input- at one time there was 40% testing positive here. The legal process marched on not taking into consideration the setbacks we were experiencing due to mandates and requirements made on public gatherings. This timing of the last meeting took place as residents were still dealing with the effects on record snow fall and many had not returned to their homes after the unprecedented winter.</p>	<p>The DOF participated in two (in-person) meetings within the community hosted by the City of Whale Pass. These meeting were well attended. We also participated in a Zoom meeting prior to significant field design efforts as part of our Five-Year Schedule of Timber Sales.</p>
<p>Point Baker Community Association</p>	<p>Old – growth forest sequester carbon and are vital in mitigating the effects of climate change.</p>	<p>It is the DOF’s perspective that the management of forests, a part of which may be their harvest and use, is appropriate regardless of the need to sequester carbon. While old growth timber has significant carbon in it, young growth timber generally sequesters carbon at a higher rate than old growth timber. Provided that the timber harvested is utilized for a period, the net effect is similar to existing conditions and may depending on the viewpoint of the observer, actually sequester more carbon.</p>
<p>James Mackovjak</p>	<p>The area proposed for logging contains an average of only seventeen thousand board feet per acre. This is marginal stuff, and should be allowed to stand, to be wildlife habitat, an attractive viewshed, and to sequester carbon.</p>	<p>Comment noted, no change made.</p>
<p>SEACC</p>	<p>The DOF should reconsider the sale altogether due to a complete lack of financial data. There</p>	<p>The DOF has sold all timber sales that it has offered in the past two decades in southern Southeast Alaska. Timber sales</p>



Commenter	Comment	Response
Page 2	is no supporting evidence in the BIF documents or the draft FLUP that the state's economic objectives are possible or warranted based on current and expected timber demand.	have supplied meaningful employment in Southeast Alaska for decades.
SEACC Page 8	The State should reconsider the entire sale as uneconomical and inappropriate in terms of location and proximity to municipal resources.	Comment noted, no change made.
Richard Etheridge	I am writing in support of the Whale Pass Timber Sale (SSE-1378-K) I appreciate these small scale timber sales. These sales keep this dying industry in operation. As someone who buys lumber directly from mills in southeast. I appreciate supporting our local economy. I have done post timber sale compliance inspections and have worked with logging companies. I have found them responsible and stewards of the environment.	Comment noted, no change made.
Don Habeger Executive Director First Things First Alaska Foundation	<p>Adopting the plan to accomplish the plan's stated objectives is sound.</p> <p>First, the plan acts on the constitutional mandate to develop Alaska's renewable resources. Second, the timber sale adds to the State's resources through stumpage fees. Third, the plan adds jobs, wages, and business opportunities in Southeast Alaska. The third objective is critical, especially after the precipitous loss of employment and business opportunity caused by the COVID pandemic.</p> <p>Finally, the plan mitigates environmental concerns through State review and oversight of the harvest area. This includes, at a minimum, involvement by the Alaska Departments of Natural Resources, Fish and Game, and Environmental Conservation. The harvest, therefore, will be conducted within Alaska's</p>	Comment noted, no change made.

Commenter	Comment	Response
	statutory and regulatory framework that rightly balances economic activity and renewable resource protection for future generations.	
Joe Kahklen President of First Things First	As president of First Things First I wholeheartedly support the Whale Pass timber sale.	Comment noted, no change made.
Tom Boutin	I have read the material you provided and I very much favor this timber sale. I support professional forest management on every acre of publicly owned forest land, including this timber sale.	Comment noted, no change made.
Marc Martinsen	I am in full support of this sale. I have hunted and fished in this are as well as hundreds of places in Southeast in the past 60 years. Logging creates habitat for deer, moose, bears, everything. Landslides happen in areas with larger trees not clearcuts. I have seen all this, lived it.	Comment noted, no change made.
Patricia Welch	Many in this community heat primarily with wood. Being able to salvage with easy road access could be a real blessing for many. That would mean that the roads be left open, not water barred as soon as harvesting was done. Could there be a time period set for the community members to collect firewood?	Comment noted, no change made. To the extent conditions and agency funding allow, the DOF intends to leave sections of the newly constructed roads open for a period of time for the purpose of gathering personal use firewood.
Pam and Matthew Beck	Another area of interest for many in the community is the collection of firewood after harvesting is finished. On September 26, 2022, Greg Staunton attended a Q&A in Whale Pass regarding this sale. During the meeting he mentioned that he had worked with other communities allowing for a time period for the collection of firewood. Many in our community use this as their main source of	

Commenter	Comment	Response
	<p>heat and would benefit from having easier access to what may not be marketable timber but would heat a home nicely. We would request that this be added as condition of this sale.</p>	
<p>Carol Dejka</p>	<p>I support a sustainable harvest for all resources in Alaska. I would propose a buffer of 50 miles or more around each community in SE Alaska to preserve subsistence resources. When the US Constitution began with the words, 'We the people,' I have no doubt that those words meant all of us united together. Clear cutting in a town or village does not respect 'We the people', but defers to the people who can pay to get laws and licensing for their economic profits, and leaving the mess of scab lands behind.</p>	<p>Comment noted, no change made.</p>
<p>Randy and Crystal Toman</p>	<p>As Whale Pass resident I plead with you to abandon the idea of logging units 1,2,3 in Whale Pass. This is a very bad decision that did not consider the lasting effect on the residents nearby, or you did not care. Putting the almighty dollar before the minimal benefits does not align with the governor's slogan "people first"!</p> <p>I know you have heard all the arguments of damage to viewsheds , water source and safety issues. By now if you have not heeded our pleas, I doubt you plan to, but I still must ask, please reconsider and find away to show compassion and drop the part of this sale that so negatively effects a vulnerable community in so many ways. This is only 290 or so acres with estimated income of \$5000,000 according to nearby logging ventures.</p>	<p>Comment noted, no change made.</p>

Commenter	Comment	Response
June Yamrick	Logging 600 old growth trees in Whale Pass will create approximately 50 culverts impacting the last remaining salmon streams. Your organization should respect the value of trees. Trees play a key role in climate change and dramatic weather events, they buffer heat and wind, reduces home heating and cooking costs and stabilize soil. Trees provide habitat for birds and animals. I urge you to stop the sale of Whale Pass.	Comment noted, no change made.
<b>Safety</b>		
Shaun McGraw	While not surprised that the safety and well-being of a community would take back seat to making a quick dollar, I still strongly suggest that the clear-cutting of forest directly above peoples houses should be removed from consideration. Regardless of where the bedrock may be, it still greatly improves the chances of landslides occurring. I recommend putting the residents of our island above the profits from exporting our islands resources.	Comment noted, no change made.
Dave Roberts Alaska Fish Tales Lodge	Another issue that is of concern is the traffic from the logging trucks. Hopefully there is a plan in place that keeps the trucks away from the residential areas. The roads are barely sufficient for two regular vehicles to pass not to mention vehicles towing boats. Children and adults alike use the roadways as walking paths, and travel as well as regular vehicles. I understand that the truck drivers get paid by how much is delivered to the log yard but it is not worth the safety of the residents of Whale Pass.	Comment noted, no change made.  The DOF has not represented the haul route as occurring on the Neck Lake Road segment of the 3000 Road. The DOT has budgeted and plans to upgrade most of this road from the pavement through the community regardless in the next two years for two-way traffic. The DOF will not authorize hauling timber south past the Whale Pass LTF as it is currently configured. Regardless, scoping conversations with potential purchasers indicate wood would likely be moved by barge out of the El Capitan or Whale Pass log transfer facilities. The haul route is expected to exit the community on the 2000 Road to El Capitan; this route would minimize the traffic in the community.
City of Whale Pass Resolution 22-09-20-02	Whereas: the commercial haul traffic from log trucks pertaining to the proposed timber sale	The road within the community is classified by the USFS for

Commenter	Comment	Response
	<p>(SSE-1378K) along the Neck Lake Road, with its single lane and multiple blind corners, and is the only year round and maintained route through the primary residential district of the City of Whale Pass would constitute “reckless endangerment” (Alaska State Criminal Code 11.41.250) to people driving those primary thoroughfares, and pose risk of injury and death to residents, visitors, pedestrians, senior citizens, and especially children on bicycles.</p>	<p>commercial two-way traffic except for the bridges. Adequate traffic pullouts are present on the road for functional two-way traffic. The purchaser will be required to obtain a use permit from the USFS to haul on these roads. Maintenance of the roads features for safe travel is a typical requirement of the permit.</p>
<ul style="list-style-type: none"> <li>• James Greeley</li> <li>• Gary Bull</li> </ul>	<p>The current proposal (SSE-1378K) authorizes use of USFS roads throughout our community. This potentially allows log truck traffic to operate through residential areas of Whale Pass. The road is a thoroughfare to community hubs and is largely one lane, contains multiple blind curves, and multiple one lane bridges. The increased traffic pertaining from the sale from the haul route through the community would pose significant danger to the citizens, children, tourists and pedestrians traveling the road. An accident would realistically constitute as “reckless Endangerment”</p>	
<p>Whale Pass Community Comments via City of Whale Pass Mayor</p>	<p>Residents also express concern for safety on their roads. Whale Pass is the last community on the North end of Prince of Wales Island road system, but the 8 miles to town have not been yet paved and largely consists of single lane with many blind corners, narrow bridges, and limited pullouts. The steep terrain has many drop offs, often along water. With the majority of the population being elderly and children, there is grave concern for safety as residents also use these roads for walking and bike riding on a regular basis.</p>	<p>The Neck Lake Road is scheduled to be widened and paved by ADOT starting in 2023. The timber sale is not likely to use the Neck Lake haul route. Please see the BIF for discussion of the haul route.</p>

Commenter	Comment	Response
Patricia Welch	<p>I have lived in this community for over 30 years and remember during other logging times, you could not get out of your driveway due to traffic. You would have to listen in on a CB radio in attempt to hear where the trucks. Then taking your life in your own hands, get out on the road and pray there were no trucks coming. The community has grown since those times and there are now many young families with children and many senior citizens. What can be done for the community regarding traffic: Can truck speeds be reduced? Can the travel direction be done in a circular path? I do not believe the plan for traffic flow has been completed as of yet. Safety for all involved must be considered as a major part of this plan.</p>	<p>Your concern is noted. Please see the BIF for discussion on traffic safety. Vehicle traffic on public roads is required by statute to drive in a manner appropriate to the conditions. Log trucks are no exception. The timber purchaser will submit a safety and communication plan as part of their operating plan which is required in the state timber sale contract and is subject to the approval of the DOF. The DOF through contract administration will also provide oversight. As a public road, other avenues of compliance are also possible through law enforcement.</p>
Pam and Matthew Beck	<p>The community of Whale Pass is situated on a USFS forestry road. Gravel surface, mainly 1 lane traffic, with many blind corners. Current speed is posted at 25 miles per hour, but many drive much faster. Who will enforce the Log Truck speed? Can a slower Truck speed be proposed when driving (both loaded and empty) on the main thoroughfare in town? Are there hours of operation that can be set? If logging is done during the drier summer months, is there a mandate for the road to be watered down to help to eliminate dust. Many people, young and old, walk along the main road in town, people also ride bikes, and meeting up with a log truck on blind corners could result in a potentially dangerous situation for all involved, both physically and mentally.</p>	
Teresa Kaneko	The only existing road in Whale Pass is a	

Commenter	Comment	Response
	<p>single lane, compacted soil and gravel base. All the Pre-school through 12th grade resident children use this road to walk or ride their bikes to attend the Whale Pass school which will require these children to “share” the road with not only the regular vehicular traffic but proposed now with timber operation and harvest equipment. This dangerous impact to public safety requires an Environmental Impact Report (EIR) or environmental assessment document.</p>	
Teresa Kaneko	<p>The only convenience store and church in Whale Pass are located in the residential subdivision that borders this timber sale and will be detrimentally impacted by this. Once again, it is critical to provide an Environmental Impact Report (EIR) or environmental assessment document.</p>	
Teresa Kaneko	<p>Special consideration needs to be established under the Americans with Disabilities Act of 1990 (ADA) for several residents in this residential subdivision bordering this timber sale area who are disabled and housebound. Critical mitigations are required to monitor and maintain existing:</p> <ul style="list-style-type: none"> <li>a. Water quality, quantities, and flow rates</li> <li>b. Noise levels, and hours of operations</li> <li>c. Air quality including but not limited to noxious odors, dust, and debris.</li> <li>d. Blowdown of trees</li> <li>e. Close proximity to Proposed Cable</li> </ul>	

Commenter	Comment	Response
	Harvest areas	
Joe Demonico	It's amazing you would put an entire community at risk for a tract of so little value. What's even harder to comprehend is your unwillingness to compromise in any way. I have walked the hills behind some of my neighbors' properties and the 100' buffer zone is hardly sufficient. There is more muskeg on that hill side than timber. Have you walked the tract yourself or was the board feet an aerial estimate? I leave you with just one question, is this right?	Comment noted, no change made. The timber sale feasibility was initially scoped and reviewed by a consulting firm with significant forest engineering experience in Alaska and the Pacific Northwest. The timber sale in this FLUP was designed in the field by division staff. The timber cruise was performed by a consulting timber cruiser with extensive experience in Southeast Alaska.
	<b>Harvest Systems/ Roads</b>	
Santiago of Southeast Ak	Please do not clear cut the Whale Pass forest.	Comments noted, no change made.
Jan Conitz	The time for clearcuts in any old-growth area of the Tongass Forest has passed.	
Jan Conitz	I am particularly concerned about the inclusion of old-growth yellow and red cedar in the logging plan. The State of Alaska has advertised the timber involved as being "marginal" or of mixed, deliberately obfuscating the existence of the cedar species which are obviously very valuable. Yellow cedars in the Tongass Forest are particularly threatened due to climate change, and should be completely off-limits for logging. They should also be protected from indirect threats such as clearcutting adjacent watersheds, which will result in more exposure and thus greater threat to their survival. The plan appears designed to invite high-grading of the best timber, which is apparently valuable enough to offset the cost of getting rid of the lower quality trees.	Yellow cedar as a species was examined by the USF&W for inclusion on the threatened list of species and it was discerned that it was being influenced by climate shifts but was not threatened or endangered.  The DOF has represented the timber type in contemporary terms used in the timber trade. The timber sale was identified and developed based on observed markets and economic constraints. All timber stands have non-merchantable components. Merchantable timber will be defined in the contract and utilized by that standard.



Commenter	Comment	Response
<p>SEACC Page 5</p>	<p>The analysis in both the BIF documents and the draft FLUP has been artificially constrained with regard to the harvest method. Originally, plans to log this area as stated in the Five Year Schedule of Timber Sales (FYSTS) for the Southern Southeast area included the use of helicopter logging, which would mitigate and minimize damage to watersheds, road building, and other resource impacts. In the most recent FYSTS documents, the state responded to comments about helicopter logging by identifying that it doesn't have the timber volume necessary to employ this method and that no helicopter logging outfits were available in the area. The DOF has omitted helicopter logging as an option in this area simply because it cannot afford to employ this method of logging. However, this is not adequate reasoning to eliminate helicopter logging as a viable method of timber harvest. If the state cannot produce a timber sale that is profitable while employing appropriate site-specific methods of extraction which protect other resources in certain locations, it should omit those areas from logging plans. All units identified for cable logging in this sale plan should be omitted.</p>	<p>All harvesting systems are constrained by costs and projected revenues. Helicopter logging is on the high end of the spectrum for cost. Helicopter logging takes highly specialized personnel and is very labor and capital intensive. Because of this, the application is judiciously applied. Several strategies can be employed to mitigate cost such as distributing mobilization costs over larger volumes and changing utilization requirements. It is the state's observation that on this land base it does not have sufficient volume to justify the mobilization cost of a helicopter system. Wood utilization practices are typically adjusted to reflect the higher logging cost of a helicopter such that timber revenue pays for the removal cost; this diminishes the overall amount of timber recovered. The method is well suited for isolated timber in that light and has been generally used on private land where other options are not achievable and there may be a concerted need for revenue. It is the assessment of the DOF that the cable logging methods prescribed on this sale are appropriate to the conditions. Cable logging does not inherently harm other resources. Like a helicopter, cable logging is becoming increasingly harder to facilitate (although it is still available as an option in the region) than mechanical systems such as shovel logging due to the availability of the specific equipment and knowledgeable and skilled personnel.</p>
<p>Scott Hixon</p>	<p>Inadequate landings/ cable harvest sites on recently proposed latest Timber Harvest Plan allowed inadequate time for evaluation of potential impacts to adjacent private property in the site selection. (<i>Landings</i>) should have been provided earlier in the process (Stage 1-2, rather than the final Stage, to allow evaluation of impacts to the community of private properties and potential hazards that exist.</p>	<p>The concern for concentrated activity such as yarding termination points (landings) is a consideration in planning. Landings are not required to be explicitly identified on the FLUP. In its discretion, the DOF requires purchaser operating plans to address the harvest system and landing management. Landing location is a product of the specific systems employed. Landings are managed in the FRPA using BMPs. These are relatively small cable logging settings, the possible variation in their locations is limited at</p>

Commenter	Comment	Response
	<p>Consideration should be given to relocation of all landing/cable harvest sites that are proposed, to be established in areas adjacent to all private property during timber harvest period and after. Suggestion: Relocate/ remove all landings/ cable harvest sites in adjacency to private property/ homes to 1200 ft. or more if applicable. If a resolution buffer can not be established, I feel and Environmental Impact Study (EIS) should be conducted on each individual property adjacent to the harvest area and Environmental Impact Report (EIR) should determine what action measures be taken to insure protection of Property/ home/ public.</p>	<p>this point. Cable landings on this type of terrain are not predicted to be a significant risk to other resources such as residential structures.</p> <p>The projected cable landing locations for Unit 125 is approximately at point P819.</p>
<b>Water Quality</b>		
<p>City of Whale Pass Resolution 22-09-20-02</p>	<p>Whereas: due to a lack of public water infrastructure, residents of Whale Pass rely on subsistence watersheds near homes for their water and sewer needs, the disturbance and erosion of soil caused by the proposed timber harvest (SSE-1378K) would inevitably degrade sourced watersheds that nearby residents below and adjacent to the timber sale boundaries rely on due to the absence of any municipal infrastructure.</p>	<p>The DOF has examined the potential changes to residential areas relative to the proposed timber sale and discerned the risk to the homes and resources is low. The best management practices of the Alaska Forest Practices Act and Regulations will be employed and have a track record of maintaining long term water quality.</p> <p>Water quality and peak flows will be like the existing conditions in the surface drainages. Regardless, the use of uncontrolled surface water sources has inherent risks for domestic use and is not recommended by DEC.</p>
<p>Rep. Dan Ortiz</p>	<p>Whale Pass is Alaska’s newest established city as of 2017 and does not yet have the infrastructure needed to provide utilities such as water and sewer. Residents rely on naturally occurring resources. However, clearcutting the land above their homes would negatively impact the watersheds those households primarily rely on.</p>	<p>While the harvest of timber influences run off timing from the landscape due to changes in interception and transpiration rates, peak flows of surface waters are not expected to be significantly higher volume that currently reach the subdivision.</p>
<ul style="list-style-type: none"> <li>• James Greeley</li> </ul>	<p>Many of the homes adjacent to proposed units</p>	

Commenter	Comment	Response
<ul style="list-style-type: none"> <li>Gary Bull</li> </ul>	<p>1,2, and 3 rely on personal subsistence watersheds originating above their homes. The inevitable erosion of soil due to logging beyond the minimal proposed boundary adjacent to private properties will significantly degrade a sustainable water supply for many.</p>	
Teresa Kaneko	<p>There is no city water system in Whale Pass, AK; most of the residents in this residential subdivision have historically used water obtained from the existing water streams, creeks and underground springs with some of the parcels having recorded water right permits. Any impacts to the water quality, quantity and flow rates will adversely affect these residents.</p>	
Whale Pass Community Comments via City of Whale Pass	<p>Many homes below the track of land in question rely on the watershed from the forest above as their primary household water source. As Alaska's newest city established in 2017, Whale Pass does not have the infrastructure to provide utilities such as water and sewer.</p>	
SEACC Page 2	<p>The DOF should prepare a new draft FLUP that includes significant mitigation measures for resources of concern identified during the public process, including retention in several areas and omission of logging on lands classified as Settlement (outside the Southeast State Forest boundary in the project area), and increased buffer distances close to residential property and streams which are used for human consumption.</p>	
Dave Roberts Alaska Fish Tales Lodge	<p>With the amount of rain that southeast Alaska receives, there is also a very high probability that runoff and watersheds will become a problem. Not only will homes be in more</p>	<p>The current surface water drainage structures on the USFS road system within the community are expected to handle future surface flow conditions.</p> <p>The timber purchaser will maintain the road during active</p>

Commenter	Comment	Response
	<p>danger, the maintenance costs to the community will rise.</p>	<p>hauling operations. Maintenance activity on the road by the timber purchaser will reflect the use on the road by the timber operations.</p> <p>Many of the residential driveways throughout the community currently convey water via their surface to the public road. This in combination with the depreciated road conditions (poor ditch line connectivity to relief culverts, etc.) retard water movement off a road. This water on the road typically is responsible for degraded road subgrades which is a significant cause of potholes and road surface degradation.</p> <p>The ADOT is scheduled to upgrade the road and drainage structures starting in 2023 as part of improving the drivability of the road.</p>
<p>Scott Hixon</p>	<p>Could a minimum buffer of 300 ft. or topographical ridgeline or other be considered?</p> <p>Suggestion of at least a minimum of 300FT buffer to all private property, which are directly adjacent to the harvest area: greater than 300ft. may be required in areas of steeper slope, land with stability issues and defined drainage areas.</p>	<p>Based on the intent of the SESF and the other land classification present, the DOF has prudently located the unit line relative to constraining resource features.</p>
<p>Pam and Matthew Beck</p>	<p>We would like to request extended buffers of 300feet along the property line.</p> <p>The small stream on our property from which we pull water, contains fish, mostly small, but it is not uncommon to see returning salmon in our stream. Having 300 -foot buffer along our stream and watershed would help to protect both our water and the fish that live and migrate. A larger buffer would help eliminate some potential issues by but limited to water quality, flow rate, diesel or other substance spills that are unfriendly to the water and/or</p>	

Commenter	Comment	Response
	the environment.	
Teresa Kaneko	1) Detrimental impacts to the multiple existing Anadromous Streams, the Water Quality Watershed and surrounding existing Residential Properties require an Environmental Impact Report (EIR) or environmental assessment document to properly address the timber sale impacts and possible mitigations.	The DOF addresses the projected impact to these resources in the Best Interest Finding and as appropriate avoids, minimizes, and mitigates the resources through the actions described in the Forest Land Use Plan. Harvest activity is further governed by the purchaser’s operating plan subject to approval of the DOF.
Teresa Kaneko	The protection from any impact of antidegradation from sediments and hazardous materials to the watershed is a critical oversight requirement of the Alaska Department of Environmental Conservation (DEC) a document.	<p>The DOF works with DEC as part of the Alaska Forest Resources and Practices Program regarding these topics. Regardless, the DEC exercises its authority as required by the situation.</p> <p>The DEC responded to your concern as follows:</p> <p>“the term “antidegradation” in comments. This is a term that is specific to the federal Clean Water Act. Per federal and state regulations, upland timber activities outlined in the proposed project are not required to obtain a wastewater discharge permit under the National Pollutant Discharge Elimination System (NPDES) program whose implementation authority has been assumed by the Alaska Department of Environmental Conservation. Thus, this project will not be subject to Antidegradation requirements in Alaska regulations at 18 AAC 70.015 and 18 AAC 70.016.</p> <p>As noted in the FLUP, this project will be subject to AS 41.17.118(a)(1)(A), Forestry regulations adopted at 11 AAC 95, application of Implementing Best Management Practices of Timber Harvest Operations (2017), and regular inspection by state agency staff (ADF&amp;G, ADEC, and ADNR). Per the Forest Practices Act, existing regulations and implementation practices should result in the protection of all use classes identified in state water quality standards at 18 AAC 70.020 (a) and 18 AAC 70.050.”</p>

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Teresa Kaneko	The clear-cut of timber will cause quicker water run-off with less absorption and increase the erosion of sediments causing “aniddegration” of the watershed impacting these anadromous streams, creeks, underground springs and adjacent residential properties. These anadromous streams are critical to many current and historic salmon species runs. Existing natural downfall and erosion is already impacting these streams.	The DOF has designed the sale with respect to observed use and specifically has accommodated anadromous habitat. It has avoided planning direct harvest activity in anadromous streams, minimized crossing upstream tributaries and will maintain bank integrity and remove slash and debris placed in the course of harvest activity on all streams regardless of downstream connection to fish habitat or residential use.
Teresa Kaneko	The use of heavy equipment and other motorized vehicles within these areas will result in discharge of hazardous waste materials i.e. oil, diesel, gasoline, coolants, solvents, etc.	While this is possible, significant discharge is unlikely given the pollution control measures typically applied on commercial operations.
<b>Streams/ Fisheries</b>		
Form Comments Ibid: Mel Izard	Approximately 50 culverts and other stream crossing structures are planned, impacting the last remaining salmon streams in the immediate area.	Fish habitat was completely avoided. None of the proposed culverts cross fish habitat. The installations are sized to safely convey predicted flows and will be removed at the conclusion of timber operations and the secondary management goals (recovery of personal use firewood and reforestation actions).  The DOF implements the Forest Resources and Practices Act on all timber sales to maintain water quality and soil integrity. The implementation and effectiveness of the act relative to past and foreseeable conditions is documented in regular reports to the Governor and the Legislature.
Jan Conitz	Another serious concern is the impact of this logging plan on salmon and other anadromous and resident fish species. Approximately 50 culverts and other stream crossing structures are planned. Culverts and crossings are unequivocally bad for fish, and the streams which will be impacted by this plan are the last remaining salmon streams in the immediate area.	
Jan Conitz	We must work to make our forests, watersheds, and communities resilient given the harmful effects of climate change, including increased likelihood of devastating landslides, introduction of new diseases and invasive species, and stream temperature rises	

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	that affect fish.	
<p>Whale Pass School Students</p> <p>M. Cook, Jeremy Vasquez, L Cook., D. Cook, B. Cook, A. Cook, J. Cook, A. Cook, Kiya Toman, Kelsey Toman, J. Toman, T. Cook, J. Toman, T. Toman</p>	<p>Logging practices in such proximity to our town will cause waste and run-off to flow into the town's streams and creeks, damaging fragile salmon spawning habitat and resident's water supplies</p>	
	<p><b>Wildlife/ Subsistence Hunting/ Cumulative Impact</b></p>	
<ul style="list-style-type: none"> <li>• Form Comments Ibid: Mel Izard</li> <li>• James Greely SR.</li> </ul>	<p>Prince of Wales forestlands have already been over-harvested by numerous different federal, state, and private entities. These cumulative clearcuts over a short period of time have had staggering impacts on critical deer habitat. As you know, deer are a key subsistence resource across Southeast Alaska, and I believe this sale will destroy key habitat for deer. The State of Alaska's own harvest reports (Alaska Department of Fish &amp; Game) shows that subsistence harvest is down for several years running in the area, and most Whale Pass residents are subsistence users. Continued old-growth habitat destruction on Prince of Wales is not in the best interest of the state or its residents.</p>	<p>Comments noted, please see the Best Interest Finding, no change made.</p>
<p>Kevin Allred</p>	<p>Wildlife also requires these old growth forests for forage and shelter. Large old growth stands are few and far between on much of Northern Prince of Wales Island, and I notice you are targeting some of larger remaining timber for harvest.</p> <p>And, of course, the damage to wildlife and fish</p>	

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	<p>would exist for hundreds, if not more years, until large old growth could again exist on new soils.</p>	
<p>Jan Conitz</p>	<p>Prince of Wales Island as a whole has been seriously over-harvested already by numerous different federal, state, and private entities. These cumulative clearcuts over a short period of time have had staggering impacts on the ecosystem, the salmon streams, and critical wildlife habitat.</p>	
<p>James Tagart</p>	<p>I am a Sitka resident, but I stand with the residence I will pass an opposing any timber sale. As a hunter I understand the need for intact all growth forest habitat to support a healthy Sitka blacktail deer population. (Sic)</p> <p>Here in Sitka, we get to you hunt six deer annually, and Prince of Wales that number is now down to one annually. The reason is due to heavy logging on the island which limits their habitat. Additionally, my understanding is a roadway need to be built across many salmon producing streams. This also reduces the overall salmon population and availability of this resource for all. (Sic)</p>	
<p>Point Baker Community Association</p>	<p>There is growing consensus among island residents and State a Federal wildlife biologists that all of the remaining old-growth forest around Whale Pass will add to the cumulative impacts of the loss of old-growth habitat on the island-</p>	
<p>Jan Conitz</p>	<p>-deer are a key subsistence resource, and this sale is likely to destroy some of the remaining key habitat for deer. Most of the people who live in and around Whale Pass are subsistence users and clearcutting in the area will</p>	



Commenter	Comment	Response
	undoubtedly result in loss in subsistence resources to them.	
<p>Whale Pass School Students</p> <p>M. Cook, Jeremy Vasquez, L Cook., D. Cook, B. Cook, A. Cook, J. Cook, A. Cook, Kiya Toman, Kelsey Toman, J. Toman, T. Cook, J. Toman, T. Toman</p>	<p>The planned clear-cut will have a severe negative effect on the remaining deer wintering grounds in the area surrounding the 108 Creek estuary. This will decrease the area’s deer carrying capacity for decades. The Bureau of Land Management website states that “When it comes to subsistence harvesting, Alaska is unique among states not only through the traditional practice of living off the land. But because of federal law. Alaska is the only state where the subsistence use of fish and game is given the highest- priority for consumptive use. This happened when Congress passed a priority subsistence law in 1980 for federal lands in Alaska in the Alaska National Interest Lands Conservation Act (ANICLA).” Also, in the most recent GMU 2 Deer Management report written by ADFG biologists, they state that” We should better inform the public regarding the effects logging on deer populations, so that they are aware of tradeoffs between timber harvest and wildlife. We anticipate that logging related reductions in important winter habitat will reduce deer carrying capacity for decades to come. The long-term consequences of habitat loss include loss of hunting opportunity and the inability to provide for subsistence needs of rural residents (Wood 1990, Larsen 1993)” This supports our contention that not only will the clear-cut have negative impact on residents but will also be quite detrimental to the local wildlife.</p> <p>In conclusion, we have no benefit from the proposed clear-cut, and the local wildlife has</p>	<p>Significant habitat remains and is set aside for this purpose on federal land. It is highly unlikely that federal management of these lands will remove productive old growth in the future. This set aside is further augmented by other ownerships including some state areas.</p> <p>Reference to ANILCA authority is only applicable to federal land.</p> <p>Please see the Best Interest Finding for discussion on the treatment of the 108 Creek drainage.</p> <p>Comment is noted, no changes made to the FLUP.</p>

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	<p>no benefit. For such a small (392 acres of poor-quality timber) cut to have such a negative impact on those affected, it would seem that a concession would be possible.</p>	
<p>SEACC Page 1,2</p>	<p>-The Division of Forestry (DOF) has produced an incomplete document that has artificially constrained the analysis and decision on harvest method, fails to address site-specific resource concerns identified throughout the public process, and fails to meaningfully consider cumulative impacts in the area due to near-constant logging across several different land ownerships.</p> <p>-The final BIF states that the FLUP will consider the cumulative impacts in the project area, and claims that the FLUP will also cite specific requirements for multiple-use management, among other factors. However, the draft FLUP makes no mention of cumulative impact. In failing to acknowledge the fact that widespread clearcut logging in the area has already impacted salmon streams, wildlife habitat, and surface waters in and around the project area, the DOF has published an incomplete and misleading document that ignores the cumulative impact of near constant timber harvesting since the 1960s in the area.</p>	<p>Significant timber harvest near the community has not occurred in over twenty-five years. The DOF works with and provides due deference to ADF&amp;G regarding cumulative wildlife impact. The area plans apply this perspective and identify it as an ADF&amp;G function that occurs periodically based on their professional judgement. The ADF&amp;G conveyed in written comment their analysis and perspective:</p> <p>“The proposed timber sale will remove important wintering deer habitat, as well as habitat that other species (e.g. flying squirrel, Queen Charlotte goshawk) rely on. Due to the logging legacy in the area around the timber sale, wildlife numbers may be impacted locally with this additive loss of habitat. Prince of Wales Island received the most substantial logging activity in the region since 1954 (Albert and Schoen 2013). Contiguous forest has been reduced by 77.5% in the northern Prince of Wales biogeographical region since 1954 (Albert 2019) which consequently reduced deer habitat in north central POW by 46% (USDA 2016). Approximately, 360,000 acres of old-growth forest has been harvested on Prince of Wales, and approximately 169,000 acres are currently in stem exclusion with 115,000 acres about to reach stem-exclusion stage (The Nature Conservancy 2018). Stem exclusion provides poor quality deer habitat, as well as poor quality hunting conditions. Some of the areas adjacent to these units were previously clearcut and may currently be in stem exclusion. This timber sale will remove important deer winter habitat, but important deer winter habitat will remain in between these timber sale units. Due to the remaining important habitat in between the timber sale units and the small size of these timber sale units, ADF&amp;G does</p>

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		not have major concerns for impacts on Unit 2 wildlife populations.”
Dr. Winston Smith	<p><i>Smith outlined the genetic uniqueness of the POW flying squirrel and then the apparent traits of the squirrel that dispose of it needing sizeable and connected habitat for long term viability of the population.</i> The result of all of this is that young squirrels have a very low probability of natal dispersal in managed landscapes of north POW and more than 50% of the POG habitat patches (OGRs, stream and shoreline buffers, OG LUD, etc.) are not functionally connected (Smith et al. 2011). The proposed actions in Whale Pass Timber Project will further fragment and isolate POG patches and POW flying squirrel populations, all of which will increase the risk of extinction in managed watersheds of north POW and similarly managed watersheds across its range. Moreover, because of obligate or facultative symbiotic relationships between POW flying squirrels and multiple members of its forest community (Smith 2012a), significant biodiversity is also at risk.</p>	<p>Your comments were provided to ADF&amp;G. The connectivity of adjacent old growth stands will remain like existing conditions overall in the ADF&amp;G Game Management Unit 2. Per ADFG’s request early in the project, we have provided a wildlife corridor in Unit 2. While we are proposing to remove old growth timber that your research indicates may be used by the flying squirrel, it is highly unlikely that harvesting this site will significantly create irreparable harm on POW Island.</p>
Dr. Winston Smith	<p><i>Smith has experience analyzing habitat requirements of the Queen Charlotte goshawk for the USFS in support of Tongass Land Management Plan. He outlined the genetic uniqueness of the Queen Charlotte goshawk subpopulations in the coastal archipelago of the United States along with their overall association with the meta population that is collectively considered endangered and protected in British Columbia, Canada. He then outlines the need for sizeable habitat for nest protection, post fledgling and foraging</i></p>	<p>The capacity to reserve habit by watershed basis or in even a larger context referred to in your comment, addresses planning actions typically only practical on a much larger scale such as on federal ownership.</p> <p>Your comments were provided to ADF&amp;G and were acknowledged.</p>

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	<p><i>area. He infers that the existing habitat has been fractured and significantly reduced by the USFS past management to the point that the species is stressed. Retaining productive old growth habitat on a watershed basis may be critical for long term viability of the population versus relying on a core undisturbed habitat reserve augmented by other incidental land management classifications that may see other dispersed uses (timber harvest, etc.).</i></p> <p>Since the analysis was completed in 2006, the Big Thorne Timber project harvested an additional 6,000 acres of productive old-growth forests within the Queen Charlotte Goshawk range on Prince of Wales Island. Additional POG has been harvested on federal state lands near Naukati and in other portions of north-central and northwestern POW. Further harvests of POG will further reduce goshawk breeding habitat and potentially result in the POW population becoming added to the current listing as a threatened subpopulation with all the accompanying restrictions.</p>	
	<b>Erosion/ Landslides/ Soil</b>	
Mike and Tyra Huestis	<p>Some of the land is very steep where the proposed sale is currently laid out and there is legitimate concerns for and slides in those areas. Prince of Wales Island experiences landslides almost every year, and usually (although not always) in areas that have been logged.</p> <p>I do not feel that it is in the best interest of either the residents or the State for that particular area to have the timber harvested.</p>	<p>The DOF addressed site stability overall in the BIF. Slopes above 50% are identified categorically in literature and in the FRPA regulations as a threshold to consider for soil stability regardless of the specific activity or their soil composition. The steeper areas uphill of the subdivision are defined by prominent bedrock emanating through a thin layer of organic soil. Bedrock and organic soils were assessed as stable; observed soil and material movement was observed to be localized and appeared associated with tree turnover from windthrow. The steeper areas on this sale are</p>

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	<p>The risk to personal property, and the possibility of legal action against the State if landslides should impact private property and lives makes this a financial risk, simply because litigation could end up costing the State more than the revenue gained by harvesting the timber from this small portion of the sale.</p> <p>Obviously, the “safest” option would be to not harvest in the proposed area adjacent to the subdivisions. But, there could be a compromise reached where steep slopes above private property, with “buffer zones” of 500’ or more placed between the sale and the subdivisions.</p>	<p>relatively limited in reach (length of slope) and area. It is our assessment that the downhill risk is low, as the rock is solid in composure under the vegetation.</p> <p>The west side of Unit 2 (Snoose Creek) and the very north side of Unit 3 and Unit 4 have approximately two feet of depth composed of glacial and sedimentary material on bedrock; these areas are removed from the subdivision. Regardless it was discerned by DOF that the recovery of timber in these areas also posed a low soil movement risk.</p>
Rep. Dan Oritz	The proposed 100-foot buffer zone also worries residents about the potential for wind throws and landslides directly above their homes.	
Teresa Kaneko	<p>3) Instability of soil will damage property.</p> <p>a. The clear-cut timber will cause quicker water run-off with less absorption and increase erosion of sediments.</p> <p>b. The topography is steep in many sections and has already eroded in many areas creating an unstable base.</p>	
Patricia Welch	I would like to request larger buffers. The current plan calls for 100 feet, I do not feel this is enough, and would like to request that all buffers along residential properties and fish streams be increased to 300 feet. Larger buffers will help with potential damage to mine and others property by allowing more space for wind throws, blow downs, damage	

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	<p>from landslides. A larger buffer would also help with any diesel or other substance spill that may happen during preparation for cutting and while harvesting is being done.</p>	
<p>City of Whale Pass Resolution 22-09-20-02</p>	<p>Whereas: residential homes and properties that are closely located along the minimal proposed buffer zones of 100 feet and adjacent to slopes with the timber sale (SSE-1378K), are vulnerable to damage from windthrows, blow downs, erosion and landslides, unsafe conditions during an after timber harvest and significant damage can occur will into the future.</p>	
<p>SEACC Page 4</p>	<p>-The draft FLUP does not include detailed site-specific information about areas where building on steeper slopes will be necessary but refers generally to the necessity to build “several” fully benched short sections of road on steep grades.<sup>9</sup> Deferring to Best Management Practices or Alaska Forest Resources and Practices Act (FRPA) requirements does not eliminate the responsibility of the state to clearly define site-specific descriptions or mitigation measures. The draft FLUP states that: “there are no indicators of unstable areas where roads will be constructed.” However, it allows for logging at least one area where soil movement and instability were observed.</p> <p>-Unit 134 appears to have been designated for cable logging in the draft FLUP. It should be omitted entirely due to the fact that the soils in the area have been identified as unstable, the area lies above residential property on steep slopes, and the area drains directly into an</p>	<p>The DOF has updated the FLUP to specifically indicate the areas of steeper slopes traversed by the roads in Section VI. B (Side Slopes/ Mass Wasting) and an information category on erosion has been added in the timber harvesting and unit information. The soil instability indicators observed are referenced. Specific mitigation that will be required by DOF is described.</p> <p>The soil movement observations referred to in the BIF and FLUP in Unit 134 do not lie along the fall line to the subdivision; organic soils and elements of the clay and coble soil type in Unit 134 are presently surface migrating from several exposed notches in the hillside. The interface along the hard clay layer is providing a conduit for subsurface water to follow the layer and then exit on the slope break. The timber on this edge is naturally wasting through this continual process. Catastrophic movement is not expected with this landform. The risk to fish habitat is not projected to change with the proposed activity.</p>

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	<p>anadromous stream.</p> <p>It is arbitrary to designate trees for harvest based strictly on economics without looking closely at safety issues.</p> <p>Extend the sale boundary to 600' behind Whale Pass residential area in Units 2 and 3.</p> <p>Eliminate logging on all slopes greater than 50%</p> <p>Areas designated for cable logging should not be logged</p>	
<ul style="list-style-type: none"> <li>• James Greeley</li> <li>• Gary Bull</li> </ul>	<p>Our home and property are closely located along the minimal buffer zones (currently proposed at only 100 feet) and is adjacent to a steep slope within the timber sale. A clearcut this close to our home will make us vulnerable to damage. <i>The area described as being vulnerable: Lots 11,12, 13, 14 &amp; 15.</i></p> <p>Disturbance of soil from heavy equipment of logging and the removal of root systems will inevitably create soil erosion resulting in windthrows, blowdowns, and landslides.</p> <p>“increase buffer zones to 600 feet to adjacent property boundaries and subsistence watersheds, eliminate the plan to cable harvest (Zone 125) and eliminate the plan to clearcut between the proposed road route on the slope located above adjacent property boundaries (Lots of 11, 12, 13, 14 &amp; 15), or abandon the project.”</p> <p>What is most concerning is the change in water flow coming down the hill from the muskeg above in addition to the threat of potential landslides from heavy rainfall and high winds</p>	<p>The DOF has buffered the subdivision to provide a transition zone from the harvesting activity. Windthrow may or may not occur in this area due to a variety of variables regardless of whether the state removes the timber. The DOF has chosen to retain timber against private property to mitigate wind disturbance and visual concerns to private property.</p> <p>The DOF will in its discretion, consider removing additional state timber during the timber sale if the adjacent land owner communicates to the DOF that the State-owned tree(s) are hazards relative to their property. The DOF typically will also work with adjacent landowners to authorize the removal of state timber that is mutually determined to be a hazard to the private landowner.</p> <p>Increasing the buffer is not appropriate for the land classification. The DOF has looked at the site with the perspective of risk from windthrow, erosion and mass soil movement (landslides). It is our assessment that these are low risks at this location.</p> <p>Cable harvesting was designated as the appropriate tool to harvest the timber in a controlled manner. Safety, communication of operational hazards is a standard of all our operations and required in the timber contract. Specific</p>

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	that often occur from the north.	
Teresa Kaneko	<p>2) The typical one hundred (100) foot to three hundred (300) buffer zone between the clear-cut area and the adjacent residential subdivision is not adequate.</p> <p>a. Due to the prevailing wind direction, steep topography, and known historic record of tree blowdowns in the area after sections of trees have been cut, the typical one hundred (100) to three hundred (300) feet buffer zone will not be enough distance to prevent the blowdown of these buffer trees onto adjacent residential property. Current Plat map shows additional recorded properties. (See DNR recorded Plat #2011-6, Petersburg) Therefore, there is high potential for personal injury, loss of life or damage to property should a catastrophic tree blowdown take place with these trees within the 100' buffer zone.</p> <p>b. The close proximity of designated "Proposed Cable Harvest" areas located above bordering residential homes on steep terrain needs to be addressed by either an Environmental Impact Report (EIR) or environmental assessment document.</p>	communication requirements regarding harvest activity proximate to private land ownership is required for the areas bordering the subdivision.
	<b>Karst</b>	
<ul style="list-style-type: none"> <li>• Form Comments Ibid: Mel Izard</li> <li>• James Greeley SR.</li> </ul>	-and will impact the karst lands (which serve as a network of underground, interconnecting fissures and cavities that transport nutrients throughout the old growth forest) on the north end of the island.	Comment noted, no change required.
Kevin Allred	-A huge amount of logging has already impacted this area already, and much of it has been concentrated on karst lands. When trees	Comment noted, no change required. The DOF examined USFS data and field reviewed the units and roads at a level to be aware of karst features and associated topography that



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	<p>are removed and ground is disturbed, valuable soils are transported directly sub-surface, and lost.</p> <p>I personally know of several caves in the areas that are considered for timber harvest, and it is likely that there are others. One of these caves has sub- aqueous speleothems unlike any other that I have seen documented anywhere.</p> <p>-I recommend that at a minimum, the State does a thorough job of first ground-checking the planned cut units for caves and karst features and eliminating those areas from timber harvest. If the entrances of caves are destroyed or filled during logging, these resources are no longer accessible for study or recreational caving by people including myself.</p>	<p>might warrant specific avoidance or mitigation. Cave entrances and other sensitive features were not observed.</p>
Kevin Allred	<p>Another result of clearcutting on karst is that the moist cool conditions of old growth forests are lost, and the exposed ground is more subject to flooding, and then drying and warming during dry periods. This impacts the salmon streams with warmer temperature waters in which the salmon cannot survive.</p>	<p>The DOF will implement the Forest Resources and Practices Act to maintain water quality and soil integrity. Comment noted, no change required.</p>
	<b>Scenic/ Visual</b>	
Form Comments Ibid: Mel Izard	<p>Finally, the State is insisting on logging close to residential property and within town limits, ignoring the town's pleas for consideration of their growing tourism niche and property values. With this plan, the FLUP for Whale Pass doesn't consider visual resources or mitigation measures for the Whale Pass area.</p>	<p>Comments noted, no change required.</p>

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Michael Wald	<p>Just a quick note to let you know that lots of people across Southeast oppose the big old growth cut being proposed in Whale Pass. Tourism will bring a lot more revenue to our region than clear cuts can.</p> <p>Sure go ahead and pick out some of the nice timber but you gotta leave that town looking good for visitors.</p>	
Shereen Baker, owner Lot 11, Whale Pass	<p><i>(Letter to Commissioner)</i> I highly encourage you to visit to fully understand the massive scenic devastation this sale will cause to the City of Whale Pass for many more years than the 5/10/22 report claims. I understand Whale Pass began as a logging community more than forty years ago but over the years has changed to a tourist and fishing lodge community. This timber sale will not only hurt us economically from the scenic devastation but will also affect the Whale Pass community's safety during the logging and well-being for many more years to come. My spouse and I chose to buy a home in Whale Pass because of the surrounding beauty that this proposed timber sale will destroy. There are other areas on the island to log that do not surround a community.</p>	
Rep. Dan Ortiz	<p>Because of the noticeability of units 1, 2, &amp; 3 in the proposal, it would likely negatively affect the Whale Pass visitor industry; the tourism economy, which is predominant and necessary in Whale Pass, is made up of visitors who are eager to see pristine Alaskan nature. Clearcutting a prominent bay view hillside would certainly be detrimental.</p>	

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<p>Dave Roberts Alaska Fish Tales Lodge</p>	<p>The timber along the roads and view of the forest from the bay is exceptional and I fear that with the logging operation so close to the community we are going to lose that part of the appeal in the area. With the removal of trees near the homes and road area, I fear that it will be very negative for not only our business but all of the businesses and anyone who might have been interested in moving into our community.</p>	
<p>Dawn Waldal- Anderson Mayor Whale Pass Personal letter</p>	<p>The existing economy relies almost entirely on tourism and the outside world to bring money in. We are extremely remote, which is one of our strengths and why people pay so much to experience our small slice of pristine wilderness. It is also one of our greatest challenges as access to resources and other economic opportunities are incredibly limited.</p> <p>If unit 1, 2 &amp; 3 are clear-cut, it will leave a prominent segment of our pristine view-shed looking like a bomb went off. That is not an appealing sight, and does not represent Alaska the way it is promoted to the outside world. The disappointment experienced by visitors when they see the destruction logging causes affects the impression they get of our State and devalues the experience they paid a great deal of money to have. We understand that trees do grow back are not opposed to responsible logging, but old growth is limited, and our economy is fragile. The opportunities available here are most often linked and reliant on tourism and visitors, and our primary selling point is our remote location, the view of our beautiful bay and the experience of pristine wilderness. I would hate to see our potential to</p>	

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	<p>grow be stunted for the next 15 years because a few jobs were provided to loggers and the State could not see the value in preserving a small piece of its natural beauty for longer term economic gain over a few quick bucks.</p>	
<p>Whale Pass Community Comments via City of Whale Pass Mayor</p>	<p>- A portion of the (Units 1,2,3) of the proposed sale is of great concern and will negatively affect the economy, view shed and way of life here in Wale Pass. This sale would devastate the view of towering old growth that blesses our fragile tourism economy. The hillside is a predominate view when visitors come and pay for the Alaska experience of pristine wilderness get away. A clearcut in this location would leave visitors with a less than ideal impression of how the State manages the balance between natural resource development, environmental impact on its people, wildlife an unparallel majestic scenery.</p>	
<p>Point Baker Community Association</p>	<p>and whereas Point Baker Community Association recognizes that conduction this proposed timber sale will be detrimental to the Whale Pass residents' viewshed which is necessary as they seek to diversity their economy and develop new visitor based business.</p>	
<p>James Greeley SR.</p>	<p>Finally, the State is insisting on logging close to residential property and within town limits, ignoring the town's pleas for social justice. The State forester is not concerned with the growing tourism niche and property values. With this plan, the FLUP for Whale Pass doesn't consider visual resources or social and environmental impacts to the City of Whale Pass. The 100' buffer is not really a good</p>	

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	mitigation for the steep slope above block 5.	
SEACC Page 8	<p>There are single properties in Whale Pass that will be heavily impacted by this sale worth more than what the timber sale will net the state of Alaska, not to mention the millions of dollars in annual tourism revenue generated in the area that will dwindle.</p> <p>Omit sale areas on the hillside west of Whale Passage due to aesthetics and scenic value.</p>	