

State of Alaska
Department of Natural Resources
Division of Forestry & Fire Protection
Coastal Region—Southeast Area Office



Forest Land Use Plan
El Capitan Timber Sale
SSE-1380-K
August, 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 & 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 Island
POWIAP	Prince of Wales Island Area Plan
ROW	Right-of-way
SESF	Southeast State Forest
SESFMP	Southeast State Forest Management Plan
USFS	United States Forest Service

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I. Introduction

Project File Number: SSE-1380-K

Division of Forestry & 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 proposed forest operations on approximately 336 acres of land of state lands on Prince of Wales (POW) Island, near El Capitan Passage. 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.

This Draft 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 AS 38.05.945; Best Interest Finding, Timber Sale El Capitan SSE-1380-K (April 3, 2023) available at: <http://notice.alaska.gov/210549> 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 April 3, 2023 Best Interest Finding and are not appealable under this FLUP.

This Draft Forest Land Use Plan is for timber sale(s) for which a Preliminary Best Interest Finding is currently out for review. A final best interest finding must be completed prior to adoptions of a final FLUP pursuant to AS 38.05.035 (e) and AS 38.05.945.

This Forest Land Use Plan is for timber to be harvested that does not require a final finding pursuant to AS 38.05.035 (e) and notification under AS 38.05.945.

A draft of this plan was distributed to the Alaska Department of Fish & Game (ADF&G) and the Department of Environmental Conservation (DEC) for their review and comments relevant to the consistency of this proposed project with the statutes governing forest land use plans (AS 38.05.112) and the requirements of the Alaska Forest Resources & Practices Act (AS 41.17) and its Regulations (11 AAC 95).

This Forest Land Use Plan was made available for public comments; the review period ended on July 17, 2023. After public and agency review of the draft FLUP, the DOF reviewed comments (see Appendix D), made no substantive changes to the operational content and has adopted this FLUP.

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 to the department, may appeal the decision to the DNR Commissioner per AS 44.37.011 and 11 AAC 02.

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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 & Fire Protection Southeast Area Office filed as SSE-1380-K.

A. Legal description

The timber sale area is found within Sections 1, 12, and 13, Township 66 South, Range 78 East, and Sections 6, 7, 8 and 18, Township 66 South, Range 79 East, Copper River Meridian (CRM). The sale area is found within the Petersburg A-4 NW USGS quadrangle. See attached map titled: Appendix A, SSE-1380-K El Capitan Timber Sale Harvest Area Map.

B. Operational Period

Approximately Fall 2023 through end of 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 Land Owners/Jurisdictions

A. State

Activity on ownership:	Access Easement	Harvest	Written Representative Approval
<input checked="" type="checkbox"/> Southeast State Forest	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/> Other state land managed by DNR	<input 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

	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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

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- 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 is primarily composed of commercial forest in the Stratum 2 and 3 types with old growth characteristics. Western hemlock makes up most of the commercial species along with minor components of western red cedar, Sitka spruce and Alaska yellow cedar. The timber identified in this sale is largely on poorly drained organic soils with steeper areas of karst topography and limestone. The larger and better-quality timber is located on the well-drained soils with steeper terrain.

B. Timber Harvest Activities

Timber Harvest Activities are displayed in Table 1.

Table 1. Timber Harvest Activities

Unit ID	Setting	Acres	Topography	Silvicultural Action	Logging Method
1	110	3	Hillside	Clear-cut	High Lead Cable
1	111	2	Hillside	Clear-cut	High Lead Cable
1	SH	57	Irregular	Clear-cut	Shovel log
1	Total	62			
2	Total	14	Irregular	Clear-cut	Shovel log
3	130	11	Hillside	Clear-cut	High Lead Cable
3	SH	49	Irregular	Clear-cut	Shovel log
3	Total	60			
4	140	5	Hillside	Clear-cut	High Lead Cable
4	SH	32	Irregular	Clear-cut	Shovel log
4	Total	37			

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Unit ID	Setting	Acres	Topography	Silvicultural Action	Logging Method
5	Total	39	Irregular	Clear-cut	Shovel
6	170	3	Hillside	Clear-cut	High Lead Cable
6	SH	34	Irregular	Clear-cut	Shovel
6	Total	37			
7	Total	2	Hillside	Clear-cut	High Lead Cable
8	180	6	Hillside	Clear-cut	High Lead Cable
8	181	1	Hillside Pass	Clear-cut	High Lead Cable
8	182	7	Hillside	Clear-cut	High Lead Cable
8	SH	65	Broken	Clear-cut	Shovel
8	Total	79			
9	Total	6	Broken	Clear-cut	Shovel
Total of All Units		336			

C. Site Preparation

- Site preparation will not be necessary. There is sufficient soil disturbance by logging to forego scarification.
- Site preparation will be implemented and described in Table 2:

Table 2. Site Preparation

Unit ID	Acres	Site Preparation Method	Date of Completion

D. Slash Abatement

- Potential for insect infestations caused by slash accumulations exists. Slash abatement for controlling infestations will be implemented as required by 11 AAC 95.370.
- Lop, break and scatter slash; accumulations will be kept to less than 2 feet in height.
- Slash will be disposed of 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 DOF local area office prior to ignition of debris.

E. Soil Stability / Erosion / Mass Wasting

- Maximum percent side slopes are ≤50%
- Maximum percent side slopes are >50%

Percentage of sale area with slopes >50%: 17

Maximum percent slopes: 75

Slope percentages referenced are based on field observations and the use of USFS LiDAR (2018) data and ESRI ArcGIS Pro Slope Analysis toolset.

- There are no indicators of unstable areas.
- Indicators of unstable areas were identified and will be mitigated by actions indicated below.

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 are depicted in the operational map in the Appendices.*

Table 3. 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 riparian area
1	None	Tributary <12%		Yes	Minimize crossings, Site specific approval of crossing locations.
1	None	Tributary >12%		Yes	Minimize crossings, Site specific approval of crossing locations.
1	None	Surface Waters	NA	No	BMPs
2	None	Surface Waters	NA	No	BMPs
3	None	Tributary>12%	105-42-10110	Yes	Split yard, Minimize crossings.
3	None	Surface Waters		No	
4	None	Anadromous	106-30-10800-2050	Yes	Retain timber.
4	None	Non-Cataloged Anadromous	NA	Yes	Retain timber
4	None	Tributary >12%	NA	Yes	Split yard, Minimize crossings.

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Unit	Waterbody Name	AS 41.17.950 Classification	ADF&G AWC #	Required Riparian Protection	Site-specific actions to minimize impacts on riparian area
4	None	Tributary >12%	105-42-10110 Tributary	Yes	Split yard, Minimize crossings.
5	None	Surface Waters	NA	No	BMPs
6	None	Un-Cataloged Anadromous	105-42-10110 Tributary	Yes	Retain timber
6	None	Tributary >12%	Tributary 105-42-10110	Yes	Split yard, Minimize crossings.
8	None	Tributary >12%	105-42-10110 Tributary	Yes	Minimize crossings.
9	None	Tributary >12%	105-42-10110 Tributary	Yes	Maintain bank integrity, Minimize crossings.

BMP = Forest Resources and Practices Regulations Best Management Practices

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

Non-classified surface waters are subject to applicable BMPs in 11 AAC 95.

Notes: Karst features are present on this timber sale I.E.- negative basins, caves, fins, etc. These features vary in sizes and significance. A negative basin is a terrain feature that does not have a readily identifiable surface drainage path to the adjacent terrain. Negative basins may conduct surface flow to subsurface aquifers. Actions around the feature have the potential to affect subsurface conditions and surface water quality elsewhere. Harvest operations shall avoid working directly in negative basins when other options are feasible or when directed by the DOF. Harvest operations shall avoid disturbance of the vegetative mat adjacent to negative basins. Placing slash and debris proximate to negative basin features shall be avoided, minimized and removed upon completion of operations.

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: To the extent that safety permits, Snags and obvious cull trees without Dwarf Mistletoe may at the purchaser’s discretion be left standing at a density of three per acre. The intent is to provide bat roosting and bird habitat. Cull western red and yellow cedar snags are preferred over western hemlock.

H. Cultural and Historical Resource Protection

- This project was reviewed by the State Historic and Preservation Office (SHPO).
- 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. Mitigations actions were addressed in the Best Interest Finding.

Table 4. Other Affected Resources / Areas of Concern

Impacted Resource	Reviewing Agency	Impact/ Mitigation Actions
Scenic	DMLW/ DOF	None
Safety	DOF	Public proximity/see notes

- There are no affected resources or areas of concern other than surface water, fish habitat, and wildlife habitat, which are addressed in this Forest Land Use Plan.

Notes: Warning signs shall be posted where harvest activity such as falling, yarding, or trucking are occurring adjacent to the existing road system.

J. Reforestation

Harvest type as it relates to reforestation requirement:

- Clearcut
- Region I: Partial Harvest leaving more than 50% live basal area (11 AAC 95.375(b)(3))
- Region II or III: Partial Harvest relying on residual trees to result in a stocking level that meets standards of 11 AAC 95.375(b)(4).

Season of harvest:

- Winter harvest only
- Non-winter harvest only
- All-season harvest

Regeneration type:

- Natural regeneration

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

- Coppice

List species: NA

- Artificial regeneration
- Seeding: Species and source of seed (general vicinity location of seed source)

- Planting: Species: _____ Date of proposed planting: _____

Source of seedlings (location of seed source): _____

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). Roads will be built to the DOF Road and Bridge Standards unless otherwise stated. Roads or other means required for the access and removal of this timber from the harvest area(s) or unit(s) are listed in Table 5A and 5B.

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Table 5A. Road Reconstruction and Use

Road ID	Segment	Harvest Unit	Mile **	Road Class	Maximum Grade %*	Constructed By	Maintained By
2000770	As required	6,9	0.08	Secondary	8	Purchaser	Purchaser
2000767	As required	8	0.23	Spur	8	Purchaser	Purchaser

Table 5B. New Road Construction and Use

Road ID	Segment	Harvest Unit	Mile **	Road Class	Maximum Grade %	Constructed By	Maintained By
2000010	10,20,30,40,50,60	3	0.86	Secondary	12	Purchaser	Purchaser
2000011	10	3	0.04	Spur	12	Purchaser	Purchaser
2000015	10	3	0.04	Spur	12	Purchaser	Purchaser
2000016	10	3	0.06	Spur	16	Purchaser	Purchaser
2000020	All	2	0.11	Spur	12	Purchaser	Purchaser
2000060	10,20	1	0.45	Spur	12	Purchaser	Purchaser
2000061	10	1	0.12	Spur	12	Purchaser	Purchaser
2000760	10	8	0.44	Secondary	12	Purchaser	Purchaser
2000760	20,30	8	0.19	Spur	16	Purchaser	Purchaser
2000761	10	8	0.19	Spur	12	Purchaser	Purchaser
2000765	10	8	0.07	Spur	16	Purchaser	Purchaser
2000900	10,20,30,40,50	5,6	1.40	Secondary	12	Purchaser	Purchaser
2000910	10	5	0.17	Spur	16	Purchaser	Purchaser
2700010	10,20	4	0.28	Spur	12	Purchaser	Purchaser
2700012	10	4	0.10	Spur	12	Purchaser	Purchaser

Road Class is as defined in the DOF Road Standards.

*Note: Roads must be less than 20% grade per 8 AAC 61.1060 Additional Logging Standards.

**One-mile equals 5,280 feet.

Notes: “Trucks Entering Highway” shall be posted near the junctions of active forest road systems and the existing USFS road systems when hauling rock or timber.

B. Soil Erosion / Mass Wasting

Maximum percent road side slopes: 45

- Maximum percent side slopes are ≤50%
- Maximum percent side slopes are >50%
 - 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:

Table 6. Road Erosion Control Risk and Mitigation

Road ID	Segment	Point Label	Identified Erosion Risk	Risk Level	Mitigation
All			Surface Fine Migration	Low	FRPA BMPs

General Timber Sale Erosion Control:

- Grass seeding
- Erosion control mats
- Wattle
- Waterbars
- Other: _____
- Not applicable

C. Crossing Structures

Are you removing or replacing drainage structures? YES NO

- No crossing structures are needed within the project area.
- Crossing structures will be placed in access roads as described in the table below:

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

Road ID	Segment	Point Label	Bridge Length (ft.) or Culvert Diameter (in.)	Structure Type	AS 41.17.950 Stream Classification	ADF&G AWC Number	Duration of crossing structure in place
2000010	20	P1031	48”	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000010	20	P1032	18”	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000010	20	P1033	36”	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale

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Road ID	Segment	Point Label	Bridge Length (ft.) or Culvert Diameter (in.)	Structure Type	AS 41.17.950 Stream Classification	ADF&G AWC Number	Duration of crossing structure in place
2000010	20	P1036	24"	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000010	40	P1049	18"	CPP	Tributary to Anadromous > 12 %	N/A	Close of Timber Sale
2000010	50	P1065	24"	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000010	50	P1067	18"	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000010	50	P1069	36"	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2700010	10	P1009	36"	CPP	Tributary to Anadromous < 12%	N/A	Close of Timber Sale
2700010	10	P1010	24"	CPP	Tributary to Anadromous < 12%	N/A	Close of Timber Sale
2700010	20	P1013	24"	CPP	Tributary to Anadromous < 12%	N/A	Close of Timber Sale
2000012	10	P1020	18"	CPP	Tributary to Anadromous < 12%	N/A	Close of Timber Sale
2000012	10	P1021	18"	CPP	Tributary to Anadromous < 12%	N/A	Close of Timber Sale
2000060	10	P704	24"	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000060	20	P712	18"	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000060	20	P714	18"	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000060	20	P717	18"	CPP	Surface Water	N/A	Close of Timber Sale
2000760	20	P135	18"	CPP	Surface Water	N/A	Close of Timber Sale
2000761	10	P147	18"	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000900	10	P166	24"	CPP	Surface Water	N/A	Close of Timber Sale
2000900	10	P169	24"	CPP	Surface Water	N/A	Close of Timber Sale

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Road ID	Segment	Point Label	Bridge Length (ft.) or Culvert Diameter (in.)	Structure Type	AS 41.17.950 Stream Classification	ADF&G AWC Number	Duration of crossing structure in place
2000900	10	P179	18"	CPP	Surface Water	N/A	Close of Timber Sale
2000900	20	P188	18"	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000900	20	P189	20'	LC	Non-Cataloged Anadromous	N/A	Close of Timber Sale
2000900	30	P194	18"	CPP	Tributary to Anadromous > 12%	N/A	Close of Timber Sale
2000900	40	P210	36"	CPP	Surface Water	N/A	Close of Timber Sale
2000900	40	P212	36"	CPP	Surface Water	N/A	Close of Timber Sale
2000900	40	P213	18"	CPP	Surface Water	N/A	Close of Timber Sale
2000900	40	P214	18"	CPP	Surface Water	N/A	Close of Timber Sale
2000900	40	P217	24"	CPP	Surface Water	N/A	Close of Timber Sale
2000900	50	P219	18"	CPP	Surface Water	N/A	Close of Timber Sale
2000900	50	P223	24"	CPP	Surface Water	N/A	Close of Timber Sale

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	Estimated Closure Date	Projected Road Use after Timber Harvest
2000770		6,9	Remove culvert	End of Sale	Federal access

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Road ID	Segment	Unit	Closure Type	Estimated Closure Date	Projected Road Use after Timber Harvest
2000767	East side	8	FRPA Closure	End of Sale	None
2000010	10,20,	3	FRPA Inactive	3 years after sale end	Silviculture, Firewood
2000010	30,40,50,60	3	FRPA Closure	End of Sale	Silviculture
2000011	10	3	FRPA Closure	End of Sale	Silviculture
2000015	10	3	FRPA Closure	End of Sale	Silviculture
2000016	10	3	FRPA Closure	End of Sale	Silviculture
2000020	All	2	FRPA Closure	End of Sale	Silviculture
2000060	10,20	1	FRPA Closure	3 years after sale end	Silviculture, Firewood
2000061	10	1	FRPA Closure	End of Sale	Silviculture
2000760	10	8	FRPA Closure	3 years after sale end	Silviculture, Firewood
2000760	20,30	8	FRPA Closure	End of Sale	Silviculture
2000761	10	8	FRPA Closure	3 years after sale end	Silviculture, Firewood
2000765	10	8	FRPA Closure	End of Sale	Silviculture
2000900	10,20,30,	5,6	FRPA Closure	3 years after sale end	Silviculture, Firewood
2000900	40,50	5	FRPA Closure	End of Sale	Silviculture
2000910	10	5	FRPA Closure	End of Sale	Silviculture
2700010	10,20	4	FRPA Closure	3 years after sale end	Silviculture, Firewood

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Road ID	Segment	Unit	Closure Type	Estimated Closure Date	Projected Road Use after Timber Harvest
2700012	10	4	FRPA Closure	End of Sale	Silviculture

Purchaser shall leave all roads not closed in FRPA Inactive Road Condition per 11 AAC95.315(c).
 Closed Roads will meet FRPA Closure requirements of 11 AAC65.320.

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.
- 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.

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
Safety	DOF	Traffic/ Warning signage

V. Approvals:

This 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.



8/16/2023

Commissioner

Date

VI. Reconsideration

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

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

If no reconsideration is filed by that date, this decision goes into effect as a final order and decision on **September 18, 2023**.

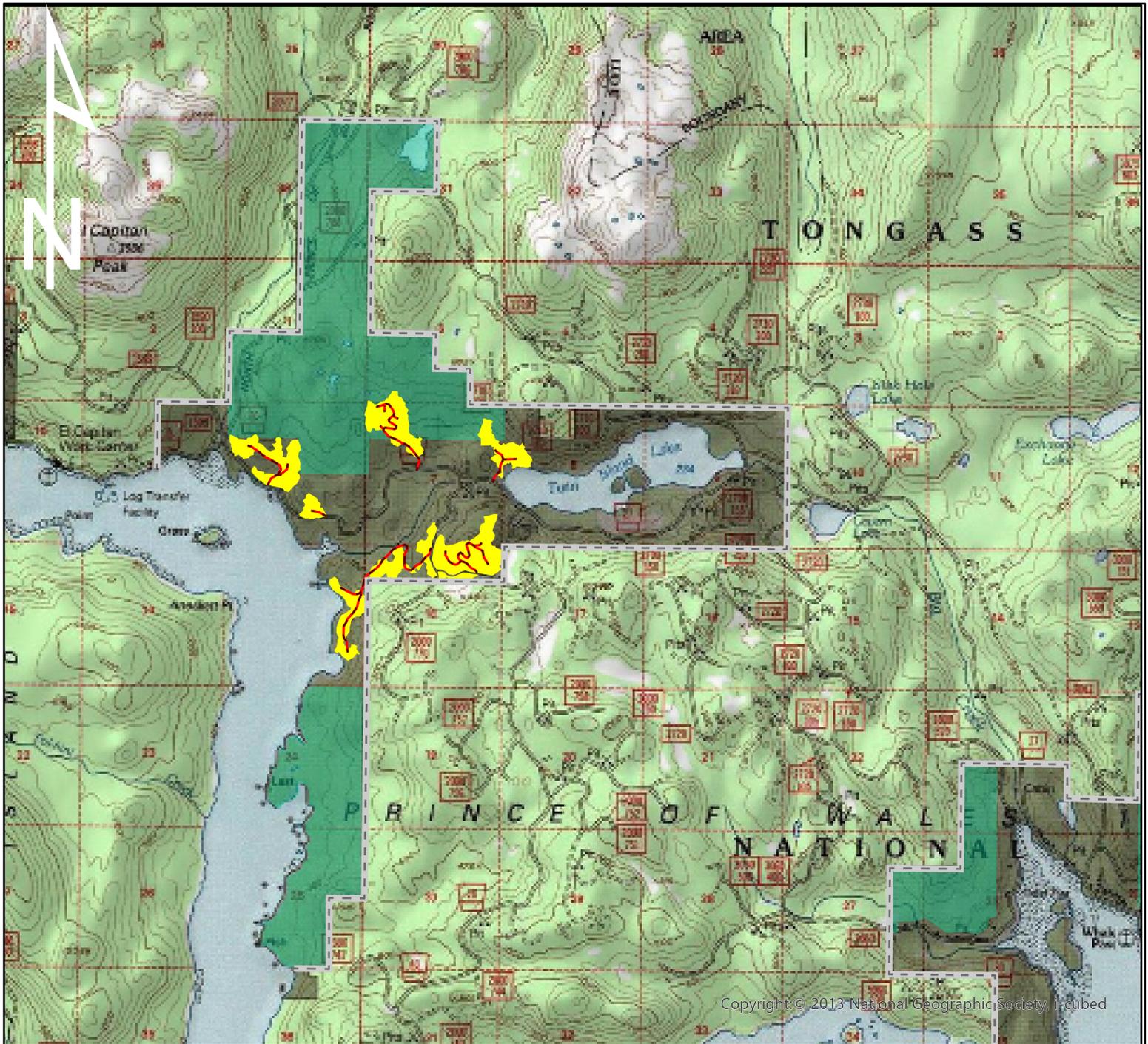
A copy of 11 AAC 02 is enclosed and is also available on the department's website at <https://dnr.alaska.gov/mlw/pdf/DNR-11-AAC-02.pdf>.

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

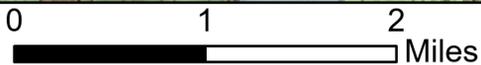
Appendix A: Timber Sale Maps

Appendix A1 Vicinity Maps (1 page)

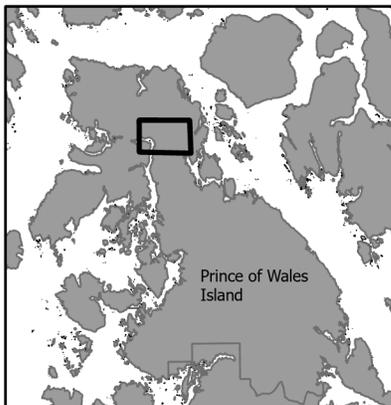
Appendix A2 Unit Maps (7 pages)



Copyright © 2013 National Geographic Society, I-Cubed



Area Map 1 in = 1 Mile



Vicinity Map 1 in = 32 miles

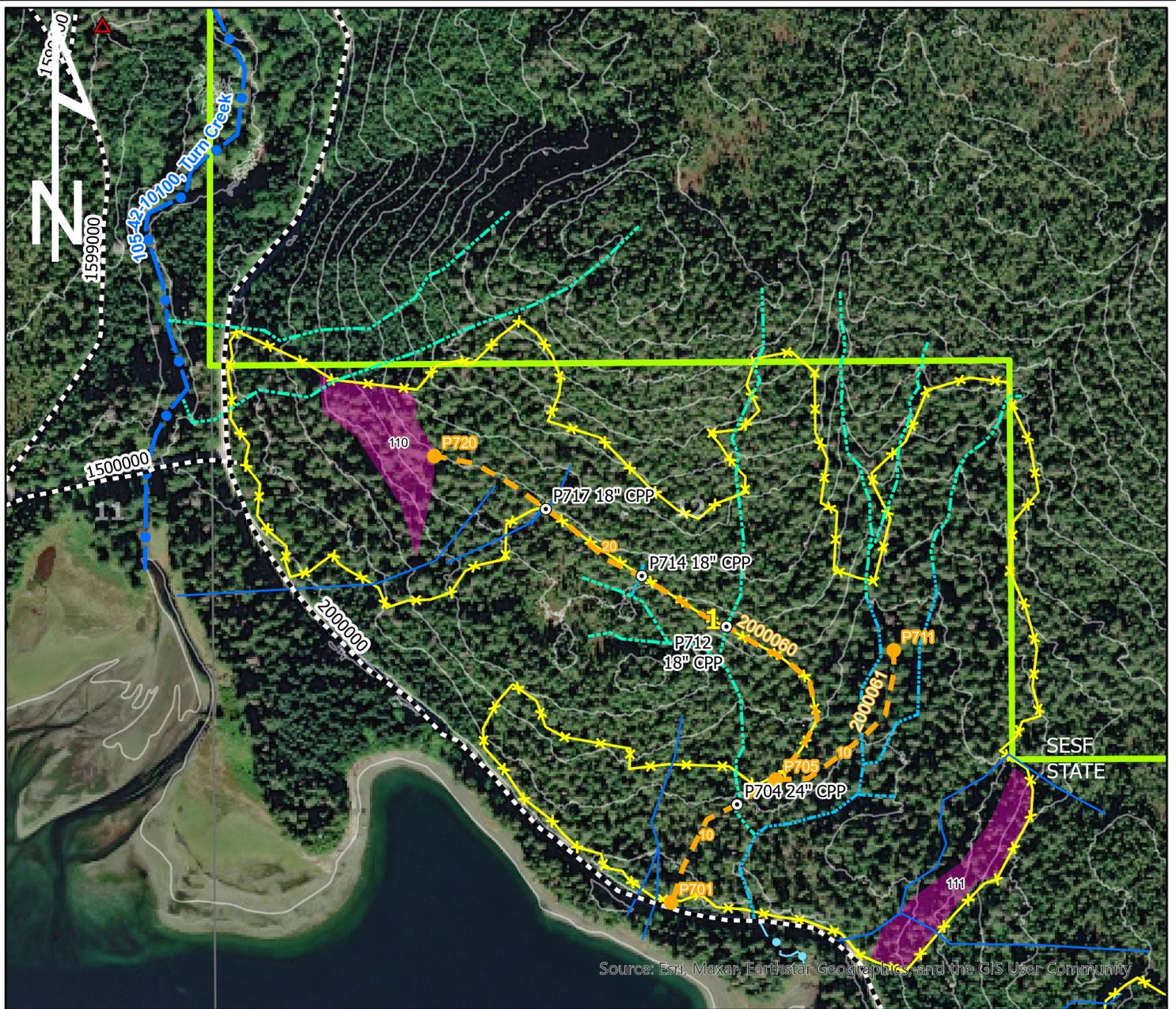
LEGEND

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

**APPENDIX A1
SSE-1379-K
EI CAPITAN TIMBER SALE
AREA MAP**

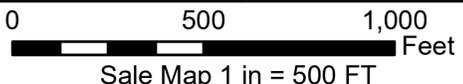


TC 01/31/2023

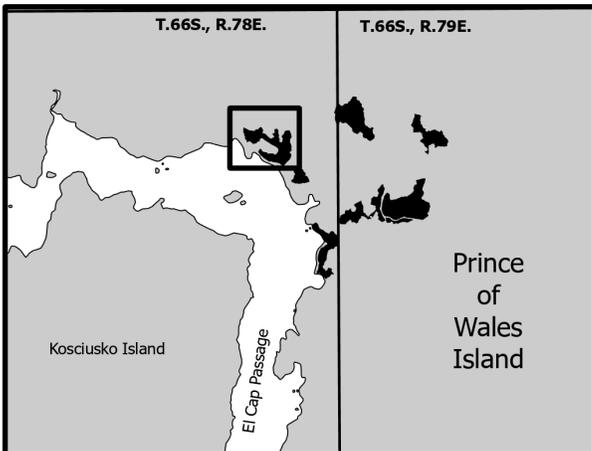


Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

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Source: USFS LiDAR 2018

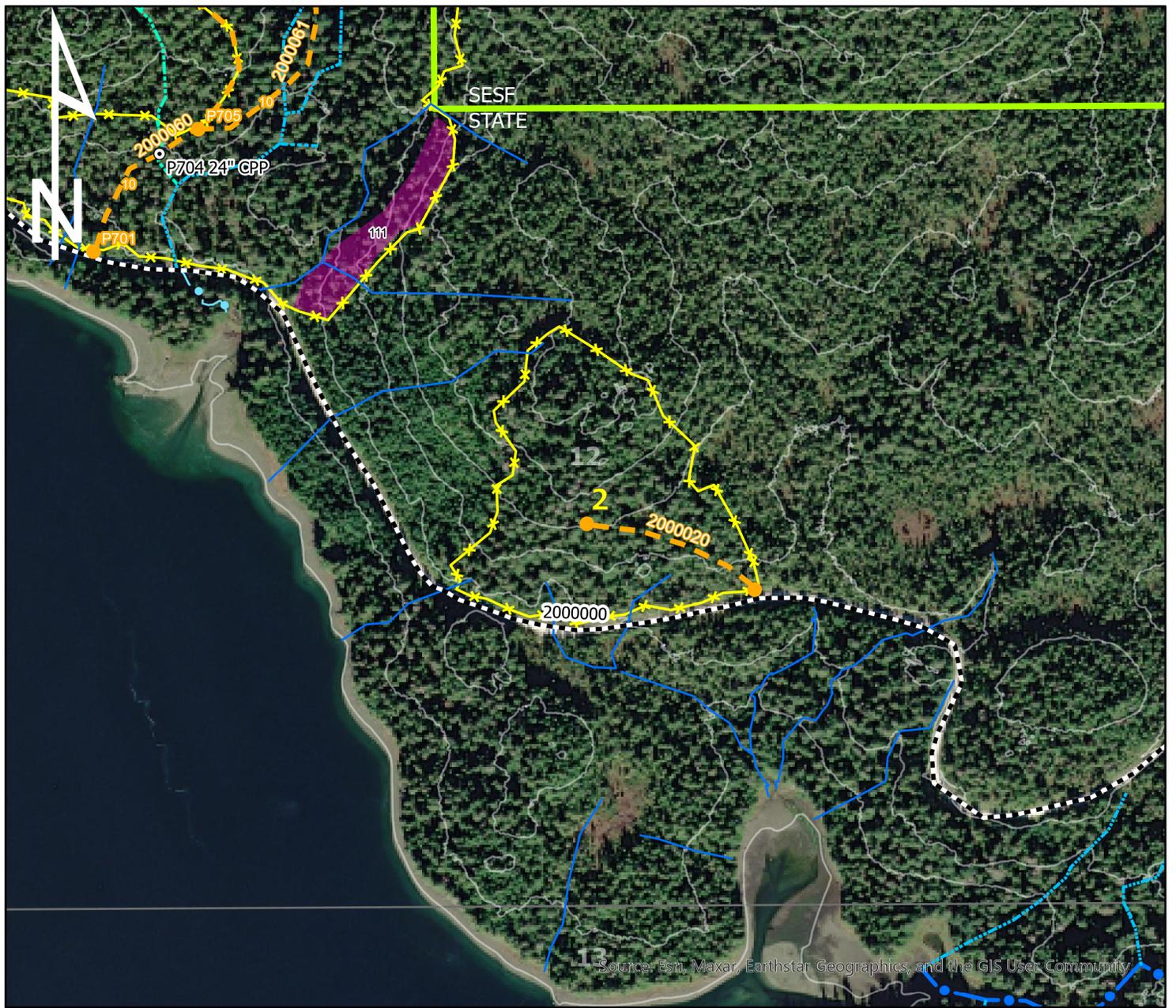


Legend	
	Proposed Harvest Unit
	Proposed Cable Setting
	Southeast State Forest (SESF)
	Proposed Drainage Structure
	Cave
	Proposed Road
	Existing Road
	Reconstruction
	Closed Road
	Property Line
	Cataloged Anadromous
	Non-Cataloged Anadromous
	Tributary to Anadromous <12%
	Tributary to Anadromous >12%
	General Water Quality



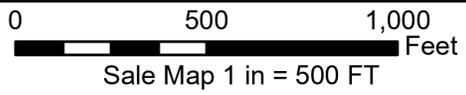
APPENDIX A2
SSE-1380-K
EL CAPITAN TIMBER SALE
PAGE 1 OF 7
UNIT 1



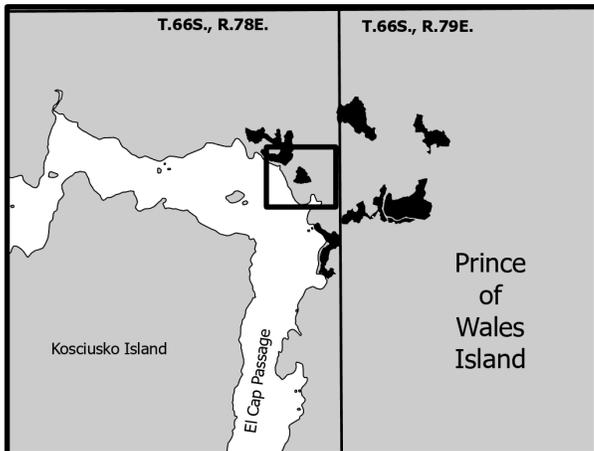


Source: Fsn, Maxar, Earthstar Geographics, and the GIS User Community

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Source: USFS LiDAR 2018

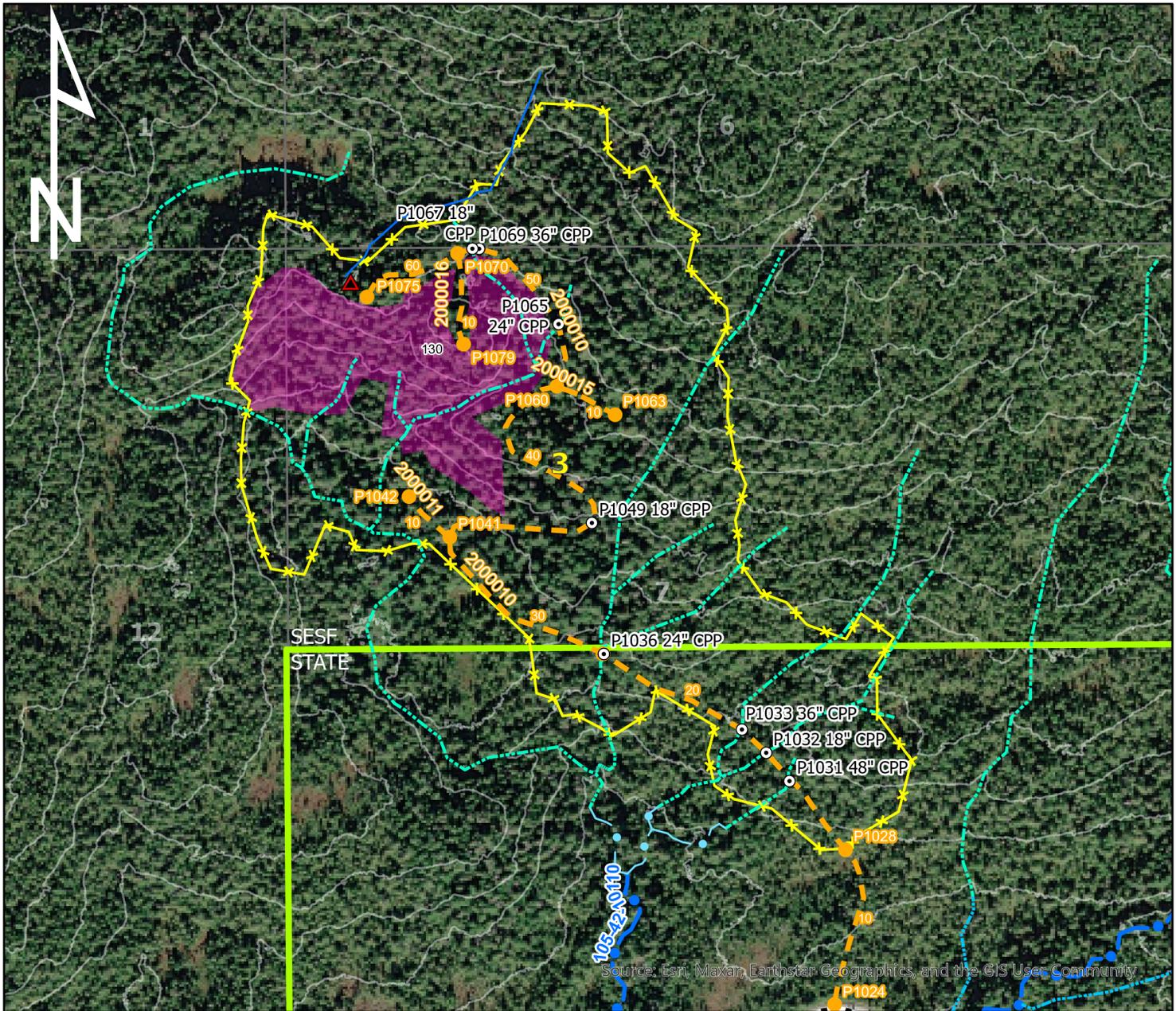


Legend	
	Proposed Harvest Unit
	Proposed Cable Setting
	Southeast State Forest (SESF)
	Proposed Drainage Structure
	Cave
	Proposed Road
	Existing Road
	Reconstruction
	Closed Road
	Property Line
	Cataloged Anadromous
	Non-Cataloged Anadromous
	Tributary to Anadromous <12%
	Tributary to Anadromous >12%
	General Water Quality

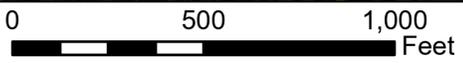


APPENDIX A2
SSE-1380-K
EL CAPITAN TIMBER SALE
PAGE 2 OF 7
UNIT 2



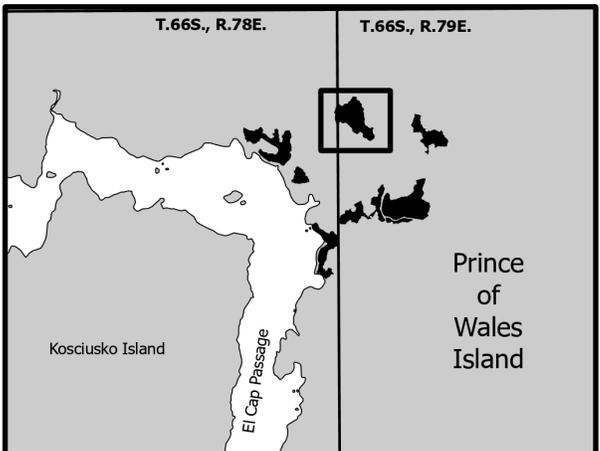


Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Sale Map 1 in = 500 FT

Contour Interval=40 FT
Source: USFS LiDAR 2018

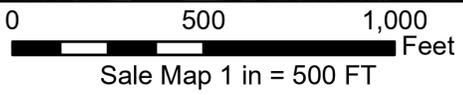
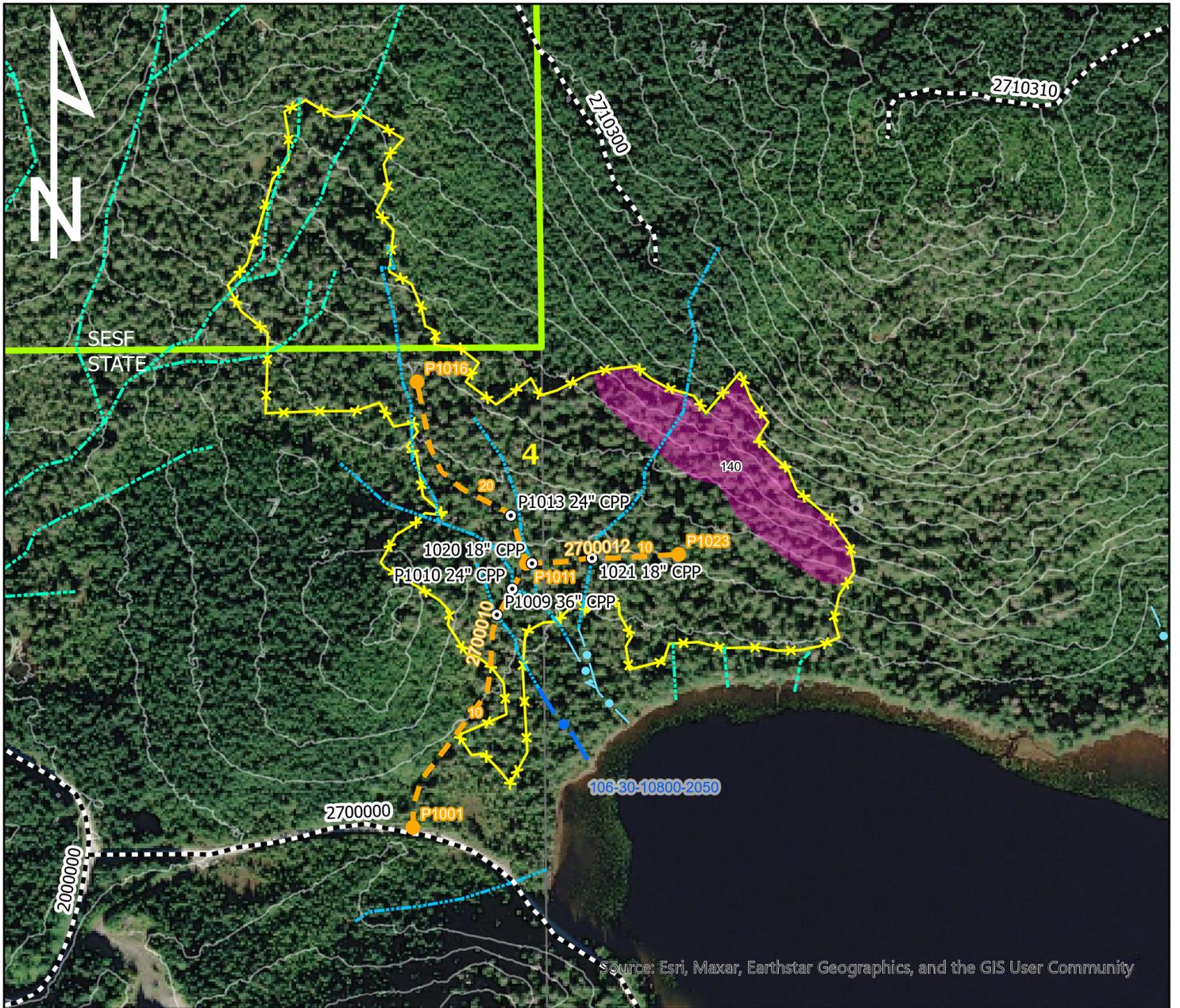


Vicinity Map 1 in = 2 miles

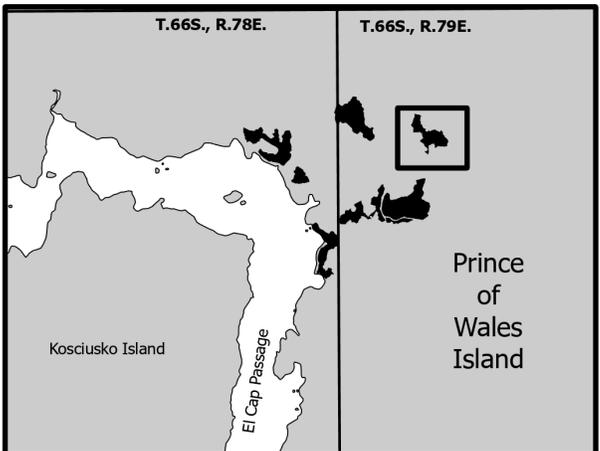
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	Proposed Cable Setting
	Southeast State Forest (SESF)
	Proposed Drainage Structure
	Cave
	Proposed Road
	Existing Road
	Reconstruction
	Closed Road
	Property Line
	Cataloged Anadromous
	Non-Cataloged Anadromous
	Tributary to Anadromous <12%
	Tributary to Anadromous >12%
	General Water Quality

APPENDIX A2
SSE-1380-K
EL CAPITAN TIMBER SALE
PAGE 3 OF 7
UNIT 3





Contour Interval=40 FT
Source: USFS LiDAR 2018

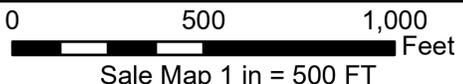


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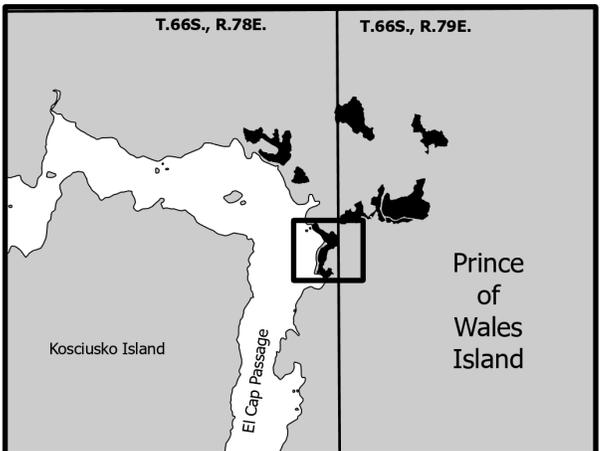
Legend	
	Proposed Harvest Unit
	Proposed Cable Setting
	Southeast State Forest (SESF)
	Proposed Drainage Structure
	Cave
	Proposed Road
	Existing Road
	Reconstruction
	Closed Road
	Property Line
	Cataloged Anadromous
	Non-Cataloged Anadromous
	Tributary to Anadromous <12%
	Tributary to Anadromous >12%
	General Water Quality

APPENDIX A2
SSE-1380-K
EL CAPITAN TIMBER SALE
PAGE 4 OF 7
UNIT 4





Contour Interval=40 FT
Source: USFS LiDAR 2018

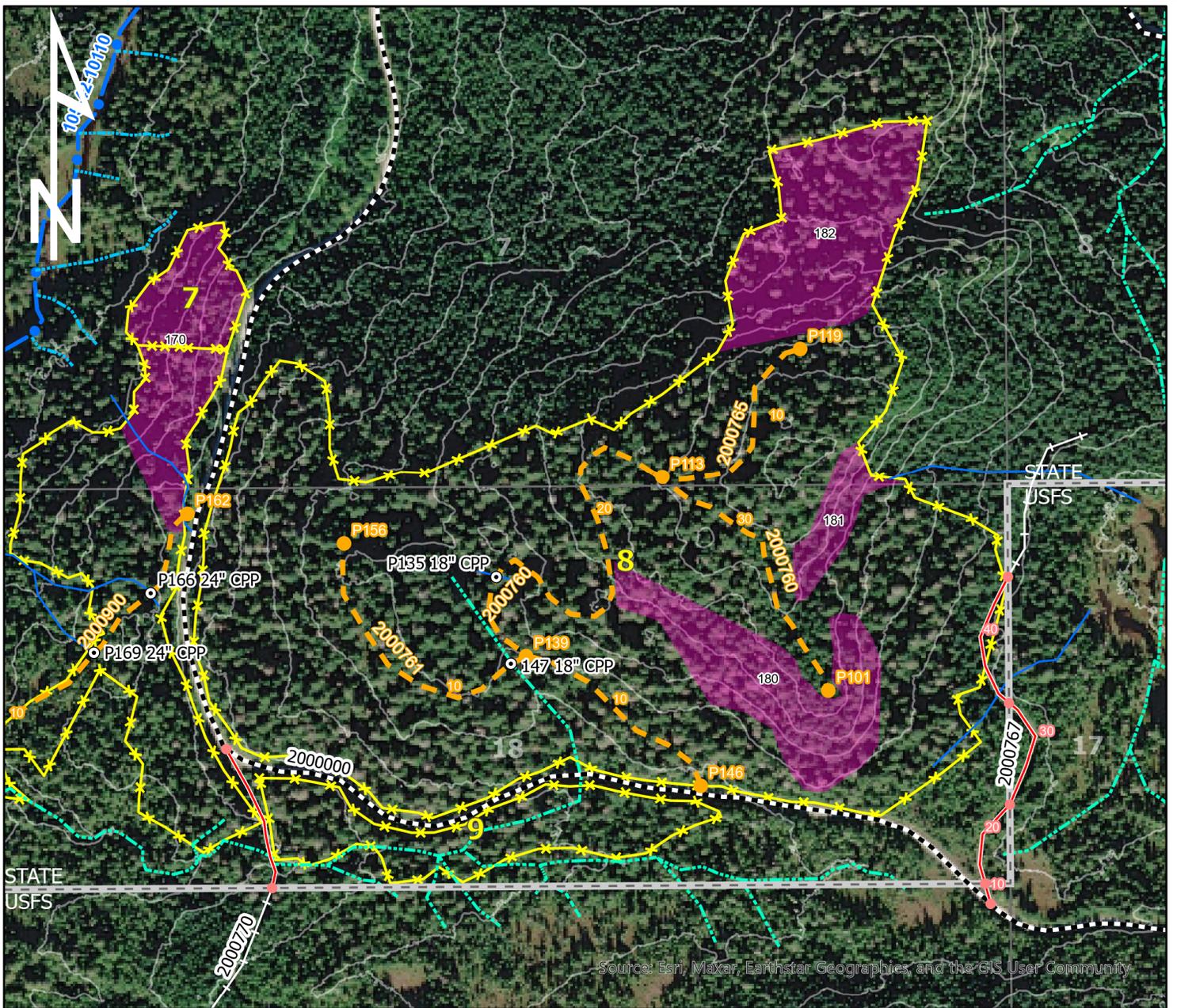


Vicinity Map 1 in = 2 miles

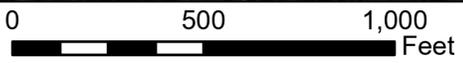
Legend	
	Proposed Harvest Unit
	Proposed Cable Setting
	Southeast State Forest (SESF)
	Proposed Drainage Structure
	Cave
	Proposed Road
	Existing Road
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	Tributary to Anadromous >12%
	General Water Quality

APPENDIX A2
SSE-1380-K
EL CAPITAN TIMBER SALE
PAGE 5 OF 7
UNIT 5



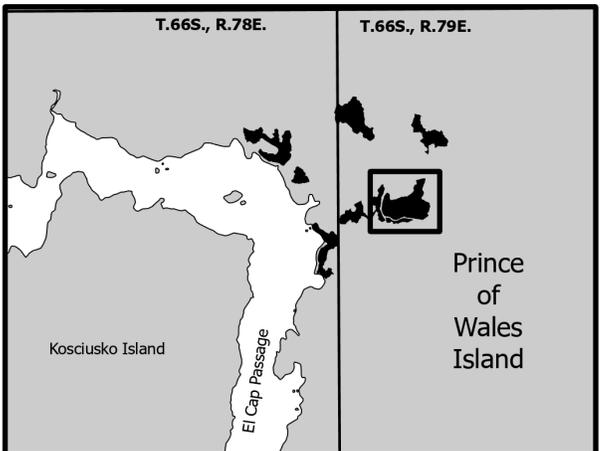


Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Sale Map 1 in = 500 FT

Contour Interval=40 FT
Source: USFS LiDAR 2018



Vicinity Map

1 in = 2 miles

Legend

- Proposed Harvest Unit
- Proposed Cable Setting
- Southeast State Forest (SESF)
- Proposed Drainage Structure
- Cave
- Proposed Road
- Existing Road
- Reconstruction
- Closed Road
- Property Line
- Cataloged Anadromous
- Non-Cataloged Anadromous
- Tributary to Anadromous <12%
- Tributary to Anadromous >12%
- General Water Quality

APPENDIX A2
SSE-1380-K
EL CAPITAN TIMBER SALE
PAGE 7 OF 7
UNITS 8,9



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

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.

Forest Land Use Plan for El Capitan Timber Sale SSE-1380-K

Appendix D: DRAFT FLUP Public Comment

Appendix D

**SSE-1380-K, El Captain Timber Sale
Comments & Responses**

Department of Natural Resources, Division of Forestry and Fire Protection
July 2023

The following people commented on the Proposed El Capitan Timber Sale SSE-1380-K during or proximate to the comment period that ended on July 17, 2023.

Katie Rooks/ Maranda Hamme Southeast Alaska Conservation Council (SEACC)

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

Commenter	Comment	Response
	General Timber Sale Comment	
<p>Rooks/ Hamme SEACC</p>	<p>This timber sale is unlawful because it uses public lands outside the Southeast State Forest for purposes contrary to the area’s management plan:</p> <p>The primary problem with the draft FLUP is that it plans clearcut old-growth logging on 264 (of the total of 340) acres which are outside the Southeast State Forest (SESF) and identified and managed through the 1998 Prince of Wales Island Area Plan (POWIAP) for recreation and subsistence uses, not for timber harvest.</p> <p>The clear management intent is that lands within this management unit which are designated as other than General Use or Settlement and/or less than 400 feet from tidelands should not be logged.</p> <p>This timber sale was not designed, as the draft FLUP claims, “to be consistent with the management intent of the following documents: POWIAP [emph.added], Southeast State Forest Management Plan, and Alaska Forest Resources and Practices Act (FRPA).” It directly countermands the management intent of the POWIAP, in particular. Additionally, the draft FLUP includes no mitigations to the harvest plan based on aesthetic factors identified as important to preserve in the management plan. It is therefore not permissible for this timber sale to proceed as designed in this draft FLUP.</p>	<p>Please see the Best Interest Finding. Comment noted, no change made.</p>
	Wildlife Comment	
<p>Rooks/ Hamme</p>	<p>Deer habitat in the area has not been physically evaluated by ADF&G wildlife biologists for this project, and</p>	<p>Please see the Best Interest Finding. Comment noted, no change made.</p>

Commenter	Comment	Response
SEACC	therefore, sound science has not been used to develop this FLUP:	
Rooks/ Hamme SEACC	<p>Wolf and bear dens may have been identified and marked on maps or aerial photos by ADF&G some time prior, but it is clear that no recent field surveys by ADF&G wildlife staff were used to actually determine whether or not dens existed at the time of El Capitan timber sale layout.</p> <p>There is no information provided about how ADF&G determined there were no “known” wolf or bear dens in the area. What sources of data did it use, and how old were those data sources? These shortcuts and omissions, not to mention the complete lack of on-site field work, dilute and corrupt the process of planning sustainable timber sales and are, at the least, unethical.</p>	Please see the Best Interest Finding. Comment noted, no change made.
Rooks/ Hamme SEACC	Subsistence use and the importance of the proposed sale area for subsistence users has also not been accurately characterized or studied prior to developing this FLUP, contrary to area management plans and the Alaska Constitution.	Please see the Best Interest Finding. Comment noted, no change made.

Note: ADF&G Division of Wildlife August 3, 2023 Memo is attached to this appendix to aid the reader in understanding ADF&G and DNR statements.

Division of Wildlife Conservation
Ryan Scott, Acting Director

Region I, Ketchikan Area Office
2030 Sea Level Dr. Suite 205
Ketchikan, AK 99901



Alaska Department of Fish and Game
Doug Vincent-Lang, Commissioner

PO Box 115526
Juneau, AK 99811-5526
www.adfg.alaska.gov

8/3/2023

To:
Mark Minnillo
Habitat Biologist
Habitat Section
Craig, AK

From:
Tessa Hasbrouck
Assistant Area Biologist
Ketchikan, AK

The Division of Wildlife Conservation (DWC), Alaska Department of Fish and Game (ADF&G), provided comments pertaining to wildlife habitat on the State of Alaska El Capitan Timber Sale PBIF on July 29, 2022 to Area Forester Greg Staunton. ADF&G submitted comments on the public's comments on the State of Alaska El Capitan Timber Sale PBIF on February 24, 2023 to Greg Staunton. The following comments are in response to Southeast Alaska Conservation Council's (SEACC) wildlife-related comments on the State of Alaska El Capitan Timber Sale FLUP. SEACC's comments were submitted to the Division of Forestry and Fire Protection (DOF), Alaska Department of Natural Resources (ADNR) on July 17, 2023, and DWC was asked to provide comments on SEACC's letter on August 2, 2023.

SEACC Comment: "Deer habitat in the area has not been physically evaluated by ADF&G wildlife biologists for this project, and therefore, sound science has not been used to develop this FLUP."

DWC Response: On July 28, 2022, Alaska Department of Fish and Game (ADF&G), Division of Wildlife Conservation (DWC), submitted a memo including comments evaluating wildlife habitat on the State of Alaska El Capitan Timber Sale PBIF. These comments include the following information:

"ADF&G DWC staff used data from 62 GPS-collared deer as input to a habitat selection analysis to determine important deer habitat on Prince of Wales (POW), specifically in the area of this timber sale. We built models using an 'all-subsets' process that constructed many candidate models using LiDAR, terrain, and timber harvest covariates and chose the top model via cross-validation performance. Important seasonal deer habitat was defined as the 20% of the landscape containing the highest habitat selection scores (Fig. 1).

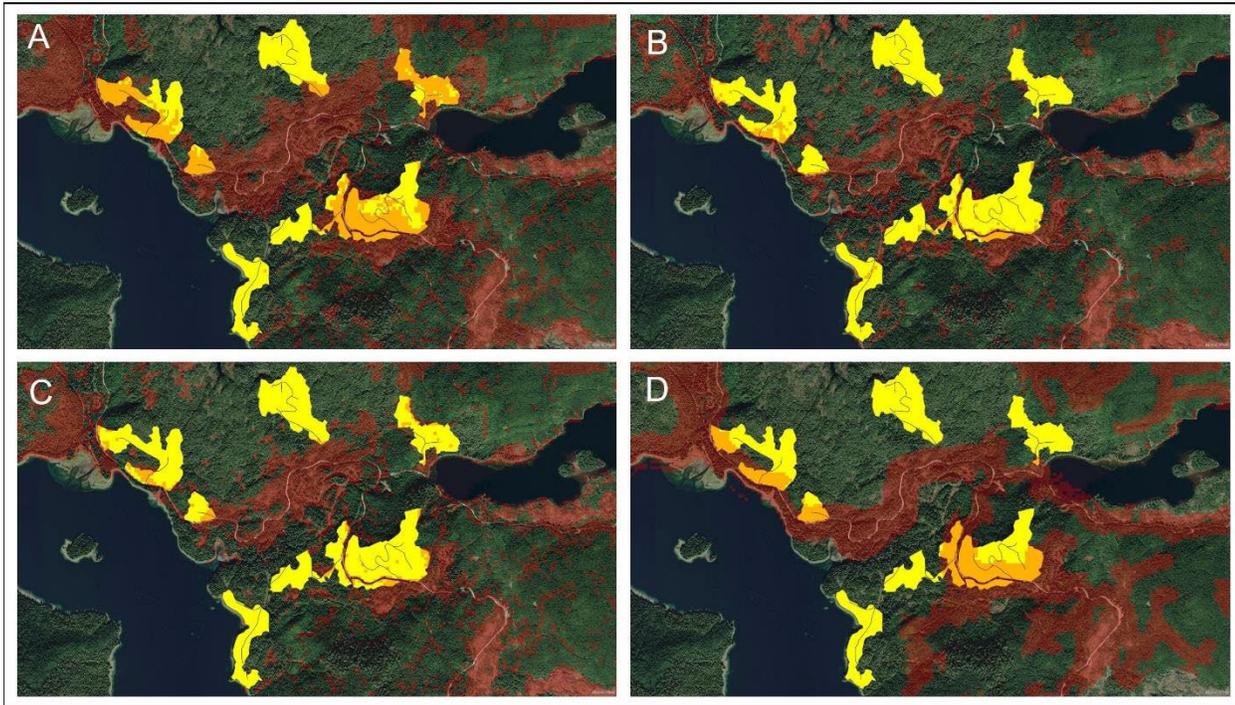


Figure 1. Seasonal important deer habitat (top 20% quantile; denoted in red) in and near the proposed El Capitan timber units (denoted in yellow) based on the research of Division of Wildlife Conservation (ADF&G DWC) staff (Gregovich et al., unpublished). Analyses were conducted for the following seasons: A) late winter, B) early summer, C) late summer, and D) fall.

This analysis indicated some of the proposed timber sale units have important deer habitat, especially during the fall and winter. Clear-cutting timber in Units 3 and 5 would have a minimal impact on important deer habitat. Clear-cutting Units 1, 6, 7, and 8 would remove important fall and winter deer habitat within a portion of the units. Clear-cutting Units 2 and 4 would remove important fall and winter habitat throughout the entire unit.

Although there is important deer habitat in this proposed timber sale, the impact on the overall deer population in Game Management Unit 2 is likely to be minimal. However, due to the logging legacy in the area around this timber sale, deer numbers may be impacted locally with this additional loss of winter 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 clear-cut between 1957-1996 and may currently be in stem exclusion. This timber sale will remove important winter deer habitat, but important winter deer habitat will remain in between these timber sale units. Due to the remaining important habitat in between the timber sale units, DWC does not have major concerns for impacts on deer populations or the predator populations that rely on deer.”

SEACC indicated that this memo was redacted, and therefore they were unable to read these comments and evaluate ADF&G’s deer habitat assessment. Deer habitat was evaluated with the use of resource selection function data from previously collared deer. Information included in the memo demonstrates ADF&G’s evaluation of deer habitat in the proposed sale areas. In summary, deer habitat quality will be reduced in the local area, but the proposed sales will not significantly reduce the Game Management Unit 2 deer population. The number of deer hunters that use the WAA 1527

area (Fig. 2) is relatively low compared to other Wildlife Analysis Areas (WAA). The average number of hunters hunting in WAA 1527 annually is 19 compared to more heavily used WAA's near Klawock and Craig which average 200 hunters annually.

SEACC Comment: "No wildlife habitat staff actually conducted field surveys to determine if there were current wolf and bear dens in the area."

DWC Response: DWC manages a wolf and bear den database of known den locations. This database includes historic and active den sites. The majority of known den sites were discovered during radio-collaring projects in previous years. Radio-collaring projects are among the most efficient methods for locating den sites, and there are no current collaring efforts being conducted by ADF&G in Game Management Unit 2. DWC staff referenced the den site database and noted there were no known wolf or black bear dens within or in close proximity to the proposed timber sale units.

SEACC Comment: "Subsistence use and the importance of the proposed sale area for subsistence users has also not been accurately characterized or studied prior to developing this FLUP, contrary to area management plans and the Alaska Constitution."

DWC Response: On February 24, 2023, DWC submitted a memo including information pertaining to the public's comments on deer hunting within the State of Alaska El Capitan Timber Sale PBIF. These comments included the following information:

"Deer harvest and trapping occur within this area. Hunters are required to report the location of their deer harvest to DWC. DWC can share deer harvest information at the Wildlife Analysis Area (WAA) level. These timber sale units are in 2 WAAs (Fig. 2), WAA 1527 (179 km²) and WAA 1530 (257 km²). A relatively low proportion of the unit wide deer harvest occurs within these two WAAs (Table 1). During regulatory years 2012-2021, on average 19 hunters annually harvested 17 deer in WAA 1527 and 125 hunters annually harvested 143 deer in WAA 1530. On average, 160 hunters annually harvest deer within these two WAAs. Although trappers report location of furbearer harvest, this data is not coded to specific WAAs. Clearcut logging these units may have a short-term (5-7 years) positive impact on the hunters and trappers who use the immediate area but will likely cause a long-term decline in hunting opportunity in this location."

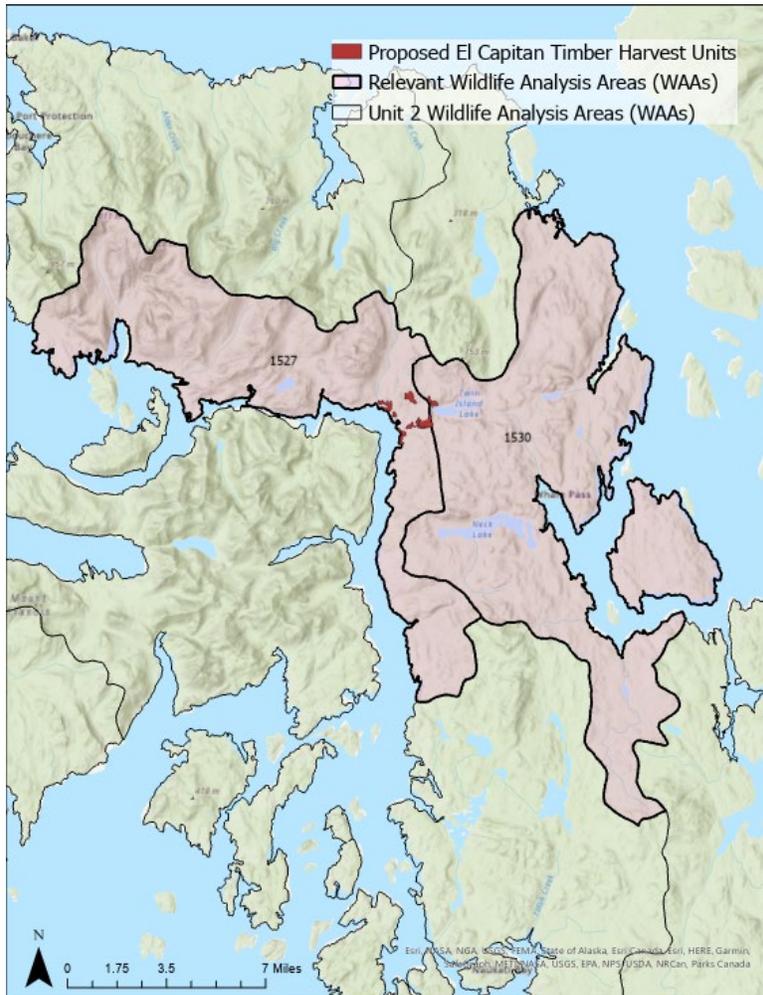


Fig 2. El Capitan proposed timber sale and relevant Wildlife Analysis Areas (WAAs), Unit 2, Southeast Alaska.

Table 1. Total number of hunters who attempted to harvest deer and the total number of deer harvested in Wildlife Analysis Areas (WAA) 1527 and 1530 compared to the total Unit 2 Deer Harvest during regulatory years 2012-2021, Southeast Alaska.

Regulatory year	WAA 1527		WAA 1530		Unit 2 Total	
	Number Hunters	Total Deer Harvested	Number Hunters	Total Deer Harvested	Number Hunters	Total Deer Harvested
2012	18	20	78	96	3189	3648
2013	14	6	77	127	3120	3561
2014	10	3	140	218	3511	3902
2015	20	23	158	194	3620	4235
2016	15	17	180	235	3514	3537
2017	22	18	145	146	2872	2413
2018	20	20	98	93	2440	2091
2019	33	20	116	106	2224	1959
2020	18	18	128	106	2202	1846
2021	25	28	131	113	2129	1824
Average	19	17	125	143	2882	2901

In summary, ADF&G, DWC provided comments on the El Capitan Timber sale at the request of the Area Forester on two separate occasions. Comments covered deer habitat, wolf and black bear den site presence, and hunter use of the area proposed for cutting. It was determined that the proposed cuts would have an impact on availability of winter deer habitat, but that the impact would not cause a decline in the GMU 2 population. There were no known wolf or black bear dens in the area, and hunter use of the larger WAA areas were relatively low. DWC suggests sharing the comments submitted to DOF with the public so they can read ADF&G's analysis of the proposed El Capitan Timber sale units.