

STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF FORESTRY AND FIRE PROTECTION



SOUTHEAST AREA

BEST INTEREST FINDING FOR
NORTHWEST COFFMAN TIMBER SALE
SSE-1395-K

May 2026

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
DFFP	Division of Forestry and Fire Protection
FLUP	Forest Land Use Plan
FRPA	Alaska Forest Resources and Practices Act
FYSTS	Five-year Schedule of Timber Sales
MBF	Thousand board feet
POG	Productive old growth
POW	Prince of Wales (Island)
POWIAP	Prince of Wales Island Area Plan
ROW	Right-of-way
SESF	Southeast State Forest
SESFMP	Southeast State Forest Management Plan
SHPO	State Historic Preservation Office
UA	University of Alaska
USFS	United States Forest Service

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I. PROPOSED ACTION

The Division of Forestry and Fire Protection (DFFP) is proposing to offer for sale approximately 365 acres of primarily old growth timber composed of western redcedar, western hemlock, Sitka spruce and Alaska yellow cedar on state lands located between Grassy Lake and Coffman Cove on Prince of Wales Island (see Appendix A, Northwest Coffman Timber Sale Maps). The volume to be offered has been estimated to total approximately 7,600 thousand board feet (MBF).

The DFFP proposes to sell the commercial timber in one or more negotiated sales under provisions of AS 38.05.118. Negotiated timber sale methods have been chosen because of the State's interest in encouraging employment on POW by processing as much of the timber locally as feasible.

The DFFP has received interest for timber from mills on Prince of Wales Island, consequently the DFFP will use its typical request for proposal process (RFP) to determine the specific purchaser(s) with whom to negotiate. The RFP process will consider the track record of the purchaser to locally manufacture wood products (AS 38.05.118), the proposed quantity of value-added wood products to be produced, the projected payroll associated with processing the sale, and the proposed stumpage rates. Selling the timber in an open and competitive manner using the AS 38.05.120 authority in Southeast Alaska would likely generate higher stumpage revenue to the State. Purchasers of competitive sales typically use the round log export market and can obtain higher returns on their investment. A competitive sale using the AS 38.05.120 authority could not be constrained through contract language to use local mills as much as feasible.

The management objectives for the proposed timber sale are:

1. To follow the Alaska Department of Natural Resources' (ADNR) constitutional mandate to encourage the development of the State's renewable resources, making them available for maximum use consistent with the public interest.
2. To support the State's economy by providing royalties to the State in the form of stumpage receipts, and infuse the State's economy through wages, purchases, jobs, and business.
3. To contribute to the local economy of the communities within southern Southeast Alaska through jobs associated with road building, logging, trucking and potentially milling.
4. To harvest timber from future subdivision areas to promote economic development and to minimize infrastructure development costs in the area.

II. STATUTORY AND REGULATORY AUTHORITY

The Division is taking this action under the authority of

- AS 38.05.035(e) Best Interest Finding;
- AS 38.05.110-120 and 11 AAC 71, Timber Sale Statutes and Regulations; and
- AS 41.17.010-950 and 11 AAC 95, Forest Resources and Practices Statutes and Regulations.

III. ADMINISTRATIVE RECORD

The Division will maintain an administrative record regarding the decision of whether to proceed with the action as proposed. This record will be maintained at the DFFP's Southeast Area Office filed as SSE-1395-K.

IV. SCOPE OF DECISION

This Preliminary Best Interest Finding (BIF) is part three of a six-part process to design, sell, and administer timber sales. This preliminary BIF covers the sale of approximately 365 acres of old growth forest. The proposed harvest is composed of western red cedar, western hemlock, Sitka spruce and Alaska yellow cedar on state land within the project area (see Appendix A, Northwest Coffman Timber Sale Maps). The following list summarizes the overall land and forest planning process:

Part 1: Regional Planning. The Alaska Department of Natural Resources (DNR) develops area plans and state forest management plans to designate appropriate uses for state land, classify the land accordingly, and establish management guidelines for multiple use. These plans determine where timber sales are an allowed use, and what other uses must be considered when designing and implementing timber sales. Subsequent land use decisions must be consistent with provisions contained within the applicable area and/or forest plans. The project area analyzed in this BIF is covered by the Prince of Wales Island Area Plan (POWIAP) specifically, the Coffman Cove Subunit 6A and the Coffman Cove unit in the Southeast State Forest Management Plan (SESFMP). The classification of most of the area outside of the Southeast State Forest (SESF) is General Use and Settlement under the POWIAP.

Part 2: Five-year Schedule of Timber Sales (AS 38.05.113). The Southern Southeast Area Office prepares a Five-Year Schedule of Timber Sales (FYSTS) every other year. The Schedule identifies proposed sales, including their general location, approximate acreage and/or estimated timber volume, and main access routes. The FYSTS is a scoping document that provides, for each proposed timber sale, an opportunity for the public, agencies, and industry to identify potential issues and areas of interest for further consideration in the BIF process. Under AS 38.05.113, proposed timber sales within the area covered by a BIF must appear in at least one of the two FYSTSs preceding the sale. This timber sale area has been identified in the 2026-2030 FYSTS.

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

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

Part 4: Forest Land Use Plans (AS 38.05.112). Prior to authorizing harvest of timber on any area greater than 10 acres, the DFFP must adopt a site-specific Forest Land Use Plan (FLUP) for the harvest area. The FLUP specifies the site, size, timing, and harvest methods for harvest units within the sale area. The FLUP also addresses site-specific requirements for access construction and maintenance, reforestation, and multiple use management. The FLUP is based on fieldwork and site-specific analyses by the DFFP in consultation with appropriate regulatory agencies. The FLUP is subject to public review.

Part 5: Timber Sales and Contracts. Following final adoption of the BIF, the DFFP may offer the timber for sale (negotiated or competitive bid) using the appropriate authority. The Division will sign a contract with the

purchaser for each sale. The contract will include stipulations requiring compliance with the BIF, FLUP, and all applicable statutes and regulations.

Part 6: Sale Administration. DFFP will administer the timber sale and conduct field inspections to ensure compliance with the BIF, FLUP, timber sale contract, and applicable laws, including the Alaska Forest Resources and Practices Act (FRPA) and regulations (AS 41.17 and 11 AAC 95), and forest management statutes and regulations in AS 38.05 and 11 AAC 71.

V. PROJECT LOCATION, LAND STATUS, AND DESCRIPTION

A. Location

The timber sale area is found within Sections 33 and 34, Township 67 South, Range 81 East and Sections 2, 3, and 4 Township 68 South, Range 81 East, Copper River Meridian. The sale area is found within the Craig B-3 USGS quadrangle. See Appendix A, Northwest Coffman Timber Sale Vicinity Map.

B. Title status

Patented under National Forest Community Grants 230, 345 and 386.

C. Land use planning, classification, and management intent

The project area analyzed in this BIF is covered by the POWIAP specifically, the Coffman Cove Subunit 6A and the Coffman Cove unit in the Southeast State Forest Management Plan. The classification of most of the area outside of the State Forest is General Use and Settlement under the POWIAP. On General Use and Settlement classification, the DMLW is the land manager and the DFFP is the forest resource manager. On SESF land the DFFP is both the land manager and resource manager.

The land management intent for the project area other than those areas of the SESF is described within the POWIAP (adopted 1985, updated 1998). The resource decisions in the area are guided by Chapter 2 with specific land management planning notes for the areas as follows (excerpted as applicable from the POWIAP Chapter 3):

COFFMAN COVE SUBUNIT 6A MANAGEMENT INTENT AND GUIDELINES

“State lands in this subunit will be managed for multiple use, with an emphasis on meeting the needs of the developing community of Coffman Cove for community expansion and to support the economic base of this community through use of the commercial forest resources.”

FISH AND WILDLIFE

“The uplands adjacent to the main roads are used for deer hunting, but are not designated because they do not meet the criteria for intensive community harvest. Impacts on non-designated community harvest areas should be considered when authorizing activities.”

FORESTRY

“State uplands designated “Gu” (General Use) are considered appropriate for timber harvest, subject to design buffer separations between areas of timber harvest and areas designated for residential development, the requirements of Chapter 2, and view shed considerations. Uplands designated “S” (Settlement) may also be appropriate for timber harvest subject to the requirements of this plan (Chapter 2) and must be coordinated with adjacent land use development.”

Section 3 and 4 are within the legislatively designated SESF. The primary purpose for the legislatively designated Southeast State Forest is timber management (AS 41.17.200); provisions of area plans do not apply within legislatively designated areas such as state forests. The SESFMP was adopted on February 29, 2016.

“AS 41.17.200. State forest purposes and management. (a) The purpose of AS 41.17.200 - 41.17.230 is to permit the establishment of designated state-owned or acquired land and water areas as state forests. The primary purpose in the establishment of state forests is timber management that provides for the production, utilization, and replenishment of timber resources while allowing other beneficial uses of public land and resources.

(b) In managing a state forest, the commissioner shall, consistent with the primary purpose of a state forest under (a) of this section, restrict the public use of the land and its resources, including timber, fish and wildlife, and minerals, only when necessary to carry out the purposes of this chapter.”

D. Current access and land use

The sale area is located west of the community of Coffman Cove on Prince of Wales Island. The access to the area is via the POW road system, specifically the USFS Road 3030500 off the Coffman Cove Highway.

The adjacent proximate large landowner is the USFS. Portions of the sale area were harvested in the 1950's during the beginning of the long-term pulp contract, and other USFS timber units were harvested after that period, but prior to conveyance to the State. More recent timber management in the general vicinity has been associated with the USFS, the University of Alaska, and the State DFFP in 2016-18 immediately west of the proposed sale area. The spur road that approaches the area from the 3030500 was built in 2018. The road was closed to vehicle traffic for long term storage under the FRPA best management practices, but it is proposed to be reopened and used to access this sale.

In 2025, the DFFP completed a precommercial thinning project containing 211 acres of young growth forest located in Section 4 west of the proposed timber sale; the young growth timber stand originated from harvest conducted during the 1990's.

Several state subdivisions are located to the north and east of the project area. The state initiated subdividing the Coffman Cove area in the 1980's. The most recent subdivision created by the State adjacent to the project area was finalized in 2018, one mile south of the “T” intersection of the Coffman Road; individual lots have been sold in land auctions in these subdivisions by the DMLW. Large portions of state land remain in the area that are classified for this development purpose but have not been disposed of as of this time.

The large tidal flats and estuarian area at the head of Coffman Cove have seasonal activity associated with the wildlife and fish populations; the east side is relatively accessible to the public from the adjacent Coffman Road for subsistence and recreational use associated with this setting. These tidal and upland wetlands constrain and enable the modes of access and use of the area overall. The upland area of the timber sale likely experiences incidental use by the public related to this semi-remote recreation including, but not limited to bird watching, fishing, trapping, hunting, berry picking and hiking.

E. Background and description of proposal

1. Background:

The demand for State timber has been significant for several years due to the uncertainty and timeliness of the federal timber supply. A diversified economy with a timber industry component has long been a

significant feature of the economy of southeast Alaska. The large amount of capital requirements and the associated timber jobs provide depth to the social and economic structure of the rural and urban areas. By direction from the Governor and Legislature, the Division of Forestry & Fire Protection manages a timber sale program that makes timber volume available from all eligible land classifications to help sustain the region's timber industry and economy. In conjunction with this timber supply intent, the DMLW Land Sales Section has also made the DFFP aware of areas that have a potential of being subdivided and disposed of in less than 10 years and may benefit from some timber harvest.

The Coffman area is proximate to the existing road system and offers forest resource values close to the remaining mills and processing facilities on POW. The DFFP, in collaboration with industry and the DMLW, identified the Coffman area as having potential for timber harvest to support the long-term development of the area for both the SESF and the adjacent settlement classified land. This coordinated planning on land not in the SESF is in keeping with the POWIAP intent language for settlement classified land. Existing road access is beneficial to both the economics and practicality of a settlement project and to the long-term use of the SESF. The timber sale is projected to develop initial road access generally needed for the future development of more permanent roads and to support land survey work associated with subdivision development. Roads also provide physical access for lot development and facilitate appropriate road construction as settlement occurs that is not solely dependent on high initial private or government startup capital. Additionally, while forest values are recognized as desirable to the Alaskan experience, the removal of large trees proximate to building sites, utilities and roads generally make development safer, particularly in Southeast Alaska.

Where commercial timber exists proximate to an identified settlement tract, it was generally considered appropriate to include it in the sale area, but only in those areas where timber harvest was not expected to significantly detract from other resources but would contribute to the overall economics of the timber sale, including road development.

The DFFP performed field reconnaissance in the Summer and Fall of 2025, of the proposed Northwest Coffman timber sale area. The overall objective was to confirm and examine and evaluate commercial timber types, potential road access, logging feasibility, geology, soils, hydrology, cultural resource potential, fish and wildlife habitat and other constraints within the proposed sale area. The timber harvest unit footprints represented in this BIF correspond to potentially operable merchantable timber harvest settings.

2. Timber Volume and Sustained Yield:

The total estimated saw log volume identified in this sale is approximately 7,600 MBF.

The DFFP is required to manage its timber harvest on State Forest and General Use classified land on a sustained yield basis. "Sustained Yield" means the "achievement and maintenance in perpetuity of an annual or regular periodic output of the various renewable resources of the State land consistent with multiple use" (AS 38.04.910). the sustained yield for state land in the southeast area is 9.1 MMBF or approximately 332 Acres. Approximately 3.76 MMBF or 172 acres in this proposed sale is associated with SESF or GU classified land. This amount is well within the annual allowable cut of the state land base managed for sustained yield

Timber harvest areas located on Settlement-classified land such as a portion of this project area are not managed on a sustained yield basis because the State's primary focus for those lands is eventual

disposal and divestiture from State ownership. The timber harvested from the settlement area does not count towards the annual allowable cut.

3. Harvest Unit Design:

State land classification, management intent, and the characteristics of individual timber stands influence the initial designation of harvest units and their proposed configurations. Portions of the project area located within several hundred feet of the beach contain young growth timber stands which originated from harvest during the early part of the last century. Portions of these young growth timber stands may contain merchantable size trees but these stands were mostly excluded from this proposed timber sale to protect other resource values, and due to the limited number of purchasers interested in domestic processing significant volumes of young growth timber. Information concerning various non-timber resources were identified during early project planning and further resource information has been gathered in the process of site-specific field work and agency dialog which influenced the locations and configurations of the specific harvest units proposed.

The DFFP recognized the need to definitively describe the uncatalogued fish habitat prior to moving a sale proposal forward because of the proximity and extent of the adjacent cataloged fish habitat. The streams illustrated on the maps included in this proposed timber sale constitute the surface waters observed by the state agencies and its consultants. Per the FRPA, the proposed timber sale has been designed to avoid negative impacts to surface waters and specifically anadromous habitat identified by the DFFP and the ADF&G. The anadromous waters catalog and extensive field work was used to document evidence of fish for each stream in the sale area. The evidence of fish, continuity, and the terrain (soil and water channel types) have shaped the proposed harvest unit configurations. Minimum regulatory areas requiring retention of timber along streams were then flagged on the landscape to aid in defining the feasibly operable timber. In several locations due to the extent and orientation of the tributaries containing evidence of fish, additional timber outside the regulatory minimums has been identified in this proposed plan to be retained. This additional retention is related to the agency's perspective regarding the timber's relative resilience (wind firmness) and usefulness of the specific site for the statutory requirements. The resulting proposed unit configuration conforms to the FRPA riparian intent in AS 41.17118(a). It considers the site-specific requirements of timber retention to maintain the riparian characteristics for fish habitat and the associated important wildlife habitat intent. This is in keeping with the riparian retention function for fisheries and the wildlife cover and connection of the important habitats as recommended by ADF&G. This proposed riparian timber retention intent regarding fisheries and in some cases wildlife is specifically applicable at:

- The anadromous stream complex between and around Units 1 and 2.
- The anadromous stream complex east of Unit 3.
- The estuarian and anadromous stream complexes west of Units 3 and 4.

Documented cultural/ historical sites adjacent to the shoreline and in proximity to existing private land influenced areas of the proposed timber sale design. Existing subdivisions were also provided 100 feet of separation (timber retention buffer) from any proposed timber harvest activity.

Reconnaissance of the timber by the DFFP indicates that all the proposed sale area is harvestable using shovel logging techniques. The shovel logging system will take advantage of directional timber falling techniques and utilization of benches and terrain features to access all timber identified. Logging

performance requirements of the timber sale contract require adequate punchon in skid trails to minimize impacts to the soil and to water quality.

4. Unit Access:

As planned, the timber sale will be accessible from the POW highway system and tie to the USFS 3030500 road located on State land in Section 4. The proposed roads will be built to the state forest road construction standards for secondary and spur classifications unless otherwise authorized by the DFFP. The DFFP and the purchaser will coordinate with the USFS regarding the authorization and use of the existing 3030500 road.

The timber sale area is undeveloped and is isolated by a wetland area that runs north to south on its west side. Other than the associated construction required to cross the wetlands, the road complexity required for the timber sale is customary. The amount of road is likewise considered normal within contemporary requirements for a timber sale of this size. The DFFP evaluated two wetland area crossing options, one of which will be necessary to connect from existing roads to the proposed in-unit road system:

Crossing A is the northernmost crossing, whereas Crossing B is the southernmost crossing.

Crossing A

The northern crossing (Crossing A) is approximately 500 feet upstream of the mapped extent of Cataloged Stream No. 106-30-10250. The DFFP considers the site to be uncatalogued anadromous habitat based on waterbody characteristics and evidence of fish at the site. An ADF&G fish habitat permit and other regulatory concurrence for a proposed fill of the tide lands under the Section 404 Clean Water Act would likely be necessary. The site evaluated is characterized by a deep organic banked channel. The location in general has poor road foundation and bridge approach characteristics due to the deep organic soils observed. A more open grassy estuarian area opens to the north. The site is influenced and flooded by tides above mean high water. The approach to Crossing A could be accessed by constructing a road from the end of 3030505 spur built in 2017. Due to the geometry of the approach, the width of the tidally flooded area and related flows, a bridge was also investigated but initial scoping indicated that it was not a cost-effective approach for the site given the unknown future use and needs of the area. The organics observed at the location led to the consultant proposing an eight-foot-deep rock mat foundation approximately 200 feet long with the placement of several 60-inch culverts in the fill. The related approach and tie to the common road system of both alternatives is approximately 0.25 miles.

Crossing B

The southern crossing (Crossing B) is over the same main tributary of Cataloged Stream No. 106-30-10250, located one half of a mile south of the southwest end of the 3030506-spur built in 2017. The crossing location identified is over a legacy beaver dam that is approximately 2-4 feet in height and approximately 180 feet long. The underlying material at the site is inferred to be a significant amount of organic soil and debris. Downstream of the site is characterized by very wet scrubby timber and often undefined wet grassy reaches with no well-defined stream channel. The crossing is near the dividing point between the watersheds of cataloged streams 106-3010250 and 106-3010160. While the site may have hydrological connectivity to downstream anadromous habitat, the DFFP did not find evidence of fish at the site and does not consider it to contribute anadromous habitat values. Regardless, the ADF&G administrative review requested that the crossing be authorized with a fish passage permit and be removed at the completion of the timber harvest. The DFFP intends to involve ADF&G in the design of the structure using the permit process and will evaluate the ability to maintain the structure(s) long

term during drafting of the FLUP. The proposed construction for Crossing B is proposed as a five-foot-deep shot rock mat foundation approximately 185 feet long with several 48-inch culverts placed in the fill. Beaver activity was observed to the south and is anticipated to be a long-term culvert maintenance issue at the site. The related approach and tie to the common road system of both alternatives is approximately 0.41 miles.

The construction costs of the above alternatives were evaluated and estimated to be equivalent. Crossing A has operational advantages due to the location relative to the center of the sale but would typically have restrictions related to the timing of construction in fish habitat, administrative, economic and construction timing risks associated with the 404-permit process and predicted higher maintenance costs. Crossing B, while it has double the approach and departure lengths, does not significantly increase the trucking time as most of the haul time and therefore cost is associated with the highway time on the island road system. Crossing B contains smaller culverts and is physically a lower fill depth than Crossing A which typically leads to a higher level of confidence on the road for drivers and vehicle safety. It is a significantly more stable hydrologic site with a lower flow and depth of channel than Crossing A. Crossing B is also significantly spatially removed from the more ecologically valued tidal estuary. Crossing B has been determined to be the proposed and preferred location due to the lower overall risk to the resources, the public and the project timeline.

Drainage structure types and sizes have been scoped and initially specified for most of the access roads proposed. Specified drainage structures will maintain the existing hydrology of the area and are indicated where known on the plan maps. Additional minor drainage structures will likely be identified and specified as information is further refined during the field-based FLUP development stage. ADF&G will be consulted for all fish crossing structure designs.

The proposed logging spurs will likely benefit future settlement development north of Unit 2 and possibly in Unit 4. Two different extensions of the 3030506 in Unit 2 were investigated and are depicted (see unit maps) to verify the feasibility of accessing the existing subdivision (AS 87-43, Blocks 1-7) to the north. The proposed construction of the spurs into Unit 10 (spur 3030506 has the potential in the future to intersect with the platted right of way(s) in Blocks 1-7 of AS 87-43. The conceptual location of a tie to the platted Sea Lion Drive on the southern end of Blocks 4 and 7, while physically not prohibitive in construction scope, does not appear to be cost effective or necessary for the proposed timber sale based on the amount of timber present. High order LiDAR and ground reconnaissance have been used to arrive at these conclusions.

A conceptual layout was also made of the timber to the northwest of Unit 13 (Units 16-20) and is shown on the map(s) for informational purposes; it is not part of the proposed sale. The area was of interest to the members of the Coffman City Council when the division attended the city council meeting in November of 2026. The timber in that area appears to currently be economically isolated. Further effort verifying timber quality and other resources could change this perspective. The apparent amount of timber has not been verified but it appears to not be economical to recover and is not part of this proposed timber sale plan.

The DFFP may consider leaving portions of the road system open following project completion. This decision is typically addressed further in the FLUP based on the level of community and other land managers' interest in the area. The ability to keep a road open to vehicle traffic is a function of the land-owner/manager or another entity willing to take long term financial responsibility for conducting ongoing maintenance of the road.

F. Resources and management

1. Timber

a. Timber Stand Composition and Structure:

The sale area contains old-growth and young growth timber. The focus of this harvest is the old growth timber. The old growth timber proposed for harvest is composed of western redcedar and western hemlock with minor components of Sitka spruce and Alaska yellow cedar; the older stands generally have visible defects for a variety of reasons (windthrow damage, old age, disease, site position, etc.), species bias against harvest of redcedar or low volume per acre as they have not previously been harvested.

The young growth timber types adjacent to the proposed harvest area vary in age and occupy several different site classes. The stands from the 1950's era and prior years are located adjacent to coastal access. A few of these stands were selectively harvested which left timber that was not desirable at the time; most of this residual old growth timber has since blown over decades ago. Occasional old growth redcedar stems remain in these areas. In general, these older areas are in the stem exclusion phase of regeneration with the more vigorous spruce and hemlock timber being of pole size (less than 9" DBH). The healthier stands generally occupy better drained sites with southern exposures. Evidence of wind disturbance was noted on the northern and southeastern aspects of these older stands where soil is thin, wet or the site exposed by terrain. Understory of most of this age class is generally relatively open.

b. Stand Silvics:

Areas that were previously harvested in the vicinity of the Northwest Coffman timber sale were observed to be naturally fully stocked, vigorous young-growth stands of hemlock, spruce, and redcedar seedling, sapling, and pole-timber. These sites appear to have supported stands of red cedar, hemlock, and spruce prior to harvest and in general have common geology and soil types with the proposed timber sale area. Similar regeneration response is expected to occur on the sites proposed for harvest using a clear-cut prescription (even-aged management).

The young growth regenerating from harvests in the 1990's and 2017 to the west of the area is well stocked in spruce and hemlock. The 1990's stands have generally been thinned in the past decade on USFS and State land and have responded as anticipated. Precommercial thinning at this site is projected to yield similar benefits and would likely be appropriate in approximately 20-30 years following harvest.

c. Reforestation and Site Preparation: The sale area is anticipated to be naturally reforested in compliance with the Forest Resources and Practices regulations (11 AAC 95.375-.390) unless it is converted to other use. The DFFP will conduct post-harvest reforestation inspections of all areas of commercial timber harvest to ensure that the stocking of natural regeneration meets or exceeds FRPA reforestation requirements.

Natural regeneration is the preferred regeneration method for this sale, and it is anticipated that adequate stocking levels will be achieved within five years after harvest based on observations of the 2017 harvest to the west. Experience with this regeneration method on POW has also shown that well-stocked stands are readily established within regulatory timeframes. Logging will break

down the slash piece size and residuals to the ground level, accelerating decomposition and opening more growing space. Disturbance associated with logging will also increase seed bed opportunity and survival by creating mineral soil access and micro relief.

Sitka spruce and red cedar are the preferred species for natural regeneration in the projected future market conditions. Spruce will likely be the dominant species due to anticipated scarification in the units during harvesting operations. Scarification disturbs the vegetative mat and in turn provides a more receptive mineral soil seed bed favorable to the establishment and growth of spruce. Western hemlock and redcedar will also be major components of the regenerated stand as well since they currently occupy the site and are prolific seed producers.

d. Topography and Soils:

The timber sale area is situated on gently rolling upland coastal terrain. The sale area has no predominant aspect and elevations range from 200 to 300 feet above sea level. Organic topsoil is a moderately to poorly drained layer cloaked under a thick layer of feather and sphagnum mosses. To the north the land plateaus into poorly drained scrubby timber with some merchantable timber present adjacent to the surface drainages and areas of more elevated topography.

Geology is observed to be a glacial till and brown mineral soil overlaying a dark slate metamorphic schist bedrock with mineral inclusions. Highway construction several miles west in this type of bedrock utilized similar material that generated acid leachates associated with the rock quarried for road ballast. The DFFP timber sale immediately west of this timber sale did not have leaching issues with the rock sites developed in 2017. The USFS and State tested the pit at Mile 1.4 of the 3030500 road prior to its use for leaching risk. The subsequent use of the pit was shaped to match the type of rock tested. The same approach is planned to be used to source material for the construction of the 3030506 spur Crossing B. Upland sections of the proposed road beyond that crossing are relatively low risk as they are removed from aquatic areas. Regardless, DFFP staff will review all pit locations and plans prior to development for indications of acidic rock generation.

Glacial and marine clay deposits are present in several of the more pronounced landform lowlands. A notable mix of swamp land and scrub timber defines the limits of the entire southwest side of the sale. Surface waters are located as expected in these depressed landforms. Upstream surface waters are generally organic in substrate, but cobble and gravel substrates are common in the lower reaches of streams near tidewater. The schist bedrock is visible in the exposed outcrops located at higher elevation areas in the terrain.

2. Wildlife habitat and harvest.

This sale has been designed using guidelines and management intent from the Prince of Wales Island Area Plan (POWIAP), the Alaska Forest Resources and Practices Act and Regulations (FRPA), and the SESFMP. The sale area was not identified as crucial habitat (Ha) or prime habitat (Hb) in the POWIAP.

POW has a total area of approximately 2,577 square miles. The amount of land planned to be harvested by the Coffman Cove timber sale is small in comparison to the size of POW (0.02%). Most of the land on POW is owned by the USFS with minor amounts in other private and public ownership.

The USFS has reserved productive old growth timber (POG) for non-timber values (such as wildlife) in the 2016 Tongass Land Management Plan. In all plan alternatives, less than one percent of POG is projected to change in the next 100 years.

The ADF&G did not indicate there are site specific habitat issues in the area with respect to wildlife in the 2026-2030 FYSTS. While the surrounding area of Coffman has had significant timber harvested since the 1950's, the proposed timber sale area still offers large coastal landscape with significant historic habitat capabilities. Historic harvest areas will likely improve in habitat potential over time given the age of the stands and the mix of precommercial thinning that has occurred in many of the young growth stands. Deer and other larger animal use was indicated based on wildlife trails and scat. Evidence of Blacktail deer, Alexander Archipelago wolf and black bear were observed in the area by DFFP personnel during field reconnaissance. The ADF&G, during their comments of this proposed sale review, made the DFFP aware of how deer use available habitat based on studies conducted between 1984 and 2023 on the Tongass and specific black bear use patterns studied between 2009-2013 in the timber sale area. These studies indicated specific topography that was considered important for wildlife.

The area is surrounded by a significant amount of scrub timber, wetland and young growth timber that is not planned to be harvested. The adjacent long-term land uses in the area and the diversity of habitat will be considered in the final unit configurations. The planned riparian retention is projected to provide significant wildlife cover and connection between the various habitats present.

The proposed timber harvest will change the local deer habitat within the sale area which may affect contemporary deer numbers and accessibility. ADF&G commented on the PBIF to that effect and highlighted the convenience of the area to the community of Coffman Cove. Focus of the comment was on the longer-term productivity of the habitat conditions and how manipulation of the young growth could provide opportunity for the deer to better thrive and adapt to the habitat change, improving the ability of humans to use the area for subsistence deer harvest. Given the size of the surrounding landscape, the timber sale is not expected to significantly diminish the deer population on the island or important deer habitat that is accessible to human activities. It may decrease the availability of deer in the immediate area over time as the regenerating stand reaches the stem exclusion phase due to visibility, available browse and winter site cover. The intent of ADF&G and the DFFP is to mitigate these factors through precommercial thinning and related management actions. The increased access to the area may increase subsistence use because of the proximity to the Coffman Cove community and the improved vehicle access. Over time this use is expected to moderate as visibility decreases from the road due to regeneration and growth of timber. Regardless, the sale footprint is in a subunit area of the POWIAP that the DMLW has planned to have more concentrated human use associated with settlement activities that entail clearing and residential occupancy and is not specifically designated for subsistence or wildlife habitat use. The appropriateness (residential safety) of significant hunting in these types of areas typically changes over time due to human use.

Based on input from ADF&G, the DFFP retained an additional five acres of timber outside of the statutorily required minimum riparian retention limits for added wind throw resilience and to accommodate a higher bear use area to the southeast of Unit 2.

The DFFP used available federal information on cataloged bald eagle nest locations and field observations. No cataloged nests or additional nests were observed in or adjacent to the timber sale.

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

Extensive work was done in 2025 by technical consultants and the DFFP to map surface water and define evidence of fish habitat adjacent to the proposed timber sale units. Anadromous and resident fish were identified in many streams as was anticipated due to the topography and proximity to the cataloged anadromous streams. The ADF&G, Habitat Office visited the complex of streams on the northeast side of Unit 3 on October 20, 2025. The DFFP, in conjunction with the ADFG, will continue to verify the upper limits of anadromous fish habitat on all streams and retain timbered riparian buffers as appropriate to protect them during the development of the FLUP. There is a high confidence level in the mapped stream locations and their classifications as represented in this BIF. The conceptual units to the northwest of the proposed units (not part of this decision) still require more review by agencies to define the existence and extent of habitat.

The proposed sale will be designed with the intent to protect fish habitat and water quality in compliance with the Forest Resources and Practices Act and regulations (AS 41.17 and 11 AAC 95). As required by AS 41.17.098, DFFP provides due deference to ADF&G to ensure all fish and wildlife habitat issues are addressed by the proposed timber sale design. DFFP provides due deference to the Alaska Department of Environmental Conservation (ADEC) for all water quality issues. Achieving this intent is likely given the agency's prior experience with timber harvest in the general area.

4. Recreation, Tourism, and Scenic Resources.

Local use of the area appears to be dispersed and is associated with activities such as fishing, hunting and wildlife viewing. ADF&G did indicate that they were aware of community use of the Grassy Lake area for local hunting opportunities. Independent tourist activity occurs throughout POW generally associated with fishing and hunting. Commercial tourism is not prevalent in the area outside of the lodges mainly focused on saltwater fishing, self-guided freshwater fishing and hunting for deer and black bears.

The topography of the area does not provide extensive view sheds. The area will not be significantly visible from the Coffman Road or saltwater. The area may have some visibility from the logging roads south of the area and from the air. The scenic resource of the area is generally associated with the extensive forested landscape and coastal area. The proposed harvest is in keeping with the visual backdrop of an extensive and modified forest landscape throughout the POW road system and shore zone areas.

5. Cultural Resources.

The DFFP and the Land Development Section work with the State Historic Preservation Office (SHPO) to identify and avoid known cultural, historic or prehistoric sites in planning proposed access routes, harvest areas, and subdivision development. Research of the Alaska Heritage Resources Survey website revealed several known sites in and adjacent to tidal areas around Coffman Cove. No historic sites were indicated within the timber sale footprint. Historic sites have been documented during the previous subdivision preparations to the east and north of the timber sale area. The

DNR used this information and the agency's experience as it considered the appropriateness of different timber sale configurations and the possible risk to unknown cultural resources. Generally, the proposed sale avoids areas associated with historic use patterns in the region. If archaeological sites are identified, proposed activity and road locations will be appropriately adjusted to preserve the site(s) and avoid conflicts. If any historic or archaeological sites are encountered during road construction or harvest activities, the DFFP will immediately inform SHPO and take action to protect and document the findings.

G. Costs and benefits

Based on DFFP observations of the timber and historic timber markets, typical operating costs of working in the project area, timber revenue is projected to cover administration, access and operating costs for this sale area and return stumpage royalty to the State. Coffman Cove is within the working circle of most of the sawmills on POW Island. The larger mill owners currently have a very limited supply of timber under contract. Categorically, they have voiced an interest in timber from the Coffman area.

Selling the timber in an open and competitive manner using the AS 38.05.120 authority in Southeast Alaska would likely generate the highest stumpage revenue to the State. Purchasers of competitive sales typically use the round log export market exclusively and obtain higher returns on their investment. A competitive sale using the AS 38.05.120 authority could not be constrained through contract language to as much as feasible, require manufacture by local mills.

The Legislature and the Governor consider it import to the region and state to encourage domestic processing of the State's timber in existing mills. To this end the DFFP will encourage domestic processing to the extent feasible at the time of sale. The domestic processing of as much of a sale as is feasible is a primary objective of the State and typically leads to the most wage input into local communities. Timber purchasers often use a mix of market types locally and abroad to leverage their mill's economic capabilities. In Southeast Alaska, this has taken the form of exporting some types of logs in the round. Economics often influence mills to manufacture the logs that they are designed to handle at scale and able to sell profitably. Lumber value varies significantly based on several factors related to tree species, log size, amount and type of defect, overall log quality and market location. In old growth timber, typically the smaller low value logs are exported to mills out of state that are configured specifically to process the smaller wood.

The DFFP will use its request for proposal process (RFP) to determine the specific purchaser(s) with whom to negotiate. The DFFP will appraise the timber value in compliance with 11 AAC 71.092 for the markets offered. The RFP process will consider the track record of the purchaser to locally manufacture wood products (AS 38.05.118), the proposed quantity of value-added wood products to be produced, and the proposed stumpage rates. This process is initiated with a public notice that conforms to AS 38.05.945.

Some members of industry have requested the ability to help design and layout the final timber sale configuration. Advocates for this approach argue that the purchaser is better positioned to understand marketability than the DFFP and has a technically capable workforce. Given the lack of other options for timber this may also offer a timelier delivery of the resource for their need. Depending on the availability of DFFP staff and the apparent urgency of need for the timber; the DFFP may utilize purchaser layout services to aid in the development of the FLUP.

Mobilization costs for logging and road building in a timber sale can be a barrier for operators relative to how much timber they require for their operations. The relative costs of operating this sale are projected to be slightly higher than average because of the initial costs of developing access. The central location on POW Island and the higher percentage of western red cedar, a species valued by most mill operators, likely offsets the increased access cost.

The roads needed to access and harvest the timber are considered basic in logging construction complexity. Access to the sale area is relatively convenient being on the POW road system and proximate to the community of Coffman Cove. The construction of the roads into the sale is the most significant cost associated with the sale. The type of construction anticipated is typical of the region, a rock overlay on a prepared natural subgrade. Relatively little to no rock obstructs the construction yet is prevalent enough along the proposed roads to develop sources for the purpose of building the roads. Because the rock remains on state land and benefits the eventual use of the State's resources, fees for rock use would not be significant or appropriate.

The shovel logging system for the most part is the preferred contemporary method used in the area. Utilizing best management practices, this method provides significant control to an experienced logger for managing site conditions and is generally the most cost effective due to the crew size.

Parts of this proposed road system may eventually be of benefit to the State and the community of Coffman Cove as it develops. The Southeast State Forest will be in state ownership in perpetuity, and the intent is to eventually dispose of the Settlement and possibly the General Use land to the north. Another aspect to considering access to the area is the state's long-term intent (POWIAP) to aid the community in developing the area to the north adjacent to the existing subdivisions and city center.

The access developed by the timber sale is proximate to likely future road locations that could serve to access future residential development and previously platted subdivisions created by the DMLW. Logging roads in general have pioneered access to much of SE Alaska. Forest roads have provided many people initial access to land. They are scalable and regularly used in a similar format to build more refined roads. They are appropriate for the timber harvest and the unknown horizon of additional settlement. The forest roads will be constructed to the DFFP standards that account for the foreseeable uses. The DFFP works with the DMLW Land Development Section to design forest road alignments that could be upgraded feasibly to applicable American Association of State Highway and Transportation Officials Guidelines for Very Low Volume Roads. To construct a higher order road currently is not needed to remove the timber and is not a reasonable expectation relative to the other needs of the state.

The DFFP regularly receives inquiries about locations to gather personal use firewood. Provided that the DFFP or another agency or organization will maintain the road, the DFFP may consider leaving portions of the road system open beyond what it considers prudent to manage the Southeast State Forest. This decision typically is considered further in the FLUP based on the level of community interest. Some interest was voiced in dialog with the Coffman Cove City Council in November of 2025.

Timber sales have traditionally created broad economic benefits for the communities of Southeast Alaska. The business communities on POW and to a certain extent other nearby SE communities will receive direct economic benefits by providing support services for the operators such as fuel, food, housing, medical and miscellaneous supplies.

Making the timber on State land available for harvest is in keeping with the Alaska Constitution and the intent of the governor and legislature to make the resource available in a sustainable manner commensurate with demand.

VI. PUBLIC REVIEW

The PBIF was publicly noticed in compliance with AS 38.05.945. Notice was posted on the Alaska Online Public Notice System on February 20, 2026. Notices were also posted at the Ketchikan, Craig Public Libraries. Mailed notices were distributed to a mailing list maintained by the Southeast Area Office and public notices were sent to the post offices of Ketchikan, Ward Cove, Craig, Klawock, Thorne Bay, Coffman Cove, Naukati, Metlakatla, Wrangell and Petersburg. A legal notice was also provided in the Ketchikan Daily News and the Island Post papers.

VII. PUBLIC COMMENT

DFFP received agency comments from ADF&G and the SHPO on the Preliminary Best Interest Finding. No public comment was received. Based on the ADF&G comment, the DFFP refined the language in the wildlife section and adjusted the timber retained near the proposed Unit 2. Several other minor technical updates and edits were made throughout the document.

VIII. RECOMMENDATION AND DECISION

After due consideration of all pertinent information, the ADNR has reached the following decision: to offer for sale approximately 365 acres of old and young growth forest composed of western hemlock, Sitka spruce, western redcedar and Alaska yellow cedar on General Use/ Settlement and Southeast State Forest classified land on Prince of Wales Island in the vicinity of the community of Coffman Cove. Harvest activities on the Settlement lands will follow the management intent of the Prince of Wales Island Area Plan. The DFFP finds that this decision satisfies the objectives stated in this document and it is in the best interest of the State to proceed with this action under its authority in AS 38.05.035(e) (Powers and Duties of the Director) and AS 38.05.110-120; 11 AAC 71 (Timber Sale Statutes and Regulations; and AS 41.17.010-.950 and 11 AAC 95 (Forest Resources and Practices Statutes and Regulations).

IX. SIGNATURE



Commissioner *For*
Alaska Department of Natural Resources

27 May 2026
Date

X. RECONSIDERATION

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

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

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

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

If you have any questions, please contact the Southeast Area Forester at: 907.225.3070 or at: dnr.dof.sse@alaska.gov.

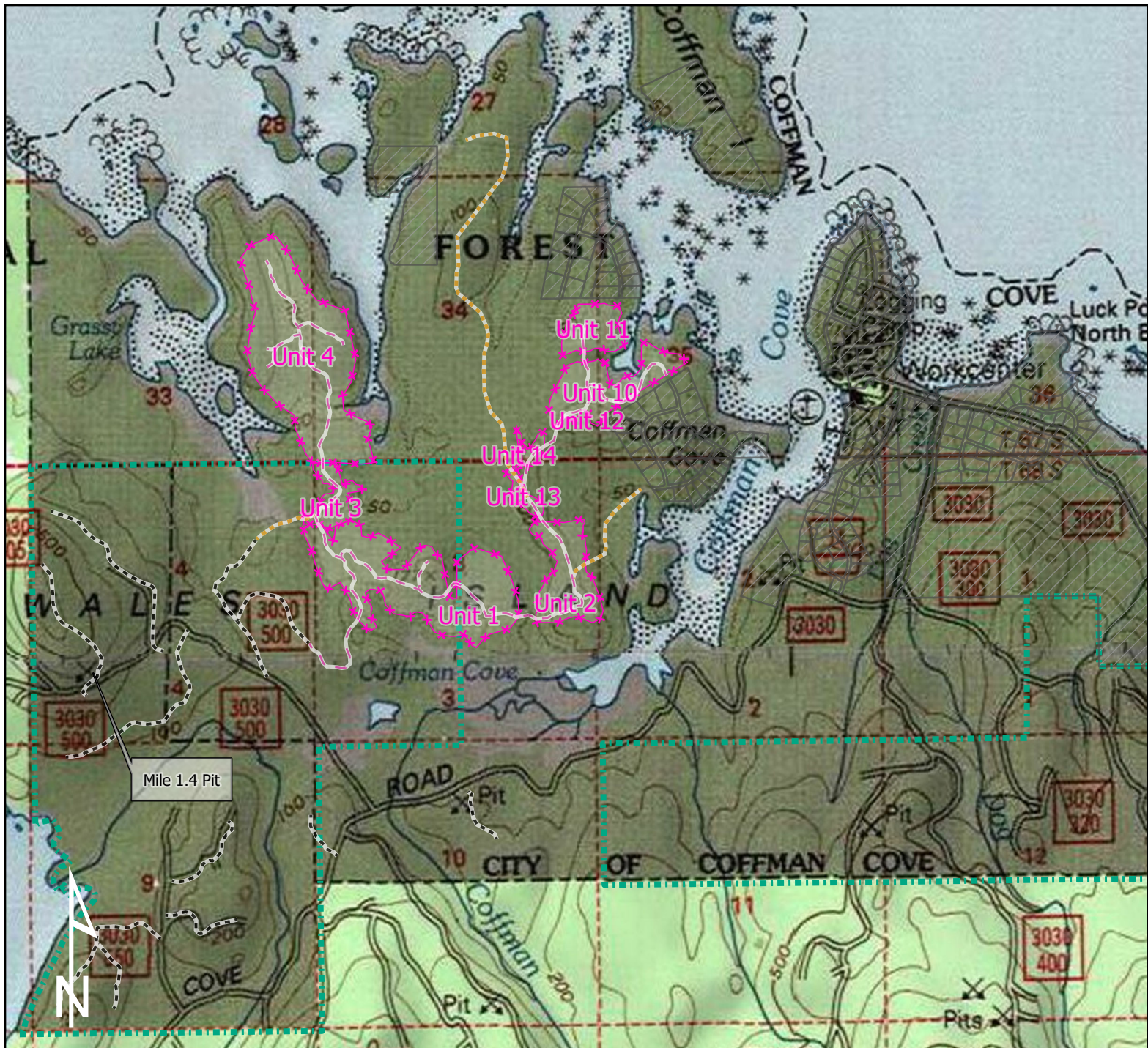
XI. APPENDICES

Appendix A	SSE-1395-K Northwest Coffman Timber Sale Maps
Appendix B	References
Appendix C	Appeal Regulations
Appendix D	Northwest Coffman Timber Sale Comments & Responses

Appendix A SSE-1395-K Northwest Coffman Timber Sale Maps

Vicinity Map (one page)

Unit Maps (eight pages)

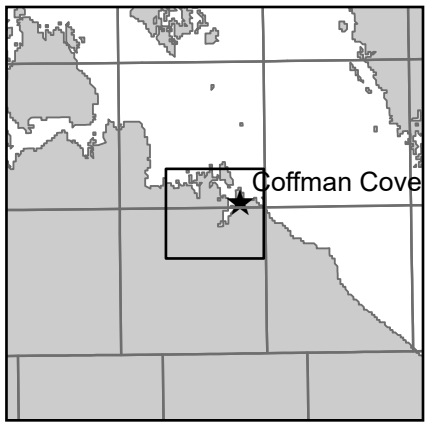


Mile 1.4 Pit

0 0.5 1 Miles
Area Map 1 in = 0.5 Miles

Contour Interval = 100 FT
Source: USGS DEM

Appendix A1 Northwest Coffman Timber Sale Area Map SSE-1395 K

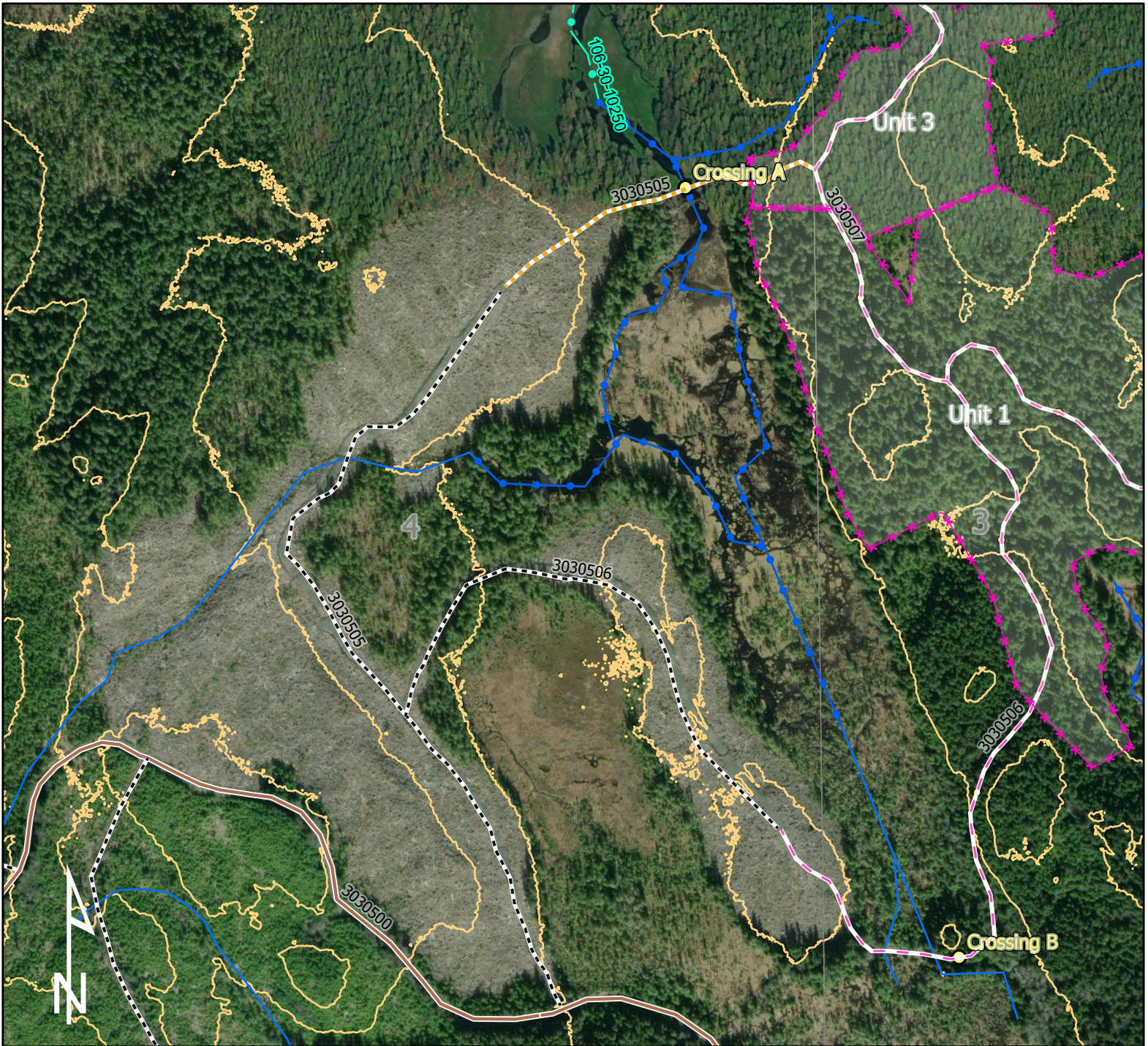


Vicinity Map 1 in = 8 miles

Legend

- Timber Sales
 - Proposed (pink dashed line with 'x' markers)
 - Subdivision (hatched pattern)
- State Forest Boundary (dashed green line)
- Forestry Roads
 - Closed (dotted black line)
 - Proposed (pink solid line)
 - Conceptual (dashed orange line)



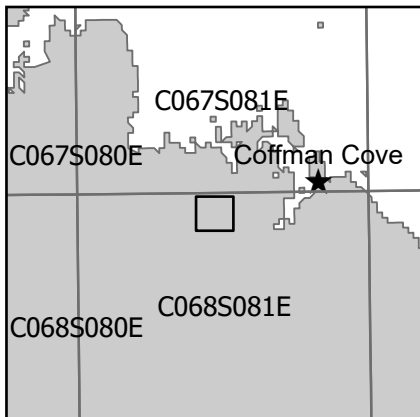


0 250 500 1,000 Feet
 Area Map 1 in = 500 Feet

Meridian, Township, Range: C068S081E
 Sections: 3, 4

Contour Interval = 40 FT
 Source: USFS LIDAR DEM

Appendix A2 Northwest Coffman Timber Sale SSE-1395 K



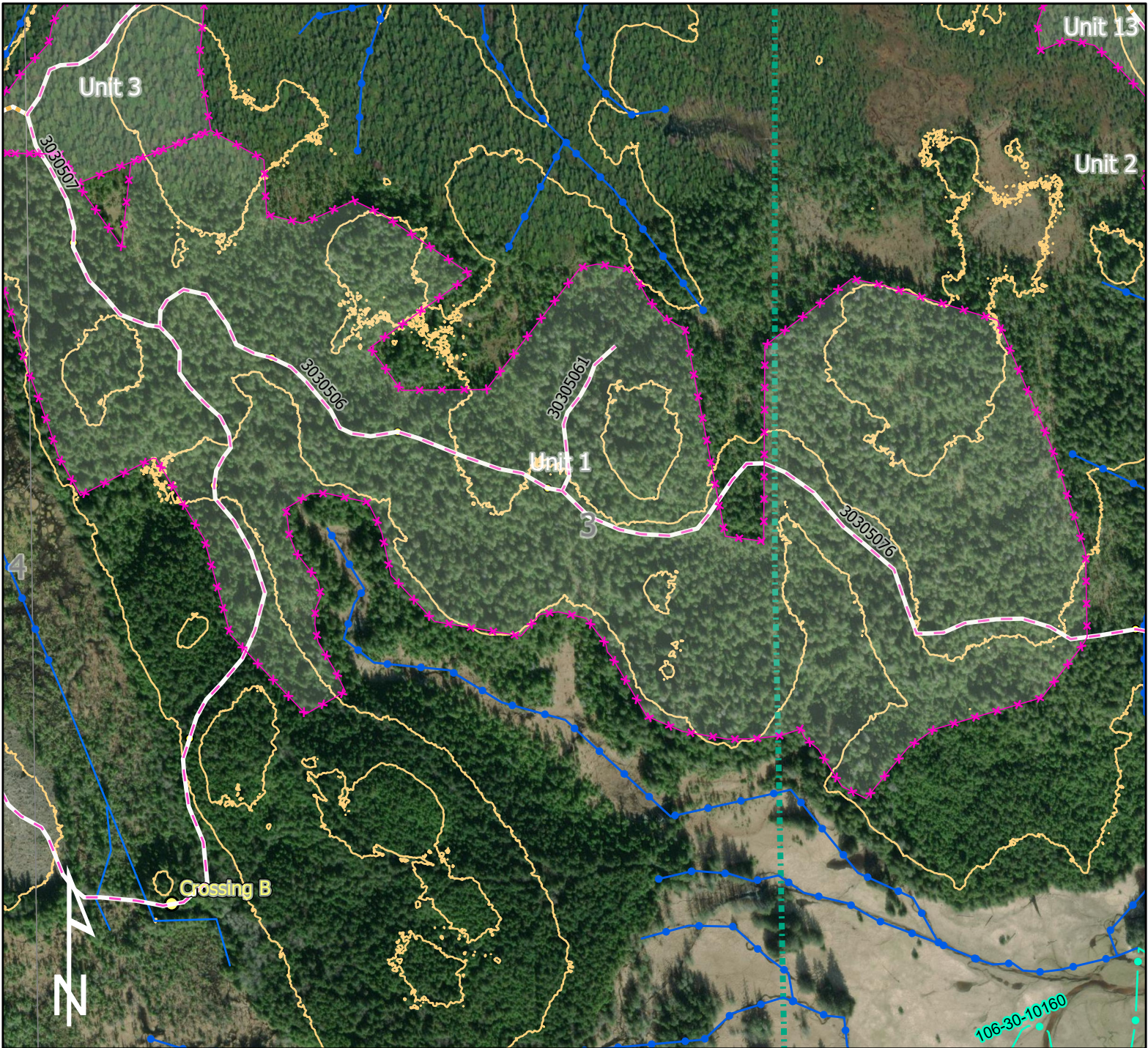
Vicinity Map 1 in = 4 miles

Legend

Timber Sales	— Proposed
✱ Proposed	— Conceptual
✱ Conceptual	
▨ State Forest	Streams
▨ Subdivision	— Cataloged Anadromous
Roads	● Non-Cataloged Anadromous
— Inactive	— Surface Water
- - - Closed	● Culverts



Map Focus: Unit Access

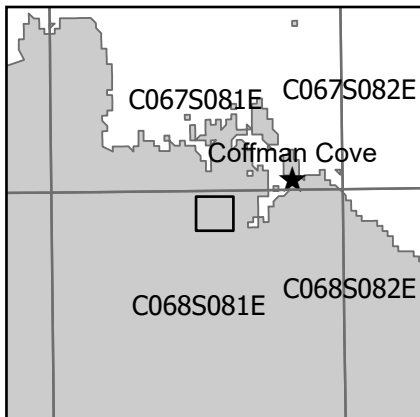


0 250 500 1,000 Feet
 Area Map 1 in = 500 Feet

Meridian, Township, Range: C068S081E
 Sections: 3, 4

Contour Interval = 40 FT
 Source: USFS LIDAR DEM

Appendix A2 Northwest Coffman Timber Sale SSE-1395 K



Vicinity Map 1 in = 4 miles

Legend

Proposed	Conceptual
Conceptual	Streams
State Forest	Cataloged Anadromous
Subdivision	Non-Cataloged Anadromous
Roads	Surface Water
Proposed	Culverts



Map Focus: Unit 1

Page 2 of 8

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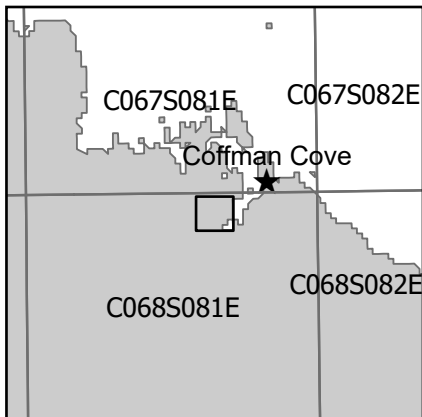


0 250 500 1,000 Feet

Area Map 1 in = 500 Feet

Meridian, Township, Range: C068S081E
Sections: 2, 3

Contour Interval = 40 FT
Source: USFS LIDAR DEM



Vicinity Map 1 in = 4 miles

Legend

Timber Sales	Conceptual
Proposed	Streams
Conceptual	Cataloged Anadromous
State Forest	Non-Cataloged Anadromous
Subdivision	Surface Water
Roads	Culverts
Proposed	

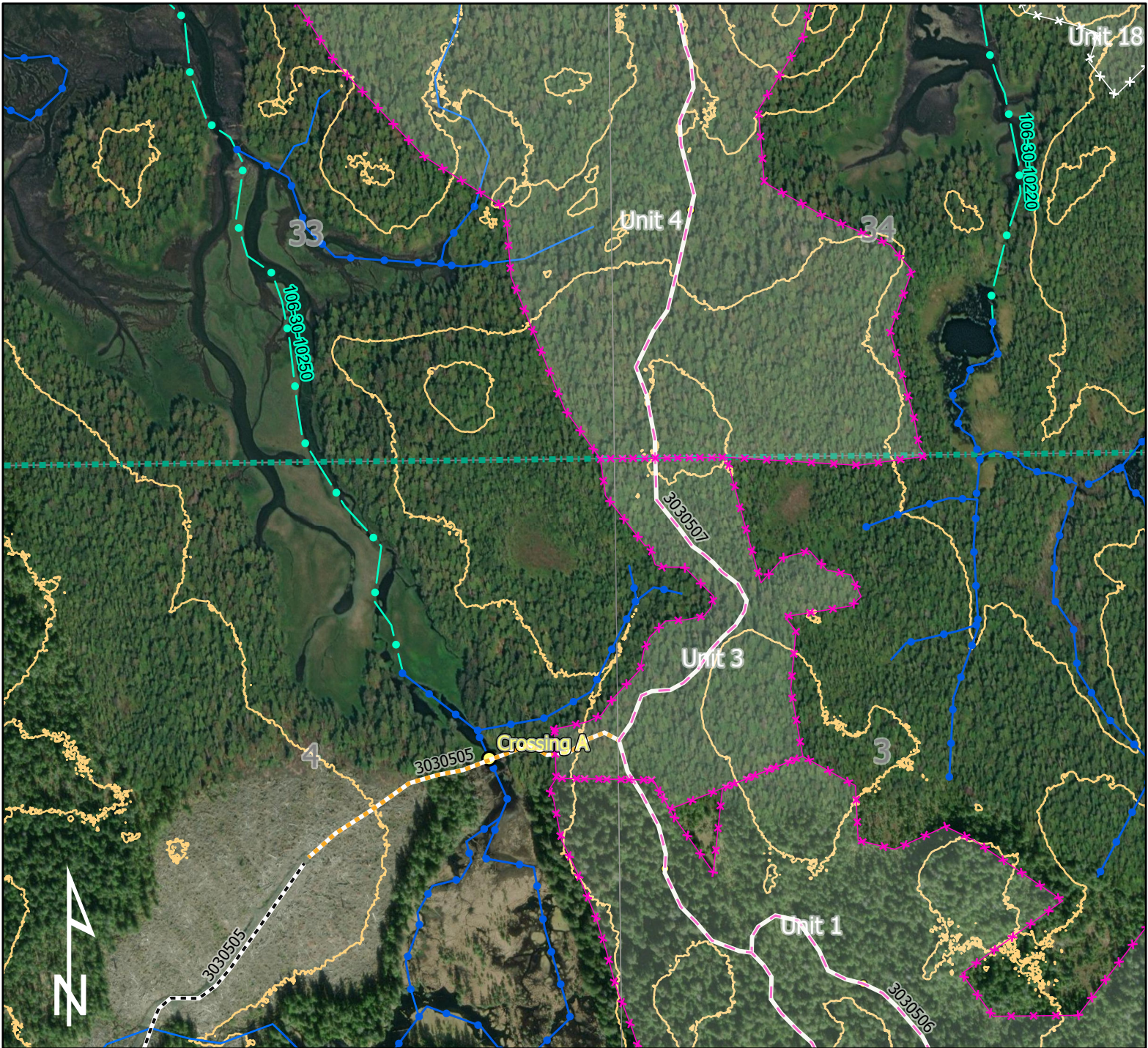
Appendix A2 Northwest Coffman Timber Sale SSE-1395 K



Map Focus: Unit 2

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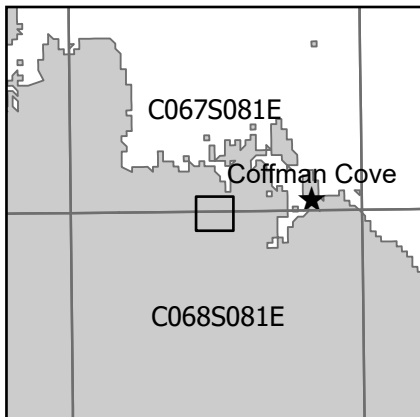


0 250 500 1,000 Feet
 Area Map 1 in = 500 Feet

Meridian, Township, Range: C067S081E
 C068S081E
 Sections: 3, 4, 33, 34

Contour Interval = 40 FT
 Source: USFS LIDAR DEM

Appendix A2 Northwest Coffman Timber Sale SSE-1395 K



Vicinity Map 1 in = 4 miles

Legend

Timber Sales	— Proposed
✱ Proposed	— Conceptual
✱ Conceptual	
▒ State Forest	
▒ Subdivision	
Roads	
--- Closed	
	Streams
	— Cataloged Anadromous
	— Non-Cataloged Anadromous
	— Surface Water
	● Culverts





0 250 500 1,000 Feet
 Area Map 1 in = 500 Feet

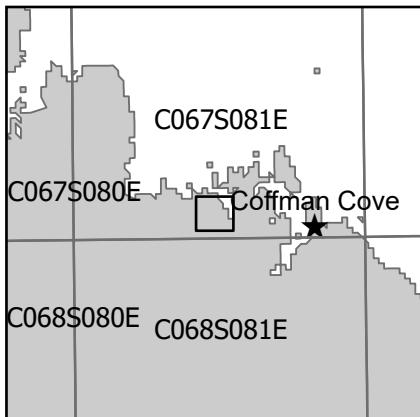
Meridian, Township, Range: C067S081E
 Sections: 33, 34

Contour Interval = 40 FT
 Source: USFS LIDAR DEM

Appendix A2 Northwest Coffman Timber Sale SSE-1395 K



Map Focus: Unit 4
 Page 5 of 8 5/21/2026 GS



Legend

Timber Sales

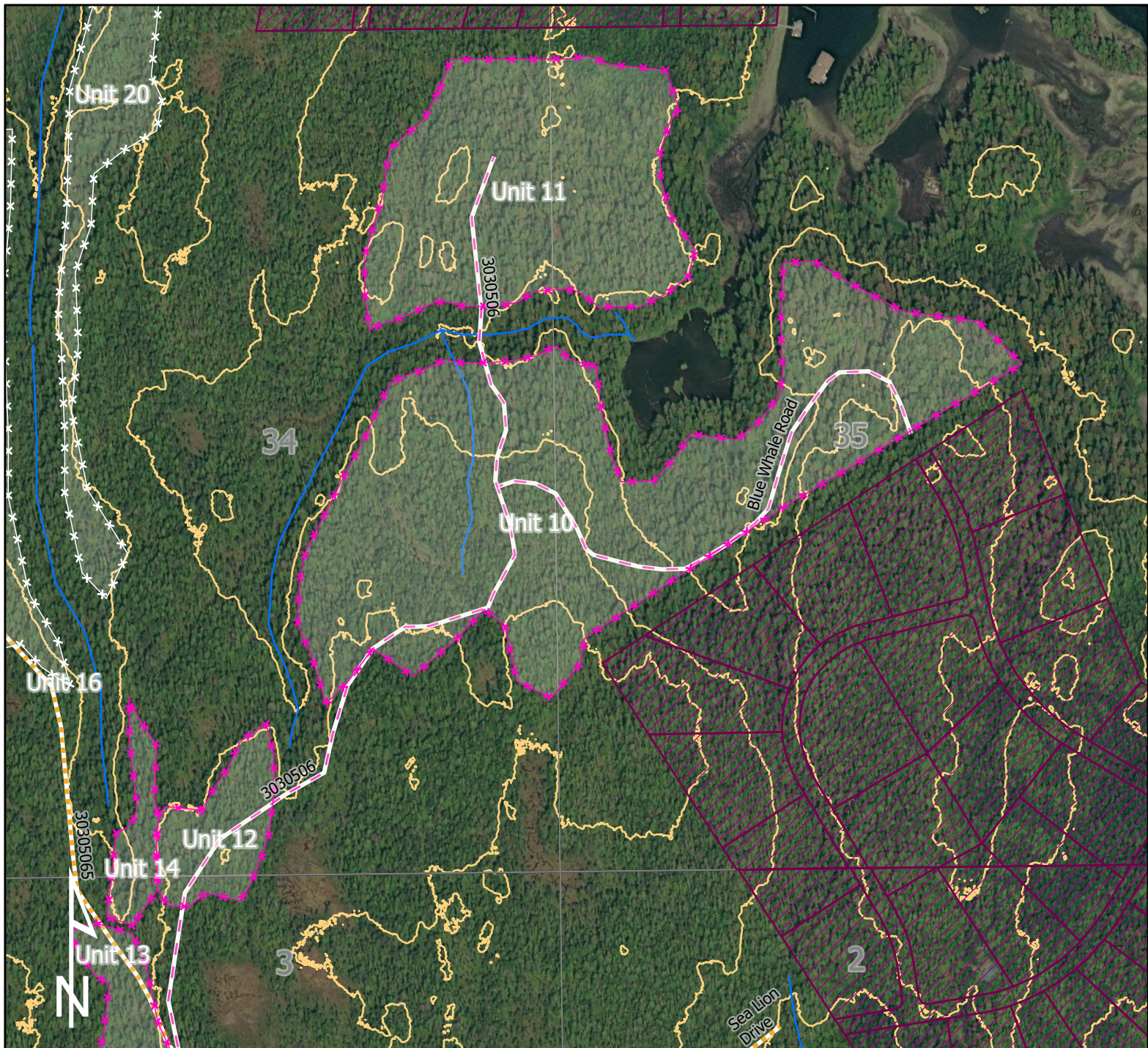
- Proposed (Pink line with 'x' markers)
- Conceptual (Grey line with 'x' markers)
- State Forest (Green dashed line)
- Subdivision (Pink hatched area)

Roads

- Proposed (Pink dashed line)

Streams

- Cataloged Anadromous (Green line with dots)

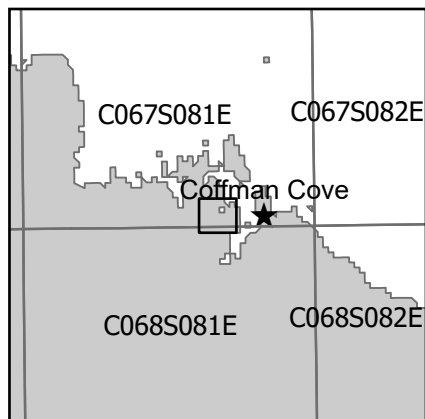


0 250 500 1,000 Feet
 Area Map 1 in = 500 Feet

Meridian, Township, Range: C067S081E
 C068S081E
 Sections: 2, 3, 34, 35

Contour Interval = 40 FT
 Source: USFS LIDAR DEM

Appendix A2 Northwest Coffman Timber Sale SSE-1395 K



Vicinity Map 1 in = 4 miles

Legend

Proposed	Conceptual
Conceptual	Streams
State Forest	Cataloged Anadromous
Subdivision	Non-Cataloged Anadromous
Roads	Surface Water
Proposed	Culverts



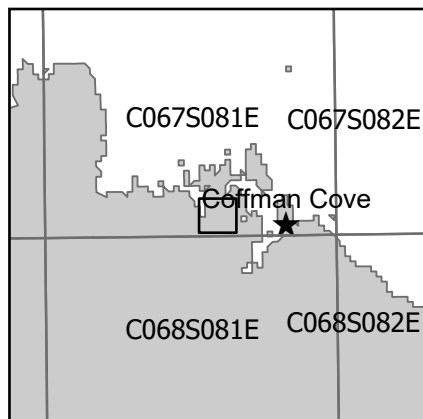


0 250 500 1,000
 Feet
 Area Map 1 in = 500 Feet

Meridian, Township, Range: C067S081E
 Sections: 34

Contour Interval = 40 FT
 Source: USFS LIDAR DEM

Appendix A2 Northwest Coffman Timber Sale SSE-1395 K

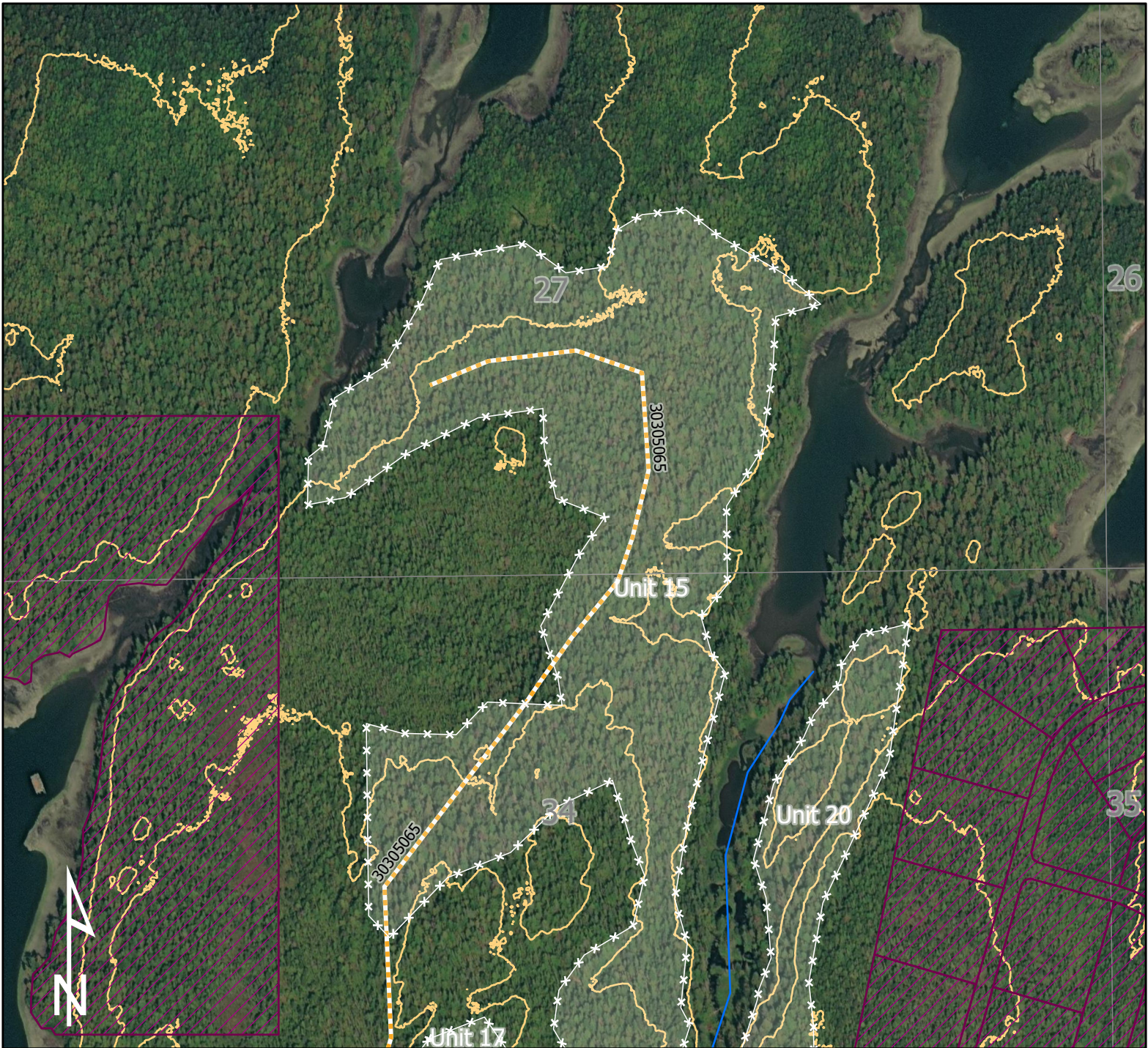


Vicinity Map 1 in = 4 miles

Legend	
	Conceptual
	Proposed
	Conceptual
	State Forest
	Subdivision
	Proposed
	Conceptual
	Cataloged Anadromous
	Non-Cataloged Anadromous
	Surface Water
	Culverts



Map Focus: Unit 15- 20



0 250 500 1,000
 Feet
 Area Map 1 in = 500 Feet

Meridian, Township, Range: C067S081E
 Sections: 26, 27, 34, 35

Contour Interval = 40 FT
 Source: USFS LIDAR DEM

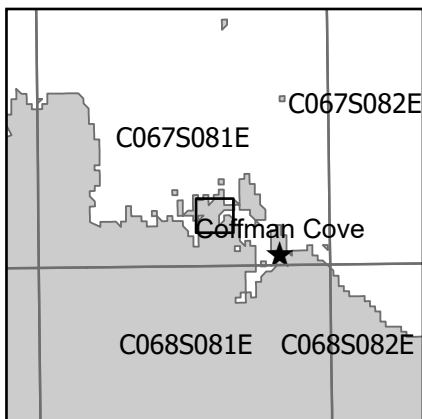
Appendix A2 Northwest Coffman Timber Sale SSE-1395 K



Map Focus: Unit 15

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5/21/2026 GS



Legend

Timber Sales

- Proposed
- Conceptual
- State Forest
- Subdivision

Roads

- Conceptual

Streams

- Cataloged Anadromous

Appendix B References

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Appendix C Appeal and Request for Reconsideration Regulations

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

11 AAC 02 Regulations

11 AAC 02.010. Applicability and eligibility.

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

11 AAC 02.015. Combined decisions.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

11 AAC 02.040. Timely filing; issuance of decision.

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

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

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

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

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

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

11 AAC 02.050. Hearings.

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

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

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

(c) In a hearing held under this section

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

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

11 AAC 02.060. Stays; exceptions.

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

(b) Repealed 9/19/2001.

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

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

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

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

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

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

11 AAC 02.070. Waiver of procedural violations.

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

11 AAC 02.900. Definitions.

In this chapter,

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

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

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

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

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

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

Appendix D SSE-1395-K Northwest Coffman Timber Sale Comments & Responses

Preliminary Best Interest Finding Northwest Coffman Timber Sale (SSE-1395-K) Comments

Department of Natural Resources, Division of Forestry & Fire Protection
May 2026

Commenter	Organization
Mark Minnillo	ADF&G Habitat Office
Sarah Meitl	Alaska State Historic Preservation Office (AKSHPO)/Office of History and Archaeology (OHA)

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The following comments were received during the public comment period on the Preliminary Best Interest Finding for the Northwest Coffman Timber Sale (SSE-1395-K):

Commenter	Topic	DOF Response
Scope of Decision		
Mark Minnillo, ADF&G	As mentioned in the PBIF, the included maps contain a conceptual layout of timber to the northwest of Unit 13 (Units 16-20). Because these areas are not part of the proposed sale, our comments for these areas should be considered preliminary. It is understood that if any or all of the conceptual harvest units eventually become proposed timber harvest units they will be included in a separate DPBIF and we will provide more detailed comments at that time.	Comment noted, no change required.
Wildlife		
Mark Minnillo, Area Habitat Biologist, (ADF&G)	Sitka black-tailed deer (<i>Odocoileus hemionus sitkensis</i>) preferentially select old-growth forest during winter, as the multi-layered canopy intercepts snowfall and keeps forage available (Hanley, 1984, Gilbert et al. 2017). Removing important deer winter habitat has the potential to negatively impact deer population survival, reproduction, and movement during winters with significant snowfall. To better understand the implication of forest type on snow accumulation, Kellam (2023) measured snow depth and evaluated old-growth, thinned and unthinned stands, and unforested sites. Thinned stands accumulated snow similar to unforested sites and showed that thinned forests provided little forage value to deer during deep snow winters. During a normal snow load year, snow depths were similar in old-growth and unthinned stands, yet during deep snow winters old-growth provided available forage for deer. These results provide an important context for understanding the impacts of snowfall on the value of various forest types and treatments to deer during winter, especially in light of the snowfall event experienced this year and the level of winter mortality that we have already documented. Adjacent to these timber harvest units, deer winter habitat has previously been reduced by logging near Coffman Cove. Although this timber sale is relatively small, it predominantly includes important winter deer habitat between previous timber harvest units. ADF&G expects the overall impact of this timber sale to the GMU 2 deer population to be relatively small. However, the cumulative effect of this additional harvest to this localized deer population should be considered as this area is identified in the	Comment noted. The DFFP plans to consult with ADF&G on thinning proscriptions and prioritize efforts near Coffman Cove. The DFFP precommercially thinned approximately 211 acres one half mile west of the proposed sale in 2025.

	POWIAP as an important community harvest area with intensive community use. We recommend that the DFFP work with ADF&G to prioritize these and older stands near Coffman Cove for effective thinning treatments, prior to stem exclusion, as this would benefit deer and hunter harvest opportunities.	
Mark Minnillo, Area Habitat Biologist, (ADF&G)	ADF&G recently commented to DNR on the POWIAP revision and included updates to deer winter habitat and black bear concentrated use areas. Those maps are provided here as they apply to the state land identified in the NW Coffman Timber Sale (Fig. 1 and Fig.2). The resource selection function map of crucial winter deer habitat (Fig. 1) was produced from the covariate values generated from 61 female deer GPS collared on POW between 2010–2013 (Gregovich et al. 2024). The factors that significantly contributed to this habitat map included elevation, slope, distance from open/closed roads, solar radiation, and understory cover. The value of this research is profound at the larger study area as there are major winter habitat characterizations that are more difficult to observe in this smaller area, however the habitats identified in blue (Fig. 1) are valued as the top 20% of all winter deer habitat, highlighting the relative importance of this state land to deer. This data may benefit future efforts to prioritize restoration through pre-commercial thinning or other disturbance treatments.	Comment noted. No change required.
Mark Minnillo, Area Habitat Biologist, (ADF&G)	The black bear concentrated use map (Fig. 2) was produced from 59 black bears GPS collared between 2009–2013 on POW (Porter et al. 2021). The seasonal concentrated use areas were directly mapped from the utilization distribution of locations occupied within this area. We anticipate that the accommodations for anadromous fish streams near Unit 1 and 2 will provide some protection for black bears during the late summer and autumn seasons when they fish for salmon along Coffman Creek. We recommend adjusting the eastern boundary of Unit 2 uphill to the contour to the left (Map Focus: Unit 2) to provide additional security and wind firmness near the non-catalogued anadromous tributary stream. An additional mitigating buffer along the southern boundary of Unit 2, would greatly benefit black bears as the hill slope that makes up the edge of the Unit (approximately 300–350m from Coffman Creek) was exactly where bears went to rest when not fishing in late summer and autumn.	The DFFP has moved the proposed unit line on the east side of Unit 2 to accommodate the ADF&G comment on wind firmness and its possible effect on the identified bear habitat of importance. The southern boundary of Unit 2 corresponds to a timber type change from old growth timber to the 50-year-old young growth stand to the south along Coffman Creek Estuary. It also is proximate to the clearing limits of the access road. The type boundary is our preferred and planned unit line due to projected wind firmness.
Mark Minnillo,	Unit 4 The Tongass National Forest Land and Resource Management Plan	The DFFP plans to implement Unit 4 as shown in the PBIF. The PBIF proposed units considered wind firmness in the design. The

Area Habitat Biologist, (ADF&G)	provides a 1,000 foot marine shoreline buffer to help maintain important deer winter habitat. Based on winter habitat selection of deer and the seasonal concentrated use of black bears in this Unit, additional allowances for wildlife habitat are recommended in Unit 4. Given the peninsular shape of Unit 4, this Unit provides rather unique access for black bears to anadromous and marine resources. What appears to be prior logging history along the northern and eastern shoreline as evidenced from aerial imagery will likely compound movement and forage availability challenges for deer in winter. We recommend reducing the Unit 4 boundary by an appropriate distance to improve timber wind firmness, which will enable wildlife movement corridors and access to winter forage for deer.	legacy logging referenced on the northern and eastern shorelines is approximately 50 years old. We do expect to see some turnover of the adjacent young growth related to removing the old growth stand in the middle of the peninsula. The width of the remaining young growth stand is wide enough to be considered capable of resisting wind damage. The young growth understory was observed to be relatively open in structure on the north end and not a significant wildlife travel barrier. Elevation is low and topography flat.
Mark Minnillo, Area Habitat Biologist, (ADF&G)	The roads built through this sale could improve hunter access and timber harvest will produce deer forage in the short-term during the stand initiation phase of the young-aged clearcut.	Comment noted. No change required.
	While shovel logging methods of tree removal may lessen the amount of slash, which inhibits deer movement and forage initiation, we request that contractors remove remaining slash by bucking, piling, chipping, burning, etc. to facilitate wildlife travel and hunter access in harvest units.	The DFFP has mechanisms in its existing contracts to manage slash with respect to providing adequate reforestation. The residual conditions typically provide access to the area for wildlife and hunters. The overall depth of slash is contractually required to be under two feet or concentrated in piles in the case of logs that are not removed.
Mark Minnillo, Area Habitat Biologist, (ADF&G)	Consistent with the goals of the POWIAP, we recommend mitigating habitat loss for deer and bear habitat by minimizing the reduction in the quantity and quality of wildlife habitat. We fully acknowledge that this timber sale will generate economic benefits to the residents of POW. We must also recognize the contributions to economic diversity that result from conserving wildlife resources and the direct economic benefit of subsistence, sport hunting, and the commercial outfitters and guides who utilize these resources.	Comment noted. No change required.
Fisheries		
Mark Minnillo, Area Habitat Biologist, (ADF&G)	Unit 1 Unit 1 is bordered on the west side by the uncatalogued portion of catalogued stream 106-30-10250 and an uncatalogued tributary to catalogued stream 106-30-10160. Although ADF&G has not conducted any surveys in these areas to investigate the evidence or presence of anadromous fish, based on the topography and visual observations of fish by DOF&FP, timber retention areas of at least	Comment noted. No change required.

	<p>100 feet have been left along these waterbodies.</p> <p>On October 20, 2025, ADF&G personnel accompanied timber layout personnel on an inspection of the upper, uncatalogued portion of cataloged stream 106-30-10220 located along the northern boundary of Unit 1. Several small tributary streams found to contain fish were identified, the upper extents of which are shown on the Unit 1 map just outside of the harvest unit. The tributary streams are low gradient and located in a mostly saturated palustrine area. We appreciate the fact that DFFP pulled the unit boundary upstream of the extents of the tributaries.</p>	
<p>Mark Minnillo, Area Habitat Biologist, (ADF&G)</p>	<p>Unit 2</p> <p>Unit 2 is located between two uncatalogued tributaries of cataloged stream 106-30-10160. According to DFFP these streams were determined to be anadromous based on gradient, connectivity to a known anadromous waterbody, and the presence of fish. We concur with DFFP's determination and with the retention areas left along these waterbodies.</p>	<p>Comment noted. No change required.</p>
<p>Mark Minnillo, Area Habitat Biologist, (ADF&G)</p>	<p>Units 3 and 4.</p> <p>The area to the west of Units 3 and 4 includes the estuarian portion and associated wetlands of cataloged stream 103-60-10250. This area is not only important for fish but also for various species of wildlife and waterfowl. We concur with the DOF&FP's decision to pull the western boundary of Unit 4 well away from this area. Doing so will maintain important fish and wildlife habitat and provide more wind firmness of the timber to be left. Also associated with the 103-60-10250 drainage are the proposed crossing locations A (Unit 4) and B (Unit 3). According to the PBIF crossing B is the preferred crossing. Because this crossing is located much further upstream than crossing A (in the uncatalogued portion of stream 103-60-10250), we concur that crossing B should be the preferred crossing location. A Fish Habitat permit will be required for the crossing structure installed at this location. Because this area is prone to beaver activity, it is highly likely a crossing structure installed at this location will be impacted to the point of blocking fish passage. ADF&G recommends the crossing structure be removed upon the completion of timber harvest activities. Should the crossing structure remain in place it may require ongoing maintenance in the future to maintain efficient fish passage.</p>	<p>The DFFP requests verification of the current habitat extent this summer.</p> <p>The DFFP plans to meet the intent of the FRPA and will evaluate the State's ability to maintain the crossing structure at the time of sale closure. Comment noted. No change required.</p>
<p>Mark</p>	<p>Units 10 and 11</p>	<p>No fish were observed. The retention of timber reflects the DFFP</p>

Minnillo, Area Habitat Biologist, (ADF&G)	As shown on the harvest map, there is what appears to be a substantial uncatalogued surface waterbody that flows between units 10 and 11 and enters a salt chuck. It appears that a riparian retention area has been left on both sides of this surface waterbody. ADF&G has no record of fish use for this waterbody however, we concur with the included riparian retention area.	observation of potential suitability for fish rearing habitat not the presence of fish. The DFFP requests that ADF&G look at the referenced stream for evidence of fish during the next available period in 2026 that fish are likely to be observable. The division will reevaluate the need to retain timber on this stream and the values at risk again when it prepares the FLUP. Comment noted. No change required.
Mark Minnillo, Area Habitat Biologist, (ADF&G)	Unit 14 The northern half of Unit 14 is bounded on the west by an uncatalogued stream shown on the layout map as a “surface water”. It appears that a riparian retention area has been left on both sides of this surface waterbody. ADF&G has no record of fish use for this waterbody however, we concur with the included riparian retention area due to the likelihood of this waterbody providing anadromous fish habitat.	
Mark Minnillo, Area Habitat Biologist, (ADF&G)	Units 15/16/20. The stream shown between units 20 and 15/16 as a surface water is an uncatalogued stream for which ADF&G has no data. We would concur with the proposed riparian retentions areas shown on both sides of the stream but would also be available to conduct a survey of the stream should it become necessary. Cataloged stream 106-30-10220 is located to the west of units 18 and 19. As with harvest units 3 and 4, we would encourage DNR&FP to include a riparian retention area of more than 100 feet to not only protect the important fisheries habitat but to also ensure wind firmness is this area.	
Cultural and Historic		
Sarah Meitl (AKSHPO)/ Office of History and Archaeology	OHA believes that adverse effects can be avoided provided that: 1) an avoidance buffer of 100 – 150 feet is applied to each of the sites in <i>Table 1</i> , Page 2) an avoidance buffer on 150 feet is applied to all anadromous streams and shorelines, and 3) the project team implements the inadvertent discovery process if a cultural resource has been impacted by the project in accordance with Section 41.35.070[d].	The OHA sites referenced in Table 1 of the memo have been redacted from the record, as they are considered confidential information under AS 40.25.110. These sites are either well removed from the proposed harvest footprint or have avoidance buffers incorporated into the proposed harvest design that exceed the recommendation. The DFFP has incorporated shoreline retention exceeding 150 feet along shorelines for a variety of resource management purposes. Cataloged anadromous streams have likewise been avoided through unit design, with all timber within 150 feet retained. Timber has also been retained within 100 feet of uncatalogued anadromous streams, in accordance with AS 41.17.118. The decision document reflects the intent to respect all cultural resources inadvertently discovered and to notify the OHA in accordance with AS 41.35.070[d].