

Date submitted (Alaskan Standard Time): 12/12/2017 8:52:16 AM

First name: Eric

Last name: Nichols

Organization:

Title:

Official Representative/Member Indicator:

Address1: Forest Park

Address2:

City: Ketchikan

State: AK

Province/Region:

Zip/Postal Code: 99901

Country: United States

Email: ericnichols@kpunet.net

Phone: 9076171769

Comments:

Economics do not seem to be a part of the timber harvest plans for young growth or old growth.

The timber harvest plans for young growth under the wolf guidelines violates the method and the spirit of the TAC recommendations for the transitioning to young growth. With small strip cutting on 10 year intervals the positive economics of young growth timber harvest will not be achieved.

The TAC recommendation was based on the max clear cut size of 100 acres to achieve the volume and economics of young growth harvesting in order to make the volume of young growth available over the next 15 years.

It appears the silviculture of our young growth forest are now being based on a TNC paper that has not been vetted for economics or has been reviewed to see if this is the most cost effective treatment for wildlife. As the industry struggles to make the capital expenditures needed to make young growth economically viable in SE Alaska we continue to see our young growth forest being managed with voodoo silviculture managed for wildlife considerations only. The timber industry has to have a stable land base dedicated to timber where the primary objective is to grow and harvest timber. The conservation organizations can play in non-timber LUDs to test their ideas on forest management.