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Comments:

"Life of the project" is not clearly defined, although there is a reference to "the course of 10 to 15 years." Fifteen years is an inadequate planning horizon in a biological system that requires many decades to reach demonstrated harvest feasibility, and centuries to reach steady state after disturbance. A fifteen-year horizon is grossly inadequate even when hoping for the unproven, perhaps magical, young-growth timber sales.

**Geographic Scope:** The POW LLA analysis references "Prince of Wales and outer islands," but limits the analysis to the lands managed by the Craig and Thorne Bay Ranger Districts, in deference to the significant amount of old-growth timber base that has been transferred to state and private entities for intensive timber harvest. Although the USFS no longer has jurisdiction over those transferred lands, our federal government should still be planning and managing with the entire ecosystem and economy in mind. The activities on the transferred lands will definitely impact "forest ecosystem health", "community resilience", and "multiple resource objectives."

**Economic Modeling:** there is no economic modeling to be found in the POW LLA. The stated economic purpose of the POW LLA is to "support community resilience," but the implied economic purpose is to support a specific private corporation: a large, green-timber, old-growth, round-log-export business on the island. That amounts to the federal government "picking winners and losers." An economic model that considers all of Prince of Wales and outer islands should factor in the intensive old-growth logging that will occur on transferred lands over the fifteen year horizon of the POW LLA. If current round-log exporters can't survive in the midst of intensive old-growth logging, perhaps they are not a viable entity. It should not be the role of the federal government to reward non-competitiveness at the expense of other uses of the forest, including small-scale, "cottage industry" timber production. I, along with many others purchase lumber that has been harvested and processed on Prince of Wales Island. I like to support my community. I like to work with local wood products. I like to keep my carbon footprint reasonably small. The growing market for primary and second homes on Prince of Wales, increasingly owned by people who value environmental stewardship and local jobs will likely enhance the market for locally harvested and processed lumber, as long as those small operators have access to adequate timber volume, responsibly managed. Small operators are less efficient than large industrial operations, but that fortunately leads to more people being employed, which bolsters "community resilience," just as it does in the commercial fishing industry.

**Invasive Species Management:** the use of herbicides in the fight against invasive species will be never-ending, introducing chemicals into the local food chain that will end up in deer, grouse, fish, and shellfish, and then humans. The invasive plant species are the inevitable result of soil disruption, and the importation of down-south construction equipment, vehicles, and work boots. Adding chemicals is futile and dangerous.

**Road Management:** Roads not only introduce invasive species, they introduce ever-increasing numbers of humans. I occasionally fantasize that the roads were built exclusively for my friends, and me. I then return to reality and realize that if I can drive there, everyone can drive there, and the population of the island is increasing. Wildlife needs some refuge from humans in order to re-stock game populations for our hunting and subsistence benefit. I hope that we can preserve some of our "Alaska Experience" for our kids, but easy access to paradise leads to permit systems and regulatory restrictions; which is the "Lower 48 Experience." As people say in the North, "If it is easy to get to, it soon ceases to be worth getting to."