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**Subject:** Objections to Tongass land Management Amendment  
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Objections to Plan Amendment:  
Projected Timber Sale Quantity  
Fall down acres of young growth harvest  
Economic Viability

My objections are based on the reason for the amendment as spelled out in the Final EIS and in Secretary's Memorandum 1044-009.

"USDA is equally committed to doing its part to ensure that the communities within and adjacent to the Tongass National forest are economically vibrant"

"Moreover, we must do this in a way that preserves a viable timber industry that provides jobs and opportunities for the residents of Southeast Alaska"

"this Memorandum affirms that his 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"

"it is important to retain the expertise and infrastructure of the existing industry"

"requires a reliable supply of economically viable timber,..."

I contend the Tongass National Forest plan amendment will do none of the above and will result in the bankruptcy and the closing of all major timber operators on the Tongass dependent on timber from the Tongass National Forest. Due to the plan amendments inability to any degree of certainty to accomplish the above points in the Secretary's Memorandum and the reason for the amendment as stated in the final EIS, the plan amendment should be delayed until such time the above quotes and can reasonably met with a plan amendment.

Projected Sale Quantity: The premise in the EIS is the USFS will produce in timber sale the plan amendment of 46 mmbf per year, SE Alaska will have a viable timber industry. The Projected timber Sale Quantity is the volume required to meet demand less timber volume supplied by native corporations and State of Alaska. This is shown in Table 3.22-9. State Of Alaska sustained timber sale volume is 12 mmbf per year. I have to assume the Mental health trust and the University of Alaska has to make up the differential. State volume in the table ranges from 17.8 mmbf to a high of 23.3 mmbf in 2030. The University of Alaska has a minimal amount of economically viable timber that is not under contract. For SE it is estimated at less than 10 mmbf. Without a land trade with the USFS, Mental Health trust has no economically viable timber that is not in hugely controversially areas,

Deer Mountain in Ketchikan and Petersburg. The probability to harvest these two parcels is low. State of Alaska legally sustained volume over the next 15 years is 192 mmbf. This means University and Mental health Trust have to operate 140.4 mmbf over the next 15 years. This is not possible with their current land holdings.

Table 3.22-9 has native timber volume of 60.9 in year 2015 ramping up to 80.2 in 2030. STC is the only native corporation harvesting timber at the current time. All other native corporations old growth timber has been harvested except for Haida Corp who has timber in the Hydaburg watershed and in a high value fish stream area they have elected not to harvest timber in. There has been no indication in the industry from any of the other village corporations they have any timber to harvest over the next 15 years. This leaves STC as the only native timber volume. They have stated to the public and their shareholders STC will harvest 45 mmbf per year in a sustained manner to stretch their new timber holdings out long enough for their young growth to come of age in 30 years. This leaves a 458 mmbf deficit over the next 15 years for native timber supply. Add the 140 mmbf deficit of State and you have 598 mmbf over 15 years or 40 mmbf per year deficit in the timber supply demand as calculated by the USFS. As stated in the Appendix G, the USFS is making up the difference in supply between the demand and the timber supplied by the State and Natives over the next 15 years. The USFS therefore has to increase their Projected Sale Quantity by an additional 40 mmbf per year.

The basis of the plan is the 46 mmbf per year will maintain a viable industry at today's harvest level. This can not be, as per the EIS we have seen continual decline in timber workers since 2002. Timber under contract has been declining. Sawmills have closed. Populations in SE have declined. Unemployment in SE is higher than state average. Wages growth has been less than state average. All economic indicators for SE Alaska and for the timber industry points to a death spiral. Timber companies have cut back on capital expenditures. You can not maintain the existing industry and have a viable industry upon transition when all the economic indicators are showing a declining timber industry if you only maintain the past average timber sale volumes.

Fall down Acres: According to the EIS the USFS has planned on a level of fall down acres. I could not find in the EIS how much has been allowed. History has shown the fall down is much higher than USFS estimates with fall down in old growth timber sales 70 percent based on a paper by the Working Forest group. Most of the fall down will occur in the older young growth stands that have to be used as the transition timber sale volume. Until a cruise is completed fall down acres will be a guess at best. The minimal amount of older young growth will not allow for a guessed fall down acres. The plan has to produce "reliable supply of economically viable timber". With only 251,000 acres of young growth in the timber LUD, a viable timber industry can not be sustained with even a minimal percentage of the base timber acres as fall down.

#### Economically Viable timber:

USFS has not sold enough Young growth to have reliable data on harvesting costs across the forest and markets for the young growth logs or lumber. In order to insure a reasonable probability of the forest industry surviving this plan amendment transition the USFS has to have more actual harvesting, transportation and market information on young growth. They have no actual cable harvesting costs on Young growth. The only harvesting cost collected to date is on a thinning. Only two small high volume per acre, pre-roaded, young growth sales have sold. These will not be

representative of the average young growth stands over the next 10 years. More young growth sales have to be sold and operated for the USFS and the industry to understand the costs and markets of young growth. Economically viability is at best a guess. We can not invest in a forest industry with so much uncertainty. With no additional investment the transition will fail. Page ES-12 'criteria for meeting viable industry of 46 mmbf per year has a high degree of uncertainty'. When the USFS states in the EIS the transition is so uncertain than how is an industry going to banked and take the risks to make a transition happen. In the end the industry will fail and the communities of SE Alaska suffer the economic loss.

The plan amendment fails to insure the industry will survive. The reasons for the amendment per the EIS is based mostly on Memorandum 1044-009 and this plan amendment fails to satisfy the timber volume both in demand and fall down. It has no reliable economic data to insure young growth will be economically viable to harvest, market and produce any reasonable quantity of lumber to support a mid sized sawmill. SE Alaska does not have a pulp mill, a chip n saw mill and a modern sawlog mill to produce young growth timber competitively with the rest of the world. The probability of losing the timber industry is too high to sign the plan amendment until additional reliable data is collected.

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