Data Submitted (UTC 11): 5/10/2025 12:35:33 AM
First name: Robert
Last name: Fithian
Organization: PRINCE OF WALES CHAMBER OF COMMERCE
Title: President
Comments: Prince of Wales Chamber of Commerce
PO Box 490 * Klawock, AK 99925-0490
Phone: (907) 755-2626 www.princeofwalescoc.org
Email: info@princeofwalescoc.org

May 9, 2025
Barbara Miranda
Acting Forest Supervisor (Objection Reviewing Officer)
Tongass National Forest, Federal Building
648 Mission Street, Suite No. 110
Ketchikan, Alaska 99901-6591

Dear Ms. Miranda,
Please find the following comments regarding the Thorne Bay Basin Integrated Resource Management Project Environmental Assessment (EA).
These comments are submitted by the Prince of Wales Island Chamber of Commerce (COC) which represents over 210 local business members. This chamber is "Dedicated to Wise Use and Development of Resources and Providing the Public with Information about Prince of Wales Island. The Chamber is made up of businesses and individuals who support "Sustained Development for the Benefit of all the Island's Communities and its People". Our motto is "Progress through Unity".
It is our hope that these comments and recommendations will help steer you to what we believe should be common goals for the Tongass National Forest (TNF) within Prince of Wales Island (POW).
Please note that although POW represents an extraordinary ecological environment of natural resources that draws attention from the world, those of us who live here are dependent upon the prudent stewardship and sustainable use of these same incredible resources for our generational livelihoods. This we believe should be a common goal with the TNF. Within this vein of reality, as proposed, we believe that the EA falls short in numerous provisions or lack thereof.
POW's forest industry and related employment decline has affected our Island economy with a tremendous negative impact. Our existing highways, schools, health care, retail and utility infrastructure were built to accommodate and maintain a thriving and sustainable timber industry. We believe that you have the ability to partner with us to not just maintain a struggling industry but to help bring it back to life by utilizing the TNF in a viable and sustainable manner to do so.
The following are specific areas of concern which we request reconsideration and action be taken to ensure they are effectively addressed.

1. EA Timeframe:
The three plus years of time it took to produce this EA is not in keeping with what we believe the common goals should be for TNF and POW. Complete EIS's are typically conducted in a timelier timeframe.
It is important to comprehend that POW timber industry has been active for over seventy-five years. The industry as a whole provides for a significant percentage of year-round employment, and economic well-being for POW. Commercial operators cannot maintain viability or employment opportunity if TNF timber resources are locked up for years relative to an EA process. "Progress Through Unity" has to take the lead here and these EA's need to be conducted in a much timelier manner with a focus of having them completed within a single years' time.
2. The EA Does Not Provide Adequate Volume of Harvest for Industry Growth or Sustainability:
As proposed, the EA provides 45MMBF over a 15-year period or approximately 3MMBF per year. Current POW consumption is approximately 30MMBF.

The EA is basing future yield on current reduced consumption. We request that this be reconsidered and substantially increased.
Demand for value added products from young and medium growth resource is high.
There needs to be a substantial increase in resource availability within the EA that promotes venture capital investment for industry growth. This is vital to POW. The EA as proposed does not incorporate this important aspect.
3. There Needs to be a Viable Old Growth Component.
As proposed, the EA does not provide any old growth component of harvest opportunity.
One of our longest and largest employers here on POW which is vital to our culture and economy, is a lumber mill that requires old growth forest. They supply a unique and world-wide demand for specialty wood products needed for musical instrument manufacture.
There must be an old growth component provided within the EA that can allow for this entity to maintain a viable and sustainable future.
4. Barging Restrictions:
As written, there is substantial written address within the EA regarding restriction on utilizing log rafts for water transport of harvested resources and requirements for barge transport. These concerns are brought forward within the EA relative to marine mammal protection.
Please know that we have concerns with Federal Overreach and lack of viable infrastructure on this topic. We do not feel the TNF should be delving deep into NOAA or National Marine Fisheries oversight. These concerns should be handled by the entities harvesting and transporting resources.
Additionally, the infrastructure requirements for mandatory barging may require additional permitting, possible NEPA review, and will weigh heavily on viability.
5. Active Management is Critically Important to Help Maintain Healthy Deer Habitat and Human Access to Publicly Owned National Forest Lands:
Generational culture of life here on POW includes dependency on blacktail deer for food.
We request that the EA incorporate and maintain the pro-active concepts of forest and access management recommended by the Blacktail Deer Foundation and their "HERDS" stewardship initiative. The following are the "HERDS" concepts which we feel need to be included within the final EA:
A. Incorporate some combination of clear-cut harvest and wildlife habitat enhancing commercial thinning to create a mosaic across the landscape.
B. Timber harvest must have a habitat restoration emphasis which includes conventional harvest with habitat prescriptions, not just a silvicultural emphasis.
C. Incorporate habitat thinning prescriptions that remove the slash from the forest, possibly yarding whole trees to a landing where processing heads can access the logs.
D. Work with "HERDS" Group to prioritize where deer habitat work should be focused, where is it most important to create forage, connectivity, and winter range habitat.
E. Incorporate habitat thinning and treatments adjacent to open roads that will not only create forage for deer but make those deer accessible for hunting.
F. Incorporate opening existing closed and brushed in roads, making them resilient to the now more frequent atmospheric river events, and where possible, leaving these roads open for subsistence and hunting access and access for future continued habitat thinning.
G. Incorporate utilization of non-merchantable timber and slash for biomass and cord wood production. Biomass in the form of compressed wood products, i.e. biobricks, pressed logs, wood pellets, and/or wood chips.
H. Make small diameter non-merchantable logs available to the public for firewood.

Respectfully Submitted,

_____ Dated: May 9, 2025

Robert Fithian
President for the Prince of Wales Chamber of Commerce