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First name: Gordon  
Last name: ChewDon NicholsonZach LaPerriereErnie Eggleston  
Organization: Tenakee logging Co, Fair N Square Milling, Timberworks, LLC, Happy Lumber  
Title:  
Comments:  
HC6400

December 17, 2019

Dear Secretary Perdue and Ms. Christiansen,

We are small-scale forest business owners who make our livelihoods on the lands of the Tongass National Forest. We represent loggers, sawmill owners, and wood products businesses. Some of us are just breaking into the industry while others have carried on a family business over generations. Each of us hunt, gather, fish, and live locally. The forests of Southeast Alaska shape our personal histories, our livelihoods, and our culture. We depend entirely on the Tongass.

We have supported one another as some have chosen to continue an approach to forestry that prioritizes purchasing, cutting and sustainably using old-growth at the small (less than 10MMBF) and micro (less than 50 MBF) level, while others among us have embraced the planned transition to second-growth logging on the Tongass National Forest. Additionally, some of us focus entirely on salvaging wood. Together, we produce some of the best quality wood products you can find in America. Selling our wood products locally keeps money circulating in and between our Southeast Alaskan communities, and enriches our families and our region.

We understand the importance of using the Tongass National Forest in ways that ensure the future value of our region's wild places, and old-growth forests. We believe that properly managed small-scale, high-value-added industries can be economically viable and profitable for our rural communities, while sustaining our natural resources, keeping the forest healthy and productive for future generations who will continue to live in the Tongass.

**\*For this reason, we urge you to select the No-Action alternative and keep the 2001 National Roadless Rule on the Tongass\* [Text bolded for emphasis].**

As a result of the Collaborative Stewardship Process initiated under the 1997 Tongass Land Management Plan (TLMP), the microsale timber program began in 2000 and has since provided hundreds of microsals at volumes usable and affordable by small-scale operators like us, that live and work in the Tongass. These sales have been processed locally, helping transform the timber industry from a cut-and-run operation where outsiders come in to do the logging, and raw logs get shipped out, to one that supports local communities and businesses, without harming the many diverse economic and social uses of the landscape.

Since the microsale program allows logging only from the existing road system, it has consistently produced sales that are economical not only for the operators involved, but also for the Forest Service and the U.S. taxpayer. By harvesting old-growth sustainably, dead or downed wood, as well as wood left as "waste" by larger operations, local operators are now at the forefront of logging innovation, as well as conservation, on the Tongass.

By avoiding sensitive areas and the practice of clear cutting, the microsale timber program has supported small-scale operators; reduced litigation; and ensured the continued health and vitality of important deer and wild salmon habitat, which in turn supports recreation, tourism, subsistence uses and Southeast Alaska's commercial fishing industry. Notably, commercial fishing is an economic backbone of Southeast Alaska. The health of Salmon relies upon the health of the Tongass National Forest as it's these streams and rivers which produce 80% of the commercial salmon harvested from Southeast Alaska each year.

A recent and successful example of a small sale approach is the 2017 Wrangell Island Timber sale Originally proposed for 90 MMBF, it was ultimately reduced to 507 MMBF. This result shrunk this deficit sale to a size where the agency could meter out a 10-year supply of more economical supply of small timber offerings to local Wrangell operators.

The July, 2nd 2013 Secretary's Memorandum 1044- 009 directed management of the Tongass National Forest to expedite the transition away from old-growth clearcutting and towards a forest products industry that logs predominantly second-growth - or young-growth -forests. The memorandum also affirmed that "this transition to a more ecologically, socially, and economically sustainable forest management is a high priority for USDA, the Forest Service, and the Tongass National Forest," Since adoption of the 2016 Tongass Land Management Plan the Forest Service completed the most intensive young growth timber cruise ever conducted on the Tongass (80,000 plots on 40,000 acres of young growth).

Recent analysis of the updated young growth inventory data indicates that we can end the controversial practice of clearcutting old-growth on the Tongass now and begin sustainably logging second growth. Mater engineering compiled the analysis in their Tongass in Transition: 2019 Update report (attached). The report identified 138,760 currently existing young growth acres in suitable (low environmental risk) areas located within 800 feet of existing and open Forest Service roads, with 100% of these acres located at less than 1,000 feet in elevation. This data clearly shows the transition to logging only young growth is currently possible on the Tongass. If the Forest Service is truly serious about a continued logging industry in Southeast Alaska, it is more evident than ever that young growth is the answer. As a result, the timber industry in Southeast Alaska can immediately stop the controversial practice of industrial-scale-old-growth clearcutting.

The fate of the Alaska Roadless Rule is well within your control, Secretary Perdue; selecting the No-Action alternative will allow the Forest Service to meet the needs of Southeast Alaskan small-scale wood business owners without harming the intact roadless areas so important for the longevity and strength of Southeast Alaska's primary job producers - the fishing and visitor sectors.

**\*Again, we urge you to support keeping the 2001 National Roadless Rule on Tongass National Forest by selecting the "No-Action" alternative on the Alaska-specific Roadless Rule.\*** [Text bolded for emphasis]

Thank you for your time and consideration,

**\*Michael Sallee\***[Text bolded for emphasis]

Ketchikan Ak 99901

Moser Bay, Alaska in Ketchikan Gateway Borough

Description: I've been milling rough-sawn dimensional lumber, primarily with a Mobile Dimension sawmill, since the early 1980s. It is a part-time operation supplemented by my commercial fishing and other sources of income. With very rare exceptions of purchasing logs, e.g., from a USFS sort yard auction in 1997, my logs come almost exclusively from beach-salvage of trees carried to tide water by wind-throw or landslides. I also occasionally get logs from neighbors clearing trees from their homesites. While I usually mill these private logs for a nominal fee, I have milled logs for half of the grade and species are suitable for filling my own wood orders. I've milled logs for a few people that had the means of felling, yarding and towing logs from areas open to the USFS 10,000bf free-use program. While I've never kept a rigorous tally of log scales, I'd estimate that I've never milled more than about 35,000bf annually. I've milled wood for beams, decking, exterior siding, interior paneling, framing, and interior or exterior trim, boat planks and timbers, art projects such as Native masks, paddles, bentwood boxes, wide slabs for coffee tables and panels, CVG spruce for windmill blades, etc. Except for the few neighbors who can access my mill by a trail the vast majority of the logs coming and lumber leaving my mills by water transport.

**\*Gordon W Chew\***[Text bolded for emphasis]

Tenakee logging Company

Tenakee Springs, Alaska 99841

Description: We log only selectively marked timber sales (100,000 bf per year), historically old growth but now Young Growth. These 50 year old trees are of surprising high quality with almost no defects. Our Lumber Mill is located in Corner Bay, Alaska

**\*Don (Grizz) Nicholson\***[Text bolded for emphasis]

Fair N Square Milling

Coffman Cove, AK

Manufacturing and retail sales of construction lumber

Raw materials sourced from local harvesting operators,

From both private and US Forest Service lands

**\*Zach LaPerriere\***[Text bolded for emphasis]

Timberworks, LLC

Sitka, Alaska, 99835

Description: My main business is the harvest of dead and down trees to make both functional and sculptural wood vessels and bowls. Most of my wood comes from public land, including harvest in roadless areas, by USFS permit. The only machinery I use in logging is chainsaws, the rest is taken out the old fashion way: carrying, pulling via mechanical advantage, and sledding when snow allows. My customers are around the world, and they appreciate that I only harvest Tongass old growth in sustainable manners. I also do a small amount of custom fine woodwork, such as cabinetry and doors. For business I sue an average of 2-5,000 board feet per year. Multiple people and organizations have told me that I get some of the highest value per board foot of any timber product business in Alaska. I personally suspect that guitar wood may be more valuable, though a small percentage of my pieces are upwards of \$2,000 with only a few board feet of salvaged wood.

**\*Ernie Eggleston\***[Text bolded for emphasis]

Happy Lumber

Sitka, AK 99835

Description: A custom sawyer; I don't log anymore but saw wood for others.

[Position]