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First name: Peter

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Organization:

Title:

Comments: To whom it may concern,

I'm writing to provide public comment on the U.S. Forest Service's South Revilla Integrated Resource Project (#53477) on the Ketchikan Misty Fjords Ranger District.

I strongly urge you to select Alternative 1 - No action.

As a life-long Ketchikan resident who values the resources that our temperate rain-forest provides, I am dismayed to see yet another proposed harvest of sensitive and increasingly rare types of old-growth forest.

I understand that the USFS requires a higher level of protection and environmental assessment for their timber sales than do other organizations such as native corporations or the Mental Health trust. Even so, when it is looked at in the big picture, [the entirety of the southern Tongass rainforest] - it is clear that the largest trees from the most valuable habitats are being and have been disproportionately targeted over the course of the last 100 years. Given the ongoing wide spread destruction of old-growth habitats throughout Prince of Wales island, Dall island, Long island and beyond, I cannot understand why this costly and potentially wasteful timber sale would be allowed to go forth.

Salmon fishermen are hurting already from dwindling salmon stocks. Wildfires are ravaging the entire west coast. Droughts are occurring with greater frequency and more severity throughout most of the western United States. In the context of all this, I believe it is absolutely essential that we protect and value the precious reserves of intact virgin rainforest that we have here in southern southeast Alaska. More now than ever, it is critical that the engines of the world's atmosphere stay in tact and that carbon sinks retain their carbon dioxide.

Aside from my feelings about the value of well preserved legacy ecosystems, this timber sale on its face appears to be a great financial waste. Already there is over 5 million dollars of "sunk" cost appropriated for this project with an estimated over 12 million dollars more required just for the construction and maintenance of new roads. Not only are these roads costly and unnecessary (southeast Alaskans do not need roads to utilize the forest), but to add insult to injury many of them will be closed off once the timber sale is completed! What an absolute waste of human ingenuity and effort. All at the expense of tax-payers nonetheless.

Of course the argument for alternative 2 is that it will provide jobs. By the USFS' own estimates there are roughly

190 total timber related jobs in ALL of southeast Alaska. This project would employ roughly 350 more people. It is my experience that the vast majority of these logging camps and timber sales are operated and conducted by people that are not Alaska residents. Regardless, those jobs would be highly temporary in nature and would not retain any sort of sustainable trajectory once the timber harvests are completed.

Furthermore I am alarmed at some of the specifics about the way that the FS has managed and intends to manage past and future timber sales. I am particularly concerned about the viability of saw-log grade Yellow Cedar. These timber sales are to be harvested on a rotation of between 70 and 120 years. In my own experience I have found that second growth areas almost never have any yellow cedar regrowth and that the age of even relatively small yellow cedars can exceed 300 years or more, sometimes even pushing 1000 years. Likewise, the largest and most valuable Sitka Spruce and Red Cedar that will no doubt be specifically targeted in this sale range in age from 250 to 800+ years. So we are to believe that these forests will replenish themselves with trees of a similar quality to that which we are logging in just 70 to 120 years? I am worried that the current harvest regimen that the USFS is using will result in a rather unimpressive, spindly forest dominated by Spruce and Hemlock that will be less biologically productive than old-growth and that will not allow for the formation of large sustained populations of Red and Yellow Cedar.

Furthermore I am disturbed by the fact that it assumed that 100% of the Yellow Cedar harvested will be exported straight to Asia with no value-added processing done by United States citizens. It does not sit well with me that the longest-lived, most rot-resistant wood that our forest provides gets shipped directly overseas.

To summarize the main points of contention I have:

- 1.) Millions of dollars of public money used for this project with no indication of profitability.
- 2.) Expensive roads being shut down again afterwards thereby utterly wasting money and effort at the expense of the environment.
- 3.) Timber harvesting schedules not accurately reflecting the time needed to regrow the targeted timber or the replacement rate of differing tree species.
- 4.) Potential for habitat destruction and negative impacts on Deer, Wolf, and Salmon populations. 5.) Minimal economic justification in comparison to how rare and valuable the targeted habitats are.
- 6.) There is a failure to consider the wider spreading implications of targeting old-growth temperate rainforest at a time when the globe is experiencing massive losses of habitats, massive releasing of greenhouse gases, widespread mass extinctions, and uncertainty about the national and international food security.

Sadly, I have that same old familiar sinking feeling that this timber sale will go through and it probably wont even be the more sensible Alternative 3. Most likely Alternative 2 will commence which will result in the highest levels of ecological disturbance. The Forest Service says that they value the input of the public but in all of the years of my short life, the forest never gets saved. It always gets logged. It is my hope that we, as a nation, and as a people, have the good sense to preserve the last of the best that there is left on plant Earth, lest we find ourselves in the same situation as the rest of the world. . . One can dream.

For what-it's-worth, I appreciate you taking the time to read my comments. Long live the Tongass.