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Beth Pendleton, Regional Forester
USDA Forest Service, Alaska Region
Attn: Tongass Objections
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VIA ELECTRONIC MAIL

August 30, 2016

Re: Objection to 2016 Amended Tongass Land Management Plan

Dear Ms. Pendleton:

Pursuant to 36 C.F.R. Part 219, Defenders of Wildlife (Defenders) hereby objects to the June 2016 Amended Tongass Land Management Plan (2016 Amended Forest Plan), the associated Final Environmental Impact Statement (FEIS), and the proposed Record of Decision (ROD). M. Earl Stewart, Tongass Forest Supervisor, is the responsible official for the 2016 Amended Forest Plan, FEIS and proposed ROD.

Established in 1947, Defenders is a national, science-based non-profit conservation organization. With more than one million members and supporters nationwide, Defenders is focused on conserving and restoring native species and habitat throughout the country, including on national forests such as the Tongass.

Defenders has also joined the more detailed objections submitted by Earthjustice and other groups (“Earthjustice comments”) that detail substantial additional concerns with the 2016 Amended Forest Plan and supporting analyses. We object separately here in order to offer specific suggestions for the Forest Service to consider adopting as it works to finalize the 2016 Amended Forest Plan, FEIS, and ROD.

Objection 1: The 2016 Amended Forest Plan Fails to Actually Limit Old-Growth Logging.

Given that the purpose of the amendment is to expedite a transition out of old-growth logging on the Tongass, it is perplexing that the amendment fails to actually do so. While the envisioned timber harvest calls for slowly increasing the percentage of second growth timber and slowly decreasing the percentage of old growth timber, there is no enforceable limit placed on the acreage or board feet of

old growth timber to be harvested. If market conditions or other external factors change, there is no commitment not to ramp up old growth logging. If the goal of the amendment is to ensure that old-growth logging substantially decreases, as was the charge in Agriculture Secretary Vilsack's 2013 memo that triggered the amendment, then the amendment should actually ensure that.

The Forest Service does state that “young-growth volume will replace old-growth volume over time as rapidly as the economic availability of young-growth allows.”¹ Thus the plan direction is to replace old-growth volume with young-growth as fast as economically possible, and *not* to increase old-growth logging, whether in response to market conditions, young-growth stand status, or other factors. The 2016 Amended Forest Plan somehow leaves out the commitment to decrease, not increase, old-growth logging. We urge the Forest Service to make this clear intent explicit.

Suggestion 1: Add an enforceable maximum old growth harvest limit to the 2016 Amended Forest Plan. That limit should be no higher than the difference between the second-growth harvest and actual demand (or the 46 million board feet projected demand, whichever is less).

Objection 2: The 2016 Amended Forest Plan Allows High-Grading of High-Volume Old Growth Stands.

High-volume Productive Old Growth (POG) forest areas are rare, of very high value for wildlife, and have been disproportionately logged on the Tongass in the past (i.e., a much higher percentage of total high-volume POG has been logged than POG). For example, high-volume POG on north Prince of Wales Island has been reduced by as much as 94%.²

Scientists have long pleaded for the Forest Service to protect the high-volume stands of old growth on the Tongass because of their importance to maintaining viable, well-distributed wildlife populations on the forest. The Alaska Chapter of The Wildlife Society has urged the Forest Service toward a “proportionality” approach to harvesting habitat types since 1979. The 21 independent scientific peer reviewers of the Viable Population Committee (VPOP) of scientists who crafted the original 1997 conservation strategy recommended that the Forest Service “not further fragment existing large blocks of high-volume old growth and do not differentially cut low altitude, high-volume old growth.”³

Unfortunately, the Forest Service did not adopt these recommendations, leading 11 of the peer reviewers to conclude “we do not believe that [the 1997 Tongass Land Management Plan] will protect viable, well-distributed populations of vertebrate species on the Tongass National Forest.”⁴

Commenters on the proposed 2016 amendment again requested that the Forest Service distinguish between high-volume POG and POG for harvest planning purposes and stop the disproportionate harvest of high-volume POG. This would benefit old-growth associated wildlife species and preserve natural habitat diversity on the forest, especially since the high-volume POG is very rare and already disproportionately logged.

¹ FEIS Appendix I at 34.

² DEIS Comments of John Schoen, Ph.D., (“Schoen comments”) at 7.

³ See Schoen comments at 5-6.

⁴ See Schoen comments at 6.

The Forest Service's response to this was as follows:

The 94 percent (Albert and Schoen 2013) large-tree reduction since 1954 pertains to high-volume stands which are defined differently by Albert and Schoen (2013) than large-tree for the Forest Service analysis. Further, this reduction is true of the existing condition, not a result of this plan amendment.

The Forest Service calculates present high-volume and large-tree POG in the North Central Prince of Wales province to be 54 and 50 percent of original volume, respectively.⁵

Thus, while the response identifies definitional differences among different calculations of POG, it does not question the main point of the comment. The response agrees with the contention that high-volume POG has been disproportionately logged on the Tongass; the only fact in question is exactly how much of that high-volume POG remains. It is undisputed that the continued high-grading of high-volume old growth forest will be allowed under the 2016 Amended Forest Plan.

The FEIS fails to explain how continuing to high-grade the remaining high-volume POG on the Tongass is consistent with the Forest Service obligations to protect habitat diversity and ensure wildlife viability, or consistent with the purpose and need for the amendment. Indeed, high-grading these habitats is incompatible with the goal of maintaining the natural range of habitat diversity across the forest.

Suggestion 2: Given the fact that high-volume POG has already been disproportionately harvested for decades, the 2016 Amended Forest Plan should prohibit logging in the remaining high-volume POG stands. At minimum, the 2016 Amended Forest Plan should require some measure of proportional logging of POG forest types; it should prohibit the high-grading (disproportionate logging) of the remaining high-volume POG on the forest.

Objection 3: The 2016 Amended Forest Plan allows for the continued clearcutting of old growth forests.

Despite the purpose of the amendment to transition away from old growth logging and an outpouring of comments from thousands of scientists urging the Forest Service to end the anachronistic practice of clearcutting old growth, the 2016 Amended Forest Plan simply maintains the status quo, placing no limit on old growth clearcutting whatsoever.

Letters from over 275 scientists and seven of North America's most prestigious scientific societies (representing a combined membership of over 30,000 scientists and natural resource professionals) urged the Forest Service to not clearcut any more old growth on the Tongass.⁶ In response, the FEIS states that the "silviculture prescriptions, such as clearcutting or thinning, are not decided at the Forest Plan level. Therefore, a justification for clearcutting is not required. Any clearcut prescriptions at the project level will have a justification at that time."⁷

⁵ FEIS Appendix I at 44.

⁶ See Earthjustice comments for detailed description of broad scientific recommendations to stop clearcutting old growth forests in the Tongass and beyond.

⁷ FEIS Appendix I at 38.

The point of the comments, though, was to urge the Forest Service to change the status quo and make the decision at the Forest Plan level to stop clearcutting old growth. Simply restating the status quo ignores the issues raised in the comment letters. We understand that up until now, decisions on silvicultural prescriptions including clearcutting old growth have been made at the project level. We are asking you to change that.

Suggestion 3: The 2016 Amended Forest Plan should eliminate clearcutting in old growth forest habitat on the Tongass. At minimum, the Plan should provide direction that clearcutting old growth shall be minimized to the greatest extent possible, and is not generally anticipated to occur at the project level under normal circumstances.

Thank you for your consideration of these suggestions.



Patrick Lavin
Alaska Representative