"Jim & Annie Mackovjak" <lituya@comcast.net>
11/17/2007 04:40 PM

To: <comments-alaska-tongass-hoonah@fs.fed.us>
cc:
Subject: Iyouktug

Forest Service planners:

JM-1 I have lived in Gustavus, on Icy Strait, for thirty-five years. I was very much opposed to the Forest Service's long-term pulp contracts, and was very pleased when they were terminated. The Hoonah Ranger District paid a steep price to help keep APC in timber. Joe Chiorella, the former Hoonah district ranger, told me probably fifteen years ago that the best timber on the Hoonah district was gone. In his words, the "heart of the watermelon was gone," and the Forest Service was working "close to the rind." It was also working off the public's pocketbook: witness the dismal economics of the Hoonah district's Humpback-Gallagher timber sale.

JM-2 The environmental damage caused by previous logging on the Hoonah district--especially in terms of lost deer habitat--is considerable and cumulative, particularly given the extensive clearcut logging on adjacent Sealaska and the Huna Totem Corporation lands. With the high cost of groceries and traditional dependence on subsistence, preserving productive deer habitat is of paramount importance, and should be given priority over logging.

JM-3 I am very opposed to the Forest Service's current proposal to log an additional sixty million board feet of timber in the Hoonah Ranger District. It will just be another environmentally costly and money-losing project.

JM-4 It concerns me greatly that the Forest Service now has a structural policy to export unprocessed logs from the Tongass National Forest. I am well aware of how the Forest Service until fairly recently worked to ensure that any logs that were cut were processed in Alaska. That was good policy, and it should be reintroduced.

JM-5 Any timber sales on the Tongass--including the proposed Iyoutug sale--should be geared to what can be locally sawn. I see Icy Straits Lumber as something of a fragile operation, with particularly high costs of operation. Those high costs are structural, and will not disappear. The company may survive, but I wouldn't bet on it.

JM-6 I have purchased a considerable amount of wood from D&L Woodworks, and think the owners have found a solid niche in cutting specialty and commodity wood. I think the Forest Service should support operations such as D&L with a consistent and predictable supply of timber on the existing road system.

JM-7 The Forest Service should taylor its timber program on the Hoonah district to supporting an operation such as D&L. The proposed Iyoutug sale should be abandoned.

Thank you,
James Mackovjak
P.O. Box 63
Gustavus, AK 99826

Responses to JM – James Mackovjak

JM-1 – The DEIS and FEIS, Chapter 1, Purpose and Need and Proposed Action sections describe the proposed project, the Decision to be Made and whether and how to make timber available from the Iyouktug project area in accordance with Forest Plan goals. The scale of harvest varies by alternative and a wide range of alternatives are developed in Chapter 2. Chapter 3, Timber Economics and Environmental Consequences on Timber Economics, addresses economics. In addition, please see response to ISES-1.

JM-2 – Thank you for your comment about the importance of preserving productive deer habitat. The DEIS and FEIS, Chapter 3 (and the Wildlife and Subsistence Resource Report), Management Indicator Species and Other Wildlife, Sitka Black-tailed Deer section, and Subsistence section addresses the impacts of past and proposed harvest to deer winter habitat and subsistence hunting. Please see the response to BC-25 for information on how the cumulative effects analysis areas were defined. The analysis and project adhere to the management goals and objectives of the Forest Plan and ANILCA requirements.

JM-3 - Please see responses to BC-4 and JM-1.

JM-4 - Current law allows timber harvested from Federal lands in Alaska to be shipped out of Alaska only if the "the supply of timber for local use will not be endangered" (16 USC Section 616, enacted in 1926). Shipment outside the state of unprocessed timber from National Forest System lands in Alaska is allowed with prior approval by the Regional Forester after the sale is awarded if the request meets certain criteria. Such approvals have been granted in the past on a case-by-case basis at the request of the purchaser.

Recent trends in timber markets and manufacturing costs have made it very difficult for timber purchasers in Alaska to profitably process small diameter Sitka spruce and western hemlock timber harvested on the Tongass National Forest. Under current Congressional appropriations direction, Tongass timber cannot be offered for sale unless it has a positive appraisal. Several factors are making it very difficult for the Tongass National Forest to offer economic timber sales. Timber values are lower in Alaska than elsewhere, largely due to higher operating and transportation costs in Alaska. Other factors that contribute to low timber values include: current market conditions and high manufacturing costs in Alaska; the process the Alaska Region historically used to approve shipments of unprocessed timber out of Alaska; and the impact that process had on timber appraisals.

Unless the Tongass can offer a reliable supply of timber with a positive appraisal, the few remaining locally owned mills in Southeast Alaska will find it very difficult to stay in business. Closure of the remaining mills, even on a temporary basis, would run counter to the objective of supporting local economies and wood processing capacity in Southeast Alaska.

Allowing limited interstate shipments will allow timber to be appraised using higher lower 48 market values. This policy would substantially improve the likelihood that timber will achieve a positive appraisal, and continue to be offered for sale from the Tongass. For these reasons, the policy is needed to ensure the continued existence of adequate wood processing capacity in Alaska.

JM-5 – The DEIS and FEIS, Chapter 1, Purpose and Need, and Chapter 3, Employment in Southeast Alaska section show our support for local mills. The DEIS and FEIS, Chapter 3,

Timber Economics and Environmental Consequences on Timber Economics section address locally sawn timber sales. Chapter 3, Employment in the Project Area section addresses the Icy Straits Lumber and Milling Company. Please also see response to BC-3.

JM-6 – The Hoonah Ranger District currently offers small sales along existing roads that are available for purchase by any timber operators including D & L Woodworks.

JM-7 – We are proposing offering small sales from the Iyouktug project over an extended period of time. Please see responses to JM-5 and JM-6.

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

November 7, 2007

Forrest Cole
Forest Supervisor
Tongass National Forest
Federal Building
648 Mission Street
Ketchikan, Alaska 99901

RE: Iyouktug Timber Sale, Draft Environmental Impact Statement

Dear Mr. Cole:

NMFS-1 The National Marine Fisheries Service (NMFS) has reviewed the Iyouktug Timber Sale Draft Environmental Impact Statement (DEIS) and Essential Fish Habitat (EFH) assessment. The project is located in the northeastern part of Chichagof Island in the Iyoktug valley, northwest of the Iyoukeen Peninsula, approximately 12 miles east-southeast of Hoonah, Alaska.

The proposed action for the Iyoktug Timber Sale would harvest 4,185 acres of Forest Service (FS) land. The other four action alternatives would harvest in a range between 883 and 3,332 acres. The EFH assessment describes potential impacts to EFH in fresh and marine waters. Of a total of 330 miles of streams in five watersheds, 74 miles are Class I streams. Iyouktug, Suntaheen and Whitestone Head creeks and tributaries support populations of pink, chum and coho salmon. Iyouktug and Suntaheen creeks also have populations of Dolly Varden char, cutthroat trout and steelhead. Whitestone Creek also has Dolly Varden char.

Potential adverse effects to freshwater EFH include changes in water yield, sediment, water temperature, and fish passage at road crossings. You have determined that effects on water yield will be negligible because for all alternatives 10 percent or less of the canopy will be removed per watershed and 15 percent or less will be removed per sub-watershed. This is based on studies you have referenced, without citation, that show increases in water yield when a threshold of over 20 percent of the canopy is removed. We recommend that the final EIS include a citation for these studies.

NMFS-2 Water temperature increases may occur in streams when shade producing trees are removed. Approximately 1.3 percent to 3.9 percent of Class IV streams, less than 5 feet wide and generally far upstream of EFH will be harvested without buffers. Temperature increases are not expected in any of the watersheds.

Three to six new roads will cross anadromous streams and three to 20 new roads will cross streams above fish habitat. These stream crossing could increase sedimentation to fish streams.

NMFS-2 (cont.)

To address the potential adverse effects of this project to freshwater EFH, the FS has proposed that the following measures be taken.

- Stream buffers are prescribed along all Class I, II and III streams according to Forest Plan standards and guidelines. Class I and II streams will receive a minimum no-cut buffer of 100 feet and Class III streams will receive a slope break buffer.

- In areas where extensive windthrow has occurred or is expected, buffer widths will be increased to help ensure resistance to windthrow.

- Best Management Practices (BMPs) will be implemented to protect water quality and aquatic habitat for all freshwater streams. The unit cards contain specific applications of BMPs.

- Bridges will be placed at all road crossings over fish streams to minimize risks of sediment production and blockage of fish passage. All but three structures will be removed after the timber harvest.

- Temporary roads will be decommissioned following use for this timber sale and culverts will be removed.

NMFS-3

Potential adverse effects to marine EFH would be associated with use of the East Port Frederick marine access facility or "MAF". The MAF has been in use since 1983 and was listed by the State of Alaska under the Clean Water Act Section 303(d) for non-attainment of the residues standard for bark and woody debris. Dive survey information has documented an exceedance for the threshold bark accumulation, which was last documented in 2006 at 2.9 acres of continuous bark coverage. The MAF is the subject of a remediation plan submitted by Huna Totem Corporation to the Department of Environmental Conservation that is designed to reduce continuous bark coverage to less than 1.5 acres within a reasonable period of time.

NMFS-4

The marine waters of East Port Frederick are identified as EFH for a number of federally managed species, and species of concern to EFH, including the following: arrowtooth flounder, Atka mackerel, capelin, Chinook salmon, pink salmon, sockeye salmon, chum salmon, coho salmon, eulachon, Greenland turbot, octopus, Pacific cod, Pacific ocean perch, rex sole, rock sole, flathead sole, Dover sole, yellowfin sole, sablefish, sand lance, sculpin, shark, shortraker, rougheye and yelloweye rockfish, skate, squid, walleye pollock and weathervane scallops.

The potential adverse effects of the use of the MAF for log transfer by this project to marine EFH include diminished habitat value for managed species and their prey due to additional bark accumulation that smothers subtidal habitat. The FS has proposed the following measures to minimize negative effects to marine EFH.

- The FS will abide by all stipulations in Huna Totem's permits for operating the MAF.

- The FS actions will be in compliance with Huna Totem's approved remediation plan.

2

NMFS-4 (cont.)

- Optional loading of logs onto barges will help prevent further bark accumulation on the subtidal substrate.

NMFS-5

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) requires federal agencies to consult with NMFS on all actions that may adversely affect EFH. NMFS is required to make conservation recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects. As you have acknowledged in your EFH assessment, the Iyouktug Timber Sale would adversely affect both freshwater and marine EFH. You have incorporated measures into the project that would reduce these effects by abiding to all stipulations in Huna Totem's permits for the MAF, and complying with the approved remediation plan. You have indicated that optional barging of logs would further prevent bark accumulation on the subtidal substrate. NMFS recommends that given the degraded nature of the MAF site, mandatory barging of logs should be required to minimize the deposition of bark at the MAF. Mandatory barging is justified because it is an available technology, the site has exceeded the maximum depositional area for bark and is the subject of a remediation plan, and the FS should not counter efforts to remediate the site by knowingly allowing the use of log rafting when a better measure is available and feasible. Consequently, NMFS offers the following EFH Conservation Recommendation pursuant to Section 305(b)(4)(A) of the MSFCMA.

> Only barging of logs should be allowed at the East Port Frederick MAF. No rafting should be allowed to minimize the re-deposition of bark that would counter efforts of the remediation plan.

NMFS-6

Upon receipt of these EFH Conservation Recommendations, the MSFCMA requires Federal Agencies to respond to NMFS within 30 days informing us of the agency's decision regarding these recommendations.

Thank you for the opportunity to comment. If you have questions regarding our comments contact Linda Shaw at (907) 586-7585.

Sincerely,

James W. Balsiger
Administrator, Alaska Region

cc: *Chris Meade, EPA Juneau
*Tom Schumacher, ADF&G, Juneau
*Richard Enriquez and Bill Hanson, USFWS, Juneau
*Kevin Hanley, ADEC, Juneau
*Erin Allee, ADNR, Juneau
*Don Martin, USFS, Juneau

3

Responses to NMFS – James W. Balsiger, National Marine Fisheries Service (NMFS)

NMFS-1 - Thank you for reviewing Essential Fish Habitat in the Iyouktug Timber Sales DEIS. The citation noted as missing from the DEIS related to canopy removal and water yield is in the Watershed and Fish resource report and has been added to the EFH section in the FEIS.

NMFS-2 - Several of the items and measures you noted in your letter are found in the DEIS, Chapter 3; Watershed and Fish section under Direct and Indirect Effects on Water Quality – Temperature and EFH; these items and measures are also in the FEIS under the same headings. The Forest Service believes the use of BMPs, including the measures noted in your response are good measures and will insure protection of water quality and fish habitats.

NMFS-3 - The Forest Service is aware of the listing of the waterbody as impaired and of the LTF remediation plan (DEIS and FEIS, Chapter 3, Potential Adverse Effects on Marine EFH). The Forest Service will abide by all stipulations in Huna Totem's permit for operating the Marine Access Facility (MAF) and will be in compliance with Huna Totem's approved remediation plan. Barging logs is an option that may be considered to help prevent further bark accumulation on the subtidal substrate.

NMFS-4 - Please see response to NMFS-2.

NMFS-5 – Please see response to NMFS-3. We considered your recommendation, and it will be addressed in the decision.

NMFS-6 – We have written a response to NMFS related to the EFH. A copy of that letter is in the Project Record.

STATE OF ALASKA

SARAH PALIN, GOVERNOR

550 WEST 7TH AVENUE, SUITE 1420
ANCHORAGE, ALASKA 99501-3566
PHONE: (907) 269-8690
FAX: (907) 269-5673

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF HABITAT MANAGEMENT AND PERMITTING

November 19, 2007

Hans von Rekowski
IDT Leader
USFS Sitka Ranger District
Tongass National Forest
204 Siginaka Way
Sitka, AK 99835

Subject: **Iyouktug Timber Sales Draft EIS comments**

Dear Mr. Rekowski:

Biologists from the Alaska Department of Natural Resources Office of Habitat Management and Permitting (OHMP) have reviewed the USFS Draft Environmental Impact Statement (DEIS) for the Iyouktug Timber Sales in the Hoonah Ranger District. The project area is about 12 miles east of Hoonah on northeastern Chichagof Island. The DEIS describes four action alternatives that propose harvest treatments ranging from 883 to 4,185 acres. Shovel, cable, and helicopter yarding systems are proposed for partial and clearcut harvests. Each action alternative requires existing road reconstruction and new road construction.

OHMP-1 **ACMP Consistency**

Per 11 AAC 112 the activities described in the DEIS are consistent with the Alaska Coastal Management Plan (ACMP) under the *Tongass National Forest Timber Sales General Consistency Determination (GCD)* issued December 4, 2006. Timber harvest activities under the scope of this GCD meet or exceed the Forest Resources and Practices Act AS 41.17 (FRPA) and corresponding regulations. However, this GCD does not include fish habitat and passage related activities as outlined in the Memorandum of Understanding (MOU) 04MU-111001-094 between the Alaska Region of the U.S. Forest Service and OHMP.

OHMP-2 **Fish Habitat**

Each of the alternatives includes stream crossings for anadromous and resident streams in the area. The Catalog of Waters Important for Spawning, Rearing, or Migration of Anadromous Fishes (AWC) lists the following streams and their tributaries in the project area.

- Iyouktug River (112-13-10060) for coho, pink, and chum salmon
- Suntaheen Creek (114-27-10150) for coho, pink and chum salmon, Dolly Varden char, and steelhead and cutthroat trout
- Whitestone Head Creek (114-27-10180) for coho, pink and chum salmon, and Dolly Varden char
- Unnamed creek (114-27-10120) for coho, pink and chum salmon, Dolly Varden char, and steelhead and cutthroat trout

OHMP-2 (cont.)

- Unnamed creek (114-27-10260) for pink salmon

OHMP-2 (cont.) OHMP biologists will coordinate with Forest Service staff during the concurrence process to gather the appropriate information for each stream crossing concurrence. This includes collecting data on the ground to verify presence and extent of fish species to update the AWC.

OHMP-3 On September 1, 2006 OHMP submitted comments on Iyouktug Timber Sales scoping document. Thank you for addressing our concerns in the DEIS. We would like to submit the following points/comments for consideration in the Final EIS.

- Page 3-153: The Road Density and Stream Crossings section states that there are 5 red, 6 gray and 31 green culverts in the project area. How many red culverts will be replaced? How many gray culverts will be re-assessed to determine fish passage ability?
- Page 3-158: In the Alternative 2 section the second paragraph states "There would be 10 new class III stream crossings, eight of which are in the Iyouktug Watershed, and five in the North Fork Iyouktug subwatershed." It isn't clear whether there are 10 new stream crossings or 13 as the combined total suggests.
- The map for road 853431 appears to show several class IV crossings for alternative 2 that are not discussed in the narrative.
- The map for road 85345 displays a class II stream but the narrative states a class I crossing of a tributary of AWC stream #112-13-10060.
- The map for road 85300 does not show class II or IV crossings listed in the narrative.
- The map for road 85312 appears to only show one class III crossing contrary to the narrative.
- The map for road 85313 doesn't display the class IV crossings listed in the narrative.
- The map for road 85307 doesn't show class II and III crossings described in the narrative.
- The map for road 8534 doesn't show several class II and III crossings in the narrative.
- The map for road 8535 does not show several class II and III crossings in the narrative.

Thank you for the opportunity to comment on this project. We look forward to working with you during the concurrence process. If you have any questions please contact Habitat Biologist Kristen Dunlap at (907) 465-1635 or kristen.dunlap@alaska.gov.

Sincerely,

Sheila A Cameron

FOR Jackie Timothy
Juneau Area Manager
Office of Habitat Management and Permitting

Cc by email:

Al Ott, OHMP, Fairbanks
Erin Allee, OPMP, Juneau
Kevin Hanley, ADEC, Juneau
Kevin Monagle, ADFG, Juneau
Brian Glynn, ADFG, Juneau
JT Stangle, USFS, Sitka
Phil Mooney, ADF&G, Sitka
Jerry Medina, Hoonah Coastal District

* NMFS, Juneau
*nepa.comments@noaa.gov

*email

Responses to OHMP-– Sheila A. Cameron (for Jackie Timothy), Office of Habitat Management and Permitting (OHMP)

OHMP-1 – Thank you for reviewing the Iyouktug Timber Sales DEIS. The Forest Service will comply with fish habitat and passage related activities as outlined in the Memorandum of Understanding (MOU) 04MU-111001-094 between the Alaska Region of the U.S Forest Service and OHMP.

OHMP-2 - Forest Service Staff will coordinate with OHMP biologists during the concurrence process to gather the appropriate information for each stream crossing concurrence

OHMP-3 – We have updated the information about the number of red and gray pipes in the FEIS, Road Cards, and the Watershed and Fish Resource Report. These sections now provide information on how red and gray culvert removal/replacement will be addressed through this timber sale and in the future. An updated list of all fish stream crossings, their locations and their passage status, within the project area and along the haul route, has been added to the Watershed and Fisheries Resource Report. Currently there are 5 red, 5 gray, and 29 green pipes within the project area. One of these red pipes will be addressed in 2008 during routine road maintenance. Of the four remaining red pipes, three would be removed under Alternatives 2 and 4 and two would be removed under Alternative 3. One red pipe, which would be removed under Alternatives 2, 3, and 4, is also proposed to be removed under the ATM decision. One gray pipe will be removed under Alternatives 2, 3, and 4. Additionally, there are 2 red, 2 gray, and 13 green culverts along the haul route outside the project area boundary. Between 2000 and 2005, 14 red pipes have been replaced within the project area. Ten of these culverts are now green, three are gray and one is red (additional culvert information is included in the Iyouktug project record); this red culvert is the beforehand mentioned culvert that is scheduled for repair in 2008. There is currently no schedule for re-assessing gray culverts. Gray pipes within the project area and elsewhere will be resurveyed, classified as red or green, prioritized and replaced if needed, as funds become available. Also, the narrative you noted in the Direct and Indirect Effects on Water Quality – Sediment; Stream Crossings and Road Miles section has been revised to more clearly convey the information.

Most Streams within the project area were mapped using a coarse scale inventory. This inventory used aerial photo interpretation and limited field verification. Field surveys as part of this project only accurately updated the number and location of streams within the boundaries of ground based equipment harvest units. Also, field surveys of proposed roads as part of this project and those conducted as part of past Road Condition Surveys (RCS) were used to generate the narratives. These surveys included walking proposed and existing roads identifying stream crossings, recording their channel type, stream class and morphological measurements along those routes. Streams in these locations were not fully mapped, but GPS points were taken at each stream crossing point and can be found in the project record. Consequently, the narratives in the road cards provide the most accurate information to date regarding the number and types of stream crossings. Additionally, for road cards covering existing road segments, only streams crossings that would entail structure replacement or reconstruction are listed. All other stream crossing structures along these existing road segments are currently structurally sound and would remain and be used, as is.

STATE OF ALASKA

SARAH PALIN, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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October 21, 2007

Mr. Hans von Rekowski
U.S. Forest Service – Tongass National Forest
Sitka Ranger District
Sitka, Alaska 99835

Dear Mr. Rekowski:

Subject: **No Additional ACMP Review Required**
USFS Iyouktug Timber Sales
State I.D. No. 2007-1002J

OPMP-1 The Office of Project Management & Permitting (OPMP) has received the Draft Environmental Impact Statement (DEIS) describing the effects of the U.S. Forest Service's proposed timber sales near Hoonah, Alaska. The DEIS outlines one no action alternative and four action alternatives that all include road building and reconstruction as well as use of an existing marine access facility (MAF) at Long Island, near Hoonah, Alaska.

On December 4, 2007 the OPMP issued the final consistency response for the Tongass National Forest Timber Sales General Consistency Determination (see attached). This GCD does not apply to logging camps, log transfer facilities, public works as defined in 15 CFR 930.31(b), and activities that are not addressed by the Forest Resources and Practices Act (FRPA). Because all four action alternatives within this DEIS propose the use of an existing MAF and no camps are proposed, OPMP believes the GCD applies to this proposed timber sales activity and no additional Alaska Coastal Management Program (ACMP) consistency review is required for these Iyouktug timber sales.

OPMP has also consulted with the State of Alaska Office of Habitat Management & Permitting (OHMP), the Division of Mining, Land and Water (DMLW), the Alaska Department of Environmental Conservation (ADEC), and the Hoonah Coastal District regarding this project. These State and local agencies concur that the USFS GCD applies for this timber sale activity and no further review is required.

OPMP-2 If changes to the approved project are proposed prior to or during its siting, construction, or operation, please contact this office immediately to determine if further review and approval of the

Mr. Hans von Rekowski, USFS
Iyouktug Timber Sales
ID 2007-1002J

October 21, 2007

OPMP-2 (cont.) revised project is necessary. If the project is changed in any significant way, or if the actual use differs from the approved use contained in the original project description, the State may amend this State approval, and may require a consistency determination.

OPMP.3 If the proposed activities reveal cultural or paleontological resources, the applicant is to stop any work that would disturb such resources and immediately contact the State Historic Preservation Office (907-269-8720) and the U.S. Army Corps of Engineers (907-753-2712) so that consultation per Section 106 of the National Historic Preservation Act may proceed.

If you have any questions, please contact me by email at erin.allee@alaska.gov or by phone (907) 465-8790. Thank you for your cooperation with the ACMP.

Sincerely,

E Allee

Erin Allee
Project Review Specialist

cc: Kevin Hanley – ADEC, Juneau*
John Dunker – ADNR/DMLW, Juneau *
Jackie Timothy – ADNR/OHMP, Juneau *
Claire Batac – ADNR/OPMP, Juneau *
Joe Donohue – ADNR/OPMP, Juneau *
Jerry Medina – Coastal District Coordinator, Hoonah*
Forrest Cole – USFS, Tongass National Forest, Ketchikan*
Randy Coleman – USFS, Tongass National Forest, Juneau*

*E-mail

Responses to OPMP – Erin Allee, Office of Project Management and Permitting

OPMP-1 - Thank you for reviewing the Iyouktug DEIS and for providing the determination that no additional Alaska Coastal Management Program (ACMP) review is required because this project falls within the General Consistency Determination (GCD).

OPMP-2 - If the Iyouktug Timber Sales is changed in any significant way, or if the actual use differs from approved use contained in the original project description, the Forest Service will notify the State in accordance with the ACMP MOU.

OPMP-3 - If previously unknown cultural and paleontological resources are discovered during the project, activities in the vicinity will cease and the operator will protect the discovery and notify the Forest Service (District Ranger). The Forest Service in consultation with Native organizations and the Alaska State Historic Preservation Officer will determine a course of action (see chapter 2 DEIS, Activities and Design Elements Common to All Action Alternatives, Heritage Resources).

"Paul Barnes" <haikuaikido@gmail.com>
11/18/2007 08:53 AM

To: comments-alaska-tongass-hoonah@fs.fed.us
cc:
Subject: Proposed Iyouktug timber sale

Dear Forest Service,

PB-1 I'm writing to comment on the proposed Iyouktug timber sale near Hoonah. The current plan calls for logging 59.8 mmbf. The proposed amount is completely out-of-line with what can be utilized locally.

PB-2 Logging that amount of forest in an already logged area completely ignores all other values of the forest. The Forest Service has a mandate to include all users of the forest in it's decisions. The proposed action favors logging and compromises all other uses. NE Chichagof Island is one of the most, if not the most, heavily logged areas on the entire Tongass. To even offer a timber sale in this area is questionable!

PB-3 If more logging is to occur, it must be a smaller sale (under 4mmbf).

PB-4 The Forest Service needs to wake up to reality. The large timber sales of the past are over. To prove my point, I'll end with a question. Who does the Forest Service expect to bid on this sale? Please don't suggest the local mills who have already stated that the sale is too big. The only slim possibility is finding some large, non-local (usually foreign) company to come in and round-log export the whole thing, benefitting virtually no one and treating SE Alaska like a 3rd world country. As a 37 year resident of the Icy Strait area, I've witnessed this nonsense long enough. We must do better. Thank you.

Paul Barnes
Box 155
Gustavus, AK 99826

Responses to PB – Paul Barnes

PB-1 - Please see response to EH-1

PB-2 – The Forest Plan allocated LUDs and established standards and guidelines for resource protection to provide for all users of the Forest. While the Iyouktug project area has lands to provide for timber production, there is also land allocated to Old-growth Habitat Reserves for the benefit of wildlife. It is impossible to meet all resource needs on every acre.

Please also see responses to BC-3, BC-4, BC-25, and EH-1 and the Chapter 3 Affected Environment and Environmental Effects.

PB-3 - A smaller timber sale alternative (Alternative A at around 5 MMBF) and an alternative containing only small sales (Alternative F) were considered in the DEIS and FEIS, but were eliminated for the reasons described in Chapter 2, Alternatives Considered but Eliminated from Detailed Study**.** Please also see response to BC-4.

PB-4 - Please see responses to EH-1 and JM-4. Potential buyers include local mills in Hoonah and Gustavus as well as purchasers from other parts of the Tongass National Forest.