

August 30, 2016

**VIA ELECTRONIC MAIL**

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USDA Forest Service, Alaska Region

Attn: Tongass Objections

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Re: Objection 2016 Amended Tongass Land Management Plan

Thank you for the opportunity to file objections to the 2016 Amendment to the Tongass Land Management Plan (TLMP amendment). We offer this objection in addition to the objection that Earthjustice submitted on behalf of several conservation groups. We applaud the fact that the Amendment to TLMP takes important steps by recognizing “Tongass 77” priority salmon watersheds. However, to accomplish the directive laid out by Secretary Vilsack to speed the transition out of old-growth logging and to support other sustainable opportunities, the Forest Service must include practical measures to enforce the end of old-growth logging and to strengthen protections for lands that provide important habitat for wild salmon and wildlife and support the region’s robust commercial fishing, tourism and recreation industries.<sup>1</sup>

- **Enforce an end to old-growth logging.** We believe more can be done to require a ramp-down in old-growth volume. The Secretary’s directive recognized the ecological imperative to end the outdated practice of clear-cutting old-growth in the Tongass, but the TLMP amendment relies on the availability of economically viable young-growth industry to end old-growth logging. Adding an enforceable ramp-down of old-growth volume will ensure that the Forest Service continues to make management decisions based upon achieving this goal.
- **Strengthen protections for abundant salmon.** Given the importance of wild salmon to the region’s ecology, economy and culture we believe that the agency should show extreme restraint in watersheds with abundant salmon. Therefore, we believe there should be no logging in the “Tongass 77” watersheds identified by the Tongass Advisory Committee (i.e., no old-growth and no second-growth).

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<sup>1</sup> Memorandum 1044-009, Addressing Sustainable Forestry in Southeast Alaska.

- **Improve direction for young-growth management.** The TLMP amendment Young Growth Direction gives the agency too much flexibility in areas identified by the Tongass Advisory Committee to be managed with “co-intent.” The Desired Condition for Young Growth in riparian areas calls for “Active management of young-growth stands that are suitable for timber production within riparian management areas (RMAs) supports a range of social, economic and ecological needs. These areas are managed to accelerate old-growth characteristics.”<sup>2</sup> However, creating 10-acre clear-cuts will not accelerate old-growth characteristics, it will only create new clear-cuts. The provisions that allow for openings up to 10 acres are inconsistent with the goal of accelerating old-growth characteristics or supporting any ecological needs. Similar standards in beach fringe and old-growth reserves are inconsistent with the desired conditions of these areas, particularly within priority salmon watersheds.

Southeast Alaska has already transitioned away from old growth logging, and this plan is an opportunity for the Forest Service to bring its management of the Tongass more in line with the priorities of the region. Today the Tongass National Forest remains a hugely important resource for the industries that drive the region’s economy. Commercial fishing, tourism and recreation rely on the unique resources of the Tongass National Forest. By moving forward towards protecting the resources they rely on, we can ensure that the Tongass National Forest continues to support the communities of Southeast Alaska.

Thank you for your careful attention to this objection.

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<sup>2</sup> Proposed Forest Plan. 5-9, DC-YG-RIP-01,