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May 12, 2025

Barbara Miranda
Acting Forest Supervisor (Objections Reviewing Officer)
Tongass National Forest
Federal Building, 648 Mission Street, Suite No. 110,
Ketchikan, Alaska 99901-6591

Re: OBJECTIONS Pursuant to 36 C.F.R. § 218.8 to Thorne Bay Basin Integrated Resource Management Project #62854 Draft Decision Notice and Finding of No Significant Impact, Tongass National Forest

To the Objections Reviewing Officer:

The Center for Biological Diversity submits these timely objections to the U.S. Forest Service's environmental assessment (EA), finding of no significant impact, and draft decision notice (collectively, EA/FONSI and Draft DN), for the Thorne Bay Basin Integrated Resource Management Project (Thorne Bay Project) on the Thorne Bay Ranger District of the Tongass National Forest.

OBJECTOR NAME AND ADDRESS: Per 36 C.F.R. § 218.8(d)(1), the Objector's name and address are:

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PROJECT OBJECTED TO: Pursuant to 36 C.F.R. § 218.8(d)(4), the Center for Biological Diversity objects to the Thorne Bay Basin Integrated Resource Management Project #62854. The responsible official is William Braun, Acting District Ranger and the project will be implemented on the Thorne Bay Ranger District of the Tongass National Forest.

TIMELINESS: These objections are timely filed. Notice of the Draft DN and FONSI was published in the Ketchikan Daily News (the newspaper of record) on March 28, 2025.

INTERESTS AND PARTICIPATION OF THE OBJECTOR:

The Center for Biological Diversity is a non-profit environmental organization with more than 1.7 million members and online activists who value wilderness, biodiversity, old growth forests, and the threatened and endangered species which occur on America's spectacular public lands and waters. Center members and supporters use and enjoy the Tongass National Forest and the lands of the Thorne Bay Project area for recreation, photography, nature study, and spiritual renewal.

The Center (with Alaska Rainforest Alliance) submitted timely comments on the scoping period for the Thorne Bay Project on October 17, 2023.

The Center remains concerned about the Thorne Bay Project, which includes plans to harvest 47.4 MMBF of timber across 2,299 acres (primarily through clearcut); construction or reconstruction of 21 miles of roads; and reopening of 36.5 miles of closed roads. Our major concerns remain adverse impacts to wildlife and fish; further loss of socio-economic benefits and ecosystem services; prevention of recovering second-growth forests from achieving old-growth characteristics; and the harvest of maturing forests that have high carbon sequestration potential and currently stored carbon will be logged.

ISSUES OF THE DECISION TO WHICH THE OBJECTION APPLIES:

The Center believes the EA/FONSI and Draft DN violates the law, including but not limited to:

- (1) Failure to consider an adequate range of alternatives.
- (2) Fails to take a hard look at impacts of the project.
- (3) Failure to prepare an EIS.

OBJECTION POINTS:

(1) Failure to Analyze a Range of Reasonable Alternatives

The EA describes the Thorne Bay Project's purpose as "to contribute to the economic and ecological health of Southeast Alaska's communities by protecting and restoring watershed conditions, improving terrestrial habitat conditions and connectivity, and providing a sustainable supply of young-growth timber volume to support local economies and the transition away from primarily old-growth harvest."¹ The EA identifies only two alternatives: (1) one proposed action, which includes 2,399 acres of clearcuts, mostly in large, contiguous units, and 46.4 MMBF of timber harvest; and (2) a no action alternative, which the EA states "does not meet the purpose and need or the SASS objective of an integrated land management approach to the Tongass."²

NEPA requires agencies to "study, develop, and describe" reasonable alternatives to a proposed action.³ The key criterion for determining whether a range of alternatives is reasonable "is

¹ EA/FONSI and Draft DN at 3.

² *Id.* at 23.

³ 42 U.S.C. § 4331.

whether an EIS's selection and discussion of alternatives fosters informed decisionmaking and informed public participation.”⁴ While an EA need not include every conceivable alternative, “[t]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate.”⁵ Where only an action alternative and no action alternative are analyzed and the no action alternative is not a reasonable alternative due to meeting none of the stated goals and purposes of a project, the agency has not satisfied NEPA's requirement to analyze a reasonable range of alternatives.⁶

Courts hold that an alternative may not be disregarded merely because it does not offer a complete solution to the problem.⁷ Even if additional alternatives would not fully achieve the project's purpose and need, NEPA “does not permit the agency to eliminate from discussion or consideration a whole range of alternatives, merely because they would achieve only some of the purposes of a multipurpose project.”⁸ If a different action alternative “would only partly meet the goals of the project, this may allow the decision maker to conclude that meeting part of the goal with less environmental impact may be worth the tradeoff with a preferred alternative that has greater environmental impact.”⁹ The courts also require that an agency adequately and explicitly explain in the EA any decision to eliminate an alternative from further study.¹⁰

In comments, the Center and others raised concerns with the proposed action's excessive timber volume, noting that the volume far exceeds local processing capacity, raising serious questions about whether it will meet desired conditions and objectives aimed at local processing and instead simply feed raw log export markets.

As an initial matter, the recently published Draft Timber Resources Assessment report for the ongoing Tongass forest plan revision process states that “the only established large-scale market for young-growth Tongass timber is export destinations.”¹¹ Despite this, the EA concludes with minimal analysis that “industry has both enough installed capacity to process the [Big Thorne Project] volume and plenty of room to ramp up production using existing capacity.”¹² The EA reaches this conclusion through a sawmill capacity assessment that does not provide a complete

⁴ *Westlands Water Dist. V. U.S. Dep't of Interior*, 376 F.3d 853, 872 (9th Cir. 2004) (citations omitted).

⁵ *Id.* at 868; *Vermont Yankee Nuclear Power Corp. v. NRDC*, 435 U.S. 519, 551 (1978).

⁶ *Klamath Siskiyou Wildlands Ctr. v. BLM*, No. 1:17-cv-00997-CL, 2019 U.S. Dist. LEXIS 66314, at *15 (D. Or. Feb. 20, 2019).

⁷ *Natural Resources Defense Council, Inc. v. Morton*, 458 F.2d 827, 836 (D.C. Cir. 1972).

⁸ *Town of Matthews v. U.S. Dep't. of Transp.*, 527 F. Supp. 1055 (W.D. N.C. 1981).

⁹ *North Buckhead Civic Ass'n v. Skinner*, 903 F.2d 1533, 1542 (11th Cir. 1990).

¹⁰ *See Wilderness Society v. Wisely*, 524 F. Supp. 2d 1285, 1309 (D. Colo. 2007) (holding EA for agency decision to offer oil and gas leases violated NEPA because it failed to discuss the reasons for eliminating a “no surface occupancy” alternative); *Ayers*, 873 F. Supp. at 468, 473.

¹¹ U.S. Forest Service, Draft Timber Resources Assessment, Tongass National Forest Plan Revision, 27 (Dec. 2024); *see also id.* at 33.

¹² Complaint at 9, *Alaska Forest Association et al. v. U.S. Dep't of Agriculture*, No. 3:25-cv-00046 (D. Alaska Mar. 6, 2025)

¹² EA/FONSI and Draft DN at 66.

picture. While the EA estimates the current annual capacity of surveyed sawmills as 118.7 MMBF per year, it also acknowledges that the actual production of surveyed sawmills is only 13% of that estimated capacity.¹³ The EA does not acknowledge nor analyze that many Prince of Wales Island mills do not meet their estimated annual capacity due to reasons other than timber supply. Other recent publication by the Forest Service recognize that numerous factors lead to this income, including “local employment availability, processing equipment limitations, [and] macroeconomic conditions...”¹⁴ The Draft Timber Resources Assessment notes the difficulty presented by workforce availability in particular, including challenges presented by few and costly housing opportunities.¹⁵

The EA also does not acknowledge nor analyze other potential sources of young-growth timber, other than the Thorne Bay Project, which would reduce mills’ capacity to process timber from the Big Thorne Project. Of the timber harvested across Southeast Alaska between 2011-2017, only 38% was harvested from the Tongass National Forest, whereas 48% was harvested from Alaska Native Corporation lands and 15% was harvested from state lands.¹⁶ Further, the EA does not differentiate between nor analyze mills’ capacity across different tree species. As outlined in the Center’s scoping comment, most Prince of Wales Island mills specialize in cedar, while the Big Thorne Project contemplates harvest of Sitka spruce and western hemlock. The timber industry seems to agree that there is little local interest or capacity, as Alaska Forest Association, Viking Lumber Company, and Alcan Timber Incorporated asserted in a recently filed complaint in federal court that “[t]here is only a ‘very small local market’ for young growth wood in the Tongass.”¹⁷

The comments of the Center and others urged the Forest Service to consider other alternatives, beyond the single action alternative and no action alternative, including (1) an alternative that does not include any clearcutting; (2) if commercial timber harvest is part of the project, an alternative that focuses on uneven-aged management; and (3) an alternative aimed narrowly at wildlife habitat enhancement with small openings only and no clearcuts. The Forest Service declined to analyze these alternatives in detail and failed to provide a compelling explanation for why it need not do so. It is simply not credible that the proposed action is the *only* reasonable way to manage the landscape while still achieving at least *some* of the ends identified in the agency’s purpose and need statement. If the Forest Service concludes that the proposed action is the only way, then the agency has apparently set its purpose and need statement too narrowly, violating NEPA.

¹³ *Id.*

¹⁴ Laberre, C et al., *Managing Second-growth Forests in Southeast Alaska for Deer Habitat, Timber, and Carbon Sequestration—Informing Multiobjective Forest Planning*, Pacific Northwest Research Station General Technical Report PNW-GTR-1027 (2025).

¹⁵ Draft Timber Resources Assessment at 25.

¹⁶ Huber-Stearns, H, et al, *Social and economic monitoring of the Tongass National Forest and Southeast Alaska communities*, Ecosystem workforce program Working Paper 98, Eugene, OR: University of Oregon (2020).

¹⁷ Complaint at 9, *Alaska Forest Association v. U.S. Dep’t of Agriculture*, No. 3:25-cv-00046 (D. Alaska Mar. 6, 2025) (citing U.S. Forest Service, *Trajectory to Young Growth on the Tongass National Forest* (Jan. 2013)).

Further, the Forest Service has an obligation under NFMA to consider alternatives to clearcutting for this project.¹⁸ The only applicable Forest Plan justifications for clearcutting are: (1) to achieve timber production objectives, (2) where there is a risk of infection or disease, or (3) high risk of windthrow.¹⁹ Timber production considerations do not justify clearcutting. The Forest Service has previously found that uneven-aged management (generally, 67% forest retention) would produce more timber from the area over time.²⁰ Windthrow risks do not justify clearcutting as the agency has also stated that uneven-aged management, whether group or single tree selection, creates a mostly wind firm retention level.²¹

There should also be an alternative that omits the timber emphasis units so that all timber extraction would be limited to small openings in the habitat emphasis units. It is better to pursue longer rotations with smaller openings so as to ensure retention of maturing forests to provide habitat features and meet the Forest Plan desired condition of progressing toward old-growth conditions.²² The agency's own research indicates habitat objectives in non-development LUDs for deer that combine snow interception with forage.²³ Given the condition of the project area landscape, the Forest Service needs to consider alternatives to clearcutting—and even to uneven-aged management—that aim solely at wildlife habitat objectives in the development LUDs. As noted in the agency's own reports, the relevant time frames for analysis should be “years to decades and multiple decades to centuries, respectively.”²⁴ Such an alternative would help to meet the need for long-term winter range.²⁵ Short-term benefits may pertain to understory vegetation and plant species diversity, while long-term objectives could be more rapid attainment of old-growth conditions.²⁶

Suggested Remedy: Develop alternatives with downscaled clearcut timber harvest and a focus on other multiple uses, including alternatives that: (1) eliminate any clearcutting; (2) if commercial timber take is part of the project, focus on primarily uneven-aged management; or (3) narrowly aim at wildlife habitat enhancement with small openings only and no clearcuts. If

¹⁸ See 16 U.S.C. § 1604(g)(3); *Avers v. Espy*, 873 F.Supp.455 (D. Colo. 1994); *Curry v. Forest Service*, 988 F.Supp. 541, 554 (W.D. Penn. 1997).

¹⁹ Forest Plan at 4-68.

²⁰ Central Tongass Project Draft Environmental Impact Statement at 3-230.

²¹ *Id.* at 3-233.

²² Wolf Technical Committee, *Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2, Management Bulletin R10-MB-822*, USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game (2017).

²³ Bennetson, B., *Tongass National Forest young-growth management guidelines for stands with a wildlife management objective, Ex. 3 of the Tongass Young-Growth Management Strategy*, USDA Forest Service, Tongass National Forest, Juneau, AK. (2020).

²⁴ *Id.*

²⁵ Hanley, T.A., *Relationships between Sitka black-tailed deer and their habitat* (Vol. 168), US Department of Agriculture, Forest Service, Pacific Northwest Forest and Range Experiment Station (1984).

²⁶ *Id.*

the Forest Service believes the Thorne Bay Project's purpose and need would not be fulfilled by these alternatives, then refine the purpose and need to not be so narrowly construed.

(2) The Forest Service has Failed to Take a Hard Look at Impacts of the Project

NEPA requires Forest Service to disclose and analyze environmental information and the consequences of federal action.²⁷ The failure to disclose and analyze requisite information indicates that the action agency failed to take a "hard look" at the environmental consequences of its actions.²⁸

The Thorne Bay Project EA fails to adequately analyze the effects of the project on wildlife species, including Queen Charlotte goshawk and Alexander Archipelago wolf. Regarding the goshawk, the EA recognizes that goshawks rarely use younger forests, instead preferring old growth. The EA also acknowledges that young-growth stands that will be harvested as part of the project are approaching an age where they will provide some benefits, i.e., foraging, occasional nesting, post fledgling areas, if adequate structure is developed.²⁹ Despite this acknowledgement, the EA entirely fails to analyze the effects to goshawks of this loss of potentially imminently beneficial habitat. Analysis of the effects of the project on Alexander Archipelago wolves, including dispersal and resulting increased mortality, are similarly lacking.³⁰

The EA fails to adequately analyze impacts to fish and wildlife. As noted in the NMFS essential fish habitat assessment for the project, "this project includes wide ranging direct, indirect, and cumulative adverse impacts to freshwater and marine EFH over a fifteen-year period."³¹ This characterization of the Thorne Bay Project directly conflicts with the EA, which states that the "project is not expected to adversely affect fish species, Essential Fish Habitat, aquatic ecosystems, water quality, or subsistence fisheries use."³² The EA also fails to adequately analyze road density impacts.

The EA also fails to analyze the impacts to marine ecosystems from the use of log transfer and storage facilities. Bark and wood debris that enter the marine environment at log transfer and storage facilities and line the nearshore environment have negative impacts on the marine environment. Benthic organisms in particular are affected, as are fish larvae. The Forest Service must analyze the physical, chemical, and biological effects from the use of log transfer and storage facilities as a result of the Thorne Bay Project.

²⁷ *Ctr. for Biological Diversity v. Salazar*, 695 F.3d 893, 916 (9th Cir. 2012) ("NEPA requires that we determine whether the agency took a 'hard look' at the likely effects of the proposed action.").

²⁸ *Klamath-Siskiyou Wildlands Ctr. v. Bur. of Land Mgmt.*, 387 F.3d 989 (9th Cir. 2004) (holding that requisite analysis must be in the environmental document).

²⁹ EA/FONSI and Draft DN at 87.

³⁰ See, e.g., Roeffler, G. et al., *Patterns of Wolf Dispersal Respond to Harvest Density across an Island Complex*, Animals, 14 (2024).

³¹ National Marine Fisheries Service, Letter Re: Thorne Bay Basin Integrated Resource Management Project; NMFS ECO Reference No. AKR-2025-01029 (May 5, 2025).

³² EA/FONSI and Draft DN at 28.

The EA lacks site-specific data or analysis on the effects of the Thorne Bay Project, including:

(a) Soil productivity:

- “If field-based [detrimental soil disturbance] estimates are consistent with Table 28, site-specific mitigation measures should be taken to ensure that the proposed action does not contribute to the impairment of soil productivity in these activity areas.” EA/FONSI and Draft DN at 76.
- “Planned temporary roads or landings may be moved either onto previously disturbed areas or outside of activity area boundaries. Finally, soil restoration measures may be used including road obliteration, scarification of disturbed areas, or topsoil replacement. Consult a soil scientist for site-specific recommendations.” *Id.*
- “[F]our new and existing temporary roads, identified in Appendix A, may intersect slopes greater than 67 percent and will require site-specific review. These roads are in units 6, 17, 30, and 81. Former landslide paths have similarly been taken out of harvest consideration until site-specific assessments can be completed.” *Id.*

(b) Habitat Emphasis Units:

- “Field review of stands prior to treatment could result in a determination that no treatment is needed if site conditions are trending towards or meeting desired conditions.” *Id.* at 7.

(c) General:

- “Based on past harvest experience it is expected that acreage will be further reduced by harvest feasibility, resource concerns, or timber merchantability as more site-specific resource information is obtained.” *Id.* at 8.

Further, the EA fails to provide adequate detail of its planned actions or analyze the effects of those possible actions under the Thorne Bay Project. “NEPA requires that environmental analysis be specific enough to ensure informed decision-making and meaningful public participation.”³³ Areas of the EA lacking sufficient detail include:

(a) Slash management:

- “Slash management and the opportunity for biomass utilization may occur across all treatment.” *Id.* at 9.
- “Slash may be managed post-harvest if needed to meet a management objective, such [as] reducing effects to soil quality or productivity and ensuring regeneration goals are met” *Id.*
- “Slash management may occur to facilitate animal movements or increase forage production and availability following methods described above under habitat emphasis units.” *Id.* at 10.

(b) Roads:

- “National Forest System roads which are currently stored may be opened for timber harvest.” *Id.* at 11.

(c) Aquatics and Essential Fish Habitat

³³ *Se. Alaska Conservation Council v. United States Forest Serv.*, 443 F. Supp. 3d 995, 1009 (D. Alaska 2020).

- “Evaluate steep side-slopes to determine if trees outside the 10-foot no-thin buffer would be prone to falling into the stream course. In this case, a no-thin buffer within the stream’s v-notch may be appropriate.” *Id.* at 15.

Finally, the EA fails to adequately analyze cumulative impacts from other reasonably foreseeable actions, including timber sales. While the Forest Service did prepare Appendix B, the cumulative effects, including to soil, sedimentation, fish, wildlife, and wildlife habitat, are not analyzed in the EA. The EA must incorporate analysis of effects of the proposed action, cumulatively with the effects of other proposed actions, including timber sales under the Big Thorne EIS and state timber sales on Prince of Wales Island.

Suggested Remedy: Revise the EA to: analyze effects of the Thorne Bay Project of Queen Charlotte goshawk and Alexander Archipelago wolves; make clear that the project will have wide ranging direct, indirect, and cumulative adverse impacts to freshwater and marine EFH over its fifteen-year span; analyze impacts of the road density planned for the project; analyze impacts to marine ecosystems of use of log transfer and storage facilities; gather site-specific information related to soils, habitat emphasis units, and harvest feasibility; clarify and analyze noncommittal statements plans slash management, road openings, and buffers to protect EFH; analyze cumulative effects of reasonably foreseeable actions, including the Big Thorne Project.

(3) Because the Thorne Bay Project is Likely to Have Significant Impacts, the Forest Service Must Prepare an EIS.

NEPA requires federal agencies to prepare a full environmental impact statement (EIS) before undertaking “major Federal actions significantly affecting the quality of the human environment.”³⁴ An agency must prepare an EIS if there are questions as to whether impacts may be significant.³⁵ The Ninth Circuit affirms this approach:

We have held that an EIS must be prepared if ‘substantial questions are raised as to whether a project ... may cause significant degradation to some human environmental factor.’ To trigger this requirement a ‘plaintiff need not show that significant effects will in fact occur,’ [but instead] raising ‘substantial questions whether a project may have a significant effect’ is sufficient.³⁶

Further, “[a] perfunctory description, or mere listing of mitigation measures, without supporting analytical data, is insufficient to support a finding of no significant impact.”³⁷

³⁴ 42 U.S.C. § 4331(C).

³⁵ *Idaho Sporting Cong. v. Thomas*, 137 F.3d 1146, 1149-50 (9th Cir. 1998) (citations omitted) (emphasis original).

³⁶ *Id.*; see also *Ocean Advocates v. U.S. Army Corps of Eng’rs*, 402 F.3d 846, 864-65 (9th Cir. 2005) (“To trigger this [EIS] requirement a plaintiff need not show that significant effects will in fact occur, but raising substantial questions whether a project may have a significant effect is sufficient.” (internal quotations, citations, and alterations omitted)).

³⁷ *National Parks & Conservation Ass’n v. Babbitt*, 241 F.3d 722, 734 (9th Cir. 2001).

The proposed action is a very large timber sale that the agency intends to clearcut, with the size of the project alone triggering questions about significant environmental effects.³⁸ The Thorne Bay Project is also precedential, as the first large-scale young-growth initiative under the Southeast Alaska Sustainability Strategy. The Tongass National Forest's own past practices for doing environmental analyses indicate the need to produce an EIS. The agency has consistently prepared an EIS for timber sales that entail industrial scale clearcutting of large amounts of timber. Between 1998 and 2006, the agency produced 10 timber project EAs for timber volumes that ranged from 2.6 to 8.7 MMBF, or an average volume of about 5.5 MMBF.³⁹ Conversely, between 1998 and 2011 the agency had, after producing an EIS, issued decisions on 19 timber sales. Compared to the proposed action, many of these projects removed similar or even considerably smaller amounts of forest.⁴⁰

The 9th Circuit has recognized that the possibility for significant impacts exist and an EIS must be prepared if a project is highly controversial, if the project involves highly uncertain or unknown risks, if cumulatively the project along with other actions will have significant impact on the environment.⁴¹ As outlined in more detail in the Center's comments, clearcutting is controversial and entails unknown long-term risks, including to recovering watersheds. The Thorne Bay Project would also set back succession, which poses long-term significant impacts to deer, Alexander Archipelago wolves, and Queen Charlotte goshawk, among other species. The significant effects to EFH by the project, recognized by NMFS, also justifies preparation of an EIS. The cumulative effects of the Thorne Bay Project, along with other reasonably foreseeable actions including under the Big Thorne Project and state timber sales, will result in cumulative impacts.

Suggested Remedy: Fully analyze the impacts of the Thorne Bay Project in a comprehensive EIS.

³⁸ 16 U.S.C. § 1604(g)(3)(E)(iv). NFMA's directives on clearcutting mean that it is only acceptable in "exceptional circumstances" or, at a minimum, the Forest Service "must proceed cautiously in implementing an even-aged management alternative and only after a close examination of the effects that such management will have on other forest resources." *Sierra Club v. Thomas*, 105 F.3d 248 (6th Cir. 1997); *Sierra Club v. Espy*, 38 F.3d 792, 799 (5th Cir. 1994).

³⁹ These projects were the 1998 Nemo, Todahl and Twin Creek projects, the 2000 Doughnut and Polk projects, the 2004 Boundary and Shady projects, and the 2006 Goose Creek, Overlook and Soda Nick projects.

⁴⁰ These projects include the 1998 Crane and Rowan Mountain and Crystal Creek Projects (24 and 13 MMBF); the 1999 Canal Hoya Project (13 MMBF); the 2000 Kuakan, Luck Lake and Skipping Cow Projects (12, 12.9 and 19 MMBF); the 2001 – 2003 Woodpecker Project (16.3 MMBF); the 2003 Finger Mountain, Licking Creek and Madan Projects (21.4, 17 and 27 MMBF); the 2004 Three Mile Project (19.5 MMBF); the 2005 Couverden and Emerald Bay Projects (23 and 16.4 MMBF); the 2006 Scott Peak and Tuxekan Projects (8.3 and 18.3 MMBF); the 2007 Scratchings and Traitors Cove Projects (21 and 17.1 MMBF); the 2008 Baht Project (4.3 MMBF) and the 2011 Central Kupreanof Project (26.3 MMBF).

⁴¹ See, e.g., *Sierra Club v. United States Forest Serv.*, 843 F.2d 1190, 1193 (9th Cir. 1988).

CONCLUSION:

The Center appreciates your consideration of the information and concerns addressed in this objection. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Marlee Goska". The signature is fluid and cursive, with the first name "Marlee" and last name "Goska" clearly distinguishable.

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