



August 30, 2016

Beth Pendleton, Regional Forester
USDA Forest Service, Alaska Region
Attn: Tongass Objections
P.O. Box 21628
Juneau, AK 99802-1628

objections-alaska-regional-office@fs.fed.us

Dear Regional Forester Pendleton,

Please accept these objections submitted on behalf of Trout Unlimited (TU) to the draft Record of Decision (draft ROD) and Final Environmental Impact Statement (FEIS) for the Tongass National Forest Land and Resource Management Plan Amendment (Forest Plan Amendment), which was prepared by Earl Stewart, Forest Supervisor of the Tongass National Forest.

At the outset, we wish to make clear that we commend the Forest Service and its staff for the leadership it has shown in developing this proposed Forest Plan Amendment. We recognize the significant improvements made to the proposed Forest Plan Amendment since the Draft Environmental Impact Statement (DEIS) and are very excited at the prospect of an amendment that facilitates a more rapid transition out of large-scale old-growth logging while increasing protections for important fish and wildlife habitat. TU is hopeful the proposed Forest Plan Amendment will bring management of the Tongass into better alignment with the needs of the region and help ensure more sustainable management of the Tongass in the future. Identifying high-value fish and wildlife habitat, including Tongass 77 watersheds, as NOT suitable for timber production is a significant step toward placing fish, wildlife and recreation on a more even footing with traditional extractive industries, and we recognize the valuable work of the Tongass Advisory Committee (TAC) and the Forest Service in recommending these protections and including them in the proposed Forest Plan Amendment.

TU is the nation's largest sportsman's organization dedicated to coldwater conservation with more than 400 chapters and more than 140,000 active members nation-wide. TU has more than 1,000 members and tens-of-thousands of additional supporters in Alaska that are passionate anglers, lodge owners, fishing and hunting guides, and commercial fishermen, among other various occupations. In addition to members in more remote parts of the state,

Trout Unlimited: America's Leading Coldwater Fisheries Conservation Organization

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TNF Plan Amendment

TU has active chapters in Juneau, on the Kenai Peninsula, Anchorage and the Mat-Su, and in Fairbanks. Many of TU's members rely on the important fish, wildlife and water resources found on the Tongass for fishing, hunting, recreation, and for employment in related industries such as fishing and tourism. TU's membership includes commercial fishers, Alaska Natives, small business owners, and Alaskans from a variety of walks of life.

TU has a long history of working collaboratively with the Forest Service and other stakeholders on the Tongass and elsewhere throughout the National Forest System. This partnership is critical to TU and to its ability to fulfill its mission. TU is committed, through the investment of significant staff and financial resources, to protecting and restoring important fish, wildlife and water resources on the Tongass, and to ensuring the region's unique wild salmon resources continue to serve as the economic, cultural and spiritual foundation of Southeast Alaska.

Tracking the arc of the proposed Forest Plan Amendment, what started in 2010 as a lofty and aspirational vision that prompted more questions than answers, is evolving into a refined proposal with achievable goals. While TU has always believed that a transition was inevitable for Southeast Alaska and for the Tongass—in fact, most of the region transitioned long ago—we have occasionally wondered whether the Forest Service would accomplish its transition in a way that is sensitive to local communities, that ensures important fish and wildlife and their habitat remain productive for generations to come, and that maintains the productivity and functions of the forest that are essential to Southeast Alaska's important fishing and tourism economies. Today, we are excited for the proposed Forest Plan Amendment and hopeful that it will set the Tongass on a course that promotes sustainable management of forest lands while also meeting the ever-changing needs of the region.

By improving protections for important fish and wildlife habitat and enhancing visitor services, the Forest Service can increase its support for Southeast Alaska's rural communities and be responsive to the needs of the region. By ending its large-scale old-growth timber sale program—which undermines the region's largest job-producing industries, causes unnecessary and irreparable harm to important fish and wildlife habitat, and is an antiquated program that would not exist if not for massive taxpayer subsidy—the Forest Service can establish a legacy of public service and support for local communities that will remain for generations to come.

I. Salmon are the Tongass' most Important Forest Product

The Tongass is the nation's top salmon-producing forest. Sport, commercial and subsistence fishing of Tongass salmon contributes \$1 billion annually to the regional economy and accounts for 10% of Southeast Alaska's employment.¹ In addition to this, more than a

¹ TCW Economics, *Economic Contributions and Impacts of Salmonid Resources in Southeast Alaska*, prepared for Trout Unlimited Alaska 16 (July 2010), available at <http://www.tu.org/sites/www.tu.org/files/documents/EconReportFull.pdf>. The number of jobs supported by salmon fishing and its economic contribution are likely to be even greater today than was indicated since these figures were calculated using data from 2007 and the economy and salmon prices have continued to increase in years since.

million out-of-state visitors flock to the Tongass each year, contributing another \$1 billion annually and accounting for another 15% of regional employment.² These industries—which have their foundation in healthy watersheds, in-tact fish and wildlife habitat, natural scenic beauty and untouched landscapes—depend heavily on the Tongass National Forest, which accounts for roughly 80% of the region’s land base and produces 79% of the regional salmon catch.³

Fishing and tourism far outpace other private-sector sources of employment and earnings, and provide a steady and reliable source of employment and earnings for many Southeast Alaskan communities. Despite decreases in Southeast Alaska’s timber industry, Southeast Alaska’s population *increased* 7 percent from 2000 to 2012 and personal income *increased* by 17 percent over the same period.⁴ Per capita income for Southeast Alaskans outpaces statewide and national averages while unemployment rates remain lower than statewide or national averages.⁵ Southeast Alaska’s economy remains strong, and is buoyed by its healthy fish and wildlife habitat, productive salmon streams and scenic beauty. Managing the Tongass with fish, wildlife and visitor services at the forefront is the key to ensuring local communities and economies are strong and stable.

II. High-Value areas Should be Identified as NOT Suitable for Timber Production

Various areas have been identified as especially important for fish and wildlife, and should be identified as NOT suitable for timber production. These areas include: (1) the Tongass 77 watersheds; (2) Conservation Priority areas identified by the Audubon/TNC Ecoregional Conservation Assessment; (3) existing inventoried roadless areas; and (4) the existing network of old-growth reserves (OGRs). TU thanks the Forest Service for recognizing the great importance of the Tongass 77 and Audubon/TNC Conservation Priority areas, and for identifying them as NOT suitable in the proposed Forest Plan Amendment. As recognized by the TAC and the thousands of Southeast Alaskans that spoke out in favor of protecting important fish and wildlife habitat during the various comment periods leading up to development of the draft ROD, these areas are hugely important to Southeast Alaskans and local communities, and protecting these areas from future development is central to the Forest Service’s ability to maintain ecological function of the forest and meet the socioeconomic needs of the region.

The Tongass 77 watersheds (which originally numbered 77 before being reduced to 73 due to intervening legislation and subsequent revisions) are the “best of the best” from the thousands of salmon and trout watersheds on the Tongass. These watersheds were identified

² McDowell Group, *Economic Impact of Visitors to Southeast Alaska 2010-11*, prepared for Alaska Wilderness League 1 (Aug 2012).

³ U.S. Forest Service, *Tongass Salmon Factsheet 1* (Jun 2013), available at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5408056.pdf.

⁴ USDA, *Tongass Land and Resource Management Plan Final Environmental Impact Statement Plan Amendment*, R10-MB-769e at 3-478 (June 2016), *hereinafter* FEIS.

⁵ FEIS at 3-478 to 479.

through a comprehensive process where researchers from the Alaska offices of the Audubon Society, The Nature Conservancy and Trout Unlimited, in consultation with federal and state biologists and various community and business stakeholder groups, used existing data and state-of-the-art GIS and conservation planning software to identify the most important salmon-producing watersheds that lacked watershed-scale protections. Now narrowed down to 73 watersheds comprising nearly 1.9 million acres, the Tongass 77 watersheds form the foundation of Southeast Alaska's salmon fishery and the local economy.

Like the Tongass 77 watersheds, Conservation Priority areas identified in the Audubon/TNC Eco-regional Conservation Assessment also are hugely important to local fish and wildlife populations. These areas were identified through a thorough peer-review process conducted by scientists from Audubon Alaska and The Nature Conservancy.⁶ These areas are the most ecologically valuable areas for a diverse array of plant and animal species and their conservation is essential to the ecological health and function of Southeast Alaska.

In addition to the Tongass 77 watersheds and Conservation Priority areas identified by the Audubon/TNC assessment, inventoried roadless areas identified through the 2008 forest plan amendment and the existing network of old-growth reserves are hugely important and are vital for maintaining the integrity of the existing conservation strategy. The current network of small, medium and large old-growth reserves must be maintained to ensure viable populations of important species. The reserve network encompasses tracks of relatively undisturbed land, or land that is intended to return to an old-growth status, and is designed to provide sufficient habitat to maintain viable populations of important species.

Fish and wildlife, and Southeast Alaska's broad expanses of untracked land and scenic beauty, are the underpinnings of our local economy, culture, and community. Salmon and trout—and the communities, cultures and economies they sustain—require clean, healthy watersheds for spawning, rearing and migrating. Based on the outstanding fish habitat values in Tongass 77 watersheds and their incredible importance to local communities and the region's economy, these watersheds should be protected from further development, identified as NOT suitable for timber production and managed with wild fish production as the top priority. We appreciate the Forest Service's leadership in recognizing these important areas and in identifying them as NOT suitable for old-growth timber production in the proposed Forest Plan Amendment. This provision—along with increased protections for the Audubon/TNC Conservation Priority areas—is the cornerstone of the proposed Forest Plan Amendment and mark a significant step toward aligning Tongass management with the needs of the region.

⁶ Albert, D. M., and J. W. Schoen, *A conservation assessment for the coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest* In A Conservation Assessment and Resource Synthesis for the Coastal Forests & Mountains Ecoregion in Southeastern Alaska and the Tongass National Forest. eds J. W. Schoen, and E. Dovichin. Audubon Alaska and The Nature Conservancy (2007), available at <https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx>.

III. The Forest Service Should Rapidly end Industrial-Scale Old-Growth Logging.

In many regards, Southeast Alaska has already transitioned. Logging and milling of Tongass timber supports very few private sector jobs.⁷ Even when timber from private and state lands is included, the timber industry in Southeast Alaska still accounts for just a few hundred jobs.⁸ It is past time for the Forest Service to catch up with the rest of the region and the nation and shift its Tongass timber program to one that plans and implements appropriately-scaled timber sales that support the region's small mills and encourage local manufacturing of young-growth forest products.

While the forest products industry plays a historically important role in Southeast Alaska, recent old-growth timber sales have undercut the Tongass transition, eroded public confidence and trust in the Forest Service, and serve as unnecessary obstacles to the creation of a sustainable timber industry in the Tongass. Old-growth sales going back to the Log Jam timber sale, if not before, have been sold to the public as "bridge timber" and as a way to encourage the industry to transition. More recently, the Kuiu timber sale, and the shift of that sale from 50% export to 100% export, fly in the face of the desires of a majority of Southeast Alaskans, undermine the proposed Forest Plan Amendment, and entirely lack justification. In reality, instead of offering a limited supply of old-growth timber in a way that prudently meters out the remaining old-growth bridge volume over time, the Forest Service has too often maximized the volume of old-growth timber it offers in each sale while continually developing a new backlog of large-scale old-growth timber sales to offer out in the future. Rather than encouraging investment in transition technologies and entrepreneurship within the Tongass timber industry, this scheme encourages the timber industry to dig in its heels against the tides of change and to cut as much as possible as fast as possible with the assurance that future timber sale planning will provide new, highly-subsidized old-growth timber volume.

Timber planning too often comes at the expense of the region's strong economic base of fisheries and tourism. Once-productive salmon streams no longer support abundant salmon runs and ample wildlife populations when clearcut logging disrupts the recruitment of large-woody debris, erosion overburdens nearby streambeds, or road-stream crossings cut off important spawning or rearing habitat. Tourists and recreationists don't travel to the Tongass to see and hike through large swaths of clearcut lands; they come to take in its scenic beauty and in-tact landscapes. The Forest Service has identified roughly 65 watersheds in need of significant restoration as a result of past logging and road-building activities and estimates it will cost \$100 million to address the backlog of unmet watershed restoration needs.⁹ Roughly one-in-four jobs in Southeast Alaska are in either the fishing or tourism industries.¹⁰ By comparison, Tongass timber supports fewer than 200 private-sector jobs.¹¹ If the Tongass

⁷ FEIS at 3-481.

⁸ FEIS at 3-485.

⁹ USDA, *Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013*, R10-MB-734 at 11 (Nov. 2011).

¹⁰ See TCW Economics, at 16; McDowell Group, at 1.

¹¹ FEIS at 485.

timber program is to truly support the local and regional economy, it must be designed with the fishing and tourism industries at the forefront and to, in every way possible, avoid and minimize impacts to fish and wildlife habitat.

When evaluating the benefits from forest lands to society, the Forest Service places far too much emphasis on traditional extractive resources while largely ignoring benefits from fish, wildlife and water resources. As discussed above, by far the most valuable activities occurring on the Tongass are derived from intact fish and wildlife habitat and wild scenery. This is true throughout the country, but is especially relevant in Southeast Alaska where the Tongass comprises such a large portion of the land base. Southeast Alaska's timber industry pales in comparison to the region's fishing and tourism industries. Maximizing the benefits from the Tongass to the public requires the Forest Service to manage the Tongass in a way that prioritizes its contributions in fish, wildlife and visitor services.

The past 60 years of industrial logging has targeted the rarest and most productive stands of large-tree old-growth forest, thus reducing the highest-volume contiguous old growth by 66 percent forest-wide.¹² On Prince of Wales Island, 94 percent of the contiguous large-tree old-growth stands have been logged since 1954.¹³ This large-tree old-growth forest, which historically covers less than five percent of the Tongass, is among the most valuable habitat for fish and wildlife. The overwhelming weight of the scientific community recognizes the extraordinary value of the remaining big-tree old-growth and has repeatedly called on the Forest Service to speed up the transition and end its old-growth timber sale program.¹⁴

IV. Objections to the draft ROD and FEIS for the Proposed Forest Plan Amendment:

While TU very much appreciates the thoughtful consideration, time and effort that has gone into the proposed Forest Plan Amendment, and recognizes the significant leadership that was demonstrated in identifying the Tongass 77 and Audubon/TNC Conservation Priority areas as NOT suitable for old-growth timber production, we also maintain a few particular objections, as identified below. TU raised each of these objections during its comments on the DEIS and during scoping.

- a. Maintain Standards and Guides for Young Growth in the Tongass 77, Beach and Estuary Fringe, Riparian Management Areas, and Old-Growth Reserves.

¹² Albert and Schoen 2013.

¹³ *Id.*

¹⁴ See Jack Ward Thomas and Mike Dombeck, Seattle Times Op Ed, Declare harvest of old-growth off-limits and move on (Aug 23, 2003); Letter to the President by 78 North American Scientists (lead signatories were Jack Ward Thomas and Mike Dombeck) calling for a national old growth policy to protect the remaining old growth on national forest lands throughout the US (June 25, 2014); Letter to Secretary Vilsack from 200+ North American Scientists urging a quick transition out of old-growth logging on the Tongass National Forest (October 15, 2014); Joint Society letter to Secretary Vilsack from American Fisheries Society (AK Chapter), American Ornithologist's Union, American Society of Mammalogists, Ecological Society of America, Pacific Seabird Group, Society for Conservation Biology, The Wildlife Society (January 20, 2015).

Certain young growth lands, including beach and estuary fringe, riparian management areas (RMAs), and OGRs are incredibly important for fish and wildlife. Existing standards and guidelines are designed to ensure landscape-scale connectivity and function for numerous fish and wildlife species. While TU encourages the Forest Service to make young growth stands available for timber production where doing so will accelerate the pace of the transition without risking conservation objectives, logging in these particular areas is inconsistent with the goals and management objectives for each respective land use designation.

As the Forest Service correctly observed, young growth within beach and estuary fringe, RMAs and OGRs “comprise a very small component of the forest land.”¹⁵ This already small component becomes even smaller when further limited to young-growth from beach and estuary fringe, RMAs and OGRS that *also* lie within the Tongass 77. Yet, while these lands have the potential to provide only a very small supply of timber, they are hugely important for their fish and wildlife habitat:

The Forest Service recognizes the exceptional fish and wildlife values of the T77 watersheds. These watersheds, along with the watersheds in LUD II status are considered the pillar of commercial, sport, and subsistence wild salmon harvest in the region and provide a large contribution to the southeast Alaska economy.¹⁶

TU encourages the Forest Service to recognize the great importance of beach and estuary fringe, RMAs, OGRs and the Tongass 77 for their ecological values and identify these areas as NOT suitable for all timber production, including young growth. At a minimum, beach and estuary fringe, RMAs and OGRs that are *also* within the Tongass 77 should be NOT suitable for timber production. Harvest should be allowed in these areas only where necessary for fish and wildlife habitat restoration activities. The relative small supply of young growth timber available from these areas will not affect the success or failure of the Forest Service’s ability to reliably supply timber while the overwhelming importance of fish and wildlife habitat in these areas makes clear that logging these areas will have long lasting and irreparable impact.

b. Make Explicit that the Forest Plan Amendment will not Grandfather in On-Going Timber Sales.

Potential conflict exists where old growth timber sales include stands within the Tongass 77 or Audubon/TNC Conservation Priority areas that are identified as NOT suitable for old-growth timber production in the proposed Forest Plan Amendment. Examples of this include the Wrangell Island timber sale, in which the Forest Service has released a DEIS that includes units from within the Tongass 77, and the Kuiu Island timber sale, in which the Forest Service has solicited bids for a sale that includes units within the Tongass 77 and Audubon/TNC Conservation Priority areas. While the final ROD for the Wrangell Island timber sale is likely to

¹⁵ FEIS at I-44.

¹⁶ FEIS at I-56.

be released after the proposed Forest Plan Amendment is finalized, the ROD for the Kuiu Island timber sale was released in 2008, well before the proposed Forest Plan Amendment was conceived.

To avoid confusion and minimize unnecessary conflict, TU encourages the Forest Service to include a provision in the final ROD for the Forest Plan Amendment and in the Forest Plan Amendment itself that explicitly states that the suitability determinations of the Forest Plan Amendment will apply to all timber sales for which the Forest Service has not yet issued a final ROD, such as the Wrangell Island Sale. In addition, for any legacy sale for which the Forest Service may have already issued a final ROD, TU encourages the Forest Service to recognize the exceptional fish and wildlife values of the Tongass 77 and either remove units that overlap with the Tongass 77 or complete a supplemental environmental impact statement.

c. Complete all Old-Growth Timber Sale Planning Within Five Years.

Central to a successful transition is the need to cap the volume of old-growth timber planned and offered for sale from the Tongass in a predictable manner. Doing so will provide the timber industry predictability and the opportunity to adequately prepare for the transition. It will also properly incentivize the timber industry to transition away from old-growth logging and afford non-timber forest users adequate assurances that a meaningful transition is taking place. The TAC recognized this need by recommending the Forest Service identify the total pool of bridge old-growth timber within two years and complete all planning of bridge old-growth timber through Gate 2 within five years:

The TAC agrees that the USFS should . . . Develop the unit pool for bridge timber volume to meet the timeline goals set below (1 and 2) . . .

Goals for planning the unit pool for the old growth bridge timber volume from the defined land base development:

1. All timber pool volume is through Gate 1 by year two through extensive collaboration with other landowners and stakeholders.
2. All timber pool volume is through Gate 2 (National Environmental Policy Act (NEPA) cleared) by end of year five.¹⁷

Nothing in the proposed Forest Plan Amendment embodies these recommendations. To the contrary, the Forest Service's current practice of irregularly updating its five-year timber sale schedule to include new old-growth timber sale planning in out-years will be allowed to continue under the Proposed Forest Plan Amendment, which undermines a successful transition, runs inapposite to the TAC's recommendations, and provides no certainty to tourism and recreation businesses that operate in those landscapes.

¹⁷ TAC Recommendations at 13.

The Response to Comments in the FEIS inadequately addresses this issue by stating that “[t]imber sale scheduling . . . needs to be flexible to accommodate changes in policy, needs, timber appraisals, and funding.” and that “[s]ales are typically spread out over time to account for demand, market fluctuations, and availability of NEPA cleared timber.”¹⁸ Both of these statements demonstrate a fundamental misunderstanding of our prior comments on this issue and in the Forest Service’s role in the transition. While the Forest Service appears to be seeking to maximize flexibility, as most any agency is want to do, the effect of this is to undermine the transition by suggesting the Forest Service’s commitment to the transition is fluid and encouraging the timber industry to resist the transition in favor of the status quo.

While the Forest Service appropriately wants flexibility in implementing projects, it must be steadfast in its commitment to the ultimate goal of transitioning the Tongass timber program from one based on old-growth timber to one predominantly based on young-growth forest products. This means the Forest Service must define the total pool of bridge old-growth timber and create a deadline for the planning of bridge timber through Gate 2 that is consistent with the TAC recommendations and the Secretary’s memorandum.

d. Develop a new and Accurate Market Demand Estimate for Tongass Timber.

One significant hurdle to a rapid and meaningful transition is that the Forest Service consistently and artificially overestimates market demand for Tongass timber. Too often, mill capacity is confused for market demand without accounting for the massive subsidies and long-term contracts that propped up the Southeast Alaska timber industry, the on-going subsidy required for its maintenance today, or other economic and social factors that have led to the Tongass timber industry’s steady decline in recent decades. This overestimation of market demand causes the Forest Service to consistently and inappropriately overinflate the size of its timber sales in an effort to maintain a massive shelf volume of timber. Properly scaled and appropriately placed timber sales will continue to evade the Forest Service on the Tongass so long as it continues to futilely chase artificially inflated market demand estimates that cannot be met.

A true estimate of market demand must be expressed as a function of price, not as a fixed value. Demand does not exist in a vacuum. As price increases or decreases, demand will move in the inverse direction. As has been well documented, the Tongass timber program operates at tremendous financial loss to the Forest Service and federal taxpayers.¹⁹ Over a five year period from 2009 to 2013, the Forest Service experienced a net loss of \$713 for every thousand board-feet of Tongass timber sold and more than \$20 million annually.²⁰ However, timber demand estimates fail to account for this massive subsidy, which if passed on to the timber purchaser would certainly result in less demand for Tongass timber. The Forest Service often requires other forest users, including tour businesses, outfitters and guides, to cover costs

¹⁸ FEIS at I-19.

¹⁹ Headwaters Economics, *The Tongass National Forest and the Transition Framework: A New Path Forward* at 5 (Nov 2014).

²⁰ *Id.*

of NEPA, trail maintenance, or other related staff costs, which are costs not borne by the Southeast Alaska timber industry.

In order to better serve the needs of Southeast Alaskans and the American public, the Forest Service must bring management of the Tongass more in-line with what is socially and ecologically acceptable. Rapidly ending the planning and sale of large-scale old-growth timber sales on the Tongass will reduce conflict and litigation, protect important fish and wildlife habitat, and help promote stable and strong local economy and communities. While the FEIS addresses some of the issues TU has raised regarding market demand to varying degree, the Response to Comments ignores fundamental flaws in how the Forest Service estimates market demand and simply states that revisiting its methodology for calculating market demand is “outside the scope of this Forest Plan amendment.”²¹ Economically and ecologically sound management of the Tongass will continue to evade the Forest Service until it develops an accurate estimate of market demand that expresses demand for Tongass timber as a function of price, ends the outdated practice of heavily subsidizing large-scale old-growth timber sales, and seeks to meet the demand that exists when purchasers are required to bear the full costs of timber sale planning and administration, environmental review, and restoration.

e. Incorporate a one-for-one transition from old growth to young growth.

One key component of the TAC recommendations was to make the transition from old-growth timber harvest to young-growth timber harvest on a one-to-one basis. In particular, the TAC provided:

By bringing more young growth forward sooner in the transition period, the Forest can reduce old growth harvest earlier. For every unit of young growth volume brought forward into the transition solution, there should be an equal unit less of old growth. Ultimately, this will result in transitioning from old growth to young growth in less than 15 years by making more young growth available for harvest and substituting young growth for old growth on a one-to-one volumetric basis . . .²²

This one-to-one provision provides assurances to conservation stakeholders that old-growth timber harvest will decrease while also providing a commensurate substitute supply for timber purchasers. However, in the Response to Comments, the Forest Service turns this provision on its head and, instead of recognizing it as a provision to speed up the transition, treats it as a provision to prolong the transition.²³ TU encourages the Forest Service to commit itself to maintaining a one-to-one exchange as the TAC recommended to enable a more rapid transition.

²¹ FEIS at I-156.

²² TAC Recommendations at Executive Summary and 7.

²³ FEIS at I-33.

f. Ensure Projects Comply with Forest Service Standards for the Protection of Fish and Wildlife.

Forest Service standards for fish and wildlife should not be treated as “optional.” One example where this issue has come to a head is with standards for deer population densities. Past logging and road building has unacceptably reduced deer densities in many portions of the Tongass, including on portions of Prince of Wales, Mitkof and Kupreanof Islands. Rather than disregarding deer population standards, the Forest Service should avoid projects that are likely to further impact impaired deer populations while, simultaneously, restore impacted habitat so affected populations may return to healthy densities. In the Response to Comments, the Forest Service states that “[m]any places on the forest may not meet this number naturally.”²⁴ While that may be true, the standards written into the forest plan still create the likely and unacceptable result that projects may be approved where deer population densities are below Forest Service standards due to impacts from logging and road building, and not due to naturally low population densities. TU encourages the Forest Service to include language in the Final Plan Amendment that clearly prohibits the implementation of projects that are likely to have a negative effect on deer populations in areas where logging and road building has caused a decrease in population density below existing standards.

V. Conclusion

In his July 2, 2013, memorandum, Secretary of Agriculture Vilsack recognized the Tongass as a national treasure and called attention to its unique and important contributions to local culture and subsistence, recreation and fishing, carbon sequestration and the economic and cultural well-being of the region.²⁵ The Secretary affirmed the need to transition to more ecologically, socially and economically sustainable forest management on the Tongass and directed the Forest Service to transition the Tongass timber program so the vast majority of timber sold by the Tongass would be young growth within 10 to 15 years.²⁶ Because this memorandum was issued in 2013, this direction established the goal of ending large-scale old-growth logging on the Tongass sometime between 2023 and 2028.

While TU has concerns about the proposed Forest Plan Amendment, as particularly discussed in subsections (a) and (b), above, we are also encouraged that the proposed Forest Plan Amendment may also move the Tongass closer toward a meaningful transition that ends large-scale old-growth logging and protects important fish and wildlife habitat. In particular, the identification of the Tongass 77 watersheds and TNC/Audubon conservation priority areas as NOT suitable for timber production is monumental and goes a long ways toward ensuring future management of the Tongass is aligned with the region’s needs and better supports important fishing and tourism industries. We commend the Forest Service and its many dedicated staff for the great strides it has taken in moving the Tongass toward more sustainable

²⁴ FEIS at I-81.

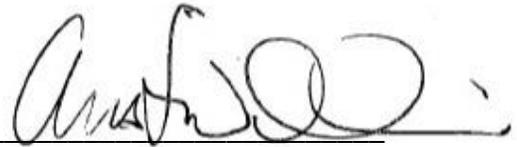
²⁵ Secretary Vilsack, *Addressing Sustainable Forestry in Southeast Alaska*, Secretary’s Memorandum 1044-009 at 1 (July 2, 2013).

²⁶ *Id.*

forest management that offers increased protections for the region's most valuable and important fish and wildlife habitat.

Thank you for your consideration and for the opportunity to provide comments on the DIES and Proposed Forest Plan. Please do not hesitate to contact me by email at awilliams@tu.org or by phone at 907.227.1590 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Austin Williams", written over a horizontal line.

Austin Williams
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