

**STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF FORESTRY**



**SOUTHERN SOUTHEAST AREA FORESTRY
FINAL BEST INTEREST FINDING
AND DECISION FOR
VALLENAR BAY TIMBER SALE
SALE NUMBER, SSE-1345 K**

May, 2015

I. PROPOSED ACTION

The Division of Forestry (DOF) is proposing to offer for sale approximately 600 acres of young growth and old growth timber in the Vallenar Bay area as part of long term forest management of the State Forest. Vallenar Bay is located on Gravina Island near Ketchikan, Alaska. The volume to be offered totals approximately 12 million board feet (MMBF). The project proposes to establish access to the Vallenar Bay area from the existing road system on Gravina Island by constructing a forest road from the Lewis Reef area to the existing logging road on the southeast side of Vallenar Bay. Depending on market conditions, the DOF would sell the timber as one individual sale, several smaller sales or combined with other timber in the area. The sale(s) will be sold under the authority of AS 38.05.120 (competitive sale) or under AS 38.05.115, AS 38.05.118 or AS 38.05.123 (negotiated sales). The sales will be noticed as required by sale type authority and AS 38.05.945 prior to being sold.

The management objectives for the project are:

1. To follow the Alaska Department of Natural Resources' (DNR) constitutional mandate (Article 8.1) to encourage the development of the State's renewable resources, making them available for maximum use consistent with the public interest,
2. To help the State's economy by providing royalties to the State in the form of Stumpage receipts, an infusion to the State's economy through wages, purchases, jobs, and business,
3. To help the local economy of the communities within southern Southeast Alaska by creating additional jobs in Southeast Alaska due to the combination of road building, logging, trucking and potentially milling.

II. 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 or not to proceed with the action as proposed. This record will be maintained at the DOF's Southern Southeast Area (SSE) Office filed as Sale # SSE-1345 K.

IV. SCOPE OF DECISION

This final best interest finding (BIF) completes part two of a six-part process to design, sell, and administer timber sales. This BIF covers the proposed access and potential sale of approximately 300 acres of marketable young growth timber and 300 acres of mixed aged timber with old growth

characteristics on State land within the 2,400 acre Vallenar Bay planning unit of the Southeast State Forest. The following list summarizes the overall process:

Part 1: Regional planning. The 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 sales. Subsequent land use decisions must be consistent with the area plans. The area in this BIF is covered by the Central/Southern Southeast Area Plan (CSSAP) as two separate units called the North Gravina and Vallenar Units and in the Draft Southeast State Forest Management Plan (SESFMP) delineated as one unit called the Vallenar Unit. The proposed access route is within the Ketchikan Gateway Borough (Borough) and this finding considers the Borough Comprehensive Plan 2020 and area specific plans for Gravina Island (North Gravina Area Plan and the Central Gravina and the Airport Reserve Area Plan).

Part 2: Best Interest Finding. DOF must adopt a final BIF before selling timber. A best interest finding is the decision document that:

- Ensures that 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.

DOF issued a Preliminary BIF covering the decision to sell approximately 600 acres of young growth and old growth timber in the Vallenar Bay area as part of long term forest management of the State Forest in a competitive or negotiated sale for commercial use on February 2, 2015. DOF considered all written comments received during the 30-calendar day review period. Responses to the comments are listed in Appendix E.

This document is the final BIF for the Vallenar Bay Timber Sale. A person affected by the final decision who provided timely written comment or public hearing testimony on the preliminary decision may appeal it, in accordance with 11 AAC 02.

Part 3: Five-year Schedule of Timber Sales (AS 38.05.113). The SSE Area prepares a Five-year Schedule of Timber Sales every other year. The Schedule identifies proposed sales, including their location, volume, and main access routes. The Five-year Schedule is a scoping document that provides an opportunity for public, agency, and industry to identify potential issues and areas of interest for further consideration in the Forest Land Use Plan. Proposed timber sales within the area covered by this BIF must appear in at least one of the two Five-year Schedules preceding the sale. The activity associated with this timber sale was noticed in the Five-year Schedule of Timber Sales published in July of 2013. The CSSAP (Chapter 3) required noticing harvests in two FYSTS based on the applicable statute at the time. In 2003, the statute was changed to the current standard.

Part 4: Forest Land Use Plans (AS 38.05.112). Prior to authorizing harvest of timber on any area greater than 10 acres, the DOF must adopt a site-specific Forest Land Use Plan (FLUP) for the harvest area. DOF will prepare FLUPs for harvest areas within the overall sale area covered by this best interest finding. FLUPs specify the site, size, timing, and harvest methods for harvest units within the sale area. FLUPs also address site-specific requirements for access construction and maintenance, reforestation, and multiple use management. Draft FLUPs will be based on additional field work and site-specific analyses by the DOF. Appropriate regulatory agencies and the Borough Planning Department will be consulted and the plan is subject to public review. The timber sale FLUPs will consider the cumulative impacts in the project area as each sale is designed and sold. The DOF estimates that it will notice the first of several FLUPs for the planning unit in the spring of 2015 covering only the construction of the access roads to the area. The DOF does not plan to sell timber in this area until the SESFMP is adopted.

Part 5: Timber sales and contracts. Following adoption of the final best interest finding the DOF intends to construct the road under a public works contract and will in turn offer the timber for sale by auctioning competitive sales and/or negotiating with purchaser(s). The Division will sign a contract with the winning bidder for each sale. The contracts include stipulations to ensure compliance with the best interest finding, FLUP, and statutory requirements.

Part 6: Sale administration. DOF administers contracts and conducts field inspections to ensure compliance with the final best interest finding, FLUP, timber sale and road contracts, and applicable laws, including the Alaska Forest Resources and Practices Act 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 project area is on the north end of Gravina Island. Vallenar Bay is approximately five miles west of the Ketchikan International Airport and is viewable on USGS quadrangle Ketchikan B-6. The project area occupies State and Borough land in Sections 5, 6 and 8 of T75S, R90E; Sections 35 and 36 of T74S, R89 E; Sections 1, 2, 11, 12, 13, 14, 23 and 24 of T75S, R89E all within Copper River Meridian (CRM).

B. Title status:

The State Forest Land in this project area was patented on January 9, 1992 (Patent 50-92-0143, AA-18033, NFCG) to the State as part of Section 6(A) of the Alaska Statehood Act of 1958. Within this parcel is a reserved Right of Way for the existing Forest Development Road (FDR) No. 8110 within Sections 11, 12, 13 and 24, T75S, R89E all in CRM having a width of 66 feet.

The Borough land associated with this project is in Lot 2-B-2 of Alaska State Land Survey 95-12, according to the survey plat recorded in the Ketchikan Recording District on April 22, 1998, as Plat 98-15, Township 74 and 75 South, Range 89 and 90 East, CRM. Lot 2-B-2 was conveyed to the Borough as a State Municipal entitlement in State Conveyance Number 19194. On De-

cember 2, 2014 the State of Alaska recorded a public access easement from the BOROUGH on Lot 2-B-2 for a proposed forest road as part of this project.

C. Land use planning, classification, and management intent:

The proposed area on State land is within the Southeast State Forest and is specifically referred to as the Vallenar Unit. The CSSAP (2000), the Prince of Wales Island Area Plan (1985), and the Prince of Wales Island Area Plan Amendment (2008) are providing interim management guidance for the Southeast State Forest pending adoption of the SESFMP. 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 upon adoption of a the forest management plan.

In the CSSAP the areas have been described in two separate units called the North Gravina and Vallenar. Until the SESFMP is adopted by the DOF the land will be managed under the management intent of the CSSAP. The management intent for each planning unit is as follows:

K-25 (the northern half of the project area). Classification: General Use
Parcel is to be managed for multiple uses, including habitat, dispersed recreation, and current and future forest values. Timber projects undertaken may include timber sales, pre-commercial forest thinning and pruning. “A coastal maintenance area shall be maintained along part of the coast that is not within the State subdivision. Timber harvest within the first 500 feet is considered inappropriate, although selective harvest may occur within the 500-1000 foot area. Proposed BIF/FLUP shall give consideration to the potential impacts on dispersed recreation, habitat, and wildlife movement corridors and use appropriate protection and/or mitigation techniques. A proposed timber sale shall also follow the area wide guidelines described in the area plan Chapter 2” (CSSAP).

K-33 (the southern half of the project area). Classification: General Use
“The parcel is to be managed for multiple uses, including habitat, dispersed recreation and current and future forest values. During the planning period, timber projects undertaken may include timber sales, pre-commercial and commercial forest thinning to improve forest productivity and habitat, and pruning to improve wood quality. A buffer of up to 500 feet adjacent to and on either side of Vallenar Creek shall be provided if the FLUP planning process determines that this width is important for wildlife movement, continued community harvest, or riparian habitat protection. A minimum width of 300' along each side of the creek shall be provided. A minimum no-harvest buffer of 100 feet shall be maintained on all anadromous streams; if determined necessary in the FLUP, this width may be increased to 300 feet. A proposed timber sale Forest Land Use Plan/Preliminary Decision/Final Finding shall give consideration to the potential impacts on dispersed recreation, habitat and wildlife movement corridors, anadromous streams and associated riverine wetlands, and use appropriate protection and/or mitigation techniques. The FLUP should also given consideration to the use of management practices that will minimize visual impacts (from subdivision areas and Vallenar Bay) and potential siltation into the estuarine wetlands at the mouth of Vallenar Creek. A proposed timber sale must follow the guidelines of Chapter 2 as well as other pertinent state laws and regulations. Land disposals are not recommended in this

parcel. Vallenar Bay is very shallow, making water access difficult, and the tidelands fronting the potential settlement area contain valuable estuarine wetlands.”(CSSAP)

The specific intent language in Alaska Forest Resource and Practices Act and Regulations (FRPA) for the State Forest System:

“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.”

“AS 41.17.500. Southeast State Forest. (c) The commissioner may establish transportation corridors within the Southeast State Forest.”

The State project area is open subject to leasehold location with respect to mining.

A small portion of the proposed logging road and log transfer facility (LTF) is located on the Airport Reserve and subject to the DOTPF Airport Master Plan and the Airport Layout Plan. The Airport reserve is managed by the BOROUGH under lease (ADA-05175) from the ADOT. The project area covered by the airport plan is also referred to specifically by Borough as the Gravina Island Industrial Complex (GIIC). The Borough is also the land owner/manager on record for the existing ADEC APDES Permit AKG701062 for the LTF located at the GIIC. Under an agreement signed between DOF and the BOROUGH (2/09/2013), the Borough authorized DOF to access and use the GIIC to transfer timber off of State land on Gravina Island.

The Borough and State lands located in this project are classified as Future Development on Borough zoning maps. The Borough code (KGBC) 18.25.010 categorically defines natural resource extraction (timber harvesting) as a permitted use allowed with a zoning permit in Future Development. In KGBC 18.55.050 (6) specific information is listed as required to be submitted to the zoning official for issuance of a zoning permit. KGBC 18.25.020 (g) (footnote 17) further states “For all logging, mining and similar industrial extractive activities, a strip of uncleared land at least 100 feet wide shall be provided between such uses and all public rights-of-way and all adjoining boundaries of residential zones or recreational areas.”

The location and construction of the road on Borough land was authorized in Borough Assembly Resolution # 2544 and requires no zoning authorization by the Borough.

D. Current access and land use:

Existing access to the project area is predominately by boat or air combined with walking. The State Forest land and the access easement on Borough land are undeveloped. The area is presently used for remote recreation such as hunting, fishing and berry picking. No active land management activities are presently taking place.

The start of the project is at the northwest corner of the GIIC which is a decommissioned sawmill that was active for several years in the later part of the previous decade. Incidental storage and staging is intermittently occurring at the site with Borough authorization.

The Borough entered into an agreement with Niblack Project LLC in August of 2012, giving Niblack Project LLC priority use rights to the GIIC. The use has been described publicly as a possible staging area for mine support activities and primary processing site of ore associated with a proposed mine on Prince of Wales Island.

Under an agreement signed between DOF and the Borough (2/09/2013), the Borough authorized DOF to use the GIIC to transfer timber off of State land on Gravina Island in a manner that would avoid and minimize potential conflict with the Niblack Agreement.

A GCI cellular communication tower is in the planning stage of development 400 feet southeast of the start of this project on the GIIC near the old shop building.

Private land (Gravina Island Subdivision Block 2, Plat Volume 1, No. 113) occupies the adjacent waterfront land to the northeast for the first mile of the access road located on Borough land. These lots are accessed by water from Tongass Narrows. Remote residential and commercial development has occurred on several of the lots. Only a few are actively being developed or have current residents at this time.

Private land (ASLS 85-86, USS 1768 and USS 1350) also occurs adjacent to the east side of this project on the south and east side of Vallenar Bay. This remote area has a few residents and several seasonal cabins that are accessed by saltwater.

An existing old logging road is located on the east side of the Vallenar valley and is referred to as the FDR 8110 because it is a federal right of way reserved in the federal land patent to the State for the uplands. The road is overgrown with mature alder that functionally only allows foot access. The drainage structures (log culverts) on the road were not removed at the end of its use in the early 1950's and have deteriorated along with the ditches to the point of being non functional. The FDR 8110 easement is defined across USS 1768 as well as State land and was re-traced as part of the engineering scope of work for this project. The extent of the ROW is limited to the upland areas of both the State and USS1768 land. The historic logging road extends into the tidelands and was used originally to move logs to tidewater from the adjacent uplands. The road in this area was constructed through the use of log cribbing and piles and shows significant signs of decay from tidal and riverine erosion from Vallenar Creek. The estuarine area was conveyed to the State in the Tide and Submerged Land Act and was not reserved for federal access to the upland section of the FDR 8110. The CSSEAP notes the tideland area as important

for its estuarine wetlands and the adjacent low elevation uplands; the Division of Mining, Land and Water (DMLW) views the historic tideland section of the road as part of the greater tidelands complex at the head of Vallenar Bay.

The University of Alaska (UA) trust land that lays to the west of the Vallenar Bay project area is undeveloped remote land. The UA voiced an interest in potential access to the forest road proposed in this project in order to more actively manage forest resources on the UA land. Management decisions and activity associated with UA land management are not part of this proposed project decision.

E. Background and description of proposal:

1. Background: The State seeks to access State Forest land in the Vallenar Bay area to encourage sustainable development of the State's forest resources, making timber available for sale and harvest. The demand for State timber is significant at this time due to the uncertainty of the federal timber supply and the diminished activity on Native corporation lands. The majority of the State Forest land base in southeast Alaska is remote. The Vallenar tract is relatively close to the community of Ketchikan and offers long term forest resource values close to a regional hub. The State Legislature with this perspective in mind made \$5,000,000 through the ADOT (Roads to Resources Program) available to DOF for connecting the existing Gravina Island road system to public land in the Vallenar Bay area.
2. Timber volume and sustained yield: The identified merchantable timber base that meets economic and environmental constraints on State Forest land in the Vallenar Bay planning unit is composed of approximately 600 acres (see Exhibit B). Refinement of the harvest units will be documented in the FLUPs. The estimated volume practical to harvest in the project area is estimated at 12 MMBF. The Division of Forestry is required to manage its' timber harvest 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 Division's policy is to define "regular periodic output" as output over a ten-year period. This is done to allow for market fluctuations and operational restrictions. Based on the DOF inventory of the land and the timber base it uses an annual allowable cut of 12.135 MMBF per year for the Southern Southeast Area. The location of the project and the mix of timber types, will allow the DOF to meter the volume offered for sale without exceeding the annual allowable cut. Timber sales that are sold will be within the allowable cut and comply with sustained yield requirements at the time they are sold. The duration of the timber sale contract(s) will be governed by the division's administrative capability and the economic conditions at the time of the sale.
3. Harvest unit design: The timber is composed of several different timber types in two distinct age classes; a maturing young growth and old growth timber. The timber proposed for harvest is located in two distinct areas; along the southwest face of California Ridge and on the west side of the Vallenar valley at the base of Dall Ridge.

The DOF will publicly notice and adopt one or more FLUPs prior to the harvest of timber greater than 10 acres. Borough code also requires obtaining a Borough zoning permit for the harvest of timber.

California Ridge Area

A small amount of old growth timber exists on the north end of the project area on State forest land composed predominately of hemlock and spruce with occasional western red cedar and Alaska yellow-cedar. This timber occupies the toe and side slope of the north end of California Ridge. It is typically decadent and relatively tall timber; harvest in this area will be a combination of patch cuts to retain forest values near the subdivision while allowing for safe and operational management of the forest road. The patch cut system involves removal of an entire stand of trees *less than 3 acres in size* from an area. Each patch cut is managed as a distinct even-aged opening. Regeneration is obtained either by artificial or natural regeneration, or a combination of the two. The unit design will target recovering value from right of way clearing and proactively managing wind throw and debris that could reach the proposed main access road. A significant amount of natural blowdown has already occurred in this area. Some harvesting of trees along the road is likely to be required for operational safety.

The Vallenar Bay Road adjacent to the ASLS 84-85 subdivision and the northeast corner of USS1768 is sited approximately 66 feet from the lot lines due to steep topography located on the east side of the proposed road and a desire to maintain clearance for construction of the road from private property to the west. For operational safety during construction and operations (AS 41.17.200), cost effective maintenance and a desire to visually transition to the subdivision, individual trees will be evaluated on a case by case basis and designated for harvest by DOF in the area west of the proposed road. Wind firm trees will be retained where safe and practical between the road and the lots. For USS 1768 the retention area of 100 feet established by KGBC 18.25.020 (g) (footnote 17) can be maintained except for the northeast corner.

Further to the south the timber is 60-70 year old maturing “young growth” composed of Sitka spruce, western hemlock and red alder. The area was previously logged just after WWII. The hill side is benched and will govern the unit layout and allow for mechanical harvesting techniques to be employed on half of the terrain. Mechanical harvesting typically involves the use of large machinery to fell and process (limb and buck) trees into logs and subsequently move the logs to the road. Due to the exposure of the area to prevailing southeasterly winds, unit design will take the form of clear cuts to minimize waste caused by wind throw. Size and shape of the units will follow terrain due to its influence on the timber’s size. The steeper sections of the hillside will influence harvest design due to the timber size and the economics of operating on steep ground. Cable systems may be used in these areas. The design of the units will take into account the soil stability of the area and associated risk of affecting other resources.

Dall Ridge Area

The timber on the west side of the project area is composed of a mottled timber type of decadent western red cedar and western hemlock with occasional Alaska yellow cedar. The timber is generally located on the sides and tops of several small knobs on the north end of a sub ridge of Dall Ridge. This harvest area will have an irregular shape and likely have several distinct units due to the scrubby and broken ground of the area. The harvest method will likely be by shovel logging techniques. Shovel logging uses a log loader to swing logs to the forest road. Rather than driving out to the log and dragging it back to the landing, the loader moves slowly across the harvest area, grabbing logs/trees within reach, and swinging them around to drop them closer to the road. Logs further from the road can be shoveled to the landing in a few passes back and forth.

- a. Reforestation and site preparation: The sale area will be reforested in compliance with the Forest Resources and Practices regulations (11 AAC 95.375-.390). Reforestation in Region I (southeast) is typically done through natural seeding that is aided by the scarification of the site during logging. Seedling counts in Southeast at five to seven years post harvest are typically an order of magnitude greater than required by FRPA. The DOF may require the timber sale purchaser to replant areas under 30% slope with seedlings to reduce the rotation time until next harvest. Seedlings may not reflect the existing stands species composition but will be species that are native to the region. The DOF will conduct post harvest reforestation inspection of the area to ensure the stocking meets FRPA requirements for regeneration.
- b. Access design and construction: Road design, construction, and maintenance will comply with the Forest Resources and Practices regulations (11 AAC 95.285-.355).

Access to the Vallenar area is proposed in the form of a single lane secondary forest road (14FT wide shot rock running surface with intervisible turnouts) with a design speed of 20 MPH. The road construction parameters required by FRPA best management practices will be detailed in a FLUP along with the timber incidental to the construction of the road.

The DOF through the DMLW Realty Services Section acquired a perpetual road easement from the Borough in December of 2014 for access to State Forest Land as part of this project. Material sources along the easement are part of the allowed use of that easement.

The proposed route starts at the Gravina Island Industrial Complex and proceeds north across Borough land for approximately 3 miles, then turns southwest and enters State Forest land (in the vicinity of the common corner of Section 35 and 36, T74S, R89E and Sections 1 and 2, T75S, R89E all in CRM) at which point it continues southwest through a pass until it approaches Alaska State Land Survey (ASLS) 84-85, at which point it turns southeast continuing on State Forest land to

a point that it intersects with the FDR 8110 easement near the north side of Section 13, T75S, R89E, CRM. Approximately 0.25 miles south of this intersection the 3000 Road is proposed to intersect FDR 8110 to access State Forest land and potentially the University of Alaska land to the west and across Vallenar Creek.

The location of the start of the Vallenar Road was mutually agreed to by the State and Airport Manager as fitting within the Ketchikan Airport Development Plan. Rock developed for the project on Airport Reserve land will benefit the airport in fee (fair market value) and configuration. Rock will not be taken off of the airport reserve beyond what is required to access an economically developable rock source along the ROW or adjacent land ownership.

The DOF consulted with Borough staff and reviewed Borough planning documents to focus on the routes that might see Borough future use based on their planning goals, thereby potentially limiting indirect cumulative impact to habitat. Future use of the Borough land is not permitted, funded, or scheduled at this time. The topography also led the design team to generally locate the road higher on the hillside and consequently avoid anadromous habitat altogether.

The DOF examined a variety of locations along the chosen corridor of the preferred alternative. The proposed corridor crosses several cataloged and uncataloged anadromous streams. During the scoping process for this project the ADFG-Habitat Division was consulted and visited the project to aid in the identification and classification of the habitat. Where ever possible anadromous habitat was avoided and the design developed to minimize the potential for affecting water quality during construction and use of the road. Wildlife habitat was also strategically avoided when practical in the siting of the roads on State Forest land by consulting and visiting the site with ADFG-Wildlife Division.

The DOF spent significant time looking at the practicality of locating the Vallenar Road farther from the Vallenar Bay Subdivision (AS84-85) on the east side of Vallenar Bay to retain the 100 foot retention zone noted in KGBC 18.25.020 (g) (footnote17). The steep hillside and the elevation of the road as it departs from the pass to Tongass Narrows preclude moving the road away from the subdivision significantly. Road construction on the steeper sections of the hill would expose the subdivision to unnecessary risk by disturbing soils, drainage and timber. As located, the road is at the toe or just down slope of the hillside and on stable ground.

Where the project approaches residential lots in Vallenar Bay, the Borough Planning Department has indicated that a variance per KGBC 18.55.040 may be required for resource extraction operations including timber harvest occurring within the 100-foot zone adjacent to residential use lots. Where practical and safe, DNR will design the route to retain the 100-zone in an undisturbed manner. However, a portion of the safest access route encroaches on the 100-foot zone established by the Borough. This incursion does not require a Borough variance be-

cause the statute establishing the SESF authorizes DNR to establish transportation corridors on state land in the State Forest (AS 41.17.500(c)); further, AS 41.17.200 limits the management of the State Forest in relation to other public resources to only that which is necessary for the purpose of the State forest.

Numerous water quality streams were identified draining into Vallenar Creek and Vallenar Bay on State land. Due to the road's relatively high elevation until it intersects with FDR 8110, fish habitat was avoided until the crossing of the Vallenar valley bottom. Inherently unstable soils were avoided with the road location to provide a firm foundation for the road that would not be subject to erosion or raveling.

As long as funds are available to maintain inactive forest roads to FRPA standards, the Vallenar Road from the GIIC to the FDR 8110 will remain open for incidental public use following timber harvest. The practicality of leaving forest roads open for vehicle traffic is directly related to stakeholder use agreements defining funding sources for maintenance.

The other roads in the project (FDR 8110 south of the 3000 Road junction and the 3000 Road) are proposed to be closed to motorized vehicles post-harvest unless needed for specific land management action. Use by off road type vehicles on the closed road bed will likewise be discouraged unless water quality can be maintained.

The DOF plans to not open a short section of FDR 8110 north of the Vallenar Road intersection to the southern lot line of USS1768 at the time the rest of the road is initially reconstructed because it is not required for this project. This is being done to mitigate its potential to contribute to nonpoint-source water pollution, as well as comply with the area plan management intent for the Vallenar Bay intertidal area located at the end of this section of the road.

Pedestrian access will not be restricted and likely will be considered by most users to be better than present conditions.

- c. Appraisal method: DOF will appraise the timber value in compliance with 11 AAC 71.092. The sale area will be appraised by using a residual value appraisal method. Selling values and extraction cost numbers are obtained from industry sources, the United States Forest Service and previous operations.

F. Resources and management

1. Timber:

a. Timber stand composition and structure:

The project area old growth timber is composed predominately of hemlock with occasional spruce and western red and Alaska yellow cedar. It is decadent and relatively tall timber (two to three logs per tree) on the east side of Vallenar Bay and relatively short (one to two logs) and of poor form on the west side of the bay. The timber has a dense canopy in the taller stands with occasional wind throw openings. The shorter stands exhibit poor soil (wet) that influence and produce openings and scrubby timber.

The young growth in the project area is relatively dense and maturing timber with little defect. Areas that are not growing Sitka spruce and western hemlock generally are growing red alder of size that may be commercially marketable as well. The bole lengths of the spruce and hemlock trees are generally tall enough to recover two merchantable logs. The alder patches appear to be associated with areas that were heavily scarred of organic soil during the previous harvest. Sub merchantable spruce and hemlock is evident in these areas as well.

- b. Stand silvics: The DOF desires to optimize the regeneration time and volume for commercial timber species given the objectives of the land management designation on the parcel. The silvicultural prescription that best achieves this based on past experience is clear-cut harvest. Unit size will primarily be a product of topography respecting other constraints such as soil stability and high-value fish and wildlife habitat and visual concerns. Natural reforestation will occur and DOF will verify that it meets FRPA standards. It is anticipated that some pre-commercial thinning will be done on the regenerating stand to shape the future production of merchantable products (typically sawlogs).

- c. Topography and Soils: The proposed timber sale units and roads are designed and will be managed to prevent significant impairment of the land and water with respect to renewable resources (AS 41.17.060(c)(5)).

The elevation of the project area ranges from 200 to 800 feet and is a mix of moderate slopes with steeper sections.

The soils on the Borough and State land on the east and north side of the project generally are shallow, saturated and of poor quality overlaying bedrock. The topography is composed of moderate to flat benches with short steep sections with rock out crops.

At the north end of California Ridge the road traverses a steep section of bedrock controlled ground with large boulder deposits as it goes through the pass into the

Vallenar drainage. Full bench and buttressed road construction will be used in this area where necessary to achieve stability. The exposure of the road to uphill hazards is relatively short in pitch length and the road is located in proximity to the toe of the slope.

As the road enters the Vallenar Bay drainage, the road occupies a natural bedrock bench at the base of California Ridge; soils generally deepen on this side of the ridge and are colluvial in nature. This side of the ridge above the road is relatively steep with some evidence of debris slides where the soil is prone to being saturated. The location of the road on the bench was done to facilitate stable construction without loading of the hillside with debris or changing the drainage patterns. Timber harvest in this area will likewise be focused on retaining or improving the stability of the hillside. Movement of debris associated with harvest and road construction is not predicted but may be subject to some risk from slides originating outside of the project activities.

The bottom of the Vallenar valley is an uplifted beach area with evidence of glacial deposits. Side drainages to Vallenar Creek are incised and show gravels and a layer of blue clay; these areas were avoided due to their riparian nature. The road location identified in the valley area (3000 Road) avoided topography that would require significant disturbance of obvious and inferred blue clay deposits. Blue clay can be prone to liquefaction if disturbed on steep and saturated topography; the designed location of the road is on relatively shallow sloped ground and the subgrade earthwork will be minimized to manage the potential risk.

The soil on the west side of the valley is much like the east side of the project area, with bedrock benches and outcrops with shallow saturated soil. The timber is confined to areas of better drainage on the side of the outcrops.

2. Agriculture: No agricultural use or grazing is known to occur within the area.
3. Wildlife habitat and harvest:
 - a. Area plan and involvement of ADFG:

The proposed timber sale was developed within the framework of land use plan designations and guidelines to ensure requirements for multiple use and sustained yield of timber, wildlife, and other resources would be met. The project was designed to avoid, when practical, and then minimize impacts on fish and wildlife and habitat where timber harvest occurs. The Vallenar Access project area was not identified as critical habitat in the CSSAP. This sale will be designed in compliance with FRPA regulations and once adopted, the guidelines of the SESFMP. The DOF does not plan to sell timber in this area until the Southeast State Forest Management Plan is adopted. The ADFG-Wildlife Division was consulted during the development of this project and participated in field assessment of the area to provide the expertise needed to evaluate the wildlife use and quality of habitat. The CSSAP considered a

number of different wildlife species for land allocation purposes and mitigation methodologies. This section discusses the implications of the project on deer since they are used by humans and predators and have been shown to have notable and specific interest to people. Wolves and eagles also influenced the planning decisions directly or indirectly.

b. Snow and Deer:

Generally deer have not been in high numbers for the last 20 years in Unit 1A in which Gravina Island is located. In most of the Game Management Unit 1A, snow plays a significant role in the population trend of deer. If winter conditions have low snow depth and persistence, deer population numbers typically remain steady. The quality of the habitat and location is closely related to this concept since deer do not move large distances. The population of deer on Gravina is relatively low at this time. The ADFG believes that deer on the island will rebound at some point with successive mild winter snow conditions.

c. Habitat:

A good portion of the deer habitat on the island is in the coastal fringes and drainages where the topography enables better growth of browse. The older growth timber to the west of Vallenar Creek is a mottled short timber type not particularly well suited for winter deer habitat; it has limited winter browse capabilities due to the associated vegetation. The second growth timber proposed for harvest to the east of Vallenar Creek is on a more productive site that was harvested in the early 1950's. The regenerated stand has matured and now provides a mix of characteristics that may be beneficial to deer during winter conditions but is currently supplying limited browse capability to sustain winter nutrition. Second growth timber not harvested typically slowly develops characteristics that offer cover habitat and will mature over time to provide understory food for the deer. The larger old growth timber to the east of the State subdivision has a mix of deer habitat capability but covers a relatively small area. This area will see limited harvesting due to the proximity to the subdivision and Vallenar Bay.

The CSSAP documents the importance of Vallenar Creek and the estuary wildlife and recommends protecting its tributaries as needed to support wildlife movement. Consultation with ADFG has yielded a 300-foot no harvest area on each side of Vallenar Creek and a 100-foot no harvest area on all anadromous tributaries in the drainage. Additional timber retention beyond the 300-foot Vallenar retention zone was determined unnecessary due to the topography and distribution of the timber. Scrubby timber and muskegs generally occur from the retention zone limit out for at least another quarter mile from the stream. This precludes significant forest management activity because there is generally no commercial value. This combination creates a relatively wide undisturbed north/south corridor that is entered once by the 3000 Road that crosses the valley.

Several routes were considered for the purpose of crossing the valley. The direct route was chosen though it crosses two small anadromous streams because it is the least disruptive for fish and wildlife habitat. Other potential routes paralleled streams for longer distances, had more exposure to observed wildlife travel patterns or required excavation of potentially unstable soils in proximity to fish habitat.

The smaller anadromous streams scattered across the Vallenar valley are incised, with the preponderance of merchantable timber located within the statutorily required anadromous timber retention zone (100 feet either side of the stream). The combination of the retention zones and the intermixed non-merchantable timber effectively is a labyrinth of unharvested corridors centered on the streams.

d. Timber Harvest Effects:

The State looked at the potential impact to the wildlife and specifically deer that the proposed actions might have. ADFG concluded that the areas being harvested would see a decrease in the deer population in the immediate area of the harvest. The harvest of timber will lower the capacity of the island for deer but not in an unsustainable manner. The change in availability of deer for wolf predation on the island is minor and may be more noticeable for deer hunters due to the proximity of the project to the east side of the island.

The “young growth” timber located on the west face of California Ridge is mature and offers travel cover and some winter habitat value for deer along with escape terrain due to its steep slopes. The limited area of adjacent habitat above the stand is of average value and not considered critical for deer habitat on the island. ADFG has observed that most deer on the island do not migrate extensive distances seasonally. ADFG considered that the harvest of this area might hinder deer travel from the alpine ridge top to the Vallenar valley during winter conditions for ready access to areas of higher quality browse. The dissected drainages and variable timber size caused by the topography and soils on the hillside offer several locations for accommodating this type of travel and meeting other purposes. After analyzing the habitat above the second growth, ADFG recommends including a travel corridor as a secondary goal of the unit layout in Section 13. The ability of the timber to be wind-firm is important to provide reasonable travel conditions. The DOF will work with ADFG and consider the practicality of placing a travel corridor on the south end of Section 13 during the development of the harvest plan.

The old growth on the west face of California ridge will see limited harvesting and consequently minor change to the habitat. The majority of the change will come in the form of increased human access to the area from the road’s proximity.

The old growth harvest on the west side of the valley will increase available summer forage until the regeneration reaches the stem exclusion stage. The stem exclusion stage will likely be staggered due to the poorer site conditions that tend to yield irregular regeneration vigor and thus provide understory browse opportunity. The DOF will manage some of this exclusion phase by thinning and possibly planting to extend stand closure.

e. Predation:

Hunting and trapping on the island are governed by access which predominately is by boat or the road system connected to the airport. The western side of the island is relatively isolated due to exposure to Clarence Strait and receives little hunting pressure. The more accessible east side of the island has thick scrubby timber that makes hunting difficult and creates dispersed and low value habitat. Deer hunting effort and harvest in this area is currently low.

A notable change in the project area will be in the improved ability of predators (human, wolf, and bear) to access deer in the project area. The availability of deer for predator consumption will likely decrease over time in the area of the timber harvest because of habitat changes. This will also be due to the increased efficiency of access and with it hunting pressure. While this will be relevant to the deer in the immediate area of the harvest units and roads, it will not significantly affect deer, wolf or bears beyond the road system (the access to the majority of the island will not likely change due to the current management perspective of the USFS). The overall deer or wolf population on the island is not projected to significantly diminish in response to this timber sale.

f. Human deer harvest:

Gravina Island is close to Ketchikan and Metlakatla, and is a small geographic portion of the game management unit. The overall quality of the deer habitat on Gravina is a relatively low. This may be the reason for the low capability of the island to produce a resilient population of deer, since it historically does not experience deep snow during winters like other parts of southeast. While deer harvest rates by humans have been higher in the past, they have never been consistently or remarkably high. The deer harvest level on Gravina is important primarily because of its proximity to the Ketchikan population base and the general ease of access on the east side of the island. In contrast the west side of the island is isolated and less hunted. The Vallenar timber sale will not change the access to the west side of the island.

g. Wolves:

Like deer, the wolf population on the island is small compared to the rest of the game management unit and the overall range of the wolf. The Alaska Board of Game in 2012/13 considered removing the wolves from Gravina as an intensive management (IM) action to increase the deer population for human use. This plan has not been implemented because ADFG is gathering baseline data on both wolves and deer to help determine effectiveness of IM

action for this area. In its finding for implementation of IM, ADFG assessed the sustainability of the wolf population in the game management unit and concluded that it was sustainable without the population on Gravina.

h. Overall:

The amount of habitat impacted by the Vallenar sale is small in comparison to the size of the island and its associated habitat. Gravina Island contains approximately 61,404 acres. Of these 39,393 acres is National Forest System lands that are currently in “Roadless” status. The State Forest on the island contains approximately 7,499 acres. The State has harvested approximately 435 acres to date in the Bostwick area in the form of clear-cuts. The State projects it will ultimately log less than 15% of its State Forest land on Gravina. This will amount to less than 2.5% of the total land base on the island harvested by clear-cut methods. The remaining acreage is owned by the Borough, the Alaska Mental Health Trust (AMHLT), the University of Alaska and private parcels. Of these owners the AMHLT is the only land owner that has harvested timber in the past 10 years on the island other than the State. The AMHLT logged 83 acres using clear-cut methods in three separate units; they additionally logged by helicopter, portions of the east side of California Ridge using selective harvesting methods (non merchantable timber was left standing). Typically this amounts to retaining approximately 50% or more of the stems in a given area after helicopter logging.

The ADFG Wildlife Conservation Division is studying the deer carrying capacity of the island relative to other sites in the game management unit and has observed that the island has poor to moderate carrying capacity for wintering deer. It is also estimating the wolf population and characteristics on Gravina to determine the significance it has on the deer population. ADFG is seeking to better understand the reason for the apparent low numbers of deer on the island during the last several decades in order to determine if deer might benefit from intensive management to increase their population.

The access of the lower end of the Vallenar drainage by this project is not anticipated to change the overall wildlife dynamics on the island due to the capacity of the remainder of the island that is in federal ownership and is not readily accessible. The overall down-turn in deer population on the island is atypical and historically viewed by ADFG in light of factors not related to access or timber harvest. While the previous timber harvests on the island have affected deer population in localized manner it is not the cause of the low numbers overall on the island.

i. Bald eagle:

The DOF used available federal information on bald eagle nest locations and field observation during design to locate known and active nest sites. Per 11 AAC95.340 the DOF has and “will maintain where feasible a retained buffer of not less than 330 feet in radius around each bald eagle nesting tree”. Several documented nests were located by the DOF in the course of planning this project well outside of the work area. The location of the road and proposed timber sale units are generally removed from the coastal area and the timber types that are typically used by bald eagles.

4. Fish Habitat, water resources, and water quality: The proposed project will be designed and managed 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) . The ADFG-Habitat has been involved in the documentation and design of the project. All of the project area that has potential for fish habitat was visited by ADFG-Habitat in the summer of 2014.

The majority of the streams on the Vallenar Road alignment are small bedrock-controlled streams and have relatively steep gradients. The proposed Vallenar Access Road crosses cataloged anadromous Stream 101-47-10550, Stream 101-47-10600 and Stream 101-47-10650 above documented habitat. Of these drainages only Stream 101-47-10550 contained evidence of any fish (cutthroat trout) at the crossing location. All of these cataloged streams will be spanned by bridges and do not require any in stream work for construction.

The Vallenar Creek (101-29-10060) drainage is relatively extensive and has many tributaries that were mapped by the DOF in the project area. The Vallenar Creek crossing was identified early in the project as a controlling feature due to its value to the fisheries and wildlife resources. Timber sale activity will not occur within 300 feet of the main Vallenar Creek. The site of the proposed crossing is bedrock controlled and approached on both sides with a minimal amount of earth work. This type of crossing provides inherent stability and low risk to the resource; a full-span bridge is proposed at the sight with no in stream work, the bank will be armored with rip-rap to protect the structure at high flows.

Cataloged tributary Stream 101-29-10060-2001 and a small uncatalogued anadromous tributary to that stream will be the only other fish streams on the project that will be crossed by road. Both of these streams will be completely bridged to avoid habitat.

The DOF has mapped numerous other streams showing evidence of fish that are tributary to Vallenar Creek that flow from the toe of the hillside in Section 13 in a northwesterly manner. All of these steepen and become non-fish bearing waters with intermittent flow below the existing FDR 8110; these streams generally have similar characteristics below their emergence (1-3 feet in width for most of their length, several inches deep and incised). The development of the timber sale units accessed by the FDR 8110 will avoid

these below the road during unit design (100-foot retention area on both sides) per FRPA requirements.

The Vallenar drainage is presently used in a limited manner for freshwater fishing due to the difficulty of access which will improve with this project. The estuary of the drainage is significant in size and scope and has a notable quantity of habitat in proximity to the remote subdivision cabins making it convenient and accessible. The area offers Dungeness crab and salmon fishing.

The operations proposed in this project are limited in direct contact with fish-bearing waters by avoidance in the design. Through the use of FRPA Best Management Practices and ADFG fish habitat permits significant affects on fisheries and water quality will be minimized. FRPA BMPs specifically focus on controlling siltation and erosion as a by-product of road construction and timber harvesting. The DOF in consultation with ADFG-Habitat projects no significant impact on the fishery resources of the area.

5. Recreation, tourism, and scenic resources: The project area is in proximity to the community of Ketchikan and thus exposed to the view of tourists and residents. Indirect observation from boat and aircraft likely does occur as part of other tourism activity. On the Tongass Narrows side of the project the road will be visible from the water and town. Given the existing infrastructure and sparse cover of the hillside this affect will be minimal. No timber harvest is proposed facing town on State Forest or Borough land as part of this project. Where the road approaches Vallenar Bay it will be shadowed by the vegetative cover of the existing State subdivision and have limited if any scenic impact from the water.

The reestablishment of FDR 8110 will likewise have a limited visual change from saltwater given that it is an exiting road and is removed by topography from the bay. The associated timber sale harvest units on the hillside though will change the view shed in the short term. As the forest reestablishes it will look similar to the existing landscape as seen from the water which is predominately “young growth” timber mixed in with the natural landscape disturbance. The harvest areas on the west side of the project area are inter-mixed with muskegs and scrubby timber; the units in this area will initially be visible from saltwater and more so from the air. The majority of the harvest area is shielded from saltwater by the topography and coastal timber. As the harvest units reforest the area will take on less and less differentiation from the remaining timber. The mottled nature of this side of the valley will continue to be reflected in the reforestation pattern.

Recreational fishing, hunting, and berry-picking occurs and will have better access to the area due to the project which may influence the experience in both a positive and negative manner depending on the remoteness of the experience the participant desires.

6. Cultural Resources. DOF works with the State Historic Preservation Office (SHPO) to identify and avoid known cultural, historic or prehistoric sites in planning the proposed access routes and salvage areas. The Alaska Archaeological Survey Unit visited the site in the fall of 2013 and determined that the area of the project specific activity gave no in-

dication that it contained cultural or historic resources. If additional archaeological sites are identified, proposed timber sale areas and road locations will be appropriately adjusted to avoid conflicts. If any historic or archaeological sites are encountered during road construction or harvest activities, DOF will immediately inform SHPO and take action to protect the findings.

7. Subsurface Resources: There is no known current mining activity in the immediate area. Other than sharing some of the same access roads, this sale should have no impact on the potential mining resources of the area.

G. Costs and benefits:

The Vallenar management area is physically removed from the existing Gravina road system and the log transfer facility at Lewis Reef due to other ownerships and significant topography. The majority of the State Forest land base in southeast Alaska is likewise remote. The Vallenar tract is relatively close to the community of Ketchikan and offers long term forest resource values closer to a regional hub. The State Legislature with this perspective in mind made \$5,000,000 through the ADOT (Roads to Resources Program) available to DOF for connecting the existing Gravina Island road system to public land in the Vallenar Bay area. The significant upfront cost and complexity of acquiring access contributed to the project plan of constructing the road as a public works project using the ADOT Roads to Resources funding prior to the sale of the timber. By taking this approach, added flexibility will be gained configuring the timber sales. The timber once accessed will be available in a shorter period of time to match the market need; significant risks will have been minimized or eliminated from a timber purchaser's perspective. This will in turn theoretically yield a higher residual appraisal value of the timber. The DOF estimates the cost of access to be close to the overall value of the timber described as operable in the area. The FLUP prescription and markets will influence the actual return. The long-term benefits to the State include subsequent timber harvest rotations and other forest resources available to the public with improved access.

Based on Borough Planning Department documents, the Vallenar Road in general is expected to see other incidental use by the community in addition to accessing the State Forest because of its proximity to adjacent ownerships and the community of Ketchikan. Future use of the Borough land adjacent to the project is not permitted, funded, or scheduled at this time. The use of the adjacent private land is outside the scope of this project.

Timber sales have typically created economic benefits to the communities of Southeast Alaska. The business communities will receive direct economic benefits by providing support services for the operators such as fuel, food, housing, medical and miscellaneous supplies. The residents of the communities in Southeast Alaska will receive a direct benefit through employment opportunities and wages paid by the operator during the course of the timber harvest and potentially also during milling operations.

The timber identified for harvest in the project area has been marketable in the economic conditions observed in the region for the past decade. The DOF has been able to sell all of the timber it has marketed in the past twenty years in Southeast Alaska. The ready access to the infrastructure of Ketchikan aids in this project outlook since the community is the hub for timber operations that occur much farther afield and are more costly to operate. The timber from this project fits a variety of markets both export and domestic. The lack of diversification of the remaining mills in the region, combined with lumber prices have led to timber being processed within the region as well as sold in the round to global markets. Currently the smaller diameter timber regardless of age class or quality is exported in the round.

Some efforts have been made to establish wood waste as an energy source in several areas of the state including Ketchikan. Given the project's proximity to Ketchikan this may be a benefit and allow greater utilization (tops, cutoffs, etc.) of the resource in the community. This would likely take the form of cordwood with the possibility contributing to a processed feedstock such as chips or pellets given the existing demand of several public buildings and private households in the area for pellets.

The Vallenar Road will remain open to vehicle traffic to facilitate overall management of the Vallenar area. Most of the road in the Vallenar drainage (FDR 8110 and the 3000 Road) will be closed upon completion of harvest to highway vehicle traffic to limit the long term maintenance costs. The cost to maintain the proposed Vallenar Road will be covered by timber sale revenue, fees and other mechanisms commensurate with its documented use. Post timber sale activity, the maintenance of the road projected to be left open is estimated at \$2,000/mile/year.

VI. PUBLIC NOTICE

The PBIF was publicly noticed in compliance with AS 38.05.945. Notice was posted on the Alaska Online Public Notice System on 2/2/2015, the Ketchikan and Craig Public Libraries, the Post Offices located in Ketchikan, Ward Cove, Metlakatla and Craig. A legal notice was also provided in the Ketchikan Daily News on 2/04/2015 and 2/11/2015. Notice of the PBIF was also mailed to those individuals and organizations that have voiced an interest in this and similar projects in the vicinity. The DOF also did a press release which in combination with the other notification methods precipitated a front page article in the Ketchikan Daily news regarding the project on 2/06/2015.

VII. PUBLIC COMMENT AND RESPONSE

DOF received comments from five organizations and six individuals as well as agency input. The DOF categorized the comment topics and replied in Appendix E of the BIF. Comments ranged from general support or opposition to specific questions on access, administrative standards, economics, FRPA, utilization and fish and wildlife. The DOF response to wildlife questions led to a more in depth description of existing conditions and the project's management intent in the BIF wildlife section with regard to deer habitat.

VIII. ALTERNATIVES DISCUSSION

Three possible alternatives were considered for this project area. A discussion of each alternative follows. All alternatives are consistent with the area plan and applicable statutes and regulations. Two alternatives are action oriented with the third alternative being a no action option.

A. Connect the Vallenar management block via FDR 8110 and new construction to the Bostwick Road located to the south. It entails building approximately two miles of new road on federal land and reconditioning one mile of FDR 8110 on federal land and two miles of the FDR 8110 located on State Forest land. In addition, the Bostwick Road would be upgraded as well as constructing two miles of new road construction on State Forest land in the Vallenar area. The GIIC log transfer facility would be used for this alternative. Compared to Alternative B, this alternative would conceptually require the maintenance of more roads in support of long term access to the Vallenar block. The amount of timber capable of being offered for sale would be essentially the same with minor amounts not as easily accessed near the ASLS 84-85 on the north end of the project area. Historical and cultural impacts are indicated to be the same. Fisheries issues would yield another four additional anadromous stream crossings. The impact to wildlife appears to be greatest of the three alternatives due to the location of the road in the center of the island and thus facilitating higher access by the public to habitat. The site-specific infrastructure to maintain over time in the form of bridges is roughly the same in both action alternatives. The overall length of the road to be constructed and reconstructed is two miles less than Alternative B.

Based on scoping discussions with the USFS (3/13/2014) it would require a NEPA process to authorize access to State land through USFS land. The NEPA process and the federal government's desired shift towards Roadless management make this a lower ranked alternative for the State given the amount of time and funds available. The management of the NEPA process would be a federally-driven decision with reduced State control of the project timing and requirements. Given the projected near- and long-term need for local timber, the schedule does not fit the objectives of the State.

B. Connect to the GIIC as described in this BIF document. The willingness of the Borough to grant an easement made this a functional alternative. The proposed project as outlined in this document is consistent with the Five-Year Schedule of Timber Sales, contributes to DNR's constitutional mandate, provides long term access to the State Forest, is projected to provide royalties to the State, meets the silviculture objective of improving forest vigor, and creates additional jobs in Southeast Alaska due to the combination of road building, logging, trucking, and milling.

C. No action. The "no action alternative" does not meet one of the prime objectives of DNR to encourage the development of the state's renewable resources, making them available for maximum use consistent with the public interest, sustain and promote a healthy, long term use of forest resources in the state, proving a secure source of timber for local use while protecting other resources such as fish and wildlife.

IX. FINAL FINDING AND DECISION

After due consideration of all pertinent information and alternatives as described in Section VIII, the DNR has reached the following decision: To offer for sale approximately 600 acres of mixed age timber to provide sawtimber and fuelwood as proposed in Alternative B and described in this BIF. Public notice has been accomplished in accordance with AS 38.05.945. The case file has been found to be complete and the requirements of all applicable statutes have been satisfied. The DOF finds that this preliminary 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 of AS 38.05.035(e) (Powers and Duties of the Director) , AS 38.05.110-120, AS 41.17 (Alaska Forest Resources and Practices) ; 11 AAC 71 (Timber Sale Statutes and Regulations).

X. SIGNATURE

Signature on file

May 4, 2015

John C. Maisch
State Forester
Alaska Division of Forestry

Date

XI. APPEALS

A person affected by this decision who provided timely written comment or public hearing testimony on this decision may appeal it, in accordance with 11 AAC 02. Any appeal must be received by **May 27, 2015** and may be mailed or delivered to Mark Meyers, Commissioner, Department of Natural Resources, 550 W. 7th Avenue, Suite 1400, Anchorage, Alaska 99501; faxed to 1-907-269-8918, or sent by electronic mail to: dnr.appeals@alaska.gov. If no appeal is filed by that date, this decision goes into effect as a final order and decision on **May 27, 2015**. An eligible person must first appeal this decision in accordance with 11 AAC 02 before appealing this decision to Superior Court. A copy of 11 AAC 02 is enclosed.

If you have any questions, please contact Greg Staunton via: dnr.vallenar.bay@alaska.gov or at: (907) 225-3070.

XII. APPENDICES

Appendix A	See Attachment A	Vicinity Map
Appendix B	See Attachment B	Project Maps Pages 1-4
Appendix C	References	
Appendix D	Appeal Regulations	
Appendix E	Public and Agency Comments and Responses	

Appendix C References

Alaska Department of Fish and Game, Division of Wildlife Conservation, *Feasibility Assessment For Maintaining Or Increasing Sustainable Harvest Of Sitka Black-Tailed Deer In A Portion Of Game Management Unit 1a*, October, 2012. Retrieval from:

<http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.unit1a#anchor>

Alaska Department of Fish and Game, Division of Wildlife Conservation, *Operational Plan for Intensive Management of Sitka Black-tailed deer in a Portion of Game Management Unit 1A*, March 6, 2013, Retrieval from:

<http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.unit1a#anchor>

Alaska Department of Natural Resources, Division of Forestry and Ketchikan Gateway Borough Manager, Gravina Island Industrial Complex Agreement, February 20, 2014.

Alaska Department of Natural Resources, Division of Forestry, Annual Board and Agency Reports on the effectiveness of the Alaska Forest Practices Act and regulations. Reports retrieval from:

<http://forestry.alaska.gov/alaskaboardforestry.htm>

Alaska Department of Natural Resources, Division of Forestry, Bostwick Timber Sale #1 file. 2004- Present.

Alaska Department of Natural Resources, Division of Forestry, *Southeast State Forest Management Plan*, Agency Draft issued August 2014. Maps and general information retrieval from:

<http://forestry.alaska.gov/stateforests.htm>

Alaska Department of Natural Resources, Division of Forestry, Southern Southeast Area Office, *Five-year Schedule of Timber Sales*, July 2013. Retrieval from:

<http://forestry.alaska.gov/timber/ketchikan.htm#fiveyear>

Alaska Department of Natural Resources, Division of Mining Land and Water, *Central Southern Southeast Area Plan*, Adopted: November 2000. Retrieval from:

http://dnr.alaska.gov/mlw/planning/areaplans/cs_southeast/

British Columbia Ministry of Forests, Forest Practices Branch, *Introduction to Silvicultural Systems*. Web site accessed at:

<http://www.for.gov.bc.ca/hfd/pubs/SSIntroworkbook/evenage.htm#patch>

Code Publishing Inc., Ketchikan Gateway Code. Retrieved from:

<http://www.codepublishing.com/AK/ketchikangatewayborough/>. December 15, 2014.

Coughlin, Cindy, GCI Network Services, Site Acquisition and Real Estate. Personal communication December 2014.

Depew, Alan D., Alaska Archaeological Survey Unit, Office of History and Archaeology
Alaska Department of Natural Resources. Cultural Resource Investigations Associated with State
Division of Forestry Roads to Resources Projects and Timber Sales on Gravina and Kosciusko
Islands, Southeast Alaska, January, 2014.

Defreest, Jeffrey, District Ranger, Ketchikan-Misty Fiords Ranger District. Personal communication March 13, 2013.

Harney, Richard, Principal Planner, Ketchikan Gateway Borough, Department of Planning and
Community Development. Personal communications 2013-2014.

Ketchikan Gateway Borough, *Assembly Resolution # 2544, Conveyance of Right of Way to
ADNR*, June 16, 2014.

Ketchikan Gateway Borough, Department of Planning and Community Development, *Comprehensive Plan 2020*, April 2009. Retrieval from:
<http://www.borough.ketchikan.ak.us/216/Comprehensive-Plan>

Ketchikan Gateway Borough and Niblack Project LLC, *Memorandum of Understanding Regarding the Gravina Island Industrial Complex*, August 8, 2012.

Ketchikan Gateway Borough, Department of Planning and Community Development, *Gravina Island Plan/Central Gravina and Airport Reserve Area*, 2005.

Ketchikan Gateway Borough, Department of Planning and Community Development, *Gravina Island Plan/ North Gravina Area*, 2005.

Ketchikan Gateway Borough Geographic Information System. Retrieved from:
<http://www.borough.ketchikan.ak.us/196/GIS-Maps>

Kilanowski, Jerry, University of Alaska Land Management. Personal communication, October 2014.

Minnillo, Mark, Area Habitat Biologist, Alaska Department of Fish and Wildlife, Division of Habitat, personal communication and field notes 2013-2015.

Porter, Boyd, Area Wildlife Biologist, Alaska Department of Fish and Wildlife, Division of Wildlife, personal communication 2013-2015.

Staunton, Gregory, Project Manager, Gravina Field Report, Alaska Department of Natural Resources, Division of Forestry, December 12, 2012.

United States Forest Service, Region 10, Engineering Cost Guide. February 24, 2014.

United States Forest Service Geographic Information System Database 2010.

United States Forest Service. E.I.S. and Record of Decision for the Gravina Island Timber Sale. July 23, 2004.

Wikipedia. Shovel logging. Accessed at: http://en.wikipedia.org/wiki/Shovel_logging

APPENDIX D. 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.

TITLE 11. NATURAL RESOURCES.

CHAPTER 02. APPEALS.

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. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:

AS 03.05.010	AS 38.05.020	AS 38.50.160	AS 44.37.011
AS 29.65.050	AS 38.05.035	AS 41.15.020	AS 46.15.020
AS 29.65.120	AS 38.08.110	AS 41.17.055	AS 46.17.030
AS 38.04.900	AS 38.09.110	AS 41.21.020	

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. (Eff. 9/19/2001, Register 159; am 12/27/2012, Register 204)
(Eff. 9/19/2001, Register 159; am 12/27/2012, Register 204)

Authority:

AS 29.65.050	AS 38.04.900	AS 38.05.035	AS 38.09.110
AS 29.65.120	AS 38.05.020	AS 38.08.110	AS 38.50.160

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. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:

AS 03.05.010	AS 44.37.011	AS 38.05.035	AS 41.21.020
AS 38.04.900	AS 29.65.050	AS 38.09.110	AS 46.15.020
AS 38.08.110	AS 29.65.120	AS 38.50.160	AS 46.17.030
AS 41.15.020	AS 38.05.020	AS 41.17.055	

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, fax, 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; and

(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.

(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 requirement 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 who believes a stay of the decision is justified 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. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:

AS 03.05.010	AS 38.05.020	AS 38.50.160	AS 44.37.011
AS 29.65.050	AS 38.05.035	AS 41.15.020	AS 46.15.020
AS 29.65.120	AS 38.08.110	AS 41.17.055	AS 46.17.030
AS 38.04.900	AS 38.09.110	AS 41.21.020	

Editor's note: The address for an appeal or request for reconsideration by personal service and by mail is: Department of Natural Resources, Commissioner's Office, 550 W. 7th Avenue, Suite 1400, Anchorage, Alaska 99501-3561. The number for an appeal or request for reconsideration by fax is: 1-907-269-8918. The electronic mailing address for an appeal or request for reconsideration by electronic mail is: dnr.appeals@alaska.gov .

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). (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:

AS 03.05.010	AS 38.05.020	AS 38.50.160	AS 44.37.011
AS 29.65.050	AS 38.05.035	AS 41.15.020	AS 46.15.020
AS 29.65.120	AS 38.08.110	AS 41.17.055	AS 46.17.030
AS 38.04.900	AS 38.09.110	AS 41.21.020	

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. (Eff. 11/7/90, Register 116)

Authority:

AS 03.05.010	AS 38.05.020	AS 41.15.020	AS 46.17.030
AS 29.65.050	AS 38.08.110	AS 41.17.055	
AS 29.65.120	AS 38.09.110	AS 41.21.020	
AS 38.04.900	AS 38.50.160	AS 46.15.020	

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. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:

AS 03.05.010	AS 38.05.020	AS 38.50.160	AS 46.15.020
AS 29.65.050	AS 38.05.035	AS 41.15.020	AS 46.17.030
AS 29.65.120	AS 38.08.110	AS 41.17.055	
AS 38.04.900	AS 38.09.110	AS 41.21.020	

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. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)

Authority:

AS 03.05.010	AS 41.21.020	AS 38.05.020	AS 41.17.055
AS 29.65.120	AS 03.10.020	AS 38.08.110	AS 46.15.020
AS 38.05.035	AS 29.65.050	AS 38.09.110	AS 46.17.030
AS 38.50.160	AS 38.04.900	AS 41.15.020	

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. (Eff. 11/7/90, Register 116; am 9/19/2001, Register 159)


Authority:

AS 03.05.010	AS 38.05.020	AS 38.50.160	AS 44.37.011
AS 29.65.050	AS 38.05.035	AS 41.15.020	AS 44.62.540
AS 29.65.120	AS 38.08.110	AS 41.17.055	AS 46.15.020
AS 38.04.900	AS 38.09.110	AS 41.21.020	AS 46.17.030

IX. FINAL FINDING AND DECISION

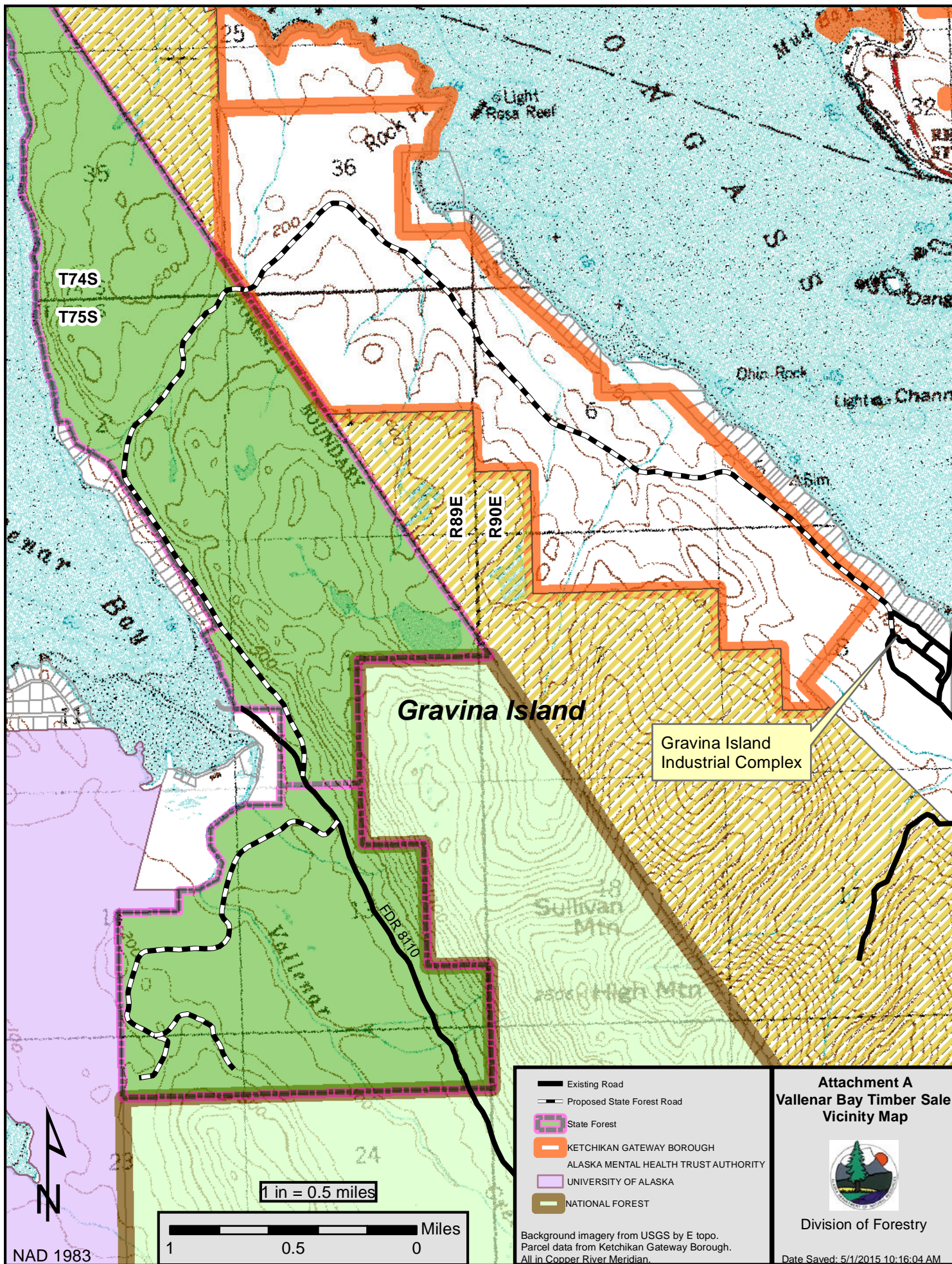
After due consideration of all pertinent information and alternatives as described in Section VIII, the DNR has reached the following decision: To offer for sale approximately 600 acres of mixed age timber to provide sawtimber and fuelwood as proposed in Alternative B and described in this BIF. Public notice has been accomplished in accordance with AS 38.05.945. The case file has been found to be complete and the requirements of all applicable statutes have been satisfied. The DOF finds that this preliminary 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 of AS 38.05.035(e) (Powers and Duties of the Director) , AS 38.05.110-120, AS 41.17 (Alaska Forest Resources and Practices) ; 11 AAC 71 (Timber Sale Statutes and Regulations).

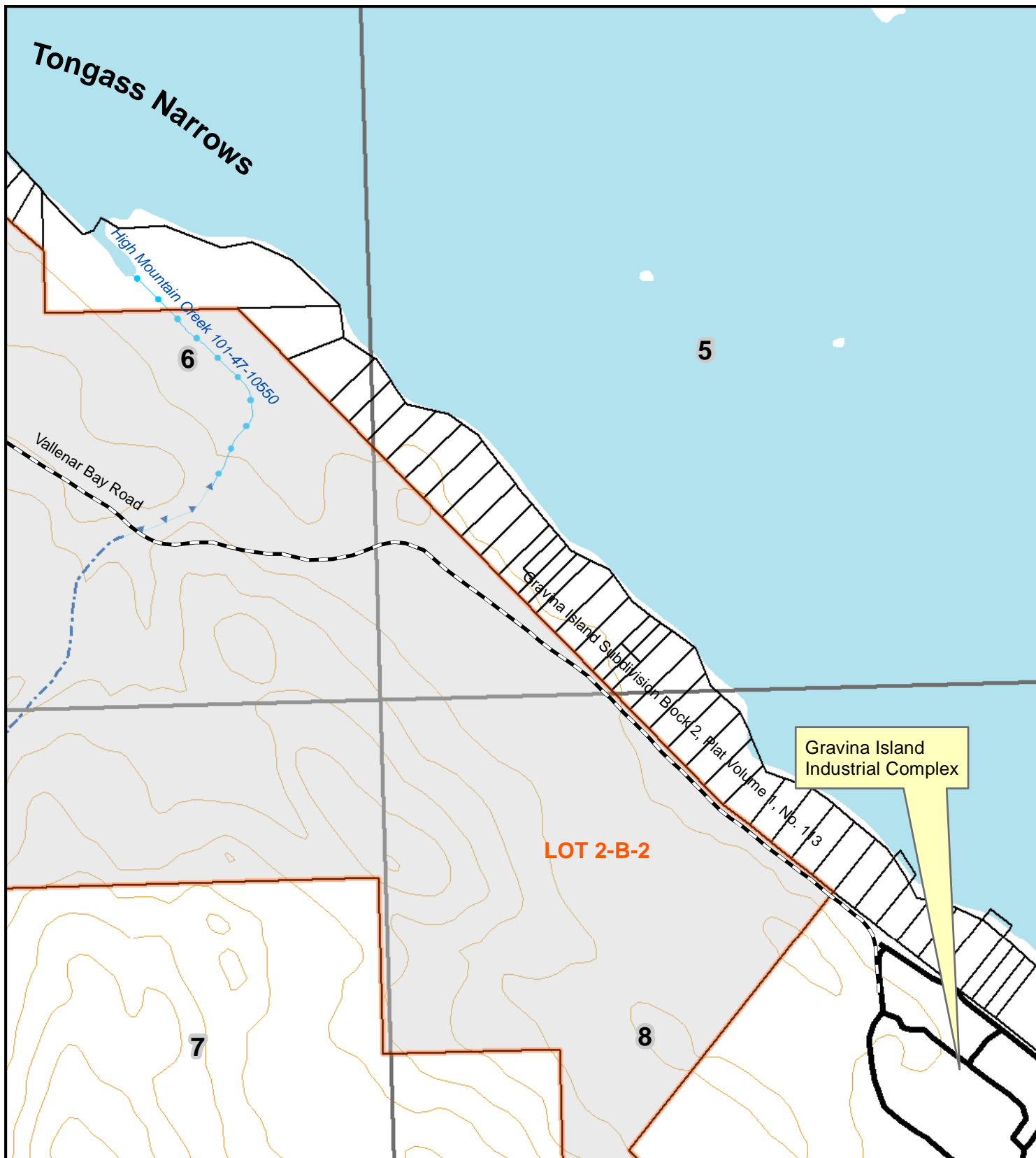
X. SIGNATURE




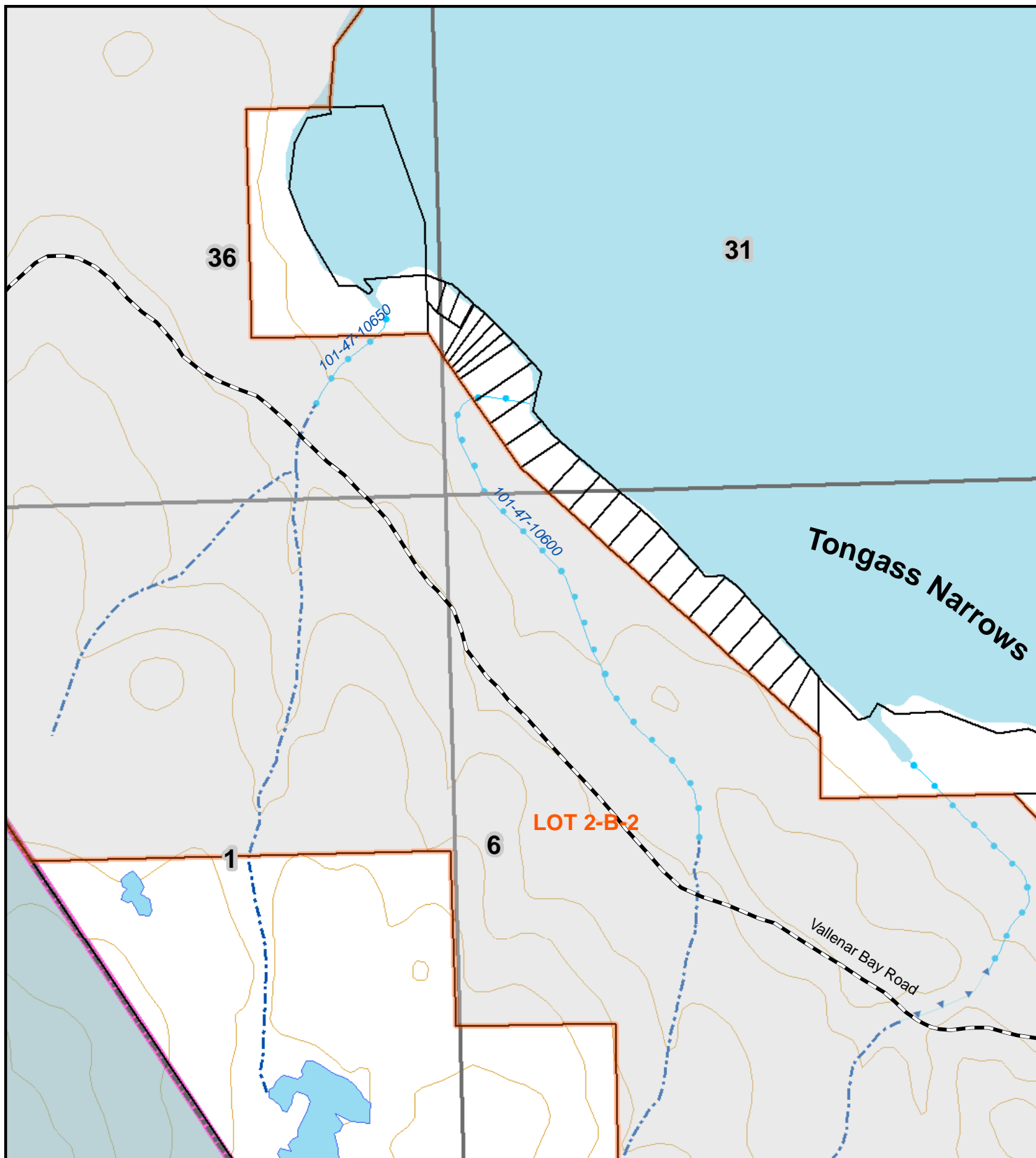
John C. Maisch
State Forester
Alaska Division of Forestry

5/4/15
Date





<p>Scale: 1,000 500 0 Feet 1 in equals 1,000 feet</p> <p>Contour Interval: 100 Feet</p> <p>Background Data Source: USFS GIS Library May, 2010</p> <p>Parcel Boundary Source: 2014 Ketchikan Gateway Borough</p> <p>NAD 1983</p>	<table border="0"> <tr> <td> <ul style="list-style-type: none"> Proposed State Forest Road Existing Road Operable Timber Base KETCHIKAN GATEWAY BOROUGH UNIVERSITY OF ALASKA NATIONAL FOREST STATE FOREST </td> <td> <ul style="list-style-type: none"> Cataloged Anadromous Uncataloged Anadromous Resident Fish Water Quality Eagle Trees </td> </tr> </table> <p>This map set depicts the proposed Vallenar Bay Project located on Gravina Island in Township 74 and 75 South, Range 89 and 90 East, Copper River Meridian.</p>	<ul style="list-style-type: none"> Proposed State Forest Road Existing Road Operable Timber Base KETCHIKAN GATEWAY BOROUGH UNIVERSITY OF ALASKA NATIONAL FOREST STATE FOREST 	<ul style="list-style-type: none"> Cataloged Anadromous Uncataloged Anadromous Resident Fish Water Quality Eagle Trees 	<p>Attachment B Vallenar Bay Timber Sale Map Page 1 of 5</p>  <p>Division of Forestry Date Saved: 5/1/2015 9:46:54 AM</p>
<ul style="list-style-type: none"> Proposed State Forest Road Existing Road Operable Timber Base KETCHIKAN GATEWAY BOROUGH UNIVERSITY OF ALASKA NATIONAL FOREST STATE FOREST 	<ul style="list-style-type: none"> Cataloged Anadromous Uncataloged Anadromous Resident Fish Water Quality Eagle Trees 			



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Contour Interval 100 Feet

Background Data Source:
 USFS GIS Library May, 2010

Parcel Boundary Source:
 2014 Ketchikan Gateway Borough

- Proposed State Forest Road
- Existing Road
- Operable Timber Base
- KETCHIKAN GATEWAY BOROUGH
- UNIVERSITY OF ALASKA
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- STATE FOREST

- Cataloged Anadromous
- Uncataloged Anadromous
- Resident Fish
- Water Quality
- Eagle Trees

This map set depicts the proposed Vallenar Bay Project
 located on Gravina Island in Township 74 and 75 South,
 Range 89 and 90 East, Copper River Meridian.

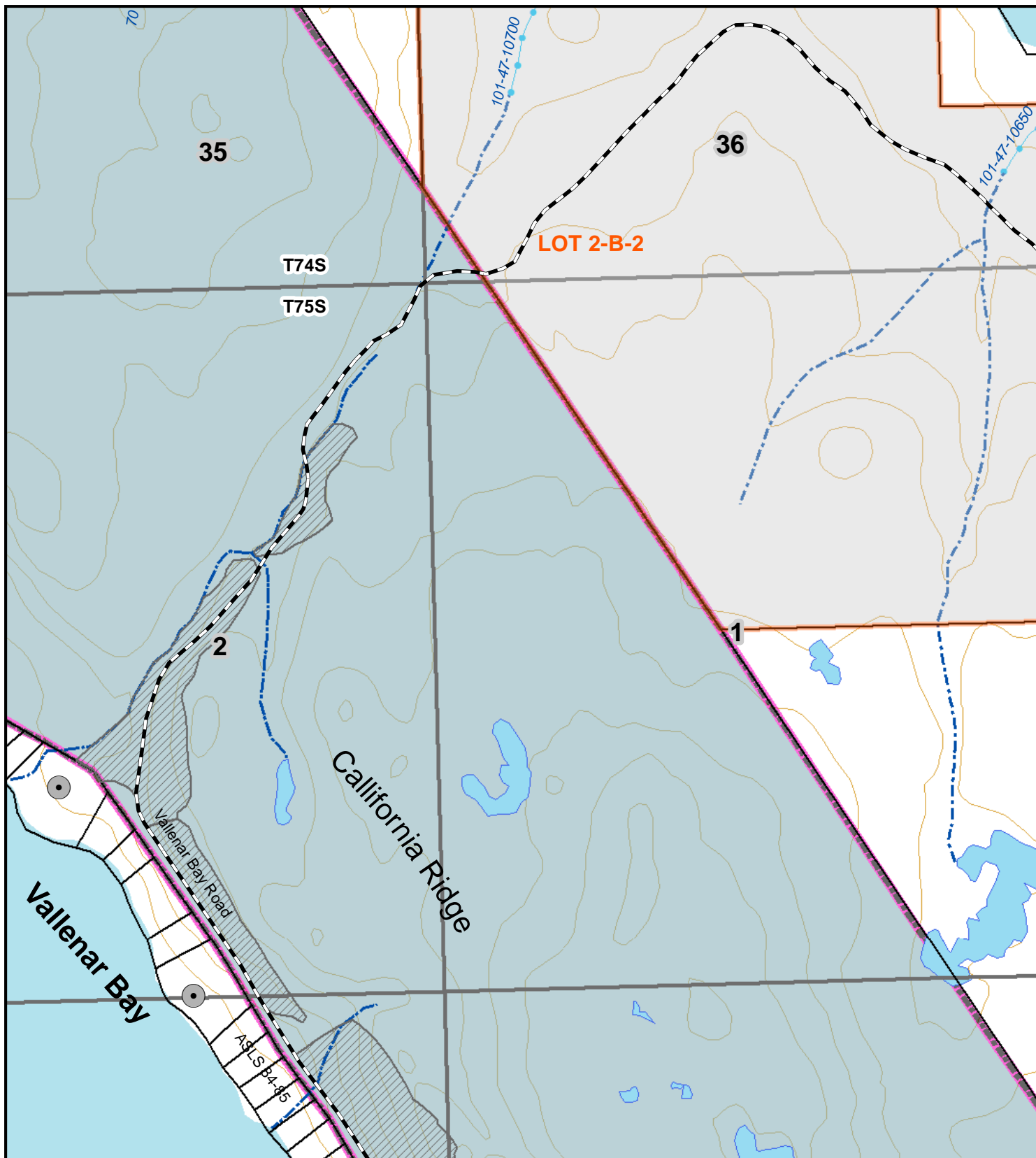
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Vallenar Bay Timber Sale
Map
Page 2 of 5



Division of Forestry

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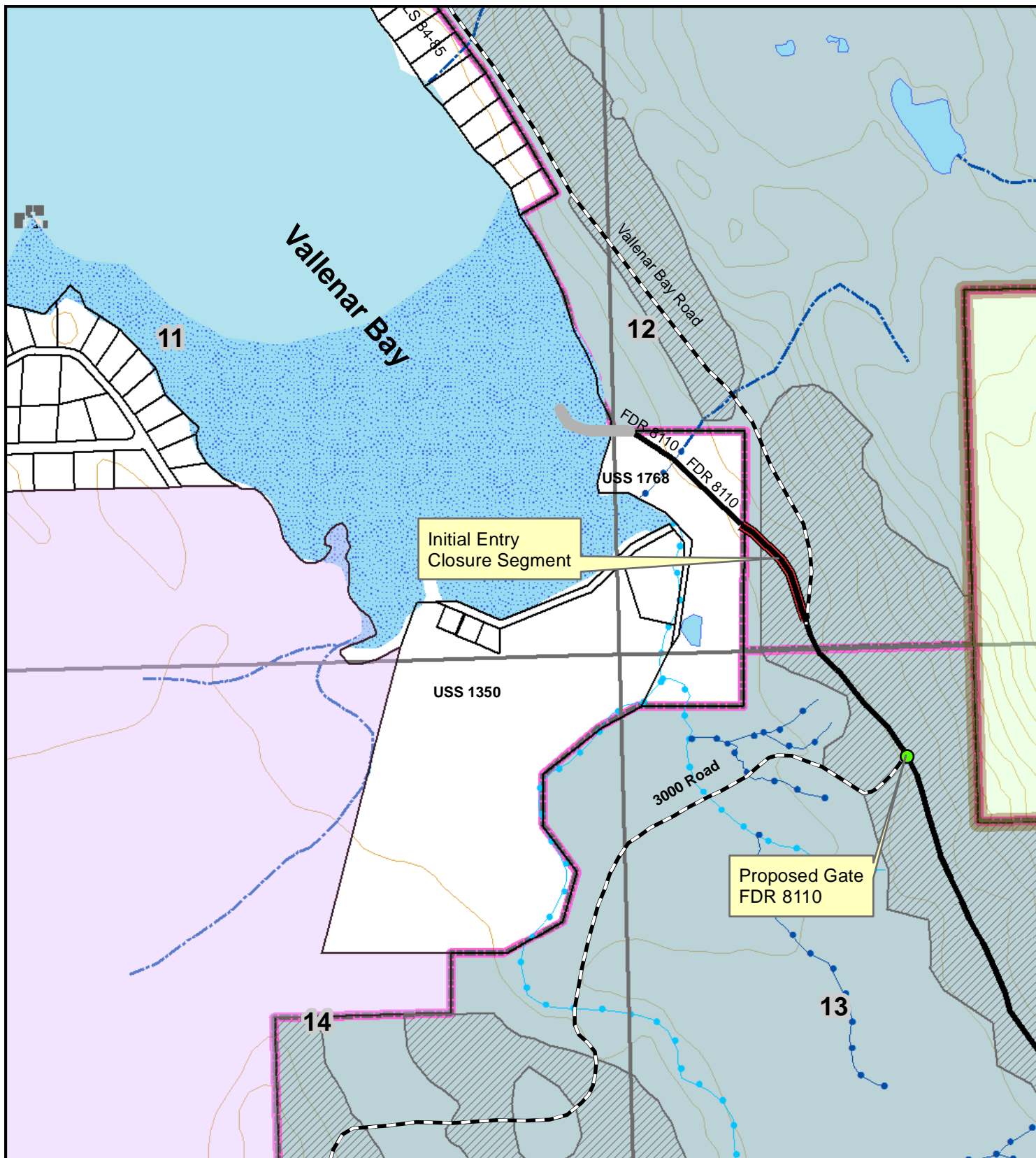
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Page 3 of 5



Division of Forestry

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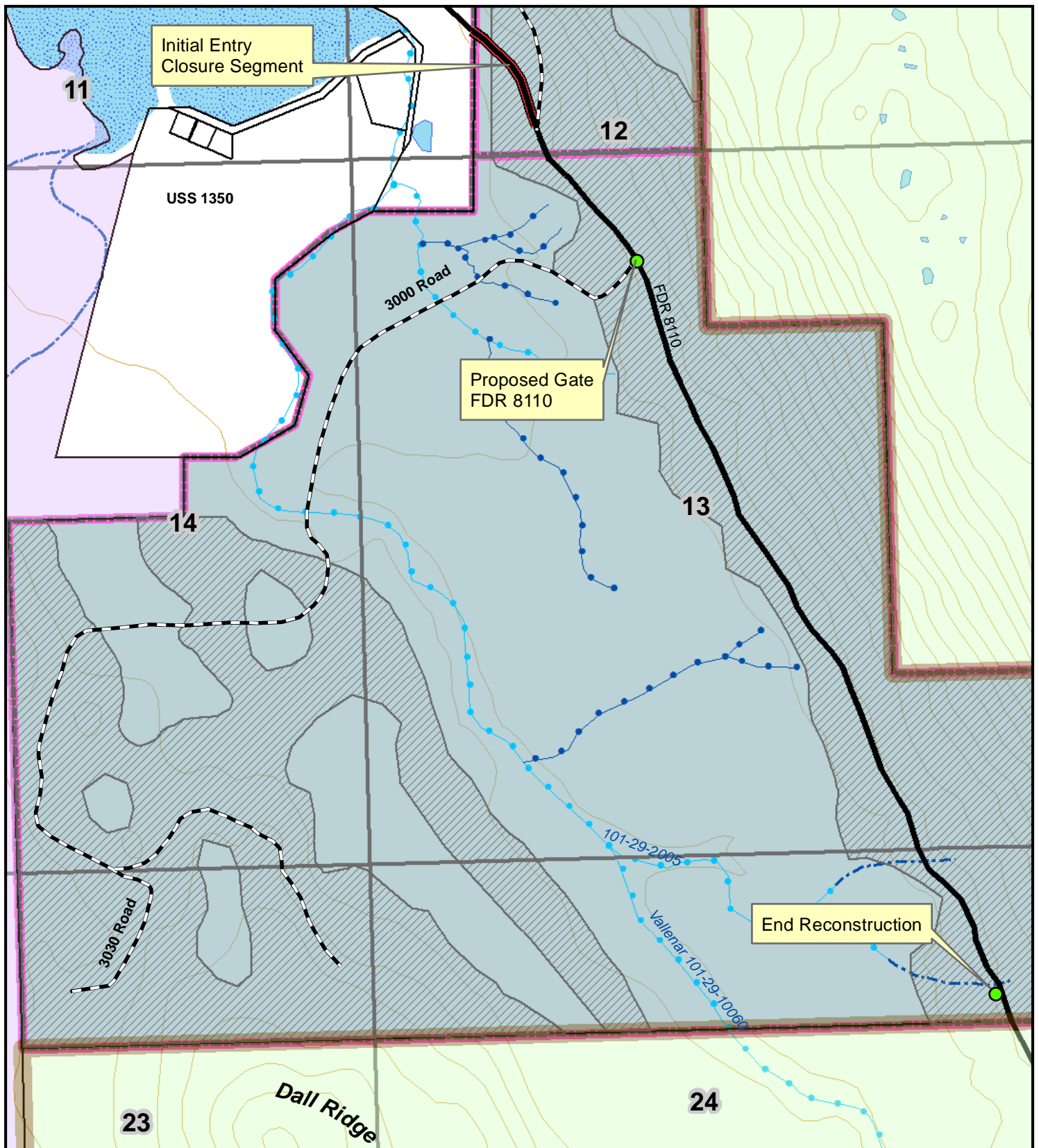
Attachment B
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Map
Page 4 of 5




Division of Forestry

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<p>Scale: 1,000 500 0 Feet 1 in equals 1,000 feet</p> <p>Contour Interval: 100 Feet</p> <p>Background Data Source: USFS GIS Library May, 2010</p> <p>Parcel Boundary Source: 2014 Ketchikan Gateway Borough</p> <p>NAD 1983</p>	<table border="0"> <tr> <td> <ul style="list-style-type: none"> Proposed State Forest Road Existing Road Operable Timber Base KETCHIKAN GATEWAY BOROUGH UNIVERSITY OF ALASKA NATIONAL FOREST STATE FOREST </td> <td> <ul style="list-style-type: none"> Cataloged Anadromous Uncataloged Anadromous Resident Fish Water Quality Eagle Trees </td> </tr> </table> <p>This map set depicts the proposed Vallenar Bay Project located on Gravina Island in Township 74 and 75 South, Range 89 and 90 East, Copper River Meridian.</p>	<ul style="list-style-type: none"> Proposed State Forest Road Existing Road Operable Timber Base KETCHIKAN GATEWAY BOROUGH UNIVERSITY OF ALASKA NATIONAL FOREST STATE FOREST 	<ul style="list-style-type: none"> Cataloged Anadromous Uncataloged Anadromous Resident Fish Water Quality Eagle Trees 	<p>Attachment B Vallenar Bay Timber Sale Map Page 5 of 5</p>  <p>Division of Forestry Date Saved: 5/1/2015 9:46:54 AM</p>
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DEPARTMENT OF NATURAL RESOURCES

Comments Received from the Public
on the
Vallenar Bay Timber Sale
Preliminary Best Interest Finding

Spring 2015

Appendix E
Public and Agency Comments and Responses

Abbreviated Name	Commenter - Full Name and Affiliation	Date Received
Mainardi	Joseph A. Mainardi	2/07/2015
SHPO	Mckenzie S. Johnson Archaeologist I, Review and Compliance Alaska State Historic Preservation Office/Office of History and Archaeology	2/12/2015
TCS	Victoria McDonald, President Tongass Conservation Society	3/3/2015
Walker Pryor	Walker Pryor	3/4/2015
John & Angela Pool	John & Angela Pool	3/4/2015
Chamber	Chelsea J. Goucher Executive Director Greater Ketchikan Chamber of Commerce	3/4/2015
SAF	Brock Martin Society of American Foresters	3/5/2015
KGB	Dan Bockhorst Borough Manager Ketchikan Gateway Borough through Chris French Chief Planner	3/5/2015
Sallee/ Walsh	Mike Sallee Susan Walsh	3/5/2015

Abbreviated Name	Commenter - Full Name and Affiliation	Date Received
Greenpeace Group	Greenpeace, Greater Southeast Alaska Conservation Community, Cascadia Wildlands Project, Center for Biological Diversity, The Boat Company	3/5/2015
Palkovic	Pat Palkovic	3/05/2015
Borer	Mr. and Mrs. Borer	3/04/2015 delayed.
ADEC	Kevin J. Hanley Division of Water ADEC	3/25/2015
ADFG	Mark Minnillo Division of Habitat ADFG	3/4/2015

Category	Commenter	Date	Comment	DOF Reply
Access	Palkovic	3/5/2015	Will the property owners be allowed to park their vehicles in the turnouts? Long term?	Per 11 AAC 96.020 generally allowed uses on State land, adjacent land owners will be allowed to use State Forest Land for general access of their property. Parking or storing vehicles or staging material on State land for less than two weeks will be allowed as long as it does not interfere with public access, other public use or interests and does not continue for more than 14 consecutive days. Parking within turn outs in a manner that restricts use during active logging operations would be an example of interference with the public interest (safety).
Access	Palkovic	3/5/2015	Assuming the road stays open to vehicle traffic and since it is State Forest land between the road and subdivision, will the property owners be allowed to construct driveways/access roads to their property?	The Vallenar Bay Road will be maintained by the DOF based on the need of the road for forest management and commensurate available funding. In the event that DOF funding is not available, other users may maintain the road through a formal road use agreement with the DOF, or DOF will close the road per 11 AAC 95.320. Long term access agreements across State Forest land will be contingent on the prerogative of the State to close the road in compliance with

Category	Commenter	Date	Comment	DOF Reply
				<p>FRPA standards to protect the State's best interest. Road closure will be publically notified per a Forest Land Use Plan (AS 38.05.945) prior to closure.</p> <p>Driveways that meet the ADOT driveway standard or access road standards will be considered on a case by case basis as to whether they are in the State's best interest.</p>
Access	Palkovic	3/5/2015	In the areas where the road is within the 100' KGB retention area behind ASLS 84-85, please locate the turnouts on the uphill side of the road away from the subdivision.	The DOF will manage the location of the turnouts during construction. Turnouts and the location of the road will be constructed in the retention area with the perspective of minimizing the disturbance of the area between the subdivision and the road. Other key factors that will govern the road design will be proper drainage around the road as well as basic traffic safety requirements. Turnouts facilitate a significant element of traffic safety on a single lane road.
Access	Borer	3/4/2015	My wife and I own parcel #18, 19 and 20 in block 6 in Vallenar Bay. We would like to know what the long term plans for this road are. Our properties are up against a steep hillside, we would assume these areas will be looked at as to how	<p>Please note the previous response under the topic of access for information on the long term plans for the road and its maintenance.</p> <p>The PBIF outlines initial management concepts and associated risks for the hillside above your lot. Further planning</p>

Category	Commenter	Date	Comment	DOF Reply
			they are logged. Having this road would help in developing our property's. We have had a cabin on lot 18 since 2005 and have always enjoyed our time as a family over there. We were there last week and checked out the proposed flagged road. We are happy to see the progress. We look forward to this road going in.	remains to be done; plans will be publicly documented in the FLUP(s) and through the Borough zoning process.
Access	John & Angela Pool	3/4/2015	Section I, Subsection 3 refers to the benefits to local economy. I would like to add that this project would also aid Vallenar Bay property owner in access and development to their properties. That being said, will property owners be able to benefit from the road during and or after the timber sale? Will the road be maintained and by whom?	The road is being constructed for access to State Forest Land. Incidental use of the road during or after the timber sale(s) will not be restricted unless the safety of the public, property, or the resources of the State are deemed to be at risk. Please see other responses on the subject of access.
Access	Sallee/ Walsh	3/5/2015	I could not find in the PBIF a total mileage of road or number of bridges needed for this project. It appears there will be at least a dozen miles of road construction to access only 600 acres of harvestable timber?	The mileage of road and the drainage structures will be defined in the Forest Land Use Plan. The project as defined in the PBIF consists approximately of the Vallenar Bay Road (6.3 miles), the 3000 Road and spur (1.2 miles) and the reconstruction of the 8110 Road (0.9 miles) on State Forest land.

Category	Commenter	Date	Comment	DOF Reply
Access	Sallee/ Walsh	3/5/2015	Sounds like there are ulterior motives to this road construction, not least of which is an effort to expand the Ketchikan Borough's roaded footprint. Makes one wonder if some speculating landowners in Vallenar Bay have friends in high places. Since we haven't defined funding sources for future maintenance (p10) I'm left to presume the Ketchikan Borough plans to raise property taxes to keep this road open.	The basis of the decision is described in the BIF.
Carbon Storage	Sallee/ Walsh	3/05/2015	Clearcutting could hardly be considered carbon storage, nor could cutting trees down to produce biofuels. Furthermore, recent revelations concerning global climate suggest that carbon stored in old growth forests should be kept stored in those forests.	Carbon storage was not used as a basis for the Best Interest Finding of the State.
Carbon Storage	TCS	3/3/2015	Ofttimes people see a clear cut and think that in 50 or 60 years, it will regrow and timber can be harvested repeatedly. Little do they understand the dynamics of our old-growth rainforest that takes up to 200-300 years or more for full restoration to old-growth status. Big trees hold a substantial amount of carbon, the	See previous reply.

Category	Commenter	Date	Comment	DOF Reply
			overabundance of which threatens the current health of our world. Yet old-growth is given little consideration when compared to a timber sale that promises jobs and economic benefits. The State of Alaska is trading short term gains for the long term benefits of clean air and water and an untrammelled wilderness.	
Economics	Greenpeace	3/5/2015	I. A. "Revenue will not overcome the cost of the road; and with the State budget in crisis, the intended expenditures need to be devoted to essential services." "From a fiscal standpoint, the finding on this must be based on the current budgetary and long-range fiscal crisis that State of Alaska is facing."	<p>The Legislature specifically appropriated funding to establish access to State and other public land in Vallenar Bay. The funding decision for the Vallenar Road construction is independent of the stumpage income to the State from the timber sales that are projected to use the road in the PBIF. There are benefits to the State besides stumpage value as described in the PBIF. From the DOF's perspective this takes the form of increased flexibility and responsiveness to market conditions, long term access to state forest land as well as improving recreational opportunities for the public.</p> <p>The Governor and the Legislature are continually evaluating the priorities of the State given the limited funding. The</p>

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				funding for the access of the Vallenar area has remained in the previously authorized capital expenses during this recent process.
Economics	Greenpeace	3/05/2015	<p>Comment on Page 2 of letter under I.A. summarized as follows:</p> <p>The economic analysis is speculative, does not provide numerical analysis.</p>	The uncertainty of the timber industry's health as well as normal market fluctuations provide insufficient context for a more definitive revenue statement. Specific numerical analysis is not required for the State to make a decision that it is in its best interest to proceed with the project. The capital outlay for the project would be a significant cost to a timber purchaser due to the land ownership configuration. Due to the State's long term ownership position of the State Forest, this risk and cost is more appropriately carried by the State for this parcel.
Economics	SAF	3/5/2015	The DNR is weighing the option as to whether to offer all of the volume in single timber sale or in a series of smaller ones. It seems the former option would be preferable with an export allowance component, in that it would attract interest from more parties and generate more revenue to DNR. A domestic processing requirement could be	No change required. The DOF will consider this perspective as it develops the final sale configuration.

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			incorporated into terms of the sale to meet the small demand of the local market.	
Economics	Sallee/ Walsh	3/5/2015	Inherent in the forest management discussion regarding transition to young growth is a presumption of scale that excludes micro-operators like myself.	No change required. The DOF designs sales for a variety of sized sawmills that reflects the demand of the market.
Economics	Sallee/ Walsh	3/5/2015	3) I've seen no assurances that the state has any intention of promoting primary processing of timber within the communities closest to that timber;	The DOF has a track record of supplying and encouraging local markets for State timber for more than 15 years in Southeast Alaska. Timber will continue to be sold in both the export and the domestic market depending on the economic requirements of the forest management. The State encourages local use of the timber where economically feasible.
Economics	TCS	3/3/2015	Will any of the revenues from this sale go into State coffers to be used for habitat restoration or will they be used for further DNR depredation of the Tongass?	The DOF is funded in part by timber sale receipts. The funding pays for a variety of professional positions and projects used to administer and implement the Alaska Forest Practices Act and provide state timber sales across the State.

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Economics	Walker Pryor	3/3/2015	The Lewis Reef Timber sale “Road to Resources” project will produce one of the largest improvements in Ketchikan’s economy in recent history. In today’s world the best use of our tax money is to benefit as many residents as possible with the same expenditure. The timber business needs to redevelop itself in the changing world markets and the best use of Alaska’s money is to accomplish several goals at once.	No change required. The DOF understands you to mean the Vallenar Bay Timber Sale.
Ecosystem	Sallee/ Walsh	3/5/2015	Decay has been an integral part of healthy forests for millennia, playing a huge role in creating the very conditions that render old growth forest structure so valuable to animal and plant diversity as well as fine-grained wood for human use. “Working forest” ignores ecosystem services that forests provide: Holding snow and water, moderating stream temperatures, erosion control, wildlife habitat, diversity, etc.	<p>The DOF agrees with the statement that decay is integral to a forest ecosystem and that the slow growth of the forest makes portions of the forest of value to man. The ADNR through the use of the land planning process has allocated resources for the values you have highlighted as well as acknowledged the management intent of the federal lands committed to these like purposes.</p> <p>This sale is partly second growth. The use of that second growth timber is representative of the intent of the term “working forest”. The term “working forest” as it is used in this document further</p>

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				<p>refers to the ability of the citizens of the State to access and use the forest, including timber harvest. The Alaska Forest Practices Act and Regulations (FRPA) will be used to manage the resources you have identified.</p> <p>The Alaska Forest Resources and Practices Act best management practices have been determined to provide adequate protection from potential water degradation. Information from field inspections, compliance monitoring, and the state's Alaska Clean Water Actions database indicate that FRPA is effective in protecting water quality. The annual report from the Department of Environmental Conservation (DEC) on the effectiveness of FRPA concluded that, "when properly implemented, the BMPs are effective at protecting water quality." No streams have been identified or listed for violation of water quality standards as a result of forest operations subject to the FRPA best management practices.</p>

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Fisheries	ADFG-Habitat	3/4/2015	We appreciate the consideration of the location of fish habitat by locating the proposed road to avoid the majority of anadromous fish habitat, and making concessions for clear span bridge over fish-bearing water bodies.	Noted, the DOF will coordinate site specific applications with ADFG as they are developed during the design phase.
Fisheries	Sallee/Walsh	3/5/2015	“...locate the road higher on the hillside and consequently avoid anadromous habitat altogether” (p9). I think I heard an almost identical statement from proponents of the Lewis Reef road. Yet, a major bridge crosses Lewis Creek a few dozen yards above tidewater in that anadromous stream.	Best management practices have been implemented in the planning of this project. The ADFG has visited all stream crossings on the project and concurs with the DOF’s location and representation.
Fisheries	TCS	3/3/2015	Protection of Vallenar Creek is essential with careful monitoring of buffers and ensuring tributaries to the creek and estuary are not blocked by road building. Salmon are the mainstay of commercial, sport and traditional usage; maintaining genetic diversity is essential for the long term health of our wild salmon.	The DOF will to follow the Alaska Forest Resources and Practices Act (FRPA) and regulations for retaining timber within 100 feet of the anadromous streams within the drainage of Vallenar Bay. Additionally per the Central Southern Southeast Area Plan, the FRPA and the guidance of the ADFG-Habitat, the DOF will be retaining the timber from 100 feet of the stream to 300 feet for wildlife travel and integrity of the 100 foot retention area.

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General	Greenpeace	3/5/2015	<p>D. Other reasons the Vallenar Bay Timber Sale is not in the State's best interest.</p> <ol style="list-style-type: none"> 1. Size of openings. 2. Blowdown. 3. Cherry picking for unit location. 4. So-called "decadent" old-growth forest is often good habitat. 	<p>1. The PBIF describes a variety of openings being considered for different areas of the project. The openings have been approved in land use designation as appropriate for timber harvesting and are matched to the objectives of the project.</p> <p>2. Blowdown is a natural disturbance mechanism in Southeast Alaska that will occur regardless. Timber harvest may accelerate this in some areas. The added area due to blowdown is generally low relative to the size of the area harvested. The DOF has considered important habitat that could be affected by blowdown in the proposed plans such as retaining a no harvest area adjacent to the Vallenar Creek area.</p> <p>3. None of the units are "cherry" timber. The units are a mix of site growth capabilities and generally speaking on the middle to lower end of the scale for the region as a whole</p> <p>4. Forests offer a variety of attributes that make them desirable to different species depending on their stage of development</p>

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				and management. Please also see other comments/responses on ecosystems and wildlife habitat.
General	Greenpeace	3/5/2015	<p>II. A. “General comments on the Proposed Best Interest Finding document. The “management objectives” paragraph on page 1 is incomplete and one-sided”</p> <p>It does not consider the other public interests concerning natural resources in Article VIII of the Alaska Constitution.</p>	<p>The BIF addresses management objectives that must be viewed in the larger context of legislative direction for SESF management, existing State land use plans for multiple use, and FRPA requirements, which implement Article VIII of the Alaska Constitution.</p> <p>The PBIF management objectives reflect the priorities of the timber sale program and SESF on land where Forestry is a designated/allowed use under State land use plans. Regardless, the proposed sale must meet FRPA/Title 38 requirements for considering both timber and other forest uses.</p>
General	KGB	3/5/2015	The Ketchikan Gateway Borough has supported, and continues to support timber sales on Gravina Island and looks forward to the project. Furthermore, the Borough has supported the proposed timber sale at Vallenar Bay through the issuance of an easement to the Alaska	No change required.

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			Division of Forestry, which will not only provide access to State land for the timber sale, but will also provide the needed industry and potential future access to private property and Borough property in the vicinity.	
General	Sallee/ Walsh	3/5/2015	From my perspective public land managers should probably be dedicating some effort to streamlining access to dead/down timber.	No change required. The DOF does sell dead and down timber when access and manpower make it practical.
General	Sallee/ Walsh	3/5/2015	I and other deer hunters have used this relatively open timber as well as a similar band of open heavy timber farther west for easy access to the higher muskegs and alpine ridges west of High Mountain. I see no indication in the PBIF that DOF has any interest in excluding these bands of very merchantable trees from the chainsaw.	Your use of the area is noted. The PBIF proposed the area you refer to as being appropriate for limited harvesting that will benefit road safety and the recovery of the blowdown. The cuts will generally be small to reflect the visual resources of the area adjacent to the subdivision.
General	Sallee/ Walsh	3/5/2015	If a majority of the volume and value of timber logged from state lands cannot be at least primarily processed in or near the community closest to that timber the trees should be left standing.	Noted. The DOF sells timber destined for both local processing and export, and both types of operations provide jobs in Alaska. By State statute, the economic requirements of the site and sale management costs typically drive how sales are sold. The State

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				respects and encourages local processing where feasible, and continues to offer sales in various sizes to support a variety of operations.
General	Sallee/ Walsh	3/5/2015	From my perspective there should be an outright ban on round log yellow cedar export from any lands in Alaska.	The amount of Alaska yellow-cedar is projected to be relatively small from this sale. The export market for Alaska yellow cedar export in the past several years has been waning. Due to the proximity of Ketchikan, the market for local use of the species may be practical. The Alaska yellow-cedar tree is not listed as an endangered species. The ban of a particular species of timber for export is outside the scope of this best interest decision.
General	Sallee/ Walsh	3/5/2015	The foregoing would suggest that timber extractions on Gravina and indeed on any forests in SE Alaska should be kept small and localized. They also suggest this sale and road project are not, as claimed by the PBIF, in the “best interest” of the State of Alaska.	The DOF offers timber sales in a range of sizes in response to the variety of sales needed by the timber industry.
General	TCS	3/3/2015	Whose “public interest” does this serve? The single bidder on the sale will profit, road building companies will profit,	The proposed timber harvest is developed under the sustained yield principle of forest management. The BIF adheres to the

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			<p>barge lines moving this timber will profit, a few administrators and timber fallers will profit, but the values of wildlife and carbon sequestration will be sidelined, as they have been since the 1950's. TCS encourages DNR and the State to seriously consider the importance of the Tongass in relation to climate change and to limit the number of old growth trees that will be cut in this proposal.</p>	<p>applicable statutory and regulatory requirements regarding management of state forests for sustained yield and multiple uses. Please see other comment responses regarding sustained yield for discussion on allocation of resources for the variety of users. The proposed sale is in an area that has been allocated by the State for forest management and in particular timber sales. The allocation process accounted for the need to preserve other uses and how adjacent federal land was also doing this allocation as well.</p> <p>This proposed sale will harvest a combination of old growth and second growth timber.</p> <p>The issue of climate change and carbon sequestration is a subject outside the scope of this best interest finding.</p>
Opposition	Palkovic	3/5/2015	<p>Part the reason I purchased the property is because I did not anticipate a road being built behind my lot; no roads were identified in the status plat and the ground behind the subdivision appeared too steep and unstable to allow for road</p>	<p>The DOF has looked at the hillside from a stability standpoint and agrees that placing a road higher on the hillside in this location is not appropriate. The road as located avoids sections of the hillside above the subdivision that may be unstable over time.</p>

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			construction. So personally I am against Alternative B and would prefer Alternative A instead.	The location of the road was chosen adjacent to the subdivision due to the natural bench at that location.
Public Outreach	TCS	3/3/2015	Gravina Island is used by Alaska natives for traditional and customary hunting and gathering. Most of this use is undocumented by the State; however, many Ketchikan, Saxman and Metlakatla residents depend on the island's resources. These uses must be considered. Contacting the Saxman city hall and Natives living in Ketchikan and Metlakatla should be part of the process in determining how Gravina Island will be used.	The DOF formally contacted the Native organizations of the Ketchikan, Saxman and Metlakatla during the public comment period; no written comments were received from the Native communities. The DOF received verbal response of no objection from the Metlakatla aboriginal rights representative. The DOF also has dialoged with Ketchikan Native community representatives when the project was being initially developed.
Silviculture	Sallee/ Walsh	3/5/2015	There are several references to "mature" and "maturing" young growth. Which is it? Sounds as if the DOF has every intention of cutting second growth before it's reached its optimum mean annual increment.	The DOF manages its land based on an average volume per acre that it has seen over time to represent the recoverable volume/ acre (26 MBF) on state-owned sites in Southeast Alaska being managed for commercial timber. The young growth timber on the site being considered for harvest has reached this average volume per acre. The characteristics of the piece size are as equally important to the recovery of value. While the stand may not have

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				reached its mean annual increment, it has reached a point of merchantability. As a resource manager the existing market for the timber is weighted against the potential return of waiting longer for additional growth and the condition of the future market. The need to make a supply of timber available to the industry in Southeast Alaska relative to other possible sources of supply is also a key factor in the proposed decision.
Silviculture	Sallee/ Walsh	3/5/2015	The clearcuts themselves, within a few years after they were logged, regenerated into thick brush and later into canopied-over young growth with dark and dead understory, difficult to hike through and unproductive for hunting.	This progression of condition is well documented. The DOF has reserved areas known to be productive for wildlife. It will also to the extent funding allows, use planting and precommercial thinning to transition the regenerating stand through the stem exclusion stage as rapidly as practical for a variety of reasons, one of which you have described.
Silviculture	Sallee/ Walsh	3/5/2015	The second growth trees in the old Vallenar Bay clear-cuts still have several decades to reach their most productive growth and mean annual increment, and several decades more to begin to become anything close to resembling quality old	The DOF and ADFG have observed wildlife using the existing second growth areas. The DOF generally manages areas growing second growth timber as commercial forest. The DOF uses a one hundred year rotation period to calculate

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			growth wildlife habitat. What happened to the hundred-year rotation scenario that Vallenar Bay was ostensibly logged under when USFS owned the land before statehood? I'm afraid shortening rotations to revive a timber industry plagued by unsustainable scale is doomed to failure.	the sustainable allowable cut for state forest land in the Southern Southeast Area. Individual harvest areas may be cut at younger or older ages depending on the timber characteristics, markets, and management intent for the site. However, the rate of harvest may not exceed the allowable cut. The State has designated other lands where the primary uses are wildlife habitat and public recreation to accommodate different management goals.
Silviculture	Sallee/ Walsh	3/5/2015	Clearcuts, other than those to stop rampant insect or tree disease should be small enough to mimic natural disturbances or wind events. To discourage waste, merchantable timber felled and left in the woods should be scaled post logging and added to the stumpage paid by the entity that purchased the sale. Again, if the tree can't be used then don't cut it down. If OSHA requires trees to be removed for safety then consider leaving a buffer of standing timber around the hazard tree.	<p>The clear-cut method of harvest in Southeast Alaska provides the most consistent and timely natural regeneration of an area post harvest as well as providing the best return relative to the infrastructure and logging costs.</p> <p>The DOF has utilization standards and mechanisms in all of its contracts to encourage full economic utilization of the resource and adequate regeneration conditions post harvest.</p> <p>Non merchantable timber may be left standing when conditions allow, if it meets the silvicultural objectives of the area.</p>

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Soil Stability	Sallee/ Walsh	3/5/2015	Several landslides have occurred in some of the steeper clear-cuts.	The DOF has observed debris slides in both the old growth and the second growth timber on the west side of California Ridge. The Best management practices of the Alaska Forest Practices Act and Regulations will be used to avoid or minimize the potential for slide areas on this hillside. These practices have proven to be effective in managing ground with this potential for movement over time.
Standards	ADEC	3/2/2015	At this stage of the planning process, we recommend that the timber harvest units and spur roads be designed and laid-out to facilitate the yarding of timber away from streams within the units, and to avoid equipment crossings of streams within the ground-based settings. We may have more detailed, site-specific comments to offer during our review of the Forest Land Use Plan(s) that will be prepared for the timber sale(s).	The DOF will work with DEC to comply with these best management practices during the FLUP development.
Standards	Greenpeace	3/5/2015	“Sustainable development” involves more than timber supply.	Area plans and legislative State Forest designations allocate land and restrict its use to allow for active timber management on a portion of the state’s land. Most state land is designated for other uses through the

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				area plans or legislative designations as State Parks, Public Use Areas, Refuges, and Critical Habitats.
Standards	Greenpeace	3/5/2015	D. 5. Eminent domain is not accommodated in the cited statute.	This is not an issue of eminent domain – the land involved is State land. No private property is being taken by the State. The intent of the Borough zoning laws will be respected for timber harvest in the area adjacent to the Vallenar Bay subdivision. The Borough authorized the placement of the road on Borough land and the alignment of the road elsewhere in Assembly Resolution 2544.
Standards	Greenpeace	3/5/2015	6. Important regulatory and administrative standards were overlooked. a. 41.17.060(b) (1). “to the maximum extent possible, all applicable data and information of applicable disciplines shall be updated and used in making decisions relative to the management of forest resources;”	The DOF consulted with ADFG Habitat and Wildlife Divisions during the preparation of the document to obtain the applicable information on those subjects. Information from the USFS efforts on the Gravina EIS was also examined for relevance. The State Historic Preservation Office field reviewed the two alternative locations. The ADEC has been consulted during the public review for concurrence on the plans to maintain water quality on the project. The DOF has additionally spent

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				significant funding and time observing conditions on the ground and is the authority with regard to forest resource decisions.
Standards		3/5/2015	<p>6. Important regulatory and administrative standards were overlooked.</p> <p>b. 41.17.060(b) (3).</p> <p>“administration of forest land shall consider marketing conditions and other economic constraints affecting the forest land owner, timber owner, or the operator;”</p>	<p>The methods and means described in the PBIF are economically feasible to implement with the economic resources available from the legislative appropriation and the revenue of the timber sale. This statement is based on past performance by the DOF on similar ground. Further detail on methods of implementation will be provided in the Forest Land Use Plan. The DOF did not observe obstacles that would prevent typical and proper implementation of the Alaska Forest Practices Regulations (best management practices). The “term economic constraints” refers to the economic reasonableness of the measures employed relative to the gain in value or protection achieved. This clause does not absolve the project from maintaining water quality or protecting other important resources.</p>

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Standards	Greenpeace	3/5/2015	<p>6. Important regulatory and administrative standards were overlooked.</p> <p>c. 41.17.060(c) (1).“forest land shall be administered for the multiple use of the renewable and nonrenewable resources and for the sustained yield of the renewable resources of the land in the manner that best provides for the present needs and preserves the future options of the people of the state;”</p>	<p>The DOF metes out its harvest of timber to achieve this standard. A consistent and sustained use of the timber resource is the goal. The timber resource harvested is governed by the DOF’s policy of decadal averaging to ensure a sustained harvest of timber resources for future users. The harvest will be scheduled to be within the calculated annual allowable cut as averaged over a decadal period. The BIF discusses the other uses in the area and accommodations for those uses within the harvest area. Across southern southeast, State land use plans and legislative designations have allocated state land for a variety of uses.</p>

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Standards	Greenpeace	3/5/2015	<p>6. Important regulatory and administrative standards were overlooked.</p> <p>d.41.17.060(c) (2). “a system of allocating predominant uses or values to particular units within a contiguous area of land shall reflect in reasonable proportion the various resources and values present in that area;”</p>	<p>The Central Southeast Area Plan allocated land, water and associated resources of the area and has been observed in the development of the project plans. The legislature further acknowledged this allocation of use when it designated the area a State Forest. The Southeast State Forest Plan incorporates the allocation intent and knowledge of the central Southeast Area Plan.</p>
Standards	Greenpeace	3/5/2015	<p>6. Important regulatory and administrative standards were overlooked.</p> <p>e. 41.17.060(c) (3). “to the extent its capacity permits, forest land shall be administered so as to provide for the continuation of businesses, activities, and lifestyles that are dependent upon or derived from forest resources;”</p>	<p>The PBIF acknowledges the known users and activities of the area and discusses the anticipated effects to those users, including users of timber and other forest resources. The amount of direct use of the area is limited due to the physical difficulty of access. The majority of the island will continue to not see direct activity for same reason. Indirect use of the area (visual) is likely the largest existing human use of the area. The amount of visual impact has been minimized by land allocation, habitat retention and harvest planning. The amount of impact is appropriate to the benefits that will be derived and is similar to the existing visual conditions over the past 60 years</p>

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				(past harvest activity and regeneration).
Standards	Greenpeace	3/5/2015	<p>6. Important regulatory and administrative standards were overlooked.</p> <p>f. 41.17.060(c) (5). “there may not be significant impairment of the productivity of the land and water with respect to renewable resources;”</p>	<p>The PBIF points to best management practices of the Alaska Forest Practices Act and Regulations (FRPA) and describes specific actions that will be implemented to maintain productivity of the resources. Water quality is maintained as well as soil integrity when implemented. The Forest Land Use Plan(s) will further document this in a site specific manner as information is refined prior to operations. Past implementation of the Alaska Forest Practices Act has been shown to not significantly impair the productivity of the land and water. Timely natural reforestation is not an issue in this area. The amount and quality of fishery habitat will not be diminished by this proposed action. When functioning in proximity to streams maintaining water quality will be the priority of the operations. For more information on FRPA implementation please see the annual Board of Forestry report.</p>

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Standards	Greenpeace	3/5/2015	<p>6. Important regulatory and administrative standards were overlooked.</p> <p>g. 41.17.060(c) (7).</p> <p>“allowance shall be made for important fish and wildlife habitat.”</p>	<p>In addition to the designation of potential habitat in the area plans, the DOF consulted with ADFG on the identification of significant site specific habitat and the appropriate level of protection it requires. DOF will work with ADFG in the FLUP development to locate and implement habitat protection measures. The retention of the center of the Vallenar valley along with the analysis of wildlife travel corridors and other retention areas were developed in consultation with ADFG biologists.</p>
Standards	John & Angela Pool	3/4/2015	<p>Also, we have substantial drainage/creek through our property. If the access project moves forward, my concern is that the watershed may be concentrated into said creek, increasing the volume of water and adding potential for washout. I assume this will be addressed in the road design?</p>	<p>The DOF observed the drainage during road location work and will examine the characteristics further during design and construction of the road. The culvert will be sized and configured per 11AAC 95.305 and standards of good engineering practice. Timber harvest in the drainage will be limited and account for the resources and values located below it.</p>
Standards	Palkovic	3/5/2015	<p>The surface water identified on Map 3 of Exhibit B, next to the ‘5’ in ASLS 84-85 is used as a drinking water source for at least four of the nearby lot owners. I ask that extra care be taken to protect the</p>	<p>The DOF will stipulate the use of Best Management Practices by contractors operating in the area and will seek to meet State standards for water quality on this drainage. The ADEC has been notified of</p>

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			water quality when conducting operations near to/adjacent to the stream. Also, it is not uncommon for the stream to overflow its banks during times of high rainfall; please take this information into account when designing the crossing structure and oversize it if possible.	the use and will be guiding the DOF during the implementation of the standards to achieve acceptable results.
Standards	Sallee/ Walsh	3/5/2015	Forests that I've spent years walking through while hunting and hiking on Gravina have been logged under the auspices of the State Forest Practices Act and left considerably diminished;	<p>The slash depth is typically defined with the intent to provide timely conditions for regeneration and where recommended by ADFG for ease of wildlife travel.</p> <p>Utilization/slash standards on State land in southeast Alaska are a requirement of the timber contract. They are not a direct requirement of the Alaska Forest Practices Act. Various land owners have different opinions on the appropriate condition of the forest slash post harvest. The utilization or residual nature of the slash post harvest is a product of economics, the land owner's desires and the timber purchaser's requirements in the contract. The DOF's utilization standard requires the removal of "merchantable timber" as defined in the contract that has been felled. Currently, merchantable timber is a No. 4 or better</p>

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				<p>sawlog which is at least 12 feet long plus trim, at least 6 inches in diameter inside the bark at the small end with at least 50% net scale</p> <p>Stand conditions on State sales are typically as good as they were in the original stand for pedestrian travel at the completion of harvest. Once the stand has regenerated post harvest, travel ease through the stand will diminish for a period of time until the stand is approximately 30 -40 years old at which time travel under the tree canopy generally becomes less arduous again.</p>
Standards	Sallee/ Walsh	3/5/2015	Unless specific timber sale contract language dictates otherwise I see little evidence that future timber extractions will be any cleaner and less wasteful than what's already happened.	See previous comment response.
Standards	Sallee/ Walsh	3/5/2015	Leave an unlogged public access right of way and enough surrounding trees to present a buffer against blow down for the afore-mentioned bands of old growth.	The DOF will examine the wind stability during the layout of the timber on California Ridge in conjunction with the visual concerns near the subdivision.

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Standards	Sallee/ Walsh	3/5/2015	Consider the cumulative impacts from logging. Many of the designated state forests adjoin or lie in close proximity to lands that have already been heavily logged. Consider the likelihood of more landslides on steep hillsides already destabilized by previous logging.	The cumulative nature of the activities was considered in the development of the land use plans and legislative designations. Gravina Island contains approximately 61,404 acres. Of these 39,393 acres is National Forest System lands that are essentially in “Roadless” status. The State Forest on the island contains approximately 7,499 acres. The State has harvested approximately 435 acres to date in the Bostwick area in the form of clear-cuts. The remaining acreage is owned by the Ketchikan Gateway Borough, the Mental Health Trust, the University of Alaska and private individuals. Out of these owners the MHLT is the only land owner that has harvested timber in the past 10 years on the island other than the State. The AMHLT logged 83 acres using clear-cut methods in three separate units; they additionally logged by helicopter portions of the east side of California Ridge using selective harvesting methods (non merchantable timber was left standing). Typically this amounts to retaining approximately 75% or more of the stems in a given area helicopter logged; helicopter logging has a higher cost

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				<p>therefore the value of the logs cut and removed are typically constrained to higher quality. In the areas that were helicopter harvested riparian retention per the Forest Resources and Practices Act were retained in full.</p> <p>The DOF has observed the indicators of soil and debris movement referenced and will be using the Alaska Forest Resources and Practices Act and Regulations to avoid or mitigate these areas when they are encountered. The location of the road at the toe of the ridge and the minimization of harvest above the subdivision is one example of this management perspective.</p> <p>A FLUP will be prepared for each sale authorized by this BIF. The cumulative impacts of the sale(s) authorized by this BIF will be considered in each FLUP.</p>
Standards	Sallee/ Walsh	3/5/2015	The negative impacts of extensive helicopter logging, clearcutting and road building are already evident on Gravina. For helicopter-logged units, the logging slash should be cut up and spread around so it doesn't present obstacles to hikers	The DOF is not proposing helicopter harvest in the Vallenar Bay area as part of this decision. Your comments on the condition of the residual stands in other areas helicopter logged and used traditionally by the public will be

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			and wildlife.	considered if this type of logging method is used in the future on State Forest land.
Standards	SHPO	3/12/2015	We agree with the reports finding of 'No Historic Properties Affected', however, please keep in mind that there is still potential to find previously unidentified resources during the course of the project. As such should inadvertent discoveries of cultural resources occur during the duration of the project, our office should be notified so that we may evaluate whether the resources should be preserved in the public interest (as specified at Section 41.35.070[d]).	As outlined in the PBIF and is also standard procedure in our Forest Land Use Plans and contracts, any previously undocumented historic properties and cultural resources that are discovered will be managed in a timely manner with direct consultation with SHPO.
Standards	KGB	3/5/2015	In addition, the Borough notes that the Alaskan Division of Forestry has acknowledged that it will follow the Borough's zoning code for the logging on the State Property.	The DOF will submit a zoning application at the time it publicly notices the Forest Land Use Plan(s).
Support	Chamber	3/4/2015	Please note the support of our Chamber and of Ketchikan's business community for the Vallenar Bay Timber sale (SSE-1345) and the potential it possesses to positively impact the lives and	No change required.

Category	Commenter	Date	Comment	DOF Reply
			livelihoods of Southeast Alaskans.	
Support	Chamber	3/4/2015	The timber offered in these sales will help to sustain jobs and industry both in Ketchikan and on Prince of Wales Island, a place to which Ketchikan is closely linked economically, socially, and culturally. Now more than ever, no opportunity to better the lives of individuals living in southern Southeast Alaska should be overlooked. It is inarguable that this sale offers a small but very real opportunity to our region and its people.	No change required.

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Support	SAF	3/5/2015	This island has been underdeveloped as far as public timber sales opportunities are concerned, at least on the part of the Forest Service which is by far the largest timber holder on the island. It is encouraging that DNR sees an opportunity to offer for sale a substantial amount of timber on the island in conjunction with further developing a public access road for the benefit of the local community.	No change required.
Support	Mainardi	2/07/2015	<p>"I truly believe it is in the best interest of the State of Alaska, as well as Ketchikan Gateway Borough, to commence this project." The reasons he supports it are:</p> <ol style="list-style-type: none"> 1. It will create jobs and help create a sustainable logging industry in the Ketchikan area. It will create construction jobs as well as logging and mill jobs. The town has this type of labor and they should be retained. 2. Ketchikan needs room to grow; the road encourages development in the future of Ketchikan by 	No change required.

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			<p>access to land.</p> <p>3. Added revenue to the airport from rock sales and use of the infrastructure such as the ferry.</p>	
Support	Walker Pryor	3/3/2015	This timber sale will provide much needed jobs and the Lewis Reef road will open Gravina Island for development to the Gateway Borough, with an increase in taxable revenue. As a bonus the tax paying citizens will have a road to their property in along the inside passage and into the Vallenar Bay subdivision for the future construction of new business sites, personal cabins and homes.	No change required. The DOF understands you mean the Vallenar Bay Road.
Support	Walker Pryor	3/3/2015	Over the recent months I [as a private citizen] have contacted the land owners by US Mail on Gravina Island and asked for their support. I have signed affidavits [that I have given copies to the Gateway Borough and to the Alaska Department of Natural Resources] the dozens of land owners who like me support this road project, as these documents attest to. Southeast Alaska needs to step into the future; this is a “win- win” project that	No change required.

Category	Commenter	Date	Comment	DOF Reply
			needs to be approved and constructed	
Support	KGB	3/5/2015	Therefore, I express support of the preliminary decision for the timber sale project on behalf of the Ketchikan Gateway Borough.	No change required.
Sustained Yield	TCS	3/3/2015	The section on sustained yield is inaccurate. If we had cut the Tongass for sustained yield, there would be small clearcuts instead of huge tracts of second growth. After all, our temperate rainforest takes centuries to regenerate, and State and Federal agencies should have apportioned the Tongass on a 200-300 year rotation. And although the rate of clear cutting has slowed, it is because the most productive areas have been cut and timber sales are now offered in areas that hold smaller amounts of economically valuable timber. Much of the Tongass is not utilizable by either the timber industry or wildlife because of steep terrain, rocks, ice, muskeg etc. so logging is limited to the areas that produce higher volumes of timber, the	The State through the use of the land planning process in the Central/ Southern Southeast Area Plan has allocated use on State land and documented other significant land owner uses. The maintenance of important habitats (old growth as well as other wildlife habitats) was acknowledged in this process. The Legislature used this planning process outcome and consequently designated a portion of the general use land in the area plan into the Southeast State Forest for the purpose of active forest management. The primary purpose of state forest is “timber management that provides for the production, utilization and replenishment of timber resources while allowing other beneficial uses of public land and resources” (AS 41.17.200). To focus management on maintaining existing

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			<p>same areas necessary for healthy wildlife populations. However, wildlife numbers are not mentioned in the announcement. Only when their numbers are depleted is remedial action taken. TCS requests that wildlife habitat be given as much consideration as “multiple use” and “public interest”, both of which only consider human usage of the island.</p>	<p>conditions on the State Forest is inconsistent with the legislative intent. However, the BIF does consider non-timber uses in the sale area, including an expanded discussion of wildlife habitat following additional consultation with ADF&G. The type and shape of wood products will vary by location to reflect the capability of the site and the economic and social demands of the area. In all cases, DOF is required to manage its’ timber harvest on a sustained yield basis (AS 38.05.065(b) (1)).</p> <p>“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 (12)). Per As 38.04.910 (5) "multiple use" means the management of state land and its various resource values so that it is used in the combination that will best meet the present and future needs of the people of Alaska, making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to</p>

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				<p>conform to changing needs and conditions; it includes(A) the use of some land for less than all of the resources; and (B) a combination of balanced and diverse resource uses that takes into account the short-term and long-term needs of present and future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historic values.</p> <p>The Division defines “regular periodic output” as output over a ten-year period. The annual allowable cut calculation is determined by using the area regulation method, a method that best utilizes existing forest stand information. The area regulation method involves determining the net-forested acres available for harvest and dividing that number by the rotation period. The rotation period is the time it takes to grow a commercial stand of trees. A 100-year rotation is a conservative standard for Southeast commercial forest land and is currently being used by the Division of Forestry. This rotation age could be</p>

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				adjusted in the future as more information on growth patterns of even-aged timber stands become available. Initial studies indicate that a rotation age as low as 60 to 80 years may be feasible on managed lands in Southern Southeast Alaska for the type of products being used elsewhere in the timber industry.
Sustained Yield	Greenpeace	3/5/2015	7. Sustained yield, as applied and defined in statute for the State Forest. PBIF has not adequately taken into account the breadth of the Constitution's sustained yield requirements in the form they are expressed in statute: AS 41.17.220. Management of state forests. <i>and</i> AS 41.17.950. Definitions.	Please see reply above on this subject.
Wildlife	ADFG-Habitat	3/4/2015	The Vallenar Creek drainage provides important and productive fish and wildlife habitat on Gravina Island. In addition, the Vallenar Creek drainage provides a corridor connecting to the Bostwick Creek drainage. The corridor between the two drainages provides a travel route for wolves and deer, and extensive habitat for spawning salmonids. The required 300 foot no- harvest buffer	No change required.

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			on Vallenar Creek, as well as the surrounding scrub/brush/muskeg habitat, should help to maintain this habitat.	
Wildlife	Greenpeace	3/5/2015	The timber sale would cause irreparable harm to precarious deer habitat and populations on Gravina Island.	The DOF consulted the ADFG-Wildlife Division during the development of the PBIF. We specifically looked at the potential impact to deer that the proposed actions might have. It was the assessment of the ADFG that the areas being developed would not have significant effect on the deer population of the island based on location and proposed configuration of the plan. Please see the expanded Wildlife section of the BIF.
Wildlife	Sallee/ Walsh	3/5/2015	Clearcutting eliminates cavity nesting and den-building habitat for bears, birds, and smaller mammals.	Logging does influence wildlife habitat. Impacts to significant wildlife habitat identified by ADFG will be avoided or mitigated. A clear example of this is the designation and reservation of the entire center section of the Vallenar Valley other than that required for the access road.

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Wildlife	Sallee/ Walsh	3/5/2015	Adding roads and more fragmentation to a region already fragmented by islands and muskegs and previous clearcuts upsets the predator/prey dynamic between predators, including humans, and deer.	The DOF consulted with ADFG regarding deer and wolf dynamics on Gravina Island and how they might be affected by the timber sale. The DOF timber sale as planned will not significantly change the sustainability of the overall deer or wolf population on Gravina. It will affect deer populations in the immediate area of the harvests and road. Given the management intent and designation of the parcel that is a product of the land planning process; this limited affect has been determined to be acceptable in light of other benefits. The DOF has added additional information describing this anticipated effect in the Wildlife section of the BIF.
Wildlife	TCS	3/3/2015	Gravina's deer harvest is at a low ebb. South facing slopes necessary for winter survival have been cut, and remaining land that was available for forage has been impacted by intense deer forage. Cutting timber on the island will further reduce deer habitat. Wolves are blamed for poor deer numbers but the lack of sufficient habitat for deer is a more probable factor in determining deer population. Although TCS supports deer	Please see the expanded explanation of deer and wolf effects in the Wildlife section of the BIF.

Category	Commenter	Date	Comment	DOF Reply
			harvest, we also support protection for the Alexander Archipelago wolf.	