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First name: Karen  
Last name: Petersen  
Organization: POW Forest Products Task Force  
Title: Co-Chair  
Official Representative/Member Indicator:  
Address1: PO Box 490  
Address2:  
City: Klawock  
State: AK  
Province/Region:  
Zip/Postal Code: 99925-0490  
Country: United States  
Email: info@princeofwalescoc.org  
Phone: 907-755-2626  
Comments:  
Prince of Wales Chamber of Commerce

PO Box 490 [bull] Klawock, AK 99925-0490

Phone: (907) 755-2626 [bull] Fax: (907) 755-2627

[www.princeofwalescoc.org](http://www.princeofwalescoc.org)

Email: [info@princeofwalescoc.org](mailto:info@princeofwalescoc.org)

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Re: Comments to the POWLAT from the POW Forest Products Task Force

To USFS & POWLAT:

The Prince of Wales Forest Products Task Force has been meeting since 2003 as a committee of the Prince of Wales Chamber of Commerce. Over the years the Task Force has requested a number of changes be made to the Forest Plan with regards to the MicroSale Program and the small timber sale program. We would formally like to submit all of those requests to the POWLAT for consideration and inclusion into the upcoming Landscape Assessment.

For the MicroSale Program, we would like you to include the following changes:

1. Expand the Roadside EA to 1200 feet in Timber LUD areas only
2. Allow the salvage of dying or standing dead trees
3. Include the beach buffers in the OGR as part of the Roadside EA
4. Have RED CEDAR be exempted from the export policy in microsales

For Small OLD GROWTH SALES please consider the following guidelines:

1. EXEMPT all old growth for export in the round.

2. Do not require scaling for sales under 1MMBF
3. Offer timber units that have appraised NEGATIVE in the past at Tongass Standard Rates or even the POW MicroSale Rate.

For Young Growth sales that will be coming up the following thoughts might be incorporated:

1. Allow 10 year contracts for YG sales. This would allow a mill owner to take a contract to the bank and get financing. And configure them so that only 500,000mbf need to be harvested per year. That would be a 5 mmbf total sale.
2. Allow YG to be exported (as opposed to Old Growth)
3. Require that all Recreation cabins on the Tongass be replaced with YG from Alaska only.
4. Allow Biomass Only sales from YG (ie firewood or chips)

Finally - Include biomass into NEPA documents. One of the challenges with all of the above is that when they did the NEPA originally on timber harvests they did not include any provision for biomass removal from a closed out timber sale. This means to just remove existing slash from timber units (we are told) will require all new NEPA which is very expensive. Even now they are NOT including biomass into the language of planning documents for new timber sales.

Thank you for your consideration,

Sincerely,

Karen Petersen and John Bruns,

POW Forest Products Task Force CoChairs