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“Protecting the natural environment of the Tongass while supporting the development of sustainable communities in Southeast Alaska – since 1967.”

February 22nd, 2013

To the Planning Team for the Ray, RayRay, and High Road Timber Sales:

Thank you for the opportunity to submit scoping comments on the Ray, RayRay, and High Road timber sales projects. We applaud the Forest Service for listening to the community and taking into consideration local priorities for land management. You have heard the feedback from the community that there is room for timber sales and logging on the lands of the national forest, but that a large scale industry that has a predominant export component is not something that we want. We recognize that the timber industry of the past took the very best trees and logged the most productive watersheds. We recognize that there was not a lot of thought given to future generations and that now, as members of those future generations, there are less opportunities for logging and using wood products from the Tongass. We know that planning a timber program is difficult for you as the remaining wood stands are either of marginal economic value, are ecologically sensitive, or are in areas that are socially and culturally valuable for uses other than timber.

The things that we like about this sale are that it entails small-scale selective harvest of high value while intentionally being designed to support small sawmills located in the surrounding communities. In this way, we believe that you are seeking to supply local demand while taking into consideration the scale of local business and their ability to operate and utilize the timber from Forest Service lands.

The components of this sale that we are concerned about are there is no mention of young growth timber offerings in the document even though we were previously led to believe that the sale would include a young growth alder and spruce component. This is alarming for us because we feel that we have been led to believe that the Forest Service is committed to a “Tongass transition” that would shift timber harvest from old growth to young growth. In this sale, we see the old growth, but not the young growth. If a transition is to be successful, there should be young growth components so that operators can begin to use, understand, operate with, and market Tongass young growth. Last year, local operators were able to experiment with young growth and take tentative first steps. If those first steps are not supported with continued encouragement and offerings, those first steps will flounder, dissipate, and all momentum will be lost.

We would also flag potential high-grading in selective cut timber stands in this sale. We do recognize the need to cut the valuable trees, but a basic silvicultural principle is leaving seed-source trees in the stand that have good genetics to propagate continuing generations of good timber. In this way, we are thinking of future generations and the timber that we leave them to harvest. Speaking for a generation that has been left a legacy of poor land management decisions and environmental degradation, we feel strongly about leaving this place better than we found it for future generations that come after us. We should keep this in mind with individual

tree selection and ensuring that there are trees growing up and good genetics for future timber potential.

Thank you for listening to the community in designing this timber sale. We see this as a step in the right direction for the Tongass timber program and we sincerely hope that the actions taken on the Hoonah and Sitka Ranger districts are forerunners of more widespread change across the entire Tongass National Forest and more widespread change in the Tongass Timber sale program.

Sincerely,

Andrew Thoms

Ray Friedlander

Sitka Conservation Society