

Data Submitted (UTC 11): 9/17/2021 9:31:22 PM

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Organization: Southeast Alaska Conservation Council

Title: Environmental Policy Analyst

Comments: RE: Upper Falls Young-Growth Timber Sale Project

ID Team Leader Case,

Thank you for the opportunity to comment on this project. Southeast Alaska Conservation Council (SEACC) is a nonprofit environmental organization dedicated to safeguarding the integrity of Southeast Alaska's unsurpassed natural environment while providing for balanced, sustainable use of our region's resources. SEACC offers the following comments on the proposed young-growth timber sale on the Petersburg Ranger District at Upper Falls.

SEACC supports the Forest Service's efforts to continue advancing the Tongass National Forest's transition away from old-growth logging, and we acknowledge that selective, responsible and conservative young growth timber harvest is a part of how National Forest managers will effectively complete this transition.

The Upper Falls sale is small; 1 MMBF in two small units on approximately 43 acres. It appears to be offered with local small operators in mind. We believe this kind of sale will encourage the further development of the young-growth market locally. While we do not favor replacing large scale old-growth logging with large-scale young growth logging, SEACC generally supports the concept of using young-growth timber from the Tongass in order to produce wood products that are sold locally and regionally. This type of small sale supports this effort by making it more appealing for small local operators.

We request that the Forest Service consider if/how other forms of harvest, besides even-aged (clear-cut) logging, could effectively be used in sales such as this one, now and going forward. If these small sales could be packaged with wildlife habitat concerns and management goals in mind, more Forest goals could be accomplished when offering sales like Upper Falls.

Given the fresh direction for management of the Tongass, SEACC sees this kind of locally targeted, small-scale young-growth harvest as a noteworthy step in the right direction for the future of the Tongass.

Thank you for the opportunity to comment and work with you going forward on this and other Forest management projects.

Sincerely,

Katie Rooks

Environmental Policy Analyst