



Sitka Conservation Society
Box 6533
Sitka, Alaska 99835
(907) 747-7509
info@sitkawild.org
www.sitkawild.org

*“Protecting the natural
environment of the Tongass while
supporting the development of
sustainable communities in
Southeast Alaska – since 1967.”*

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 the Sitka Conservation Society (SCS) 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. SCS has been working to protect Southeast Alaska’s quality of life and the Tongass National Forest since 1967. Based in Sitka, Alaska, SCS has more than 1,000 local members that use and depend on the natural resources the Tongass provides, and SCS is investing significant resources to ensure the Tongass is managed so these important resources continue to be available for future generations. SCS is committed to the conservation of wilderness areas and to the sustainable development of Southeast Alaska’s natural resources.

As SCS’ Executive Director, I served on the Tongass Advisory Committee (TAC). SCS maintains its commitment to the agreement reached by the TAC and supports the Forest Service’s embodiment of those recommendations in the Forest Plan Amendment. By including increased protections for the Tongass 77, Audubon/TNC Conservation Priority Areas, and Inventoried Roadless Areas, the Forest Plan Amendment strikes an appropriate balance between providing a path forward for Southeast Alaska’s timber industry to transition to more sustainable forest practices and maintaining the vital function and conservation of the region’s fish and wildlife habitat that are essential to our way of life, culture and economy.

While SCS commends the Forest Service for its work on the Forest Plan Amendment and encourages the Forest Service to finalize the amendment as soon as possible, SCS also makes the following minor objections:

1. Any timber sales that are not yet under contract should comply with the suitable land base identified in the amendment. For the Wrangell Island timber sale, the Forest Service should remove all sale units from within the Thoms Lake VCU. For the Kuiu Island timber sale, the

Forest Service should prepare a supplemental EIS to consider significant new information and conditions that did not exist when the ROD was signed in 2008.

2. The Forest Service should identify the total pool of old-growth bridge timber within two years and complete all planning of old-growth bridge timber through Gate 2 within 5 years. This timeline was a key recommendation of the TAC that is important to ensuring a timely and reliable transition to a more sustainable timber industry based on young-growth forest products.
3. In addition to assuring an end to large-scale old-growth logging within 15 years, the Amendment should provide for a more rapid reduction in old-growth harvest on a one-to-one basis with any young-growth timber made available. This one-to-one provision was designed by the TAC as a way to accelerate the transition, but has become confused in the current proposed Amendment as a potential tool to delay reducing old-growth harvest.

While SCS maintains the above objections to the Forest Plan Amendment, we strongly encourage the Forest Service to complete its Amendment as quickly as possible. Finalizing and implementing the plan amendment is critical to protecting the region's important fish and wildlife, supporting the region's important fishing and tourism industries, and ensuring Southeast Alaskans can continue enjoying their way of life for generations to come.

Sincerely,



Andrew Thoms
Executive Director
Sitka Conservation Society
PO Box 6533
Sitka, AK 99835
(907) 747-7509
andrew@sitkawild.org