

Data Submitted (UTC 11): 10/28/2020 8:00:00 AM

First name: Suzanne

Last name: Cohen

Organization:

Title:

Comments: Dear Mr. Walker,

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.

Please select the "no-action" alternative (Alternative 1) on the South Revilla Integrated Resource Project.

Currently, the Forest Service's proposed action (Alternative 2) would provide the most potential timber volume, and make the most high-volume acres available. Specifically, this would result in the cutting of 5,115 acres of old-growth. Additionally, the proposed action would build 14.4 miles of new roads and 34 miles of new temporary roads. 34.1 miles of currently closed roads would also receive maintenance, be used for log hauling, and closed again after logging operations cease.

I'm concerned with the impacts to wildlife management and subsistence resources due to the fact that the proposed alternative (Alternative 2) would eliminate 4,606 acres of productive old-growth, 402 acres of which (or 21.8%) are high volume deer winter range. I'm also concerned with the fact that wildlife travel corridors would be lost in at least 38 areas. I believe these impacts are in direct conflict with the intent of the project listed under the "Purpose and Need for Action" section of the DEIS which states: "sustain and improve aquatic and terrestrial habitat conditions that support commercial, sport, and subsistence resources." You can't hunt for sport or subsistence when wildlife habitat has been decimated.

I'm concerned about fish habit because of the potential impacts to flow patterns on 12 out of the 31 project area watersheds and the 114 additional stream crossings (32 crossing on Class I or Class II streams). Additionally, bark accumulation at Log Transfer Facilities will be highest under the currently proposed action (Alternative 2). Lastly, I'm concerned with the potential cumulative effects (tied to potential logging of Alaska Mental Health Trust Lands that are currently considered for exchange) near Gunsight Creek, North Saddle Lake, and Salt Lagoon. I believe these impacts are in direct conflict with the intent of the project listed under the "Purpose and Need for Action" section of the DEIS which states: "sustain and improve aquatic and terrestrial habitat conditions that support commercial, sport, and subsistence resources." You can't fish waters for sport or subsistence when the waters have been detrimentally affected.

I'm concerned that the proposed action (Alternative 2) would have the most effects on scenery resources. Specifically I'm concerned with the impacts to the Saddle Lakes Recreation Area, because the DEIS reports "the Forest visitors in these areas would be seeing landscapes where harvest activities dominate the scenery." I

believe these impacts are in direct conflict with the intent of the project listed under the "Purpose and Need for Action" section of the DEIS which states provide access to forest resources by commercial, subsistence, and recreation users." No one wants to recreate in a clearcut.

Finally, the Draft Environmental Impact Statement explains the Forest Service has already "sunk" \$5,109,625 into the project. The additional estimated cost to the Forest Service for the proposed action (Alternative 2) is \$5,127,000 for sale preparation and \$3,359,000 for sale administration. Considering that the law prevents the agency from offering timber sales that appraise negative, I'm doubtful this sale will find any buyers.

For these reasons, I urge you to reconsider the currently proposed action and instead select the no-action alternative (Alternative 1).