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Organization: Southeast Alaska Subsistence Regional Advisory Council

Title: Chairman

Comments: RE: Subsistence Regional Advisory Council comments on Twin Mountain II Timber Sale

Dear Mr. Stewart, Ms. Muldonado, and Planning Staff:

The Southeast Alaska Subsistence Regional Advisory Council would like to express its concern for the impacts that the proposed Twin Mountain II Timber Sale (Twin Mountain Sale) may have on subsistence uses throughout the Tongass National Forest on Prince of Wales Island (Island). This Council would like to offer comments as proposed changes could substantially affect the use of public lands and therefore significantly restrict subsistence uses.

The Council's charter establishes its authority to initiate, review and evaluate regulations, policies, management plans, and other matters related to subsistence within the Southeast Alaska region (ANILCA [sect]805). The Council represents the Federally qualified subsistence user and, for years, has consistently reviewed resource management actions that may impact subsistence resources critical to those users. This Council has valuable, relevant knowledge to the myriad of issues on Prince of Wales Island and it should have an opportunity to share that knowledge and provide a voice for the subsistence user.

Previously, I sent a letter to Mr. Stewart on October 13, 2020, informing him that this Council would likely discuss this issue at its next meeting, which was scheduled to take place less than a week after the scoping public comment period ended. I further advised that I thought the Council would choose to submit comments and asked that the comment period be extended so that the Council could participate in this public process. Mr. Stewart, by letter dated October 19, 2020, and through his engagement with the Council during its meeting on October 21, 2020, assured the Council that its comments are appreciated and welcomed even if submitted outside a designated comment period.

The Council discussed this issue at its meeting, held Oct 20-22, 2020, and would like to provide the following input on potential significant restrictions of subsistence uses and share information that could be used in exploring options to minimize adverse impacts upon subsistence uses and resources:

ANILCA [sect]805 Provides For Local & Regional Participation

Alaska National Interest Lands Conservation Act, Section 805, and the Secretaries of Interior and Agriculture, has recognized that regional advisory council members have specialized knowledge and should have a meaningful role in providing input on any significant restrictions of subsistence uses. As a FACA committee, its meetings provide a venue for gathering public record the Council feels that it is obligated to make that knowledge known through public comment on this matter.

At its bi-annual meetings, the Council, provides a public forum for discussion and recommendations for subsistence fish and wildlife management in the region. Through the years, the Council has heard scientific evidence from various sources regarding the impacts of timber harvests, the building of roads, and development, on natural food resources in the Southeast. The testimony the Council has heard from subsistence users, conveying local knowledge and technical ecological knowledge, along with the awareness of the council members themselves, has equipped this Council with a wealth of information for the region. The Council's constructive input regarding subsistence resources should be considered in the analyses conducted on any

environmental assessments of the Twin Mountain II Sale.

ANILCA [sect]810 Analysis is Required:

The Council would like to remind the Team that a [sect]810 analysis is required for this process;[middot]as Federal land use managers will need to make a finding of whether the proposed action will significantly restrict subsistence uses due to the land use action. Section 810 of ANILCA provides that

"the head of the Federal agency having primary jurisdiction over such lands[hellip]shall evaluate the effect of such use, occupancy, or disposition on subsistence uses and needs, the availability of other lands for the purposes sought to be achieved, and other alternatives which would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes."

The Council understands that all three criteria may occur, depending on the alternative selected, and there may be a reduction, restriction, or elimination of the use of some Federal public for the purposes of subsistence. Any disposition of Federal public lands from the Tongass National Forest from the Twin Mountain II Sale, being sourced, by subsistence users, may be found to be a significant restriction of subsistence uses and not consistent with sound management principles for the utilization of these Federal public lands.

New Subsistence-Use Surveys are Needed

The Forest Service should perform new surveys to determine subsistence uses and needs for Southeast communities and, specifically, those communities on the Island. It is noted that in recent draft and final Environmental Impact Statements (EIS) for projects on the Island, the documents advise that "significant restrictions to subsistence uses are likely;" however, there is no suitable baseline as to what 'subsistence uses and needs' are in these communities. The Forest Service has largely neglected to gather data needed to show current subsistence patterns beyond baseline studies that are now 20 to 30 years old. A finding of significant restriction on subsistence uses would need to specifically show what uses were affected and where these restrictions would take place. The Council believes there is a reliance on dated information and there is a vital need to identify the current subsistence uses and needs in these communities.

Examination of Climate Change Impacts

The Forest Service should complete a thorough, current examination of climate change impacts of this sale; specifically, capturing how much carbon sequestration would be lost with this effort to cut old growth forest. Healthy old-growth forests are incredibly valuable. They are beneficial for salmon streams and are effective for absorption of carbon dioxide. The positive influence of old growth forest areas should not be dismissed and any potential changes of old growth forests should be considered carefully. The Forest Service should perform an analysis of carbon capacity before industrial logging; carbon capacity at present after industrial logging; and a carbon capacity projection, to gather current data. The Forest Service should also explore the opportunity for carbon credits. Recent sales of carbon credits by Sealaska Corporation provide a metric for the economic value of the carbon stored in the Tongass National Forest.

Habitat Analysis

The Forest Service should conduct specific analyses on:

DEER HABITAT: Determine how deer habitat will be impacted by this timber sale. The Forest Service should conduct an investigation on the effectiveness of the tree thinning program and the result that this program has had on the deer habitat. There has been a substantial amount of tree thinning and although it is stated by the agency that this thinning benefits wildlife, there is good evidence and ongoing research that shows that the

habitat quality of second growth stands are not as beneficial as expected. Second growth acres are tabulated and put into a category of "good deer habitat;" however, newer information should be obtained from a more recent analysis of the effect of tree thinning on deer habitat.

WOLF HABITAT: Determine how wolf habitat will be impacted by this timber sale. Wolves are a main predator of deer on the Island and the impacts to deer habitat will result in impacts to the wolf population. The Forest Service should concurrently perform an analysis on wolf habitat when gathering current data on deer habitat.

Karst Analysis and Water Quality

The Forest Service should conduct a comprehensive analysis on the effect that timber harvests have on karst landscapes. Complete effects should be considered. An in-depth investigation should be performed on the entire watershed of the area being affected due to timber harvest on those landscapes and not just those areas that are considered as high vulnerability. These analysis should not only consider the quality of water in the streams used by fish and wildlife, but the underground water sources as well.

The analysis should address the need for consistent buffer zone sizes on state, private, or Federally[shy]owned lands. Any new findings from this analysis should be carefully considered holistically across the entire watershed.

Purpose and Need Analysis

The Forest Service should provide a clear and adequate Purpose and Need analysis. This analysis should address whether, under given market conditions, it is still necessary to harvest old growth trees at the rate intended. Export markets for timber have declined and much of the ongoing harvest of old growth timber occurs on state or private land. There is a crucial need to investigate poor market conditions of exporting old growth timber. Further, the possibility of local mills purchasing material and making it economically viable should be explored as this option may make it unnecessary to harvest timber on National Forest lands.

Cumulative Impacts

The Council understands that new NEPA regulations have been passed, both nationwide and Forest Service agency-wide. The Forest Service should evaluate cumulative effects under the same National Environmental Protection Act (NEPA) criteria as was in place during the analyses of the Prince of Wales Landscape Level Analysis.

The Council appreciates the opportunity to convey its concerns about the effect of the proposed Twin Mountain II Timber Sale on the subsistence food and resources that many of our Southeast Alaska families depend upon.