

Data Submitted (UTC 11): 10/14/2020 10:22:47 PM

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Organization:

Title:

Comments: Dear Mr. Stewart,

I'm writing to provide a scoping comment for the U.S. Forest Service's Twin Mountain II Timber Sale Project (#58626). I'm also writing to formally request that the U.S. Forest Service hold public meetings and subsistence hearings during the scoping period.

I do not support the cutting of 3,000 acres of old-growth - especially considering contiguous high-volume old-growth forest in North Prince of Wales has been reduced by 93.8% between 1954 and 2004. I also do not support the building of approximately 49 miles of roads (3 new, 11 temporary, and 35 reconditioned) - especially considering Prince of Wales already has thousands of miles of roads.

This project is not in alignment with USDA Land and Resource Management Plan for Tongass National Forest 2016. The Forest Service has established the goal of transitioning to primarily new growth harvest by 2031. The volume of young growth harvest is to be considered first and at least provides 9.2MMBF annually in the first decade. This project does not help to achieve that goal set by the USDA Land and Management Plan, Chapter 5 Plan Content Developed Under the 2012 Planning Ruling O-TIM-02.

The stated purpose for this project says: "There is a need to provide a sustainable level of forest products to contribute to the economic sustainability of the region."

I question the sustainability of the Forest Service's assumption that there is a need to provide 3,000 acres of old-growth over the next 5-10 years for the economic sustainability of the region. Currently private industry is shipping approximately 2MMBF to international markets on a weekly basis.

Also given the scale and intensity of past logging on POW, and current AMHT logging operations, I'd like to suggest an alternative that develops long-term economic sustainability and opportunities to support ecological and community health:

- \* Focus on young growth timber sales
- \* Prioritize fully staffing and funding the numerous restoration and recreation projects identified by the POW LAT and now listed on the POW LLA out-year plan.
- \* Maintain and improve fish and wildlife habitat productivity to support subsistence, sport and commercial harvest of fish and game.
- \* Prevent the loss of understory in young-growth stands that are nearing stem exclusion to improve foraging production.
- \* Prioritize providing jobs for young-growth management in hunting areas with road access and deer browse so it combines employment, wildlife habitat and "hunt-ability."
- \* Provide current and future projections of economic data and analysis including an assessment and analysis of the regions economic contributions from the traditional, hunting, fishing, tourism, restoration and outdoor recreation economies.
- \* Improve ecological resilience, given expected impacts from climate change.

Specifically the EIS for Twin Mountain II needs to explore in detail:

- \* Red crossings generated due to new roads. Red crossing requiring re-engineering or maintenance.
- \* Affects road building and logging activities on watersheds and consequently salmon populations.
- \* Affects of increased human activity in this area on wildlife populations.
- \* Thorough study of how the Twin Mountain II old growth timber sale is consistent with internationally recognized

climate change adaptation and mitigation practices identified by the IPCC.

Thank you