

Southern Southeast FYSTS 2023-2027

Comments

Department of Natural Resources, Division of Forestry & Fire Protection
June 2023

The following comments were received during the public comment period on the SSE FYSTS 2023-2027.

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	SITE SPECIFIC
	Suemez Area
Katie Rooks & Maranda Hamme	SEACC opposes this 120-acre old-growth sale with 2.2 more miles of road building.
Larry Edwards	Alaska Rainforest Defenders request that you remove this remote sale from the 2023-2027 FYSTS. There is little or no remaining infrastructure in Southeast Alaska that is necessary to enable logging remote areas. Many of these sales historically received just one bid from a company that does not operate a local mill.
	El Capitan Area
Katie Rooks & Maranda Hamme	<p>SEACC opposes this 340-acre old-growth sale on Settlement/Recreation classified land in a high vulnerability karst area, which will add another 4.5 miles of road. The plan to log the El Capitan area directly opposes the Prince of Wales Island management plan (POWIAP) priorities for recreation and visual aesthetics in this area. These are the last connections for deer to higher elevations in this area. These are the last old growth areas, as well.</p> <p>The following are excerpts from the Division of Forestry’s Preliminary Best Interest Finding (PBIF) for the El Capitan timber sale:</p> <p>Most of the lands in this proposed timber sale are co-designated Settlement and Recreational classified land. While these uses are identified as the highest and best use in the area plan [Prince of Wales Island Area Plan, or POWIAP] they do not preclude other uses (at 17). Per the Prince of Wales Island Area Plan [which is the management plan currently guiding activity on land classifications and in certain areas outside the Southeast State Forest], timber sales in settlement land are to benefit the eventual settlement classification. DNR interprets this to mean that roads are beneficial to the economics and practicality of a settlement project if they do not preclude the primary classification. The proposed timber sale is projected to develop the pioneering access typically needed for more permanent roads and economical survey work associated with subdivision development (at 22). It was determined through the project reconnaissance that some areas classified as Settlement are likely not suitable for a subdivision because of the terrain or other resources (such as streams). In these areas, the land and roads will likely serve in the long term to support overall forest values. While the proposed harvest will be visible from the waterbodies (sic) [El Capitan Passage, Twin Islands Lake—both designated as Recreation areas through the POWIAP], it by contrast to residential development is temporal and will be reforested within the timeframe that most settlement is projected to occur in the area (at 23). The sale is not expected to cause significant adverse impacts overall to the wildlife populations on POW based on the area planning information and the site-specific observations [emphasis added] (at 20).</p> <p>This implies that the DOF only used these two sources of information to make conclusions about the area’s importance as deer habitat. The DOF is required to consider ADF&G’s input to inform timber sale plans;²⁸ if there was no way to get specific recommendations about the terrestrial habitat, the DOF should have consulted previous literature and ADF&G input on the areas,</p>

Commenter	Comment
	<p>which exist in bulk. The observations of DOF's timber cruisers and an area management plan that hasn't been formally updated since 2008 are not sufficient tools for the DOF to have made an informed decision. Additionally, the DOF seems prepared to ignore the Prince of Wales Island management plans priorities in order to log the area:</p> <p>The POWIAP identified an objective to maintain aesthetic qualities and recreation values of the El Capitan area by minimizing development on the waterfront of Twin Island Lake and El Capitan Passage associated with settlement. The two objectives were discerned to be in opposition in some areas for some users [emph.added] but considered to be rectifiable. This perspective is based on the propensity and resilience of Southeast Alaska to grow trees within the time frame of likely residential and recreational development (at 21).</p> <p>The plan to log the El Capitan area goes against Prince of Wales Island management plan priorities and area designations, serious wildlife and related subsistence concerns as established by the Forest Service and the State of Alaska's own scientists, and the desires of an overwhelming majority of POW residents who live here now, not who may live here by the time those trees have grown back, in 80 or more years. Regarding habitat concerns, the DOF dispersed its statements about habitat throughout the PBIF so that the reader was hard-pressed to get a clear picture of habitat type, concerns, and how it was evaluated in the El Capitan sale area:</p> <p>The sale area was not identified as crucial habitat (Ha) or prime habitat (Hb) in the POWIAP or the SESFMP [Southeast State Forest Management Plan]. DOF staff did not observe wolf or bear dens within the units during timber reconnaissance efforts, unit layout, or road location [emph. added]. Per ADF&G, the proposed units may have some value for deer habitat due to their relative location to the previously harvested areas on state and federal land that is now in a regeneration status with varying ages. ADF&G combined several habitat models with collared deer data to apply a predicted importance to the timber sale footprint. It [was] projected that approximately 20% of the area as having important seasonal habitat scores for deer [emph. added]. This timber sale will likely remove important winter deer habitat...A reduction in deer habitat in the immediate area may be expected because of the harvest of this timber. Consequently, and without intermediate stand treatment (pre-commercial tree thinning) the act of the harvest of timber will eventually lower the capacity of the immediate area to provide for deer habitat values during the period of 30 to 65 years...(pp. 17-18).</p> <p>The POWIAP has not been updated since 2008. The Southeast State Forest Management Plan has not been updated since 2016. During that time, the landscape and habitat have changed considerably. There is no effort by the DOF to include substantive habitat information in this document; only its interpretation of information it claims comes from ADF&G that isn't attached or included. All ADF&G information SEACC found shows that this area has lost carrying capacity and habitat continuity at a rate that cannot be considered sustainable, and that deer populations in these areas will certainly continue to decline. The DOF should ensure that ADF&G habitat staff have the opportunity to fully ground-truth all future sales on POW, due to specific concerns about POW's old-growth habitat loss linked with its declining deer population, cited in countless Forest Service and ADF&G literature and websites.²⁹ The DOF should then attach or include written recommendations from ADF&G wildlife biologists to its timber sale plans and FYSTS documents. The public cannot make fully informed comments without this information.</p>

Commenter	Comment
	<p>Considerable portions of the El Capitan area also have high-value karst resources which receive special protections on National Forest System (NFS) land. There should be no difference on non-NFS land. Since this is the opportunity for the public to provide comments on these proposed sales, the information about karst resources as well as other forest features, such as watersheds and habitat should be presented.</p>
Edward D. Douville	<p>WHEREAS, The Board of Directors of Shaan Seet, Incorporated, (herein, "Board of Directors" and "Shaan Seet") is organized pursuant to the Alaska Native Claims Settlement Act, U.S.C. 1601 et seq. (herein, the "ANCSA") and is authorized to hold, invest, manage, and/or distribute property and funds for and on behalf of its shareholders; and</p> <p>WHEREAS, Shaan Seet, Inc. strongly opposes the Timber Sale of 340 Acres which includes clear-cutting of 8 million feet of old growth forest on the northern end of Prince of Wales Island near El Capitan Passage; and</p> <p>WHEREAS, Many Shaan Seet Shareholders and their descendants have ancestral ties to Tuxekan and the surrounding sacred areas; and</p> <p>WHEREAS, Logging this area will impact the traditional homeland of Tuxekan and the surrounding sacred areas including artifacts, petroglyphs, and other items of cultural importance residing in this area; and</p> <p>WHEREAS, Logging this area will create an imbalance in an already fragile ecosystem of an area where surrounding areas have already been previously logged directly affecting the deer and fish population and our traditional harvesting; and</p> <p>WHEREAS, Logging this area will also affect the views from the Scenic Highway which is enjoyed by visitors, supporting tourism, the second biggest economic driver in the region as identified by the Southeast Conference Economic Report, and residents alike;</p> <p>NOW THEREFORE BE IT RESOLVED, that Shaan Seet, Inc. opposes the Timber Sale of 340 Acres which includes clear-cutting of 8 million feet of old growth forest on the northern end of Prince of Wales Island near El Capitan Passage.</p>
Ed Douville	<p>Considerable portions of the proposed El Capitan sale area and Kosciusko Island have high-value karst resources that receive special protections on National Forest System land. There should be no difference on non-NFS land. 75% of Karst lands have already been logged on Prince of Wales and the cedar trees that are currently rooting on karst land will likely not grow back. El Capitan Cave is one of Prince of Wales highest attractions for visitors and residents alike. This area is critical infrastructure and a source of economy and pride for the island. This sale is far too close to this recreational area and camping sites Kosciusko Island and El Capitan also hold cultural and historical significance to the Tribes and clans on Prince of Wales. There is evidence of both petroglyphs and artifacts found both above ground and within the cave system of the Karst.</p> <p>www.discoverprinceofwales.com lists El Cap Caves as the #1 recreation activity on the island tripadvisor.com lists the El Cap Caves as #3 recreational activities on POW out of 26.</p>
Larry	<p>Defenders request that you cancel or substantially downscale this project. The Alaska Forest Resources and Practices Act directs</p>

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Edwards	<p>forest managers to administer lands for multiple use “in the manner that best provides for the present needs and preserves the future options of the state.” “Multiple use” in large part means “the <i>management of all the various resources</i> of forest land ... making the most judicious use of the land for some or all of these resources or related values, benefits and services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions.” Thus, “some land will be used for less than all of the resources,” after consideration of the relative values of various resources. This project violates this statute by converting multiple use lands to solely timber purposes. The non-Southeast State Forest lands that the Division proposes to clearcut are in areas classified for public use of fish, wildlife and water resources and other multiple use purposes. Land managers are supposed to protect these portions of the project area for recreation and aesthetic values of the area and for potential value as a subdivision. Developments must retain options for siting public, private and commercial recreation developments and consider the area as a viewshed. El Capitan Passage is a scenic byway, protected from coastal storms, and is a heavily used transportation route. Through a public process, the DNR classified this area for uses such as dispersed recreation activities that include hunting, fishing and camping by residents and tourists. Because these activities, as well as subsistence uses occur throughout the area, land managers are to avoid impacts to fish and wildlife habitats and harvests. The significant areas of past harvest in the area heighten the need to retain remaining old growth forest. This project will also remove old-growth timber in important areas connecting low-elevation beach habitat with higher elevation areas. Most of the recent logging adjacent to the project area occurred over the last 30 to fifty years. These clearcuts left local deer with limited forage and nowhere to run and nowhere to hide other than this particular old-growth habitat at risk in this project. The Division should cancel or substantially downscale this sale.</p>
	Control Lake Area
Katie Rooks & Maranda Hamme	<p>SEACC opposes any additional harvest in this logged-over watershed, in part because of the immediately adjacent highway’s status as a designated Scenic Byway. On that basis, we oppose this harvest, as well as on the basis of cumulative effect; this area has been completely logged over in recent years, ruining the viewshed of the lake itself as far as its former recreation uses (there is a Forest Service cabin on the lake) and negatively impacting the area’s watershed</p>
Ed Douville	<p>We oppose all Control Lake area sales. This over-logged watershed is outlined within the anadromous stream catalog and holds several species of Salmon. In addition, this area is immediately adjacent to one of our only accessible cabins on the road system. The Control Lake area has already recently been hit hard through the Mental Health Trust land and is a sore eye for residents when driving up to the 'T'.</p>
	Stairway Sale Area
Katie Rooks & Maranda Hamme	<p>SEACC opposes the 431 acres of proposed old growth sales described in three separate sale descriptions on the basis that it puts lives in danger. Dr. James Baichtal, recently retired geologist for the Tongass National Forest, lives in Thorne Bay and worked on the Landslide Science and Technical Committee that made recommendations to the Alaska Board of Forestry from 2009-2010. Dr. Baichtal created maps and made recommendations from the data they had at the time. Following is Dr. Baichtal’s statement about the Stairway Sales:</p> <p>The proposed harvest will clearcut the upper watersheds of landslide-prone lands directly above the road. I was the geologist that worked with the Organized Village of Kasaan and the City of Thorne Bay to remove and repair the landslide that happened on</p>

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	<p>January 1, 2019, isolating the populations of South Thorne Bay and Kasaan. This timber harvest contains a large amount of slopes greater than 72%. It is not worth the risk to infrastructure and the population. On Page 49 of the Landslide Science & Technical Committee's report¹⁷ it shows the same steep slopes greater than 67%. This was before we had LiDAR to precisely map the slopes. The State of Alaska knows these areas have been identified as potentially landslide prone and that they lie directly above a public access road. The Forest Resources & Practices Act (FRPA) directs that timber operators provide the following information in their Detailed Plans of Operation (DPOs): any known unstable area; for the purposes of identifying unstable areas under this subparagraph, the operator shall consider sites with slopes generally in excess of 50 percent gradient...¹⁸</p> <p>The DOF is endangering residents of Prince of Wales Island with this timber sale. The DOF justifies harvest:</p> <p>The potential harvest units identified along the ridge are isolated patches of timber remaining following previous harvest entries, and each unit would require the construction of new access spurs. The sale area will likely not be utilized for Settlement purposes due its isolated location and topography.¹⁹</p> <p>If this conclusion can justify harvest of Settlement lands, then we have serious questions as to the justifications provided for logging the El Capitan area on Settlement classified lands because the El Capitan area is more remote and topographically problematic for harvest. Additionally, more costly roadbuilding is necessary to access these patches, making it likely that even though these sales are close to Goose Creek's small mills, those mills will not end up getting the sales because most do not have the capacity to build roads. So again, the only beneficiary from this sale is likely to be Viking Lumber.</p>
	Naukati Area
Aaron Brackel	Naukati has been hit far too hard by past logging, as has Control Lake. These areas should be avoided and the old growth forest in those areas should be allowed to provide the existing renewable resource returns functions that support wildlife habitat in such hard-hit areas.
	SEACC opposes all timber sales in the Naukati area. This area has been completely logged out in recent years, across several different ownerships. Naukati Bay is at least as remote as South Thorne Bay. The State's proposed sales here all fall into Wildlife Analysis Areas of Concern as expressed in the Forest Service management plan for the area in 2016. Given the increase in clearcut logging since then by the State, Mental Health Trust, and the University of Alaska, plus the decrease in deer populations on POW even since that time, the concern must be considered greater in 2023.
Ed Douville	We oppose all sales outlined within this schedule in the Naukati area. When driving into Naukati, residents of the island are able to see the impacts and destruction the past sales by the State, University of Alaska, and Mental Health Trust have done to our old growth forests first hand. Given the increase in clearcut logging since then by the State, Alaska Mental Health Trust, and the University of Alaska, plus the decrease in deer populations on POW even since that time, the concern must be considered greater in 2023.
	Thorne Bay Area

Commenter	Comment
Aaron Brackel	The Thorne Bay areas should be avoided because of steep slopes and long-term risks to people and downslope riparian impacts from landslides. Climate change and increasing precipitation should be taken much more seriously than the State has to date. Each clearcut is a long-term engineering decision, as are the new road sections by which new clearcuts would be accessed.
	George Inlet Area
Katie Rooks & Maranda Hamme	Most of this acreage is on General Use land, not Southeast State Forest land. The DOF should not log outside southeast state forest lands. Additionally, there are too many “unknowns” with this sale area to comment fully—the state hasn’t field-verified the operable timber base, nor has ADF&G surveyed the area for anadromous streams, nor has the Office of Historical Archaeology surveyed the area as requested. ³⁰ The DOF should not include sales on the FYSTS for which there is minimal information. This falsely gives the impression that the public has had a full opportunity to comment on these sales; in reality, there is too much missing information to inform a public comment. The DOF should reissue the FYSTS at a point where vital information can actually be provided.
Larry Edwards	In 2027, the FYSTS proposes to sell roughly 6,300 MBF of timber from 310 acres in the George Inlet area – 103 acres of SESF lands on the west side and 213 acres of General Use lands on the east side. At least 1.8 miles of spur road construction will be necessary to access the timber stands. At the August 25, 2020 Board of Forestry meeting, representatives from the Alaska Mental Health Trust announced plans to sell up to 80 – 100 MMBF from this same area. As with many areas in southern Southeast Alaska, there has been a substantial cumulative reduction in wildlife habitat. As of 2014, timber companies had removed over a third of deep snow winter habitat for deer, 28.4 percent of riparian foraging habitat for black bears, a third of the bald eagle habitat, and larger proportions of habitat for smaller, interior forest wildlife species such as marten and brown creepers. Revillagigedo Island is the most important island or area for deer hunters from Ketchikan in ADF&G Game Management Unit 1A. Given the potential for massive cumulative impacts caused by past logging combined with the Alaska Mental Health Trust sale, the Division of Forestry should leave the 316 acres intact for multiple use purposes, and Defenders so requests.
	Wrangell and Mitkof Areas
Larry Edwards	Alaska Rainforest Defenders also requests that you downscale or remove timber sales on Wrangell and Mitkof Islands. In 2026, the FYSTS proposes to offer roughly 3,000 MBF from roughly 160 acres of SESF land in the Earl West Cove area on Wrangell Island. The FYSTS projects construction of 1.5 miles of road. The DOF considers the operability of the area to be marginal because most of the timber is hemlock and there are high mobilization costs. The area is a mix of old-growth and young growth. Earl West Creek is an important anadromous stream with several tributaries in the sale area and the 2016 SESF Management Plan record indicates that it is an important local recreation area, particularly for sport fishing. As noted in a 1998 Forest Service Wrangell Island Analysis Report for future timber development, by the end of the 1990s, “much of the ‘easy’ ground [on Wrangell Island] has already been harvested.” This means that remaining timber areas on the island occur near scenically sensitive travel routes, highly sensitive watersheds, wildlife travel corridors and other habitat. These concerns all exist in this unit, which include multiple anadromous streams used as local fishing holes and for other recreational opportunities. The FYSTS also proposes to sell 5 MMBF old growth timber from 369 old growth acres within Southeast State Forest lands near Woodpecker Cove on Mitkof Island. The amount of road construction is unknown. The proposed amount of logging would degrade

Commenter	Comment
	multiple use values for deer winter range, salmon habitat, camping and recreation and Sumner Strait scenery.
	Heceta Area
Katie Rooks & Maranda Hamme	SEACC opposes this 145-ac old-growth sale, with 80 acres of young growth included and 2.5 more miles of road on Heceta island. This land is all classified as General Use; therefore, it is not part of the Southeast State Forest and is not managed specifically for timber production. This sale provides another opportunity for carbon leasing in a remote area.
Larry Edwards	Alaska Rainforest Defenders request that you remove this remote sale from the 2023-2027 FYSTS. There is little or no remaining infrastructure in Southeast Alaska that is necessary to enable logging remote areas. Many of these sales historically received just one bid from a company that does not operate a local mill.
	Edna Bay, Parlay #2 Area
Katie Rooks & Maranda Hamme	There were not enough details in the FYSTS to provide substantive comments on this proposed young-growth sale on over 600 acres and necessitating 2.3 more miles of road building. SEACC requests that the DOF re-issue the FYSTS with pertinent detail.
Larry Edwards	Alaska Rainforest Defenders requests that you cancel or downscale proposed sales near Edna Bay, where intensive logging over the past decade has removed many of the most important remaining old-growth stands and clearcut many of the oldest second growth forests in the region. The cumulative effects of past, present and future logging by of all timber landowners on old and second growth forests should be a critical factor in whether or not to proceed with additional sales in the Edna Bay area. There are already large areas of adjacent clearcuts and the additional clearcuts proposed on southern Kosciusko Island in this FYSTS would increase an already large expanse of recently clearcut forest. This problem recurs throughout areas affected by sales proposed in the 2023-2027 FYSTS, such as the massive Alaska Mental Health Trust clearcut planned adjacent to the George Inlet sale area, the fragmentation of Gravina Island, and throughout sale areas on Prince of Wales Island.
	Prince of Wales (POW) Island Area
Bert Corley	I am writing to express my opposition to the proposed old-growth timber sales in the Southeast area of Alaska, including the El Capitan and Whale Pass sales. The destruction of these old-growth forests would be a catastrophic loss for both the environment and the communities that rely on them. Old-growth forests are vital ecosystems that provide numerous benefits to our planet. They store vast amounts of carbon, help regulate the climate, support a wide variety of wildlife, and purify the air and water. Moreover, old-growth forests have cultural and spiritual significance for many Indigenous communities and local residents. Logging these ancient forests for short-term profit is not worth the long-term damage that it would cause. Once these forests are gone, they cannot be replaced. The loss of these ecosystems would have far reaching consequences for both the environment and the economy. I urge you to reconsider the proposed old-growth timber sales and instead invest in sustainable forestry practices that preserve these invaluable natural resources. The State of Alaska has a unique opportunity to lead the way in protecting old-growth forests for future generations to enjoy.
Ben Kreigmont	I am writing to voice my displeasure and opposition to the proposed timber sales in Whale Pass and El Capitan. These old growth trees are worth so much more to us standing where they are then bundled up and sold overseas. These types of sales are a definition of ‘robbing your future to pay for today’. The industry needs to move on from whole log old growth model. Mark me down as in opposition to old growth logging and these sales in particular.

Commenter	Comment
Brian Templin	<p>The City of Craig, Alaska would like to submit comments regarding the five-year schedule of timber sales currently out for review.</p> <p>The city does not object to the current schedule of timber sales and supports maintaining a viable timber industry on Prince of Wales Island. We would ask, however, that DNR and the division ensure that adequate data collection and study regarding deer and wolf habitat have been completed and that sales are conducted in a way to limit large impacts to these habitats. In addition, the City of Whale Pass has asked that the 292-acre harvest area adjacent to the residential area in Whale Pass be adjusted to reduce impacts on the residents of that community. The City of Craig supports Whale Pass in this request. The City of Craig reserves the right to participate in future comment periods and discussions related to this plan.</p>
Cheryl Fecko	<p>It has been mentioned that the timber industry is struggling. In the last few years I have seen more red cedar and large old growth trees stacked outside Viking Lumber than I can remember. The logging truck traffic, sometimes seeing 6-8 different trucks making the run toad from the mill tells me the timber industry is not suffering. I can appreciate that some of these sales require in-state manufacturing, thereby reducing round-log export and employing local people. This should be state policy if the intent is to support the local economy. Additionally more of the timber should be made available to small operators, and the bidding process made fair so that these truly small operators are not competing with larger timber companies.</p> <p>This schedule of sales and any others proposed for Prince of Wales Island should be move away from old growth logging not targeting it. I hope the state of Alaska moves towards smaller harvest units with extensive wildlife corridors and areas set aside for wildlife that won't become logged in some future land selection or exchange. The emphasis for DNR and the Department of Forestry and Fire Protection on Prince of Wales Island should rely less on timber production and more on other uses and benefits of the forest that could improve forest ecosystem health and contribute to a diverse, sustainable economy for future generations.</p> <p>I specifically oppose the sales proposed in the El Capitan and Whale Pass regions on Prince of Wales Island, especially those units that will cut more old growth and target red cedar in places that have already been hit hard by the industrial logging of past decades and the unrelenting land exchanges and selections privatizing the Tongass piece by piece for one use-timber harvest. I have lived on Prince of Wales Island for forty years and have serious concerns about the level of old growth harvest on Prince of Wales Island and the cumulative impacts of previous, current, and future harvests. These cumulative impacts have never been given enough consideration, and now it is more important than ever.</p>
Aaron Brackel	<p>Prince of Wales Island has been particularly hard hit by logging and roading practices. Please do not conduct timber harvesting activity in the Whale Pass and El Capitan areas.</p>
Don Muller	<p>NO MORE OLD GROWTH LOGGING IN SOUTHEAST ALASKA!! Especially at El Capitan and Whale Pass. Will you NEVER learn?</p>
Ed Sota	<p>There is no need to log the old growth in SE Alaska as this valuable resource will not be replaced for years if ever. Save Whale Pass and El Capitan.</p>
Karen Wolf & Sons	<p>Please scrap plans to destroy including El Capitan and Whale Pass. Trees take a LONG time to grow. Please do NOT chop Old tree's down!!</p>

Commenter	Comment
Kathrin McCarthy	I am opposed to logging old growth anywhere however the planned logging by the state of Alaska in Whale Pass and El Capitan Pass seems especially ill conceived. Logging this area will turn an important potentially extremely sought after place to live and recreate into a blighted area and will make it difficult for residents to engage in attracting tourist activities. The close proximity of logging to the homes of people who live in Whale Pass. I cannot imagine logging roads near the homes in Whale Pass. I am concerned about people's homes and the karst underlying much of these two areas. The does not seem to be an thoughtful analysis of how this will effect deer populations in the area. Doing anything that will negative impact Sitka Black tails will negatively affect the food safety of Whale Pass and El Capitan Pass communities. These two sales are terrible ideas. Don't go ahead with this I am also wondering who is going to buy the logged timber.
Katie Rooks & Maranda Hamme	SEACC opposes the proposed timber sales of old-growth forest on Prince of Wales. Due to continued logging and road building on multiple ownerships, including U.S. Forest Service land, Alaska Native corporation land, University land, and Mental Health Trust land, remaining old growth forests on Prince of Wales are becoming increasingly depleted and fragmented, resulting in a significant loss of habitat that is important for many species. Old-growth forests provide essential habitat for deer, bears, wolves, martens, flying squirrels, and goshawk, among others, as part of a complex ecosystem that also supports thriving watersheds for salmon habitat. The nature of island ecology is that species are confined and cannot travel to new habitats, risking extirpation and irreversible loss of biodiversity. Alaska Constitutional mandates for management of the state's renewable resources dictate that these resources must be used in a way that keeps them sustainable. ⁶ State forest land must be managed under the principles of multiple use and sustained yield. ⁷ The state is required to take a “hard look” at cumulative impacts by the Supreme Court: A bedrock principle in Article VIII of the Alaska Constitution mandates that the State's natural resources are to be made “available for maximum use consistent with the public interest.” ... We have said that to ensure these principles are followed, it is necessary for the State to take a “hard look” at all factors material to and relevant to the public interest: this “hard look” necessarily included considering the cumulative impacts of a project. ⁸ The Ninth Circuit Court has explained the significance of cumulative impacts: Cumulative impacts of multiple projects can be significant in different ways. The most obvious way is that the greater total magnitude of the environmental effects – such as the number of acres affected or the total amount of sediment to be added to streams within a watershed may demonstrate by itself that the environmental impact may be significant. Sometimes the total impact from a set of actions may be greater than the sum of the parts. For example, the addition of a small amount of sediment to a creek may have only a limited impact on salmon survival, or perhaps no impact at all. But the addition of a small amount here, a small amount here, and still more at another point could add up to something with a much greater impact, until there comes a point where even a marginal increase will mean that no salmon will survive. ⁹
Kim Kirby	I would like to register my concern with your plan to remove old growth trees from the El Capitan and Whale Pass areas. Old growth trees are non renewable and of prime importance in preserving an intact ecosystem that provides a carbon sink and prime habitat for wildlife. I'm an Alaskan resident with a home in Poor Man Bay north of Kasaan. The ravages of logging are all around me. At the present time your focus needs to be on restoring habitat and putting right the damage done. Certainly not carrying on with more rampant destruction. I am registering my disapproval of your plan. Please structure a plan for habitat restoration.
Klayton Curtis	I am writing to ask you, to beg you, not to approve the sale or logging of the old growth forest in the El Capitan area. This area is unique, the old growth forest and ecosystem is irreplaceable for thousands of years and is a spiritual place for me and many others. It is very painful to see logging happening to existing old growth forests, please do not allow it on more. Also, don't log Whale Pass old growth either. People live there!

Commenter	Comment
Kurtis Whitehead & Trina Nation	<p>My wife and I operate a small hunting/fishing lodge just outside Klawock, AK and we are real, year-round, snow shoveling Alaskans. We conduct fully guided big game hunts and saltwater charter fishing trips. I serve on all three of the ADFG Advisory Committees on POW and attended the Deer Summit in Craig, AK October of 2022, the 2023 SE AK Board of Game meeting in Ketchikan, the 2022 statewide Board of Game meeting in Fairbanks and the 2022 SE AK Board of Fish meeting in Anchorage. I've guided hunters & anglers in AK every year since 1996. The POW deer herd has been in decline since 2015 due to loss of habitat, habitat decline and wolf predation. Our deer herd is suffering not only from wolf predation but also from stem exclusion and loss of quality wintering habitat (old growth stands). At the Deer Summit referenced above, the Forest Service and ADFG gave multiple presentations explaining why our deer herd has declined and how serious the loss of quality winter range for our deer is all over the island. I am adamantly opposed to any and all POW old growth timber sales. We hardly have any quality old growth timber left on POW and yet the state is still trying to cut what little remains. This is not only irresponsible, but completely wrong. The few remaining old growth stands we have left on the POW archipelago is critical habitat for numerous species especially our deer. Our subsistence needs and the needs of our fish, game and habitat far outweigh the short term, nearsighted gain of cutting what little old growth we have left on POW.</p>
Maranda Hamme & Dain Myers	<p>Myself and my partner, Dain Myers are writing to oppose the current five-year State Southeast Timber Sales, including all old growth sales outlined in this schedule. I am a lifelong Alaska Native resident to Klawock, Alaska on Prince of Wales Island, where most of the logging has historically happened and where the State of Alaska now logs our remaining old growth. Through my 28 years living on Prince of Wales, I have seen firsthand the changes of the land of the course of my lifetime. In my lifetime, on Prince of Wales, I have seen salmon returns dwindle and deer populations decline due to old growth logging and road building. I have watched old growth forests completely dismantled to a field of stumps, just like the recent sale in Naukati. Of critical importance to myself and to other hunters on Prince of Wales, Old growth provides critical winter habitat for Sitka Black Tailed deer and salmon populations. All twelve communities that makeup Prince of Wales do not have access to large supply chain grocery stores and survive heavily off the land and especially old growth areas as a source of food, livelihood, and a way of life.</p>
Michael Murray	<p>I am reaching out to convey my disappointment in the FYSTS plan to log old growth forest, especially around El Capitan and Whale Pass areas. I think these places must be protected to keep Alaska wild and to continue to foster a thriving ecosystem in the Tongass.</p>
Nancy Taylor	<p>I write to urge reconsideration of the plans to log old-growth forests in Southeast Alaska, including the El Capitan and Whale Pass areas. Not only will the devastation of clear-cutting be unsightly for years to come, but the homes near the area will be put at risk from weather conditions.</p>
Rachel Youens	<p>I am writing to you to oppose the sale of land in the Prince of Wales region, including the El Capitan and Whale Pass sales, for clear cut timber logging. Clear cutting this tract of land would leave it barren, impacting nearby rural homes whose residents utilize the forest for many of their needs, like the habitat for deer and other species, and for watersheds nearby. Logging roads would also disrupt the community and are expensive to build for the state. Mature trees and their habitats are Alaska's precious resource to be kept ecologically healthy. They contribute to the local economies of Alaskans, rather than to make short term revenue for the state while making peoples lives more difficult.</p>
Rebecca Lexa	<p>I am writing to lodge a public comment regarding the Five-Year Schedule of Timber Sales in southeast Alaska. While I agree that timber harvesting is a necessary use of natural resources, I am strongly opposed to the harvest of any old growth forests such as the proposed El Capitan and Whale Pass timber sales. As someone who enjoys engaging in ecotourism, I have a particular interest in</p>

Commenter	Comment
	visiting what little fragments of old growth remain in North America, and these places are much more valuable in the long run for their ecological and tourism value, rather than being clearcut for short-term profit. It takes several centuries for a forest to recover from being clearcut, and I do not want a future where there are no old-growth forests left.
Renee Molenda	I am writing to ask you to oppose old growth logging in the El Capitan and Whale Pass areas. These forests are home to delicate ecosystems and wildlife and should not be disrupted. We need to be protecting this planet and wildlife for future generations to enjoy.
Bob Claus	I am opposed to the logging of old growth timber on Prince of Wales Island. The proposed timber sales are an insult to the people who live on the forest, and particularly those in Whale Pass. The short term economic gain provided by the state to a private business, while certainly welcome to these rapacious businessmen, in no way is balanced by the permanent damage to the environment and ecosystems of Prince of Wales Island and the State of Alaska as proposed. The idea that the State has decided to trade its long term responsibilities to preserve resources like old growth forest for future generations for a few dollars now while impacting people who have spent their lives building businesses around intact forests and fisheries is repugnant and a dereliction of duty by the officers of the Division. Even the Governor, no lily livered liberal, recognizes the value of intact forest in carbon sequestration and has a plan to bring money to the state through carbon credits. Perhaps the Division of Forestry ought to get on board and stop these sales now.
Robin Houston	I am writing as a landowner in Haines, Alaska to comment on the department's 5 year timber plan. That plan includes some logging in old growth forests in several places, including El Capitan and Whale Pass. Old growth forests represent critical habitats and unique ecosystems which cannot be reproduced in modern times. Alaska is the state that currently has the most old growth forest acreage. In the lower 48, old growth forests are rare. For example, in North Carolina, the Joyce Kilmer forest is the largest stand of old growth forest and at 3800 acres, represents only 0.01% of the state's total acreage. Sustainable logging is an important resource for states like Alaska. However, this does not need to include tracts of old growth forest—there is ample younger forest that can be logged in a sustainable fashion. Timber interests of course look to maximize profit, and logging old growth does just that—in the short term. But there are consequences to the forest balance, and these short term gains should not rob the public of the long term benefits of old growth forests. Please remove the old growth timber from the forest plan. There is no need or justification for logging these dwindling parts of our national forests, and logging them certainly cannot be justified on the basis of short term financial gain for a small number of logging companies.
Thomas Polatty	Please withdraw the El Capitan and Whale Pass parcels from upcoming timber sales. These stands are functioning quite well in the capacity as a carbon sink and as an ever dwindling ecosystem. You can always sell them down the road when all the other old growth is eradicated as they will bring much more money as a novelty commodity. Yeah they act as a carbon sink, hope you've noticed! The forests are dying, the ice caps are melting. Do the math. Postpone all timber sales, we can always destroy the earth sometime down the road.
Timbi Barron	I definitely oppose logging old growth forest in southeast. This practice decimates wildlife habitat, water sources, subsistence hunting and gathering. For example, on the northern tip of Prince of Wales Island it would threaten drinking water to several communities. No one knows where the potable water comes from and logging could destroy those water sources. This area is primarily limestone and fragile. Old growth cannot be replaced. Second growth is nothing compared to what we'd lose.
Wanda Culp	Cease the two state-borne planned clearcut timber sales in the Tongass Forest until equal and full consideration is provided to the ROADLESS RULE and TRIBAL USE IMPACTS same to the used up industrial methods of last century. The major industrial-

Commenter	Comment
	<p>driven operators with tainted sharp knives posed above our bodily existence for additional cuts, does not comply with the intent of dominant common sense and mandated modern “best practices” from the inside out. Allow us to heal, and we will heal -- as now, today’s reality. It is medically proven that stabbing a vein twice in the same spot for blood access creates uncontrolled bleeding from the already weakened vein exploding. Lawmakers, please do not take your ability to breathe fresh air for granted for it can be snatched away from you without notice, without your ability to control. Deeply personalize your decision-making thinking toward frontline control of own your body to heal through the best knowledge and abilities possible, a healthy balance of abilities. Examining perception from all sides is required today in history’s GLOBAL WARMING CRISIS, priorities for survival mode is now as all life around us are starving and diminishing before our faces. There is no more fat to trim from the Tongass National Forest, whether under U.S. government, state of Alaska, or ANCSA-owned control, self-emaciation must be dying condition of the past. No more slicing and dicing under ANILCA and allow the law to work as originally intended. Clearcut logging is a remnant of last century’s “boom and bust” operations mentality under the disguise of “jobs”, using rusted tools.</p>
Jeanette McBride	Please reconsider your logging plans for the areas around El Capitan and Whale Pass.
	Kosciusko Island East Area
Katie Rooks & Maranda Hamme	SEACC opposes this 345-acre clearcut and 3.3 miles of road building. Again, no habitat considerations for old growth have been taken into consideration by the DOF.
Tessa Axelson	At this time AFA does not support the harvest of Kosciusko Island East in its entirety. Harvest of this area should be based on the input of the citizens of the City of Edna Bay. AFA suggests consideration be given to Edna Bay North instead with the input of Edna Bay residents.
Larry Edwards	<p>The FYSTS proposes to sell mostly old growth from 345 acres on east Kosciusko Island on the east side of Edna Bay in 2025. This sale will require 3.3 miles of road construction. While the sale would occur mostly on Southeast State Forest lands, it does include some Settlement land. The west side of the unit is directly adjacent to the community and the clearcuts from the east side of the unit will be visible from Sea Otter Sound. Defenders requests that you remove this sale from a downscaled FYSTS. The specific problems with this sale are illustrative of why the Division of Forestry should re-evaluate the feasibility of larger timber sales relative to the value of leaving their respective areas intact. Southeast State Forest lands in this proposed sale’s units buffer community viewsheds, include multiple anadromous fish streams and provide some of the little remaining old growth habitat for deer. ADF&G comments in 2015 of the earlier Edna Bay Parlay Sale show the important wildlife value of the small amount of old growth remaining in the area for deer and as denning habitat for bears. There is also the matter that forest shelters the community of Edna Bay, its harbor facilities and mariners from severe windstorms. And log trucks from this sale would intensify traffic on community roads. The majority of past logging on Kosciusko occurred during the 1960s and removed more than 33 percent of the original productive old-growth on the island and at low elevation areas of particular importance for deer. These past removals reduced habitat connectivity and created large contiguous blocks of young growth of up to 1,000 acres in size. The recently logged units, as well as the as yet unlogged Kosciusko East units, occur within beach fringe areas. Scientific experts on southeast Alaska wildlife ecology assert that, per acre, the beach fringe is one of the “two most important habitats for sustaining wildlife populations [in southeast Alaska], and are also hotspots for biodiversity.” Much of the existing beach fringe on southern Kosciusko is already</p>

Commenter	Comment
	non-functional due to clearcutting, increasing the importance of remaining corridors.
	Small Sales
Larry Edwards	The FYSTS proposes to sell 4 MMBF available as “small sales” between 2023 and 2027. Defenders has commented on multiple FYSTS in the past and usually focuses on large sales rather than small sales designed for local mills. However, this FYSTS proposes a larger amount of timber than local operators purchase and in areas that, if all cut, would be similar to large sales in terms of environmental impacts. We request that you downscale these “small sales” in the final FYSTS. There are 5 smaller mills on Prince of Wales Island that processed between 30 a 160 thousand board feet (MBF) and one that processed 500 MBF. The Forest Service provided almost of their timber. The Naukati and Control Lake sale areas have just a few parcels of Southeast State Forest lands intermixed with larger amounts of public land classified for other purposes, including recreation. Both sale areas occur along scenic byways and would impact other forest resources – low elevation deer habitat, multiple anadromous streams, and wolf and bear dens. Multiple parcels abut Alaska Mental Health Trust lands, increasing the importance of maintaining some amount of intact forest across the landscape. Naukati residents, like Whale Pass residents, have significant concerns about the impacts of additional clearcutting on community forest resources. Defenders request that you remove both sales from the FYSTS.
	Gravina Island Area
Larry Edwards	In 2024, The Division of Forestry intends to offer 6 MMBF from SESF lands on Gravina Island. According to the Southeast State Forest Management Plan, there is little information about the actual volume of timber in these areas, but it is likely just pockets of old growth surrounded by recent clearcuts. The Vallenar unit may be mostly younger second growth. The sale would occur in two areas: on the west side of Vallenar Point and in the Bostwick drainage. Timber sale roads will cross Bostwick Creek multiple times, and clearcuts will surround Bostwick Lake, a potentially valuable recreation area. There are questions about project feasibility due to access costs and a need to mobilize a helicopter in order to make the sale feasible. The project area map shows that the Vallenar unit clearcuts will occur along shore, adjacent to eagle nests, and be visible from Clarence Strait. It does not make sense to sacrifice these valuable forest resources, particularly for a large company that will export most of the economic value outside of Alaska.
	Whale Pass: Support
Don & Patty Alsup	This is a letter in support of the timber sale in Whale Pass. After looking at the plan for this timber sale we feel it answers all the questions we have and should proceed.
	Whale Pass: Subdivision Conflicts
Brian Templin	As Alaska’s newest city established in 2017, Whale Pass does not yet have the infrastructure to provide utilities such as water and sewers, leaving them reliant on naturally occurring resources. Clearcutting the land above their homes would negatively impact watersheds used by residents for primary household water. DNR also proposes a 100ft buffer zone between the clearcut and resident’s property lines which raises their concerns about wind throws, blowdowns and landslides directly above their homes.
Bruce	Fails to consider adequate buffers to private and other lands adjacent to the proposed sale area.

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Connery	
Cheryl Fecko	I must also support the concerns of Whale Pass and El Capitan area residents for the proposed clearcuts dangerously close to their property, and those negatively impacting their viewsheds. Hopefully the State will take another look at these proposed sales and reduce unit size and provide the necessary buffers. I realize that the State Forest Practices Act provides minimal protection in these respects but would encourage the State to go above and beyond what is required by these statutes to further the concept of multiple use.
Dawn Waldal-Anderson	Many homes below the track of land in question rely on the watershed from the forest above as their primary household water source. Whale Pass does not yet have the infrastructure to provide utilities such as water and sewer. A number of residents located just below the cut line rely 100% on the clean water from runoff above, which will no longer be clean forest filtered water, but muddy contaminated water coming down from a damaged forest floor.
James Greeley Sr.	want to live without interference and this timber sale is literally in my back yard and disrupting my wellbeing. This current plan is a government overreach with absolutely no benefit for the City of Whale Pass. There are more suitable locations to harvest for your consideration than within the City of Whale Pass. It is in the best interest of all parties including the City of Whale Pass, Prince of Wales Island, SE Alaska, The State of Alaska, and The United States of America to remove the Whale Pass Timber Sale from consideration. Thank you for your time.
Jordan Ebert	<p>The Department of Natural Resources is proposing a shockingly small buffer zone of 100ft between the clearcut and resident property lines. This puts residents at risk for landslides, windthrows and blowdowns right above their homes. Residents didn't agree to have this logging operation right outside their homes.</p> <p>Many homes in the area rely on the watershed from the forest for their household water source because there is a lack of water and sewer infrastructure. Logging would significantly degrade this watershed and once again harm residents.</p>
James Greeley & Kate Bode	<p>This sale doesn't need to happen, it's not a major unit of forest. It's going to take a lot of money to put the roads in to get a very minimal amount of trees. And it's going to disrupt a lot more than just a regular clearcut of the side of a highway — it's next to people's houses. We reside at Block 5 Lot 12 in Whale Pass. The Five-Year schedule of Timber Sales for 2023-2027 as it is currently proposed for Whale Pass (SSE-1378K) stops at only a 100 feet away from our property boundary. A clear cut that close poses significant danger and concern to our residence as well as our neighbors located along the proposed units 1, 2, and 3. One of these units is located on a slope directly above our home and the homes of our neighbors and are within the city limits of Whale Pass.</p> <p>Our home is located at the top of the property and is closely located along the proposed minimal buffer zone (currently at only 100 feet) and is adjacent to a steep slope within the timber sale. A clear cut this close will make our home vulnerable to damage. The minimal buffers adjacent to lots 11, 12, 13, 14, & 15 along with the plan to cable harvest above residential properties would jeopardize the safety and property value to the residences below. We propose eliminating the plan to cable harvest Zone 125, above Lots 13 & 14.</p>

Commenter	Comment
	<p>We propose eliminating the plan to clear cut timber in the area below the proposed road route that is above Lots 11,12,13,14, &15. The road route is on the steep slope above the property boundaries adjacent to Lots 11,12,13,14, &15. (Map Reference BIF Appendix A2 SSE-1378K. Whale Pass Timber Sale Map 1, Unit 1, Unit 2, Unit 3). Disturbance of soil from the heavy equipment of logging and the removal of root systems will inevitably create soil erosion resulting in windthrows, blowdowns, and landslides above our homes. What is most concerning will be the change of water flow coming down the slope from the muskeg above in addition to the potential threat of a landslide during heavy rainfall periods and high winds that often occur from the North. Currently, the timber and existing terrain have provided adequate protection. Clearcutting the area and building a haul road along the slope above our homes with a proposed buffer of only 100 feet is too close and does not take into account the dangers it presents. Unsafe conditions during and after harvest as well as significant damage can occur well into the future. Landslides occur often in Southeast Alaska, most recently damaging roads in Petersburg and homes in Juneau.</p> <p>Whale Pass is a rural community and was established as a city in 2017. It lacks municipal water infrastructure needed to provide utilities such as water and sewer. Many of the homes adjacent to proposed units 1,2, &3 rely on personal subsistence watersheds originating above their homes. The inevitable erosion of soil due to logging beyond the minimal proposed boundary adjacent to private properties will significantly degrade a sustainable water supply for many.</p> <p>We proposed increasing the buffer zones to 600 feet adjacent to property boundaries and subsistence watersheds.</p>
Katie Rooks & Maranda Hamme	<p>SEACC opposes this 300-acre old-growth harvest in its entirety; however, we and the Friends of Whale Pass suggested in our previous comments several ways that the DOF could mitigate the severity of the negative impact guaranteed with this sale, including enlarging buffers on the slope above residences, enlarging buffers around streams, and removing lands that are not Southeast State Forest lands from the sale. No mitigations have been adopted by the DOF to date. The residents of Whale Pass continue to oppose the sale vigorously, as they understand it will kill their town's emergent tourism economy, not to mention harm the property of the homeowners who live directly under the edge of the slope where logging will occur. During the sale planning process, the vast majority of Whale Pass residents submitted comments in opposition to this sale.</p>
Randy & Crystal Toman	<p>Much more could be said about how our community was devastated by COVID like so many others, right in the middle of the process of public input - at one time there was reported 40% testing positive here. The legal process marched on not taking into consideration the setback we were experiencing due to mandates and requirements made on public gatherings. The timing of the last meeting took place as residents were still dealing with the effects of record snowfall and many had not returned to their homes after the unprecedented winter.</p> <p>Our council has stood up for our people against this from the beginning. First by submitting a letter of concern signed by 7 out of 7 council members and most recently by passing a resolution. All of our efforts as of yet to adjust this sale to eliminate this very small track of land has fallen on deaf ears. We are talking about only a portion of the 290 acres slated to be logged in Whale Pass. Surely reasonably minded leaders can see the dilemma we face and show wisdom and mercy.</p> <p>PS</p> <p>I resent the attitude from one of your recent meetings when one of your board members said that we (pertaining to Whale Pass residents) were out of state snow birds that just didn't want to look at a clear cut when they came here for the summer. You are VERY wrong and arrogant pretending you know my neighbors and myself. Shame on your department and the leaders that are</p>

Commenter	Comment
	suppose to be looking out for people. You forget the resources of our great state belong to the people not the ivory tower worshipers and corporations.
Ed Douville	We oppose this 300-acre old-growth harvest in its entirety. The Friends of Whale Pass suggested several ways that the DOF could mitigate the severity of the negative impact guaranteed with this sale, including enlarging buffers on the slope above residences, enlarging buffers around streams, and removing lands that are not Southeast State Forest lands from the sale. No mitigations have been adopted by the DOF to date. The residents of Whale Pass continue to oppose the sale vigorously, as they understand it will kill their town's emergent tourism economy, not to mention harm the property of the homeowners who live directly under the edge of the slope where logging will occur. The vast majority of Whale Pass residents submitted comments in opposition to this sale.
Larry Edwards	Steep slopes abut Whale Pass homes, increasing community vulnerability to erosion and landslides. Residents also fear damage from windthrow and blowdowns. Many residents would not have purchased their property had they been aware of these risks, as well as impacts to local amenity values such as scenery. Other community concerns include impacts to the municipal watershed that provides drinking water, and public safety risks caused by the presence of logging trucks on roads used by residents for walking and cycling. Defenders requests that the Division remove this sale from the FYSTS because of community impacts, and consider repurposing the Southeast State Forest lands in a way that benefits the local recreation economy.
	Whale Pass: Habitat
James Greeley Sr.	The proposed area within the City of Whale Pass is a valuable area for deer habitat and other wildlife habitat. The area from Snoose Creek to 108 serves as a highway for wildlife to cross between second growth stands that are still regenerating. Page 17 of the report states: "A reduction in deer habitat in the immediate area may be expected to result because of the harvest of this timber. Deer numbers are expected to remain approximately the same following harvest and as the stand regenerates but are expected to diminish as the understory is shaded out during mid-rotation; approximately 30 years following harvest." We live on a remote island. Groceries are expensive and need to be barged in and costs have increased. Subsistence is important to the local residents in Whale Pass, especially to our senior citizens and those with young families. Preserving habitat also helps businesses that rely on visiting hunters and fishermen.
Jordan Ebert	The Whale Pass timber sale will harm wildlife and hunting opportunities. The habitat for salmon, Sitka black-tailed deer, and other animals would be significantly degraded and diminished by this logging operation. This would greatly reduce the presence of these species in the area, which would in turn deeply hurt residents. The rural communities of Prince of Wales don't have access to large supply chain grocery stores, so many residents rely on the land for food and livelihood. It's not fair that they should have to go hungry or lose their way of life so other people can profit off logging the land.
Toni Androski	Dog-hair stands rob people and wildlife of the resources that they need to survive. Community members in Whale Pass have made their stand against continued old-growth logging.
Larry Edwards	Whale Pass residents depend on local forests for fish and wildlife values. The planned clearcut will also destroy riparian habitat near 108 Creek, one of the last remaining healthy salmon streams in an area, and there are few other alternatives for harvesting subsistence salmon. There is also considerable other recreational use at 108 Creek. Declines in deer populations over the past decade heighten the value of remaining old-growth forests. The project will also remove old-growth timber in important areas connecting low-elevation beach habitat with higher elevation areas.

Commenter	Comment
	Whale Pass: Traffic & Safety
Brian Templin	<p>Residents also express concern for safety on their roads during the logging process. Whale Pass is the last community on the North end of the Prince of Wales Island road system, but the last 8 miles into town have not yet been paved and consist of single lane roads with many blind corners, narrow bridges and limited pullouts. This steep terrain has many drop-offs, often along water. With the majority of the population being elderly and children, there is grave concern for safety as residents also use these roads for walking and bike riding on a regular basis.</p>
Dawn Waldal-Anderson	<p>Residents also express a concern for safety on their roads. Whale Pass is the last community on the North end of the Prince of Wales Island road system, but the last 8 miles into town have not yet been paved and largely consists of single lanes with many blind corners, narrow bridges and limited pullouts. The steep terrain has many drop-offs, often along water. With the majority of the population being elderly and children, there is grave concern for safety as residents also use these roads for walking and bike riding on a regular basis.</p> <p>DNR has proposed a mere 100ft buffer zone between the clearcut and many of the resident's property lines which raises concerns about windthrows, blowdowns and landslides directly above their homes.</p> <p>All in all, these decisions are said to be made in the "best interest" of the public. But Whale Pass, in no way will see any kind of benefit from this sale. Not from jobs, not from an economic standpoint, and certainly not by improving our way of life or by preserving the natural environment.</p> <p>Whale Pass is not opposed to the logging industry as a whole, but when it happens so close to homes and damages not only the land above full time residents, but the fledgling economy and safety of citizens and visitors, we feel there are enough trees elsewhere and that the powers that be should consider our concerns as well.</p>
James Greeley Sr.	<p>This current proposal is putting residential homes and lives in danger, especially for those that live in the subdivision below the steep slope area in lots 15, 14, 13, 12, 11, 10, S, 8, near the 108 creek. On page 12 of the report, it states: "Soils observed to be thin, organic horizons with moderate to poor drainage." The Preliminary Best Interest Report is vague when addressing these concerns of soil instability and erosion. The report fails to specify the location of this finding. Which private lots were observed? How were the observations made, when and by whom? What were the conditions when the decision was made? Was there an individual/team that walked the ground, or was the observation made just by flying overhead by airplane? During heavy rains that occur throughout the year, water can be seen flowing from the steep slopes and passing through residential properties. Intense disturbances and development to the soil from heavy equipment poses a risk of instability and extreme danger to the residents below. The report states that "it is expected that overall flow ins streams will increase post-harvest (Page 20). "this report contradicts its own findings and logic. Please avoid road construction that could set off dangerous erosion issues to the adjacent properties below.</p> <p>An impact study needs to be made available with specifics. Conducting field inspections during harvest is not enough to ensure safety needs are met as it may be too late to address hazards that can occur with accidental irresponsibility.</p> <p>Landslides/mudslides are common on Prince of Wales Island, with many happening in other communities on the island in the last few years.</p> <p>The proposed harvest site, roads, and boundaries are extremely close to property owners and is a cause for serious alarm and danger. Building roads can dam up natural water runoff from the steep slopes behind adjacent properties.</p> <p>Windthrows/Blowdowns will be a greater risk as well to homes and structures to property owners on the boundary lines.</p>

Commenter	Comment
	<p>Without the existing trees serving as a barrier of protection, these homes (and the people inside) are being put at dangerous risk. Destruction to property and possibly life leads to expensive litigation if a disaster were to occur as a result from this sale. Increased log truck traffic puts pedestrian safety at immense risk. This is a small community where many residents, including children, often walk/ ride bikes on the road with friends, family, and pets. The road is narrow with many blind spots and already is a safety risk for both vehicles and pedestrians. An increase in log truck traffic adds to that risk. A large clear cut within the center of the city of Whale Pass will deter potential home and property buyers. A clear cut in the middle of town will change the natural scenic aesthetics that has drawn visitors and residents alike to this place. Old growth timber is valuable to residential property owners and a draw for tourism income.</p> <p>Please avoid building roads that could set off dangerous erosion issues to the adjacent proper. Please do not build roads that will cost more than the timber is worth.</p>
James Greeley & Katie Bode	<p>The current proposal authorizes use of USFS roads throughout our community. This potentially allows log truck traffic to operate through residential areas of Whale Pass. The road is a thoroughfare to community hubs and is largely one lane, contains multiple blind curves and one lane bridges. The increases traffic pertaining to the sale and haul route through the heart of the community would impose significant danger to the citizens, children, senior citizens, visitors, & pedestrians traveling on the road. An accident would realistically constitute as “reckless endangerment.”</p>
Marcella Bode	<p>Why is this still an option! The residents don’t want it. It’s dangerous for the people in the area with the possibility of landslides! The trees are vital for the deer population and for the clean water that is needed by inhabitants! If you must cut, surely there are other, more remote areas to harvest. I don’t understand the callous behavior and disregard for the lives and wishes of the Alaskans that live in the area! Shame on you!</p>
Michael Kampnich	<p>Appropriate consideration has not been given to the people of Whale Pass who face the prospect of significant OG harvest on the hillside above west Whale Pass. This is a direct impact on their quality of life, property values and for those directly beneath the proposed sale in West Whale Pass, possible property damage and/or personal injury. Over the past 30 years, Prince of Wales has experienced a number of extreme weather events that have resulted in slides that have caused damage to property, blocked roads and significant stream degradation, across the island. The majority of these slides have occurred in stands of YG timber. Again, it was predicted decades ago that stands of YG on unstable hillsides would be vulnerable to slides, during extreme weather/rain events.</p>
Randy & Crystal Toman	<p>Many homes below the track of land in question rely on the watershed from the forest above as their primary household water source. As Alaska's newest city established in 2017, Whale Pass does not yet have the infrastructure to provide utilities such as water and sewer. DNR is also proposing a mere 100ft buffer zone between the clearcut and resident property lines which raises concerns about windthrows, blowdowns and landslides directly above their homes. Residents also express concern for safety on their roads. Whale Pass is the last community on the North end of the Prince of Wales Island Road system, but the last 8 miles into town have not yet been paved and largely consists of single lanes with many blind corners, narrow bridges and limited pullouts. The steep terrain has many drop-offs, often along water. With the majority of the population being elderly and children, there is grave concern for safety as residents also use these roads for walking and bike riding on a regular basis. This timber sale will ultimately bring down property values. Noise pollution from trucks and equipment day after day will deter visitors who fish near popular spots along the roads and narrows bridges and may lead to a decrease in vacation rentals within the city.</p>

Commenter	Comment
	Whale Pass: Economics
Brian Templin	The majority of Whale Pass residents are not opposed to responsible logging, but clearcutting this particular contiguous stretch of old growth would negatively impact the community's economy, viewshed and way of life in ways it will take many years to recover from. POWCAC stands in support of Whale Pass' efforts to reverse and/or modify the decision regarding units 1, 2 & 3 of the Whale Pass Timber Sale SSE-1378-K.
Bruce Connery	The proposed Whale Pass sale-harvest would not support current and future local resident's economic interests for tourism nor does it appear to help with the declining deer population that residents depend on based. Further harvesting above or too close to private lands could harm landowners' property values and possibly cause physical damage. These deficiencies are combined with a steady pattern of logging and road building on multiple owner's lands and collectively these are diminishing, fragmenting, and depleting old growth forests on Prince of Wales. For these reasons, the Whale Pass sale as other planned harvest sales should be removed from consideration until there is clear evidence cutting old-growth forests has addressed the concerns and shown harvesting is good for all interested parties.
Dawn Waldal-Anderson	This sale would devastate the view of towering old growth on the hillside that is a predominant view when visitors come and pay for the Alaska experience. A clearcut in this location would leave visitors with a less than ideal impression of how the State manages the balance between natural resource development, environmental impact on its people, wildlife and unparalleled majestic scenery.
James Greeley & Katie Bode	If the state views this proposal as "the best use of its resources" then it has failed to see what this area already is. A home for rural residents of Whale Pass and citizens of Alaska, by means of existing clean watersheds, natural protective barriers, and a safe place to live. Whale Pass is also a pristine place to visit and draws many visitors every year. Tourism has brought sustainable income to the local economy. Clear cutting the bay view hillside will hurt the businesses in our community.
Randy & Crystal Toman	The Timber Sale (SSE-1378-K) will negatively affect our community's economy, and way of life in ways it will take many years to recover from long after the log trucks have gone. We have been communicating with DNR non stop trying to get some understanding of our situation and you have heard us but you have not listened to us. All we are asking is to move your sale to a different location other than right above our homes and drinking water. You have marched on showing no concern to our situation. You think you are representing the good for all the state as a whole but that is just the front you put on to keep ramming this down our throat, again no one is saying, don't log just move it to a location that us lowly peasants aren't so affected.
Larry Edwards	Most of the logging will occur in one large unit directly above the community in the midst of the incorporated town of Whale Pass. The Whale Pass sale is controversial and opposed in the local community. Whale Pass residents fear adverse impacts to fish streams, to property values and safety (because of proximity to residences), to erosion and water quality, to wildlife habitat, to scenery and aesthetics. Concerns include increased wind damage and mudslides, as well as traffic and noise — and in all respects, safety. Residents will receive no local economic benefit from the loss of their remaining old-growth forest but will suffer harms to the local visitor economy. 110 Adverse impacts to the recreation and tourism industry that supports the local economy will occur when visitors view the new clearcuts from airplanes, the road system or while traveling through Whale Pass in kayaks and canoes.
	Whale Pass: Tourism
Brian	POWCAC supports The City of Whale Pass in its position to oppose a portion of the Timber Sale proposed by DNR (SSE-

Commenter	Comment
Templin	1378-K) and in its efforts to reverse and/or modify the current decision. The section of proposed Timber Sale (units 1, 2 & 3) that Whale Pass residents are concerned about consists of 292 acres of old growth positioned directly above homes within the city limits of Whale Pass. This sale would devastate a large stretch of viewshed and a fragile tourism economy by clearcutting a prominent bay view hillside. Whale Pass' limited economy relies on tourists who come to Alaska to appreciate its natural beauty and pristine environment.
Caroline Hemp/ Rep. David Ortiz	I am writing to you today regarding the Whale Pass Timber Sale SSE-1378-K proposed by the Alaska Department of Natural Resources (DNR). I am currently the state representative for Whale Pass and am very familiar with the area and surrounding area. The proposed sale consists of approximately 290 acres of old growth, but I am only concerned with units 1, 2, and 3. Those units are located directly above homes within the city limits of Whale Pass and are in clear view of the bay entrance. Whale Pass is Alaska's newest established city as of 2017 and does not yet have the infrastructure needed to provide utilities such as water and sewer. Residents rely on naturally occurring resources. However, clearcutting the land above their homes would negatively impact the watersheds those households primarily rely on. The proposed 100-foot buffer zone also worries residents about the potential for wind throws and landslides directly above their homes. Because of the noticeability of units 1, 2, & 3 in the proposal, it would likely negatively affect the Whale Pass visitor industry: the tourism economy, which is predominant and necessary in Whale Pass, is made up of visitors who are eager to see pristine Alaskan nature. Clearcutting a prominent bay view hillside would certainly, be detrimental. While many people voiced their concerns at the meeting held by DNR this past fall, they also clearly stated that they are not opposed to responsible logging. I, along with many Whale Pass residents, am not anti-logging. However, we do hope that these specific units are reconsidered. I look forward to hearing DNR's future plans after taking into account the public comments provided by many Alaskans.
Katie Rooks & Maranda Hamme	The proposed activity will be a negative factor in transactional long term property values and tourism. Many of the homes and recreational businesses did not exist 30-50 years ago when the Whale Pass area was being harvested. Now, a large clear cut operation In the heart of Whale Pass, would negatively affect these businesses and homes. Life In Whale Pass has changed from the past. This is largely due to the many years of logging inactivity within the community. The old logging camps have moved on and have been replaced by recreational businesses like vacation rentals, hunting and fishing lodges. There is a growing residential community with young families that attend school here as well as a strong retirement community. With this change, it is sustainable recreational tourism that has higher property values and a growing community that supports it. Just as recently as 2017, the people of Whale Pass voted to become a second-class city. The second growth stands have grown along with the existing old growth habitat and serve a purpose to attract visitors and potential home buyers within the city. In short, things have significantly changed from the past.
Jordan Ebert	The Whale Pass logging would also make the hillside look very barren, industrial, and unsightly. This would be bad for residents who look at the hillside every day, as well as for the tourism and recreational industries in the area. Tourists and recreationists will not want to come to a place where natural Alaskan beauty has been cut down. The lack of tourism and recreation will in turn hurt the local economy and residents.
Randy & Crystal Toman	Whale Pass was originally a logging camp and support for responsible harvesting of local timber is not something we oppose, but units 1, 2 & 3 are of great concern. This sale would devastate the view of towering old growth that blesses our fragile tourism economy. The hillside is a predominant view when visitors come and pay for the Alaska experience of pristine wilderness get away. A clearcut in this location would leave visitors with a less than ideal impression of how the State manages the balance

Commenter	Comment
	between natural resource development, environmental impact on its people, wildlife and unparalleled majestic scenery.

	PROGRAMMATIC
	Support for Timber Sales
Marc Martinsen	Born and raised in Petersburg Alaska, I fully SUPPORT any logging, timber sales this agency can provide.
Klayton Curtis	I support logging on Prince of Wales Island, but only on the second growth tracts.
Tessa Axelson	AFA would request that DOF consider offering all available volume at remote locations at one time. Remote locations listed in the 2023-2027 FYSTS include Heceta Island, Earl West, Suemez and Woodpecker Cove. Without a broader grouping of these sales it is highly unlikely that the individual sales, at such small volumes would be economically viable for operators to purchase.
	Carbon Sequestration/Carbon Credits
Brenda Right	Recently Governor Dunleavy, during his state of the state address said: "The state has requested proposals from prospective consultants "to investigate the potential for a carbon offset credit program based on carbon sequestration on state lands." How can any clearcutting of old growth forest bring more capital to the state than carbon sequestration? This is a win-win situation. The very few acres of old growth, if left uncut, will benefit the ecosystem and the state economy. Please compare the bottom line before losing this extraordinary asset.
Bruce Connery	What is missing is how FYSTS is involved or incorporated in the Governor's talk and efforts to use forest resources in the carbon credit market, specifically since contiguous old-growth and older second-growth forests are reported to be high levels of carbon storage and thus are of higher value in contributing to this goal. As such, the inclusion of old growth parcels on Prince of Wales could add to carbon values to this goal.
Chris Kent	Governor Dunleavy statements about carbon capture and sequestration. Harvesting old growth timber removes large organic carbon storages devices. Studies on the harvesting of Old Growth timber have shown a net release of carbon when harvested. New growth (what comes in after harvesting) is not as efficient at maintaining a carbon balance. Past harvest activities by the U.S. Forest Service, DNR and Native Corporations have fragmented old growth habitat and cause the loss of deer population due to young growth impossible to walk through and barren of understory forbs that support deer. I urge you to forego Old Growth harvest in favor of carbon credits. The division of forestry should support and urge a transition to second growth harvesting and thinning. Avoiding old growth harvesting best protects water quality, habitat fragmentation, and provides a source of revenue if used for carbon credits and scenic quality for out of state visitors.
Helen Unruh	Remove Carbon Dioxide from the atmosphere, store it in their cells and the soil surrounding the trees. They have been removing carbon dioxide from the air for centuries. Cutting these trees will release much of this carbon dioxide into the atmosphere. It doesn't make sense to me, to on the one hand (Gov. Dunleavy's plan) to sell carbon credits by injecting carbon dioxide into the earth (does this work? what holds it in the ground?) while on the other cut the trees where carbon dioxide is stored and release carbon dioxide into the atmosphere! duh! How does this make sense? Alaska is releasing lots of Carbon Dioxide into the air as the permafrost melts.....lets not make it worse by cutting these centuries old trees! We don't seem to have control over the melting permafrost, but we do have control over the Old Growth Forest. It is amazing that we still have these Old Growth Forests..... in the lower 48 there are few if any remaining.... a few area of

	redwoods.....& sequoias..... These trees should be protected. They not only store Carbon dioxide, they have provided a habitat for wildlife for generations/centuries!
Maranda Hamme & Dain Myers	Given the importance of Southeast’s remaining old growth forests as wildlife habitat, including the protection of salmon streams and sitka black tailed deer habitat along with the many other species that rely on old growth, its importance to subsistence users, culture, and its value in sequestering carbon, I urge DNR to further investigate carbon market options for the Southeast old growth sales.
James Greeley & Katie Bode	The FYSTS offered no discussion on Governor Dunleavy’s recently announced plan to enter the carbon credit market. The DOF should include the 300-acre Whale Pass Timber Sale (SSE-1378K), perhaps with other state forest units on POW, to add value to the proposed pilot carbon credit projects. Also, this may benefit in decreased costs to the State in terms of road building, inspections, and transport during the timber sale. Include Whale Pass in a carbon credit program or abandon the project.
Katie Rooks & Maranda Hamme	The FYSTS offered no discussion on the Governor’s recently announced plan to enter the carbon credit market. According to the DOF (A. Arians, pers. comm.), Southeast Forest lands were included in economic projections in the recent Anew Climate report, ⁴ which was commissioned by the Governor to outline his vision for forest carbon offset programs in Alaska. Because of the rarity and higher value of contiguous old-growth and older second-growth forests in terms of high levels of carbon storage, both in soil and above-ground biomass, Southeast Forest lands would realistically be expected to add value to a carbon project such as the pilot project the Anew report describes in Haines State Forest. Even if some areas are deemed less economical for logging, old-growth trees in southern Southeast tend to have more value than old growth further north. SEACC encourages DOF, the Legislature, and/or others to investigate potential carbon offset revenue baselines for high-quality old-growth parcels being considered now for harvest on their holdings in Southeast. PROPOSAL: The DOF should include the 300-acre Whale Pass parcel, along with other state forest units on POW, to add additionality value to the proposed pilot project in the Haines State Forest. If the Governor’s Anew Climate report included southern Southeast Forest lands in its economic projections, this is an opportunity to learn more about the full potential in a pilot project. Analyzing whether the addition of this particular parcel into the pilot project could add additionality may prove worthwhile; also, the benefit in decreased costs to the State in terms of road building, inspections, and transport during the timber sale.
Phyllis Hackett	I am confused, please clarify for me. Alaska’s Governor has just come out with his new “Carbon Bills” as a way for Alaska to generate millions of dollars. One of those bills would allow companies to pay to preserve forested land from logging and development to offset the greenhouse gas pollution they create. By this action the Governor clearly recognizes the environmental dangers created by taking away our forests that are a prominent contributor in the battle against climate change that is eroding our earth day by day and not only costing our government millions of dollars but wreaking havoc on our lives. And now, at the same time as this interesting and creative move by our Governor, you have just released your Five Year Schedule of Tiimber Sales (FYSTS) Plan for Southeast Alaska. Offering to take away the very asset we hold to help the earth we live on to heal. This is a very clear example of why our country seems to possess a lack of knowledge, understanding or willingness to recognize a picture beyond our own relatively small scope view. It doesn’t pass the “red face” test, even with me, a devoted American and 50 year Southeast Alaska resident. How could I ever explain it to my children, let alone my international friends and family? If every US Department works solely in a vacuum with disregard our knowledge of what the others are doing, as toddlers

	parallel playing before they gain the ability to play together, we will never grow up and take responsibility for our actions. We owe it to ourselves, our fellows countries around the world and the earth to take responsibility and halt "business as usual". You are smarter than you seem and certainly have the resources to think outside your box to create a plan that satisfies your mission while still honoring the peoples that live in the regions your decisions effect, the great state of Alaska, the world and the Earth. Please do so. I will look forward to hearing what you can come up with when you really try.
Victoria Kulikow	I am writing to encourage the rejection of further old-growth logging in Alaska. It is time to explore and innovate new areas for the industry and leave these important carbon-sink forests in place. At this time, the government should be working to protect areas that sequester carbon and not sell them off for convenience and the profit of a select few.
Ed Douville	The Five-Year Schedule of Timber Sales has no information on the Governor's recently announced plan to enter the carbon credit market. Which was a surprise when reading the schedule for Southeast. Especially since the contiguous old growth and older second growth forests in Southeast Alaska are rarer and have a higher value. They are able to store high levels of carbon, both in soil and above ground biomass.
	Anti-Logging
Abby Pariser	I oppose logging old growth trees.
Adrienne Kasheta	The forests in SE Alaska are as important globally as the Amazon, they are the lungs of the earth.
Allegory Smith	I want to add my voice to the effort opposing the allowance of old-growth logging in the Tongass forest. Subsistence harvest is important; forest and fire cycles are important: the demands of a profit-driven economy will not respect their importance, nor will it be satisfied by the deaths of more ecosystems in objectifying and commodifying them. I do not need more products to consume. I am sustained by relationships, and I need the Tongass alive and thriving to maintain our relationship. We all need each other.
Angie Dixon	I used to commercial fish for salmon in SE Alaska in my younger years and I saw the devastating effects on the salmon runs from the logging and mining that had already taken place back in the 1970's and 1980's. WE CANNOT AFFORD TO DESTROY ANY MORE OF THE FOREST! I emphasize this because it is true. Alaska has what is left of the vast Pacific Northwest forests. They are ALL decimated except for postage stamp parks and a few other areas. Alaska has what is left of a tremendous ecosystem and is still life sustainable because it is still whole. It gives us food, clean air and clean water because we leave it alone and so far have been relatively careful about how much we take - at least in the fishing industry due to limited entry permits - to keep places and species from being overfished. At this point, keeping ALL of Alaska's land, water and air untouched is vital to the health and well being of us all if we want to actually live on this earth. It has come down to the arctic and Alaska to keep this earth healthy and functioning. What I say is true and you need to step up to the reality of this and stop the commercial destruction of what remains of what we truly need to survive and live on this earth - whole functioning ecosystems which includes old growth forests that is the Tongass. We have to respect our fellow species because we ALL need each other. They are not just ours to destroy. Shame on us when we do so. So NO TIMBER SALES for a very very very long time. We have to replenish what we have taken. The timber companies will argue about jobs and other things, but there will be no jobs when the trees have all been cut down and everyone living on this earth pays the price for the few who made large amounts of money from the death and destruction of the trees and every other species that depends on them. This is true. You have to think bigger and of the consequences of the destructive actions we take today. I am terrified of what I see happening as the result of our greed, cruelty and selfishness. Do better than our old habits of destruction and excuses for it! You can and must do better! We ALL have to do better or we will lose everything! This is

	true too. Keep the Tongass and the rest of Alaska intact. It is our saving grace on this planet and this is true too. Step up to protect and Preserve Alaska land, water, air and biodiversity and whole functioning ecosystems.
Annette Coomber	I am writing to tell you that I am TOTALLY OPPOSED to the OLD GROWTH TIMBER SALES. PLEASE do not log these forests... PLEASE PLEASE SAVE THEM FOR OUR CHILDREN'S CHILDREN'S CHILDREN!!!
Barry Santana	I am opposed to the ADNR proposal to log old growth timber in SE Alaska. This administration is so short-sighted on resource development that it will take several generations to recover if ever. Why are you considering exploiting carbon capture in the Interior and actually proposing to log real forests in SE that would qualify? Have you no logical thinkers in the department?
Beryl Arnot	I vehemently oppose all logging of our precious, sacred old growth forests in Southeast Alaska...
Bo Warner	Do not log old growth forest. There is so little left and it is extremely important.
Bob Stone	I am opposed to the continued logging of the remaining old growth forests. Rather than being short sighted look long term and protect the small percentage of old growth that remains.
Catherine Croom	I am not a resident of Alaska, although I have visited Southeast Alaska and enjoyed the beauty of the old-growth forests. I am an advocate of these old-growth forests and those people and animals which would be badly impacted by logging in Southeast Alaska. Logging old-growth forests negatively impacts residents who rely on the forests to hold back landslides, provide water to households and salmon streams, habitat for deer which are the main subsistence animal in the area and on view sheds which attract visitors. I oppose plans to log old-growth forests in Southeast Alaska.
Charlie	Forests at best are meant to be gleaned, only taking a small part from different areas. Forests are a connection to all life and provide us with reality, not manmade weakness. Removing the trees is as bad as a person shooting people at random, it all has the same result, ruin.
Cherie David	The destruction of old growth forests is wrong, you know it and I know it. Let's do what is right and start protecting our trees, they are precious. Old growth forests take centuries to grow, if you allow their destruction you contribute to the environmental problems we have and take away our heritage. We are entitled to have these forests, they're part of who we are.
Christine Niemi	We need to protect our old growth Tongass trees that give us clean air & water. Do not allow them to be cut down. They are more valuable to our residents as our living Tongass.
Brian Gingras	Old growth trees should not be logged. They harbor vast quantities of carbon dioxide. Cutting them down will severely increase climate change.
Clara Bauman	I am writing to encourage the DNR to look towards the future when deciding to leave one of the few old-growth forests we still have alone. The trees deserve to live and we benefit from that!
Don Muller	NO MORE OLD-GROWTH LOGGING IN SE ALASKA EVER AGAIN. Not one tree. As of now. Will you never learn?
Donna Mulvey	Thank you for the work you do. I oppose old growth logging in the southeast
Dru Sorenson	I oppose all timber sales.....In Haines Alaska the Haidas have made the last traditional native canoe out of old growth cedar 10 years ago. There are no more old growth cedar. Dead timber should be for the public to burn or get permits for live to build houses. Not for profit.

Glen Anderson	<p>SHAME ON the Division of Forestry for logging old-growth forest in Southeast Alaska!!!!!!!!!!!!!! You are enemies of the environment – enemies of God’s Beautiful Creation. I implore you to STOP selling and cutting old-growth forests on Alaska’s Prince of Wales.</p> <p>I understand Alaska’s desire for making money from forests. But OLD GROWTH FORESTS are ABSOLUTELY NECESSARY for the integrity of ecosystems. When you consider your Five-Year Schedule of Timber Sales (FYSTS) for 2023 to 2027 for the Southeast area, I implore you to STOP or at least sharply reduce logging in old growth forests.</p>
James Mackovjak	<p>The history of logging on national forest lands, Native corporation lands, and Alaska agency lands in Southeast Alaska is largely a history of abuse--a "cut-out-and-get-out" program that mostly converted our magnificent old-growth forest into wood pulp and logs for round-log export to Asia. I notice that out of the 61.8 mbf of timber scheduled to be cut under your plan, only 10 mbf is classified as young growth. Another 10 mbf is classified as "mix," which does not specify the estimated percentage of old growth, while another 2 mbf is "to be decided"--whatever that means. In essence, fully 2/3 of the timber proposed to be cut is old growth. Given the importance of Southeast Alaska's remaining old-growth timber as wildlife habitat, including the protection of salmon streams, its importance to subsistence users, and its value in sequestering carbon, I urge DNR to delete these areas from its timber sale schedule. That said, I have no objection to limited, small-scale, selective logging of old-growth trees along the existing road system provided they are milled locally and for local utilization.</p>
James Taggart	<p>I ask you to reconsider the logging of old growth forest in the Tongass national forest. As the father of a 3-year-old daughter it is my job to protect her and part of that is to protect her future. The logging of old growth forest not only robs her of the beauty and majesty of these increasingly rare trees but also directly endangers her future by the effects of climate change.</p> <p>Old growth forests lock up tons of CO2 and are a key part of mitigating climate change, and all the societal ills that come with an ever-warming planet. So I ask again, please to not cut down this critical natural resource.</p>
James Unger	<p>I’m just an old guy from Portland, Oregon. I encourage you to protect our old trees.</p>
Jamie Corson	<p>I am writing to oppose any old growth logging - specifically old growth logging planned for 2023 and beyond. The future of the planet is more important than your deep pockets or government spending. Stop cutting down our climate protection. Thanks for being responsible. Now do the right thing.</p>
Janet Colon	<p>With Climate change destruction, all over the world, shouldn’t we be saving trees instead of destroying them. Why take from the Tongass? Please consider another source of revenue, we need big trees now more than ever. It’s that simple.</p>
Jeri Rosenthal	<p>I am so fully in support in protecting what is left of our old growth forest on Prince of Wales Island Southeast Alaska. This island has suffered so greatly from clearcutting and poor forestry practices. I have lived on this island for 30 years and in Alaska for 43 yrs. I oppose more cutting of old growth and what to see future generations be able to walk through those woods and feel the power and health of those forests not wastelands of clearcutting (only for profit of a few).</p>
Jerome Hofhenke	<p>I believe that protecting the old-growth forests of Southeast Alaska is vital to mitigating the effects of climate change. Therefore, I am opposed to old-growth logging in Southeast Alaska.</p>
Jerry Banks	<p>Please stop logging the old growth trees. They are more valuable than mere money. Please do not log old-growth forest in Southeast Alaska. This timber is more valuable living where it is than as timber.</p>
Jill Wittenbrader	<p>I oppose any timber sales on old growth in Alaska.</p>
John	<p>I oppose old growth logging as included in the timber plan in Whale Cove and elsewhere. Leave the old growth trees intact they are</p>

Rosenbaum	a great basis for tourism in Alaska and should not be cut because they are just shipped to China to make toothpicks and other not important activities. The people who claim the trees will just rot or burn are so wrong and please leave the trees alone and don't let the men cut them.
Jonathan Greene	Watched it go flying up and down the West coast. From Haines, Alaska to The Angeles national Forrest. It didn't come back. The logging keep going. Now with climate change and the obvious mistakes made by the Department responsible; the rest is burning up. This ,right when we need the carbon sequestration and the protection of intact forest habitat and bio-diversity, in a critical juncture, of our future. "First do no harm". " Be good stewards of the Earth ". " don't it ALL WAYS seem to go, that you don't know what YOU GOT till it's gone'. Be Good Stewards of the Earth. Defend every square inch of WHAT'S LEFT. Fight the GOOD FIGHT.
Kay Kreiss	With our climate emergency in mind, I urge restraint on cutting any old growth timber in the Tongass. We need its carbon sequestration and there is no way that reforestation provides the same benefit. Our atmospheric carbon dioxide levels continue to increase, year by year, warming the earth and hurting our own state with permafrost melting, glacier calving, and coastal erosion. If we don't protect our own carbon reserves, who else will do it? Please stop timber sales in Southeast Alaska from 2023-2027. No economic gain is worth the catastrophe that humans are bringing on themselves.
Kendall Van Horssen	I'm writing today in opposition to the State of Alaska's plan for continued logging through 2023-2027. Continuing to log virgin old-growth forests destroys what little pristine habitat the world has left for the short-term profit gains of a few. Logging from regrown new-growth forests that have already been disturbed is a better alternative to destroying wild places that harbor so much diversity. I'll allow others to better elaborate on the importance of this but wanted to make sure another voice was heard that is advocating for keeping forests that are still untouched, untouched.
Lenne' Musarra	I have been involved with Boy and Girl Scouts for over 25 years. I have hiked, climbed mountains and enjoyed old growth forests my whole life. I have lived in Kodiak 7 years and Juneau 15 years. I have worked with Alaska Native Elders, children, and Families. For the sake of our ancestors, children, grandchildren, and the animal and plant life that inhabits these sacred spaces please refrain from clear cutting in SE Alaska. Alaska is the last Frontier. Please allow it to remain unscathed.
Lori & Mike Baur	I strongly appose logging in general but seriously appose old growth logging. SE has been over logged in my opinion. You can't go anywhere in a boat and not see the unsightly clear cuts. The animals deserve their natural habitat.
Lucas Mesdag	Timber sales seem to be such a poor use of resources. There are many (like myself) that travel simply for the beauty and remoteness of the region. The poor quality pulp that results from these sales are simply not worth it. Please stop these timber sales.
Lydia Garvey	Your attention to his most urgent matter would be much appreciated by all present & future generations of all species! You are blessed to have precious World Heritage wild lands, Keep them that way! Respect Indigenous peoples & do your part to limit climate change!
Marika Hintz	Please stop logging old-growth forests in Southeast Alaska. There is very little old growth forests left in the world, and they play an essential role in our climate and ecosystem health. We have other options.
Matt Richardson	We are in a climate crisis. It's affecting all of us, from California to Texas to Alaska. Please adopt a NO Old Growth logging policy. It's clear that old growth forests sequester the most carbon from the atmosphere. Young trees take years to grow to a point where they can sequester any substantial amount of carbon from the air. Additionally, the largest trees, when cut down, will also emit the most amount of carbon. You may not be feeling the change in the air in SE Alaska, but they sure have in central and NW Alaska. We do need smart thinning. People do need to work. But seriously, stay away from the Old Growth. Literally, the whole

	world is watching old growth forests on every continent.
Kelly Kramer	PLEASE PROTECT OUR STRIPPED FORESTS
K. Murphy	Having studied and worked in Forestry for 35 years I stand opposed to any further logging of Old Growth trees. I've watched them completely disappear from Montana, Oregon, and Washington. In fact, less than 1% of old growth remains in the U.S. Alaska still has a chance to get things right and end this barbaric process. Make a difference.
Michael Thompson	I'm disturbed by the states plan to continue logging the remaining old growth forests in southeast which are necessary to foster a healthy sustainable ecosystem enhancing wildlife habitat and provide/preserve subsistence hunting/fishing and recreational activities/opportunities! As forest management professionals you hopefully already know and understand this and what these remaining old growth forests attributes provide standing and adequate second growth harvestable opportunities are available and sustainable without harvesting the irreplaceable old growth trees! Please consider other sustainable second growth harvest opportunities available and leave the precious remaining old growth forests standing which continue to provide valuable habitat and prolong healthy and productive/thriving ecosystems for the enjoyment and protection for all types of local communities/subsistence users like myself in Haines, Alaska and future generations.
Michelle Breinholt	I can't believe in this day and age at this time of climate change and it's erratic weather events that you would be considering clear cutting ANY trees much less old growth. Old growth forests are scientifically proven to be so important to the planet that not one tree should ever be taken again. Since moving to Alaska four years ago, I sometimes feel I have moved to a third world country where every sense of advancement is ignored and moving backwards and greedy white men are the ruling party. Old growth trees are essential for removing CO2 from the atmosphere we have polluted, trees of any kind are essential for keeping soil in place. Do you really want to risk mudslides ruining people's homes and property? Do you really want people to see ugly patches of bare earth when they come to visit from the lower 48? Is that what Alaska is to you? Just a giant resource to be plundered.
Mike Konsler	I am an Alaska resident of 30 years. I want to go on record as an opponent of proposed timber sales that will adversely affect private property and wilderness habitat, including salmon streams and deer habitat. If you were selective logging with mules it might be OK, but I know what a clearcut looks like.
Mitchel Meyer	Hello, it is important to see how needed the old growth is in not only southeast Alaska, but as the state as a whole. The size of Alaska accounts for a major portion of timber still standing in the US and that's only thanks to the preservation and content attention given to protecting the Tongass. Stop logging and protect the little timber we have left for future generations to be able to enjoy.
Morgan Hole	I oppose old growth timber sales in southeast Alaska.
Nick D'Alessio	Please do not include old growth trees into the five-year schedule of timber sales. I oppose any old growth trees to be logged. They are too important for many reasons.
Paul Davis	We cannot recreate Old Growth forests once they are cut down. Traditional aboriginal activities are not supported by stumps, nor are salmon or wildlife. Seen any tourists taking pictures of stumps on Stump Tours? Nope!
Pyper Thaller	I oppose the sale of old growth timber in Southeast. As a resident of Juneau and an avid hiker and outdoor enthusiast, the value of our trees to tourism and our environment is paramount. Old growth trees take care of far more carbon dioxide than saplings- we need more of them, not less!
R. Eric Jones	There is only one reason to log old growth.....MONEY. There are many reasons for not logging old growth.....maintaining biodiversity/increasing carbon sequestration/preventing further extinction of flora and fauna/reducing

	the negative effects of climate change/ restoring the carbon dioxide-oxygen balance. In short, doing what we can to maintain the ability of planet earth to support life.
Reed Plachta	Please limit logging of the USA's last remaining old growth forests. If we cut down those trees, everything from air quality above the canopy to earth below the deepest roots will be changed irreversibly. As a hunter and angler, I value especially the unique watersheds in their untouched splendor. The natural undergrowth provides forage and habitat for all things that should be there. Though neither of us may see these areas in our entire lifetime, please consider preserving these large tracts for future generations. With nuclear fusion energy projected to be just around the corner, such activities as large-scale logging will become a thing of the past (materials created by other means for a fraction of the cost), so hindsight will show cutting down old growth in the 21st century is a mistake.
Roger Weiss	Please save the old growth.
Sam Matos	I am opposed to the logging of the old-growth forest because it's more valuable from the standpoint of habitat conservation to keep it standing rather than exploiting it by harvesting its timber.
Scott Miller	As an Alaskan, I'm writing to oppose old-growth timber sales in Southeast Alaska. These forests should be left alone. They have an immense value as-is and these sales only serve the short-term financial interests of a few people as opposed to the health of the planet and the enrichment of everyone and everything on it. Please, leave something.
Scott Pearce	I am opposed to Old Growth destruction, harvests, Timber sales, clearing.
Shawn O'Donnell	I writing to share my opposition to old growth timber sales in the upcoming Five year plan. There are a myriad of reasons, timber sales generally are a economic loser for the general public, standing log growth hold far greater economic benefits for the citizens of Alaska and in light of the Governors rant comment about carbon capture this would seem contrary to that intent. Old growth stands are of course limited and what few remain should be preserved in light of replanting and second growth being available.
Steve-Kingsford Smith	For the public record, my family and I strongly oppose any and all old-growth logging in SE Alaska.
Sue Badilla	Please protect our old growth forests. Old growth is not a renewable resource because it takes many, many years for it to become an old growth forest. Animals/fish/avian species/flora diversity & sustainability depend on it. Old Growth forests are an important ecosystem that needs to be protected in Southeast Alaska for the good of the whole earth. Old growth should never be logged in our state. Let us not be shortsighted and protect Old Growth forests for the generations to come. Thank you for your time.
Timbi Barron	Absolutely no to logging old growth forest.
Todd Ligare	I would like to comment on the future of the Tongass national forest. It is my belief that the highest and best usage of these forests is entirely intact and with all of the trees in the ground. The United States has very little intact rainforest and they are critical for many things including the future of the planet. Please reject any logging requests in the Tongass.
Tracey Hepner	In this day and age of conserving the recourses we have and the knowledge we have that old growth does more good for our clean air, then any monetary value you could receive it is appalling that you as a governing association would consider selling Old Growth for WHAT. I oppose any and all removal of Old Growth in the State of Alaska. Who is running the ship?? In this day and age to think it makes good sense to cut down old growth, you must all be crazy. None of

	the areas in question are worth any amount of money, cut and dead on the ground verses what they give us as standing old growth trees. The value in Eco-systems, cleaning our air, tourism and climate controller is so much more valuable than the expense of making roads inward to cut these magnificent trees down.
Tresham Gregg	Old growth timber is very valuable left standing wherever it is. Southeast rain forest is a critical climate health resource as well as having immense value as a visitor recreation and viewshed area.
Victoria Kulikow	Remaining old-growth forests are the best defense against catastrophic climate change. Already, we are seeing crops that American industry depends on, like the cotton of Texas, being ruined by climate change. It's time to let go of old forestry practices. Keep old-growth forests intact, to stall climate change and its subsequent result on our croplands.
Vicki Vermillion	Please, please do not cut or sell old growth trees, anywhere. The forests are extremely valuable as they are.
Virgene Link-New	I oppose old growth logging in Southeast Alaska, including the El Capitan and Whale Pass sales. Our old growth forests store more carbon and shelter more wildlife. It is important to the health of Alaska and the Earth to retain them. Thank you.
Welling Pope	Old growth forests urgently need to be protected and preserved forever owing to their ability to protect biodiversity, to help in a big way the stability of the climate, to greatly protect against global warming, much better than immature or industrial forests, and to make possible the survival of key species of great importance surrounding them, such as whales marine fish and indigenous and native to the area peoples. Old growth timber sales of trees and forests in Southeast Alaska should and must be banned forever! Thank you very much for anything you can do to save in preservation Southeast Alaska's magnificent old growth forests forever.
Zachary Brown	Please eliminate ALL old-growth timber sales from your schedule, including the El Capitan and Whale Pass sales. It is crucial for carbon storage and for animal habitat that we stop logging old growth Tongass stands.
Jeanette McBride	This comment is in regard to your Five Year Schedule of Timber Sales. I am opposed to any more old-growth logging. There is very little old-growth timber remaining, and it will take hundreds of years for it to be replaced. We must have learned by now that short-term profit is a miserable way to make a decision regarding natural resources. Especially in light of how climate change in wreaking havoc in the daily lives of Alaskans, we should be doing everything we can to mitigate it - including leaving the enormously important old-growth timber intact. Additionally, research has shown the importance of old-growth forest to the health of deer herds, which many southeast Alaskan subsistence hunters rely on.
Ed Douville	My name is Ed Douville, I am the President/CEO of Shaan Seet Incorporated. I am an Alaska Native, born and raised on Prince of Wales Island. I'm writing to oppose the current five-year State Southeast Schedule of Timber Sales. Growing up my father and mother owned and worked on a Commercial Fishing Vessel as well as in the Timber Industry. Over the last 40 years I have personally witnessed the boom and the bust of the Timber Industry. I have seen the irreparable damage it has done to our villages and the effects that continue into today. As a Village Corporation, we have had to take a different direction for our Shareholders. Not only for financial and environmental impact reasons, but also for our community, their way of life, and their survival. As Alaska Natives, these forests hold our traditions, our heritage, and the history of our ancestors.
	Fish Streams
Chris Kent	Under the State's Forest Practice Act, streams and lakes are protected by a mere 25 feet of buffer. To add more harm to this, the harvest operator is allowed to ask for cutting within the buffer if DNR agrees. Which it does on a regular basis. Stream studies have clearly shown that even the 330-foot stream buffer the US Forest Service uses as a standard is not enough.

Larry Edwards	<p>All of the planned sales are adjacent to anadromous streams. The potential for increases in landslide frequency caused by climate change threatens fish habitat. Logging and roads exacerbate these risks. Landslides cause egg and embryo mortality by scouring redds as they move through spawning areas and then deposit sediments downstream. Increased stream scouring and sedimentation may also reduce spawning success and winter survival for some salmon species, such as coho, with potential long-term population effects. British Columbia scientists studying salmon habitat are also reviewing the combined effects of climate change and logging on salmon. Logging reduces the regulating service of forests that mitigates more severe and frequent floods, which wash away rearing habitat or suffocate salmon in the early stages of their life cycle with sediment.</p>
Linda Behnken	<p>At a minimum, ALFA requests that you consider the following other measures:</p> <ul style="list-style-type: none"> (1) Move all cutting units much further away from lakes, salmon streams and headwaters streams that drain into them in order to increase the amount of riparian vegetation and area needed to maintain cooler air temperatures and reduce fine sediment inputs; (2) Use only existing roads in order to reduce the impacts of stream crossings and new sediment sources; (3) eliminate all steep slope areas so as to reduce the risk of destroying salmon habitat through landslides; (4) recognize the socio-economic changes in the region over the last two decades and remove controversial sales near communities, such as those near Whale Pass and Naukati; (5) reduce the amount of clearcutting visible along the shoreline, whether El Capitan Pass, Woodpecker Cove and numerous other area which is disturbing not only to ALFA members who enjoy the region's scenery while fishing but also destroy a forest resource that is of considerable economic value to the tourism industry; and (6) consider using portions of the Southeast State Forest for low-impact commercial recreation similar to other Department of Natural Resources programs because it would generate more revenue over time while simultaneously protecting other valuable forest resources. <p>Because of fluctuations in salmon returns and marine and freshwater habitat qualities, fishery managers are increasingly emphasizing the need to manage salmon-producing ecosystems in a way that maintains population biodiversity. Properly functioning biological systems are analogous to well-designed financial portfolios, allocating assets in a way that achieves a balance between gain and risk. The more diversity an asset portfolio has, the more stable its overall returns, over time. For salmon, the "portfolio effect" relies on diverse populations (assets) from many watersheds to provide some stability for commercial, subsistence and sport fisheries. Habitat diversity and salmon population diversity is the portfolio effect that allows for resilience in the face of various stressors. Whether caused by logging and road construction, climate change, or both, changes in stream flow, fine sediment deposition and temperature change will ultimately affect the quantity and quality of salmon habitat, including habitat connectivity and complexity. Prince of Wales Island in particular is the most important island ecosystem in Southeast Alaska for commercial fish production, on the basis of identified sockeye habitat, numbers of stream miles for coho and pink salmon and number of Alaska Department of Fish and Game "Primary Salmon Producer" watersheds. The island's watersheds have been one of the most important parts of Southeast Alaska's salmon system and primary producers of wild salmon stocks that support salmon sport, subsistence, seine, gillnet, and troll fisheries.</p> <p>The 2023-2027 FYSTS will reduce the salmon portfolio on Prince of Wales Island and on other islands affected by this sale schedule. The Division of Forestry and Fire Protection has a public trust responsibility to maintain aquatic ecosystems that produce salmon. ALFA strongly recommends that you reduce the acreage allocated to large timber sales by enhancing riparian protections of both anadromous and non-anadromous streams, reducing road construction, and other measures necessary to protect Alaska's fisheries and fishing communities.</p>

	Helicopter Logging
Tessa Axelson	AFA questions the likelihood of doing helicopter operations as suggested in the 2023-2027 FYSTS. The current shortage of helicopter operators available to conduct work in AK, and the respective costs to timber operators makes the use of helicopters marginal at best.
	Landslides
Larry Edwards	Logging increases landslide risks by altering groundwater to surface water flow regimes and by reducing the anchoring and reinforcing effect of tree roots that is critical to maintaining soil stability in high risk areas. Intense rainfall on saturated soils – particularly during fall and winter multi-day storms – is the primary cause of landslides in southeast Alaska. Clearcutting accelerates landslide activity during heavy precipitation events. Southeast Alaska-specific studies show that logging increases the frequency of landslide occurrences, with landslide rates in logged areas typically 3 to 5 times higher than in unlogged areas. Similar studies in British Columbia’s Queen Charlotte islands and other areas in western North America have identified even higher landslide occurrence rates after logging and logging road construction.
	Wildlife
Cheryl Fecko	My other major concerns are over the negative impacts these and other proposed old growth clearcuts will have on deer, fish, and other wildlife habitat. Sitka Black-tailed Deer population declines on POW are threatening a way of life for subsistence users on the island. The loss of habitat over the decades, has left tracts of virtually useless habitat for deer and other old-growth dependent species. Now the State is stepping up the pace to harvest 100’s of acres of old growth on the island, including areas, once a part of the Tongass National Forest set aside as wildlife corridors and critical wildlife areas. At the very least the state should reanalyze those areas once federally selected and designated as being critical to wildlife, including salmon, SBTB, and other old growth dependent species, and give them State designations as protected wildlife areas, a move towards managing our state forests for multiple use.
Katie Rooks & Maranda Hamme	In the FYSTS, the DOF fails to acknowledge its role in contributing to loss of habitat from timber harvest and road building or provide any discussion of how it evaluates proposed sales for impacts on habitat values. Limited reference is made to “known resident high value and anadromous stream retention areas,” but the DOF does not elaborate on this, nor does it address the cumulative impacts of continued removal of old growth timber on state lands, in addition to that occurring on adjacent land ownerships. When offering a timber sale that is adjacent to areas harvested by other landowners, the DOF should inform the public on how these individual sales and any roads to be constructed further reduce remaining old growth habitat, eliminating winter habitat for deer or wildlife corridors for bears. Alaska Department of Fish and Game (ADF&G) literature repeatedly describes old-growth habitat and deer populations as inextricably linked through many decades of research ¹³ — it also defines old-growth as high-value deer habitat, while the DOF fails to substantively address habitat concerns in areas where they have been raised. The discrepancy between how the DOF and ADF&G and federal wildlife managers define identical old-growth habitat needs to be addressed. This point was recently raised at the Prince of Wales Island Unit 2 Deer Summit held in October 2022. ADF&G has identified serious concerns about the deer population on POW linked to stem exclusion, as dense stands of young growth replace what once was old-growth and then became clearcut openings. The science and evidence predict this impact on deer populations will worsen over the next decade. ¹⁴ The public agrees, and numerous discussions about subsistence concerns relating to deer are occurring. It is finally being recognized how big a role old-growth habitat plays, and as POW residents watch more and more fast-

	paced old growth logging by the State impact the island, they are observing that the cumulative effect of 50 years of industrial logging is now impacting the ability of subsistence users to get enough deer to feed their families.
Timbi Barron	The Queen Charlotte Goshawk is a protected species whose habitat is strictly old growth forest, they cannot live in deforested areas.
Toni Androski	Although I live far from the Tongass, my graduate research includes endemic mammals in Southeast Alaska, and I have been fortunate to travel to Wrangell and Haines for field work in 2021 and 2022. Decades of research clearly indicates that old-growth forest is essential for game species such as black-tailed deer, and that clear-cutting and logging roads are especially devastating to Southeast Alaska's already-fragile salmon populations. With the reinstatement of the roadless rule in the Tongass, this region is finally being recognized as the national resource that it is. Forest management by the NFS and Alaska DNR should work to protect the capacity of these forests to store carbon and support the wildlife and plants that are needed to sustain Alaskans' subsistence culture.
Ed Douville	<p>All twelve communities that make up Prince of Wales do not have access to large supply chain grocery stores and survive heavily off the old growth areas outlined in this sale. Many of these old growth sale areas are used for hunting, food sources, livelihood, and a way of life. The remaining old growth forests on Prince of Wales are becoming increasingly depleted and fragmented, resulting in a significant loss of habitat that is important for many species (e.g., Sitka Black Tailed Deer, Flying Squirrels, Goshawk and many others). In addition, the nature of island ecology is that species are confined and cannot travel to new habitats, risking extinction and irreversible loss of biodiversity.</p> <p>Alaska Department of Fish and Game (ADF&G) literature repeatedly describes old growth habitat and deer populations as inextricably linked through many decades of research, finding that most old growth provides high-value deer habitat. The science and evidence predict this impact on deer populations will worsen over the next decade. The public agrees, and numerous advisory council discussions about subsistence concerns relating to deer are occurring. It is finally being recognized how big a role old-growth habitat plays, and as POW residents watch more and more fast-paced old-growth logging by the State impact the island, they are observing that the cumulative effect of 50 years of industrial logging is now impacting the ability of subsistence users to get enough deer to feed their families. In addition, the State DOF fails to acknowledge its role in contributing to loss of habitat from timber harvest and road building or provide any discussion of how it evaluates proposed sales for impacts on habitat values. Despite quite a bit of Alaska Department of Fish and Game (ADF&G) concern about deer populations on Prince of Wales Island, the State intends to cut "important winter territory".</p>
Larry Edwards	<p>We have significant concerns about the impacts of logging planned under the FYSTS – in combination with past, planned or ongoing logging by other landowners – on Prince of Wales Island wildlife populations. The FYSTS needs to consider the cumulative effects of 2023-2027 planned timber sales resulting from previous logging in combination with future logging planned by Forest Service, other state entities and private landowners. The Alaska Supreme Court has identified a duty to analyze cumulative impacts under Article VIII of the Alaska Constitution. The court explained that: A bedrock principle in Article VIII of the Alaska Constitution mandates that the State’s natural resources are to be made “available for maximum use consistent with the public interest.” ... We have said that to ensure these principles are followed, it is necessary for the State to take a “hard look” at all factors material to and relevant to the public interest: this “hard look” necessarily included considering the cumulative impacts of a project.</p> <p>The cumulative, intensive clearcutting across a vast area of Prince of Wales Island transformed once productive deer habitat into dense, even-aged forests with little forage that are of no value to deer and which increase their vulnerabilities to other threats. The</p>

	<p>disproportionate 40 percent loss of large-tree forest to logging on northern Prince Wales Island contributes to half of the winter deer habitat having been lost, so far. Recent federal timber sales targeted most of the last remaining stands of high-quality winter deer habitat and deer travel corridors in the north and central parts of the island. Substantial clearcutting continues on non-federal lands. Biologists expect the island’s deer population to decline because of this habitat loss. The Alaska Department of Fish and Game explains that: We should better inform the public regarding the effects of logging on deer populations, so they are aware of trade-offs between timber harvest and wildlife. We anticipate that logging related reductions in important winter habitat will reduce deer carrying capacity for decades to come. The long term consequences of habitat loss include loss of hunting opportunity and the inability to provide for subsistence needs of rural residents. The decline in deer carrying capacity has long-term consequences in terms of reductions in deer hunting opportunity and inability to meet hunter demand and subsistence needs. Prince of Wales Island produces nearly a quarter of the statewide deer harvest and is the second most important provider of deer in the region. They support a substantial and increasing hunting effort — Prince of Wales Island residents, hunters from other Southeast Alaska communities and nonresident hunters harvest as many as 3,600 deer each year. There is increasing concern about ongoing declines in POW deer populations. The increased hunting pressure concerns subsistence hunters who are having increasing difficulty harvesting deer on the island. The Division should downscale the FYSTS in order to not worsen conditions for deer. The Division’s 2020 Forest Action Plan recognizes that ecosystem services provided by Alaska’s forests include provisioning services, such as wild foods which have both cultural and economic value. Many rural communities depend on the forest foods – over three-fourths of Southeast Alaska households in rural communities rely on wild game for example.</p> <p>Impacts to other mammals are also a concern – several of the planned clearcuts overlap with known denning habitat for wolves and bears in the Southeast State Forest. The island’s landscape has become more challenging for wolves which prefer low-elevation, old-growth forest with high quality deer habitat, and avoid logged forests. Like deer, they use young clearcuts briefly but avoid older clearcuts. Multiple studies show how increased road densities, which are very high across the landscape, correlate to increased wolf mortality risks.</p> <p>For black bears, logging is also the most serious long-term habitat threat. Logging and timber road construction reduce old-growth forest habitat, denning habitat, foraging habitat and increasing disturbances during summer and vulnerability to human harvest. Bears, in similarity to wolves, are susceptible to hunting and, like deer, experience significant “succession debt.” This succession debt is the irrevocable commitment – caused by logging – to a protracted habitat response that ends in a long-term loss of foraging capacity as clearcuts regenerate into wholly unsuitable habitat (called stem exclusion). Bears utilize some of the same food resources as wolves, such as deer and salmon which both fluctuate and are at risk to the combined effects of logging and climate change. Black bears in southeast Alaska rely on trees with large diameter boles for denning habitat, and select for specific habitat types that provide specific ecological features, particularly protection from maritime windstorms. Coastal black bears rely in particular on large diameter trees or structures derived from those trees –features generally not provided in the large expanses of second growth forest. Large scale removals of older forest reduce the supply of denning places for black bears. Thus a major concern is not just opportunity to re-use of existing den sites – but also redundancy of the supply, through availability of alternative denning habitat. Defenders requests that you downscale the FYSTS to avoid further cumulative damage to wildlife habitat and ultimately to wildlife populations and the reliance of local communities upon them.</p>
Alexander Riordan	<p>I’m an avid hunter and outdoorsmen. I live in SE Alaska and regularly spend time on POW. It has been shown time and time again that old growth logging is detrimental to the fish and game species that make this place an outdoor paradise. Please stop putting your profit above the land that we who live here love so much. Please stop old growth logging.</p>

Connie LaPerriere	I have seen how the wildlife uses these areas and how so much in the area has been cut, causing problems for the wildlife. Clear cuts are not good for wildlife. I have also been through different clear cuts after about five years, and they are devoid of most wildlife. I would include Whale pass, Naukati, and Control Lake in these comments.
Patrick Comer	Decades ago, safeguards to protect old-growth timber were instituted for the Tongass. Now, politicians want to open it up to clearcut logging and road building. Thirty-five communities make up Southeast Alaska. They are Alaska Natives, commercial fishermen, hikers and kayakers, small business owners, hunters, parents, grandparents, and youth. These are the homelands of our Alaskan Tlingit, Haida, and Tsimshian families. Southeast Alaska is not just pretty scenery, it is where Alaskans live, work, and play. They rely on this living forest and its waterways for food, jobs, clean air, and water. Halt all new timber sales and mining, and stop ignoring environmental regulations while trying to extract more and more minerals from our salmon-producing watersheds. Rescind the Five Year Schedule of Timber Sales (2023-2027) for Southeast Alaska. On the front line of change, Alaskans must do everything they can to seriously slow the rapid climate warming that we are experiencing.
Michael Kampnich	<p>I request that the Board of Forestry withdraw the Five-Year Schedule of Timber Sales due to its inadequate consideration of the impacts this sale will have on the people of Southern SE Alaska, on private property values in Whale Pass and other communities, on the increased likelihood of landslides upon roads on Prince of Wales Island, on the environmental and on Old Growth Forest habitat that is vital for deer survival in winter and early spring time.</p> <p>There appears to be little consideration of the impact these sales will have on deer and their need for OG winter habitat. Prince of Wales Island has seen a significant decline in harvest opportunities for deer over the last 6+ years. The deer population here is clearly in decline and a significant reason for this is loss of OG winter habitat.</p> <p>As stem exclusion in the YG forests continues to expand throughout POW, the impacts to the deer population on POW increase. One acre of OG forest today is exponentially more important than it was 40 or 50 years ago.</p> <p>It will be several generations before we will begin to see our forests return to a state that is capable of supporting a healthy deer population. We simply can not afford to lose more OG forest habitat.</p> <p>The decline in our deer population, as a result of loss of habitat, was predicted by wildlife biologists decades ago. The suggestion that habitat would cause a significant decline in our deer population was not taken seriously by most, including myself.</p>
FYSTS Planning, Sustained Yield, AAC, Cumulative Impacts	
Aaron Brackel	<p>The sustained yield principle of the Alaska Constitution should be applied across all renewable resources and Alaska-owned forests should not be managed solely for sustained yield of timber. The existing annual ecosystem services and habitat production returns of forest lands should be weighed in evaluating sustained yield addition to the one-time returns of timber harvest. These annual returns are a naturally occurring renewable resource from the intact forest and are particularly important in areas where nearby forest has already been cut and the habitat on those lands has lost its old-growth habitat value. Where nearby forest has canopy that is closing, the annual ecosystem production value of adjacent Alaska-owned forest land is already higher and that needs to be taken into account. Please see the approach to valuing existing habitat in the SeaBank 2019, 2020, and 2022 reports. The current practice of identifying the merchantable timber as the sole "renewable resource" from Alaska-owned forest lands is contrary to the Alaska Constitution and needs to be reevaluated. The sustained yield of existing old-growth forest is of higher long-term value to the people of the state and preserving it in old-growth condition best provides for the people of Alaska - particularly in areas where nearby old-growth habitat has been destroyed by clear cut logging. Sitka blacktail deer are a renewable resource from the land that is particularly vulnerable to habitat fragmentation and impacts from old-growth logging.</p> <p>The annual allowable cut analysis in the Southern Southeast Area Operational Forest Inventory And Annual Allowable Cut</p>

	<p>Analysis for State Forest and General Use Lands (July 17, 2020) is based on a timber-only approach and should be revisited and changed. See, "The area regulation method involves determining the net-forested acres available for harvest and dividing that number by the rotation period.", p.10. The State of Alaska needs to take a hard look at what actual "renewable resource" returns are instead of artificially creating a timber only analysis. A timber-only analysis of "renewable resources" from old-growth is not consistent with the public interest and does not allow for a clear-eyed analysis of the other existing annual returns from the habitat that exists in old-growth condition. See the SeaBank annual reports for further information on existing annual returns from old-growth forests. Site-specific analysis is critical and needs to take into consideration existing nearby habitat impacts from prior old-growth logging (whether on State, federal, or private lands) in order to best understand the contextual value of unlogged forest in any given location. The Alaska Forest Resources and Practices Act at Sec. 41.17.060 (b)(1) provides support for this approach: (1) forest land shall be administered for the multiple use of the renewable and nonrenewable resources and for the sustained yield of the renewable resources of the land in the manner that best provides for the present needs and preserves the future options of the people of the state.</p>
Bill McLaughlin	<p>I am a frequent visitor to Alaska's Southeast. I believe logging old growth forests violates your stated policy: "The Division manages forests for multiple uses and the sustained yield of renewable resources on 20 million acres of State land." An old growth forest is not a 'renewable resource' by any measure. It is beyond your skill to 'manage' and beyond our combined reckoning to determine its crucial importance in the coming heating of the planet. As the climate crisis creeps ever nearer and our options to forestall it shrink daily, it is imperative to leave these old growth forests standing and intact.</p>
Bruce Connery	<p>The Alaska Constitution states the management of the state's renewable resources are to be used and managed in a way that keeps them in sustainable yield in concert with multiple use and in doing so will include the cumulative impacts of previous activities.</p>
Christine Kleine	<p>The 2023-2027 FYSTS document states several times "Under no condition will the annual allowable cut be exceeded as averaged over a ten-year period". Certainly. The FYSTS should also include a statement that it is DOF intent to meet its Mission and prior commitments to actively pursue offering the maximum volume allowed under the laws and regulations on an annual basis. My concern is that there is insufficient volume in the 2023-2027 FYSTS to meet DNR's commitment document "Strategy for Southeast Alaska Bridge Timber Supply" dated August 18, 2021. That strategy is to supply the industry with 70 mmbf at a rate of 14 mmbf annually over 5 years. The document five-year period is FY2022 through FY2026; however, the proposed 2023-2027 FYSTS indicates only 50 mmbf over the same period. This is very concerning to me because timber sales proposed in the 2021-2025 FYSTS and 2023-2027 FYSTS indicate significant volume losses between the two documents—volume losses averaging around 45%. As a solution to this problem and meet the DNR DOF commitments, I suggest that the 2023-2027 FYSTS simply be adjusted to show 81 mmbf available over the 1st four years of the five-year schedule. It would provide DOF the ability and the adequate volume to offer the Bridge Program allowed volume with the 45% fall-down from the estimated available volume to actual volume.</p>
Helen Unruh	<p>I moved to Alaska in 1982....since then the timber industry has shrunk.... most of the mills have closed, loggers have found other type work or moved. There is now an opportunity to protect the assets we have in Old Growth Trees and be creative in planning and implementing ways to have a sustainable forestry business. Once the Old Growth Trees are cut they can never be replaced. There are areas that were logged 50-100 years ago that probably have trees large enough to cut. Why can't we manage the remaining forest so as to save the old historic trees and grow/cut the younger trees???? Who profits from cutting the Old Growth Trees? Certainly not Alaska or the USA.... as most logging is subsidized.... roads are built etc etc.... so only a few people make</p>

	<p>money while the rest of us pay. Seems like a losing proposition monetarily and environmentally except for a few greedy manipulators. Please, save the Old Growth Forests for future generations to enjoy, for the wildlife habitat they provide, and for the Carbon Dioxide they store. Trees like these will NEVER be seen again. Once gone.... that's it! Be creative and make a plan to care for the forest we have and when loggingto figure out a way that is sustainable.</p>
Katie Rooks & Maranda Hamme	<p>SEACC opposes the proposed timber sales of old-growth forest on Prince of Wales. Due to continued logging and road building on multiple ownerships, including U.S. Forest Service land, Alaska Native corporation land, University land, and Mental Health Trust land, remaining old growth forests on Prince of Wales are becoming increasingly depleted and fragmented, resulting in a significant loss of habitat that is important for many species. Old-growth forests provide essential habitat for deer, bears, wolves, martens, flying squirrels, and goshawk, among others, as part of a complex ecosystem that also supports thriving watersheds for salmon habitat. The nature of island ecology is that species are confined and cannot travel to new habitats, risking extirpation, and irreversible loss of biodiversity. Alaska Constitutional mandates for management of the state's renewable resources dictate that these resources must be used in a way that keeps them sustainable.⁶ State Forest land must be managed under the principles of multiple use and sustained yield.⁷ The state is required to take a "hard look" at cumulative impacts by the Supreme Court: A bedrock principle in Article VIII of the Alaska Constitution mandates that the State's natural resources are to be made "available for maximum use consistent with the public interest." ... We have said that to ensure these principles are followed, it is necessary for the State to take a "hard look" at all factors material to and relevant to the public interest: this "hard look" necessarily included considering the cumulative impacts of a project.⁸</p> <p>The Ninth Circuit Court has explained the significance of cumulative impacts:</p> <p>Cumulative impacts of multiple projects can be significant in different ways. The most obvious way is that the greater total magnitude of the environmental effects – such as the number of acres affected or the total amount of sediment to be added to streams within a watershed may demonstrate by itself that the environmental impact may be significant. Sometimes the total impact from a set of actions may be greater than the sum of the parts. For example, the addition of a small amount of sediment to a creek may have only a limited impact on salmon survival, or perhaps no impact at all. But the addition of a small amount here, a small amount here, and still more at another point could add up to something with a much greater impact, until there comes a point where even a marginal increase will mean that no salmon will survive.⁹</p> <p>The DOF has an obligation as a forest lands manager to manage its land for all its values in a way that recognizes that the trees are just one component of a highly interdependent ecosystem. For the harvests proposed, the DOF should take a "hard look" at the effect of their plans on deer populations and subsistence users, as explained by Alaska Fish and Game.</p> <p>Prince of Wales Island has the highest amount of total productive forest in Southeast Alaska (USDA 2016). However, POW received the most substantial logging activity in the region since 1954, which resulted in a 94% reduction of contiguous high-volume forest (Albert and Schoen 2013). This logging activity has reduced deer habitat in north central POW by 46% and in south POW by 18% (USDA 2016)...Commercial logging has greatly altered forested habitat and human access in Unit 2, ADF&G estimates about 475 mi² (1,230 km²) of forested deer habitat has been logged over the past 50 years, including over 40% of the old growth forest once found in Unit 2. Logging [and] associated road building in Unit 2 has created the highest density of roads in Southeast Alaska, with approximately 4,000 km (2,500 miles) of drivable roads on national forest land and native corporation lands...As clearcut logging continues to reduce old-growth habitat in Unit 2, deer populations are expected to decline.¹⁰ From a forest management standpoint, it is irresponsible for the DOF to fail to consider the impacts of continued removal of remaining high-volume old-growth stands on state land within the larger context of harvests that are occurring on adjacent land ownerships. Subsistence users have expressed concern about the adverse impacts of continued old-growth logging on the deer population for</p>

	years.
Katie Rooks & Maranda Hamme	<p>Another problem with the FYSTS document, in that the DOF states:</p> <p>“At present, and due to a variety of reasons, including budget constraints, lack of personnel, sale program direction and market uncertainties, most of the sales in the last three years of this schedule are conceptual in nature unless otherwise noted. Conceptual timber harvests planned through aerial photo/satellite image interpretation will be refined based on field reconnaissance. Field work to refine and develop the proposed timber sales will commence as staffing levels, other workload responsibilities, and budgets allow”. This statement poses serious questions about the DOF’s capacity to manage state forest land with due consideration. If the majority of the sales delineated in this document are uncertain, and the DOF does not currently have the budget or staff to allow for complete field study, when will the opportunity be made for the public to consider and comment on these specific sales, after the inclusion of further details which are important for the public to have when making comments? The DOF should disclose when it plans to release additional details about these sales and should provide the public with an opportunity to comment on the sales at that point.</p>
Les Cronk	<p>The DOF states several times in the 2023-2027 FYSTS that, "Under no condition will the annual allowable cut be exceeded as averaged over a ten-year period". We do not support or request that the DOF violate any State statute when offering State timber resources for sale but we do request that the DOF includes a statement within the FYSTS stating their intention to actively pursue the offering of the maximum amount of volume allowed under existing laws and regulations on an annual basis. There is insufficient volume included in the 2023-2027 FYSTS to fulfill the commitment of the DOF's Briefing Paper titled "Strategy for Southeast Alaska Bridge Timber Supply" dated August 18, 2021. That strategy is to supply industry with 70 mmbf at a rate of 14 mmbf annually for 5 years. By the Briefing Paper's date and content, the five -year period runs from FY2022 through FY2026. The 2023-2027 FYSTS only shows 50 mmbf during that timeframe. This is very concerning especially when considering that many of the proposed timber sales listed in both the 2021-2025 FYSTS and the 2023-2027 FYSTS show significant losses in volume between the two documents. The losses in volume average approximately 45%. We strongly suggest that the 2023-2027 FYSTS be adjusted to show approximately 81 mmbf available for the first four years of the five-year schedule. That amount of volume should provide the DOF with the ability to offer the Bridge Timber Program volume with a 45% fall down from estimated available volume to actual volume.</p> <p>Additionally, we would request that the DOF consider offering all available volume at remote locations at one time, including the ones listed in the 2023-2027 FYSTS, Heceta, Earl West, Suemez and Woodpecker Cove. Without a broader grouping of these sales, it is highly unlikely that the individual sales, at such small volumes, would be economically viable for operators to purchase.</p>
Tessa Axelson	<p>Sustained Yield</p> <p>Within the FYSTS, the Division of Forestry (DOF) refers to the definition of Sustained Yield from AS 38.04.910 which is for all resources on State lands. Since the DOF is the responsible agency for all State-owned timber resources; AFA believes that the DOF should use the definition of sustained yield from The Alaska Forest Resources & Practices Act (AS 41.17), found at AS 41.17.950(26). The definition states that "sustained yield" means the achievement and maintenance in perpetuity of a high level of annual or regular periodic output of the various renewable resources of forest land ... "but does not require that timber be harvested in a non-declining yield basis over a rotation period" (emphasis added).</p> <p>Timber Sale Process</p> <p>The AFA appreciates the use by DOF in southeast Alaska of the multiple statutes for timber sales including AS 38.05.115, AS 38.05.118, AS 38.05.120 and occasionally AS 38.05.123. AFA also appreciates the fact that in southeast Alaska DOF uses variable</p>

time lengths when it offers timber for sale. However, AFA is concerned that the DOF Briefing Paper 2022-24 "Young's Timber, Inc. and negotiated timber sales" will become the standard across the State. That briefing Paper stated that AS 38.05.120 would be used to prevent giving "an unfair advantage to one purchaser" when offering timber for sale. Our concern is that if AS 38.05.120 becomes the only statute that DOF uses to offer sales across Alaska that it would provide "an unfair advantage to one purchaser" in southeast Alaska.

Timber Sale Land Base

The DOF has taken an extremely conservative approach in developing the inventory of timbered lands to include within the timber sale land base for southern southeast. Numerous acres within the Southeast State Forest that are available for timber harvest according to the Forest's management plan have been removed from the timber sale land base. The Southeast State Forest Plan does not require providing a 300-foot-wide coastal buffer, nor does it require a buffer adjacent to lands classified for subdivisions. Neither does the Plan prevent the DOF from establishing such buffers, however doing so seems to conflict with the primary purpose of a State Forest per AS 41.17.200 which is timber management that provides for the production, utilization, and replenishment of timber resources.

Some of the acres mentioned above as well as other acres have been set aside based upon due deference to the AK Department of Fish and Game. These set asides, particularly those for wildlife purposes, seem unnecessary when looking at the management intents of adjacent landownership. Currently the DOF has generated an allowable cut based on 33,216 acres of approximately 74,555 acres available for timber harvest. These State acres are surrounded by more than 9.2 million acres of the Tongass National Forest (Tongass). The majority of these lands are not available for timber harvest and the majority of the lands available for harvest being stands of young growth timber. The Tongass has an extremely vibrant wildlife conservation strategy. It is incomprehensible that State lands which equal less than one percent of southern southeast need to be set aside for wildlife purposes. Those lands do have value when included as part of the available timber land base when considering the economic well-being of the communities of southern southeast Alaska which are dependent upon resource development.

Five Year Schedule Activities

AFA appreciates the staff efforts in developing the Five-Year Schedule. The maps and written details are helpful when reviewing the document. Hopefully in the future the rest of the DOF will adhere to the effort and methods that the DOF staff in SE has put the existing and preliminary Five Year Schedule. Details, especially in maps, are lacking throughout the rest of the State. Several times within the 2023-2027 FYSTS, the DOF states that, "Under no condition will the annual allowable cut be exceeded as averaged over a ten year period". At no time does AFA support or request that the DOF violate any State statute when offering State timber resources for sale. AFA does requests that the DOF includes a statement within the FYSTS that DOF intends to and will actively pursue the offering of the maximum amount of volume allowed under existing statute in southern southeast on an annual basis. There is insufficient volume included in the 2023-2027 Five Year Schedule of Timber Sales to fulfill the commitment of the Briefing Paper titled "Strategy for Southeast Alaska Bridge Timber Supply" dated August 18, 2021. That strategy is to supply industry with 70 mmbf at a rate of 14 mmbf annually for 5 years. By the Briefing Paper's date and content, the five year period runs from FY2022 thru FY2026. The 2023-2027 FYSTS only shows 50 mmbf during that timeframe. This is very concerning especially when considering that several of the proposed timber sales listed in both the 2021-2025 FYSTS and the 2023-2027 FYSTS have lost significant volume: El Capitan volume is down by 20%, Earl West Area dropped by 76%, and Suemez declined by almost 50%. It is understood that these volumes are best estimates based on limited fieldwork. However, there is almost a 30% drop in volume for the Whale Pass Timber Sale between the two FYSTS. AFA assumes the volume in the 2023-2027 FYSTS is based on the actual layout of units for that sale. AFA strongly suggest that the 2023-2027 FYST be adjusted to show approximately 81 mmbf

	available for the first four years of the five year schedule. That amount of volume should provide the DOF with the ability to offer the Bridge Timber Program volume with a 45% falldown from estimated available volume to actual volume. The 45% falldown is based on the difference between volumes in the 4 sales listed above.
Ed Douville	Reviewing these Proposed Timber Sales, I would also like to point out that the State of Alaska hasn't included very much detail surrounding some of these sales. The schedule does not provide enough specifics on volumes that are specifically anticipated for locally processing and value-added products which keep small local mills operating and provide jobs in Southeast communities. We would like to encourage the State to transition toward locally sourced timber and wood products much like the Forest Service has started to do and move away from foreign transport.
Larry Edwards	<p>Defenders submits that the Division of Forestry should remove General Use lands from its timber acreage as part of the agency's responsibilities as trustee of public trust resources and statutory sustained yield and multiple use mandates. The FYST timber sale program includes two land classifications: SESF lands and General Use (GU) lands designated as appropriate for timber harvest. The Area Plans that authorize timber sales in these areas are outdated and precede significant regional changes in resource values to the local economy, resource abundance and other socioeconomic changes. It is unacceptable to rely on outdated land classifications.</p> <p>Also, the Division's planning processes need to recognize Constitutional requirements to provide for the sustained yield of fish and wildlife. For example, the Division must explicitly provide for the sustained yield of predators such as wolves and bears. The sustained yield principle requires "conscious application insofar as practicable of principles of management intended to sustain the yield of the resource being managed." Although Alaska's Supreme Court has not imposed stringent requirements on state resource managers such as numerical requirements for wildlife populations, the Constitution requires, at minimum, some effort to apply specific sustained yield principles relevant to the management regime, such as minimum population objectives, procedures for tracking wildlife populations, and provisions to address habitat loss when minimum objectives are not met. The FYSTS must demonstrate the necessary "conscious application" of sustained yield principles relevant to wildlife – reconnaissance of most sale areas is incomplete, dens and raptor nests (other than eagles) are not buffered, there is no consideration of fish and wildlife habitat conditions or population trends in the broader landscape, and there are no provisions to sustain populations that exist at low levels. We request that the Division of Forestry prepare a substantially downscaled FYSTS to accommodate sustained yield principles for other resources. Alaska's sustained yield provision is not a mandate to maximize yield, but rather instead explicitly factors in multiple use considerations that require additional consideration of the output "of the various renewable resources of forest land and water" and "without significant impairment of the productivity of the land and water." The FYSTS must "contain sufficient information to provide the public and forest products industry with a basis to comment on proposed sale offerings." There is a need to provide information about how planned sales interrelate with other, more economically valuable forest resources.</p>
	Public Recreation
Cheryl Fecko	Another major concern includes the competing and conflicting interests between timber production and recreation for island residents and visitors on Prince of Wales Island. I give one example at the north end of the island where the USFS has plans to enhance and expand recreational opportunities near the El Capitan cave area, including a new trail to the cave and a cabin. Many people, myself included, have used the old LTF site for camping. It's a great spot. Now I see that it will once again become a functioning LTF adjacent to a very popular recreational area. It seems like a conflicting, if not hazardous use to me.
Don Surgeon	I have lived in Alaska for over 40 years, mostly in Sitka. After large-scale logging began with the development of the pulp mills, we were repeatedly assured over the years that old growth timber would not be needed anymore because it would be replaced by

	new growth ready to be harvested in 50 years. Despite the passage of that 50 years period, the logging industry and the state continue to focus on old-growth forests to meet their timber needs. It's time to leave old growth forests alone and meet any timber needs by harvesting only second growth
Maranda Hamme & Dain Myers	Many of the old growth sales outlined in this schedule, such as El Capitan and Whale Pass are some of our best recreation spots and areas for additional opportunity for Prince of Wales. I took my niece to El Capitan Cave for her first time this past summer and was told that the FS will be expanding the El Capt area to have cabins along with additional tours.
Larry Edwards	Clearcutting and logging activities degrade the quality of the forest recreation experience for both residents and visitors, reducing the value of this ecosystem service. Forest visitors and recreators prefer diverse, mature forests that are in their natural state and exhibit little trace of human activity. They generally avoid the areas visual disturbed by industrial logging (such as logging trucks, bare ground or fallen trees).
	Tourism
John Torrey	I am opposed to sale of timber acreage of any locations with Old Growth trees because I both enjoy hiking through them and their carbon sequestration value. There is also tourism dollars, larger value for local economies than what is gained by local citizens working as tree fallers, etc. and especially since little to no milling is done in Alaska, that would probably be restrained without those trees. I had lived in Alaska for sixteen years, worked in a small mill for two until it closed. I know that very, very few Alaskans benefit from tree harvests at this point. I enjoy seeing the big, old trees as do tourists. I believe the science that carbon sequestration is a valid concept and one that is affected even more by larger trees with bigger canopies.
Paul Davis	Clearcutting degrades the recreation experience for tourists and residents, lessening the marketability of Southeast Alaska as an adventure-travel destination. Timber industry activities can displace visitors from large areas for decades because they change the non-industrial character of the landscape, displace wildlife and harm their habitat, reducing the value of SeaBank cultural services as an adventure destination.
Brenda Hattery	When I heard that old-growth timber sales are planned around the region, including the El Capitan and Whale Pass sales, I felt I had to comment on this awful action. Take heart, Alaska, and do what is right for the health of Alaska's tourism, fishing, and hunting industries. The old-growth forests of Southeast Alaska have extreme value to the state for the ecosystem they provide enhancing the fisheries, and the game. They also provide amazing backdrops to outdoor activities that increase tourism to the region and support a multitude of local businesses. Not to mention that "old growth" deserves to remain in forests for additional hundreds of years. Let the pulp paper be made from farmed trees and the building lumber the same. Stop allowing the export of Alaska's precious timber to other than American markets. And seriously, stop with the clear cutting of sections and any cutting of old growth. The clearcutting of forests is a detriment to tourism. The cutting of old grow timber in particular for no reason other than greed for the piddly pennies it brings in the market, is an unnecessary waste of an amazing asset worth far more that the small immediate income from the harvested wood. This old growth harvesting is the act of short-sighted politicians and businessmen who only care about their near-term returns selfishly and the near-term year's personal outcomes for a few people. These are not sufficient reasons to hurt the entire SouthEast Alaska Tourism industry and ecosystem for the fisheries and game. Shame on Alaska for even seriously considering it. I speak from the perspective of someone who enjoys lengthy visits of Southeast Alaska with my sailboat up from Puget Sound. Please don't take away all that is special about SE AK forests. Please stop the extensive logging.
Larry	Alaska Rainforest Defenders' members use Southeast Alaska's forests for recreation, commercial fisheries, subsistence, wildlife

Edwards	<p>viewing, scientific research and other activities. We have a long-standing interest in the ecological integrity of the Alexander Archipelago and its importance to local and regional economies, both cash and subsistence. Clearcutting has destroyed much of the best remaining publicly owned winter deer habitat throughout central and southern southeast Alaska. There have long been concerns for Sitka black-tailed deer populations on many islands affected by this FYSTS and emerging concerns for them on Prince of Wales Island. Southeast Alaska residents and numerous non-resident businesses rely on the region's natural capital contained within coastal forest island ecosystems. Industrial activities associated with the removal of remaining old-growth forest and implementation of plantation forestry for recovering second-growth forests will also render the southeast Alaska island shorelines and interior areas undesirable or even inhospitable for residents and visitors to the region who come for recreation – particularly sport fishing and hunting.</p> <p>Nature-based tourism (wildlife viewing, hiking, kayaking, fishing and hunting) generates substantial revenues in the region's tourism industry. Scenery –particularly more natural appearing forest scenery in coastal settings – is a major driver of destination choices. The scenic environment also has high local value for resident recreation, and other amenity values that extend well beyond revenues from tourism. Whether using the forest for subsistence, sport fishing, hunting or recreation, Southeast Alaskans have long held a deep commitment to protecting the forest for its scenic value.</p> <p>Defenders requests that you downscale the FYSTS, with particular emphasis on reducing the amount of clearcutting near communities, along scenic byways and other areas with present or potential future recreation values, such as riparian areas used for local subsistence or guided sport fishing.</p>
Ed Douville	The 2022 SeaBank Annual Report features an entire chapter about logging threats to recreation and tourism. Clearcutting degrades the recreation experience for tourists and residents, lessening the "marketability of Southeast Alaska as an adventure-travel destination." The Report goes on to state "timber industry activities can displace visitors from large areas for decades because they change the non-industrial character of the landscape, displace wildlife and harm their habitat, reducing the value of SeaBank cultural services as an adventure destination."
	Subsidized Logging
Toni Androski	With the economy of Southeast shifting rapidly towards tourism and climate change threatening Alaskans' culture of enjoying the land's bounty, it's time to rethink the costs and benefits of logging practices, and all evidence indicates that clearcut logging must stop. A thirty-year-plus phase-out will not save these forests. If there was any economic argument to be made, I would be sympathetic to that. But the bill for logging in Southeast is footed by taxpayers. Tax dollars should not subsidize logging practices that are destroying Southeast Alaska's future.
Tresham Gregg	Logging seems to cost taxpayers more than the monetary value it creates when it is logged. Isn't it time to become stewards of the forest rather than their architects of demise?
	Jobs
Bruce Connery	In the proposal the identification of harvest to include small mills and smaller sales is positive, although more specifics on volumes to help or support local processing and value-added products should be revealed as these will continue to provide jobs in Southeast communities.
Chris Kent	Anyone observing the activities on old growth harvesting will notice that most if not all employees are not residents of the state. Old Growth harvesting does support local hire other than the mills that may buy the timber. Most value in old growth is in round

	logs and therefore most of Southeast timber stocks have been sold to outside interests.
Tanya	Wow. Read the room. Read the science. We need to keep those old growth forests. People need different jobs than the ones you are sacrificing these forests for. They will still be out of jobs once you are done with those trees. Those trees are much more valuable to your citizens as intact forest. Be on the right side of history.
	Round Log Export
Katie Rooks & Maranda Hamme	<p>In this FYSTS, more discussion is devoted to small mills and smaller sales, which SEACC sees as positive. The schedule should provide more specifics on volumes that are specifically anticipated for local processing and value-added products which keep small local mills operating and provide jobs in Southeast communities, as well as what percentage of timber harvested from the Southeast State Forest is destined for export. This could be based on the prior five years. This information would provide the public with more transparency about timber market dynamics and the role of the SESF in the local and export markets. The Division of Forestry & Fire Protection (DOF) continues to target red cedar and old-growth spruce, neither of which fit the 100-year cycle, much less a purported 65 to 80 year cycle, as cited in the Timber Methodology section. In terms of encouraging economic diversification in Alaska (a stated goal of this Governor’s administration), what methods are being considered by the DOF to increase and encourage local and regional young-growth market development, as well as ways for small mill owners to compete in those markets? Any ways that Southeast Alaska can increase its local and regional economic potential and get away from exporting round-log timber internationally should be considered. The Forest Service has accomplished several important items which will help speed the transition away from foreign export, toward locally sourced timber and wood products. The State could maximize the opportunities for all landowners by working with the Forest Service on these goals, instead of demanding that the Forest Service recreate an industry based on a historical image that doesn’t exist today; the volume doesn’t exist, the accessibility doesn’t exist, the science increasingly paints a dire picture of climate change which can be mitigated by our forests, and overwhelmingly, the ideas and desires of Alaska’s residents regarding forest management have also changed.</p> <p>Claims made by the DOF that it is responsive to stakeholder interests seem, at best, hollow. During the recent Board of Forestry meeting (February 16, 2023, via Zoom) State forestry staff recounted the “hundreds” of public comments they were receiving and stated that overwhelmingly, the comments were in opposition to timber sales.¹⁵ The State foresters described responding to these comments in frustrated tones as “time-consuming,” but did not discuss the public response in terms of influencing the decision process. The DOF has, in fact, made every effort to offer less public consultation and less public involvement, as evidenced by the introduction of House Bill 98 last year, which would have eliminated one of the public’s two chances at formally appealing a state timber sale. Last year, residents of Whale Pass vigorously and publicly opposed the proposed old-growth sale in their town, seen here again in the FYSTS. The concerned public suggested several mitigation strategies; none appear to have been considered or accepted by the DOF. No changes in the timber sale have been made so far, based on their concerns. Many are residents with homes immediately adjacent to the proposed sale. Prince of Wales is no longer exclusively an industrial resource extraction zone. Residential communities like Naukati, Coffman Cove, and Whale Pass are growing in population. Logging trucks, clearcuts, and road building impact the way of life for these residents. SEACC receives calls and emails on an increasing basis from community residents who are deeply upset with the level of truck traffic, the loss of wildlife habitat, the declines in deer population, and the distress over clearcuts which impact viewsheds and property values. As an agency charged with managing our state lands in the public’s interest, DOF and the Division of Mining Land and Water (DMLW) cannot continue to administer lands for timber on Prince of Wales without efforts to meaningfully address public concerns.</p>
Michael	The number of YG timber acres scheduled to be harvested indicate that this timber will be exported as round logs. The State of

Kampnich	<p>Alaska should not be engaged in the export of YG round logs. Rather, the State should be working to develop a fully integrated YG industry that will provide a full suite of lumber products for regional markets, by-products that can be utilized as biomass and employment for residents of SE Alaska.</p> <p>Initiating an integrated YG industry in SE Alaska will not be quick or easy. If it was someone would already be doing it. The future of the timber industry is going to be based on YG timber and it is critical that the State develop a long-term plan to provide for local needs and retain the economic value of the product here. We do not need to duplicate an outdated model of the pulp mill era that was based on harvest of a large volume of timber that produced a relatively low value product.</p> <p>Prior to a Five Year Schedule of Timber Sales being adopted, that BOF and the Dept of NR should engage in an outreach effort, throughout Southern SE Alaska, to determine what the residents of the region want and will support.</p>
Timbi Barron	<p>The logging I've seen take place in southeast Alaska is total destruction, clear cutting, wasted smaller trees, impassable areas for humans and wildlife, very little economic benefit to loss ratio, logs are shipped in the round to Asia with no real local milling occurring, logging trucks on the only roads available to residents. They ship logs in the round overseas, usually Japan, rather than even milling them.</p>
Larry Edwards	<p>Southeast State Forest Management Plan goal C, seeks to “contribute to Alaska’s economy by providing raw material for a viable and stable timber industry” and “use the limited supply of state timber to provide job opportunities in Southeast Alaska.” The Alaska Division of Forestry’s own website has indicated that raw log exports significantly reduce local employment – a position that recognizes that transportation and logging workers are less likely to be residents than sawmill workers. The only likely purchaser for these four large sales is Alcan Timber, which ships timber from state timber sales to round log markets in the lower 48 and to overseas markets. These sales will not meet the agency’s stated management intent of providing raw material for the local wood product businesses. Defenders requests that you review the Division’s 2020 Forest Action Plan goals for sustainable recreation and community health, and remove these large sales from the FYSTS.</p>
<u>Karst Geology</u>	
Aaron Brackel	<p>Karst resources should be provided extra protection and hydrology.</p>
Connie LaPerriere	<p>I am opposed to any large-scale logging of old growth on Prince of Wales Island. That island has had enough logging of old growth. In the El Capitan area, there is an amazing ecosystem of Karst and caves. This area has had enough logging. It is on Karst systems that logging is especially harmful. I know of places that have been logged in the El Capitan area that Forest Service Soil Scientists say will take an ice age to regenerate. This karst contains areas of very fragile soil that if disturbed, will not regenerate easily. The soil often goes subsurface. This in turn can cause a change in the hydrology of the area with streams that are currently underground starting to run on the surface. This could be devastating for the salmon that depend on the streams. Karst streams are often more productive for salmon because the limestone changes the PH of the streams. The underground systems also cause lower highs and higher lows because of the changes to how water moves through the systems. This also makes those streams a better habitat for salmon. In the past I have walked over many areas of the Karst near El Capitan and have seen firsthand the problems caused by logging. I also have enjoyed the areas that have been left as old growth.</p> <p>I have also been on Heceta, and Kosiushko. Some of the Karst systems on Heceta are huge and may go from altitude to sea level, and have some of the most developed and large cave systems I have encountered. I have seen roads swallowed by underlaying karst systems. I have seen wolves run on roads rather than run into clearcuts that are impossible for wildlife to use.</p> <p>Kosiushko has Karst that is not as developed, logging on those systems causes regeneration to be slower than systems that are not</p>

	Karst. The systems are smaller but the regeneration is still not sustainable
Katie Rooks & Maranda Hamme	Considerable portions of the proposed El Capitan sale area and Kosciusko Island have high value karst resources that receive special protections on National Forest System land. There should be no difference on non-NFS land. The narratives provided by DOF for these specific sales should acknowledge the karst resources present; this is basic, site-specific information that the public should have. If this information is detailed in another agency document, this is not explained. Since this is the opportunity for the public to provide comments on these proposed sales, the information about karst resources, as well as other forest features such as watersheds and habitat, should be presented.