Southern Southeast FYSTS 2026-2030
Comments

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

The following comments were received during the public comment period on the SSE FYSTS 2026-2030.

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Commenter	Comment	Adoption Action
	SITE SPECIFIC	
	Gravina Island Area	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	Canopy loss on Gravina Island. The north side of the island, an area of approximately 9 kha, has experienced 549 ha of tree cover loss; about a 7.6% deforestation rate since 2000. No further logging should occur on Gravina Island. Gravina Island has experienced significant deforestation, and the proposed sales would expand the contiguous area of already degraded forest landscapes. GlobalForestWatch data indicates notable canopy loss in 2007 (138 hectares), 2022 (241 hectares), and 2023 (115 hectares), underscoring ongoing fragmentation. The proposed sale is further complicated by substantial infrastructure requirements, including constructing a new access spur, a bridge crossing the East Fork of Bostwick Creek, and deferred maintenance on secondary roads. These challenges align with the broader economic analysis presented earlier in this document and supported by studies from Taxpayers for Common Sense, which identify road construction and other infrastructure costs as primary factors contributing to the consistent financial losses in timber operations. Notably, portions of this sale area were previously under contract in 2007 but remain unharvested. The State's own review suggests that helicopter extraction is the most viable option for this terrain, yet no operators currently offer such services. Given these logistical challenges, the significant costs associated with infrastructure development, and the compounded ecological harm to an already vulnerable habitat, this sale is neither economically nor environmentally justifiable. Moreover, historically Gravina has been a prime destination for Ketchikan-area deer hunters, because it is quickly and easily accessible from Ketchikan. Further clearcutting will inevitably reduce the opportunity for hunting success as logged areas regenerate into thickets and then into stem-exclusion areas, essentially eliminating deer habitat for decades. As noted above, in order for the Ketchikan-area public to meaningfully evaluate the desirability of either of the proposed Gravina sales, DOF should indicate the potential buyer(s) of the sale and the expected fate of the logs – whether milled locally, rafted to a Prince of Wales destination, or merely exported in the round. Before deciding whether to proceed with or abandon the proposed Vallenar and Bostwick sales, the DOF should hold one or more public meetings in Ketchikan and consult with and seek input from organizations and individuals in the Alaska Native community, some of whom have explicitly opposed logging on Gravina Island in the past, to protect cultural traditions and uses. The DOF should expand its deadline for comments so as to include that public participation in the basic decision whether to proceed further with the sales.	

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Mark Minnillo, ADFG (Alaska Department of Fish and Game)	Bostwick and Vallenar Point This area includes a portion previously offered as Bostwick #1 Timber Sale which was not completed under a prior timber sale contract in 2007. Access to this area will require the crossing of Bostwick Creek, anadromous stream 101-27-10360. Fish passage and a fish habitat permit will be required for this crossing. There are no other know fish-bearing water bodies located in this harvest area.	
	North Thorne Bay Area	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	The 9 kha area surrounding the proposed sales in North Thorne Bay has experienced an extreme 22% decrease in tree cover since 2000. Notably in 2004, an 878 ha area of canopy loss was recorded. The proposed sales will require at least an identified 1.54 miles of road construction, with Stairwell sale road construction still yet to be determined. Harvest includes "isolated patches of timber remaining following previous harvest entries… requiring the construction of new access spurs". Which would suggest the logging of the final habitat within a whole area. Along with the incredibly high rate of deforestation in the surrounding area, the remaining sale areas now push further into higher slope gradient terrain. Not only does this present a logistical issue in consideration of harvest, but the collective effect of soil disturbance means this area would be particularly put at higher risk of landslides.	
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	A significant portion of the proposed timber harvest area in C071S084E Section 28, 29, 33, and 32, and C072S084E Section 3, 4, and 10 is involved in a land sales project. ADL 108352 and ADL 108911.	No active land sales per Timothy Shilling, DMLW Competitive Land Sales Manager
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	Backside Sales Backside #1. Habitat has no specific comments to offer for this sale. Backside #2. Road construction associated with this sale will require crossing the upper, uncatalogued portion of stream 102-70-10740. Resident fish passage and a fish habitat permit will be required at this crossing location. Overlook Sale Harvest would facilitate initial access for later subdivision actions by the State. Habitat has no specific comments to offer for this sale. Stairway Sales Although listed under "North Thorne Bay" these sales are located south of Thorne Bay. Habitat has no specific comments to offer for this sale	

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	Patterson River Area	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	The DOF should not disturb this valuable site. As of 2010, 95% of the land cover in the Patterson River area near Thomas Bay consisted of tree cover with canopy densities exceeding 75%. According to data from GlobalForestWatch, no forest canopy loss has been detected in the proposed Patterson River sale area since satellite tracking began in 2001. The area features a lowland coastal mixed old-growth aged stand, characterized by significant ecological value, including carbon storage, biodiversity support, and habitat resilience. Logging in this area would disrupt a uniquely valuable habitat and hasten its deforestation. If any logging were to occur, it should only be by helicopter and utilize a patch-cut layout the intent of which is to maintain the old-growth habitat characteristics of the existing forest. As with every other proposed sale, the DOF should describe the expected, or likely, destination of the logs from the sale, i.e., whether to a local mill, a more distant mill, or round-log export. It is not enough for DOF to recite the general goal of supporting mills, timber-industry jobs and generally boosting the local economy. In order for the public to make an informed decision about the desirability of a particular sale, the public must have a more specific sense of the likely economic benefits or detriments to the local community. Further, when deciding whether to propose and then proceed with a timber sale, the DOF should consider the economic benefits of alternative economic uses of state forest land, such as for subsistence and personal use hunting and fishing, recreation, commercial guiding, and commercial tourism, all of which are highly impacted, if not precluded, by logging. For example, the expressed desires of a community that the state preserve the community's options for an expanded local visitor economy by abandoning or making substantial changes in a proposed timber sale should be heeded.	
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	Aerial imagery from the harvest area shows historic movement of Patterson Creek across the flat landscape. We recommend DOF plan to retain timber in the 100–300 ft riparian management zone for the maintenance of important fish and wildlife habitat. Aerial imagery and GIS analysis suggest there may be unidentified anadromous streams within the proposed harvest units. ADF&G Habitat staff plan to visit the area in 2025 to conduct anadromous waters surveys and will coordinate with the Division of Forestry at that time.	
Michael Duman, PEAK Engineering, LLC	This would be a good area for purchaser layout.	
	Fredrick Point Area	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	The Fredrick Area sale, located in the Northern Pacific Alaskan coastal forests region, is part of the Temperate Conifer Forests biome and features predominantly snowy, humid conditions with warm summers. The proposed sale area spans 86.53 hectares in a lowland	

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	region. As of 2010, 98% of the Fredrick Area's land cover was tree cover with canopy densities exceeding 75%. From 2001 to 2023, the area lost less than 1 hectare of tree cover, representing a 0.54% decrease since 2000. However, in the larger surrounding region of 27.62 thousand hectares, tree cover loss totaled 881 hectares, a 3.9% reduction during the same period. This cumulative loss highlights ongoing fragmentation of forest habitats. Logging this sale area would exacerbate forest fragmentation and reduce the ecological integrity of the larger area's habitat.	
Michael Duman, PEAK Engineering, LLC	I would like to see some timber sales in this area sooner than in the proposed schedule. Sales starting in the fiscal years 25- and 26 would be ideal. This would be a good area for purchaser layout.	
	South Mitkof and Woodpecker Cove Area	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	South Mitkof and the Woodpecker area represent important ecological habitats. These areas are home to diverse mammal species supported by the nearby Stikine River wildlife corridor. Despite these values, logging has left only 24 percent of the large-tree old growth intact in watershed-scale reserves, significantly reducing essential habitats for black bears (*Ursus americanus*) and Sitka black-tailed deer (*Odocoileus hemionus sitkensis*). The availability of summer habitat for black bears and winter habitat for Sitka black-tailed deer has significantly declined from historical levels. These islands also lack adequate protected areas to safeguard critical habitat, with only a small fraction under congressional protection. These areas have exceptional estuary values due to their highly erodible slopes, a rare feature in regions without major rivers. The Rocky Pass estuary, ranked as the third highest among island estuaries, exemplifies this unique ecological significance. However, the same erodibility that creates these rich habitats also makes the area susceptible to landslides when subjected to logging. Studies have shown that on Mitkof Island, wintering deer prefer south-facing, low-elevation slopes—precisely the areas targeted by these timber sales. Protecting these lands is critical for maintaining their ecological integrity, including salmon habitats, estuary systems, and the cultural resources essential to nearby communities like Petersburg and Kake. At minimum, if logging is to proceed, it should be by patch cut to provide for habitat sustainability. Also, corridors of unlogged old-growth should be left to facilitate migration of deer upslope to the alpine in summer and back down in winter. Any layout should be especially protective of highly erodible slopes.	
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	Woodpecker Cove Area The low elevation south-facing old growth timber in the Woopecker Cove area provide important habitat for Old-growth associated or dependent species such as American martens and Queen Charlotte Goshawks, and Sitka black-tailed deer. The management goal for the Unit 3 deer population is to achieve and maintain a population of 15,000 deer while maintaining an annual harvest of at least 900 deer. The estimated deer harvest in Unit 3 was	

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	817 in 2022, up from an average of 730 deer between 2017 and 2021. South Mitkof Area Anadromous streams of interest include stream #108-40-10660, #108-40-10600, #108-40-10648, #108-40-10632, #108-40-10550, #108-40-10602, and #108-40-10576 however, these streams are short and are separated from the harvest by the Mitkof Highway.	
Michael Duman, PEAK Engineering, LLC	South Mitkof Area I would like to see some timber sales in this area sooner than in the proposed schedule. This would be a good area for purchaser layout. Woodpecker Cove Area This would be a good area for purchaser layout.	
	El Capitan Passage	
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	The proposed timber harvest area in C069S079E Section 4 is seemingly owned by USFS, so they likely cannot harvest there due to lack of ownership. This needs to be reviewed by DOF. In C069S079E Section 5 there are multiple aquatic farm lease areas under ADL 107834 that are adjacent to the proposed timber harvest area. I am unsure of the impact a timber sale would have on these areas, but I could imagine that being where they would want to have an LTF. I would consult with the aquatic farms section on this.	Sale area adjusted, USFS ownership removed Aquatic farm parcels EC1-EC5 (ADL 107834) located in El Capitan Island bay Contacted Kate Dufault, DMLW, in regards to aquatic farm leases and potential impacts
Kate Dufault, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	I've reviewed the information and there are a few potential impacts to the nearby aquatic farm lease parcels. The parcels are used for intertidal growth of shellfish, which depend on water quality for successful growth. If erosion or runoff results in increased sediment in the water, that could impact the growth of the shellfish. The same concerns would apply to any fuel or other hazardous material spills that could runoff into the cove from upland activities or occur with increased vessel traffic. Another potential concern is maintaining adequate access to the aquatic farm parcels if vessel traffic or mooring occurs nearby. I would request that should the El Capitan Passage harvest require a BIF, that the leaseholder be included in the public comment period.	Lease held by: RYGGS, JERRY PO BOX NKI 436 KETCHIKAN AK 99950
	Whale Pass Addition	

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Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	The proposed timber harvest area in C066S079E Section 35 & 26 is almost entirely within municipal entitlement conveyed to Whale Pass, so this may prevent harvest due to lack of ownership and management authority. ADL 108743	Noted area removed from sale
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	The northern portion of this area borders anadromous stream 106-30-10770 and will require a retention area. Based on recent stream surveys there are no other anadromous streams located within nor adjacent to any other parts of the harvest area.	
	South Thorne Bay Area	
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	A significant portion of the proposed timber harvest area in C072S084E Section 4 and 10 is within land that has been conveyed to the University of Alaska, so this may prevent harvest due to lack of ownership and management authority. QCD 1395	Ownership verified as SOA, reference Patents 50-2007-0530 and 50-85-0436, BLM Plats T71SR84E and T72SR84E
	Tyee Area	
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	The proposed harvest area in C065S090E Section 21 is within a Federally reserved transmission line right-of-way of the Alaska Power Authority, Project No. 3015, AA-59059, Subject to Sec. 24 of the Federal Power Act. I am unsure if we have the management authority to sell timber on these lands, or if concurrent use must be sought with the federal government. The proposed harvest area in C065S090E Section 21 is within ADL 106841, which is land leased to the Southeast Alaska Power Agency. This leasehold is part of the Four Dam Pool project; a FERC licensed/regulated Tyee Lake Hydroelectric Project. Alaska Mapper does not show Resource Sale layer proximate to leasehold. I am unsure of the potential impacts of a timber sale on this authorization, or if DNR has enough management authority over this area to sell timber. The proposed harvest area in C065S090E Section 20 and 21 intersect with ADL 106442 and ADL 104833, which are easements for the Southeast Alaska Power Agency to access their leased land. These are part of the Four Dam Pool project; a FERC licensed/regulated Tyee Lake Hydroelectric Project. Ensuring concurrent use of these with a timber sale would be critical.	Consulted with Mason Auger, DMLW easement specialist

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Mason Auger, DMLW (Department of Natural Resources, Division of Mining, Land and Water) easement specialist	Regarding the Tyee Proposed Sale, area authorizations are ADL 103426, utility easement ADL 104833, utility easement ADL 106442, utility easement ADL 106841, public & charitable lease – formerly Four Dam Pool Power Agency, now Southeast Alaska Power Agency or SEAPA ADL 106842, public & charitable lease ADL 108297, utility easement All authorizations are held by SEAPA and connected with Power Project 3015. Of these, ADL 106841 is by far the largest parcel. In my cursory reading of the agreement, I do not see any language or stipulations precluding DOF timber harvest activity. However, Attachment A includes stipulations DOF should be aware of on page 2 and page 3 (see attached). ADL 106842 is a separate tideland lease, but otherwise the same lease agreement (including Attachment A) as ADL 106841. Proposed timber sale activity appears to overlap with two or more area easements and one or more area leases in sections 20 and 21. Coordination with SEAPA is recommended. Power Project 3015 encompasses all of Tyee Lake. I also note Power Project 3015 includes a parcel running from the north shore of Tyee Lake across section 28 and into section 29. The north and south segments of this parcel are encompassed by ADL 106841 and are on tentatively approved or patented state land. The large segment crossing section 28 is not. Power Project 3015 includes another small parcel in section 14. This parcel location is near proposed timber sale activity. Lastly, Power Project 3015 includes a line parcel that is more or less encompassed by utility easements ADL 104833 and ADL 106442. Proposed timber sale activity in sections 20 and 21 may overlap with this parcel.	Harvest does not appear to be restricted by easements. Coordination needed with SEAPA for operations to occur.
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	Habitat recently surveyed this area and the FYSTS map includes the most recent AWC updates. We have no other comments for this sale area.	
Michael Duman, PEAK Engineering, LLC	This would be a good area for purchaser layout.	
	Herring Cove	

Commenter	Comment	Adoption Action
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	The proposed harvest area in C075S091E Section 25 is within a Federally reserved transmission line right-of-way for Power Project No. 1922 (AA-57746), for the purpose set forth in and subject to the conditions and limitations of Sec. 24 of the Federal Power Act of June 10, 1920 as amended, 41 Stat. 1075, as amended, 16 U.S.C.818 (2000). I am unsure if we have the management authority to sell timber on these lands, or if concurrent use must be sought with the federal government.	Consulted with Mason Auger, DMLW easement specialist
Mason Auger, DMLW (Department of Natural Resources, Division of Mining, Land and Water) easement specialist	Regarding the Herring Cove Proposed Sale, there are several easement authorizations located in the area ADL 107190 – issued to KGB ADL 107568 – issued to KGB ADL 103302 – issued to DOT In my cursory reading of the above easement agreements, I do not see any language or stipulations that would preclude DOF timber harvest activity. Coordination with authorization holders is, of course, recommended. The Herring Cove Proposed Sale map indicates potential overlap with Power Project 2328 (Whitman Lake). I cannot speak to potential issues, if any, with the proposed timber harvest and Power Project 2328.	Harvest does not appear to be restricted by easements. Coordination needed with stakeholders for operations to occur.
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	This area is located on lands designated Habitat and Recreation. Harvest in this area is indicated as inappropriate in the area plan. We concur with the area plan.	
	Northeast Coffman	
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	A significant portion of the proposed timber harvest area in C067S081E Section 33 and 34, and C068S081E Section 3 is involved in a land sales project. ADL 108063	No active land sales per Timothy Shilling, DMLW Competitive Land Sales Manager
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	A portion of this sale area is located between anadromous streams 106-30-10250 and 106-30- 10220 and their estuaries. Access will require crossing the upper uncatalogued portion of stream 106-30-10250. This area, because of connectivity, has the potential to contain fish habitat. The Habitat Section should be consulted in the consideration of a crossing structure for this area. Field recognizance may be required.	Consult with ADFG for stream crossing
	Heceta Island	

Commenter	Comment	Adoption Action
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	A significant portion of the proposed timber harvest area in C070S078E Section 7, 8, 17 and 18 is involved in a land sales project. ADL 108358. For the proposed timber harvest area in C070S078E Section 7, 8, 17 and 18, there is a tideland lease near this area under ADL 107008 for a lodge. Logging activity near or in vicinity of this leasehold could have negative impacts on the leaseholder There are also a few easements issued to USFS in this area under ADL 103939. This easement is for a former LTF that is very close to ADL 107008. They applied in February 2022, for renewal, but as a boat ramp/access. The status of this case is AIR 7/27/23 until "issues w/103939 and 109058 are resolved.". ADL 103939 was paused due to language issues within the easement. USFS didn't like the language in either, and they went to LAW. ADL 109058 is in EA status now. This could present issues for a timber sale if this is a desirable location for an LTF since concurrent use can't be guaranteed.	No active land sales per Timothy Shilling, DMLW Competitive Land Sales Manager
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	The southern boundary of the northern part of the area is located to the estuary of ADF&G catalogued stream 103-90-10470. We would like to stress the importance of estuarian areas for both wildlife and anadromous fish use. Care should be taken to ensure that a proper estuarian no harvest buffer be incorporated into the harvest plan for this area.	
	Uphill Nanny Area	
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	A significant portion of the proposed timber harvest area in C073S084E Section 35 is involved in a land sales project. ADL 109010	No active land sales per Timothy Shilling, DMLW Competitive Land Sales Manager
	Upper Twelvemile Arm	
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	A significant portion of the proposed timber harvest area in C074S083E Section 7, 18, and 17 is involved in a land sales project. I am unsure if this affects the ability to do a timber sale. ADL 109231.	No active land sales per Timothy Shilling, DMLW Competitive Land Sales Manager
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	This sale area borders the Harris River, ADF&G stream 102-60-10820 to the West. A no-harvest area of at least 300 feet has been included along the Harris River. We have no other concerns with this area.	
	East Cholmondeley	

Commenter	Comment	Adoption Action
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	A significant portion of the proposed harvest area in C077S088E Section 15, 14, 13, 7, and 8 is involved in a land sales project. ADL 108356 The proposed harvest area in C077S088E Section 15 is directly adjacent to LAS 30251, which is a series of commercial recreation floats. I am unsure of the potential impacts of a timber sale on this authorization.	
Timothy Shilling, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water) Competitive Land Sales Manager	We reviewed the FYSTS. Our only *potential* objection would be the Cholmondeley Sound timber sale. This area is an active land sale project area (ADL 108356). This proposed timber sale appears to be on the 2030 schedule, though we were hoping to authorize the land sale much sooner. We'd like to talk about this one in more detail. The Cholmondeley sound area is rather unique with a number of small bays and protected waters. Although a timber sale in advance of a land sale could occur, our concern is primarily whether the sale would alter the character of the area sufficient to detract from the offering. We can certainly discuss this one in more detail later. As to the rest of the proposed areas, LCS has no objection to potential future timber sales. There are a number of areas where the proposed timber sale areas overlap with either areas designated settlement, or areas with active project areas. In these cases we would just ask for additional coordination with LCS in advance of a timber sale. This could allow us the opportunity to plan for access (i.e. coordinate on location or scope of road development where possible), or potentially coordinate on any area plan amendments if necessary. We recognize that in order to utilize any forestry roads we will have to coordinate on timing prior to DOF&FP closing the roads, or deal with mitigation after.	DOF will coordinate with LCS for sales in settlement and active project areas
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	Several catalogued anadromous streams are located within this sale area. Existing access consists of Forest Service roads which appear to have several stream crossing structures associated with it. ADF&G questions the status of these stream crossing structures as providing adequate fish passage. An inspection may be warranted to determine if any of the structures require repair or replacement.	USFS roads cross AWC steams 102-40-10130, 102-40-10110, and 102-40-10090 adjacent to sale areas. Field inspections to be completed in the event of sale layout.
	George Inlet East	

Commenter	Comment	Adoption Action
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	The proposed harvest area in C073S092E Section 20 and 17 intersect with ADL 107613 which is an easement for the DOTPF for a permanent roadway (Shelter Cove Rd) in Ketchikan. The status of this authorization is uncertain. An EA was extended in 2021 but has probably expired. I am unsure of the effect a timber sale would have on this.	
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	A portion of this harvest area is located in the Central Southern Southeast Area Plan (CSSEAP) polygon K-50, designated as Habitat (Ha). This area is located around a salt lagoon (K-19) at the head of George Inlet. Aside from a DOT road constructed in 2013, the construction of which was included in the CSSEAP, K-50 is in a natural, unharvested state and provides upland habitat for deer, bear, wolves and other smaller animals and birds. There are also four cataloged anadromous streams that flow into the salt lagoon and provide habitat for pink, chum, and coho salmon as well as cutthroat trout, Dolly Varden char, and steelhead. This area has been previously discussed and a small amount of harvest west of the DOT road was agreed to. The current area proposed for harvest includes a portion of the Ha designated lands to the east of the salt chuck. To maintain the integrity of K-50, we recommend against any harvest within K-50 east of the DOT road. The land class information on Table 1 for the George Inlet Area failed to include Ha with the Gu/S classifications.	Table 1 revised to include Ha classification
	Suemez Area	
Tony Keith, DNR DMLW (Department of Natural Resources, Division of Mining, Land and Water)	Range 80 E and Range 79 E are reversed on the vicinity map for Suemez Area since Port Dolores is in Range 79 E, but the vicinity map says that it is in Range 80 E. This greatly changes the location of the proposed timber harvest area if you go off the vicinity map, which is the only part on the page that states the Range.	Vicinity map revised
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	Access to this sale area will include crossing catalogued stream 103-50-10610. The crossing structure chosen for this location will require fish passage and a fish habitat permit. Stream surveys conducted in 2019 identified all other anadromous fish habitat in the area.	
	Naukati Area	
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	The northwest portion of this area borders catalogued stream 103-90-10140-2004. A minimum 200-foot no-harvest area should be left along this waterbody to protect anadromous fish habitat. The road accessing the central part of the area along the north shore of Kaikli Cove will require crossing catalogued stream 103-90-10240 which is important for coho and pink salmon, and Dolly Varden char. Anadromous fish passage will be required at this location.	200 ft buffer added. Total acreage reduced from 511 to 504
	Control Lake Area	

Commenter	Comment	Adoption Action
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	The northern portion of this area is located adjacent to catalogued stream 103-60-10290 and will require a retention area. There are no other fisheries concerns with this area.	
	Earl West Cove	
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	Although ADF&G has previously determined the extent of anadromous fish habitat in the area, the timber sale map incorrectly displays several anadromous streams as "Water Quality Streams" (see attached map) including: - Stream Nos. 107-40-10820, 107-40-10820-2007, 107-40-10820-2008, 107-40-10820-2012, 107-40-10820-2012-3010, 107-40-10820-2018; - Stream No. 107-40-10812; - Stream No. 107-40-10800; - Stream No. 107-40-10794; - Stream No. 107-40-10790; - Stream No. 107-40-10784; - Stream Nos. 107-40-10780, 107-40-10780-2004, 107-40-10780-2003, 107-40-10780-2013, and 107-40-10780-2002.	AWC streams verified on timber sale map
Michael Duman, PEAK Engineering, LLC	This would be a good area for purchaser layout.	
	Traitors Cove West	
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	Remote Recreation classified lands. There are no known anadromous streams located in this sale area.	

Commenter	Comment	Action
	PROGRAMMATIC	
	Support for Timber Sales	
Tessa Axelson, AFA (Alaska Forest Association)	AFA is one of Alaska's oldest trade organizations representing a variety of members in the forest products industry in Alaska. AFA's members include small, medium, and large operators, tribal organizations, contractors, industry support organizations, and individuals from across the state of Alaska. AFA members are heavily reliant on supply from the State of AK to ensure the long-term viability of our industry. Our membership provides approximately $50 MM in annual revenues to southeast Alaska. Without the guarantee of supply from the State of AK hundreds of local, family-wage jobs, and our broader contribution to the southeast economy will be jeopardized. Nothing less than the survival of our members' small businesses hangs in the balance.	
	Carbon Sequestration/Carbon Credits	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	Aligned with Governor Dunleavy's economic policy proposals, DOF should evaluate the potential economic benefits of carbon credits from standing forests. This analysis should compare these benefits to the significant fiscal losses the state incurs from timber subsidies. With the passage of SB48, pursue carbon credits as an alternative revenue source. Maintaining old-growth forests provides more long-term benefits than timber sales. Given the net loss of timber sales, the subsidization of the timber industry, carbon offset purchases offer both protection, as well as a more viable economic incentive.	
	Clearcut Harvest System	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	To the greatest extent possible, DOF should shift its focus to patch-cutting, with the objective of maintaining habitat and ecological relationships over the long term.	
	Consultation	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	Consult with Alaska Native Entities and Individuals: In every case, the DOF should consult closely with appropriate Native entities and individuals, in order to ensure that all subsistence and cultural needs and practices are preserved.	

Commenter	Comment	Action
	Engage in Community Consultation: In every case, the DOF should hold hearings in the communities closest to the sale before making the decision whether to include the sale in the final 5-year schedule.	
	Environmental Risks	
Andrea Cameron, Amber Locke, Janiene Licciardi, Gary Goetz, Morgan Rae, Susanne Badilla, Jim Power, Ariel Rolfe, Marvin Willard, David Lesh, Sondra Stanway, Jan Crichton, Terri Yeager, Philip Ratcliff, Ken Goldsmith, Eric Syrene, Kayla Wyatt, K Murphy, Scott Pearce, Linda Walters, Alexis Alamillo, Clinton Welburn, John Torrey, Sandra Ashmore, Bruce White, Michele Cornelius, Maureen Wahl, Terry Cummings, Rebecca Lexa, Maggie Rabb,	Consider Environmental Risks Targeted sales of lowland old-growth forests exacerbate habitat fragmentation and disrupt watersheds vital to wildlife and fisheries. Logging damages streams and watersheds that are necessary for salmon and other species Alaskans depend on, endangering the ecological stability and safety of nearby communities. The increased erosion and risk of landslides caused by deforestation damage these habitats while causing lasting harm and putting nearby communities at risk	
	FYSTS Planning, Sustained Yield, AAC, Cumulative Impacts	
Tessa Axelson, AFA (Alaska Forest Association)	AFA members also rely on a mix of Old Growth (OG) and Young Growth (YG) sales to support the regional, national, and international markets that utilize forest products from the Tongass. OG wood products from the Tongass are required for the sound boards of grand and baby grand pianos and the tops of acoustic guitars. Without the inclusion of sales such as Kosciusko Island in the FYSTS AFA members cannot bring music to the country and the world. Tongass OG wood products are also required for materials used in the nation's defense and space infrastructure, not to mention the continued demand in markets for decking, siding, fencing, staircases, garage doors, etc. There is no replacement in the region, in the country, or in the world for wood products from the Tongass and the DOF plays a crucial role in supplying and retaining our industry.	
Tyler Breen, SEACC	The Alaska State Constitution mandates that fish, forests, wildlife, grasslands, and all other	

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(Southeast Alaska Conservation Council)	replenishable resources belonging to the State must be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses (Article 8, Section 4). Harvesting old-growth forests fails this mandate because these ecosystems require a time period for regeneration beyond the rotation cycle employed by the state, making their extraction inherently unable to be sustained. The continued logging of old-growth stands, especially in Southeast Alaska, not only depletes irreplaceable habitats but also contradicts the Constitution's directive to prioritize long-term resource viability in favor of propping up an industry already operating at a loss.	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	Analyze proposed sales in the context of cumulative deforestation across ownerships, including impacts on watersheds and wildlife corridors.	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	As a general matter, for each and every timber sale proposed, the DOF should explain where the cut timber will be going, and whether the logs will be processed in Southeast Alaska or exported in the round. Only then can the public judge the relative impacts and desirability of a given timber sale. For example, are the logs resulting from sales in the Petersburg area expected to be sawn by a local mill, or perhaps rafted and towed to Viking Lumber in Klawock? Or stored until exported in the round?	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	For all proposed sales, provide detailed information about the target purchaser(s) of the sale, and whether the sale is likely to be locally milled, processed by a distant mill, or merely exported in the round.	
Andrea Cameron, Amber Locke, Janiene Licciardi, Gary Goetz, Morgan Rae, Susanne Badilla, Jim Power, Ariel Rolfe, Marvin Willard, David Lesh, Sondra Stanway, Jan Crichton, Terri Yeager, Philip Ratcliff, Ken Goldsmith, Eric Syrene, Kayla Wyatt, K Murphy, Scott Pearce, Linda Walters, Alexis Alamillo, Clinton Welburn, John Torrey,	Better Alternatives for Sustainable Management The state should focus on managing young-growth forests with a rotation cycle that allows for old-growth characteristics to develop. Selective harvesting rather than clear cuts should be used to maintain ecological functions while providing timber resources. Encouraging local processing industries would maximize economic benefits, create jobs, and reduce reliance on exporting unprocessed logs. I respectfully urge the Alaska Department of Natural Resources to revise the Five-Year Timber Sales Plan to reflect modern environmental and economic priorities. Protecting irreplaceable old-growth forests and adopting sustainable management practices will ensure that Southeast Alaska’s unique ecosystems continue to thrive, providing benefits to both the environment and local communities.	

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Sandra Ashmore, Bruce White, Michele Cornelius, Maureen Wahl, Terry Cummings, Rebecca Lexa, Maggie Rabb,		
	Old Growth Management	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	It is important to distinguish between high-volume and low-volume old-growth in terms of their ecological roles, importance, and the disproportionate selection of particularly ecologically valuable and vulnerable high-volume habitats for harvest. High-volume old-growth constitutes less than 3% of Southeast Alaska's total forest volume. These forests provide the greatest ecological benefits but are disproportionately targeted for logging due to their economic value. These stands are irreplaceable in their ability to support biodiversity, store carbon, and maintain ecosystem resilience. Key habitat characteristics of old-growth forests include structurally complex canopies, large trees, standing snags, downed logs, and a diversity of understory vegetation. These features provide critical habitats for species such as Sitka black-tailed deer (*Odocoileus hemionus sitkensis*), which depend on snow interception and accessible winter forage, and Queen Charlotte goshawks (*Accipiter gentilis laingi*), which require large trees and open subcanopy layers for nesting and foraging. A larger, non-exhaustive, list of other species that require the ecosystem services provided by old-growth habitats is included at the end of this comment letter. These species serve roles within the broader Southeast Alaska ecological context as well as provide economic opportunities, such as fisheries. Old growth habitats support these complex systems. Forests over 150 years old with an uneven age distribution are found to be more utilized by a broader array of species and offer utility as overwinter habitat. As highlighted in scientific literature, old-growth forests provide irreplaceable ecological functions: Biodiversity Hotspots: Old-growth forests offer critical habitats for species such as those noted above, as well as black bears (*Ursus americanus*), brown bears (*Ursus arctos*), marten (*Martes americana*), river otter (*Lontra canadensis*), and are essential for salmon (*Oncorhynchus spp.*) spawning due to their role in maintaining stream health. Carbon Sequestration: The Tongass serves as a globally significant carbon sink, storing approximately 8% of all carbon found in U.S. forests. State of Alaska forest lands add to this sequestration as the continuation of ecosystem services is not delineated by ownership boundaries. Logging these forests diminishes their ability to mitigate climate change, a function critical for both local and global resilience. Globally, carbon sink functionality is	

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	collapsing due to deforestation, wildfires, and climate change. Deforestation has degraded the majority of the world's forests, with significant consequences for global carbon storage. Temperate forests, specifically those in Southeast Alaska, face increasing pressures that further threaten their role as carbon sinks. Cultural and Subsistence Values: For Alaska Native communities, old-growth forests are integral to cultural practices, providing materials for traditional uses and supporting subsistence lifestyles. Indigenous integration of cultural and ecological values goes beyond the utilitarian valuation of timber stands. DOF must protect the subsistence and other Native cultural values of Alaska lands, and not carry out any logging that would harm those values. DOF should consult closely with federally recognized tribes or other appropriate Native organizations to ensure that DOF understands the full range of values at stake and assure that the proposed timber sales will not harm those values. Prioritize Old-Growth Preservation: Limit old-growth logging to small-scale, culturally significant uses by local communities.	
Andrea Cameron, Amber Locke, Janiene Licciardi, Gary Goetz, Morgan Rae, Susanne Badilla, Jim Power, Ariel Rolfe, Marvin Willard, David Lesh, Sondra Stanway, Jan Crichton, Terri Yeager, Philip Ratcliff, Ken Goldsmith, Eric Syrene, Kayla Wyatt, K Murphy, Scott Pearce, Linda Walters, Alexis Alamillo, Clinton Welburn, John Torrey, Sandra Ashmore, Bruce White, Michele Cornelius, Maureen Wahl, Terry Cummings, Rebecca Lexa, Maggie Rabb,	Preserve Old-Growth Forests Old-growth forests make up less than 3% of Southeast Alaska’s forests, making them both rare and deeply important. They are irreplaceable for biodiversity, carbon storage, and cultural values. Logging these forests causes irreversible damage, destroying habitats vital for species like salmon, which hold cultural, subsistence, and economic importance. These forests are among the most effective tools we have for addressing climate change by storing carbon. Logging not only compromises this role but also increases vulnerability to landslides and other climate-related risks. Policy and Constitutional Concerns The Alaska State Constitution requires the sustainable use of resources. Logging old-growth forests, which require centuries to regenerate, directly violates this principle. Current practices prioritize a shrinking industry over long term public and ecological benefits, undermining state policies on resource conservation and sustainable development.	

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	Young Growth Management	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	Best practices for young-growth management emphasize extended rotations and structural complexity to restore ecological functions akin to old-growth. Second-growth forests undergo a "stem-exclusion" phase after 35 years where biodiversity and understory forage decline sharply. To mitigate this, silvicultural treatments like selective harvest, an absolute cessation of clearcuts, and extended rotations exceeding 150 years are recommended to accelerate recovery of uneven-aged characteristics and improve wildlife habitat suitability. This approach should be coupled with a focus on local economic benefits, emphasizing sales for cultural use and to smaller-scale operators who supply local markets, reducing reliance on round-log exports and emphasizing value-added processing within Alaska.	
	Economics	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	Logging in Southeast Alaska has often been demonstrated as unprofitable on both state and federal land, with costs of preparation and execution frequently outweighing revenues. An analysis by Taxpayers for Common Sense highlights persistent economic losses in timber sales in the Tongass, with infrastructure costs, including road construction, significantly exceeding revenues. As a regional example, historical losses for US Forest Service sales averaged $44 million annually between 1980 and 2019, reaching $16.1 million in 2019 alone. The average loss per thousand board feet (MBF) averaged $612 between 1999-2018, reflecting heavily subsidized and inefficient sale structures. For state sales, the DOF's 2014 annual report displays statewide revenues from the timber program over the past ten years of $6.99 million, or about $699,000 per year. From 2012-2014, the DOF's annual reports showed a statewide timber program cost of $5.3 million, $5.8 million, $5.9 million, and $6.9 million, respectively. In other words, the program operates at a loss, with returns as low as 10 to 13 percent of the timber sale program cost. The DOF's reports do not break down revenues by region. But coastal southeast Alaska provided 100,408 thousand board feet (MBF) out of a statewide 237,916 MBF decadal harvest, or 42 percent of the state's sold timber volume. Revenues from southeast Alaska could be less than $300,000 per year assuming equal revenues per MBF sold. More recent data suggests that the situation now is very similar. The 2018 total direct revenue from southern Southeast timber sales was $477,408. The forest management budget that year cost $7.3 million. The 2021 report shows timber receipts of $683,000 and a budget of $5.1 million. These trends underscore the large state subsidies and broader economic challenges inherent in logging operations in Southeast Alaska, highlighting the need for economically and ecologically viable forest management strategies that minimize subsidies and prioritize long-term economic and ecosystem benefits.	
Tyler Breen, SEACC	When evaluating whether to propose or proceed with a timber sale, and whether it is	

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(Southeast Alaska Conservation Council)	beneficial to exclude other economic and non-economic uses of the forest by logging. Widespread logging across all land ownerships on Prince of Wales in particular has resulted in substantial loss of deer habitat and resulted in a significantly reduced opportunity for personal-use hunting, which harms residents economically. When proposing a timber sale for the 5-year schedule, the DOF should articulate this trade-off clearly.	
Andrea Cameron, Amber Locke, Janiene Licciardi, Gary Goetz, Morgan Rae, Susanne Badilla, Jim Power, Ariel Rolfe, Marvin Willard, David Lesh, Sondra Stanway, Jan Crichton, Terri Yeager, Philip Ratcliff, Ken Goldsmith, Eric Syrene, Kayla Wyatt, K Murphy, Scott Pearce, Linda Walters, Alexis Alamillo, Clinton Welburn, John Torrey, Sandra Ashmore, Bruce White, Michele Cornelius, Maureen Wahl, Terry Cummings, Rebecca Lexa, Maggie Rabb,	Stop Funding a Failing Industry Logging operations in Southeast Alaska often operate at a financial loss. Infrastructure costs, such as road building, frequently exceed revenues generated from timber sales. The reliance on exporting unprocessed logs eliminates opportunities for local value-added industries that could create jobs and sustain economic growth. Public funds should not subsidize unsustainable practices.	
	Land Classification and Use	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	Alaska Statute 38.04.005(b) mandates that in classifying and making state land available for private settlement, the director must seek to minimize adverse effects on wildlife, fisheries, minerals, timber, and other significant resources. Yet, in its analysis of the proposed timber sales, DOF appears to misuse potential future settlement as a way to evade that mandate – by explaining that since settlement inherently conflicts with these other resource values, the proposed timber sales do not need to incorporate them where the land is classified for settlement. Rather, DOF needs to fully recognize these values in all of its timber planning, and when settlement is actually proposed, harmonize settlement with these values. This policy reflects a broader obligation to protect and sustain natural resources while balancing public and private land uses. Logging of old-growth forests contradicts this principle by creating extensive habitat fragmentation and long-term ecological damage, adversely	

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	affecting species dependent on these ecosystems, including salmon species. The continued focus on old-growth timber sales fails to account for ecosystem services such as landslide prevention, fishery jobs, and carbon storage, which are critical for community well-being and climate mitigation. Additionally, the statute emphasizes preserving public open spaces, a goal undermined by the aggressive removal of old-growth stands.	
	Purchaser Layout	
Tessa Axelson, AFA (Alaska Forest Association)	AFA encourages the DOF to continue to consider purchaser layout as requested by operators for future sales.	
	Round Log Export	
Tyler Breen, SEACC (Southeast Alaska Conservation Council)	The number of timber mills in Alaska peaked in the 1980s, with more than 20 mills in operation. Since then, the number has steadily declined, reaching just four mills by 2019. Although a 2021 timber mill survey reported eight new mills by adjusting survey criteria, this does not reflect actual growth or momentum in the industry. Instead, mills across the region operate at just 11-16% capacity utilization—45-50 percentage points below industry norms. This low utilization is representative of broader inefficiencies in the timber industry, which continues to operate at a loss. Few operators, underperforming mills, and state-subsidized timber sales that ultimately lose money demonstrate the need to rethink the economic model for Alaska's timber sector. Along with the dwindling number and variety of mill operators, more of Southeast Alaska's timber is sold and exported as round logs. The export of unprocessed logs from Alaska results in significant economic losses by missing opportunities for value-added processing. This reliance on exporting raw materials creates a dependency on external markets, makes Alaska vulnerable to fluctuations in global demand, and limits capacity to transition into more value-added manufacturing — further entrenching our economy in a structural disadvantage. By prioritizing the export of round logs, Alaska foregoes the potential for local job creation and revenue from sawmills and manufacturing industries. Ultimately, a resource export focus keeps Alaska in the position of a material colony, rather than a self-directed developed market.	
	Wildlife	
Winston P. Smith	**Prince of Wales Flying Squirrel:** <u>Natural History, Ecology, and Conservation</u> Northern flying squirrels (*Glaucomys sabrinus*) are gliding, arboreal small mammals that rely on mature coniferous (western North America) or mixed-hardwood conifer forests (Smith 2007a, Smith 2012a); this species throughout its range achieves its highest densities in uncut (Holloway and Smith 2011) or old-growth forests (Smith 2012a). The vegetative	

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	diversity and structure of old-growth forests facilitate its safe, efficient locomotion and provide an abundance and variety of food types and sources. The Prince of Wales flying squirrel (*G. s. griseifrons*) is an endemic of Prince of Wales Island and nearby islands off POW's western coast (Dall, Long, Kosciusko, Tuxekan; MacDonald and Cook 1999). The entire geographic range of this unique subspecies is limited to POW and these associated islands. This subspecies has the lowest genetic diversity of all northern flying squirrels in North America (Bidlack and Cook 2001; Arbogast and Schumacher 2011). Consequently, it is especially vulnerable to inbreeding with significant additional negative demographic consequences for isolated populations that currently exist (Smith et al. 2011; Smith and Flaherty 2023) and become isolated as a result of further habitat loss and fragmentation across its range, which limits dispersal and prevents demographic and genetic rescue. One might question the importance of this endemic as a member of the rainforest ecosystem; so, what if it becomes locally extirpated? Flying squirrels have an obligate mutualistic relationship with young spruce and hemlock seedlings that results in successful regeneration and development of the two dominant canopy species. Through the consumption of truffles and spreading of spores throughout the forest, flying squirrels facilitate the transfer of nitrogen-fixing bacteria to developing seedlings; they help grow their own habitat (Smith 2007a)! Smith and Nichols (2003) and Smith et al. (2005) demonstrated that productive old-growth forest (POG) is the primary habitat of the POW flying squirrel. Although squirrels do occur in non-commercial forests, these habitats are "sinks" (Smith et al. 2011) and do not support breeding populations (Smith and Person 2007). Managed habitats (i.e., recent clearcuts and second-growth) do not support flying squirrel populations and empirical evidence indicates that regenerating forest patches ≤40 yrs. old are selected against at the broader scale (Shanley et al. 2012); flying squirrels rarely even move through those habitats (Smith 2007a, Holloway and Smith 2011, Smith 2012a). Thus, across managed landscapes POG is the only cover type that supports breeding populations of POW flying squirrels. Habitat patches require ≥73% old-growth forest cover or a minimum total area of 73 ha (170 acres) of old-growth forest to be even occupied by flying squirrels (Shanley et al. 2012). To sustain isolated breeding populations for an extended period (50 years) with a high probability (0.95), old-growth reserves need to be over 5000 ha (12,500 acres) and comprised of 100% POG); the existing small OGRs (designed for flying squirrels; USDA Forest Service 1997) have about an 80% probability of supporting flying squirrel populations for 50 years (Smith	

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	and Person 2007). Smith and Person (2007) also reported that flying squirrels were not captured in a 40-ha (100 acre) patch of POG on Kosciusko Island that was surrounded by managed forest (≤40 year-old second growth), whereas a similar amount of effort captured several squirrels in a nearby large (several thousand acres) POG patch in the same landscape. The proposed timber harvest areas (and except for Honker Divide, all of north POW) is highly fragmented with few (if any) large (>10,000 acres) patches of 100% POG habitat. Thus, there are few (if any) OGRs or any POG habitat patches (except Honker Divide) in the project areas (and all of north POW) that likely can support POW flying squirrel populations in isolation (Smith et al. 2011). Any further logging of POG will further reduce the size of existing POG habitat patches, further fragment the landscape, disproportionally impact landscape integrity and connectivity, and thus increase the risk of local extinction in managed watersheds across north POW and other portions of its range in which isolated patches (separated by more 1 km of managed matrix) are less than 12,500 acres (5000 ha) of 100% productive old-growth. Because of their findings, Smith and Person (2007) concluded that POW flying squirrel populations across north POW need to be functionally connected (matrix is permeable to dispersal) to ensure viable populations in managed landscapes. However, several studies demonstrated that flying squirrels are unlikely to move through clearcuts or young second growth because they cannot perceive POG (while in second growth) beyond 50 m from the POG forest edge (Flaherty et al. 2008), and food availability in managed habitats is significantly less than POG (Flaherty et al. 2010a). Also, POW flying squirrels are unable to move efficiently and safely through managed habitats because the forest structure does not allow them to use their primary mode of locomotion (Scheibe et al. 2006); it costs flying squirrels more than twice the energy to run than glide (Flaherty et al. 2010b), and flying squirrels experience more predator attacks in managed habitats (most in clearcuts) than POG (Smith 2012a). An experimental study demonstrated that it takes POW flying squirrels 10X more time to move through clearcuts than POG (Smith et al. 2011), increasing the time 10-fold in which they are exposed to higher predator attacks and require more food to offset higher energy costs of transportation in habitats with less food (Flaherty et al. 2010a,b). 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 of additional old-growth timber harvests 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	

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	between POW flying squirrels and multiple members of its forest community (Smith 2012a), significant biodiversity is also at risk. **Queen Charlotte Goshawk:** <u>Natural History, Ecology, and Conservation</u> The Queen Charlotte goshawk (*Accipiter gentilis laingi*) is an endemic subspecies that lives in the temperate rainforest archipelagos of Southeast Alaska and coastal British Columbia (AOU 1957). The British Columbia Distinct Population Segment (DPS) was recently listed as a threatened DPS in Canada under the Endangered Species Act (Federal Register 2012). According to the status review associated with this listing, the Queen Charlotte goshawk (QCG) population is considered a meta-population of subpopulations occurring among the islands of British Columbia and Alexander Archipelagos and the mainland of Southeast Alaska south of the international border between Mount Foster and Mount Fairweather (USFWS 2007). However, based on an analysis of birds in this region Webster (1998) concluded the northern limit of the range of QCG was Baranof Island and the southern limit of Taku Inlet. Nevertheless, the viability of QCG hinges on maintaining as many (if not all) of the existing subpopulations (USFWS 2007, Federal Register 2012). Prince of Wales Island represents the largest amount of contiguous habitat available in the Alexander Archipelagos and may be the largest amount of contiguous habitat for QCG in the United States (Webster 1988). Therefore, maintaining sufficient habitat to support a QCG breeding population on POW is fundamental to maintaining the viability of the QCG. Below, I detail my rationale with the support of empirical data and analyses for the conclusion that existing secure habitat provided through the TLMP Conservation Strategy does not contribute sufficient breeding habitat for goshawk pairs in managed landscapes of the Tongass National Forest (Smith 2013). Indeed, only three active breeding pairs have been documented on POW since 2005, which was also the last time successful reproduction occurred. I undertook a spatially explicit analysis of the contributions of the Tongass conservation strategy elements (USDA Forest Service 1997) to goshawk breeding season habitat. Detailed methods and results of this analysis can be found in the peer-reviewed publication (Smith 2013). Because the nest protection provision (i.e., buffer surrounding each nest tree) of 40 ha (100 acres) prescribed under forest wide S&Gs represented the approximate size of a nest area (Reynolds et al. 1992), this analysis focused on the other two essential biological components: Post-fledging Area (PFA) and Foraging Area, using a database of known nest sites and published ecological data from southeast Alaska (Iverson et al. 1996). This analysis examined composition of habitat types and composition of landuse designations (LUDs) in	

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	hypothetical (virtual) PFAs and foraging areas surrounding 136 actual nest trees, the circular areas of which were determined according to goshawk movements in Southeast Alaska (Iverson et al. 1996) and based on concepts described by Reynolds et al. (1992) and Kennedy et al. 1994). Only 30% of nest trees had >51% of PFAs in preferred habitat; 55% had >51% in unsecure LUDs, whereas only 16% had >51% in a protected old-growth forest LUD. Foraging area composition was similar to PFAs, but proportions predominantly (>75%) available for development or with 26-50% of total area in preferred habitat was larger than PFAs, and half as many nests had the majority (>50%) of the foraging area in preferred habitat. Among covertypes, preferred habitat (Iverson et al. 1996) averaged 39.4% of the PFA (Smith 2013). These findings do not support the assumption that conservation measures contributing sufficient habitat to sustain well-distributed, viable populations of northern goshawks throughout Southeast Alaska (Smith 2013). Moreover, the expectation that, in intensively managed landscapes, preferred habitat contributed by other elements of the TLMP conservation strategy (e.g., old-growth reserves, riparian or shoreline buffers) will mitigate this deficiency was <u>not supported</u> by a spatially explicit analysis of 136 virtual PFAs created from actual nest sites. Below, I discuss in further detail why further logging in the project area will further reduce essential habitat for breeding goshawks and increase the risk of extirpation of the POW subpopulation of QCG, which ultimately increases the risk of extinction of the already threatened DPS (USFWS 2007). An ideal northern goshawk home range consists entirely of older forests with small, dispersed openings (Reynolds et al. 2008). Guidelines for the composition of PFAs stipulate that “the majority (60%)” of a PFA should be in forest of older age classes (Reynolds et al. 1992:23). Nest areas in Southeast Alaska averaged 71% productive old growth; 58% of the nest area was comprised of preferred habitat (Smith 2013). Before logging, landscapes likely were similar in composition to nest areas, although a disproportionate amount of high (POG) and very high volume old-growth (HPOG) was clearcut during the three decades preceding the 1997 TLMP revision, especially on Prince of Wales and other southern islands (USDA Forest Service 1997). At the time of the summary assessment of the conservation strategy (USDA Forest Service 1997), about 5% (35/678) of the watersheds exceeded a stipulated threshold, with 33 – 47% of productive old-growth forests already harvested; 26 of those (74%) are concentrated in one Biogeographic Province (North Prince of Wales Island). Moreover, full implementation of the Forest Plan would result in 51 watersheds with >47% of the productive old-growth harvested, 29 of which would occur in the North Prince of Wales Island Province. The summary assessment acknowledged the higher risks of	

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	exceeding watershed thresholds, especially across North Prince of Wales Island, but assumed that large reserves in those landscapes would mitigate the habitat loss from excessive timber harvest. The findings of this study suggest that contributions of habitat reserves and other conservation elements do not compensate for cumulative habitat loss in intensively managed landscapes (Smith and Flaherty 2023). Similar conclusions were obtained for managed landscapes across another large island comprised of coastal temperate rainforest (Northern Goshawk *Accipiter gentilis laingi* Recovery Team 2008). Extensive loss of habitat from clearcut logging on Vancouver Island, British Columbia evidently contributed to population declines; perceived threats to habitat and concerns over population viability led to listing of the Queen Charlotte goshawk DSP as Threatened under ESA (Federal Register 2012) and by the Committee on the Status of Endangered Wildlife in Canada (Northern Goshawk *Accipiter gentilis laingi* Recovery Team 2008). The threshold composition of suitable habitat to ensure successful breeding on POW Island is unknown. To gain this knowledge requires extensive research that chronicles reproductive histories of individual breeding pairs and links fitness to nesting habitat condition (Salafsky et al. 2007). The opportunity to compile demographic data for Southeast Alaska is remote because nest monitoring has been discontinued (Smit and Flaherty 2023). Alternatively, biologists, policy makers, land managers, and researchers often rely on habitat selection as the basis for assigning habitat quality; that is, conditions that facilitate successful reproduction (e.g., Reynolds et al. 1992, Iverson et al. 1996). Based on a similar rationale, the findings of Smith (2013) do not support the assumption that northern goshawk breeding season habitat objectives are being met in managed landscapes of Southeast Alaska (Smith and Flaherty 2023). Two lines of reasoning support this conclusion. First, spatially explicit analyses of contributions to northern goshawk breeding season habitat revealed that TLMP conservation measures contribute about half the secure habitat recommended for PFAs of breeding pairs in the southern portion of this species range (Reynolds et al. 1992) and was less than half the relative amount of preferred habitat documented in nest areas in Southeast Alaska. A similar conclusion was obtained for the broader landscape (21 km^2) surrounding each nest. This is because much of the preferred habitat across the landscape has been clearcut logged and half the remaining preferred habitat is in Development LUDs available for timber harvest. The potential for second-growth stands to become useable habitat (mature second growth) over the TLMP planning horizon is limited because unmanaged second growth typically requires ≥300 years following disturbance to develop old-forest features (Nowacki and Kramer 1998). Furthermore, full implementation of TLMP would exceed stipulated harvest thresholds of	

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	33% by ≥33% (>47%) within 29 watersheds in the North Prince of Wales Island Province, thereby increasing viability risk across a significant portion of the goshawk range in Southeast Alaska (USDA Forest Service 1997: Appendix N40; U.S. Fish and Wildlife Service 2007). Regardless, the average composition of all preferred habitat in PFAs (39%) is well below the recommended or desired condition, even if another acre had not been harvested (Smith 2013). 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.	
	FYSTS and FLUP Information Presentation	
Mark Minnillo, ADFG (Alaska Department of Fish and Game)	Information requirements: The FLUPs should clearly identify what timber harvest and road construction activities would occur within 300' of anadromous and high-value resident fish water bodies, and how allowances will be made for important fish and wildlife habitat within this zone. We appreciate notification of multiple sales that may be close enough to function as units of one sale. However, we would appreciate the opportunity to review the location of sales that are less than 10 acres in size, to identify any wildlife concerns such as dens or nesting areas. Mapping Requirements: OHMP appreciates the increase in quality and clarity of the maps included with the FYSTS. Although the only streams depicted on the FYSTS maps are cataloged anadromous streams and "streams", we understand that during the FLUP process the "streams" category will be delineated into water quality, resident fish, and high-value resident fish categories. Anadromous streams depicted on all maps appear to represent the most up to date in the Anadromous Waters Catalog. Small/Medium Sized Sales Typical areas of concern to OHMP include harvest activities located near anadromous or high-value resident fish water bodies, estuarine areas, and saltchucks; road building activities impacting anadromous or resident fish water bodies; harvest on slopes greater than 67 percent; high-value deer winter range; wildlife travel corridors; and important wildlife habitats such as denning or nesting areas. As stated above, we would appreciate the opportunity to review the location of sales less than 10 acres in size, to identify any wildlife concerns.	