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Organization:

Title:

Comments: I am filing this formal objection within the 45-day objection window that opened on October 16, 2026. I have legal standing to object under 36 CFR 218.5, having previously submitted timely and specific written comments regarding the Twin Mountain II Timber Sale Project on April 28, 2026. The issues raised below directly connect to my prior comments concerning the permanent loss of old-growth ecosystems, climate shielding, and the preservation of the Tongass temperate rainforest. These arguments incorporate critical environmental data affirmed in the Final Environmental Impact Statement (FEIS) and Draft Record of Decision (ROD).

STATEMENT OF OBJECTIONS & ISSUES

Issue 1: Failure to Protect a "Living Climate Shield" and Irreparable Loss of Ancient Old-Growth Ecosystems

* Specific Component of the Decision: The authorization to harvest up to 26.4 million board feet of old-growth timber across approximately 1,655 acres over a 15-year period in the Staney and Red Bay areas.

* Statement of Fact/Objection: As noted in my previous comments, the Tongass is the last great temperate rainforest in the United States and serves as a vital "living climate shield." The trees targeted for harvest are "hundreds of years old" and "will not grow back in our lifetimes, or our children's, or our grandchildren's." The FEIS fails to adequately weigh the permanent, multi-generational ecological destruction of clearcutting these ancient stands against short-term commercial yields, and underestimates the long-term loss of critical forest carbon storage capacity.

* Violation of Law/Policy: The decision to clearcut ancient, irreplaceable old-growth forests directly violates current federal executive priorities and agency directives aimed at conserving, restoring, and protecting mature and old-growth forests on federal lands for carbon sequestration and climate resilience.

Issue 2: Significant, Unmitigated Impacts to Subsistence Uses under ANILCA Section 810

* Specific Component of the Decision: Draft Record of Decision and FEIS findings regarding subsistence impacts in the Thorne Bay Ranger District.

* Statement of Fact/Objection: The Forest Service's own analysis under Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA) explicitly determines that the Twin Mountain II Timber Sale Project will significantly restrict and impact local subsistence deer hunting. Proceeding with a project that is documented to significantly harm rural food security and community stability-without exhausting all viable alternatives to protect these resources-violates federal mandates.

* Violation of Law/Policy: Proceeding with the project despite these documented harms violates the core intent and protective mandates of ANILCA Section 810 and the subsistence priority guidelines of the Tongass Land Management Plan.

Issue 3: Fragmentation of Wildlife Habitat and Watershed Degradation

* Specific Component of the Decision: Proposed construction, reconstruction, and maintenance of permanent and temporary logging roads across the project area.

* Statement of Fact/Objection: As stated in my previous remarks, this forest is a sanctuary for unique wildlife. Expanding road networks fragments the habitat of the Alexander Archipelago wolf, Sitka black-tailed deer, and local salmon-bearing watersheds. Increased road density correlates with higher wolf mortality and structural degradation of the old-growth canopy needed for winter deer survival.

* Violation of Law/Policy: The project fails to maintain the necessary habitat capabilities required to sustain viable

populations of management indicator species and sensitive wildlife, failing to meet the strict biodiversity mandates of the National Forest Management Act (NFMA).

RESOLUTION & REMEDIES REQUESTED

To resolve these severe deficiencies and comply with federal environmental and subsistence protections, I request the Reviewing Officer instruct the Responsible Official to implement the following remedies:

1. Select the "No Action" Alternative: As explicitly requested in my original submission, the Forest Service must choose the "no-action alternative" and "let these trees stand" to preserve this national treasure for the future.
2. Eliminate All Old-Growth Harvest Units: At a minimum, restructure the project to strictly forbid the harvest of old-growth timber, limiting any commercial actions exclusively to young-growth management.
3. Impose a Binding Road Density Cap: Remove all proposals for new permanent or temporary road construction in critical watersheds to safeguard salmon habitats and wildlife corridors.

Thank you for your review of this objection. I look forward to participating in the upcoming objection resolution meetings to discuss these critical flaws and work toward a solution that protects the communities and ecosystems of the Tongass National Forest.

Jennifer Bowen