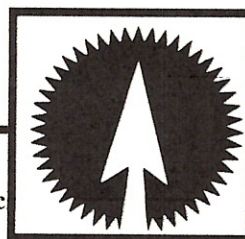


Alaska Forest Association



Ketc

111 Stedman Street

Phone: 907-225-6114

Fax: 907-225-5920

Via Fax Submission

October 14, 2020

Thorne Bay Ranger District
ATTN: Twin Mountain II Timber Sale
PO Box 19001
Thorne, Bay AK 99919

RE: Public Comment re: Twin Mountain II Timber Notice of Intent

To Whom It May Concern,

This letter provides public comment from the Alaska Forest Association (AFA) to the United States Forest Service (USFS), Region 10, Thorne Bay Ranger District, regarding the Twin Mountain II Timber Sale (Twin Mountain) in the Tongass National Forest (Tongass).

The AFA supports the USFS' intent to develop the ~42 MMBF sale in the Tongass for both the survival of the industry and the economic benefit to the region. The timber industry in the Tongass is dependent on the availability of viable timber sales by the USFS to sustain industry operations and support local jobs in southeast Alaska. The Twin Mountain sale also provides secondary and tertiary benefits to the residents of Prince of Wales (POW) Island and the southeast Alaska economy in the form of infrastructure jobs, transportation enhancement, and access to a variety of resources and activities.

The AFA encourages the USFS to consider both the economics and timing of the project in the development of the Draft Environmental Impact Study (EIS). The results of an analysis of the original unit pool and the USFS Base Year 2019 Quarter update appraisal data resulted in a \$350,000 deficit for the sale. Now that Twin Mountain will have a new unit pool, not tied to the Prince of Wales Landscape Level Analysis (POWLLA), the deficit units make up most of the current sale volume. To ensure the economic viability of the sale AFA requests that the USFS consider making exceptions in the development of the Draft EIS for more than just the viewshed components of the sale.

The AFA implores the USFS to ensure the project follows the proposed schedule. The USFS track record on previous projects, and a pattern of delayed actions and sales is concerning. The timber industry cannot sustain the typical 12-24 month delays that have become commonplace on USFS sales.

Thank you for the opportunity to comment on the Twin Mountain sale. Please contact me at (907) 225-6114 or afa@akforest.org with any questions.

Sincerely,


Tessa Axelson
Executive Director