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Comments:

The size and scope of the proposed harvest levels in all alternatives of the Twin Mountain Timber Sale II DEIS is unacceptable. The NO ACTION alternative is the only acceptable alternative. In an area that has already been heavily logged, any of the alternatives would negatively affect wildlife, fisheries, forest productivity, and karst landscapes due to higher road density, less habitat connectivity, soil loss, sedimentation, or windthrow.

Past impacts to moderate and high vulnerability karst lands adjacent to the sale area should be considered when planning new logging units. Also, vulnerability ratings should be calculated based on vulnerability ratings of karst area rather than total acreage, which inaccurately reflects total karst area impacted. 88% of the forested karstlands in the proposed areas have already been harvested, more than is calculated in the DEIS. No high vulnerability karst should be included. No harvest at all should be allowed on karst, and adjacent non-carbonate areas should be assessed for impacts to watersheds containing karst. If logged at all, areas of low vulnerability and areas adjacent karst should only be logged by helicopter to minimize ground disturbance instead of partial suspension that disturbs soils and results in sedimentation into underlying cave systems and watersheds.

Assessment of the karst within this sale appears to be incomplete: None of the surveyed karstlands are low vulnerability, instead being moderate and high vulnerability, with some acreage apparently not assessed at all. All units still need to have karst buffers laid out to 2 tree lengths, and NO moderate or high vulnerability karst should be included in any sales. It is also not clear whether any cave entrances have been located during the karst surveys. If they have, the caves should be mapped before harvest to assure that standards and guidelines that require buffers above known cave passage are met. No additional roads should be built in an area already heavily roaded, due to additional potential for sedimentation into cave systems and fish streams/habitats. Again, karst inventory takes time and significant manpower and still appears to be incomplete within the proposed sale area. Possibly due to fiscal constraints, it appears that current inventory uses fewer people and a less systematic approach. While better GIS/GPS and LIDAR should help in locating features, systematic coverage with more people has always proved to provide more thorough mapping of proposed logging units. While GPS has gotten better since initial surveys, coverage is often still not great under the forest canopy. Surveys of the unit boundaries need to be conducted to be sure that there are not features that would be affected by harvest outside the unit but within prescribed buffers. Local cavers and volunteers can be very useful in conducting inventory, have extensive experience with the area, and should continue to be consulted.

While I assume and expect that USFS staff did and are continuing to do the best they can based on their own professional standards as well as what the LIDAR and GIS/GPS technology permits, it has unfortunately been the Grotto and cavers experiences in the past that cave and karst features have been missed during inventory and that the various EIS over the years have tended to be worded such that these documents seem to minimize the impacts on karst. As a group, the Alaskan cavers, especially, are wary of the USFS claiming all features will be protected during this process. More help on inventory is always needed, especially given the declines in federal funding for all federal programs and the extensive and complex areas these sales often comprise. I would strongly advise USFS to strive to continue to include local volunteers and cavers in inventory and planning processes as relating to management activities on karst. Cavers and USFS geologists and planners all want the same result, which is protection of significant karst and cave resources and wise use of the resources on the land. Cooperation in the planning process is necessary so that the USFS and cavers are on the same page and there is continued, open discussion about planned forest uses between all parties.

As a longtime caver, resident here in Southeast Alaska, and a previous and continuing member of the Glacier Grotto (the statewide chapter of the NSS), my suggestions are as follows:

USFS should choose the NO ACTION alternative. There are too many vulnerable resources within and underneath the remaining, unlogged old growth forest that could potentially be damaged. USFS should instead focus on second growth forests on non-karst lands. There are plenty of those areas available to support biomass or pressed wood products that don't require destroying critical and limited old growth forest habitat. It's also uneconomical for the USFS to continue to spend many times the recovered value of these sales using tax-payer dollars for the planning and implementation of these timber harvest projects that have failed, in recent years, to garner competitive bids from industry. If an action alternative other than NO ACTION were selected, all units with any karst features and landscapes should be excluded from any proposed timber units in this sale and/or the USFS should implement the federally mandated standards and guidelines for karst including creating buffers beyond just the minimum required 100 feet for karst features, especially where wind-throw is a problem. A two-tree height minimum is appropriate in these situations. Please involve the local caving groups to ensure buy-in and transparency in producing these proposed forest management activities. The result will be a better product.

Please choose the NO ACTION alternative. Thanks for the opportunity to comment.