

ALASKA LEGISLATURE COMMITTEE FILES 1991-1992 8672
7209 HOUSE RESOURCES

To Representative Cliff Davidson
Chair, House Resources Committee
Alaska State Legislature, State Capitol
Juneau, Ak 99801-1182

RECEIVED MAY 92 1992

I have lived in Ketchikan, Alaska, all but one year of my life (35 years) and would like to say that I am opposed to the Cape Fox Land Trade, for the following reasons:

1. Trading a beautiful old growth, productive, lake ecosystem for half of a muskeg lake and huge clearcut makes no sense at all.
2. There's no guarantee that the remaining roads will be available to us. Cape Fox assures us, now, that the roads will be open to the public. But 10 years later, when the logging is finally done, and the roads are finally available, there'll be new management and suddenly it will be "Oops, sorry! Roads are closed." If the state and borough won't maintain the roads, who will? Cape Fox? Out of the goodness of their hearts? I hardly think so.
3. Cape Fox does a poor job of harvesting. They have few rules to follow, unlike white man. There's no esthetic planning. No secondary processing. One simply has to look at their cut in the Ward Lake area to see their 'rip it out and get rich' style. Natives have learned, too well, the ways of the white man (and this is not prejudice, as I respect original Native Americans more than original whites).
4. Clearcuts are ugly. There is nothing beautiful about a clearcut. People are becoming more sensitive about these huge scars. You can't go anywhere in Ketchikan without seeing one. In our lifetime we will not see the existing cuts as natural-looking forests again. How much more of our surroundings will we allow to be cut down, paved over, built on - manipulated in some way? This is a big issue in the tourist industry where I work.
5. Recreate in a clearcut? It's pathetic when our standard of quality is so low that we have to be happy recreating in a clearcut. It's like telling a little kid - "Sorry about your playground, all the swingsets and merry-go-rounds were yanked out of here yesterday. But here's a couple 2 by 4's to walk on over the mud. And hey, look at the bright side, you'll see the holes in the ground where the equipment once was, and you might find a toy car in the mud. Hope that'll do."

As a society, we are rotting from the inside out.

This is an issue of a private company's economic gain at the expense of public wildlife, its habitat, esthetic beauty, and quality recreation. Short-term profits, long-term greed.

If I have to choose I'll say no to the land trade, yes to a state park. Thank you.

Sincerely,

Cindy Ross Barber
P.O. Box 8598, Ketchikan, AK 99901

Cindy Ross Barber

Mr. & Mrs. Fred Athorp
18 Creek Street
Ketchikan, AK 99901
(907) 225-3452

Honorable Cliff Davidson,
Chairman House Resources Committee
Alaska State Legislature
State Capital, Juneau, AK 99901-1102

Honorable Cliff Davidson,

We wish to express our sincere opposition to Governor Rickal's bills to trade virgin Alaska land for clear cut Cape Fox Corp. land. We feel this is a very dangerous precedent that will be perceived for years to come as "less than honorable".

This exercise of greed does not serve the best interests of the people of Ketchikan or of the State of Alaska and we would appreciate your effort to stop it.

Sincerely,
Fred and Cheryl Athorp

3/11



Dear Rep. Davidson,
I am writing to say
I oppose the proposed
land trade between the Lakes
State and Cape Fox. I
do not enjoy spending
my valuable recreation
time in clearcut. I want
my family to recreate in the
beautiful forest thank you
Burdett Box #143 KTN
1307361

Rep Cliff Davidson
House Resources Comm.
Pouch V
Juneau, AK. 99811

JUST A TOURIST ATTRACTION ... the
few remaining boardwalks and streets were primary
transportation routes in early Ketchikan. In photo
at left, Ketchikan's famous "street on stilts" over-
looks busy Tongue Narrows. Infamous Cross Street
was once Alaska's most famous "red-light" district.
Today it is a designated historic site.
Photos: R W Pictish Agency
Publ. by J & M Sees, Anchorage, AK 99501

Honorable Cliff Davidson
 Chairman, House Resources Committee
 Alaska State Legislature
 Juneau, Alaska 99801-1182

May 5, 1992

Dear Honorable Chairman Davidson,

I am writing as a Ketchikan resident opposed to the Cape Fox Harriet-Hunt-for-Leask-Lakes Land Trade.

I am a school teacher at Ketchikan H.S. and I am an avid outdoor recreator. I am interested in having a healthy and wholesome area for my students to recreate. Now they ride their four wheelers and trucks at breakneck speeds all through the clear cut of Harriet Hunt, the proposed trade area.

These kids need a place to naturally slow down and appreciate something that is easier to enjoy than speed.

I would like to plead with you and all the members of your committee here in the 11th hour to think long and hard about the significance of this trade so close to Ketchikan. We need a place to recreate and breathe. Even though we are not thinking in terms of funding another State Park in these scary budget times please consider slating Leask Lakes as a State Park yet to be developed. Let's set it aside for the children of Ketchikan.

Thank you so much for your time and efforts.

Sincerely,

Betsy Burdett
 Betsy Burdett

Box 9143
 Ketchikan, Alaska 99901

CC: House Resource Committee Members

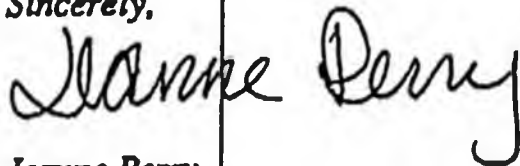
Rep. Lincoln	Rep. Moyer	Rep. Carney
Rep. Zavacki	Rep. Grüssendorf	Rep. Ivan
Rep. Finkelstein	Rep. Hudson	Rep. Leman

Honorable Cliff Davidson
Chair, House Resources
Alaska State Legislature
State Capitol
Juneau, AK 99801-1182

Mr. Davidson,

I am a seventeen year, life long resident of Ketchikan. I have to drive through one clear cut on my way to Ice skate or ski.... I hate it. I do not want to trade a prime forest recreational area for more clear cuts! Vote down the Cape Fox trade.

Sincerely,



Jeanne Perry
618 Sunset Dr.
Ketchikan, AK 99901

Please copy to:

Rep. Lincoln

Rep. Zawacki

Rep. Finkelshtein

Rep. Moyer

Rep. Grussendorf

Rep. Hudson

Rep. Carney

Rep. Ivan

Rep. Leman

P.O. Box 3280
Ketchikan, Alaska 99901
May 3, 1992

Honorable Cliff Davidson
Chairman, House Resources Committee
Alaska State Legislature
State Capitol Building
Juneau, Alaska 99801-1182

Dear Representative Davidson,

I would like to express my sincere desire that the Alaska State Legislature reject passage of the Cape Fox Corporation's proposed land exchange bill (HB578 and SB 465).

This trade is primarily a short-sighted "timber-deal" which will result in squandering and abusing valuable publicly-owned resources. I am personally familiar with these lands and know that several much better options exist for the intelligent management of this area.

Many people in Ketchikan feel the process to push this bill this far has been contrived and manipulated. The Ketchikan Gateway Borough's (KGB) "public hearing" was little better than a kangaroo court. The KGB appeared to have no intention of providing good accurate and factual technical information to local citizens, and in fact seemed to suppress such information as much as possible. Local citizens have not had the information needed to fairly consider the pros and cons of this trade. Both the timber cruise and appraisal are of dubious value. Information given to the public has been twisted and misused. For each reason given for doing this trade there are better reasons for not doing it. The environmental costs have not been factored into the appraisal. No comprehensive assessment has been done regarding the losses of publicly-owned wildlife resources, and no mention has been given to the value of these lost resources. If state lands and timber are put "on the block" they should go to the highest bidder. The KGB has lands that Cape Fox has shown interest in trading for the White River, but the KGB is unwilling to trade their own lands. Finally, why are we selling valuable undamaged state lands for as little as \$72/acre and buying clear-cuts and other unusable lands for about four times as much??

There is not time enough to properly scrutinize this land exchange or examine it in an open and fair public review process. Please put a stop to this land exchange. Thank you for considering this request.

Sincerely,

J. Canterbury
Jackie Canterbury

cc: House Resources Committee members

*Honorable Cliff Davidson
Chair, House Resources
Alaska State Legislature
State Capitol
Juneau, AK 99801-1182*

Mr. Davidson,

I am writing to the stress my displeasure about the proposed Cape Fox land swap.... It appears to me, to be more of a Cape Fox land swipe.

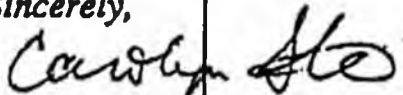
I feel that DNR has not lived up to the public trust of being fair and EQUITABLE to the PUBLIC. The accounting and accountablilty on this trade has not been through, nor is it accurate.

I feel that the process has been slanted. That Cape Fox has put together a "deal" that will benefit Cape Fox almost exclusively.

I feel that this trade will set a negative precedent for other state lands that will reduce our viable forests to stumps.

I urge you the to oppose the Cape Fox land swipe

Sincerely,



Carolyn Stallings

618 Sunset Dr.

Ketchikan, AK 99901

Please copy to:

Rep. Lincoln

Rep. Zawacki

Rep. Finkelstein

Rep. Moyer

Rep. Grussendorf

Rep. Hudson

Rep. Carnry

Rep. Ivan

Rep. Leman

To: Honorable Cliff Davison
Chair, House Resource
Alaska State Legislature
State Capitol
Juneau, Alaska 99801-1182

From: Mike Haddix /
83 Mountain Ash Hts So.
Ketchikan, Ak. 99901

As a resident of the community who allegedly will benefit most directly from the trade, I fail to see any benefits to trading an undisturbed, excellent sport hunting and fishing area for the mostly logged over White River area and the additional parcels included in the Cape Fox-Leask Lakes trade bill (SB 465). Clearly, this proposal is not about roaded access to recreation but rather, economic gains for a corporation. This trade is not a good deal for the public nor does it encourage sustained use and financial responsibility of the Cape Fox Corporation. As a Ketchikan resident I ask you to vote against this bill.

cc: Rep. Lincoln
Rep. Carney
Rep. Ivan
Rep. Finkelstein
Rep. Moyer
Rep. Zawacki
Rep. Hudson
Rep. Leman
Rep. Grussendorf



RECEIVED MAR 6 1992

Beth Antonsen
305 Austin
Ketchikan, Alaska
99901

Alaska State Legislature
State Capitol
Juneau, Alaska
99801-1182

Dear *Representative Cliff Davis*

I am writing in regards to the Leask Lakes/Cape Fox land trade deal. Please, do not let this slip by without a hard look at the facts. This trade is not in the best interest of the people of Ketchikan.

I was born and raised in Ketchikan as were my parents. I love Alaska and it hurts to see our natural resources squandereed for the sake of short term jobs. My family has been involved in the logging industry for over 50 years so I am not anti logging.

We need more forested hiking trails and campgrounds in the Ketchikan area. To offer a clearcut area to us to recreate in simply because it has logging roads is illogical. I don't know anyone with all their marbles who wants to camp or hike in a clearcut. It is a dangerous proposition, especially for children.

What this trade really boils down to is a trade of stumps for trees and favors industry's short term goal (money) at the expense of quality of life for current and future generations. I don't know of any tourist with a desire to camp in a clearcut either.

Again, I implore you to please seek out all the facts about this land trade before you make a decision. There is only so much old growth forest left and once it is gone we can never get it back.

Thank you for taking the time to read this and consider my views.

Sincerely,

Beth Antonsen

Beth Antonsen

CC6DNB

3/9/92

Representative Cliff Davidson
Chair, House Resource Committee

Dear Representative Davidson:

I wish to state my disapproval of the proposed
State - Cape Fox land trade.

I have and still do go to the Leask Lakes area to
fish, hunt and just relax in the serenity of it all;
and I dearly love it there. It is close for boaters
as well as being inexpensive to get into by plane.

I used to spend a lot of time in Harrist Hunt
even before a road was put into it. The same goes for
the White River area. They were beautiful areas to
hike into on the weekends and were close to get to by
car or boat. I have been back to these places and
reminded about the fun times I once had. Now, it
just makes me mad that all or most of the was
sold in the round to foreigners. This has caused a
depressed market and loss of jobs in Alaska. I worked
at the spruce mill when the natives started selling
logs in the round to the Japanese and shortly
thereafter was looking for another job.
Please do not make this trade.

Sincerely,

Ron Z. Skilton
Ronald Whitton
5842 S. Tongass, Ketchikan, AK 99901

3/9/92

Representative Cliff Davidson
Chair, House Resource Committee

Dear Representative Davidson:

I wish to state my disapproval of the proposed State Cape Fox land trade. Cape Fox has shown how badly they manage their lands. Why give them more of our beautiful forest - abundant with old growth and wildlife? Is it so they can sell the logs in the round to Japan? And for much less than they are worth! How does this help Alaska??

As for recreating on the logging roads that Cape Fox leaves behind - what a joke! My heart nearly broke when I saw what had happened to Harriet Hunt and I have not been back since.

Our forests are a precious gift. They should neither be taken nor given lightly.

Sincerely,

Annie Jones Whitton

5842 South Tongass
Ketchikan, AK 99901

3/9/92

Representative Cliff Davidson
Chair, House Resource Committee

Dear Representative Davidson:

I am against the land trade between Cape Fox and the State. It doesn't seem logical to me that the State would accept barren, logged-off land for land that is full of old growth timber. This land is already highly used for recreational purposes. Why give it to Cape Fox to abuse? Please do not make this trade.

Sincerely,

A handwritten signature in cursive script that reads "Michael Patrick". The signature is written in dark ink and is positioned above the typed name and address.

Michael Patrick
PO Box 551
Ward Cove, AK 99928

MAY 5, 1992

FROM: RICHARD E. LOWELL

P.O. BOX 9411

KETCHIKAN, AK 99901

TO: THE HONORABLE CLIFF DAVIDSON

CHAIR, HOUSE RESOURCES

ALASKA STATE LEGISLATURE

STATE CAPITOL

JUNEAU, AK 99801-1102

DEAR SIR,

I AM A KETCHIKAN RESIDENT WRITING YOU TO VOICE MY PROFOUND
 OPPOSITION TO THE PROPOSED LEASK LAMES - CAPE FOX CORP. LAND TRADE.
 TRADING PRISTINE PUBLIC FOREST LANDS FOR PRIVATE CLEARCUTS
 IS NOT AN EQUITABLE TRADE. THIS LAND TRADE WOULD SET A BAD
 PRECEDENT AND ONLY FURTHER DELAY THE BADLY NEEDED REALIZATION
 BY INDUSTRY THAT IT MUST "PROPERLY" MANAGE ITS OWN LANDS IF
 IT IS TO SURVIVE. THERE ALREADY EXISTS AMPLE OPPORTUNITY
 FOR AREA RESIDENTS TO RECREATE IN CLEARCUTS AND THESE
 OPPORTUNITIES WILL NO DOUBT CONTINUE TO IMPROVE EVEN WITHOUT
 THIS LAND TRADE.

PLEASE SAY NO TO THIS RIDICULOUS LAND TRADE.

SINCERELY,

Richard E. Lowell

CC: HOUSE RESOURCE MEMBERS

To Honorable House Resource Member,
I am a resident of Ketchikan and I am opposed
to the Leask Lakes - Cape Fox Corp. Land Trade.
I cannot see how trading cut-over land for timbered
land is a good or fair deal. Sure, roads are nice for
family recreation, but I want to take my children
to see a true Southeast forest, and not stumps and
second growth.

Sincerely,
Karilynn Craker-Redford
243 Wood Road
Ketchikan

P.O. Box 7243
Ketchikan, AK. 99901
May 5, 1992

Honorable Cliff Davidson
Chair, House Resources
Alaska State Legislature
State Capitol
Juneau, Alaska 99801-1182

Dear Honorable Davidson:

I am writing to express my concern about and opposition to the Cape Fox - Leask Lakes land trade. I believe the current proposed plan is short-sighted in terms of economic gain at the expense of proper land use, unfair to the inhabitants of this area, and expresses obsolete values with a disregard for our ecosystem.

Thank you for your consideration

Sincerely,

Robin Crumens
cc: Representatives Lincoln, Zywacki, Finkelstein,
Mayer, Grossendorf, Hudson, Carnet, Swan, Leman

Jeff Budd
Box 7263
Ketchikan, AK 99901

6 May 92

Cliff Davidson
Chair, House Resources Committee
Alaska State Legislature
Capitol Building
Juneau, AK 99801-1182

Dear Mr. Davidson,

I would like to go on record as one Ketchikan resident who does not support the Leask Lakes /Cape Fox land trade. I feel there are many others in Ketchikan who also do not support this trade. I am a member of the Ketchikan city Council, although I am not writing on behalf of the council, and meet a fair number of people during my day. There is a good percentage that do not support this trade in that group. There are many more people that I do not come in contact with who I do not know how they feel one way or the other. I do ~~feel it is not accurate to state that the~~ majority of the community do support the trade.

Thank you for your attention.

Sincerely,
Jeff Budd
Jeff Budd

Honorable Cliff Davidson
 Chair. House Resources Comm.
 Alaska, State Legislature
 State Capitol
 Juneau, Alaska 99801-1182

Dear People,

I am a 21 year resident of Ketchikan and would like to be counted in opposition to the Leask Lake / Cape Fox land exchange. It greatly bothers me that we keep making concessions so a few private corporations can make disproportionate profits. In this case "they" get their "round log" profits and we the people get a stump farm with the promise of a road that this municipality can ill afford to maintain. The people here deserve more than that, They deserve more than a clearing to recreate in. As you know you can't make a silk purse out of a sow's ear and you can't make quality recreation out of a land laid to waste... The Ketchikan area is in dire need of an unspoiled area in which to recreate, teach and enjoy... one that is intact, with an ecosystem that is healthy and thriving... one that can be shared by young and old... Now As it is, the White River tract will take years to recover... it is estimated that it may even take as long as 10 years to properly build the road access.... you and I good people, may never see a balanced healthy environment there in our lifetimes.... Please reconsider this trade... lets do it right the first time... lets have patience and create a world class park out of the Leask Lake area.

Thank You,

Phil M Stage

Phil M Stage
 Box 8164
 Ketchikan, AK
 99901

C.C. Please Forward to House Resource

Rep. Lynch	members	Rep. Grossendorf
Rep. Zawacki	Rep. Hudson	Rep. Carney
Rep. Finkelstein	Rep. Iron	
Rep. Maxey	Rep. Lemon	

May 5, 1992

Honorable Cliff Davidson
 Chair, House Resources Committee
 Alaska State Legislature
 State Capitol
 Juneau, AK 99801-1182

Dear Representative Davidson,

As a concerned resident of Ketchikan, I would like to take this opportunity to express my strong opposition to the Leask Lakes - Cape Fox Corporation Land Trade bill that your committee is currently considering.

While it is true that Ketchikan, like most Southeast communities, currently lacks opportunities for quality roaded recreation, it is also true that the roads we do have either pass through or terminate in extensive clearcut areas. Those of the Ward Creek/Lake Harriet Hunt and Whipple Creek drainages (both owned and rapidly clearcut by the Cape Fox Corporation) are fine examples. We certainly don't need another road through a visually and biologically impoverished landscape just for the sake of being able to put a few more miles on our vehicles. What we do need is a road to/through a fine example of Southeast Alaska's unique, albeit rapidly disappearing, temperate rainforest where local users and visiting tourists can have the opportunity to see and experience what southern Southeast Alaska's forest resources have to offer. The state-owned Leask Lakes tract offers the best opportunity for such a quality recreation experience. Promulgating this exchange for the sole economic benefit of a corporation which has liquidated its resources through non-sustained yield management would preclude the possibilities of establishing a road system that accesses a pristine area. I realize that at this late date in the legislative session, you've all got priority issues to consider, but I ask that you take a moment to consider both the obvious inequity of trading "trees for stumps", as it has been called, and the precedent that such an exchange will establish for the future. Thank you for your time and consideration.

Sincerely,

Kevin J. Hanley
 Kevin J. Hanley

cc: Rep. Lincoln
 Rep. Zawacki
 Rep. Finkelstein

Rep. Moyer
 Rep. Grussendorf
 Rep. Hudson

Rep. Carney
 Rep. Ivan
 Rep. Leman

RECEIVED MAR 24 1992

March 23, 1992

Reid Cross
P.O. Box 8983
Ketchikan, AK.
99901-3983

Andrew W. Pekovich
Regional Manager-Southeast Region
Department of Natural Resources
400 Willoughby Avenue
Suite 400 Juneau, AK 99801

Dear Mr., Pekovich:

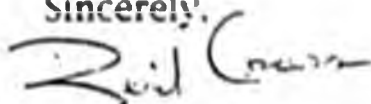
I am a resident of Ketchikan and I attended the recent public hearings concerning the land exchange between Cape Fox corporation and the State of Alaska, D.N.R.

After listening to both sides of the issue I am going to have to speak against the exchange. The Leask Lakes area should stay in the states care for the following reasons:

1. Preservation of Old Growth. I think that is reason enough this area's preservation. We, as humans need to have some old growth, there is no other justification necessary.
2. Economics. I just do not think that this makes very good business sense. The timber at Leask Lakes is very valuable and will just continue to become more valuable as time goes on. Let us leave this place as it is for a long term investment. In fifty years when our grandchildren are making the decisions this timber will be worth a lot more. It is imperative that we leave them with something worth being a steward of.
3. The majority that spoke during the public hearings in Ketchikan were against the exchange.

Thank-you for considering my opinion, please exercise caution and prudence on this decision.

Sincerely,



Reid Cross

445 Front Street Ketchikan, Ak. 99901

April 6, 1992

Representative Cliff Davidson
Chair, House Resources Committee

re: proposed State of Alaska, Cape Fox Corporation (CFC) land trade

Representative Davidson:

I OPPOSE THIS LAND EXCHANGE

In the preliminary exchange agreement the Ketchikan Gateway Borough states: QUOTE

"The Ketchikan Gateway Borough believes that the resultant direct and indirect benefits of the land exchange including economic, recreation, habitat, environmental, and transportation benefits represent a unique and significant community benefit." ENDQUOTE

I believe there is NO DOUBT that this community supports all of the items listed above.

However, I question that THIS EXCHANGE accomplishes any of these goals terribly well, and there are some that it definitely hinders.

ECONOMICS. The economics of a short term infusion of cash from a timber sale are insignificant compared to the economic benefits of a state park, which is an alternative plan that I support, and there are others possibilities as well. If the trade goes through, I doubt that what we have after logging will be very attractive to our guests, and if the community is even willing to pay for the maintenance of the roads it will be a net loss for year after year. This will likely never end because the road is such that it may never be taken over by DOT or FHA.

RECREATION. I seriously question the recreational benefits of this exchange. The plan is simply a logging plan. It may be a relatively GOOD logging plan. However, there has been no indication, and definitely no guarantees that the state or the borough has interest or money, to open and maintain roads or develop facilities whose real intent recreation. In fact there have been indications from the state that it is NOT interested.

We do not know if there will be any access for a period of ten years by which time CFC will be required to complete its logging, so it is not the quick fix to our recreation needs as has been touted.

Additionally, the majority of the land will greatly resemble the views of the clearcuts along the road to Harriet Hunt. These views have never encouraged me to recreate in the vicinity, and I see little reason for the public to pay for a recreational road that drives through more of them. The recreational needs of this community would be far better served by developing the recreational potential of the land that we already own.

If this exchange goes through, the state will gain ownership of several valuable pieces of property. Some parts of them have recreational potential. However, the best we could do, if they were developed, would be second class compared with what we can do with the Leask Lakes tract as it is today.

HABITAT and ENVIRONMENTAL. This trade does not have habitat benefits. I was greatly disappointed to hear the KGB Planning department call this the "environmental alternative" in their analysis and I feel that it is tremendously irresponsible for a public agency to suggest that, with regards to habitat, two drainages with the best habitat cut out of them are better than one. This trade does not benefit habitat, and it is shameful that public agencies would try to present it as such. The outrageous statements such as only 63 acres of habitat affected when 1200 are harvested would be ludicrous if they were not part of public documents. Current estimates show over 70% deer loss in the land that CFC would retain after the trade.

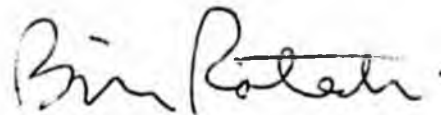
TRANSPORTATION. If we are truly serious about promoting a transportation corridor further up the island, the purchase or upgrade of any roads, such as those in this exchange, should be made with that in mind. In fact the biggest opportunity on the horizon for roaded recreation is linking Ketchikan with the USFS Shelter Cove timber sale. The CFC land exchange buys and upgrades roads which are neither the preferred alternative of the USFS or the DOT. Without resolution of these differences, we may be spending substantial state resources that could in stead be spent on an acceptable alignment that meets DOT, FHA, NEPA, and other standards. To date I see no indication that this exchange

accomplishes its objective of transportation, and may in fact hinder it by spending dwindling resources.

SUMMARY. If there is to be a trade of public resources, it should be done on its merits, with carefully analyzed benefits to the public. As I review the community benefits which this trade is meant to accomplish, I find that it falls very short of achieving its goals. It is my opinion that the best opportunity to achieve economic, recreation, habitat, environmental, and transportation benefits for the community would be to retain the entire Leask Lake Tract in State ownership and use funds raised from limited harvest in partnership with the USFS and DOT to build a road that connects to the Shelter Cove timber sale.

This land trade does not accomplish its intended goals. In fact, it hinders them, decreases the value of the publicly owned land, and decreases our opportunities for future economic benefit and public enjoyment. Please do all within your power to oppose this trade.

Thank you for listening
Bill Rotecki

A handwritten signature in cursive script that reads "Bill Rotecki". The signature is written in dark ink and is positioned below the typed name.

RECEIVED MAR 31 1992
March 28, 1992

Representative Cliff Davidson
Chairman, House Resources Committee
House of Representatives
Juneau, Alaska, 99811

Dear Representative Davidson,

As the chairman of the House Resources Committee, please consider co-sponsoring the enclosed bill. There is a broad based support for protecting the state owned lands within roaded access of Ketchikan for recreational use only.

The agencies such as the Mental Health Trust are charged with the duty to produce income from state land resources vested in their trust. Likewise there is a great motivation at the state level to trade undesignated state lands to the Mental Health Trust to clarify title and fulfill other responsibilities. Because of such forces within Alaska people of Ketchikan are justified in their fears that whatever the outcome of the Leask Lakes Land Trade, any state lands in these areas may be yet be lost for recreational use by the people of Ketchikan.

Specific statutory protection is difficult at this time due to the unresolved issue of the Leask Lakes Land Trade. Through this resolution the legislature can immediately recognize the unique value of these lands to the people of Ketchikan and support development of accessible recreational lands for the people of Ketchikan Gateway Borough.

The resolution reflects accurately the enclosed motion passed unanimously by the Ketchikan State Parks Advisory Board. Included on that board are members from all sides of the Leask Lakes Land Trade Issue. Eric Muensch helped design the land trade for Cape Fox Corporation. Bill Roteki is one of the leaders of the Torgass Conservation Society. Nathan Jackson is a leader within the local Native community. The motion initiating this action passed unanimously.

To facilitate passage of this resolution I have spoken with staff at the offices of Jay Kerttula, Lloyd Jones and Cheri Davis. I have forwarded to them copies of the bill, requesting that they co-sponsor it. If the Resources Committee of both houses introduced the resolution with bi-partisan support, action could be taken in this session of the legislature. Thank you for your time and effort on our behalf.

Sincerely,



Ernest B. Meloche
Member, Ketchikan State Parks Advisory Board
PO Box 6058
Ketchikan, Alaska, 99901
247-6058

P.O. Box 3280
Ketchikan, Alaska 99901
May 3, 1992

Honorable Cliff Davidson
Chairman, House Resources Committee
Alaska State Legislature
State Capitol Building
Juneau, Alaska 99801-1182

Dear Representative Davidson,

I would like to express my sincere desire that the Alaska State Legislature reject passage of the Cape Fox Corporation's proposed land exchange bill (HB578 and SB 465).

This trade is primarily a short-sighted "timber-deal" which will result in squandering and abusing valuable publicly-owned resources. I am personally familiar with these lands and know that several much better options exist for the intelligent management of this area.

Many people in Ketchikan feel the process to push this bill this far has been contrived and manipulated. The Ketchikan Gateway Borough's (KGB) "public hearing" was little better than a kangaroo court. The KGB appeared to have no intention of providing good accurate and factual technical information to local citizens, and in fact seemed to suppress such information as much as possible. Local citizens have not had the information needed to fairly consider the pros and cons of this trade. Both the timber cruise and appraisal are of dubious value. Information given to the public has been twisted and misused. For each reason given for doing this trade there are better reasons for not doing it. The environmental costs have not been factored into the appraisal. No comprehensive assessment has been done regarding the losses of publicly-owned wildlife resources, and no mention has been given to the value of these lost resources. If state lands and timber are put "on the block" they should go to the highest bidder. The KGB has lands that Cape Fox has shown interest in trading for the White River, but the KGB is unwilling to trade their own lands. Finally, why are we selling valuable undamaged state lands for as little as \$72/acre and buying clear-cuts and other unusable lands for about four times as much??

There is not time enough to properly scrutinize this land exchange or examine it in an open and fair public review process. Please put a stop to this land exchange. Thank you for considering this request.

Sincerely,

J. Canterbury

Jackie Canterbury

cc: House Resources Committee members

MAY 5, 1992

FROM: RICHARD E. LOWELL.....
P.O. BOX 9411 ..
KETCHIKAN, AK 99901 ..

TO: THE HONORABLE CLIFF DAVIDSON
CHAIR, HOUSE RESOURCES
ALASKA STATE LEGISLATURE ..
STATE CAPITOL ..
JUNEAU, AK 99801-1182

DEAR SIR,

I AM A KETCHIKAN RESIDENT WRITING YOU TO VOICE MY PROFOUND
OPPOSITION TO THE PROPOSED LEASK LAKE - CAPE FOX CORP. LAND TRADE.

TRADING PRISTINE PUBLIC FOREST LANDS FOR PRIVATE CLEARCUTS
IS NOT AN EQUITABLE TRADE. THIS LAND TRADE WOULD SET A BAD
PRECEDENT AND ONLY FURTHER DELAY THE BADLY NEEDED REALIZATION
BY INDUSTRY THAT IT MUST "PROPERLY" MANAGE ITS OWN LANDS IF
IT IS TO SURVIVE. THERE ALREADY EXISTS AMPLE OPPORTUNITY
FOR AREA RESIDENTS TO RECREATE IN CLEARCUTS AND THESE
OPPORTUNITIES WILL NO DOUBT CONTINUE TO IMPROVE EVEN WITHOUT
THIS LAND TRADE.

PLEASE SAY NO TO THIS RIDICULOUS LAND TRADE.

SINCERELY,

Richard E. Lowell

CC: HOUSE RESOURCE MEMBERS

RECEIVED APR 21 1992

April 14, 1992

Heather Muench
Box 6811
Ketchikan, Alaska
99901

Dear Representative,

I am writing you concerning the Cape Fox (White River/Harriet Hunt/Talbot Lake) land trade between and the State of Alaska (Leask Lakes).

We need roaded recreational lands for today's children; not more locked -up wilderness for elite preservationists.

Families need a place to go that is within a short car drive from Ketchikan. Families often do not have the time, or the money or the physical abilities for long extended hikes into the wilderness.

The U.S. Forest Service's Ward Lake area is over-used. This shows a great need for more of the same type of recreation.

I am the mother of 5 children; ages 11 to 3 years. We cannot go on long hard hikes. This land trade will give us and other families the opportunity to continue to use land currently owned by Cape Fox. The trail along Ward Creek down to Talbot Lake and along it's shore is easy hiking for children. Harriet Hunt has vast recreational opportunities. White River is a large slow moving, mandering river with beautiful sand bars. The area is great for picnics, camping, and hiking. The road access to White River makes it unique.

The Leask Lake Area will be another area for families if the proposed logging plan of Cape Fox's happens. Wildlife and fisheries will be protected while opening; up the area.

Logging is not a dirty word as some people would like you to believe. Logging roads offer easy walking, bike riding, stroller pushing, X-country skiing, snowmobiling, etc. for families. You can recreate in a clearcut.

Please don't believe the lies being told by the preservationists. They claim this is a trade of clearcut for wilderness. The fact is Cape Fox is trading 4336 acres of which only 900 acres have been cut. The rest is pristine wilderness with great potential for families and roaded recreation. The State will be trading 2335 acres of which Cape Fox will only be able to cut 1400 acres. The integrity of the Leask Lakes will remain. This trade will also preserve the integrity of White River, Harriet Hunt, and Talbot Lake. This trade will open up lands currently owned by Cape Fox and thier vast potential will be for the average Ketchikanite to enjoy.

The elite preservationist feels nearly driving through a clearcut to get to a beautiful area ruins the experience for them. They are repulsed by the sight of logged areas. If these areas are not pristine enough for the snobby preservationist, there is about 2½ million acres adjacent or very close by for those people.

Please give families the same opportunities for outdoor recreation. Approve the Cape Fox - State land trade.

Thank you for your attention.

Sincerely,

Heather Muench

Honorable Cliff Davidson
Chair House Resources Committee
Alaska State Legislature
State Capitol
Juneau, Ak. 99801

Dear Mr. Davidson,

I am opposed to the Leach Lakes land swap as currently proposed by the Cape Fox corporation. Trading pristine old growth for clear cut lands is not only an unfair trade it also sets a bad precedent.

Ketchikan deserves better than stumps for recreation. Leach Lakes should be set aside as a State Park for all to enjoy with only timber harvests directly on any proposed roadways being sold.

Sincerely, Terry Troll
PO BOX 8894, KETCHIKAN
AK. 99901

To: Honorable Cliff Davidson
Chair, House Resources
Alaska State Legislature
State Capitol
Juneau, Alaska 99801-1182

From: Meg Cartwright
P.O. Box 9506
Ketchikan, Ak. 99901

I am a resident of Ketchikan and am strongly opposed to the Leask Lakes-Cape Fox land trade proposal currently being considered by your committee. I feel the whole trade process has been railroaded by some Borough Assembly members and the Cape Fox Corporation in an effort to generate 50 jobs for 2 years. This trade proposal is not about roaded recreation but rather short-term economic gains that will primarily benefit private shareholders of the corporation. The state owned Leask Lakes tract is unique in that it is centrally located and has the potential to be developed into a high quality recreational area with roaded access and varying levels of outdoor activities for all residents of Ketchikan. Future roads planned in this area for transportation and utility purposes make this a viable alternative to trading old-growth forest for clearcut lands as outlined in the bill proposal in front of you. Please, I urge you to carefully consider the implications of this bill and the lost recreational value of our public lands if this proposal is adopted.

cc: Rep. Lincoln
Rep. Carney
Rep. Ivan
Rep. Finkelstein
Rep. Moyer
Rep. Zawacki
Rep. Hudson
Rep. Leman
Rep. Grussendorf

Meg Cartwright

Mary McCafferty
 PO Box 3203
 Ketchikan, Alaska
 99901

Honorable Cliff Davidson
 Chair, House Resources
 Alaska State Legislature
 State Capitol
 Juneau, Alaska 99801-1182

Honorable Cliff Davidson,

I am adamantly opposed to the Leask Lakes/Cape Fox Land Trade Bill. I am disappointed that such a trade would be considered acceptable for local residents who seek quality recreation areas. Ketchikan locals deserve a recreation area that has been thoughtfully planned for them. I have hiked the White River Road area. This site offers little in the way of an enriching outdoor experience. Our summer visitors are not expected to vacation in clear cut forests. They expect lush rainforested land inhabited by birds and wildlife. Ketchikan residents deserve that same Alaska. Please give serious consideration to the impact this land trade will have on future opportunities for quality recreation sites in Ketchikan.

Respectfully,

Mary McCafferty

Mary McCafferty

cc:

Rep. Lincoln	Rep. Hudson
Rep. Zawacki	Rep. Carney
Rep. Finkelstein	Rep. Ivan
Rep. Moyer	Rep. Leman
Rep. Grussendorf	

5-4-92

The Municipality of Ketchikan
 Chair, House Resources
 Alaska State Legislature
 State Capitol
 Juneau, AK 99801-1182

Dear Mr. Davidson,

Hello! My name is Carla Potter. I am a resident of Ketchikan Alaska. I am strongly against the Healy Lakes land trade. Not only does it set a dangerous precedent for exchanging forested state lands for clearcut private lands, but it violates my sense of fair trade. I don't want clearcut lands and a bad road to recreate on. I would rather hike into the pristine - undisturbed environment of the Healy Lakes area. We were never given a honest - final appraisal of this trade prior to the public comment period. I have received a letter from the DNR that Cape Fox prior to receiving titles to Healy Lakes would be required to upgrade the ~~12~~ 1 1/2 miles of White River Road. This is not what I would consider good business. Or of any value to sway my position. We have to start considering a long term (hundreds of years, ~~thousands~~) viable use of our miraculous environment. Short term stimulation to the local economy and a road that is expensive to maintain are short sighted and selfish uses of this precious land. Please vote no to the Trade.

Thank You

Carla Potter

423 Cedar
 Ketchikan, AK 99901

cc: Rep. Lincoln
 Rep. Zawacki
 Rep. Finkelstein
 Rep. Moyer
 Rep. Grussendorf
 Rep. Hudson
 Rep. Carney
 Rep. Ivan
 Rep. Lemay

May 5, 1992

Honorable Cliff Davidson
 Chair, House Resources Committee
 Alaska State Legislature
 State Capitol
 Juneau, AK 99801-1182

Dear Representative Davidson,

As a concerned resident of Ketchikan, I would like to take this opportunity to express my strong opposition to the Leask Lakes - Cape Fox Corporation Land Trade bill that your committee is currently considering.

While it is true that Ketchikan, like most Southeast communities, currently lacks opportunities for quality roaded recreation, it is also true that the roads we do have either pass through or terminate in extensive clearcut areas. Those of the Ward Creek/Lake Harriet Hunt and Whipple Creek drainages (both owned and rapidly clearcut by the Cape Fox Corporation) are fine examples. We certainly don't need another road through a visually and biologically impoverished landscape just for the sake of being able to put a few more miles on our vehicles. What we do need is a road to/through a fine example of Southeast Alaska's unique, albeit rapidly disappearing, temperate rainforest where local users and visiting tourists can have the opportunity to see and experience what southern Southeast Alaska's forest resources have to offer. The state-owned Leask Lakes tract offers the best opportunity for such a quality recreation experience. Promulgating this exchange for the sole economic benefit of a corporation which has liquidated its resources through non-sustained yield management would preclude the possibilities of establishing a road system that accesses a pristine area. I realize that at this late date in the legislative session, you've all got priority issues to consider, but I ask that you take a moment to consider both the obvious inequity of trading "trees for stumps", as it has been called and the precedent that such an exchange will establish for the future. Thank you for your time and consideration.

Sincerely,

Kevin J. Hanley
 Kevin J. Hanley

cc: Rep. Lincoln
 Rep. Zaracki
 Rep. Finkelstein

Rep. Moyer
 Rep. Grussendorf
 Rep. Hudson

Rep. Carney
 Rep. Ivan
 Rep. Lenan

May 3 1992

Honorable Cliff Davidson
 Chair, House Resource Committee
 Alaska State Legislature
 State Capitol
 Juneau, AK 99801-1182

Dear Representative Davidson:

I have been a resident of Ketchikan for 28 years, and I am opposed to the State/Cape Fox land trade. It is not right to give our old growth timber to Cape Fox, so they can sell the logs in the round to foreign markets. They are practically giving away these logs and who is benefitting from this? Because the logging industry is in such poor shape, the State should not be allowed to sell public lands knowing the logs will be sold in the round to foreign markets.

Sincerely,

~~Ronald Whitton~~
 Ronald Whitton
 58 1/2 S Tongass
 Ketchikan, AK 99901

cc: Representatives:

Grussendorf
 Lincoln
 Carney
 Finkelstein
 Hudson
 Ivan
 Moyer
 Leman
 Zawacki

To: Honorable Cliff Davidson
Chair, House Resources
Alaska State Legislature
State Capitol
Juneau, Alaska 99801-1182

From: Meg Cartwright
P.O. Box 9506
Ketchikan, Ak. 99901

I am a resident of Ketchikan and am strongly opposed to the Leask Lakes-Cape Fox land trade proposal currently being considered by your committee. I feel the whole trade process has been railroaded by some Borough Assembly members and the Cape Fox Corporation in an effort to generate 50 jobs for 2 years. This trade proposal is not about roaded recreation but rather short-term economic gains that will primarily benefit private shareholders of the corporation. The state owned Leask Lakes tract is unique in that it is centrally located and has the potential to be developed into a high quality recreational area with roaded access and varying levels of outdoor activities for all residents of Ketchikan. Future roads planned in this area for transportation and utility purposes make this a viable alternative to trading old-growth forest for clearcut lands as outlined in the bill proposal in front of you. Please, I urge you to carefully consider the implications of this bill and the lost recreational value of our public lands if this proposal is adopted.

cc: Rep. Lincoln
Rep. Carney
Rep. Ivan
Rep. Finkelstein
Rep. Moyer
Rep. Zawacki
Rep. Hudson
Rep. Lemman
Rep. Grussendorf

Meg Cartwright

724 Bayview
Ketchikan
Alaska 99901
May 4, 1992

Honorable Cliff Davidson
House Resources Chair
Alaska State Legislature
State Capitol
Juneau, Alaska 99801-1182

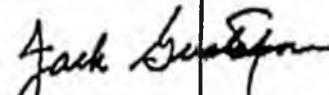
Dear Representative Davidson,

I am a Ketchikan resident and have been following the controversy regarding the proposed Leask Lakes/White River land exchange. I have spent many days in both areas and know each of them well from first-hand experience. Based upon extensive background knowledge, I must tell you that the passage of this land exchange bill would be a terrible mistake. This letter is to express my opposition to SB 465 and HB 578.

If you take the time to examine this bill closely, you will find numerous reasons why this land exchange would be extremely undesirable legislation. We must do a better job of managing Alaska's natural resources if we want to have sustainable development and keep our state a decent and enjoyable place to live. Additionally, if this bill were to pass, I believe it would be an indication that the system of checks and balances designed to safeguard our system of government is no longer functional.

For the good of the general populace of Ketchikan and for the rest of the state, please do not pass this proposed land exchange bill.

Sincerely,


Jack Gustafson

248 P01 MAY 05 '92 14:24
CRAIG FLATTEN
648 BUREN
KETCHIKAN, AK 99901
907-225-1512
4 MAY 1992

HONORABLE CLIFF DAVIDSON
CHAIR, HOUSE RESOURCES
ALASKA STATE LEGISLATURE
STATE CAPITOL
JUNEAU, AK 99801-1182

DEAR SIR:

I AM A KETCHIKAN RESIDENT AND adamantly OPPOSED TO
THE LEASK LAKES - CAPE FOX CORPORATION LAND TRADE.

WE HAVE NOTHING TO GAIN BY THIS WHOLESALE GIVEAWAY OF
PRISTINE, FORESTED STATE LAND IN OUR VERY BACKYARDS. THE
LEASK LAKES AREA ABOUNDIS WITH NATURAL BEAUTY AND
WILDLIFE THAT PROVIDE ENDURING RECREATIONAL VALUE TO
THE PEOPLE HERE. IT MAKES NO SENSE TO TRADE THE
LEASK LAKES FORESTS - AN IDEAL LOCATION FOR A
KETCHIKAN AREA STATE PARK - FOR THE STUMP FARMS
OF CAPE FOX CORPORATION LAND.

THIS TRADE WOULD SET A BAD PRECEDENCE AND IS IN
NO WAY AN EQUAL TRADE. OUR LOSS WOULD BE GREAT.

PLEASE OPPOSE THIS TRADE.

SINCERELY,

Craig Flatten

CC: HOUSE RESOURCE MEMBERS ATTN:

May 4, 1992

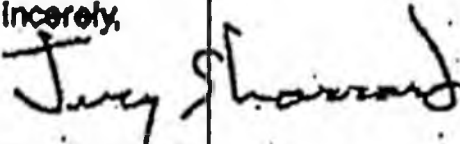
Honorable Cliff Davidson
House Resource Committee
Alaska State Legislature
State Capital
Juneau, AK 99801-1182

Dear Sir:

I would like to urge you to do everything in your power to stop the Lease Lake Land's Trade Bill. I believe this would set a terrible precedent for land trades in the State of Alaska. Trading good timber for stumps makes no economic or recreational sense. I live where there are the most logging roads in the state and they are worthless for anything but use by the industrial timber beasts, not to even mention the lost of wildlife habitat.

Thank you for your consideration.

Sincerely,



Jerry Sharrard
Box 121
Craig, AK 98921

- cc: Pat Carney
- David Finkelstein
- Bill Hudson
- Loren Lehman
- Georgianna Lincoln
- Tom Moyer
- Ivan Ivan
- James Carwacki
- Ben Gruesdorff



RECEIVED MAY 1 1992

Ellen Toll
4204 Cope Street
Anchorage, Alaska 99503
(907) 561-0500

May 2, 1992

Representative Cliff Davidson
P.O. Box V
Juneau, Alaska 99811

Re: Leask Lake Land Exchange

Dear Representative Davidson,

I am writing to voice my opposition to the exchange of old growth forest lands that belong to the State of Alaska to the Cape Fox Corporation in return for heavily logged and clear-cut lands owned by the Corporation. I understand that this exchange has been approved by the Senate and will be before the House for consideration this week. I think the exchange does not serve the interest of the state.

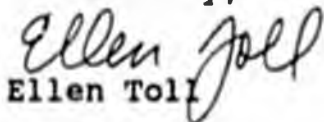
I understand that there has been no final appraisal of the deal, so it is impossible to know whether the acres to be transferred to the state (which have been clear-cut, so the economic, recreational or scenic value must be questionable) are of equal value to the old-growth that would be given up.

I also understand that the Senate amended the bill to provide that the citizens of Ketchikan will be given the opportunity to ratify the exchange. Although I understand that they will be most affected by the exchange, these are state lands. I also wonder about the propriety of a vote by part of the citizens on an appropriation of state money. If the Senate was so unsure of whether the appropriation should be made that they gave Ketchikan veto power over it, then the House should be even more skeptical.

I would urge you to vote against this bill. It is not in the state's interest to give up valuable old-growth forest lands in return for clear-cuts. It also sets a bad precedent for the transfer of state lands into private hands.

Thank you for your consideration.

Yours truly,


Ellen Toll

cc: All members of House Resources Committee

To: Honorable Cliff Davidson
Chair, House Resource
Alaska State Legislature
State Capitol
Juneau, Alaska 99801-1182

From: Tim Zadina
11092 Connie Lane
Ketchikan, Ak. 99901

I am a resident of Ketchikan and am strongly opposed to the Leask Lakes-Cape Fox land trade bill (SB 465) currently being considered. I am an avid outdoors person who enjoys hunting and fishing in the Ketchikan area. The majority of the land we would get in this trade is absolutely worthless as far as I am concerned for recreation. I believe it is possible to get roaded access in to the Leask Lakes area and develop a high quality recreation area without being forced into accepting a land trade that is a bad deal for the public.

cc: Rep. Lincoln
Rep. Carney
Rep. Ivan
Rep. Finkelstein
Rep. Moyer
Rep. Zawacki
Rep. Hudson
Rep. Leman
Rep. Grussendorf

Sincerely


Evon Zerbetz
 PO Box 8943
 Ketchikan
 Alaska 99901

5/4/92

To: Honorable Cliff Davidson
 Chair, House Resources
 Alaska State Legislature
 State Capitol
 Juneau, AK 99801-1182

I am a lifelong Ketchikan resident and
 I am against the Leask Lakes-Cape Fox
 land trade deal.

The idea of trading old growth trees for stumps is
 outrageous. It is obvious that this is not an
 even trade. I feel that many of those Ketchikan
 residents who DO support the trade, have sentimental
 memories of the White River - as it was BEFORE
 being clearcut.

As tourism increases in Alaska, and as local
 population increases, it would be an excellent
 idea to keep some old growth accessible to people.
 Ketchikan recreation opportunities are limited on the
 island itself, but clearcutting as a means of
 opening up recreation IS NOT satisfactory.

We need to use some of our lands to say
 exactly this: Alaska is a great state and
 we are proud to live here. Leask Lakes are a
 chance to say this. Vote against the trade!
 Sincerely, Evon Zerbetz

May 5, 1992

Honorable Cliff Davidson
Chair, House Resources
Alaska State Legislature
State Capitol
Juneau, AK 99801-1182

Dear Mr. Davidson:

I am writing in regards to the state land swap proposal with Cape Fox Corp., of The Leask Lakes area with White River.

I have been a Ketchikan resident for 5 years. I have been employed full-time with SE Island School District as an itinerant music teacher. I cover the 20,000 square mile district in a floatplane on a daily basis. I see the logging on Prince of Wales and other locations.

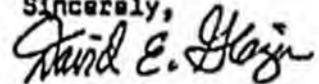
I enjoy living and working in SE Alaska. I feel extremely fortunate to be blessed with a wonderful job and the wonderful natural beauty around me.

I sincerely believe that the state should designate the Leask Lakes area as a protected state park. The advantages of preserving such beauty so close to Ketchikan show incredible wisdom and vision. Once it is gone, Ketchikan loses an important resource.

Please support legislation to preserve Leask Lakes and deny the land swap with Cape Fox Corp.

Thank you very much!

Sincerely,



David E. Glazier
614 Main St.
Ketchikan, AK 99901

OG:dg

cc: Rep. Lincoln
Rep. Zawacki
Rep. Finkelstein
Rep. Moyer
Rep. Grussendorf
Rep. Hudson
Rep. Carney
Rep. Ivan
Rep. Leman

To: Honorable Cliff Davidson
Chair, House Resource
Alaska State Legislature
State Capitol
Juneau, Alaska 99801-1182

From: Steve Heint
P.O. Box 3101
Ketchikan, Ak. 99901

I am a resident of Ketchikan and am strongly opposed to the Leask Lakes-Cape Fox land trade bill (SB 465) currently being considered. I feel that there is no benefit to the state or the public in this trade proposal. Why would I want to recreate in a clear-cut area? The White River area is not appealing to me as a recreational area. The economic gains are short term and benefit a handful of corporation shareholders but not the public. I strongly feel that this is a state give away. Please consider the implications of a trade of this nature and vote no.

cc: Rep. Lincoln
Rep. Carney
Rep. Ivan
Rep. Finkelstein
Rep. Moyer
Rep. Zawacki
Rep. Hudson
Rep. Leman
Rep. Crussendorf

Sincerely, Steve Heint

445 Front Street
Ketchikan, Ak. 99901
May 5, 1992

Honorable Cliff Davidson:
Chair, House Resources Committee

re: Cafe Fox Land Exchange HB578

Representative Davidson:

In Ketchikan this trade has been touted as an answer to our "Roaded Recreational Needs" and a road further up the island.

In fact what this bill does is:

-sell State owned recreational land at \$72/acre and buy privately owned clearcut land at an average of \$595/acre .
THIS IS NOT A GOOD DEAL FOR RECREATION

-spend \$2.5 million on a road upgrade for a road that the state doesn't want, that the borough government wants but does not have legal powers to maintain, and is NOT the preferred alternative of the recent DOT highway study, and cannot meet FHA highway standards.
THIS IS NOT A GOOD DEAL FOR A ROAD UP THE ISLAND

-designs clearcuts in a gem of a very accessible and beautiful area, puts a \$2.5 million road through and to these clearcuts, and calls the project a tourist attraction.
A CLEARCUT DOES NOT INCREASE THE TOURISM INDUSTRY

-decrease deer population by 71% on the state traded lands and claim it is being done to "further...environmental protection interests" (quote from the bill)
THIS BILL IS DEVASTATING TO WILDLIFE

This trade does not accomplish what it claims to, is not value for value, and benefits a very few people at a great cost to the state.

PLEASE OPPOSE HB578 and SB1 **465**

Sincerely yours,
Bill Rotecki

Bill Rotecki

PUBLIC OPINION MESSAGE

DEAR: REPRESENTATIVE DAVIDSON

NAME: CAROLYN STALLINGS

TITLE:

ADDRESS: 618 SUNSET DRIVE

CITY: KETCHIKAN, AK

PHONE: 247-4817

BILL NO: SB 465

SUBJECT: LAND EXCHANGE WITH CAPE FOX CORPORATION

MESSAGE: I AM NOT IN FAVOR OF THE TRADES WITH CAPE FOX. I STRONGLY SUPPORT A STATE PARK IN THE LEASK LAKES AREA, AND TRADING FOR MORE STUMPS DOES NOT MAKE GOOD ECONOMIC SENSE IN THE LONG RUN. PLEASE TREAT THIS BILL WITH GREAT, HOUGHTFUL CONSIDERATION.

POMID: 08160130

DATE: 92/04/14

TIME: 16:01:30

LIONAME: KETCHIKAN LIO

COPIES: SENATORS

ELIASON
POURCHOT

ZIP: 99901

PUBLIC OPINION MESSAGE

DEAR: REPRESENTATIVE DAVIDSON

NAME: JOAN E. KAUTZER

TITLE:

ADDRESS: LOT 1, UPPER GEORGE INLET, BOX 129

CITY: POINT BAKER

PHONE: N/R-

BILL NO:

SUBJECT: LEASK LAKES LAND TRADE

MESSAGE: AS A PROPERTY OWNER IN GEORGE INLET, I STRONGLY OPPOSE THIS CORRUP LAND TRADE. THE STATE WOULD ILL SERVE THE PUBLIC IN THIS UNBALANCED SWAP. LEASK LAKES SHOULD BE LEFT IN IT'S EXISTING OLD GROWTH SPLENDOR TO BEST PROVIDE FOR VIABLE RECREATIONAL OPPERTUNITY. DON'T ALLOW THIS PUBLIC THEFT TO OCCUR!

POMID: 15132802

DATE: 92/04/14

TIME: 13:28:02

LIONAME: PETERSBURG LIO

COPIES: REPRESENTATIVES SENATORS

BROWN	JONES
ELLIS	ELIASON
GRUSSENDORF	KERTTULA
NAVARRE	MENARD

PUBLIC OPINION MESSAGE

DEAR: REPRESENTATIVE DAVIDSON

NAME: ANDI SMITH-GUTHREAU
TITLE: CONCERNED CITIZEN
ADDRESS: P. O. BOX 8033
CITY: KETCHIKAN
PHONE: 225-8033

ZIP: 99901

CALL NO:
SUBJECT: LEASK LAKES-WHITE RIVER LAND TRADE PROPOSAL
MESSAGE: HELLO: I'M WRITING TO STATE MY OPPOSITION TO THE PROPOSED LAND SWAP
BETWEEN CAPE FOX AND THE STATE. I'M IN FAVOR OF THE LEASK LAKES AREA AS A STATE
PARK BUT NOT IF IT'S GOING TO BE LOGGED FIRST. IT WOULD DEFEAT THE PURPOSE OF
RECREATION/PARK AREA! THANKS!

POMID: 08164246
DATE: 92/03/25
TIME: 16:42:46
LOCATION: KETCHIKAN LIO

COPIES: REPRESENTATIVES SENATORS

BROWN	JONES
C.DAVIS	KERTTULA
ELLIS	POURCHOT
GRUSSENDORF	
MACKIE	
NAVARRE	

PUBLIC OPINION MESSAGE

DEAR: REPRESENTATIVE DAVIDSON

NAME: SCOTT M. GUTHREAU
TITLE: PRIVATE CITIZEN
ADDRESS: P. O. BOX 8033
CITY: KETCHIKAN
PHONE: 225-8033

ZIP: 99901

BILL NO:
SUBJECT: CAPE FOX CORPORATION LAND SWAP
MESSAGE: I STRONGLY OPPOSE THE LAND SWAP BUT DO SUPPORT A LEASK LAKE STATE
PARK.

POMID: 08164010
DATE: 92/03/25
TIME: 16:40:10
LOCATION: KETCHIKAN LIO

COPIES: REPRESENTATIVES SENATORS

C.DAVIS	JONES
ELLIS	KERTTULA
NAVARRE	POURCHOT
TAYLOR	

PUBLIC OPINION MESSAGE

PUBLIC OPINION MESSAGE

DEAR: REPRESENTATIVE DAVIDSON

DEAR: REPRESENTATIVE DAVIDSON

NAME: DAVID BEEBE
TITLE: COMMERCIAL FISHERMAN
ADDRESS: BOX 148
CITY: PETERSBURG
PHONE: 772-3808
BILL NO: HB 578

ZIP: 99833

NAME: JOSEPH D. SEBASTIAN
TITLE:
ADDRESS: BOX 1297
CITY: POINT BAKER
PHONE: N/R-
BILL NO: HB 578

ZIP: 99927

SUBJECT:
MESSAGE: PLEASE VOTE THIS TRADE DOWN! THE POOR CHOICE OF ROAD CONSTRUCTION THAT
IS ORIGINALLY CONDUCTED WILL SADDLE THE STATE WITH HUGE MAINTENANCE COSTS
AND, NOT TO MENTION THE SHAM OF "RECREATION" AND "WILDERNESS" VALUES THAT
EVERY TOURIST IS LURED TO ALASKA UPON.

SUBJECT: LAND EXCHANGE WITH CAPE FOX CORPORATION
MESSAGE: BE ADVISED THAT THE LEASK LAKES LAND TRADE IS UNWISE AND CORRUPT.
STATE WOULD INHERIT ROAD MAINTENANCE PROBLEMS, UNSTABLE SOILS, AND MANY
EXISTING SLIDES. HOW THIS LAND RIPOFF GOT THIS FAR IS A TESTIMENT TO IN-STATE
CORRUPTION. LEAST LAKES IS AN OPPORTUNITY FOR A FOUL STATE PARK AND TOURIST
DESTINATION.

POPID: 15155240
DATE: 92/04/13
TIME: 15:52:40
LIONAME: PETERSBURG LIO

POPID: 15152312
DATE: 92/04/13
TIME: 15:23:12
LIONAME: PETERSBURG LIO

COPIES: REPRESENTATIVES SENATORS

COPIES: REPRESENTATIVES SENATORS

BROWN	JONES
HACKIE	KERTTULA
NAVARRE	MENARD
TAYLOR	POURCHOT

BROWN	JONES
ELLIS	ELIASON
HACKIE	KERTTULA
NAVARRE	POURCHOT

PUBLIC OPINION MESSAGE

DEAR: REPRESENTATIVE DAVIDSON

NAME: JOSEPH D. SEBASTIAN

TITLE:

ADDRESS: BOX 1297

CITY: POINT BAKER

ZIP: 99927

PHONE: 772-4864

BILL NO: HB 578

SUBJECT: LAND EXCHANGE WITH CAPE FOX CORPORATION

MESSAGE: BE ADVISED THAT THE LEASK LAKES LAND TRADE IS UN-WISE AND CORRUPT. STATE WOULD INHERIT ROAD MAINTENANCE PROBLEMS, UNSTABLE SOILS, AND MANY SLIDINGSLIDES. HOW THIS LAND RIPOFF GOT THIS FAR IS A TESTIMENT TO IN-STATE CORRUPTION LEASK LAKES IS AN OPPORTUNITY FOR A FOWLSTATE PARK AND TOURIST DESTINATION.

POMID: 15151441

DATE: 92/04/13

TIME: 15:14:41

LOCATION: PETERSBURG LIO

COPIES: REPRESENTATIVES SENATORS

BROWN	JONES
ELLIS	KERTTULA
MACKIE	POURCHOT
NAVARRE	

PUBLIC OPINION MESSAGE

DEAR: REPRESENTATIVE DAVIDSON

NAME: DON CORNELIUS

TITLE:

ADDRESS: BOX 1727

CITY: PETERSBURG

ZIP: 99833

PHONE: 772-4864

BILL NO: HB 578

SUBJECT: LAND EXCHANGE WITH CAPE FOX CORPORATION

MESSAGE: PLEASE SAY NO TO LEASK LAKES LAND EXCHANGE. USE ALTERNATE ROUTE FOR ISLAND ROAD SYSTEM. LEASK LAKES WOULD MAKE A VERY POPULAR STATE PARK. WHITE RIVER ROAD SYSTEM IS A MAINTENANCE NIGHTMARE AND WOULD COST TOO MUCH TO MAINTAIN AND INCUR TOO MUCH LIABILITY.

POMID: 15145208

DATE: 92/04/13

TIME: 14:52:08

LOCATION: PETERSBURG LIO

COPIES: REPRESENTATIVES SENATORS

NAVARRE	JONES
FINKELSTEIN	KERTTULA
HUDSON	MENARD
IVAN	POURCHOT
LEMAN	
LINCOLN	
MOYER	
ZAWACKI	
TAYLOR	
C.DAVIS	

PUBLIC OPINION MESSAGE

DEAR: REPRESENTATIVE DAVIDSON

NAME: CONSTANCE GRIFFITH
 TITLE: CITIZEN
 ADDRESS: 2509 FOURTH AVENUE
 CITY: KETCHIKAN ZIP: 99901
 PHONE: 225-5069

BILL NO:

SUBJECT: STATE OF ALASKA - CAPE FOX LAND SWAP

MESSAGE: D.N.R. WANTS TO TRADE 2,500 ACRES AROUND LEASK LAKES FOR 4,300 ACRES OF LOGGED-OVER LANDS HEAVILY CLEARCUT. D.N.R. CLAIMS THE TRADE PROVIDES A RECREATION AREA FOR KETCHIKAN. LOGGED AREAS ARE NOT SUITABLE. LEASK LAKE STATE LANDS PROVIDE WILDLIFE, RECREATION AND FISH. A CENTURY IS REQUIRED TO RESTORE LOGGED AREAS WITH THESE VALUES. THE PROPOSED SWAP IS A HOAX. PLEASE DO NOT APPROVE THIS LAND SWAP.

POMID: 08145601

DATE: 92/03/04

TIME: 14:56:01

LIONAME: KETCHIKAN LIO

COPIES: REPRESENTATIVES SENATORS

BROWN	JONES
C.DAVIS	KERTTULA
GRUSSENDORF	POURCHOT
NAVARRE	

PUBLIC OPINION MESSAGE

DEAR: REPRESENTATIVE DAVIDSON

NAME: MRS. AMOS BURG
 TITLE:
 ADDRESS: PO BOX 20005
 CITY: JUNEAU, AK ZIP: 99802
 PHONE: N/R-

BILL NO: SB 465

SUBJECT: LAND EXCHANGE WITH CAPE FOX CORPORATION

MESSAGE: SB 465 IS UNCONSTITUTIONAL AND VOID. THE STATE CANNOT EXCHANGE PRIVATE PROPERTY FOR STATE PROPERTY, OTHERWISE THEY COULD TAKE AWAY YOUR HOME FOR STATE PROPERTY? EVEN BEFORE OUR U.S. CONSTITUTION WAS FORMED THERE HERE RESOLVES BY OUR FRAMERS THAT PRIVATE PROPERTY SHOULD NOT BE TOUCHED.

POMID: 00095553

DATE: 92/05/05

TIME: 09:55:53

LIONAME: JUNEAU LIO

COPIES: REPRESENTATIVES REPRESENTATIVES SENATORS

BAKER	BARNES	ADAMS
BOYER	BROWN	COLLINS
BRUCKMAN	CARNEY	COTTEN
CHOQUETTE	B.DAVIS	CRAFT
C.DAVIS	DONLEY	DUNCAN
ELLIS	FINDELSTEIN	ELIASON
FOSTER	GONZALES	FISCHER
GRUENBERG	GRUSSENDORF	FRANK
HANLEY	HUOSON	HALFORD
IVAN	JACKO	HOFFMAN
KOPONEN	KUBINA	JONES
LARSON	LEMAN	KERTTULA
LINCOLN	MACKIE	MENARD
MACLEAN	MARTIN	PEARCE
H.A.MILLER	H.W.MILLER	POURCHOT
MOYER	NAVARRE	RODEY
PARNELL	G.PHILLIPS	SHULTZ
R.PHILLIPS	SHARP	STURGULEWSKI
TAYLOR	ULMER	UEHLING
ZAHACKI		ZHAROFF

Dear Mr. Davidson

3/3/92

I am writing in regard to the Lake
Lake land swap.

I am ~~opposed~~ opposed to the swap for
several reasons but I'll only mention
the ones that are most important to myself.

- 1) I don't believe it is a "Fair" deal. It
sounds like the natives will make
several millions ^(Dollars) off the timber sales.
- 2) I don't believe the proposed White River road
improvements will be enough to make the road
safe for recreation i.e. Hanes.
- 3) I don't want to recreate on a clear cut!
I'd rather hike to the lake than drive
to a clear cut!
- 4) I don't want to see this land destroyed
like so many other areas have already
been.

Thank you for your time

Douglas L. Potter

Douglas L. Potter

423 Cedar St

Ketchikan AK 99901

3-19-92

Rep. Cliff Davidson,

Hello! I'm a resident of
Ketchikan Alaska. I am writing to say
I am opposed to the Leach Lake
land swap. I feel this trade is
grossly unfair. Forested land is
infinitely more valuable to me than
clear cut land with a road. Not
only is the White River Road area
logged but I feel there are no
guarantees that Cape Fox will be
able to keep its end of the deal to
make the road passable. Even if
they did are there state funds to
maintain it? How can we justify
maintenance of a 13 mile stretch of
road when we are cutting the education
budget? I don't consider a clear cut
a recreational opportunity and would
rather hike in to see the undisturbed
beauty of Leach Lake. I say no to the
trade! Carla Potter

423 Cedar
KITU, AK 99701

Box 3158
Ketchikan, Alaska 99901
May 3, 1992

Cliff Davidson
Chairman of House Resource Committee
Box V
Juneau, Alaska 99811

Re: Leask Lakes - White River Trade

Dear Mr. Davidson:

I have lived in Ketchikan since 1954. I have taught school for 15 years and am at present teaching school at Schoenbar Junior High. I am an outdoor recreator and am a regular promotor of outdoor recreation for my students.

I am concerned about the Leask Lakes - White River land trade for many reasons.

One: Leask Lakes should be turned into a National or State Park in order that safety regulations would be made. At present there are no rules or regulations in the Harriet Hunt and White River areas. The four wheelers nearly run over the cross-country skiers. They are fighting with each other. There needs to be designated areas so that both groups of people are happy. People are driving their cars out of control on the roads and teenagers go there to drink. The roads are barely maintained. The road to White River is a four wheel road and is not one that people would choose for a Sunday drive with the family. Every year we have totalled cars and people being hit by speeding cars. Someday something disastrous is going to happen to the lives of people.

Two: We need a National or State Park with maintained cross-country trails would enable more people to use the area. It would become a family area. There are people right now that won't take their children up there. If the Leask Lakes area is handled like Cape Fox's White River property or Ketchikan's Parks and Recreation, we will only have more of the same.

Three: Cape Fox's White River property is NOT the type of place one goes to look at the beauty of the countryside because it is nothing but a graveyard of barren stumps. It is very pretty in the winter because the

snow white washes the debris. Mountain biking in the summer is a dreadful sight. It's not the place I take any visitors from out of town unless they mountain bike and they always ask, "What happened out here?"

Four: From the dollar standpoint for the State of Alaska, I think it is a dangerous situation. Does the state want to get into selling land to corporate interests and let them exploit the major raw product we have out there? Is the State of Alaska going to benefit as much as Cape Fox?

Five: Ketchikan and the surrounding area needs a recreation area for the people that live here. Juneau has one, Anchorage and Fairbanks have one. We have nothing other than a few State Parks with walking paths or camping facilities. We need a RECREATION AREA. We need to ride bikes, cross country ski, hike, four wheel, fish, and camp. Our roads are so conglutated with cars and congestion that it is no longer a safe place to ride...so we need to think about our children and where they are going to recreate. We do have the water...but not all people do the water.

I appreciate your consideration in not supporting the Leask Lake, White River trade.

Sincerely,



Rosie Roppel

cc: Ben Guessendor
Georgianna Lincoln
Pat Carney
David Finkelstein
Bill Hudson
Ivan Ivan
Tom Moyar
Lorren LeMan
Jim Zewacky
Johnny Ellis (House Rules Committee)

6489 South Tongass Highway
Ketchikan, Alaska 99901
May 6, 1992

Honorable Cliff Davidson
Chair, House Resources
Alaska State Legislature
State Capitol
Juneau, Alaska 99801-1182

Dear Representative Davidson:

I am third generation Alaskan and a Ketchikan native who has spent quite a lot of time in and around the Leask Lakes area. This is one of the most beautiful, pristine, and untouched areas in Southeast Alaska. I strongly feel that a land trade with the Cape Fox Corporation would not only be detrimental to me, but also to my children and grandchildren. I strongly urge you to vote against this land trade.

Respectfully,

Mary Urquhart
Mary Urquhart

cc: Rep. Lincoln
Rep. Zawacki
Rep. Finkelstein
Rep. Moyer
Rep. Grussendorf
Rep. Hudson
Rep. Carney
Rep. Ivan
Rep. Leman

722 Park Avenue
Ketchikan, Alaska 99901
May 6, 1992

The Honorable Cliff Davidson
Chair, House Resources
Alaska State Legislature
State Capitol
Juneau, Alaska 99801-1182

Dear Representative Davidson:

I am a Ketchikan native and am strongly opposed to the Leask Lakes-Cape Fox Corp. land trade bill that passed out of the Senate last week. I am also concerned about the pressure that may be exerted on each and every one of you to make a deal rather than to consider this trade on its own merits. I urge you to consider this bill only on its own merits.

Sincerely,



Deidra Holum

cc: Rep. Lincoln
Rep. Zawacki
Rep. Finklestein
Rep. Moyer
Rep. Grussendorf
Rep. Hudson
Rep. Carney
Rep. Ivan
Rep. Leman

LoAnn Swanson
 PO Box 1161
 Ward Cove, Ak 99901
 6 May, 1992

Honorable Cliff Davidson
 Chairman, House Resources Committee
 Alaska State Legislature
 Juneau, Alaska 99801-1182

I am writing to encourage you to oppose the Leask Lakes Cape Fox Land Exchange (HB578). I have been a resident of this community for over 27 years, have raised my family here, and have spent many hours recreating in the places near to Ketchikan including the White River before it was logged. I am deeply concerned that you would consider trading this dessimated area for the Leask Lakes Drainage. I am not alone in this concern. Please note the following:

At the DNR hearing about the proposed exchange:

COMMUNITY	OPPOSED	FOR	NUETRAL
KETCHIKAN	36	26*	
SAXMAN	2	14	1
JUNEAU	2	6*	

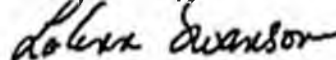
* (1 person spoke in support at both hearings)

Written Testimony submitted to DNR about the proposed exchange:
 OPPOSED 37 FOR 16

Furthermore, there was a petition circulated by a group called "The Leask Lakes State Park Committee" calling for the creation of a State Park in the Leask Lakes area. In response to that, the Cape Fox Corporation circulated a petition to oppose the State Park idea. It is my understanding that the petition for the park gathered about 800 signatures, and the one opposing the park received about 110 signatures.

Clearly this community does not "overwhelmingly support" trading stumps for trees. Please give this your careful consideration.

Sincerely,



LoAnn Swanson

cc:
 Rep. Lincoln
 Rep. Zawacki
 Rep. Finkelstein
 Rep. Moyer
 Speaker Grussendorf
 Rep. Hudson
 Rep. Ivan
 Rep. Carnoy
 Rep. Leman

6469 South Tongass Highway
Ketchikan, Alaska 99901
May 6, 1992

Honorable Cliff Davidson
Chair, House Resources
Alaska State Legislature
State Capitol
Juneau, Alaska 99801-1182

Dear Representative Davidson:

I am third generation Alaskan and a Ketchikan native who has spent quite a lot of time in and around the Leask Lakes area. This is one of the most beautiful, pristine, and untouched areas in Southeast Alaska. I strongly feel that a land trade with the Cape Fox Corporation would not only be detrimental to me, but also to my children and grandchildren. I strongly urge you to vote against this land trade.

Respectfully,


Mary Urquhart

cc: Rep. Lincoln
Rep. Zawacki
Rep. Finkelstein
Rep. Moyer
Rep. Grussendorf
Rep. Hudson
Rep. Carney
Rep. Ivan
Rep. Leman

Ralph C. Gregory

Box 4444 Ketchikan, Alaska 99901
(907)225-2432

Cliff Davidson, Chair
House Resources Committee

Dear Cliff:

I have observed the proposed land trade between Cape Fox and the State since its beginning concepts. While I worked for it in its early stages, I no longer feel that the community has a stake in its completion.

The Borough has neither the powers nor financial resources to maintain the road. It should not be assumed that future Assemblies will be obligated to expend local revenue in times when other serious and pressing problems face taxpayers to operate a dead end and expensive ROW.

The State DOT has determined that the proposed ROW would not be suitable for future development into a federal funded highway across the island. Actual development of a transportation link to Canada would be built over another route.

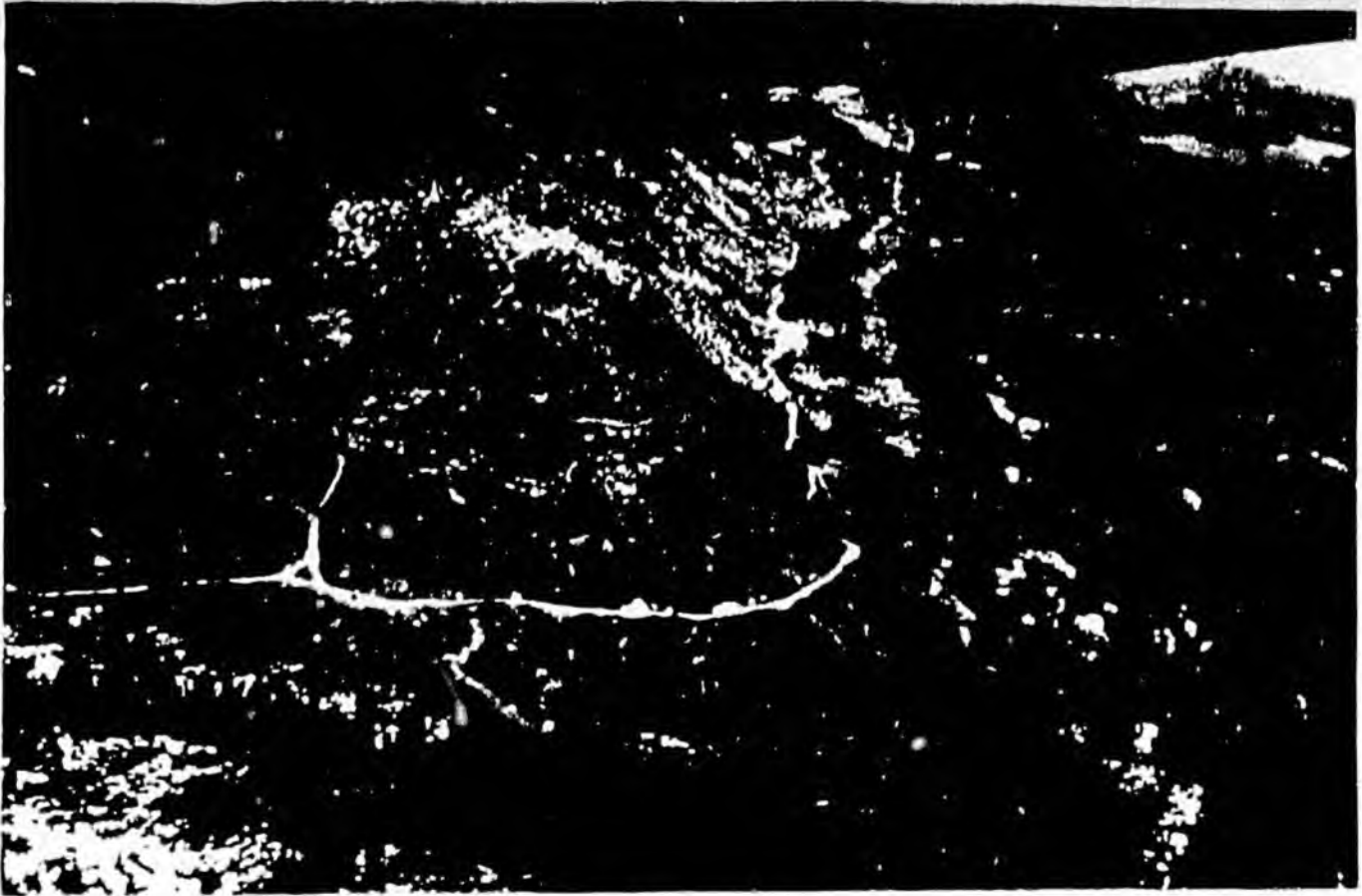
Logging close to Ketchikan is gradually eroding the outdoor experiences available to our residents and extension of clear cut logging in this area would not enhance the visitor industry, personal quality of life or long term employment in the Borough.

Personal regards,

Ralph C. Gregory

INDEX TO DOCUMENTS -- LEASK LAKES LAND TRADE

- DOCUMENT 1 -- COMPARATIVE PHOTOS
- DOCUMENT 2 -- ADF&G COMMENTS ON HABITAT IMPACTS
- DOCUMENT 3 -- ADF&G COMMENTS ON CAPE FOX CONSULTANT DEER REPORT
- DOCUMENT 4 -- LETTER FROM DNR'S CHIEF REVIEW APPRAISER REJECTING
THE APPRAISAL
- DOCUMENT 5 -- LETTER FROM INDEPENDENT REVIEW APPRAISER APPROVING
ONLY A SMALL PORTION OF THE APPRAISAL
- DOCUMENT 6 -- SUMMARY OF LITIGATION -- APPEAL OF DNR'S FINAL
DECISION (SIERRA CLUB LEGAL DEFENSE FUND)
- DOCUMENT 7 -- TONGASS CONSERVATION SOCIETY ISSUE PAPER
- DOCUMENT 8 -- BOROUGH RESOLUTION TO MAINTAIN ROADS "TO THE EXTENT
THE BOROUGH IS EMPOWERED."
- DOCUMENT 9 -- LETTER FROM KETCHIKAN CITY COUNCILMAN JEFF BUDD
- DOCUMENT 10 -- LETTER IN OPPOSITION, SOUTHEAST ALASKA
CONSERVATION COUNCIL
- DOCUMENT 11 -- LETTER IN OPPOSITION, ALASKA CENTER FOR THE
ENVIRONMENT
- DOCUMENT 12 -- ALTERNATIVES TO LEASK LAKES TRADE



White River Parcel, owned by Cape Fox Corporation



Leask Lakes Parcel, owned by the State of Alaska

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

SOUTHEAST REGIONAL OFFICE

Habitat Division

STEVE COWPER, GOVERNOR

P.O. BOX 20
DOUGLAS, ALASKA 99824-0020
PHONE: (907) 465-4290

November 13, 1990

Mr. Bruce Phelps
Planning Director
Ketchikan Gateway Borough
344 Front Street
Ketchikan, Alaska 99901

Dear Mr. Phelps:

Re: Habitat Impacts and Proposed White River/Leask Lakes Land Trade

In the Ketchikan Community Survey completed by the McDowell Group in September 1990, "Consideration of wildlife and fisheries habitat impacts in proposed land exchanges was the most important value overall," as expressed by a representative sample of Ketchikan residents.

During the community workshop held on November 3, 1990, these values were once again reiterated. In a paired comparison analysis of important cultural and natural resource values within the study area, the combined effort of many of the workshop participants found that the highest priority goals of the community were to:

- (1) "Provide roaded recreation." and
- (2) "Protect and maintain wildlife species, abundance, diversity, and habitats."

At various times during the past year, Department of Fish and Game staff have informed Borough and Cape Fox personnel that the proposed White River/Leask Lakes land trade would be counterproductive to the goals of fish and wildlife habitat protection within the recreational study area. For example, on 2-12-90, staff transmitted comments to you that the proposed trade, "would result in a net loss to both high quality habitats and recreational opportunities. This trade would have irrevocable consequences to those types of habitats which will become the most limited in future years."

Department staff have informed me that although they had made the proposed land trade their highest priority, and requested close coordination and involvement during each stage of the Borough/Cape Fox planning process, their concerns have not been addressed.

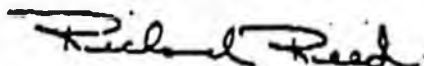
Unfortunately, what has emerged as a result is a product which has significant technical flaws regarding the wildlife and habitat information which is now being publicly presented by the Ketchikan Gateway Borough and the Cape Fox Corporation. Although a logging engineer employed by Cape Fox informally discussed certain aspects of some wildlife species with department staff, the Borough has not made available to us sufficient opportunities to review and participate in the various stages of development of the materials which are being presented.

Consequently, the Borough Planning Department is now displaying "critical habitat" maps for wildlife which are technically incorrect.

This deficiency needs to be remedied and we are willing and available to assist you in this endeavor. Furthermore, when discussing the wildlife related impacts, we would appreciate it if you would instead report that the trade is expected to result in a significant net loss of important habitat values.

For additional information concerning our review of the proposed land trade and options for roaded recreational opportunities in the Ketchikan area, please refer to the enclosed comments which we hope you find useful.

Sincerely,



Richard Reed
Regional Supervisor

enclosure

cc: Mayor Bartholomew
Borough Assembly Members
Frank Rue, ADF&G
Jack Gustafson, ADF&G
Andy Pekovich, ADNR
Mike McKinnon, ADOT/PF

a:leask.ltr

COMMENTS REGARDING THE PROPOSED LEASK LAKES/WHITE RIVER LAND TRADE

ALASKA DEPARTMENT OF FISH AND GAME

NOVEMBER 1990

The Department of Fish and Game has concluded that there are serious problems with the proposed Leask Lakes/White River land trade. We believe that this trade would result in a net loss to both wildlife habitat values and future recreational opportunities. Additionally, further evaluation by qualified transportation experts and other specialists may reveal that a trade could impede the timely extension of a transportation link extending into this area. With proper planning, retention of the Leask Lakes drainage in state ownership could be beneficial to future habitat and recreational values, while concurrently expediting a road extension and the eventual establishment of a transportation corridor. A more complete explanation of our concerns follows:

1. THE TRADE WILL RESULT IN A SIGNIFICANT NET LOSS OF IMPORTANT HABITAT VALUES.

Over the past year, Alaska Department of Fish and Game biologists have met with Forest Service biologists to discuss ways of harvesting timber on southern Revilla Island while attempting to maintain healthy wildlife populations. We have identified the protection of a core area including the Naha River drainage, the George Inlet Saltchuck, and the Leask Lakes drainage as vital to this objective. Most of the lands around this core area will be intensively logged, and the area which includes Leask Lakes will become essential in attempting to maintain the future integrity of wildlife populations on southern Revilla Island, in addition to striving for viable and well distributed representations of wildlife species in southern southeast.

There is a greater diversity of species at Leask Lakes, along with a more complex food chain than exists at the White River. Species which have suitable habitat in the Leask Lakes tract but not in the White River drainage include sockeye salmon, summer run coho salmon, trumpeter swans, loons, Vancouver Canada geese, bufflehead, goldeneye, greater/lesser scaup, hooded mergansers, goshawks, marten, some of the owl species, and possibly others. A half-dozen or more species could be lost from the ecosystem at Leask Lakes if the land trade plan is implemented, and the present abundance of many other species could be greatly reduced. For example, Leask Lakes presently provides suitable habitat for two (swans, goshawks) regionally identified sensitive species, while the White River does not. Consequently, while additional logging in the White River would not affect the habitat of presently identified sensitive species, we can anticipate that both sensitive species could be permanently lost from the Leask Lakes area

under the land trade proposal. Additionally, other wildlife which may disappear from the Leask Lakes tract with the heavy fragmentation and greatly expanded access proposed by the land trade could include some of the species of owls, marten, wolves, and possibly others.

There are three important factors which contribute to the relatively high level of wildlife productivity in the Leask Lakes area compared to the White River. These are (1) the presence of a lake system, (2) lack of previous habitat fragmentation/loss and, (3) geographic juxtaposition in relation to other productive habitats. The Leask Lakes tract is strategically located adjacent to both the Naha and the George Inlet Saltchuck. Some species require large blocks of old growth, and their viability can be much better provided for in the current existing land ownership pattern. Important habitats and suitable connections to other unfragmented areas can be designed if the state retains ownership of the Leask Lakes tract. A trade would severely cripple our planning efforts to maintain viewable, harvestable, and viable population levels of some wildlife species near Ketchikan, especially for wildlife within proximity to an accessible road system.

2. THE TRADE RESULTS IN A NET LOSS TO HIGH QUALITY RECREATIONAL OPPORTUNITIES.

Staff has concluded that there is a much wider diversity, higher quality and greater abundance of future recreational opportunities in the state-owned Leask Lakes tract than on Cape Fox-owned White River lands. Local residents have promoted a plan to keep the Leask Lakes tract under state ownership and provide roaded access to the area for the purpose of opening-up this part of George Inlet for recreational use. They have stated that visitors could pursue a variety of activities including hunting, fishing, camping, hiking, sight-seeing, natural history education, photography, non-motorized boating/canoeing, and winter sports such as ice-skating, ice-fishing, and cross country skiing. A lands committee composed of area residents rated the recreational values of the Leask Lakes area equal to or higher than those for the White River. Department of Fish and Game staff who have spent significant amounts of time in both areas rate the Leask Lakes as having a much greater value in each recreational category than the White River.

It seems, for example, that the amount and quality of sport fishing opportunities at the White River have been somewhat exaggerated. While there are sometimes large runs of pink salmon into the White River, few sportfishermen pursue pinks after they have entered their spawning streams. Other species of fish occur in the White River, but are not abundant. In

the single escapement survey conducted for steelhead, for example, only 22 fish were observed. At this point, biologists are unsure if a viable steelhead season would be possible on the White River if the road were opened for public access. Additionally, some habitat impairment has occurred as a result of the logging activities which have taken place in the White River, particularly where clearcutting has fallen the trees along both streambanks. Donald Siedelman, a fisheries biologist contracting for Cape Fox, concluded that, "The resultant upland activities (logging) have now made the drainage a "temperature sensitive" river system. During above average warm weather conditions, the stream warms creating marginal salmonid habitat...This occurred for the first time in the White River in 1986." It should also be noted that there is a significant opportunity for recreational fisheries enhancement projects in the Leask Lakes area, while the White River contains no lakes and offers few options to improve its recreational fishing opportunities.

3. THE COASTAL ROAD ALIGNMENT MAY BE UNSUITABLE.

There could be major problems with eventually attaining NEPA approval for a connective road along the alignment proposed by Cape Fox. As early as 1985 the Department expressed objections to a coastal road alignment along George Inlet because of environmental concerns. No such environmental problems have been identified on the shorter inland route, which has been preliminarily supported by this department as the location of any transportation link. In addition, in a position paper last year, the Forest Service suggested the White River alignment would not be a usable road location for recreational or through-traffic purposes. Safety and engineering constraints have been identified which they say will be very expensive and difficult to overcome. In the Forest Service position statement, it was also recommended that several miles of road be relocated.

4. THE PROPOSED TRADE DOES NOT APPEAR TO BE VALUE FOR VALUE.

At present, the land trade proposal indicates Cape Fox Corporation would trade approximately 300 acres of commercially important timber in the White River corridor for approximately 1200 acres of commercially important timber in the Leask Lakes tract. An estimated 60 acres of Cape Fox timber along the White River corridor could be in legislatively protected riparian buffers and unavailable for logging. Consequently, it appears Cape Fox would receive about 6.5 acres of commercially marketable timber for each acre they traded to the state. Depending upon market conditions and other factors, the timber values alone appear to be significantly different, in addition a trade of disproportionate timber volume types could result in a

disproportionate loss of wildlife habitat. Cape Fox contends that the fish and wildlife related recreational values of the White River compensate for this difference in values. However, the proposal does not take into account the habitat, and recreational values which would be lost in the Leask Lakes area if the trade were implemented.

5. IF CAPE FOX ACQUIRED THE LEASK LAKES LAND, IT IS UNLIKELY THEIR FUTURE MANAGEMENT WOULD BE COMPATIBLE WITH THE COMMUNITY'S RECREATIONAL GOALS.

Once Cape Fox became a major land-owner in the Leask Lakes area, their land management policies could complicate or confound recreational planning efforts of adjacent lands and be in conflict with the objectives of providing suitable, unencumbered recreational opportunities for the community. Additionally, maintenance of wildlife habitat was the number one major community concern in the McDowell survey, but the diversity and abundance of wildlife in the Leask Lakes tract would be severely curtailed due to habitat losses and the roads Cape Fox would have to construct to access timber.

6. ACCEPTABLE ALTERNATIVES ARE AVAILABLE TO TRADE OTHER PUBLIC LANDS FOR THE WHITE RIVER.

Although the Department of Fish and Game has serious concerns with a trade for the state-owned Leask Lakes tract, we see less problems with trading other publicly-owned lands for the White River. One such area which has been identified for trade and which is acceptable involves borough-owned lands in the Whipple Creek drainage. A Whipple Creek trade does not result in a net loss to important habitat and recreational values, nor does it have the other problems identified with the Leask Lakes trade. Additionally, we believe other areas, such as at Tolstoi Bay or Shelter Cove, continue to be viable options for trading for the White River.

In summary, we do not feel the proposed land trade would meet the highest priority goals of the November 3 Community Workshop which were to "provide roaded recreation" and to "protect and maintain wildlife species, abundance, diversity and habitats."

COMMENTS REGARDING THE PROPOSED LEASK LAKES/WHITE RIVER LAND TRADE

ALASKA DEPARTMENT OF FISH AND GAME

NOVEMBER 1990

The Department of Fish and Game has concluded that there are serious problems with the proposed Leask Lakes/White River land trade. We believe that this trade would result in a net loss to both wildlife habitat values and future recreational opportunities. Additionally, further evaluation by qualified transportation experts and other specialists may reveal that a trade could impede the timely extension of a transportation link extending into this area. With proper planning, retention of the Leask Lakes drainage in state ownership could be beneficial to future habitat and recreational values, while concurrently expediting a road extension and the eventual establishment of a transportation corridor. A more complete explanation of our concerns follows:

1. THE TRADE WILL RESULT IN A SIGNIFICANT NET LOSS OF IMPORTANT HABITAT VALUES.

Over the past year, Alaska Department of Fish and Game biologists have met with Forest Service biologists to discuss ways of harvesting timber on southern Revilla Island while attempting to maintain healthy wildlife populations. We have identified the protection of a core area including the Naha River drainage, the George Inlet Saltchuck, and the Leask Lakes drainage as vital to this objective. Most of the lands around this core area will be intensively logged, and the area which includes Leask Lakes will become essential in attempting to maintain the future integrity of wildlife populations on southern Revilla Island, in addition to striving for viable and well distributed representations of wildlife species in southern southeast.

There is a greater diversity of species at Leask Lakes, along with a more complex food chain than exists at the White River. Species which have suitable habitat in the Leask Lakes tract but not in the White River drainage include sockeye salmon, summer run coho salmon, trumpeter swans, loons, Vancouver Canada geese, bufflehead, goldeneye, greater/lesser scaup, hooded mergansers, goshawks, marten, some of the owl species, and possibly others. A half-dozen or more species could be lost from the ecosystem at Leask Lakes if the land trade plan is implemented, and the present abundance of many other species could be greatly reduced. For example, Leask Lakes presently provides suitable habitat for two (swans, goshawks) regionally identified sensitive species, while the White River does not. Consequently, while additional logging in the White River would not affect the habitat of presently identified sensitive species, we can anticipate that both sensitive species could be permanently lost from the Leask Lakes area

aff have informed me that although they had made the
trade their highest priority, and requested close
and involvement during each stage of the
Fox planning process, their concerns have not been

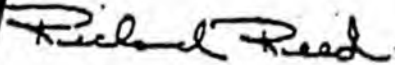
ly, what has emerged as a result is a product which
significant technical flaws regarding the wildlife and
information which is now being publicly presented by t
Gateway Borough and the Cape Fox Corporation. Altho
engineer employed by Cape Fox informally discussed
aspects of some wildlife species with department staf
ugh has not made available to us sufficient opportun
w and participate in the various stages of developme
aterials which are being presented.

ently, the Borough Planning Department is now displa
ical habitat" maps for wildlife which are technically
ect.

deficiency needs to be remedied and we are willing a
able to assist you in this endeavor. Furthermore, v
ussing the wildlife related impacts, we would apprec
ou would instead report that the trade is expected t
a significant net loss of important habitat values.

t additional information concerning our review of the
nd trade and options for roaded recreational opportu
e Ketchikan area, please refer to the enclosed comme
a hope you find useful.

Sincerely,



Richard Reed
Regional Supervisor

enclosure

cc: Mayor Bartholomew
Borough Assembly Members
Frank Rue, ADF&G
Jack Gustafson, ADF&G
Andy Pekovich, ADNR
Mike McKinnon, ADOT/PF

a:leask.ltr

the single escapement survey conducted for steelhead, for example, only 22 fish were observed. At this point, biologists are unsure if a viable steelhead season would be possible on the White River if the road were opened for public access. Additionally, some habitat impairment has occurred as a result of the logging activities which have taken place in the White River, particularly where clearcutting has fallen the trees along both streambanks. Donald Siedelman, a fisheries biologist contracting for Cape Fox, concluded that, "The resultant upland activities (logging) have now made the drainage a "temperature sensitive" river system. During above average warm weather conditions, the stream warms creating marginal salmonid habitat...This occurred for the first time in the White River in 1986." It should also be noted that there is a significant opportunity for recreational fisheries enhancement projects in the Leask Lakes area, while the White River contains no lakes and offers few options to improve its recreational fishing opportunities.

3. THE COASTAL ROAD ALIGNMENT MAY BE UNSUITABLE.

There could be major problems with eventually attaining NEPA approval for a connective road along the alignment proposed by Cape Fox. As early as 1985 the Department expressed objections to a coastal road alignment along George Inlet because of environmental concerns. No such environmental problems have been identified on the shorter inland route, which has been preliminarily supported by this department as the location of any transportation link. In addition, in a position paper last year, the Forest Service suggested the White River alignment would not be a usable road location for recreational or through-traffic purposes. Safety and engineering constraints have been identified which they say will be very expensive and difficult to overcome. In the Forest Service position statement, it was also recommended that several miles of road be relocated.

4. THE PROPOSED TRADE DOES NOT APPEAR TO BE VALUE FOR VALUE.

At present, the land trade proposal indicates Cape Fox Corporation would trade approximately 300 acres of commercially important timber in the White River corridor for approximately 1200 acres of commercially important timber in the Leask Lakes tract. An estimated 60 acres of Cape Fox timber along the White River corridor could be in legislatively protected riparian buffers and unavailable for logging. Consequently, it appears Cape Fox would receive about 6.5 acres of commercially marketable timber for each acre they traded to the state. Depending upon market conditions and other factors, the timber values alone appear to be significantly different, in addition a trade of disproportionate timber volume types could result in a

disproportionate loss of wildlife habitat. Cape Fox contends that the fish and wildlife related recreational values of the White River compensate for this difference in values. However, the proposal does not take into account the habitat, and recreational values which would be lost in the Leask Lakes area if the trade were implemented.

5. IF CAPE FOX ACQUIRED THE LEASK LAKES LAND, IT IS UNLIKELY THEIR FUTURE MANAGEMENT WOULD BE COMPATIBLE WITH THE COMMUNITY'S RECREATIONAL GOALS.

Once Cape Fox became a major land-owner in the Leask Lakes area, their land management policies could complicate or confound recreational planning efforts of adjacent lands and be in conflict with the objectives of providing suitable unencumbered recreational opportunities for the community. Additionally, maintenance of wildlife habitat was the number one major community concern in the McDowell survey, but the diversity and abundance of wildlife in the Leask Lakes tract would be severely curtailed due to habitat losses and the roads Cape Fox would have to construct to access timber.

6. ACCEPTABLE ALTERNATIVES ARE AVAILABLE TO TRADE OTHER PUBLIC LANDS FOR THE WHITE RIVER.

Although the Department of Fish and Game has serious concerns with a trade for the state-owned Leask Lakes tract, we see less problems with trading other publicly-owned lands for the White River. One such area which has been identified for trade and which is acceptable involves borough-owned lands in the Whipple Creek drainage. A Whipple Creek trade does not result in a net loss to important habitat and recreational values, nor does it have the other problems identified with the Leask Lakes trade. Additionally, we believe other areas, such as at Tolstoi Bay or Shelter Cove, continue to be viable options for trading for the White River.

In summary, we do not feel the proposed land trade would meet the highest priority goals of the November 3 Community Workshop which were to "provide roaded recreation" and to "protect and maintain wildlife species, abundance, diversity and habitats."

MEMORANDUM

State of Alaska
Department of Fish and Game

TO: Dave Anderson
Regional Supervisor
Wildlife Conservation
Juneau

DATE: October 8, 1991

FILE NO:

FROM: Matthew Kirchhoff *MK*
Deer Research Biologist
Douglas

TELEPHONE NO: 465-4265

SUBJECT: ANI's deer habitat evaluation

Following is my review of the 1 August 1991 report which America North prepared for Cape Fox Corporation regarding the proposed Leask Lakes - White River land exchange. The report evaluates the effect of the exchange on important deer habitat, and by inference, on hunting and viewing opportunities.

General Comments:

To their credit, the authors acknowledge that this report does not constitute a scientific study, noting that no quantitative data were collected or analyzed, and that the conclusions are based on literature review, consultation with experts, and qualitative field review. Their literature review was fair, and their field observations generally consistent with what I have seen myself in southeast Alaska. I have reservations, however, about the lack of clear methodology, and the simplistic analysis relied upon in this report.

The authors have chosen to illustrate the impact of this land exchange in terms of percent of "important" winter habitat logged. What "important" habitat means, however, is unclear. Although a variety of factors were vaguely considered in mapping these acres, it would be impossible to replicate the results on the basis of information provided. More importantly, there is no connection between acres of "important" habitat lost and the resultant impact on the deer population. To draw meaningful conclusions about likely effects on deer hunting and viewing requires that we know (a) how deer populations will change, and (b) how that change will affect hunting and viewing. The authors acknowledge these factors were not addressed in their evaluation. Their uncertainty is reflected by their range of conclusions:

- 1) "with adherence to the following recommendations, ANI believes deer populations in the Leask Lake area could support limited hunting and viewing." (page 21)
- 2) "Adherence to the six recommendations above, will minimize impacts from the proposal, but will not eliminate the possibility that deer numbers may not always be sufficient to meet hunting and recreational viewing demands" (page 22)
- 3) "(neither alternative) can assure adequate numbers of deer will remain for hunting and viewing after moderate to severe winters (page 22).

A more useful effects analysis should consider *all* acres which contribute to deer carrying capacity, and express those effects in terms of changes to the deer population. In my earlier memo to you (dated 17 September, 1991), I used the Forest Service model to generate current and future deer carrying capacity estimates for the Leask Lakes study area. If logging proceeds according to plan, the model predicts that the deer population will decline by 68% (134 deer to 43 deer) over the next 40 years. Whether or not the 43 deer that remain can still provide satisfactory hunting and viewing is a more subjective question. I personally doubt that having 43 deer in an area that large will satisfy significant hunting or viewing demand.

Page-specific Comments:

Page 1. Cape Fox Corporation staff apparently defined "critical" habitat as "sites containing high-volume timber no more than one-quarter to one-half mile from saltwater". Their definition reflects the mistaken impression that the highest value habitat is adjacent to the beach. Extensive winter deer surveys and radio-telemetry data have revealed this is not the case. The current Forest Service model places no value on proximity to the beach.

Page 1. ANI defines "critical" habitat as "those areas capable of supporting deer in moderate to severe winter based on parameters identified in the deer habitat model". Without specifically saying how many deer can be supported, what constitutes "moderate to severe winters", or precisely how parameters were "considered", the term has limited utility. Are we to believe if none of those 788 "important" acres are cut there will be no impact on deer, or alternatively, if all 788 "important" acres are logged, we will lose all our deer? To be meaningful, one needs to know how saving or logging various amounts of important habitat will affect deer.

Page 1. The report states: "ANI based this determination (of critical habitat) on application of the habitat capability model for Sitka black-tailed deer in southeast Alaska: Winter Habitat (USDA Forest Service, 1991), and other published scientific literature". This is misleading. The Forest Service model calculates the number of deer a given land unit can support based on specific characteristics of the habitat. All forested habitat has some value. The model can not, and does not, identify "important" or "critical" habitat.

Pages 1-2. Authors state, "Significant parameters for deer winter range during deep snow conditions, which are noted in the model and applied to the study area are: (1) elevation (primarily below 800 feet), (2) aspects with southern exposure (136-225 degrees), (3) timber volume (20,000-30,000 bf/acre), (3) snow depth (less than 12 inches), (4) presence of predators..., and (5) minimum habitat area (200-1,000 acre blocks minimum)". The GIS database they used did not differentiate habitat by aspect or elevation, and no data on canopy cover or snow depth (other than the acres they visited) exists. A less ambiguous procedure for identifying "important", "intermediate", and "critical" deer winter range is needed.

Page 2. Schoen and Kirchhoff (1985) are cited as establishing that proximity to coastal climate is important to deer. Quite the contrary, in this and other papers we try to dispel the notion that proximity to coast is important (e.g., see their discussion).

Page 6. I sense an undercurrent of resentment towards ADF&G for lack of cooperation on this project. From my experience that is unwarranted. I had very cooperative and productive discussions with ANI biologists and freely gave advice and technical information. Given constraints of time (2 days afield) and manpower (2-4 persons), I advised it would be impossible to quantitatively measure forage abundance, snow conditions, deer populations, or habitat preference over any meaningful area. They acknowledged this. Alternatively, I suggested evaluating habitat capability using the Forest Service model in conjunction with aerial photos or GIS inventory data. Then, they could spot check selected stands in the field to verify that various habitats had been correctly classified. The field stage could be done anytime during the late spring, summer or early fall. I remain willing to help ANI and Cape Fox with this aspect of the work.

Pages 9-16. This section reviews existing literature on deer/habitat relationships and also includes some results of the field reconnaissance. The review is well done, and the observations on deer use appear consistent with established deer/habitat relationships.

Page 17. The Forest Service's habitat capability model recognizes that all acres contribute to deer carrying capacity. The model calculates how many deer each acre can support, based on habitat attributes (e.g., aspect, elevation, volume class, species composition), winter severity, and predation risk. In

contrast, the analysis used in this report assumes each acre either has, or does not have value. In moderate to severe winters, 788 acres are assumed to have value (i.e., are important), while the remaining 4,612 acres lack value. Subsequent discussion of the impact of the land trade on deer center how many of these 788 valuable acres will or will not be cut. This analysis misses the fact that many other acres, with many deer on them, will be affected by this logging plan.

Page 22. Although I obviously feel the methodology and analysis used in the report could have been improved, I agree with the report's conclusion, stated in the last paragraph:

"While neither (of the) alternatives can assure adequate numbers of deer will remain for hunting and recreational viewing after moderate to severe winters (moderate being the norm), they do retain more critical habitat and other commercial volume forest than originally proposed....(and) should support more deer than the original alternative presented."

Both the ANI report and my own analysis indicate that deer will decline significantly-- probably by 50% or more. We can disagree about the precise extent of those losses, and the best means used to reach those estimates, but the qualitative results are the same. There should be no question that if this logging plan is implemented, there will long-lasting adverse impacts on the deer in this area.

STATE OF ALASKA

WALTER J. HICKEL, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF LAND.

LAND & REBOURCES SECTION
3601 C STREET
P.O. BOX 187006
ANCHORAGE, ALASKA 99518-7006
PHONE: (907) 762-2600

April 25, 1992

Senator Pat Pourchot
Room 516, State Capitol
Juneau, Alaska 99801-1182Re: Cape Fox Exchange Appraisal
Karabelnikof & Associates, Appraisers

Dear Senator Pourchot,

After receiving the latest in a series of revisions to the Cape Fox exchange appraisal it is my carefully considered conclusion that I am unable to recommend use of this report by the department in the exchange process. AS 38.05.020 (a) requires that..."The land, interest in land, and other consideration which the state receives in an exchange made under this chapter shall be equal to or exceed the appraised fair market value of land, interest in land or property exchanged by the state;..." After careful review of this appraisal it is my opinion that the report fails to lead the reader to a clear convincing conclusion that the resulting values represent what could be defended as "fair market value."

I received what was presented as a "draft" appraisal report from Karabelnikof & Associates in January, 1991. Very logically, Mr. Karabelnikof was concerned about the size of the report, how it was organized and preferred to present it to me as a draft, rather than as a final, in the interest of obtaining my in-put and comments on an informal basis. During the first reading it was immediately obvious that the report did not follow what could be loosely described as a standard appraisal format or process. It was ponderous, containing some 300 pages subdivided into nine sections, much more academic in tone than the usual report and extremely technical in terms of statistical processes and applications.

In earlier sections (I through V) the reader is lead through a general analysis of the appraisal problem and a very thorough (and commendable) description of the attributes of the five Cape Fox parcels and the three state parcels. Section VI is the beginning of the valuation methodology. Here the appraisers utilize a stepwise forward regression analysis to determine statistically what needs to be done to adjust eight of what are considered by the appraisers to be the most comparable market sales in southeast Alaska to an indication of value for our subject properties. Some fifteen

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possible attributes were selected by the appraisers and each of the eight comparables were statistically tested to determine the extent, if any, each attribute affected the transaction. It is at this point (Section VI) that the ability of the appraisers to explain the statistical process clearly and concisely, in terms that can be understood by any reader, fails. An explanation of the regression process, extremely vague to anyone not familiar with statistics in general, and regression in particular, is presented along with descriptive statistics (in chart form) and scattergrams in Appendix E in the back of the report. I believe it is reasonable to say that the explanation I have just offered regarding what is done in Appendix E is considerably more clear than what would be obtained by a complete reading of what is presented in that appendix.

As a result of this statistical analysis it was determined that five of the thirteen attributes tested were significant enough to warrant consideration. Adjustments were made to each of the eight sales for percent of forested area, date of sale, percent of slope, presence or absence of a stream and for percent forested. Application of adjustments necessary in the case of each sale was completed and resulted in the indicated value for each of the eight subject properties seen on page E-24 of the report.

The appraisers then proceed with valuing the eight subject parcels using a market comparable program called MKTCOMP. It is implied in the report that MKTCOMP is a second method of valuation when, in fact, the process essentially utilizes the same adjustments and sales from the regression analysis. In appraisal practice it is common to utilize as many methods of valuation as possible to support a value, then to correlate the different methods and reach a conclusion (e.g. the market, cost and income approaches used in appraising improved, income producing properties.). The only significant difference between the two programs in this instance appears to be that the regression analysis utilizes eight sales to predict value while MKTCOMP uses five. A comparison of values predicted by regression, on pages VI-10 of the report and by MKTCOMP on page VII-2, demonstrates that the values are very close; not apparently as a result of a meaningfully different process but more due to identical adjustments having being applied to essentially the same sales.

Following my review of the original draft I expressed my concern to the appraisers over the inability of the report to convey clearly and concisely, in language any reader of average intelligence could understand, how the value was determined in this report. In addition to not being lead to a conclusion of value that I would be comfortable recommending my department approve, I made it abundantly clear to the appraisers that this was a document

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that would be subject to a public hearing process and close public scrutiny. The report needed to be written to accommodate that use. This is not an unreasonable requirement. It is consistent with our department appraisal instructions, to which this report was subject by contract, and to standards of professional practice with which these appraisers are familiar and to which they are professionally obligated.

In addition to the inability of the report to clearly and understandably explain its valuation process a number of procedural and technical questions have arisen over the several months that have passed since receipt of the first draft. These are as follows:

In particular, there is considerable debate in the appraisal community regarding the propriety of using such a small market data set (eight sales in the regression analysis) to determine market value statistically. The debate appears to be industry wide and not confined to this particular appraisal project. The issue does not involve questioning the use of statistical analysis as an appraisal tool. The method is generally accepted and widely used, particularly in mass appraisal applications such as assessing. The debate, in cases such as we have here, centers on the issue of small data sets; specifically, on the ability of small data sets to meaningfully forecast value using a statistical program.

From the project outset, particularly in view of the procedural debate, it would have appeared appropriate that the results of the MKTCOMP process be placed against another method of valuation as a check of the process. It is my understanding that this was suggested early on in the appraisal process by one member of the appraisal team but the advice was not taken. On several occasions in the review process I suggested the addition of a standard market approach as a check to support the MKTCOMP conclusions. A review of the appraisal was contracted for in February, 1992 by Karabelnikof & Associates. Mr. Dan Swango, Phd, MAI, CRE, SREA, of Swango Real Estate Counseling and Valuation, of Tucson, Arizona, also recommended the inclusion of a second approach. The appraisal team rejected this advice but did prepare a brief report as evidence for Dr. Swango that a standard simulation (market) approach would produce value conclusions that would sufficiently support MKTCOMP. (Dr. Swango also voiced concern to the appraisal team over the small data set issue.) Dr. Lynn Woodward, MAI, SREA, of Lynn Woodward and Associates, Sarasota, Florida, was hired in on April 10, 1992 by Karabelnikof & Associates to complete another review the report. It was also his recommendation that a standard

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market approach be added to the appraisal. On April 16 I received a report entitled "Value Estimate Using Traditional Judgmental Approach". This represented the long suggested market approach being offered as support for the statistical valuation. It was my conclusion that this document represented little more than the hastily prepared report offered to Dr. Swango back in March. Hardly what could be accepted, by any standard, as a valid, well supported appraisal.

Ignoring the debate over procedure, and the lack of a credible alternative approach to support the appraisers statistical conclusion, the results of the regression process itself raise some concern. It is obvious to an appraiser who has been involved in appraising in Alaska in general, and southeast Alaska in particular, for twenty years that many of the conclusions reached by the statistical analysis fly in the face of what is generally known of the Alaska real estate market.

It is the conclusion of the regression analysis that the most significant adjustment the program has identified is "% Open Space". This refers to the percentage of natural occurring open space, as opposed to clearing or clear cut. This factor has never manifested itself, to my knowledge, in any other appraisal. The adjustment is notably inexplicable, especially as it is apparently the most significant attribute identified by the program from the fifteen attributes analyzed.

It was the conclusion of the regression analysis that a negative adjustment was necessary to account for falling prices in that area of the market over recent years. There is no such evidence available, outside this report, to support that value of southeast large acreage parcels are experiencing a decline. To the contrary, a resale of one of the sales included in the report (Sale No. 97) has occurred which indicates a significant value increase between 1984 and late 1991. This parcel is not logged and heavily timbered and it must be considered that current timber prices may have contributed to the value increase.

It was the conclusion of the regression analysis that no adjustment was necessary to account for the presence or absence of waterfront. Two of the Cape Fox parcels, Parcels 4 and 5, have significant amounts of frontage on Upper George Inlet, including a number of islands. All available evidence indicates waterfrontage accounts for a significant portion of the value of parcels possessing this attribute.

It was the conclusion of the regression analysis that "% Forested"

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is an attribute significant enough to warrant a positive adjustment. It is not entirely clear how this adjustment is explained in terms of its relationship to "% Open". The two attributes, both requiring positive adjustments, appear opposed to one another.

The regression analysis indicates no adjustment is necessary in consideration of size. The eight sales utilized in the program vary from 40 to 792 acres. That no consideration is given to this attribute is contrary to all available knowledge and appraisal practice.

The regression analysis indicates a significant positive adjustment should be applied in adjusting for presence or absence of a stream. Several of the comparable parcels appear to possess streams. In some cases this was adjusted for in others it was not.

Six of the eight regression comparables are logged off or timber value appeared irrelevant. Two sales, sale 95 in particular, possess amounts of commercially valuable timber. As valuation of the all the subjects is on a clearcut basis the presence of timber would appear to require allocation out of the sale price if these sales are used as comparables.

CONCLUSION

This report essentially remains as cumbersome and unreadable as when it was first submitted. The addition of adjustment charts in the MKTCOMP process, allowing the reader to now mathematically compute the dollar amounts of adjustments made, and some minor editorial adjustments, are the only significant changes. The heart of the report, the regression analysis, remains a technical mystery to most readers.

On several occasions and from several different sources I have satisfied myself that the mathematics of the regression program used by the appraisers are correct. I have examined arguments for and against use of a small data set. It is easy to recognize that one small change in the comparable data could result in broad changes in the adjustments and resulting values, a circumstance not as likely to occur if a much larger number of sales had been used in the regression process. I believe the appraisal team had compiled the best set of large acreage sales data available in southeast Alaska. A larger data set was available.

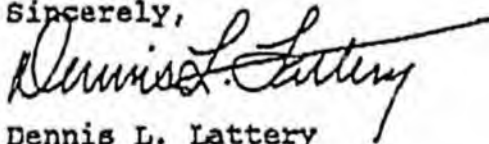
Page 6
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Despite repeated advice of the advisability of a second approach to value to support the statistical process the appraisal team has resisted doing so. Such a report could have been completed months ago. The generic market analysis recently presented to me as representing some form of support for the statistical analysis is considered to be generally irrelevant.

There are numerous conclusions arising out of the regression analysis that fly in the face of a large body of current appraisal practice and knowledge. These inconsistencies and contradictions are too significant to be either ignored or explained away by the sophisticated nature of statistical analysis.

For these reasons I cannot recommend approval of this report as evidence of the fair market value of the Cape Fox and State properties. At the same time, in deference to the appraisal team and a sophisticated computerized process that defies easy explanation, I cannot, unequivocally, state that either the process is incorrect or the value is wrong.

Sincerely,



Dennis L. Lattery
Review Appraiser

cc: Ron Swanson, Director
Martha Welbourn, Chief, Land and Resources
Don Karabelnikof

besides a history of appraising's use of regression, the most probable buyer, timber harvest companies, use regression extensively to value properties and are familiar with its use. This is consistent with appraisal theory of buyer calculus or simulation to use a technique commonly used by the market for the subject property. Although the appraisers use regression and it supports the MKTCOMP technique closely, it was not the prime technique.

MKTCOMP Technique

MKTCOMP is a mechanized adjustment grid. Most appraisers do the same adjustment process on a typewritten page or spreadsheet program, like LOTUS 123. Dr. Robbins has written a computer program, which is more complex. Based on inputs of either judgmental, paired sales, or regression coefficient characteristics developed into factors, MKTCOMP adjusts the comparables to the subject in the same manner as an appraiser does on an adjustment grid.

I studied MKTCOMP program in the mid 1978's and have used it in my appraising since 1981, including land appraisals. I have used both judgmental and regression coefficients as input characteristics. I understand and concur that the MKTCOMP program using regression coefficients is accurate from the data and is the best technique for determining value in this case. Regression coefficients are based on the market and are better than unchecked judgments

MKTCOMP has some unique characteristics, as programmed by Dr. Robbins, compared to a traditional adjustment grid. MKTCOMP can search a comparable data base I choose the best comparables. In this case, the program along with the appraiser's judgment choose five comparables as the best. This program adjusts all comparables based on the factors inputted and chooses based on a C-index. The C-index is simply the squared comparable adjustment amount added up with the square root taken. My personal MKTCOMP program picks the best comparables based on the total of the factors added up. Several methods are available. Dr. Robbins method chooses comparables with the least number of large adjustments to determine the most similar. Five comparables were the chosen to be the best at the point when the C-index stopped changing, when adding an additional comparable.

Another concern is the use of regression coefficients from the regression as factors in the MKTCOMP adjustment grid and whether they represent dollar adjustments. In this case, the regression coefficients (percent non-forested open land, 1648; date, -185; % slope, -1541; stream, 138; and % forest, 247) appear logical and the signs (+/- before the coefficient) are correct compared to any readers understanding of the market. The amounts can not be directly translated to the market individually. Logical amounts and signs are not necessarily the case with regression. Individually the figures do not represent dollar values, but after totaling the adjustments to each comparable, the total adjustment represents dollar per acre.

MKICOMP has an advantage over regression using the same coefficients. The adjustments are calculated on the differences between the subject and the comparables rather than on the subject's characteristic. This lowers the variance around the predicted market value. The MKICOMP with coefficients has a narrower range of values than the small regression formula.

I ran the MKICOMP program with the data base of eight comparables and achieved the same results. I also ran the MKICOMP program using a comparable as the subject and the other seven comparables as comparables. This "holdout" analysis confirms that the model (the set of adjustments) works for this property submarket. On an actual selling price versus MKICOMP with coefficients predicted value chart, all comparables were predicted within two standard deviations and the three best comparables were more accurately predicted.

I redid Exhibits VI-7 through 14 on pages 6-19 to 6-26 into an adjustment grid that looked more like an MAI adjustment grid using the reports figures. This summarized and rounded some of the figures and added the non-comparable adjustments. The authors may include that in their report, but it is not a substantial contribution to the report, only a reformat of their information.

Summary

I have concurred with the \$8,000,000 value based on my review of the land residual land appraisal portion. The report is difficult to read for the average layman, but anyone trained in all techniques of appraising or having the advice of someone familiar with regression should be able to replicate the conclusions in the report. The report wording is ponderous and academic in parts, but it is still readable. The report format does not follow the MAI textbook outline, but all elements seem to be included to determine value. One of the major critics of appraisers, writing in the "Mortgage Banking Magazine", has said appraisers elevate format over substance. This appraisal has supportable adjustments for the differences between the comparables and the subject, substance, rather than simply judgments. I concur with the information provided as allowed by a desk review, have used and agree with the techniques chosen, have checked the mathematics and rerun all analysis. As a review appraiser. I can not rewrite the report to put it into an outline format more typical of MAI format, but can concur with the value.

Respectfully submitted,

Dr. Lynn M. Woodward MAI, SREA
Ph.D. in Real Estate and Urban Land Economics
Review Appraiser, did not inspect

attached: certification and resume

By April 10, 1992, final copy with signature, certification and resume will follow after returning to Florida

Dr. Lynn N. Woodward MAI, SREA
Lynn Woodward and Associates
4518 Pawnee Trail
Sarasota FL 34233-1947
(813) 924-8661

April 10, 1992

Don Karabelnikoff, CRE
Karabelnikoff and Associates
4041 B Street, Suite 201
Anchorage, AL 99503

Re: Review of Cape Fox Corporation/State of Alaska Land Exchange

Dear Mr. Karabelnikoff,

I have read, understood and concur with the value conclusions of the residual land appraisal of the January 1992 copy of the APPRAISAL FOR CAPE FOX CORPORATION/STATE OF ALASKA LAND EXCHANGE. Paragraph 9g., page 7, of your agreement, dated August 8, 1991, with the Ketchikan Gateway Borough states, "The Appraisal shall be delivered with a separate letter report by a review appraiser holding an MAI designation. The reviewer must concur with the conclusions of the Appraisal Report after performing a desk/field review." This letter serves as a review letter. I did not inspect the subject property nor the comparables, but did a desk review of the written report.

The cost approach was not used because the subject property had few improvements. The income approach was included in the timber value. I did not review the timber value as I am not an expert forester, only a property appraiser. I also do not have an opinion on the non-comparable adjustments leading to the \$8,888,888 value, such as subsurface, open space or road costs as I am not a geologist, forester nor road engineer. The income approach was not used for the residual land appraisal because few comparables, which were rented at the time of sale, were found. The market comparison approach was used using two techniques: 1. stepwise forward regression and 2. MKICOMP, which is a mechanized market comparison adjustment grid.

Recommended Addition of a Traditional Market Comparison Technique

Because of the concerns in understanding the report by any reader of the original market comparison techniques included in the report, this reviewer has recommended an additional technique to be used in the market comparison approach. The traditional market comparison adjustment grid uses judgmental factors for adjustments and conclusions of value for each parcel. Although the variances in value for individual parcels were higher, the overall value supported the \$8,888,888 value, which was developed from the other two techniques.

A few report readers have expressed concern that the report did not use the traditional adjustment grid which normally uses judgmental adjustment factors or factors developed from paired matched sales analysis. The judgmental factors were used in the traditional technique, recommended to be added as noted above. Paired matched sales can not be used in this report because of the dissimilar comparables. Paired matched sales analysis is best used when similar comparables have only one or two significantly different features. Each of these comparables have four or more characteristics which are different at any one time. I could not develop a paired matched sales adjustment analysis for the adjustment factors.

Regression

Regression is essentially a multiple matched sales adjustment technique. Regression is an accepted appraisal technique which has been used since the 1960's. Unfortunately most MAI's are not trained comprehensively to understand regression as it is optional to gain a designation.

I ran the CSS stepwise regression program with carefully checked data base from the report on a different computer. I conclude that the technique is developed accurately and five factors -- percent open (non-forested), date, percent slope, presence of stream, and percent forest -- were chosen as the best characteristics to predict value from a search of over ten factors inventoried from the subject and the comparables. Even with the small sample size of eight, five degrees of freedom, these factors have a high significance (F) in determining value. The R-squared is over 98%, even with only three factors. Stepwise forward regression performs similarly to an appraiser by picking the best characteristic that effects value first, then adding each characteristic respectively, which explains most of the value difference between the comparables, in turn. In this case the first three (percent non-forested open land, date, and percent slope) predicts nearly all the variance in value with stream and percent forest only minor contributors to explaining the value. Several other contributors and reviewers have run similar stepwise regression programs on other computers and concluded the same results with little variance. One reviewer run a multiple linear regression program (different from stepwise forward regression) with several data entry errors. Any reader with access to a PC computer and a statistical package program, and maybe statistical advice, using the proper program and input should be able to duplicate, within a reasonable variance, the results.

One concern is the small sample size. The scope of the appraisal, considering the lack of private sales in this area of Alaska was impressive. Over 100 sales were analyzed, 33 sales were inventoried, and 8 sales, a large number for the market, were determined to be representative of the market. I have used regression with small sample sizes, based on classic statistical assumptions, for a long time. It is very difficult to separate real estate into proper submarkets and maintain large sample sizes. As one statistical professor told me, small samples are better than no samples and better than judgments normally used by appraisers. The regression is a representation of the market.



SIERRA CLUB LEGAL DEFENSE FUND, INC.

The Law Firm for the Environmental Movement

125 4th Street Juneau, Alaska 99801 (907) 586-2751 FAX (907) 463-5891

Warren, Mr. M. Kenley Ansel Adams

Tongass Conservation Society, Inc.

v.

State of Alaska, Department of Natural Resources

No. 1JU-92-847CI

The Sierra Club Legal Defense Fund represents the Tongass Conservation Society in a challenge to the DNR land exchange with Cape Fox Corporation at Leask Lakes, near Ketchikan. This appeal is filed in Superior Court in Juneau. Following are the principal legal points raised:

ALASKA OFFICE

Robert B. Briggs
Eric P. Jorgensen
Thomas S. Waldo
Staff Attorneys

Maureen E. Twitchell
Associate Attorney

David M. Chambers, Ph.D.
Mining Analyst

Kaylene Farley
Office Manager

REGIONAL OFFICES

Denver, Colorado
Honolulu, Hawaii
New Orleans, Louisiana
San Francisco, California
Seattle, Washington
Tallahassee, Florida
Washington, D.C.

INADEQUATE APPRAISAL

1. DNR has approved this exchange **without completing an appraisal**, in violation of AS 38.50.020, AS 38.50.130 and 11 AAC 67.240.

2. DNR has **abused its discretion** in several respects by relying on the existing draft appraisal. DNR's own appraisers have found the draft to be severely flawed. The draft is marred by a conflict of interest, improperly discounts open space land values, and fails to adequately consider public interest use values.

UNLAWFUL ROAD ACQUISITION

3. DNR is attempting to use state land and timber to pay for road upgrades valued at \$2.2 million. This sole-source procurement serves the purpose of bolstering the value of Cape Fox's land, which is worth far less than the state land to be parceled up and exchanged. This procedure violates the State Procurement Code, AS 36.30, and DNR's own regulations, 11 AAC 67.260.

INADEQUATE AGENCY REVIEW

4. DNR failed to consider selling or leasing the state land instead of exchanging it, as required by AS 38.50.100 and AS 38.50.130.

5. DNR did not adequately consider the social, economic and environmental impacts of the exchange, as required by AS 38.50.130.

INADEQUATE PUBLIC PROCESS

6. DNR has not completed the land use planning and classification required by AS 38.04.065 for all land disposals before approving this exchange.

7. DNR did not publish a map of the areas proposed for exchange in local newspapers, as required by AS 38.50.110.

K E T C H I K A N G A T E W A Y B O R O U G H

RESOLUTION NO. 1027A

A RESOLUTION OF THE ASSEMBLY OF THE KETCHIKAN GATEWAY BOROUGH, ALASKA, PROVIDING FOR A LAND MANAGEMENT PLAN, INTERIM PROTECTION OF RESOURCES, AND MAINTENANCE OF PUBLIC RECREATION FACILITIES ON THE STATE PROPERTIES SUBJECT TO THE PROPOSED EXCHANGE BETWEEN THE STATE OF ALASKA AND THE CAPE FOX CORPORATION.

R E C I T A L S

- A. The availability of recreational areas for the residents of the Ketchikan Gateway Borough is now seriously limited.
- B. Lands currently owned by the State of Alaska within the Borough demonstrate great potential for roaded access for recreational activities by the residents of the Borough, including children, the elderly, and the disabled.
- C. Certain lands now owned by Cape Fox Corporation that are being considered for a land exchange with the State also have great potential for similar roaded access for recreational activities by all residents of the Borough.

NOW, THEREFORE, IT IS RESOLVED BY THE ASSEMBLY OF THE KETCHIKAN GATEWAY BOROUGH, ALASKA, as follows:

Section 1: Statement of Intent. The Ketchikan Gateway Borough Assembly has supported the proposed land exchange on the basis of the roaded recreational opportunities which it will provide to residents and visitors to Ketchikan. The Assembly recognizes that the lands and facilities to be acquired or retained by the State have high recreational value. The Borough Assembly recommends that the State protect these recreational values by limiting the range of permitted use and activities on said lands and facilities to those which are primarily recreationally oriented or otherwise subject to the terms of the Final Exchange Agreement.

Section 1: Land Management Plan. The Ketchikan Gateway Borough recognizes the need to provide a Land Management Plan for all state-owned land that will result from proposed land exchange. These lands include all lands currently owned by the Cato Fox Corporation in the White River drainage, in the vicinity of Lake Harriet Hunt and Talbot Lake which are proposed to be transferred to the State and all lands retained by the State in the Leask Lake tract as a result of the proposed land exchange. The Ketchikan Gateway Borough commits to the preparation of such a plan in cooperation with the State of Alaska.

Section 2: Interim Stewardship. The Ketchikan Gateway Borough supports any administrative dedication by the State to provide for the protection of the natural resources during the period prior to the preparation and prior to adoption of a Land Management Plan which is necessary in order to provide for protection of the recreational values of those lands described in Section 1 hereof.

Section 3: Facility Maintenance. The Borough Assembly understands that the State is unwilling to assume costs associated with the maintenance of road facilities to be provided as a condition of the final exchange agreement. In consideration for opening of areas to be acquired or retained by the State to roaded recreational use, the Borough agrees in principle to assume the cost of facility maintenance in the event that the State continues to be unwilling or unable to and to the extent the Borough is empowered to do so.

Section 5: Effective Date. This Resolution shall be effective upon adoption.

ADOPTED this _____ day of _____, 1992.

BOROUGH MAYOR

ATTEST:

BOROUGH CLERK

APPROVED AS TO FORM:

Gene S. Williams

BOROUGH ATTORNEY

Public Hearing:	_____		
Effective Date:	_____		
Roll Call:	Y	N	A
Beatwright			
Cote			
Cruise			
Fader			
McCarty			
Holman			
Conley			
Four (4) affirmative votes required for passage			