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Attn: Tongass Objections

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This is to object to the Tongass Plan Amendment. The plan as presented does not solve basic problems that make it impossible for the Forest Service to offer economic timber sales. The Forest Service has created constrains on timber sales to address appeals, lawsuits and ecosystem management that have destroyed any chance that an offering will be economic. Timber harvest has become a byproduct of all the other multiple use mandates on the forest. Until the

prescriptions are modified so that the units prepared for timber sales are not deficit the industry will continue to shrink and eventually disappear.

A good example of this problem is the current Wrangell timber sale Draft EIS that has all deficit alternatives. The visual requirements are not only adding cost they are reducing the amount of volume that will be available for the sale. The system road requirements are adding \$500,000 costs to the sale. A nine tenth mile recreation site access road adds \$174,000. When alternatives are deficit there should not be cost added to timber sales that should be charged to the multiple use being served. The visual constraints must be limited to the value of the timber harvested. If the timber can be roaded the constraints must be limited to cover the cost and profit and risk margin and the volume harvested must be great enough to amortize the road cost. The areas subject to the visual restraints should be dropped from the timber base as there will not be enough value to provide for another entry because it will take several 100 years to grow economic timber if ever.

The roadless rule is a large part of the deficit sale problem. The amendment seems to recognize the problem but has a preferred alternative that will not change the existing rule. This is another example of a constraint that must be addressed if there is to be a timber industry for managing the Tongass. The areas withdrawn by the roadless rule is another reason why the Forest Service is no longer able to offer economic sales. To restrict use of areas that have been roaded during the exemption of the rule makes no sense. These areas no longer have the characteristics necessary for a Roadless designation and should be included in the timber base as a timber management LUD. A redetermination of the areas included in the roadless category must be reevaluated on the basis of what the need for timber management areas is in order to maintain a viable industry. The approach used to create the existing areas was done by addressing all the other multiple uses and as stated above leaving the residuals of those designations for timber management.

The amendment not only continues a plan that has created a failed timber sale program it is mandating another nail in the

timber industry coffin by forcing a transition out of old growth timber into uneconomic second growth. This transition has not been evaluated to determine if the timber is economics and if there is enough to provide for a sustainable viable industry. Studies to date have not done a good job of inventorying the timber so that economics and quantities can be determined. Until this is done there should be a continuation of an old growth timber sale program that maintains the existing timber industry and provides for expansion and creation of an integrated industry so that the transition when the time is right will have the infrastructure necessary to make the transition a success. The demand calculation used to determine annual demand must be revised to allow for the continuation of an old growth program that will allow for expansion of the existing industry and restoration of an integrated industry.

One way to address the problem with the plan is to create a Land Use Designation dedicated to regeneration cutting practices under the State Forest Management Act. This would result in producing economic sales and creating the additional

second growth timber that will be needed to have a successful transition to second growth.

Thank you for the opportunity to comment on this plan amendment that will define the future of the timber industry and the ability of the Forest Service to manage the Tongass.

SINCERELY,

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