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Comments: Greetings and thank you for the opportunity to comment on the Twin Mountain II Timber Sale project.

I am deeply concerned about some actions of the proposed Twin Mountain II Timber Sale project. My concern relates to proposed old growth timber harvest and what the consequences of this proposed harvest will be.

This sale, and others in the works, are being proposed without a clear objective of what condition our forest should be managed for. In my 46+ years of living in the Tongass I have come to understand that a harvested old growth forest cannot be [lsquo]managed[rsquo] back to old growth conditions by pre-commercial thinning or other management activities, in a span of decades. It will take numerous centuries for a harvested forest stand to return to old growth conditions.

Unfortunately, the timber industry of today is challenged by past unsustainable harvest as a result of the pulp mill era, 50 year contracts. Prince of Wales and islands directly to the west experienced the heaviest harvest of any area in the Tongass. The remaining old growth timber is extremely important as winter deer habitat, as so much of the low elevation old growth has been cut. The Staney watershed alone has more than 30,000 acres of young growth timber, much of which is in a stem excluded condition.

Before old growth sales of the scale being proposed are offered, the FS should develop a long-term management plan of how to return the harvested landscape to old growth condition. Then develop a logging plan, with broad public input, that will ensure that future harvested stands are managed to return to old growth conditions.

I have come to question management of young growth stands, as well. Many stands today are pre-commercial thinned, generally with two objectives in mind. Grow the stand to a commercial size, quicker and provide sunlight to the forest floor to help maintain understory forage for deer. Both are worthy objectives but I believe broader consideration of thinning objectives should be considered.

Thinning in high index stands leads to dead limbs that persist for decades, particularly on spruce, after a stand is thinned. This leads to a lower quality log that virtually all mill owners say they don[rsquo]t like and don[rsquo]t want to saw. I believe the FS should reconsider thinning in some stands and manage high index stands with a long-term objective of producing old growth quality timber for future timber harvest interests.

Young growth stands that are 50 to 100 years old are generally at or near full stem exclusion. There is little understory remaining. When these stands are eventually harvested again I am concerned that they will not regenerate in an old growth understory condition, as there are few residual plants left to reestablish an understory. The Unit 2 deer population has declined significantly so loss of understory habitat for deer only exacerbates the continued decline of deer in Unit 2.

It is my recommendation that the No Harvest option be adopted. Until a comprehensive timber management plan is in place that focuses heavily on returning our forest to old growth condition, we should not continue turning high value old growth forest, habitat and all, into unwanted, low value timber stands that have little habitat value for deer.

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