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Comments:

December 19, 2017

The City of Craig offers the following comments in response to the Draft Issue Statements and Alternatives document resulting from the Prince of Wales Landscape Level Assessment project. I understand that comments are due by Tuesday, December 19, 2017.

1. Invasive Plant Management. The US Forest Service should reserve an option for use of herbicides when and if mechanical and manual treatments are not effective in inhibiting spread of the invasive species, when the negative impact from the spread of the invasive species threatens to preempt native flora and fauna.

2. Issue Statements 2-5. These statements all juxtapose logging and road building with other resource issues. My understanding of the series of POWLAT meetings is that those participating in the POWLAT process considered all resource issues as the team's suggestions to the US Forest Service were collaboratively developed. Structuring the draft issues document with logging/roadbuilding as a common denominator relative to all other identified uses seems misplaced given the hours of effort POWLAT put into balancing forest uses.

3. Alternative 2.

a. Page 11 of the issues document, at the "Commercial old-growth timber harvest" section, the Alternative 2 column lists old growth timber sales at "up to an average of 25 mmbf of old growth" per year for years 1-5 of the LLA. The modifier "up to" is also included in the 6-10 year range text. The documentation produced by POWLAT calls for the USFS to offer "an average of 25 mmbf per year" of old growth timber, not up to an average of 25 mmbf. I encourage the USFS to modify Alternative 2 to implement POWLAT's full proposal here. Adding the words "up to" to the POWLAT text means that the annual timber production could be consistently less than 25 mmbf, or even zero mmbf, both of which are clearly contrary to the intent of the team.

b. The section titled Old Growth Small Sales Strategy calls for a set aside of 25 percent of planned old growth harvest acreage for sales to small timber operators from sales that exceed three million board feet. The nexus between timber volume offered for sale and an associated acreage set asides is not intuitive. I suggest simply identifying suitable units for harvest by small operators, in a volume sufficient to meet market demand, without adding a set aside criteria based on volumes released in separate sales over three million board feet.

Thank you for considering my comments.

Mayor Tim O'Connor