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February 18, 2016

Attn: Forest Plan Amendment

Dear Forest Supervisor Stewart:

Since 1970, the Southeast Alaska Conservation Council (SEACC) has dedicated itself to preserving the integrity of Southeast Alaska's unsurpassed natural environment while providing for balanced, sustainable use of our region's resources. Our members live across Southeast Alaska, from Hydaburg on south Prince of Wales Island to Yakutat, and include commercial fishermen, Native Alaskans, value-added wood manufacturers, tourism and recreation business owners, hunters and guides, and Alaskans from all walks of life. The Tongass National Forest is America's biggest, wettest and wildest National Forest. A natural treasure of international and national renown, it is also our home; our Native brothers and sisters enjoy intimate connections with this incredible place that stretch back for millennia.

Like Secretary Vilsack, we recognize Southeast Alaska's greatest economic opportunities in the 21st Century lie in preserving Tongass' old-growth rainforest, and maintaining its invaluable contribution to the region's thriving fishing and tourism-based economy, and recreational, customary, and traditional practices of local communities. *See Secretary's Memorandum 1044-009 (July 2, 2013).* As one of the most intact, carbon-dense temperate rainforests left on earth, Tongass old-growth forest serves as a "carbon life-raft" for storing carbon and maintaining America's resilience in the face of climate change. Conservation of Tongass old-growth is essential for slowing down climate change throughout Alaska and the world.

As the responsible officer for this planning decision, your leadership is essential to help us chart a new course for Tongass management. Today, twenty-five years after Congress ended "timber-first" management on the Tongass in the landmark 1990 Tongass Timber Reform Law, the region is poised for a new and different chapter in Tongass management. We can't keep throwing millions of tax dollars a year for the next 15 years at large timber sales designed for export. Our path forward requires investment in Southeast Alaska's ongoing economic transformation in recognition of the fundamental changes that are occurring in demand for timber, fish and wildlife, outdoor recreation and tourism on the Tongass today. Today, commercial fishing, tourism and recreation, government and health care dwarf timber's role in Southeast Alaska's economy.

SEACC submits these comments on the proposed amendment to the 2008 Tongass Land Management Plan (Proposed Plan) and the Draft Environmental Impact Statement (DEIS) accompanying it. All the documents cited in these comments were emailed to the Forest Service along with these comments. SEACC is also signing on with other conservation groups to additional comments that will be submitted under separate cover. Please incorporate all of this information into the administrative record for this Tongass Amendment. SEACC also joins comments on the Proposed Plan submitted by Earthjustice on our behalf, and other fellow conservation organizations, with accompanying materials. Those comments are an integral part of SEACC's comments on the Proposed Plan.

The Proposed Plan tiers to the 1997 Revised Tongass Land Management Plan (TLMP), the 2003 Final SEIS for Roadless Evaluation for Wilderness Recommendations, and the 2008 TLMP Amendment and Record of Decision (ROD). *See* DEIS at 1-2. SEACC incorporates all our past comments, and supporting attachments to the Forest Service related to the TLMP revision process, including the 1990 DEIS, 1991 SDEIS, 1996 RDEIS, 2002 SDEIS, and our comments on the 2007 DEIS. By this reference, we also incorporate the appeals, exhibits, and intervenor comments we submitted in our appeals of the 1997 Revised TLMP and the 2008 TLMP Amendment, including the 1998 Stay Request submitted with other appellants. Last, please incorporate our comments in 2013 on the Tongass Five-Year Review into this planning record. These comments urged the Forest Service to proceed expeditiously with a narrow plan amendment to achieve a rapid and concrete transition away from historical old growth clearcut logging, strengthen the wildlife conservation strategy by maintaining future options, and help local communities restore and maintain the productivity of their forest homes.

The Forest Service identified Inventoried Roadless Areas as a significant issue for this amendment process. According to the May 27, 2014 Notice of Intent, this amendment would address “whether the inventory of roadless areas should be updated.” SEACC attaches comments submitted between 1998 and 2003 relating to the Tongass and the Roadless Area Conservation Rule, including whether to include the Tongass in the interim suspension of road building in inventoried roadless areas, the proposed rule, comments on the scope and draft Roadless Area Conservation EIS, and the subsequent rulemaking process that exempted the Tongass from the Roadless Rule in 2003.¹ We had hoped the agency would use this amendment process to support additional rulemaking and update the 2001 roadless area inventory. Such an update would have removed the so-called “roaded roadless” from the inventory, areas that were roaded before the 2001 Roadless Rule or during the eight years the Tongass was exempted from the 2001 Roadless Rule. A rule change would also conserve roughly 500,000 acres of roadless wildlands under the 2001 Roadless Rule excluded from the Tongass roadless inventory used for developing the 2001 Roadless Rule because of assumed logging development

¹ The referenced documents are attached to these comments as Exhibits 1-5, and expressly incorporated into this administrative planning record because they were developed in a parallel, yet separate, agency rulemaking process.

that never occurred. Such action would conserve remaining intact old-growth habitat, maintain existing carbon stocks, and increase carbon stored.

SEACC strongly supports this public planning process. Thank you for considering SEACC's comments and recommendations on the Proposed Plan. We remain dedicated to working toward a balanced, sustainable, environmentally and economically sound future for our home. We submit these comments on the Proposed Plan in good faith towards that end. After highlighting our major concerns with the agency's Preferred Alternative (Alternative 5) and comment on other Plan issues, we offer our recommendations on the Proposed Plan

Shortcomings with Preferred Alternative 5

In late 2013, the Agriculture Secretary Vilsack announced his intention to establish the Tongass Advisory Committee (TAC) to advise the Forest Service on how to expedite a transition to a timber program based primarily on young growth. Consistent with our past record of involvement, SEACC nominated our then-Forest Program Director for a seat on the TAC.² The agency chose other participants for the TAC.

We appreciate the time, effort, and commitment each of TAC participants invested in this process. Unfortunately, the Forest Service defined the TAC charter so narrowly that it prevented the TAC from taking a fresh look at how the Tongass fits into the big picture – to see the forest through the trees. Instead of evaluating how the Tongass National Forest should best address the challenges and opportunities facing both the region and the world in the 21st century, the agency focused the TAC's creative energy on the impossible task of maintaining a viable Tongass timber industry.

A. The Transition Drags on Too Long

We appreciate the steps taken by the Forest Service in the Proposed Plan to implement the growing consensus across Southeast Alaska that roadless-area logging is a thing of the past. Unfortunately, instead of facilitating the region's ongoing economic transition and addressing the region's realistic economic needs, the Preferred Alternative (Alt.5) calls for more old-growth clearcuts over the next 10 years than any alternative, except Alternative 1, the no-action alternative. *See* 2015 DEIS at 3-309. Since 1997, demand for Tongass timber has plummeted, with “[a]nnual harvest volumes average[ing] 36 MMBF between 2002 and 2014” *Id.* at 3-304. Instead of starting us down a new path, the Preferred Alternative perpetuates the conflict and controversy associated with Tongass old-growth logging by increasing the rate of Tongass old-growth logging in the next decade above the rate logged over the past decade.³

² *See* SEACC President Clay Frick to McMurren, Tongass Advisory Committee Coordinator (Jan. 29, 2014)

³ *Compare* Table 3.22-5, 2015 DEIS at 3-450 (Timber Harvest in Southeast Alaska by Ownership, 2002-2014) with Table 3.13-9, 2015 DEIS at 3-309 (Projected Timber Sale Quantity for Alt. 5 over next 10 years.) According to Alaska Region Offer-Cut-Sold 1994-2015, 57 mmbf was cut on the Tongass in 2015.

Since May 2010, when the agency announced its interest in “transitioning quickly away from [logging] in roadless areas and old-growth forests” on the Tongass, SEACC and others shared detailed concrete plans for accomplishing this transformation with the Department, Alaska Region, and Tongass National Forest.⁴ Specifically, we offered a Conservation Alternative to both the Forest Service and Tongass Advisory Committee (TAC) ending old-growth clearcutting in 5 years.⁵ The agency’s rationale for dismissing this alternative is arbitrary, inconsistent with the Secretary’s directive, and not based on the best available information. The nearly two-page discussion in the DEIS, however, gave interested members of the public plenty of opportunity to comment on this approach. DEIS at 2-7, 8. In addition, we understand that the Natural Resources Defense Council and Geos Institute submitted significant new inventory data and other information to the agency in support of this alternative. Please disclose this new information in the FEIS, update your analysis, and correct the mistaken assumptions made in the DEIS.

B. Purpose and Need Unreasonably Restricted Range of Alternatives

The agency threw a monkey wrench into the effort to expeditiously develop a more ecologically, socially, and economically sustainable Tongass timber program when it incorporated the unrealistic objective of “preserv[ing] a viable timber industry” into the Amendment’s purpose and need. See 2015 DEIS at 1-5. This politically-driven benchmark unreasonably constricts the range of alternatives considered for the Plan Amendment and ignores the realities confronting the timber industry in the 21st Century: the effects of past disproportionate logging (“highgrading”) of the most productive and economic Tongass timber stands; notoriously high production and labor costs; distance from markets; and, permanent and fundamental changes in global timber markets.⁶ Worse, the DEIS focused on the economic viability of the industry without taking a hard look at the ecological and social aspects of the Secretary’s direction. Today, timber represents only a tiny fraction of the Tongass National Forest economy. Although Southeast Alaska’s population and labor force grew from 2010 to 2014, the shrinking timber sector provides less than 1% of the jobs and total earnings.⁷

Instead of evaluating how the Tongass National Forest should best address the challenges and opportunities facing both the region and the world in the 21st century, the Forest Service focused the TAC’s creative energy on the impossible task of maintaining a viable Tongass timber industry. The TAC’s recommendations do not reflect the majority of comments

⁴ See Letter from Waldo to Regional Forester Pendleton (Dec. 29, 2010); Letter to Secretary Vilsack (Sept. 6, 2013); SEACC et al., to Forest Supervisor Cole (June 26, 2014)(joint Notice of Intent comments).

⁵ See Letter from SEACC et al. to Tongass Forest Supervisor Cole (Feb. 5, 2015). See also Letter from SEACC et al. to Tongass Advisory Committee (Feb. 9, 2015); SEACC et al., to Forest Supervisor Cole (Feb. 19, 2015)(meeting request to address Conservation Alternative in the Tongass Transition Framework); SEACC et al., to Forest Supervisor Cole (Mar. 5, 2015)(additional info on Conservation Alternative).

⁶ See Gilbertson & Robinson, *Natural Resources Mining and Timber, Alaska Economic Trends* (Dec. 2003).

⁷ See Southeast Conference, *Southeast Alaska by the Numbers 2015*; see also Alaska Editorial: A good thing going, *Juneau Empire* Feb. 18, 2016.

received by the TAC from interested communities, the general public, and a broad segment of the scientific community.⁸

C. Proposes Alterations to Fundamental Elements of Tongass-wide Wildlife Conservation Strategy.

The Preferred Alternative proposes wholesale changes that undermine fundamental elements of the existing forest-wide habitat conservation area strategy developed for the 1997 Revised Tongass Plan. Unlike that strategy, the product of rigorous interagency and independent scientific peer review, the Tongass Advisory Committee (TAC) did not base its recommendations on the best available scientific evidence or benefit from any credible scientific review. With no supporting scientific rationale, the Preferred Alternative unravels the critical functions performed by beach and estuary fringe, riparian habitat, and old-growth reserves, particularly in the very areas where high quality winter deer habitat is in short supply and deer numbers are insufficient to support hunter demand—both human and wolf. Logging young-growth for timber production within the reserve system, beach and estuary fringe, or Riparian Management Areas will affect the integrity of the Conservation Strategy by reducing functionality of these areas, reducing or fragmenting buffers, and increasing edge effects. We oppose proposed changes to Beach and Estuary Fringe (Beach), Riparian (RIP), Wildlife (WILD). *See* Proposed Plan at 5-8 (Beach); 5-9 (Riparian); 5-11 (Wildlife).

With no local experience or data, the TAC's assumptions about the ecological sustainability of proposed treatments are, for the Tongass, scientifically unproven. As important, the DEIS fails to explain the species-specific and cumulative impacts to the integrity of the conservation strategy or the efficacy of the original design criteria. While we understand the need to modify the strategy to account for impacts from the recent Sealaska lands bill, please explain why the Forest Service utilized the same criteria originally applied in 1997 instead of evaluating whether any changes are needed to achieve the same objective (viability) in the face of these significant changes in the amount, location, and value of remaining Tongass lands on Prince of Wales.

D. Application of 2001 Roadless Rule Requires Clarification

Chapter 1 of the DEIS states that “the Tongass has been subject to the Roadless Rule since 2011 and remains so today.” DEIS at 1-4. The framework for Alternative 5 states “this alternative would allow old-growth harvest only within Phase 1 of the timber sale program adaptive management strategy.” Since the Phase 1 portion of the timber base included some Inventoried Roadless Areas, please clarify that this statement only applies to the developed portion of the Phase I base.

Other Plan & DEIS Comments

⁸ *See* Letter from Doppelt et al., Federal Forest Carbon Coalition to Secretary Vilsack (Jan. 20, 2015); Letter from Alaback, Ph.D. et al to Forest Supervisor Cole (Dec. 4, 2014); DellaSala, Ph.D. et al. to Secretary Vilsack (Sept. 2014); Marvin, *What TAC isn't talking about*, Juneau Empire (Nov. 26, 2014); Letter from American Fisheries Society et al., to Secretary Vilsack (Jan. 20, 2015)..

A. Sweeping Changes to Existing Plan Transportation Direction Uncalled For.

From out of the blue, without ever identifying a need to change TLMP's transportation direction, the Proposed Plan makes sweeping changes to existing Tongass road management. Under all previous Tongass plans, each specific Land Use Designation (LUD), included LUD-specific standards and guidelines to protect wildlife and other forest values related to transportation. Though the Draft Plan and DEIS appear to say different things about the scope of the changes proposed, one interpretation of those changes could result in the effective elimination of all LUD-specific direction that limits or prohibits road construction for at least all major public highways, and, potentially, for any forest road, including logging roads. Such a radical change, if intended, would undercut critical land and resource protection standards and has not been analyzed in the DEIS. We object to this unnecessary and undesirable change to existing management direction and request that you clarify that any road, whether forest logging road or major transportation road, be subject to all LUD standards and guidelines. Although the agency appears in part to link these sweeping changes to some need to facilitate renewable energy development, its efforts are unavailing. First, the DEIS identifies no single renewable energy project or transmission corridor facilitated by this change.⁹ Second, the only project we know of that might benefit is the Soule River project – a large hydro development designed for export of Tongass renewable energy to Canada instead of reducing fossil-fuel use in Southeast Alaska. We oppose all of the new Transportation Systems Corridors Direction. See Proposed Plan at 5-13 to 5-15.

B. Significance of Changes to Tongass-wide Wildlife Habitat Conservation Strategy and Plan's Transportation Direction Require Plan Revision.

The changes to wildlife habitat conservation strategy and transportation management are significant enough to require revision instead of amendment. According to the Forest Service Manual:

The National Forest Management Act (NFMA) requires revision of land management plans at least every 15 years; however, a plan may be revised sooner if physical conditions or demands on the land and resources have changed sufficiently to affect overall goals or uses for the entire unit.

See FSM 1926.6 (2014).

C. Export-Driven Timber Program Unsustainable

The agency's continued reliance on an export-driven economic model fails to address the economic and social sustainability needs in the region. All transition alternatives should focus on creating jobs for Alaskans using Alaska wood by rewarding local value-added manufacturing. The transition also must end the market-distorting practice of allowing the export of taxpayer-subsidized Tongass timber to compete with logs sold by private landowners

⁹ See Proposed Plan at 5-13 to 5-15.

on the export market.¹⁰ The Tongass must shift rapidly from an old-growth dependent, export-driven timber program to a forest management industry that complements Southeast Alaska's vibrant commercial and tourism industries and maintains our unique Southeast Alaska way of life; an industry built to provide ecological restoration and stewardship services and provide wood products for local markets.

Last August, SEACC asked the Forest Service to conduct a forest-wide cumulative effects analysis of the Region 10 Limited Export Shipment Policy in this planning process.¹¹ Since the Regional Forester adopted the policy in 2007, it has undergone several, subsequent modifications. In 2008, the Regional Forester modified it to allow for international export of logs cut under particular timber sale contracts, if a premium payment was made. In November of 2009, the policy was further modified to cover additional timber contracts. The policy was again modified in 2012 to allow for over 50 percent of a sale's hemlock and spruce to be exported if a purchaser provided an equivalent amount of Alaska-cedar ("yellow cedar") to local small businesses. The DEIS explains that "the Limited Export Policy is intended to boost appraised timber values, provide economic sale opportunities for purchasers, and provide additional processing options for purchasers." DEIS at 3-453.

Despite our request, however, missing from the DEIS is any evaluation of the costs and benefits of the Limited Export Policy at all ecological, social, and economic scales. Has the appraised value of timber sales offered on the Tongass increased? Has local access to timber improved? How much yellow cedar has been retained for local manufacture? Has the policy increased the utilization of timber logged on the Tongass? Has providing a market for smaller diameter and low-grade material that local mills cannot process profitably improved sale economics? Has the policy resulted in the significant increase in likelihood that Tongass timber sales appraise positively? Is it a worthy trade-off for our region to pursue a policy that promotes export-oriented logging of the Tongass old-growth forests critical for the longevity and strength of Southeast Alaska's primary job producers – the \$2 billion dollar fishing, tourism, and recreation sectors – to maintain relatively few jobs in the timber sector?

These questions aren't just important locally; recent appropriation bills prohibit the Forest Service from advertising timber sales "where the indicated rate is deficit." See *e.g.*, § 410 of Consolidated Appropriations Act of 2016, H.R. 2029. Such an analysis would inform the public, agency decision-makers, and Congress with critical information about the wisdom of designing and appraising sales based on export values.

D. A Better Approach Needed to Foster a Sustainable Energy Future for Southeast Alaska.

¹⁰ See Letter from Loescher, President of Sealaska Corporation to Senator Ted Stevens (July 12, 1999)(unfair competition from subsidized Tongass timber); see also Letter from SEACC to Forest Supervisor Stewart (Aug. 13, 2015)(request for programmatic effects analysis for Region's modified export policy).

¹¹ Lindekugel, SEACC to Forest Supervisor Stewart (Aug. 13, 2015).

Chapter 5 of the Proposed Plan makes all Tongass lands potentially suitable for renewable energy sites. Proposed Plan at 5-12. It also defines “renewable energy site” to include access roads and transmission lines. *Id.* at 7-55. The DEIS explains these changes should make permitting less burdensome. *See* DEIS at 3-411.

SEACC strongly supports providing Southeast Alaskans with clean, affordable and reliable energy, particularly in small communities like Kake, which depend on isolated electric systems that run on high cost diesel. Development of community-based renewable energy solutions is the most effective approach.

We just don’t see the approach proposed by the agency as addressing the real problem. If the Forest Service is serious about helping small, diesel-dependent communities transition to renewable energy, it should invest agency resources to help them do so. The Forest Service could partner with these communities to assist with public meetings, consensus building, site surveys, feasibility determination and project selection. It could provide advice and resources to help these communities identify and implement energy efficiency and demand side management measures. Projects 5 MW or less, with minimal environmental impacts may qualify for a FERC exemption from licensing.

E. Agency Fails to Completely Identify Tongass Lands Not Suited for Timber Production.

The total lands suited for timber production (mapped suitable) in Row F of Table A-1 in the Proposed Plan is 593,252 acres. Please explain why you applied the Model Implementation Reduction Factor (MIRF) after you calculated “mapped suitable” (Row F) instead of at Row B (unmapped physical reasons) and Row D (unmapped resource reasons). Is this why the acreage actually modeled as “scheduled suitable acreage” (Row I) is 180,561 less than the estimated actual suitable (Row H)? What happened to those acres? *See* DEIS, Table 3.12-10 at 3-312.

According to the Proposed Plan, all forest lands within any of the development LUDs (Timber Production, Modified Landscape, and Scenic Viewshed) are suitable for timber production and included in the Projected Timber Sale Quantity (PTSQ). *See* Proposed Plan, TIM4A at 3-121 (Timber Production); 3-114 (Modified Landscape); and, 3-107 (Scenic Viewshed). Under Step 2 of the suitability analysis, all old growth stands:

“in Phases 2 and 3 of the 2008 Forest Plan Timber Sale Program Adaptive Management Strategy, in the Trout Unlimited TU77 watersheds, and in The Nature Conservancy/Audubon Priority Conservation Areas (as shown on maps in the planning record) are identified as NOT suitable for timber production, except for small sales after the transition is complete. Young growth stands in all of these areas are identified as suitable for timber production.”

Proposed Plan, Appendix A at A-4. According to Chapter 5, Appendix A satisfies the 2012 Planning Rule. *Id.* at 5-4. If so, then under Step 2, old-growth stands in Inventoried Roadless Areas and TU77 watersheds are no longer suitable for production of saw timber.

Both the 2012 Planning Rule and the 2015 Amendments to the Forest Service Handbook direct the Forest Service to identify timber lands that are not compatible with the achievement of desired conditions and objectives established by the plan for those lands as not suited. *See* 36 C.F.R. 219.11(a)(1)(iii)(2014); FSH 1909.12_61.2 (2015). Therefore, all lands not suitable for timber production in existing development LUDs should be reallocated to non-development LUDs.

In describing attributes of lands in the suitable land base, the DEIS explains that “[a]ll alternatives can access timber in Phase I . . .” DEIS, Appendix B at B-5. Please clarify that this statement does not apply to Inventoried Roadless Areas in Phase 1.

NFMA requires forest plans to set cutting limits and identify which lands are not suited for timber production, considering physical, economic and other pertinent factors.

On the one hand, the agency kept the proposed amendment narrow by declining to remove roadless wildlands and other areas of long-time importance to local residents from existing development LUDs. Yet, the Forest Service proposes replacement of the existing Transportation and Utility System LUD that reflects consideration of competing multiple uses with an “all-build” direction for Transportation Systems Corridors. Please explain why the former is too extensive to accomplish within the framework of this amendment, but the latter is not.

We recommend the agency remove all unsuitable lands from the Development LUD Group in the FEIS. By so doing, the agency can assure the public that the Projected Timber Sale Quantity is consistent with all plan components. Taking such steps during this amendment process is also compatible with Handbook direction: “For a plan amendment, the Responsible Official may conduct a review of land suitable for timber production if relevant to the issues of the amendment.” FSH 1909.12_61. Since the purpose and need for this amendment “demands the transition to a predominately young-growth based industry and the reduction of old-growth [logging],” DEIS at 2-9, the complete removal of old-growth forest stands not suitable for timber production from the Development LUD Group is appropriate. Neither the public nor agency must await a Plan Revision before removing these unsuitable acres from the timber base.

F. Clarify old-growth habitat reserve modification procedures.

In comments on the 5-year review, the USFWS asked the Forest Service to clarify “criteria for small OGRs” (emphasis in original) to state that “**Alternative small reserves must provide comparable conservation value, with respect to site specific factors named in Appendix D in the final [2008] FEIS with each VCU**” and modify management prescription for Old-Growth Habitat LUD (WILD1) to read: “**Alternative reserves must provide comparable achievement of the Old-growth Habitat LUD goals and objectives within each VCU.**” We could not find the recommended clarifications and modification. Please explain why not.

G. Object to Changes to Forest-wide Multiple-use Objective for Timber

We object to the proposed O-TIM-01 because it essentially turns the planning cycle demand projection of 46 mmbf into an annual timber target. *See* Proposed Plan at 5-16. Daniels et al. (2015) derived the baseline demand projection using the same methods used for making past projections – projections that overstated actual cut levels on the Tongass significantly. In fact, the Forest Service knows that actual cut levels will differ from its baseline projections:

The basic approach is to allow the industry to accumulate an adequate volume under contract (i.e., a measure of inventory), then monitor industry behavior and adjust timber program levels to keep pace with harvest activity. Key economic indicators and stumpage market conditions are also monitored.

DEIS, Appendix G at G-2. Thus, the Forest Service knows that the predicted timber objective for the Proposed Plan is unlikely to occur. It then compounds the error by essentially making the planning cycle projections offered by Daniels et al. (2015) equivalent to meeting “annual market demand.” Such action is arbitrary and violates the Tongass Timber Reform Act.

H. Page-specific comments

DEIS at 3-265: incorrect potential entitlement for 5 new urban Native corporation – total acres is 115,000, not 184,320

Proposed Plan at 5-6, SUIT-YG-01 – As the dominant strategy for managing young growth forests within old-growth habitat reserves, the Forest Service needs to develop an “old-growth restoration” management prescription that has been scientifically well vetted with a blue-ribbon panel of experts.

Proposed Plan at 5-9 & 10, (RIP) -- No logging of young growth in Riparian Management Areas (in or outside TTRA buffers) other than for habitat enhancement (e.g., to accelerate stand development toward old-growth conditions). One of the key processes and characteristics of old growth that is critical for the riparian zone is the creation of coarse woody debris inputs to streams which create diverse and structurally important habitats for aquatic invertebrates and fish. Using wide spaces in thinning treatments can more quickly grow large trees, which would provide these critical structures.

SEACC’s Key Recommendations for the Proposed Plan.

First, the Proposed Plan should facilitate a more rapid transition of the timber industry away from its current structure and configuration to one that sources most of its timber from young growth and produces finished, high value-added products in-state for local and regional

markets. The new Tongass timber program would limit old-growth logging to micro and small sales that feature 100% in region processing within 5 years.

We caution the Forest Service – not all young growth logging is a panacea for lost timber production because the sustainability of young growth forests is mostly scientifically unproven. Some of these forests, particularly on the highest productivity sites, should be restored to their natural condition over the short and long-term for wildlife. The Forest Service must make sure additional monitoring and research confirms that proposed management of young growth forests achieves the long term biological sustainability of those forests.

Second, SEACC urges the Forest Service to shift its spending priorities away from timber sale development and road construction towards investments that:

- Improve wildlife habitat, particularly those projects that mitigate impacts from past clear cutting on subsistence deer hunting;
- Restore damaged watersheds by repairing culverts that block fish passage, restoring streams and wetlands, and closing unneeded and environmentally harmful roads; and,
- Address unmet needs of tourism, recreation, and commercial and sport fishing and hunting users.

Third, consistent with our long history of “place-based” Tongass conservation advocacy, the proposed TLMP must safeguard all salmon strongholds on the Tongass and focus forest stewardship activities on maintaining and enhancing deer habitat capability.

We’ve identified those lands identified by the Forest Service as suitable for old-growth and young-growth logging in Alternatives 2-5 which we recommend be removed from the timber base,¹² managed primarily for restoration,¹³ and others we recommend for special management.¹⁴ Areas recommended for restoration should be restored to their natural condition over the short and long-term. This involves closing all roads and fixing damage to stream banks and other natural features. Areas recommended for special management would allow continued logging but prohibit clearcutting and other even-aged management. In addition, no new roads would be permitted, except for spur roads which extend less than one-quarter of a mile from an existing road. These areas should be prime candidates for a microsale program designed in collaboration with local communities.

Best Regards,



Buck Lindekugel
Grassroots Attorney

¹² VCUs 4000, 4020, 4190, 4210, 4520, 4680, 5280, 5290, 5300, 5320, 5360, 5730, 5940, 6370, 6740, 7610, and 7630

¹³ VCUs 560, 2020, 2040, 2200, 2390, 2960, 2970, 3630, 3640, 3730, 4470, 4500, 4890, 5460, 5871, 5880, 6790, 7330, and 7370.

¹⁴ VCUs 1180, 1190, 1200, 2080, 2090, 2170, 2180, 2300, 2330, 2340, 2360, 2430, 2440, 2920, and 2930.

LIST OF EXHIBITS, SEACC COMMENTS ON
2015 PROPOSED TONGASS PLAN & DEIS

1. SEACC President Clay Frick to McMurren, Tongass Advisory Committee Coordinator (Jan. 29, 2014)
2. Alaska Rainforest Campaign on ANPR and Draft Interim Suspension of Road Building in IRAs (Mar. 30, 1998).
3. SEACC Scoping Comments on EIS Supporting Roadless Rule (Dec. 20, 1999)
4. SEACC on Proposed Rule & Policy on Management and Development the National Forest Transportation System (May 17, 2000).
5. SEACC Comments on Roadless Area Conservation DEIS (July 17, 2000).
6. SEACC Comments on Proposal to Exempt Tongass from Roadless Rule (Sept. 2, 2003)
7. Alaska Region Offer-Cut-Sold 1994-2015 (Feb. 1, 2016)
8. Letter from Waldo to Regional Forester Pendleton (Dec. 29, 2010)
9. SEACC et al., to Secretary Vilsack (Sept. 6, 2013)
10. SEACC et al., to Forest Supervisor Cole (June 26, 2014)(joint Notice of Intent comments)
11. SEACC et al. to Tongass Forest Supervisor Cole (Feb. 5, 2015)
12. SEACC et al. to Tongass Advisory Committee (Feb. 9, 2015)
13. SEACC et al., to Forest Supervisor Cole (Feb. 19,. 2015)(meeting request to address Conservation Alternative in the Tongass Transition Framework)

14. SEACC et al., to Forest Supervisor Cole (Mar. 5, 2015)(additional information on Conservation Alternative).
15. Gilbertson & Robinson, Natural Resources Mining and Timber, Alaska Economic Trends (Dec. 2003)
16. Southeast Conference, Southeast Alaska by the Numbers 2015
17. Alaska Editorial: A good thing going, Juneau Empire (Feb. 18, 2016)
18. Letter from Loescher, President of Sealaska Corporation to Senator Ted Stevens (July 12, 1999)
19. SEACC to Forest Supervisor Stewart (Aug. 13, 2015)(programmatic effects analysis needed for Alaska's Region's Modified Export Policy).
20. Letter from Doppelt et al., Federal Forest Carbon Coalition to Secretary Vilsack (Jan. 20, 2015)
21. Letter from Alaback, Ph.D. et al to Forest Supervisor Cole (Dec. 4, 2014)
22. DellaSala, Ph.D. et al. to Secretary Vilsack (Sept. 2014)
23. Malena Marvin, *What the TAC isn't talking about*, Juneau Empire (Nov. 26, 2014)
24. Letter from American Fisheries Society et al., to Secretary Vilsack (Jan. 20, 2015)