

Southern Southeast FYSTS 2025-2029 Comments

May 2024

Department of Natural Resources, Division of Forestry & Fire Protection

The following people or organizations commented on the 2025-2029 SSE Five-Year Schedule of Timber Sales:

Abby Paris	Huntington, NY	James McKnight	Juneau, AK	Michelle Breinholt	Willow, AK
Adriana Bryan	Sitka, AK	James Taggart	Sitka, AK	N Lamken	Juneau, AK
Amanda Cronin	Seattle, WA	Janice Klinski	Olympia, WA	Nancy Taylor	San Diego, CA
Anette Mello	Boulder Creek, CA	Jeff Budd	Sitka, AK	Nathan Newcomer	SEACC
Benjamin Hughey	Sitka, AK	Jeff Sloss	Juneau, AK	Nicholas Dalessio	Girdwood, AK
Bert Corley	Clarksville, NH	Jill Wittenbrader	Kodiak, AK	Patricial Dangle	Montoursville, PA
Beverly Churchill		Jim Plymire	Homer, AK	Peter Hook	Sitka, AK
Bill McLaughlin	New Berlin, NY	Jim Rehfeldt	Juneau, AK	Philip Ratcliff	Salem, OR
Brian Gingras	Braintree, MA	John Etter	Monterey, CA	Rachel Youens	Brooklyn, NY
Carl Broderson	Juneau, AK	John Roche	Front Royal, VA	Rebecca Knight	Petersburg, AK
Charlotte Ciszek	Haines, AK	John Sonin	Douglas, AK	Rebecca Lexa	Long Beach, WA
Charlotte Tanner	Ward Cove, AK	JoLynn Jarboe	Denver, CO	Robert Vernon	Homer, AK
Cheryl Fecko	Craig, AK	Julian Gaeta	Gravina Island, AK	Salissa Chavez	San Tan Valley, AZ
Connie Harris	Palmer, AK	Karin Mccullough	Petersburg, AK	Sandra Ashmore	Norcross, GA
Connie LaPierre	Sitka, AK	Karl Ashenbrenner	Juneau, AK	Sarah Stewart	Watertown, MA
Craig Olson	Petersburg, AK	Larry Edwards	Sitka, AK	Scott Pierce	Haines, AK
Dan McMahan	Petersburg, AK	Alaska Rainforest Defenders		Sharon McEntee	Sutton, AK
Daniel Sullivan	Petersburg, AK	Lesley Kempzell	Hillsboro, OR	Shawn Emery	Denver, CO
Dave Hass	Juneau, AK	Lisa-May Reynolds	Ladys Island, SC	Simon Allen	Durham, NC
David Beebe		Lori Stephenson	Homer, AK	Staci Genet	Talkeetna, AK
David Bryan	Lewes, DE	Lynn Wilbur	Juneau, AK	Steve Smith	Jefferson, OR
David Lesh	Gustavus, AK	Mackenzie Parker	Mukilteo, WA	Susanne Badilla	Juneau, AK
Dennis Schaeff	Meadville, PA	Marc Dumas	Fairbanks, AK	Terri Yeager	Glenshaw, PA
Dierdre Downey	Juneau, AK	Margo Waring	Juneau, AK	Tessa Axelson	Ketchikan, AK
Don Muller	Sitka, AK	Mari Dominguez	Lodi, CA	Alaska Forest Association	
Donna Mulvey	Grants Pass, OR	Marian Allen	Sitka, AK	Tisa Becker	Douglas, AK
Doug Hill	Palmer, AK	Mark Minnillo	ADF&G	Tom Snyder	Anchorage, AK
Ester Gonzalez	Los Angeles, CA	MaryClaire Bernstein	Tenakee Springs, AK	Tresham Gregg	Haines, AK
Evelyna Vignola	Haines, AK	Matthew Kok	Juneau, AK	Tyler Henegan	Anchorage, AK
Gary Goetz	Pacific Grove, CA	Michael Stainbrook	Petersburg, AK	Virgene Link-New	Anacortes, WA
Hillary Hunter	Juneau, AK	Michael Stocks	Petersburg, AK	Virginia Bottorff	Syracuse, NY
Jackson Swanson	Gustavus, AK	Michele Cornelius	Gustavus, AK	Wesley Wolf	Lake Barrington, IL

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The following comments were received during the public comment period on the SSE FYSTS 2025-2029 ending on April 8, 2024.

Commenter	Comment
	SITE SPECIFIC
	Prince of Wales (POW) Island Area
Connie LaPierre	My first concern is on Prince of Wales Island where old growth harvesting has already impacted the whole ecosystem. Because much of Prince of Wales is a Karst landscape which is limestone, and contains many fissures, caves and systems that operate on not only the surface landscape, but also affect deeper systems, I believe that no more old growth cutting should occur on Prince of Wales Island.
Steve Smith	I have been to Prince of whale island several times to fish and enjoy the island. It would be a great place to develop for hikers and fisherman, but you have logged the Island from one end to the other. There are very little stands of old growth and it would be a terrible event if you cut down the remaining BIG TREES.
	Control Lake
Cheryl Fecko	<p>I am submitting my comments regarding the Five Year Schedule of Timber Sales for 2025-2029. I specifically oppose the sales proposed on POW in the Control Lake area and regions on and surrounding 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 land exchanges and selections that have cut up the Tongass piece by piece for one use-timber harvest.</p> <p>The Control Lake area has already seen enough clearcut logging. Since half of the area is designated General Use, and the timber not desirable, it would be better left as natural habitat. There is more value in retaining the existing forest for recreation and wildlife habitat, and enhancing the recreational opportunities at nearby Control Lake cabin, Eagle Nest Campground, and Balls Lake Trail.</p>
Nathan Newcomer, SEACC	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.
	Naukati Area
Cheryl Fecko	I support the concerns of Naukati area residents who oppose even more proposed clearcuts surrounding their community. Hopefully the State will take another look at these proposed units and either eliminate or reduce unit size and provide more than the required minimum buffers. Naukati has seen enough clearcut logging. The area should be given a rest.
Nathan Newcomer, SEACC	SEACC opposes all timber sales in the Naukati area. This area has been completely logged out in recent years, across several different ownerships. 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 2024.

Commenter	Comment
	Thorne Bay
<p>Nathan Newcomer, SEACC</p>	<p>SEACC opposes the 183 acres of proposed old-growth Stairway Sales 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><i>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 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 report 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.</i></p> <p>The Forest Resources & Practices Act (FRPA) directs that timber operators provide the following information in their Detailed Plans of Operation (DPOs): <i>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...</i></p>
	Heceta Island
<p>Larry Edwards, AK Rainforest Defenders</p>	<p>Heceta West is General Use land that runs along the shoreline. There are several anadromous streams in these units and headwaters to a lake best left intact for fishery values, and a wolf den which likely occurs within one of the remaining old growth stands.</p> <p>Defenders requests that you remove these remote sales from the 2023-2027 FYSTS. None of them are accessible to small local timber operators, and all of them will impact remaining scenic values and fish and wildlife habitat.</p>

	Kosciusko Island
Larry Edwards, AK Rainforest Defenders	<p>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 all timber landowners on old and second growth forests should drive decisions to reduce impacts from additional sales in the Edna Bay area.</p> <p>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 these areas intact. Southeast State Forest lands in these units buffer community viewsheds, are adjacent to anadromous fish streams and provide some of the little remaining old growth habitat for deer and large oldgrowth trees for bald eagles along the shoreline. Old-growth units recently logged south of the community were some of the best remaining deer winter range for a resident deer population, supported bear denning habitat, and sheltered the community of Edna Bay, its harbor facilities and mariners from severe windstorms. The recently logged units, as well as the as yet unlogged Kosciusko East units occur within or just above beach fringe areas which are some of the most important habitats in Southeast Alaska. Much of the existing beach fringe on southern Kosciusko is already non-functional due to clearcutting, increasing the importance of remaining corridors.</p> <p>The Division also proposes to sell four million board feet of second growth forests from 140 acres of Southeast State Forest lands north of Edna Bay, east of Charley Creek in 2025. This second sale will be clearcut and require 0.6 miles of road construction. The new clearcuts will prevent recovering forests from achieving old-growth characteristics, and reduce long-term habitat values for wildlife by prolonging the stem exclusion phase of forest succession.</p>
	Suemez Island
Larry Edwards, AK Rainforest Defenders	<p>“The project would require 2.2 miles of road construction that would cross numerous headwater streams that drain into anadromous fish streams. The FYSTS also identifies economic concerns related to species composition, timber type, and road construction and mobilization costs”</p> <p>Defenders requests that you remove these remote sales from the 2023-2027 (sic) FYSTS. None of them are accessible to small local timber operators, and all of them will impact remaining scenic values and fish and wildlife habitat.</p>
	Ketchikan/ Gravina Island
Julian Gaeta	<p>Is there anywhere I can find more information on the logging operation adjacent to my property? I am a landowner block 6 lot 2 but am active duty military and have not been back there in some time.</p> <p><i>AK DOF responded with link to SSE timber sale schedule and plans, as well as a map depicting timber activity near the lot in concern.</i></p>

Larry Edwards, AK Rainforest Defenders	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.
Ketchikan/ Revilla Island (George Inlet)	
Larry Edwards, AK Rainforest Defenders	Revilla is the most important island or area for deer hunters from Ketchikan in Game Management Unit 1A. Given the potential for massive cumulative impacts caused by past logging combined with the 4,300 acre, 100 million board feet Alaska Mental Health Trust sale, the Division of Forestry should leave the 345 acres intact for multiple use purposes.
Mark Minnillo, ADFG	Although 103 acres of this proposed area is located on State Forest/General Use designated lands; 29 acres are located on lands designated as Habitat and are part of the larger Central/Southern Southeast Area Plan (CSSAP) Habitat designated lands (K-50) around the saltchuck at the head of George Inlet. According to the management intent K-50 is to be managed “consistent with the need to protect wildlife, wildlife movement corridors, and habitat areas. Development is not to be authorized except for necessary public facilities, including electric power and a “regional road”. There are several anadromous streams and documented bear, wolf, and waterfowl use within the Habitat designated area. This area has been found to be important for fish and wildlife and has been set aside as such. The Forest Service and Private lands surrounding the Habitat designated area has been or is being harvested. Any additional harvesting of the Habitat designated area will result in a reduction of this important habitat and would be contrary to the CSSAP.
Nathan Newcomer, SEACC	Only 103 acres of this 345 acre proposed sale is on Southeast State Forest land, the rest of the acreage is either General Use land or classified Habitat. 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.
Mitkof Island	
David Beebe	<p>The Petersburg borough has been recently contacted in preparation of these comments in order to ascertain any concerns they may have. As a matter of fact, there has been zero notification by the division of forestry directly with the borough up to this point. This also defeats the importance of planning as well as, quality of borough residents' ability to provide informed comment on this five year state timber sale program.</p> <p>I inquired with ADF&G Wildlife division regarding access to its comments on the FYSTS 2025 to 2029 document. The purpose of doing so was to provide opportunity for informed comments regarding state biologist concerns of 1213 acres of low elevation south facing OGF timber sales on Mitkof Island. The fact that the public comment period relies upon state resources to cite reflecting their concerns, denies access to and defeats the purposes of public comment from residents of the directly affected communities. These communities rely upon subsistence resources from OGF ecosystems.</p>
Dan McMahan	<p>Frederick Point Salvage Sale</p> <p>The map for this sale shows a proposed harvest along road 6204, the Cabin Creek road in section 15. Because of the scale of the map it’s hard to figure out what exactly the plan is there. On the ground in that area today there are 2 previous cuts, a small one for less than 10 acres or so that was logged by Jeff Hupp. The second cut is much larger and is to the south of Hupp’s cut that extends</p>

	<p>towards Pan Creek. My comment refers to the existing leave strip between these 2 existing cuts. I can't tell by your online map if the leave strip is within your proposed cut or not. I respectfully ask that you leave the leave strip uncut. Within the leave strip is an unusually active game trail that that offers family safe access between lower elevation and somewhat higher ground....I think the leave strip is important to both game and subsistence users and I'd hate to see it go to a partial load of logs heading overseas.</p>
Daniel Sullivan	<p>All of these timber stands are old growth leave strips between extensive clearcuts that were harvested when I first moved here as a layout forester for the USFS. None of these stands should be harvested currently.</p> <p>They are nearly all on steep broken ground which is why they were left. The proposed unit near Greens Camp is a heavily recreated area for residents and tourists. A small unit near here was harvested 5 years ago and has regenerated to heavily alder. Blowdown and landslides occur frequently on the south end of Mitkof Island. None of the units on Mitkof should be harvested until the adjacent clears cut are of least commercial harvest size. The large volume of dead hemlock should be left standing and fall naturally – it has little commercial value as dead standing timber, and as we all know, there is no market for pulp wood. The amount of viable sawlogs will be low compared to the acreage cut, likely leaving most of the gross volume on the ground and deserted by deer and moose for 20 or more and unnavigable for hunters for at least 30 years.</p> <p>It appears that most of your data for these sales is from satellite imagery. For some areas, there isn't enough information to give meaningful input. If you have not had foresters on the ground in all these areas, it would be negligent to have these in a proposed sale area. I cannot speak for areas outside of my neck of the woods but all these units on Mitkof Island should not be included in this plan.</p>
David Beebe	<p><i>FYSTS (Pgs. 14,16 & 17) Mitkof Sales</i></p> <p>The FYSTS 2025-2029 as planned, directly threatens commercial fish Industry capacities which represent a vital economic revenue stream for Southeast Alaska. It also undermines the capacity of resilience to climate disruption by exacerbating the ongoing climate, crisis and associated ocean, warming, and ocean acidification.</p> <p>The consequences of commercial logging on Mitkof Island have resulted in an unprecedented requirement to have a deer season closure lasting 17 years. Mitkof Island remains the lowest harvest of deer and shortest. Season in all of southeast Alaska. The existing remnant low elevation habitat of OGF are essential to maintaining sustainable populations of deer, marten, bear, and salmon.</p>
Typical Form Comment	<p>Mitkof Island has beach buffer areas that should be left intact for wildlife and other uses. Old growth beach fringe is prime habitat for deer in winter, as well as so many other animals all year round. I oppose all logging on old growth beach buffers and old second growth on beach buffers on Mitkof island and other places in Southeast Alaska.</p>
Larry Edwards, AK Rainforest Defenders	<p>Fredrick Point</p> <p>Frederick Point salvage sale near Petersburg, which would remove timber from 219 acres, including an undisclosed amount of area affected by a hemlock sawfly infestation in fall 2023. The area has a subdivision and multiple salmon streams and trees used by nesting bald eagles. There are also steep slopes on the Frederick Point side of Mitkof Island, increasing potential risks from a timber project in this area. The FYSTS does not describe the extent of the fall 2023 infestation, so it is unclear whether this sale would also remove healthy old-growth trees. Defenders requests that you downscale or eliminate this sale from the schedule given the proximity to a community and resource risks.</p>

	<p>South Mitkof The South Mitkof sale would remove five million board feet from 625 acres of mixed old and second-growth forests located on “coastal mountainous terrain” on the southeast side of Mitkof Island. Access would occur via the Mitkof Highway and the project may affect nine salmon streams. The Woodpecker Cove sale would remove five million board feet of old growth timber from 369 old-growth acres near Woodpecker Cove on Mitkof Island. The proposed amount of logging would degrade multiple use values for deer winter range, salmon habitat, bald eagle nesting trees, camping and recreation and Sumner Strait scenery. There are also soil stability risks.</p> <p>These large sales, obviously designed for a distant timber operator, would remove some of the limited deer winter range on the southern shore of the island, damage salmon streams, degrade scenery, and entail high public safety risks given the history of landslides along Mitkof Highway.</p>
<p>Mark Minnillo, ADFG</p>	<p>Woodpecker Cove: The 369 acres of low elevation south-facing old growth timber in the Woodpecker Cove area provide important habitat for Old-growth associated or dependent species such as American martens and Queen Charlotte Goshawks, and Sitka black-tailed deer. The management goal for the Unit 3 deer population is to achieve and maintain a population of 15,000 deer while maintaining an annual harvest of at least 900 deer. The estimated deer harvest in Unit 3 was 817 in 2022, up from an average of 730 deer between 2017 and 2021.</p> <p>General: Petersburg, on Mitkof Island, has a population of 3,000 residents and is the largest town in Unit 3. Between 2018 and 2022 an average of 263 Petersburg residents reported hunting deer on Mitkof Island, resulting in an average harvest of 122 deer. The reported harvest of 144 deer by 284 hunters in 2022 was the highest in several years. The proposed Frederick Point, Woodpecker Cove, and South Mitkof timber sales encompass land that is very popular with local residents for deer hunting. Accessibility to these areas is good due to existing road infrastructure.</p> <p>Winter habitat in the form of low elevation, high volume old growth is the most important and most limiting habitat for deer. According to United States Forest Service data only 56% of historic productive old growth forest < 800’ elevation remains on Mitkof Island. New clearcuts and roads may initially increase hunting opportunity but will result in a long-term decline of ungulates due to reduced carrying capacity as stands mature to second growth forest.</p>
<p>Rebecca Knight</p>	<p>On Mitkof Island where I reside, there are proposed sales on Fredrick Sound, near Blind Slough and on the Woodpecker south shore, and in East Thomas Bay. These sales are of huge concern to me. Not only will they degrade habitat values, accelerate landslide potential, but will also be a blight on the landscape of our beautiful island community which has already seen its share of clearcut logging.</p> <p>The slopes on the south end of Mitkof Island are some of the best remaining deer habitat on the island, which are south facing and below 800 feet in elevation and will be destroyed by your proposed action. Moreover, the narrower fish stream buffers (than federal regulations) are often ineffective. Many of these buffers blow down after clearcutting and will be especially vulnerable to the documented high winds on the south end of Mitkof. Clearcutting these acres will be a risk to public safety.</p>

Thomas Bay	
Larry Edwards, AK Rainforest Defenders	<p>Given the low value of this sale area (Thomas Bay) for any local operator, and the need to maintain these General Use lands for more important public purposes, the Division should remove this sale from the FYSTS.</p> <p>(Re: moose and deer habitat in Thomas Bay area)</p> <p>Impacts from past logging are a particular concern for mainland areas where snow interception capacity is much more critical for wildlife. Clearcuts create a temporary forage enhancement that last for just the first 25 years of a 100 to 150 year timber harvest rotation. After 25 years, the recovering forest shades out and eliminates forage species. Local wildlife managers explain that “[t]he short-term advantages of clearcutting for moose may be offset by the longer period of reduced forage in the second-growth conifer forest and the loss of shelter habitat for moose during the time when the area is clearcut.</p>
Mark Minnilo, ADFG	<p>Aerial imagery from the harvest area shows historic movement of Patterson Creek across the flat landscape. We recommend DOF plan to retain timber in the 100–300 ft riparian management zone for the maintenance of important fish and wildlife habitat. Aerial imagery and GIS analysis suggest there may be unidentified anadromous streams within the proposed harvest units. ADF&G Habitat staff plan to visit the area in 2025 to conduct anadromous waters surveys and will coordinate with the Division of Forestry at that time.</p>
Rebecca Knight	<p>My family has relied for years on deer harvested from the Thomas Bay area. In fact, the venison chili I made two days ago was likely 2023 Thomas Bay venison that we put away in our freezer. Your proposed action will impact our subsistence use of deer there. Also, while clearcutting “may” increase moose browse, it will only do so for a limited time before the stands enter the stem exclusion phase again, shading out all browse beneficial to a wide variety of species—not just moose— thereby creating a perpetual (and expensive) cycle of clearcutting and thinning to maintain moose populations.</p> <p>In the case of the Forest Service Thomas Bay timber sale, its analysis for that sale conveniently ignored the impacts of logging in overlapping proposed Native selections and adjacent State ownership as not foreseeable. It erroneously relied on the availability of other habitat outside of the project area to support a finding of no significant impact— and stuck their collective heads in the sand as if those acres were not a serious risk of major habitat alteration. Your analysis must consider the cumulative impacts of the FYSTS, Native selections, and the FS Thomas Bay Timber Sale.</p> <p>It is not surprising that the ink was barely dry on the FS Thomas Bay Decision document when the State promptly published the SSE FYSTS. Economies of scale will prevail in the timing of sister Federal, State, and Native timber sales, which makes the devastation more likely.</p>
Wrangell Island	
Larry Edwards, AK Rainforest Defenders	<p>Earl West</p> <p>Defenders also requests that you downscale or remove the proposed 2026 Earl West Cove sale on Wrangell Island. This sale would remove three million board feet of old-growth timber from roughly 160 acres of Southeast State Forest land in the Earl West Cove area on Wrangell Island. Timber in this area is marginal because most of the timber is hemlock and there are high mobilization costs. ...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. Earl West Creek is an important anadromous stream with several tributaries</p>

	in the sale area and the 2016 SESF Management Plan record indicates that it is an important local recreation area, particularly for sport fishing.
	Small Sales
Cheryl Fecko	Hope the state of Alaska moves towards smaller harvest units, making use of available young growth with extensive wildlife corridors and areas set aside for wildlife that won't become logged in some future land selection or exchange.
Larry Edwards, AK Rainforest Defenders	<p>This FYSTS proposes a larger amount of timber than local operators purchase and in areas that, if all cut, would, in terms of environmental impacts, be similar to large sales. We request that you downscale these “small sales” in the final FYSTS.</p> <p>This proposed small sale program far exceeds [2022 small mill] purchases.</p> <p>“parcels of Southeast State Forest lands intermixed with larger amounts of public land classified for other purposes, mostly for settlements planned several decades ago that are now either speculative or abandoned.” The Naukati and Control Lake 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 submits that the Division should reduce the small sale pool to volumes that are realistic for smaller operators and remove all non-Southeast State Forest lands.</p>
Nathan Newcomer, SEACC	<p>SEACC has seen the Forest Service work with small mill operators on an increasing basis over the past decade, so it seems possible that the State could refocus its operations on POW toward small mills, and sales where access can be provided through the 3,000 miles of existing roads.</p> <p>In this FYSTS, more discussion is devoted to small mills and smaller sales, which SEACC sees as positive. The schedule should provide more information 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.</p>

	PROGRAMMATIC
	FYSTS Planning, Sustained Yield, AAC, Cumulative Impacts
Typical Form Comment	The State is required to take a hard look at cumulative impacts and consider each sale in the context of harvests that are occurring on adjacent land ownerships. For some sales, there isn't enough information to give meaningful input. These sales should not be included in the schedule.
Cheryl Fecko	<p>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, especially sales that target western red cedar. Prince of Wales Island is the northern extent of WRC, so I seriously question whether the rate of WRC harvest is sustainable when you consider that some of these trees are 1000 years old! No WRC should be shipped out in the round, and the State should quit targeting red cedar.</p> <p>The cumulative impacts of previous, current and future harvests by different land owners over the years should be addressed when selecting units. Prince of Wales Island more than other islands faces this habitat fragmentation. These cumulative impacts have never been given enough consideration, and now it is more important than ever.</p>
Connie LaPierre	I would say that the state has a large obligation to the earth over timber companies. We all live on a planet increasingly assaulted by industry. The state can remain locked in past practices or try to find different solutions. I am not against logging per se, just against how it has and continues to be practiced. It seems that there are many more considerations that should be taken into account rather than having tunnel vision towards timber industries over the long term health of the forests and the planet.
Nathan Newcomer, SEACC	<p>“the old-growth that is left tends to be high defect, lower value timber on low-medium site classes in terms of regeneration. 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. State forest land must be managed under the principles of multiple use and sustained yield. The state is required to take a “hard look” at cumulative impacts by the Supreme Court:</p> <p><i>SEACC References Sullivan v. Resisting Environmental Destruction on Indigenous Lands (REDOIL), 311 P.3d 626, 634 (Alaska 2013) and Ninth Circuit Cour citation Sullivan v. Resisting Environmental Destruction on Indigenous Lands (REDOIL), 311 P.3d 626, 634 (Alaska 2013) to describe the importance of cumulative impacts.</i></p> <p>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. The DOF has an opportunity currently to evolve Alaska’s timber industry into a truly sustainable model, one that looks more like the carefully managed Michigan forests that the Governor’s administration compared to Alaska in terms of their carbon offset program, rather than trying to satisfy an outdated approach timber strategy and prop up a single large mill on heavily-logged Prince of Wales Island.</p>
David Beebe	The FYSTS 2025-2029 as presented, and prescribed, destroys Structure, Function, and Composition of Old-Growth Forest (OGF) ecosystems. The resulting tree plantations are incapable of sustaining OGF-Dependent species which constitute essential subsistence resources for remote rural communities.

	<p>The FYSTS 2025-2029 violates capacities for Sustained Yield of Old-Growth Forest (OGF) Communities Providing Multiple Uses and Regular Periodic Outputs to (OGF)-Dependent Rural Communities of Southeast Alaska.</p> <p>Left intact, old growth forest communities structurally, functionally, and compositionally have provided “Sustained yield” in Southeast for thousands of years. Further, OGF communities of southeast Alaska intrinsically demonstrate "achievement and maintenance in perpetuity of an annular and regular periodic output of various renewable resources of the State land consistent with multiple use.”</p> <p>The old growth forest communities being targeted by the FYSTS already meet the State definition of “regular periodic output.” old growth forest communities have been doing this for centuries — naturally protecting providing and producing Life — far exceeding the ten year period policy of “regular periodic output.” Intact old growth temperate rainforest ecosystems are capable of providing manifold ecosystem services and subsistence resources including substantial economic benefits from tourism and recreation to remote rural communities of Southeast Alaska. Intact OGF communities are increasingly rarified, and are intrinsically far more economically, culturally and socially valuable — but only if left intact. It is widely recognized OGF being reduced by the State of Alaska to mere market commodity status for corporate profiteering defeats the sustainability of existing revenue capacities of responsible economic policy.</p>
<p>Rebecca Knight</p>	<p>This proposed action would clearcut vast areas of the remaining higher volume old growth timber in the Southern Southeast Alaska panhandle. Unfortunately, the Alaska Forest Resources and Practices Act (FRPA) has no limit on the size of clearcuts, and thus it is reasonable to expect clearcuts that are only limited by ownership boundaries or the skimpy and ineffective fish stream buffers under FRPA will prevail. Despite that these practices are permissible, they are unethical and reflect third world forest practices that should be outlawed.</p>
<p>Tessa Axelson, Alaska Forest Association</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 <u>not require that timber be harvested in a nondeclining yield basis over a rotation period</u>" (emphasis added).</p> <p>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.</p>

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). Most of these lands are not available for timber harvest and many 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. It would be helpful to a reviewer if the data within the maps were consistent. Some maps show existing road systems as "proposed" and other maps lack "proposed road routes" where it is apparent that new roads will be needed to harvest the units as shown on the maps. It would also be useful to show existing managed stands on the maps and to indicate on the maps which sales or sale areas are young growth or old growth. However, AFA was concerned to read that the schedule is conceptual in nature given the staffing shortages in the region. Several times within the 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 request 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 2025-2029 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. This shortage is more concerning with the inclusion of several projects that have significant hurdles to overcome prior to a timber sale being offered, such as obtaining special use permits from the USFS that require NEPA, other federal and State agency permits, costly bridges and infrastructure development. Other projects are linked to USFS projects. Such linkage has proven to be problematic in the past. One project (Kosciusko East) will be sold during FY24, and that volume should not appear as a project in the FY25-29 FYSTS. Those problematic projects areas should remain within the FYSTS but additional project areas need to be included to prevent any disruption in State timber sale offerings.

The Alaska Forest Association (AFA) requests that the Alaska Division of Forestry and Fire Prevention (DOF) offer for sale, in southern southeast Alaska, a minimum of 100 mmbf of old and young timber over the next 36 months. This volume is needed to replace the federal owned timber volume that has not been offered since the July 2021 press release by USDA Secretary Vilsack. That press release directed the Tongass National Forest to violate national laws and Forest Plan directions by immediately transitioning to a timber sale program dependent on sustainable Young Growth harvest while limiting Old Growth harvest to an average of 5 mmbf annually. Since that press release the Tongass National Forest has sold an average of 3 MMBF annually. This is in sharp contrast to the 40+ mmbf annual demand calculated by the USFS under the Tongass Timber Reform Act (TTRA). Per the

	<p>2016 Forest Plan for the Tongass, the Projected Timber Sale Quantity for the Forest is 46 MMBF annually. Volumes offered for sale by the DOF could come from the following areas:</p> <ul style="list-style-type: none"> • 95 MMBF can be harvested over 10 years on a sustained basis from the Southeast State Forest and General Use lands available for timber harvest. • Additional volume can be obtained from lands designated for Settlement by Area Plans if done to "support eventual subdivision development." • From State lands not traditionally available for timber harvest with approval for harvest from the Division of Mining, Land and Water. • From State road right-of-ways on State lands. <p>In support of this request, AFA proposes that timber volumes could be obtained from the following state lands that are not managed by the State on a sustained yield basis:</p> <p>CENTRAL/SOUTHERN SOUTHEAST AREA PLAN Management units W-13, W-14, W-17, and W-28- Thoms Lake and Thoms Creek on Wrangell Island Management Units W-19, W-20, W-21, and W-22 - Bradfield Canal- mainland near Wrangell Management Units C-01 and C-03 - Cleveland Peninsula Management Unit K-03 Virgin Bay - North Revilla Island Management Units K-10, K-11, K-17, and K-50- Upper George Inlet- Revilla Island Management Unit K-39 - Ketchikan South on road system Management Unit K-39 - Carroll Inlet - Revilla Island</p> <p>PRINCE OF WALES ISLAND AREA PLAN Subunit 1b - Exchange Cove - east side of POW Subunit 4a- El Capitan -west side of POW Subunit 4b - El Capitan Island - west side of POW Whale Pass Addition - Whale Passage - east side of POW Subunit 6a - Coffman Cove - northwest of community - east side of POW Subunit 7b - Tuxekan Island - near Naukati, west side of POW Subunit 10a - Heceta Island - off west coast of POW Subunit 12a - Harris River Junction - was this parcel relinquished? - near Hollis - east side POW Subunit 12b -Along Klawock-Hollis Highway-west of Hollis Subunit 13b - Kitkun Bay/ Lancaster Cove - east side of POW Subunit 14c - Ingraham Bay- southeast side of POW</p> <p>PRINCE OF WALES ISLAND AREA PLAN AMENDMENT Management Unit 17 -C-02, C-03, C-04 and C-05- between 12 Mile Arm & Trocadero Bay</p>
Larry	We request that you prepare a revised FYSTS that substantially downscopes the large sale program to address fish and wildlife

Edwards,
Alaska
Rainforest
Defenders

habitat needs and provide additional ecosystem resilience and community protection in a rapidly changing climate.

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 2025-2029 planned timber sales resulting from previous logging in combination with future logging planned by Forest Service and other state entity 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.

The Division proposes to log a significant amount of acreage outside of the Southeast State Forest, including areas zoned for general use, settlement and recreation lands under the 1998 Prince of Wales Area Plan. Defenders request you cease planning on timber sales in these areas. Plan decisions made in 1998 were based on assumptions about projected resource uses and socio-economic and environmental conditions over a twenty year period that ended six years ago. The plan is now outdated under its own terms. The Department of Natural Resources recognized that planning assumptions may change, necessitating a periodic review. Factors that precipitated the 1998 plan revision included changes to the timber industry such as mill closures and market failure, new socio-economic conditions and the need to maintain fish and wildlife resources. Since the turn of the century Southeast Alaska has undergone a market-based transition away from the timber industry and relies more on fishing, recreation and scenery resources. Planning timber sales for speculative settlements and in general use lands that are now much more valuable for non-timber purposes is unreasonable. A revised FYSTS should also lower impacts to Southeast State Forest lands.

There are already large areas of adjacent clearcuts on southern Kosciusko Island and the additional clearcuts would enlarge an already vast expanse of recently clearcut forest. (Note well: This problem recurs throughout areas affected by sales proposed in the 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.)

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 socio-economic changes. It is unacceptable to rely on outdated land classifications. DOF’s planning processes need to recognize Constitutional requirements to provide for the sustained yield of fish and wildlife.

“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

	<p>relevant to wildlife”</p> <p>We request that the Division of Forestry prepare a substantially downscaled FYSTS to accommodate sustained yield principles for other resources.</p> <p>Finally, Defender notes that all of these units will involve logging adjacent to salmon streams and entail multiple road crossings. Salmon are highly vulnerable to the changing climate and logging and timber road construction will exacerbate these risks, particularly the concerns discussed in Section II: warmer, dryer summers and wetter winters with higher flooding and landslide risks. For this reason, and the above stated reasons, Defenders requests that you substantially downscale the 2025-2029 FYSTS.</p>
Carl Brodersen	<p>DNR's 5 year plan is biased towards extractive industry that enriches only a few, unconstitutionally so.</p> <p>The critiques are numerous and already on record. Heed them. This is a bad plan. Revise it to benefit all Alaskans, not just a few guy who own mills and probably contribute to Dunleavy's coffers.</p>
Adriana Bryan	<p>Our future generations of Alaskans deserve and expect a thorough analysis process. As cliché as it sounds, their future depends on the decisions we, you, make now.</p>
Typical Form Comment	<p>I care deeply about Southeast Alaska and wish to see its forests thrive, which requires responsible management by the State, consistent with the public interest, as mandated by the Alaska Constitution. This plan appears to prioritize supplying timber for the benefit of the industry. Alaska's intact old growth forests play an important role in climate change mitigation by capturing and storing carbon. The State of Alaska can even earn revenue through carbon offsets with the passage of SB48, yet there is no mention of carbon offsets in the schedule of timber sales. Utilizing State managed forests for carbon offsets would provide revenue on top of the many other benefits to leaving the trees standing.</p>
Multiple Use Management	
Benjamin Hughey	<p>I grew up in the Forests of Southeast, based in Sitka, but traveling to fish and hunt. Managing our public forests in the broad public interest is essential to the well-being of our communities in so many ways, but it appears that this plan is prioritizing the timber industry over other values.</p>
Nathan Newcomer, SEACC	<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 Scientists:</p> <p><i>SEACC references ADFG 2020 Deer Management Report and Plan</i></p> <p>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 years.</p>
David Beebe	<p>The multiple uses recognized provided by “Productive” OGF include manifold ecosystem services which are unrivaled in multiple use efficiencies, resilience and self-propagating capacities. This includes habitat-dependent wildlife, watershed protection, carbon</p>

	storage, wild salmon habitat crucial to sustaining extant, diverse, abundant, and discrete megafauna crucial to remote rural communities of Southeast Alaska.
Rebecca Knight	The highest and best use of these stands are for carbon sequestration and protection of valuable fish, shellfish, and wildlife habitat which ultimately benefit all
	Timber Harvesting Support/Opposition
Michael Stocks	Finally, someone is on the same page, (fire threat!). Our island has so much dead standing trees and snags on it. Crystal Mountain north and south are the worst. If our island ever catches fire on the south end with a north wind this rock will be a piece of charcoal. No one here seems to care about fire threat. It's all about the fish and crab!! I am a big supporter of the timber industry or what is left of it. I cut timber in Southeast for 15 years. I believe that trees are like a garden, when things are ripe they should be picked. The amount of timber you are proposing to log is one toothpick out of a box of toothpicks. Clear cuts provide feed for deer and moose. You know, like the Prince of Wales Island. One of the best hunting in Southeast, because they log! I would love to see fire prevention on Mitkof and some logging as well. Good luck and I hope to see a tree cut soon.
Hillary Hunter	I am from Petersburg and live in Juneau now. I strongly oppose the old growth logging planned in general and on Mitkof. It is not a renewable resource. We are not a warehouse for the rest of the country to turn to now that they have destroyed their own homes. There is nowhere else to go for the animals that need it, the planets systems that rely on carbon sequestering, and the human souls that connect to wilderness. This is home not a yard sale. Please consider carbon credits.
Cheryl Fecko	This schedule of timber sales proposed for Prince of Wales Island and surrounding islands including Sumez and Heceta should move away from old growth logging not targeting it, especially Western Red Cedar. 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.
Nathan Newcomer, SEACC	The FYSTS proposes a series of small, medium, and large timber sales on Prince of Wales Island and surrounding islands (Kosciusko, Heceta), Gravina Island and George Inlet near Ketchikan, and Earl West Cove south of Wrangell. The total volume of old-growth acres proposed for harvest on state lands designated as either Southeast State Forest or General Use is approximately 1,859 acres in addition to 1,941 acres of mixed age sales, excluding several sales for which old-growth acreage was not provided: Naukati, Gravina. The total volume of old-growth and mixed age timber to be harvested, excluding young-growth volume and unknown volumes, is approximately 55,400 BF-55.4 million BF. 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. 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. 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.
Rebecca Knight	<p>Under this plan an estimated volume of nearly 62 MBF of timber will be removed from otherwise productive and recovering forested habitat of Southern SE Alaska. That is a huge amount to be taking from already degraded landscapes. I request that you stand down from any of the actions proposed in the FYSTS (however, I do realize this request will be ignored). I am a 49-year resident and former Forester and fully understand the dynamics at play. Propping up a dying SEAK timber industry until the last stick of economic timber has been cut and then exported in the round makes no sense. The net benefits to the residents of this region are less than zero.</p> <p>I oppose any further logging of mature and/or old growth timber, whether it be in the SSE Panhandle or elsewhere.</p> <p>I stand with the majority of SE Alaskans who do NOT want the devastation and boom and bust timber economy, continually inflicted upon us.</p> <p>I oppose any further logging of mature and/or old growth timber, whether it be in the SSE Panhandle or elsewhere. The public record attests to the repeated concern for all of the above species. While my comments are brief, my concern for the damaging impacts of the proposed SSE FYSTS is major. Please stand down from any further SSE AK timber extraction and give the people, flora, and fauna of SE Alaska a much needed break.</p>
Charlotte Ciszek	This issue is extremely important to me, my community and many other communities in southeast. Logging can destroy habitat for deer and ruin the spawning habitat for salmon. Many southeast communities rely on subsistence as a way of life. Logging is never worth the short term profit. Please stop cutting down old growth forests and use them for carbon offsets instead.
Michael Stainbrook	You need to look Our Forest with new eyes, clear eyes, eyes to the present the past -and - especially the future. The days for Forest use directed to one industry are past ,in-fact as we now know a Big Huge Environmental global catastrophe. Take a deep breath, slow down, when we put a saw to Old Growth we are putting a saw to our future. No more industrial Old Growth logging.
Beverly Churchill	Perhaps we should not just consider the taking of trees as an economic asset of our forests, as this is so 20th Century. Yes, our economy still relies on wood products, but much of this is being handled by tree farms and land already harvested.
Don Muller	No more logging of state forests. Your main “customers” are NOT the timber customers.
Evelyna Vignola	I am one who still believes that paving paradise to put up a parking lot is a bad idea. You may be a committed member of the predator culture and I'm here to say life does not work that way, please be part of a life-giving culture, please stay on the for-the-living side of things. Everything that has a beginning has an end and please don't send our wonderful trees on the road to becoming someone's junk when they can feed the souls of so many by being left alive. Thank you.
Jim Rehfeldt	Logging is detrimental to the economic, recreational and ecological sustainability of the Tongass. It eliminates these values for a single extractive process that takes decades at again provide value to this region. Better management can be achieved by leaving the forest intake so all who live and visit here can prosper from this incredible rainforest.
Tresham Gregg	<p>The logging industry has traditionally been a financial boondoggle, and would continue to be so.</p> <p>The Tongass forest is one of the last remaining major oxygen producing areas of the world, and it is our responsibility to keep it so for our future survival . If logging is to be done here, it should be for our use only, or for timber products that we create. Clear cutting is an abomination to both the view shed, health of the land and fisheries.</p>
Robert	I've worked Coffman Cove, Craig, Thorne Bay, Klawock, Edna Bay and Naukati. Much to my chagrin I could see how forest lands

Vernon	were scalped. (I was a thinner one summer.). I believe the future of Alaska is in intact ecosystems, not clearcuts. Please understand most Americans and Alaskans would rather experience wildlife than industrial logging.
John Sonin	There is nothing more "consistently" critical to the human consuming condition than to insure perpetuation of the civil sustenance in a sustained economic base, ergo, the license of our Forestry Service sanctions only that you constrain the diminutions of our overstretched Earthsystem dynamic consequent over-drawn resources. That implores conserving all remaining wild/natural biomes for it is those already from which extracted that have amounted in the ecological desecration enflaming the climate crisis we now endure, at an incredible expense, both ecologically and economically, mind you, of the present and future to our innocent offspring!
Virginia Bottorff	I'm utterly shocked that such thoughtless action could be taken by the state of Alaska! Doesn't the Forestry Department represent the people? The people of the United States aren't backward morons, we know how utterly important and precious our NATURAL RESOURCES are! We want them to stay intact and in fact, want them protected and defended as they should be. I can't envision that timber sales could take precedence over a pristine environment. Greed should never come before importance and beauty! We, as humans, are intricately twined with places such as this. Would you therefore deprive us of an existence that benefits humanity? I say no.
Mackenzie Parker	Please protect our old growth forests for the sake of our planets health and for future generations.
	Markets
Cheryl Fecko	Some of these sales may 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, including Viking Lumber.
Nathan Newcomer, SEACC	SEACC opposes round log exports. Timber harvested in Southeast Alaska should be milled in Southeast Alaska. Round log exports diminish the timber supply available to local mills and provide minimal economic benefit for Alaska.
Philip Ratcliff	The Division of Forestry seems to be making decisions with only its "customers" in mind — yes, Eng did refer to large logging companies as "major customers," which fits with Governor Dunleavy calling Alaska "America's natural resource warehouse" back in 2018 — but the State has a constitutional mandate to develop its resources "consistent with the public interest."
Rebecca Knight	"not shipment in the round to Asia."
Lary Edwards, AK Rainforest Defenders	It seems clear that the Division designed both Kosciusko sales for a non-local unprocessed log exporter. The Forest Service estimated a negative bid value for 20 million board feet of Kosciusko Island second growth timber: -\$2.4 million, or - \$116.51 per thousand board feet if half the timber was locally processed and the other half was exported. The timber would have had a small sale value if exported of \$600,000 at \$24.36 per thousand board feet. There were six small mills on Prince of Wales Island in 2021 that processed 0.1 million board feet of second growth timber. Most of these mills specialize in cedar, some almost exclusively. Cedar, which is rare in Kosciusko second growth stands, comprised

	<p>over three-fourths of the volume processed by these six mills in 2021. In total, Southeast Alaska mills in 2021 and 2022 processed 0.3 and 0.6 million board feet of second growth timber, respectively. These data suggest that the larger volumes are only viable for the region’s largest timber sale purchaser, Alcan/Transpac, a company that does not have any processing capacity in the region. Available second-growth would not support investments in processing capacity for at least another decade. The Vallendar Project EA assumed 100% export of young growth timber due to the high cost of logging in the region and “absence of young growth manufacturing infrastructure.” In 2018, the Forest Service’s analysis of Prince of Wales Island second-growth timber markets stated that:</p> <p><i>Young-growth-volume is assumed to be 100 percent export because there is currently no established market for domestically sawn young-growth Recent young-growth contracts with domestic processing have not been fully successful for the purchasers due to a lack of local markets for sawn young growth. Contracts where export of young-growth was allowed have been more successful for purchasers.</i></p> <p>It does not make sense to sacrifice these limited remnant old growth stands and other valuable forest resources in order to provide low value raw log exports that support non-local economies.</p>
	Jobs
Larry Edwards, AK Rainforest Defenders	Petersburg, Wrangell and Ketchikan have fully transitioned toward economies based on tourism and fishing. It is confusing how any of the proposed sales fit within the Division’s stated management intent of supporting local processors in these areas because the proposed volume far exceeds local mill capacity and the mix of species and age classes is a mismatch for local operators.
	Salvage Sales
David Beebe	“... Western hemlock mortality associated with the hemlock sawfly... from this pathogen (sic).” There is no associated "disease" because there is no pathogen associated with hemlock sawfly nor the damages of infestation. Using the excuse of a "salvage" sale justified by pathogenesis is inappropriate in that, there is a great deal of inherent value for standing snags in OGF as both repositories of carbon sequestration as well as providing important wildlife habitat for insectivores, avian, and mammalian cavity nesters, etc.
	Carbon Sequestration/Carbon Credits
Typical Form Comment	Alaska's intact old growth forests play an important role in climate change mitigation by capturing and storing carbon. The State of Alaska can even earn revenue through carbon offsets with the passage of SB48, yet there is no mention of carbon offsets in the schedule of timber sales. Utilizing State managed forests for carbon offsets would provide revenue on top of the many other benefits to leaving the trees standing.
Nathan Newcomer, SEACC	<p>In light of the new legislation designed to use carbon credits leases on State lands to earn revenue, it makes sense for the State to more closely examine all of its remaining holdings on POW in terms of value left standing versus the marginal short-term revenue benefit and long-term negative impact of more old-growth logging.</p> <p>The FYSTS offered no discussion on the new SB48 Carbon Offset Program legislation that enables the state to use carbon credits on State lands to earn revenue. Because of the rarity and higher value of contiguous old-growth and older second-growth forests</p>

	<p>in terms of high levels of carbon storage, both in soil and above-ground biomass, (<i>DellaSala, D.A.; Gorelik, S.R.; Walker, W.S. The Tongass National Forest, Southeast Alaska, USA: A Natural Climate Solution of Global Significance. Land 2022, 11, 717, at 3, 7 and Fig. 3. https://doi.org/10.3390/land11050717</i>) Southeast forest lands can realistically be expected to add value to the carbon offset program. 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 to consider high-quality old-growth parcels being considered now for harvest for participation in the new Carbon Offset Program instead.</p>
David Beebe	<p>The Alexander Archipelago and coastal mainland of Southeast Alaska represents the largest expanse of relatively intact old growth forests (OGF) in the world. These coastal temperate rainforests represent among the highest capacities for carbon sequestration and carbon sinks for storing carbon, in volume per acre, in North America and the rest of the world. These forests are crucial as recent research has demonstrated record levels of carbon dioxide in the atmosphere (419 ppm) are unprecedented in modern times. It is urgent that the state of Alaska cease the practices of primarily deriving state revenues in ways which will not risk accelerating the anthropogenic emissions of carbon dioxide into a self-reinforcing, "irreversible, catastrophic" positive feedback loop. The state of Alaska needs to evaluate and quantify all activities of State activities of extractivism for the accounting of all associated greenhouse gas emissions.</p>
Beverly Churchill	<p>In Alaska we have a huge opportunity to consider the economic gains of keeping our old-growth forests intact as carbon sequestration. I know the governor has been proposing such plans and the legislature is looking into this. So let us make this part of the plan!</p>
James McKnight	<p>The bottom line is that leaving old growth forests intact in Southeast Alaska makes the most financial sense, as well as the obvious advantages of trying to keep the earth from getting so hot that humans can no longer live here.</p>
Carl Brodersen	<p>Our forests, especially the old growth, are worth far more to us in place. How does the plan not even mention carbon sequestration? Sell credits and then keep the woods for tourism and local use.</p>
	<p>Fish Streams</p>
Larry Edwards, AK Rainforest Defenders	<p>Proposed timber sales would adversely impact salmon production through a combination of road construction activities in fish habitat accompanied by intensive clearcutting of second growth recovering forests — and the project cause these impacts at a time when the region’s salmon production capacity is highly variable due to multiple environmental factors. Forested aquatic ecosystems take decades to recover after logging. ...density of red culverts in the Thorne Bay area. There are nearly fifty of them (red dots). These fish passage obstructions are likely significantly impairing salmon productivity, which raises considerable concern about plans to construct additional timber roads throughout the island. Timber roads and clearcutting increase sedimentation, degrade water quality, fragment habitat, and increase high temperature events. Sedimentation of stream beds is a principal cause of declining salmon populations throughout their range. Roads are a primary cause of accelerated, ongoing, chronic sediment delivery that progresses downstream, degrading additional salmon spawning and rearing habitat. Large volumes of sediment from road surfaces, ditches and cut-and-fill surfaces traverse riparian zones and enter streams from multiple locations within a watershed. There is chronic sedimentation affecting fish habitat throughout Southeast Alaska islands that have been heavily impacted by clearcutting and timber road densities. It is nearly impossible to mitigate this impact. Intact riparian vegetation can capture and store some sediment, but once disturbed by roads or logging, most of the sediment passes through to stream channels.</p>

	Karst Geology
Connie LaPierre	We were told forty years ago that the forests would regenerate rapidly. Perhaps we did not know better, but now we understand that the Karst systems are very complex. The state does not have the same protections that the federal government has for assessing these systems, and the federal government has not done well either. Forty years on we can see what kind of regeneration is occurring. If the regeneration is so good, why are we not just cutting the second growth. The risk is not only to wildlife, but also to the fisheries, and the growing tourist industry.
	Landslides
Typical Form Comment	Some sales, like the Stairway Sales on Prince of Wales, put lives in danger due to potential landslide risk. Some areas have already been logged extensively, like Naukati and Control Lake areas. These sales should not go through.
Rebecca Knight	Many of the acres to be clearcut will occur on high hazard soils further exacerbating the potential for landslides.
Larry Edwards, AK Rainforest Defenders	One of the implications of intense precipitation events – and precipitation falling as rain instead of snow or rain-on-snow - is a corresponding increase in landslide risks and frequency because precipitation causes most landslides. Rain-on-snow events are fairly new to Southeast Alaska but likely to increase both flood and landslide risks in fall and winter due to the overall larger volume of water. Increased landslide frequency creates serious risks for public infrastructure and private property and public safety. Most of the increased landslide risks will occur during winter and fall seasons when the largest projected increases in single and multi-day precipitation will occur. Some areas – large coastal islands and the northern mainland closest to Southeast Alaska – will see the frequency of landslide hazard days increase by as much as sixty percent over the next three decades with 8 to 11 additional days of higher landslide hazards per year. In one day in October 2020, seven landslides buried and blocked roads throughout Prince of Wales Island. Many of the roads were vital connections between small communities and the larger cities of Craig and Klawock. ⁴⁶ Over the next month, landslides caused by heavy rain, high winds and saturated soil continued to threaten access to Craig along Port St. Nicholas Road. The Division of Forestry’s 2020 Forest Action Plan identifies ecosystem regulating services provided by Alaska’s forest that include air quality, water quality and climate regulation. ⁴⁸ Forests reduce runoff, mitigate high air temperatures, absorb carbon dioxide and provide protection from floods, landslides and storms. The economic value of these contributions from forests are of increasing importance, particularly regulating services that reduce risks caused by severe weather events. Forests moderate water flows into streams during peak storm events and mitigate the effects of high air temperature events on stream warming. Logging and timber road construction proposed under this FYSTS will reduce the economic value of these regulating ecosystem services, and worse, exacerbate damage to communities, salmon and other forest resources during severe weather events. Clearcutting is a logging method that removes most or all trees in an area which can be as small as 2.5 acres. It is a controversial and “destructive” form of forest management because of long-term, adverse environmental impacts that include habitat destruction, impacts to the water cycle, watershed degradation, climate change acceleration, loss of ecosystem services such as storm protection and air quality regulation, and impacts to recreation and landscape values. 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

	<p>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. For the above reasons, Defenders requests that the Division consider climate change risks to Southeast Alaska communities and forest resources and downscale the FYSTS. Many of the planned timber sales in this FYSTS abut communities and critical transportation routes, such as on Mitkof Island, and would increase public safety risks. 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>
	<p>Wildlife</p>
<p>Cheryl Fecko</p>	<p>Other major concerns include 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 continued 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.</p>
<p>Nathan Newcomer, SEACC</p>	<p>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 become clearcut openings. The science and evidence predict this impact on deer populations will worsen over the next decade. If the Alaskan public resoundingly opposes such timber sales, as has been the case on Prince of Wales for a number of years, how can the State continue to claim that those sales are in the “best interests” of the State? If the sales don’t benefit State residents, who do they benefit? If timber sales cause harm to residents, what “best interest” are the sales fulfilling?</p> <p>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.</p>
<p>Rebecca Knight</p>	<p>Second growth stands approaching economic viability should be allowed to revert back to Old Growth status. The acres that were initially targeted when the timber heyday first began, had the highest volume but also had the highest habitat values. Those values can be at least partially restored by simply allowing them to revert back to their original condition. Moreover, any transfer of logs from uplands to saltwater and beyond should be accomplished via barges-not logs rafts which ultimately degrade the sea floor and habitat for crab and other sea life from bark and other detritus that falls to the depths.</p>

	<p>Throughout your document you claim that “ADF&G will be consulted during the pre-fieldwork stage regarding wildlife habitat values. “So-called” ”consultation” is not a replacement for enforceable protections for wildlife habitat including for Queen Charlotte Goshawk, marten, Sitka Black-tailed Deer, and the Alexander Archipelago Wolf These are species which are ALL dependent on intact forest ecosystems.</p>
<p>Larry Edwards, AK Rainforest Defenders</p>	<p>The Division should downscale the FYSTS in order to alleviate 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. The intensive clearcutting across 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 increased their vulnerabilities to other threats. The 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. Substantial clearcutting continues on non-federal lands. Alaska Department of Fish and Game biologists expect the Prince of Wales deer population to decline because of habitat loss caused by logging. 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. There is increasing concern about ongoing population declines in POW deer populations as local hunters cite increasing difficulty harvesting deer. The Alaska Department of Fish and Game has explained that the cumulative adverse effects of past, ongoing and future industrial scale clearcutting are potentially severe.... 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. Prince of Wales and surrounding islands once had the largest wolf population in Southeast Alaska. Prince of Wales Island wolves are now the most vulnerable wolf population in the region, and are inbreeding, prey-limited, overly reliant on a single prey source, deer, and susceptible to excessive mortality from humans. Industrial logging directly and indirectly is responsible for population declines by creating less productive forest with lower habitat capacity for deer and a road network that increased human access. Wolf and deer abundances are intertwined – substantial reductions in deer populations caused by logging and succession debt will eventually result in smaller wolf populations. 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, like wolves, are susceptible to hunting and, like deer, experience significant succession debt impacts – i.e. the long-term loss of foraging opportunities as clearcuts regenerate into unsuitable habitat. 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.</p>
<p>Public Recreation</p>	
<p>James Taggart</p>	<p>As the father of a four-year-old, and one-year-old. I am concerned about the continue logging the forest of Southeast Alaska. Forests offer a myriad of benefits for fathers and their families. They provide a peaceful retreat from the hustle and bustle of daily life, offering a place for relaxation, rejuvenation, and quality time with loved ones. Forests also provide opportunities for adventure and exploration, fostering a sense of wonder and curiosity in children. They offer a natural playground for outdoor activities like hiking, camping, and wildlife spotting, promoting physical health and well-being. Additionally, forests teach valuable lessons about nature, conservation, and the importance of protecting the environment for future generations. Ultimately, forests provide a space for fathers to bond with their children, create lasting memories, and instill a love and respect for</p>

	nature that can be passed down through generations.
	Tourism
Larry Edwards, AK Rainforest Defenders	The FYSTS would place clearcuts near several Prince of Wales communities, along scenic marine byways and other areas of present or future economic value for recreation or tourism. As the Division’s 2020 Forest Action Plan recognizes, forested areas increase the attractiveness of communities to residents, businesses and tourists by providing cultural ecosystem services such as scenic values and outdoor recreation that benefit human health and promote healthy communities.... 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 in their natural state with little trace of human activity. They generally avoid the visual disturbance of industrial logging (such as logging trucks, bare ground or fallen trees). 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.
Tresham Gregg	Most of the residents of Southeast Alaska value wilderness recreational opportunities, wildlife preservation, clean air, and natural beauty. These are the elements that visitors value most as well, and they are the real economic drivers of our Alaskan economy especially here in SE Alaska.
	Roads
Nathan Newcomer, SEACC	The total miles of road to be constructed is at least 10.81 miles but road needs for several areas are not determined. The vast majority of old-growth will come from large sales on Prince of Wales Island, and will most likely be cut and processed by Viking Lumber, the largest operator in the region, because of Viking’s capacity to build roads (<i>State of Alaska Division of Forestry. 2022. Preliminary Best Interest Finding, Whale Pass Timber Sale SSE-1378-K, pp. 23-24</i>).
Tresham Gregg	The cost of road building and other infrastructures usually cost taxpayers/government more than the expected revenue generated.

Notes:

1. Several commenters produced footnotes referencing quotes or basis of comment (SEACC, Knight, Defenders). Footnotes were not extracted for the summary of the comment recorded in this document.
2. Original comments are available upon written request.