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First name: Angeline

Last name: Zalben

Organization:

Title:

Comments: OBJECTION TO THE TWIN MOUNTAIN II TIMBER SALE DRAFT RECORD OF DECISION

Filed under 36 CFR part 218, subparts A and B

To: Jacqueline Buchanan, Acting Regional Forester, Alaska Region, Reviewing Officer, ATTN: Twin Mountain II Project, P.O. Box 21628, 709 West 9th Street, Juneau, AK 99802-1628

Date: October 24, 2026

1. OBJECTOR (36 CFR 218.8(d)(1) and (2))

Name: Angeline Zalben

Address: 5224 S Pine St, Tacoma, WA 98409

2. PROJECT (36 CFR 218.8(d)(4))

Project: Twin Mountain II Timber Sale (Forest Service project 301827): Final Environmental Impact Statement and draft Record of Decision, cover letters dated October 16, 2026

Responsible Official: Janelle Crocker, Acting Forest Supervisor, Tongass National Forest

National forest and ranger district: Tongass National Forest, Thorne Bay Ranger District, Prince of Wales Island, Alaska

Legal notice: Ketchikan Daily News, October 16, 2026, No. 18389

3. ELIGIBILITY AND THE CONNECTION TO COMMENTS (36 CFR 218.5, 218.8(c) and (d)(6))

I did not submit comments during the 2020 scoping or the April 24 to June 8, 2026 comment period on the Draft Environmental Impact Statement. I object on the basis given in the Forest Service's legal notice for this project (Ketchikan Daily News, October 16, 2026, No. 18389), which states: "Interested individuals or entities who have not previously commented may gain limited eligibility to object based on new information, but only for issues that arise based on new information where that information is truly new and was not available during the designated public comment opportunity."

Each issue below rests on new information that was not available during the designated comment opportunities: it first appears in the Final Environmental Impact Statement, the draft Record of Decision or its unit cards, released in October 2026, or arose after the comment period closed on June 8, 2026 (36 CFR 218.8(c)).

If this objection is set aside, I ask for the reasons in writing (36 CFR 218.10(b)) and that it be kept in the objection record.

4. ISSUES (36 CFR 218.8(d)(5))

Issue 1. The draft decision picks the biggest alternative for its volume

The part of the project I object to: The selection of Alternative 2 over Alternative 3 (Draft Record of Decision, page 6).

What changed after the comment period closed: The draft decision picks Alternative 2, the biggest option, because it "includes the highest volume of old-growth timber and is expected to support the most opportunities for local and regional jobs." The Final EIS says the smaller Alternative 3, 1,144 acres against 1,738, also "meets the purpose and need." Alternative 3 still includes Unit 346. (Draft Record of Decision, page 6; Final EIS,

Summary page iii and page 17)

How it conflicts with law, regulation or policy: The Final EIS says the Tongass Timber Reform Act directs the Forest Service to "seek to provide a supply of timber that meets market demand" (page 4). That direction doesn't call for the alternative with the most old-growth volume, and the Final EIS finds the smaller Alternative 3 meets the purpose and need. The decision should rest on the purpose and need and the Forest Plan, not on volume. Connection to comments: this issue rests on new information that arose after the designated comment opportunities closed (36 CFR 218.8(c)).

Issue 2. Seven units were added after the comment period

The part of the project I object to: The seven microsale units added to Alternatives 2 and 3 (Final EIS, page 15). What changed after the comment period closed: Seven new "microsale" units were added after comment, "not previously analyzed," about 98 acres in all. Separately, the Alternative 2 total went from 1,655 acres in the draft to 1,738. (Final EIS, page 15; the 1,655 acres is the Draft EIS's figure)

How it conflicts with law, regulation or policy: The 1978 regulations call for a supplemental analysis when "the agency makes substantial changes in the proposed action that are relevant to environmental concerns" (40 CFR 1502.9(c)(1)(i) (1978)). Units the Final EIS itself calls "not previously analyzed" were added after the public's last chance to comment.

Connection to comments: this issue rests on new information that arose after the designated comment opportunities closed (36 CFR 218.8(c)).

5. MY REASONS

Preserving old growth forest should be a top priority.

6. REMEDY REQUESTED

I ask the Reviewing Officer to instruct the Responsible Official not to sign the Twin Mountain II decision on this record, and to remove Unit 346 from the sale.

7. DOCUMENTS CITED

The pages cited above are in the Final Environmental Impact Statement, the draft Record of Decision and its Attachment 1 (unit cards), and the Draft Environmental Impact Statement for this project, or in laws, regulations and the Forest Plan, which 36 CFR 218.8(b) lets an objector cite without attaching them.

Angeline Zalben

October 24, 2026