

June 2026. Dr. Jackie Canterbury, 1640 E. Marrowstone Rd., Nordland Washington, 98358

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Valeria Cancino, Project Lead

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Re: Comments on the Twin Mountain II Timber Sale Draft Environmental Impact Statement (DEIS), Thorne Bay Ranger District, Tongass National Forest, Prince of Wales Island, Alaska

Dear Ms. Cancino and Responsible Official Forest Supervisor Monique Nelson:

I. OVERVIEW AND STANDING

I submit these comments based on both professional experience and firsthand knowledge of Prince of Wales Island. I lived in Coffman Cove during the height of industrial logging and personally observed extensive timber harvest activities, including those in the Staney Creek watershed.

My experience in Southeast Alaska spans decades. I worked as a Wildlife Biologist for the Ketchikan Ranger District in the 1980s and 90s and later for Misty Fjords National Monument from 2000 to 2006. Throughout my career, I have been directly involved in forest, wildlife, and watershed conservation issues across the Tongass National Forest. I have also been a Board Member of Forest Service Employees for Environmental Ethics (FSEEE) for many years, promoting environmental ethics and responsible stewardship of our national forests. I have incorporated some FSEEE comments into this letter and made additional points of my own.

I was actively involved in efforts that strengthened protections for fish habitat, including advocating for wider buffers along salmon-bearing streams and the Tongass Timber Reform Act. These experiences provided me with a detailed understanding of the ecological consequences of old-growth logging, road construction, and watershed fragmentation.

Having witnessed the transformation of Prince of Wales Island over time, I have a deep understanding of the cumulative impacts of industrial timber harvest on old-growth forests, salmon watersheds, and wildlife habitat. In my professional judgment, any proposed logging in the remaining low-elevation old-growth forests of the Staney Creek watershed must be evaluated within the context of the extensive historical logging that has already occurred on

Prince of Wales Island and the increasingly limited amount of high-volume, productive old-growth forest that remains.

I submit these comments on the Twin Mountain II Timber Sale Draft Environmental Impact Statement (DEIS) published April 2026. I urge the Responsible Official to select Alternative 1, the No Action Alternative, or in the alternative, to substantially revise the project to eliminate all new road construction, reduce harvest acreage to the minimum necessary, and strengthen protections for old-growth wildlife habitat, salmon-bearing streams, and subsistence resources. The DEIS as currently written fails to satisfy applicable legal standards and conflicts with the agency's own Forest Plan, monitoring findings, and best available science.

The Twin Mountain II project proposes to harvest approximately 26.8 million board feet (MMBF) of old-growth timber from 1,655 acres in the Staney and Red Bay areas on the Thorne Bay Ranger District, Prince of Wales Island. The proposed action includes 0.9 mile of new National Forest System (NFS) road construction, 12.4 miles of new temporary road construction, and activation of approximately 33 miles of currently closed NFS roads. This project implicates some of the most sensitive and already-diminished ecosystems on the Tongass National Forest.

Prince of Wales Island has already experienced one of the most intensive old-growth logging histories in North America. For more than 70 years, it has been the center of industrial-scale timber extraction in the Tongass National Forest. Hundreds of miles of logging roads have been constructed, vast areas of productive old-growth Sitka spruce, western hemlock, and western redcedar have been clear-cut, and watersheds across the island have been fragmented by road building and timber harvest.

The central issue in the Twin Mountain II Timber Sale is the cumulative impact on the remaining low-elevation old-growth forests of the Staney Creek watershed. These forests are among the most productive and ecologically valuable in the Tongass.

One of the ways the Forest Service classifies old-growth stands is by timber volume. Volume Class 7 represents the largest, most productive old-growth forests. Across the entire Tongass, Volume Class 7 comprises only about 82,000 acres—roughly 0.5% of the forest—and more than half of these stands have already been logged. How many acres of Volume Class 7 old growth remain within the Twin Mountain II project area, and how many acres would be affected by this sale? You must disclose this continued high grading in your FEIS and explain how it reconciles with your legal obligation not to substantially and permanently impair the productivity of the land.

Prince of Wales Island was the epicenter of industrial logging during the pulp era. Harvest activities focused on the very forests that provide the highest ecological value today: low-elevation valley bottoms and large-tree spruce-hemlock stands. As a result, many of the island's largest and most productive old-growth forests were cut first. Conservation analyses estimate that 90% or more of Prince of Wales Island's largest old-growth stands have already been harvested.

Given this history, any additional loss of remaining large-tree old growth in the Staney Creek watershed cannot be viewed in isolation. The Forest Service must evaluate this project within the context of decades of cumulative habitat loss, watershed fragmentation, and the continuing decline of the rarest and most productive old-growth forest types in the Tongass.

II. LEGAL AND REGULATORY FRAMEWORK

A. National Environmental Policy Act (NEPA)

NEPA requires that an agency take a ‘hard look’ at the environmental consequences of its proposed action and reasonable alternatives. 42 U.S.C. § 4332(2)(C); *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332 (1989). The DEIS must disclose all significant environmental effects—direct, indirect, and cumulative—in sufficient detail to permit informed public comment and decision-making

B. National Forest Management Act (NFMA)

NFMA requires the Forest Service to manage national forests to achieve and maintain the diversity of plant and animal communities. 16 U.S.C. § 1604(g)(3)(B). It directs the agency to ensure that timber harvesting does not ‘substantially and permanently impair the productivity of the land,’ and that management is consistent with the applicable Forest Plan. 16 U.S.C. §§ 1604(e), (g)(3)(C). Project-level decisions must be consistent with the Forest Plan. 36 C.F.R. § 219.15.

C. Endangered Species Act (ESA)

Section 7 of the ESA, 16 U.S.C. § 1536, requires the Forest Service to consult with the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service (NMFS) when any agency action may affect species listed as threatened or endangered or their designated critical habitat. The project area supports essential fish habitat for five Pacific salmon species subject to ESA protections. The Queen Charlotte goshawk (*Accipiter gentilis laingi*) was petitioned for listing under the ESA; USFWS acknowledged in a 12-month finding that continued large-scale old-growth removal in the Tongass would result in significant adverse effects to goshawks. Alexander Archipelago wolves (*Canis lupus ligoni*) have been evaluated for potential listing. The consultation record and biological assessment/evaluation in the project file must fully address cumulative effects to these sensitive species.

III. Environmental Effects

A . Old-Growth Habitat Loss

The remaining old-growth forests on Prince of Wales Island provide essential habitat for numerous species, including the Alexander Archipelago wolf, Sitka black-tailed deer, and Queen Charlotte goshawk. These forests contain structural characteristics that cannot be replaced for

centuries, including large living trees, standing dead trees, downed woody debris, complex canopy layers, and diverse understory communities.

Continued logging of old-growth stands further fragments habitat and diminishes the ecological integrity of the landscape. The Forest Service should prioritize management of second-growth forests rather than continued harvest of remaining old-growth ecosystems.

B. Impacts to Salmon Watersheds

Prince of Wales Island contains numerous streams that support Pacific salmon. Logging and associated road construction can increase sediment delivery, alter hydrologic processes, and reduce watershed resilience. Healthy salmon streams are essential to wildlife, subsistence users, Tribal communities, commercial fisheries, and recreational fisheries.

The Environmental Impact Statement should fully evaluate cumulative watershed effects and demonstrate that salmon habitat will be protected over the life of the project.

C. Climate and Carbon Storage

The Tongass is globally significant for carbon storage. Old-growth forests continue to store substantial amounts of carbon while providing climate resilience, biodiversity conservation, and watershed protection. Logging mature and old-growth stands reduces long-term carbon storage and can undermine regional climate mitigation goals.

The Forest Service should provide a thorough analysis of greenhouse gas emissions, carbon loss, and long-term climate impacts associated with the proposed harvest.

D. Queen Charlotte Goshawk

The Queen Charlotte goshawk (*Accipiter gentilis laingi*) is a Forest Service Region 10 sensitive species and has been subject to ESA listing petitions. This species has a very large home range in southeast Alaska. The DEIS fails to disclose whether any goshawk post-fledging areas overlap with proposed harvest units, or whether cumulative loss of foraging habitat across the landscape is consistent with maintaining viable goshawk populations. I would suggest that the cumulative effects of FS logging on Prince of Whales continues to place this bird in peril.

Goshawk nesting territories are concentrated in productive old-growth forests and nesting success is associated with mature forest characteristics. Because these habitat features take centuries to develop, replacement of lost nesting habitat is not possible on management timescales of decades.

E. Impacts to Alexander Archipelago wolf populations

All project area WAAs already exceed Forest Plan road density thresholds for wolf protection. Current road densities in all WAAs range from 1.4 to 2.1 miles per square mile—well above the Forest Plan's 0.7 to 1.0 mile/square mile guideline and above the 1.5 miles/square mile threshold identified by Person and Russell (2008).

Person et al. (1996) documented that wolf harvest increased twofold when road density exceeded 1.0 mile per square mile and may contribute to unsustainable wolf mortality. The DEIS itself acknowledges that ‘the project area WAAs may be at risk of overharvest (both unsustainable and pack depletion) in the future even with scheduled road closures’ (USDA Forest Service, 2026, p. 91).

Building roads in already-saturated WAAs maintains elevated hunter and trapper access, perpetuating unsustainable wolf mortality risk. I was at the table when Persons first presented his data on wolf mortality on Prince of Wales due to logging and hunter access. I am perplexed that this is still going on and that this species is not better protected by the USFS. Timber harvest should not take precedent over wildlife conservation.

The USFWS, in its 12-month not-warranted finding for the Alexander Archipelago wolf (U.S. Fish and Wildlife Service, 2023), identified timber harvest, road development, wolf harvest, and inbreeding as key threats to the species. Timber harvest remains the greatest threat in terms of road building which provides access and of course habitat.

Conservation science strongly recommends maintaining large blocks of high-quality deer habitat including medium and large-tree old growth at lower elevations, and prohibiting or minimizing road access to prevent overharvest of local wolf populations (Schoen & Person, 2007). The Twin Mountain II proposed action does the opposite: it reduces old-growth habitat in WAAs with elevated road densities that already pose a mortality risk to wolves.

F. Cumulative Effects

Prince of Wales Island has experienced decades of industrial-scale logging. The environmental review should not consider Twin Mountain II in isolation. Rather, it should analyze cumulative impacts from past, present, and reasonably foreseeable timber sales, road construction, and habitat alteration across the island.

G. Adequate site-specific Analysis

The agency has failed to provide adequate site-specific analysis of logging impacts, particularly regarding old-growth habitat. The Tongass National Forest is one of the world's largest remaining temperate rainforests. The remaining old-growth forests of Prince of Wales Island are ecologically irreplaceable, providing critical wildlife habitat and ecosystem functions, and should be managed with exceptional care and stewardship for the benefit of future generations of people, wildlife and fish.

H. Old-Growth Reserve System

The Forest Plan establishes a network of Old Growth Reserves (OGRs) to conserve old-growth-dependent species. Multiple OGRs abut or are adjacent to the project area, including the Honker Divide Large OGR complex (200,000+ acres) and the Mt. Calder/Mt. Holbrook large OGR (USDA Forest Service, 2026, p. 90). The value of these reserves to wildlife depends upon the matrix of managed forest that surrounds and connects them. Clearcut harvest immediately adjacent to OGR boundaries degrades the reserves’ ecological function by fragmenting habitat,

increasing predation risk, and eliminating movement corridors. The DEIS does not disclose the proximity of individual harvest units to OGR boundaries or the cumulative effect of Alternative 2 harvest on the functional integrity of adjacent OGRs. This information is material to the Forest Plan's biodiversity and connectivity standards and must be provided in the FEIS.

CONCLUSION: Given past USFS history and mistakes, any additional loss of remaining old growth in the Staney Creek watershed cannot be viewed in isolation. The Forest Service must evaluate this project within the context of decades of cumulative habitat loss, watershed fragmentation, and the continuing decline of the rarest and most productive old-growth forest types in the Tongass. It must also consider the decades of reduction in habitat for deer, wolves, goshawks, salmon, and all the other species that depend upon one of the last remaining old growth forests in the world.

The Tongass National Forest has become the '**end of the road**' for many of these species. There are few remaining places where large, productive old-growth ecosystems persist at a meaningful scale. The forests that remain in Staney Creek are not simply another timber stand; they are part of a globally significant ecosystem that has already experienced extensive loss.

And we should not forget that the Tongass belongs to the American people. Its management carries a responsibility to us all.

Thank you for considering this strong objection to your decision.

Sincerely,

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REFERENCES

Legal Authorities

National Environmental Policy Act, 42 U.S.C. §§ 4321–4370m

National Forest Management Act, 16 U.S.C. §§ 1600–1614

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