



Regional Summary Report Alaska Region 10

US Forest Service Planning Rule Public Roundtable Discussion April 13, 2010 – Juneau, Alaska

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Executive Summary

The Alaska Region of the USDA Forest Service (USFS) hosted a public roundtable discussion of the national Planning Rule on April 13, 2010, in Juneau, Alaska. The regional roundtable sessions were attended by over 100 people, who offered diverse views of what a new national Planning Rule should include, based on their experiences and perspectives regarding forest planning and management of National Forest System (NFS) lands and resources in Alaska and other regions.

Several topics received particular attention during the roundtable discussions. As the purpose of the sessions was to obtain broad input, the following do not represent points of consensus – but reflect several primary areas of discussion. This summary report presents much more detail on the range of topics discussed and the diverse opinions expressed. This full record of input, including the appended notes from the facilitated discussions and copies of written and email comments, will be provided to the USFS rule-writing team for their consideration as they draft the new Rule.

- **The primary topic of importance to participants in the Alaska Region roundtable was the contribution of NFS lands and resources to vibrant, sustainable community economies.** Many Alaskan communities, some of which are quite remote and isolated, are surrounded by National Forest lands. Forest Service plans and actions have a substantial influence on the growth and sustainability of community and regional economies, and significant effects on communities, families, schools, and businesses. There was strong sentiment at the Alaska Roundtable that the Planning Rule should require balanced multiple use of NFS lands and resources. People expressed differing views on how a proper balance of uses would be achieved – with support voiced for economic sectors including timber, mining, communication, transportation, energy, subsistence, fisheries/mariculture, and tourism – as well as caution expressed about how development in one sector could impact other sectors and affect the health and sustainability of forest ecosystems and communities. The need for forest plans to have clear implementation plans was emphasized, to provide a more certain environment for commodity development and other projects. The need for access on NFS lands was also highlighted. Finally, it was suggested that the Rule allow forest management to adapt to changes in economic conditions, during the tenure of a forest plan.
- **Development of renewable energy resources was highlighted in discussions of sustainable community economies and climate change.** In Southeast Alaska, many communities and businesses are hampered by dependence on very high cost diesel power. Many participants emphasized the need for the Forest Service to facilitate development of the region’s renewable energy sources (e.g., hydroelectric, geothermal, wind, wave) through planning, coordination with government and other partners, provision of access, and permitting. Increased availability of renewable energy will reduce energy costs and greenhouse gas (GHG) emissions. The Planning Rule should provide this emphasis and a link to national energy policy.

- **The Planning Rule should avoid a prescriptive “one size fits all” approach.** While national guidance on forest plan goals and benchmarks is necessary, many participants emphasized that the Rule should provide the flexibility (with accountability) to develop and implement locally- or regionally-tailored approaches to issues and conditions relevant to each region or forest. They note that Alaska’s forest ecosystems are largely intact, which differs from many National Forests. In addition, the Alaska Region differs from many other regions in its small regional population, isolated communities, and large amount of NFS land surrounding these communities.
- **Effective collaboration should be a key element of forest planning and project planning.** Meeting participants generally supported collaborative involvement of stakeholders in the planning process, emphasizing the need for early and effective consultation with Tribal Governments and communication with communities. It was suggested that the planning process provide both the more traditional style of public involvement and testimony, as well as collaborative and informal opportunities for public input; elicit and incorporate traditional and local knowledge; and serve as a platform for educating the public about forest resources and management issues. Collaboration across land ownerships (All-Lands) was emphasized as important to achieving outcomes on a landscape scale (e.g., restoration; watershed health; viable, diverse species), as well as development of regional projects (e.g., energy, transportation, communication).
- **This process should consider and build on effective elements of the 1982 Planning Rule.** A number of participants noted that there are effective elements of the 1982 Rule that should be retained. It was suggested that the USFS conduct an internal review of the 1982 rule – noting its strengths, deficiencies and gaps – and share results with the public during this process.

Introduction

In December 2009, the Forest Service announced its intention to develop a new national Planning Rule to guide development of management plans for the nation’s national forests and grasslands. The Forest Service initiated an extensive collaborative process to engage citizens, interest groups, governments, and scientists in roundtable discussions in each USFS region and at the national level to discuss how the new Planning Rule should address the wide range of environmental, economic and cultural issues that affect each region.

The USFS Alaska Region (Region 10) hosted public roundtable discussions on April 13, 2010, in Juneau, Alaska, with the opportunity to participate via web and teleconference. The roundtable’s afternoon and evening session each began with a video welcome by Forest Service Chief Tom Tidwell, followed by welcoming remarks by Regional Forester Beth Pendleton. Staff explained process for developing the national Planning Rule and

described how the Rule differs from individual forest plans, to help meeting participants focus their comments on developing an effective national Rule. Following the plenary session, facilitated group discussions focused on the eight substantive and process principles listed in the Notice of Intent (NOI) published in the *Federal Register* on December 18, 2009, with the addition of the topic of recreational use of NFS lands.

Comments provided during the facilitated group discussions were various and diverse. This document summarizes the key points made during the two Alaska Region roundtable sessions, including comments provided in writing or via email during the meeting. It summarizes the main points and counterpoints raised during discussions. This summary does not represent a consensus or reflect agreement among participants and points are not listed in any order of priority or emphasis.

A more detailed Recording Worksheet is appended, which list all of comments made during the facilitated discussion. Copies of the written and email input are also appended. All of this information will be presented to the USFS Planning Rule writing team for their consideration.

Meeting Overview

- Date of Meeting: April 13, 2010 2:00-5:00 p.m. and 6:00-8:00 p.m.
- Location of Meeting: Juneau, Alaska, with interactive web/teleconference connection available to off-site participants
- Number of Participants (not including USFS representatives): approximately 88 (2:00-5:00 p.m.) and 20 (6:00-8:00 p.m.) Participants included a diverse representation of Tribal, local and state governments; business interests; residents of communities in the region; users of NFS lands and resources; nongovernment organizations; and the media (radio, newspaper, independent film). Thirty Americorps volunteers working with the Southeast Alaska Guidance Association (SAGA) attended the afternoon session, representing 17 different states. The tally also includes approximately eight phone/web participants in the afternoon session and five phone/web participants in the evening session. There was much higher participation by people who had association and experience with Region 10's Tongass NF in Southeast Alaska, than the Chugach NF in Southcentral Alaska.
- Pre-Meeting Outreach: USFS Region 10 sent direct invitation letters to about 170 stakeholders throughout Alaska, and some in the Pacific Northwest. These included state and local government officials, tribal organizations, Alaska native corporations, environmental organizations, and members of the timber, mining, and recreation sectors. The roundtable session was also publicized through the national and Region 10 planning rule websites, a regional press release, and radio public service announcements.

- Discussion Group Format and Topics: As they entered the session, roundtable participants were asked to identify the two or three substantive or process principles listed in the NOI that were of most interest to them. Based on this input, the afternoon session was divided into four small discussion groups after the plenary. Three of the small groups addressed two substantive principles each (restoration, climate change, watershed, diversity, recreation, community economies). Meeting participants were free to choose the group to attend and to move between groups. The fourth small group meeting in the afternoon was dedicated to the 30 SAGA volunteers, who were invited to discuss all aspects of the Planning Rule. All participants in the evening session stayed in one discussion group (discussion emphasis on community economies, regional flexibility, and planning process). Forest Service staff was available as subject matter experts for each facilitated group session, but did not participate actively in the discussions.
- Point of Contact for Facilitation and Reporting: Jan Caulfield Consulting, a Juneau, Alaska-based independent consulting firm specializing in facilitation, conflict resolution and planning in natural resource management fields, was contracted by the Institute for Environmental Conflict Resolution (IECR) to design and facilitate the Alaska Region roundtable event, in close coordination with Region 10 leadership. For more information, contact Jan Caulfield, 907-523-4610, janc@gci.net

General Comments Regarding Planning Rule

This section captures a number of general comments regarding the current Planning Rule and suggestions for the new Rule. Additional comments regarding these points are included in the following sections that summarize discussion of the substantive and process principles.

What works now; what concepts should be carried into the next Rule?

- The 1982 Planning Rule has many valuable elements that should be retained. This planning process should build on and add to what is already effective in the 1982 Rule.
- It was suggested that the USFS conduct an internal review of what is working well in the 1982 Rule, gaps or deficiencies, and emerging issues that aren't addressed. The results of this analysis should be shared with the public during this planning rule development process.
- The existing Rule has a good section on biodiversity that should be maintained and that will be useful in dealing with climate change.

Comments on Plan Content

- The Rule needs to emphasize the Alaska National Interest Lands Conservation Act (ANILCA) Title VIII and give clear instruction for implementation of Title VIII in Alaska

Region, including guidance for situations where there is conflict between the Rule and ANILCA.

- The 1982 Planning Rule does not address watershed health and climate change. These issues should be addressed in the new Rule.
- The Rule should provide more direction on renewable energy development and implementation of the National Energy Policy.
- All relevant public laws need to be referenced in the planning rule and considered in forest planning.
- The Planning Rule should give more attention to protection of cultural resources.

National Guidance / Accommodation of Regional Differences

- The Planning Rule should provide general national guidance to ensure that federal forest management laws are implemented and national lands and resources are managed properly. However, the Rule should also provide flexibility to respond to regional differences. Forest plans should analyze and address unique forest conditions; not be constrained by prescriptive national guidance.
- The Rule should allow each region/forest to focus on the topics relevant to that area.
- The Rule should avoid “one size fits all” approach and allow for locally- or regionally-tailored solutions. Alaska’s forest ecosystems are largely intact, which is different than in many National Forests. In addition, the Alaska Region differs from many other regions in its small regional population, isolated communities, and large amount of Forest Service land surrounding these communities (particularly in Southeast Alaska). Many Alaskans have a different perspective related to National Forest planning than that found in the rest of the country.

Substantive Principles – Summary of Input

Small groups were formed during the afternoon roundtable session to discuss each of the six substantive topic areas listed below. During the evening session, participants stayed together in a single group to discuss all topics of interest.

I. Plans could foster sustainable NFS lands and their contribution to vibrant community economies.

The primary topic of importance to participants in the Alaska Region roundtable was the contribution of NFS lands and resources to vibrant local community economies. This was evidenced by the attendance of more than 45 people at the afternoon small group session on this topic, and the further extensive comment on this topic during the single

group evening discussion session (20 participants). See Appendices 1 and 2 for more detailed comments regarding this topic.

General Comments

- The Planning Rule should require a balance between conflicting needs and activities on the National Forests, with no one use trumping others. Roundtable participants frequently used words such as balance, multiple use, and sustainability. This balance of multiple uses is especially important for the Tongass NF in Southeast Alaska, given that the USFS is the dominant landowner in the region and many communities are surrounded by National Forest.
- The Rule needs to provide guidance for making trade-offs between forest plan priorities, uses and objectives. Forest plan alternatives should clearly indicate what trade-offs are being made and explain effects of the alternatives on local economies and communities.
- The Rule should require a realistic implementation plan for each forest plan, with specific actions, timelines, targets and incentives. This will allow communities, businesses, and others to be able to plan for economic development, capitalize on funding opportunities, etc.
- The Rule should address specific problems caused by implementation of the roadless rule in Alaska. Access is critical for economic development of timber, minerals, energy and transportation, and other uses.
- The Rule should address land ownership adjustments and exchanges to accommodate growing communities and Tribal land selections.
- Economic analyses used in planning should be based on accurate and relevant data, should address changing economic conditions, and should provide an honest evaluation of economic conditions and future opportunities. Economic assumptions and any data limitations should be made clear. If accurate and relevant economic data is not available for the planning area, it should be collected to support the planning process. Economic models used in forest plan development also need to be relevant to the region and planning area.

Sustaining Community & Regional Economies Depends on Forest Service Actions

- The Forest Service needs to think in terms of communities, families, jobs and schools. Communities in Southeast Alaska are particularly economically fragile. The Planning Rule should allow for sustainable community growth. There should be “room in the Planning Rule for people.”
- The Rule should acknowledge that sustainable communities depend on multiple use management, access to resources, and development opportunities. Communities

that depend on economic activity on Forest Service lands need to see a balance between the environment and economic development in forest plans.

- While there was extensive discussion of the importance of economic development opportunities, some participants also noted that wild and intact ecosystems and vibrant communities go together; only by balancing these two will both be healthy.
- Sustainable year round economies and jobs are the goal (not a “boom and bust” economy). Suggestions for creating jobs and economic benefit included: value-added processing of forest resources; providing predictable opportunities for businesses (e.g., permits, resources, access), facilitating new small businesses that use forest resources; local hire for USFS employment; and use of traditional and innovative contracting authorities (e.g., stewardship contracts, Good Neighbor Authority, contracts involving local communities).
- The Rule should provide for the USFS to monitor/track community economic conditions (e.g., energy costs, unemployment) and adapt management of NFS lands and resources to address changing economic conditions and promote community sustainability. Forest plans need to have an “opportunity clause” to allow the region to take advantage of changing economic conditions, new technologies, and opportunities that arise, without a lengthy plan amendment process or having to wait for the next plan revision.

Planning Rule Attention to Important Economic Sectors

Comments were made about the importance of addressing a wide range of economic sectors in the Planning Rule and in forest plans. The following economic sectors are of primary importance to participants in the Alaska Region roundtable. Differing viewpoints are reflected in the comments summarized below.

- Subsistence
 - The Rule should acknowledge that subsistence use of fish, wildlife and other forest resources is important/essential to local food economies in Alaska, and should address this as a food security issue. The Rule should include guidance for implementation of ANILCA Title VIII.
- Timber
 - It is important to provide an annual consistent supply of timber, to allow businesses to get established and invest in infrastructure. The Rule should require forest plans to set targets for commodity production and designate where the commodity will come from, and require follow-through on an implementation plan (e.g., ten year sale plan).
 - Under multiple use management, commercial timber harvest can be done in a manner that does not harm ecosystems or threaten species.

- While moving toward a second growth timber-based economy in Southeast Alaska may be desirable, it should be recognized that the Tongass NF is 30 years away from this. Closing roads and removing access may preclude development of a second-growth timber economy.
- A restoration-based economy is not a replacement for commodity production.
- Timber harvest should be permitted at a scale that will allow for other multiple uses and maintain healthy ecosystems. It is important to stay away from the guaranteed timber harvest board footage that has led to problems in the past.
- Communities in Southeast Alaska need to shift from dependence on timber harvesting to a more balanced economy, with a focus on restoration and sustainability.
- Small projects can have a bigger long-term economic impact than large timber sales.
- Comments were received both in favor of requiring in-region processing of harvested timber, and opposed to such a requirement.
- Mining
 - Areas with mineral development potential and access to these areas should be considered in planning. Implementation of the roadless rule in Alaska is problematic for mineral development.
 - Everything in the world is “either grown, or mined.” Mineral development is very important to community, regional and national economies.
- Communication
 - Forest service planning needs to consider the communication needs of communities, especially those that are isolated. Key communication sites should be identified and access provided in planning.
- Energy
 - The Planning Rule needs to address renewable energy (hydroelectric, geothermal, wind, water, wave) and opportunities for more affordable, renewable and sustainable energy. This is important nationwide to offset GHGs. It is essential to small communities in Alaska Region, as energy costs are so high.
 - Forest service planning needs to be integrated with planning for energy development and transmission lines on the local, national and international levels and promote partnerships to pursue and develop renewable energy projects.
 - The Rule should provide more direction on renewable energy development and implementation of the National Energy Policy.
 - Timely permission to access and develop sites and transmission corridors is key.

- Transportation
 - Forest service transportation planning needs to be integrated with Tribal road planning and State transportation planning. All modes of transportation (ferry, barge, motorized vehicle, float and winged planes) should be considered. Lack of coordination wastes energy and resources and results in decreased access for communities.
 - Plans need to be adaptive and provide a means to revise land use designations and realign transportation corridors that have technical obstacles.
- Fisheries
 - Fisheries and healthy, productive fish habitat are an essential part of the economic picture for forest planning in Alaska. Fish are an important product of the Tongass National Forest. Fisheries provide income to commercial fishermen, are an important subsistence resource, and support businesses and community economies.
 - The Forest Service should encourage development of the shellfish mariculture industry in Southeast Alaska, considering the needs of this industry in its planning and supporting it through permitting.
- Tourism/Recreation/Guiding
 - The Rule should provide for increased access to USFS lands for guiding. Guiding provides access for the public and a high economic return to communities with relatively low environmental impact.
- Ecosystem Services
 - The Planning Rule should consider the value of ecological goods and services produced by the forest and their global importance.
- Local economic production of goods and services reduces the need to import; the Planning Rule should recognize that it is environmentally responsible to develop and use local commodities and reduce fuel used in shipping.

II. Plans could address the need for **restoration and conservation** to enhance the resilience of ecosystems to a variety of threats.

- The Planning Rule needs to define restoration and the types of actions referred to by use of this term.
- The Rule needs to provide guidance for determining what future condition(s) would be the result of ecosystem restoration (that is, for determining what state or condition the project is trying to restore the ecosystem to). The desired future condition may be different than the pre-management condition and may depend upon: the type, quality and services of the pre-management ecosystem; response of the ecological system to expected dynamic changes (e.g., fire events, climate

change); the need or opportunity to address past ecological deficiencies; ecological sustainability; the ecological character and management of adjacent lands; management considerations such as land use designations (LUD) and planned land and resource uses; and practical considerations such as the feasibility and cost of achieving outcomes; and other considerations.

- The Rule should address the collaboration that would be necessary to define desired restoration outcomes.
- The Rule should provide guidance on monitoring restored areas to track and analyze whether outcomes were achieved, lessons learned, relative cost, etc.
- Many participants expressed support for restoration of forest ecosystems, noting the importance of using best science and management prescriptions, recognizing the economic contribution of restoration projects, integrating restoration with other management objectives (e.g., young growth harvest), and support for directing sufficient funds and resources to accomplish restoration.
- The opinion was also expressed that the Rule should not overemphasize restoration, due to its cost that could redirect funds needed for higher priorities. The concern was raised that restoration projects should not be viewed as a replacement for a resource-based economy (e.g., timber harvest).

III. Plans could proactively address climate change through monitoring, mitigation and adaptation, and could allow flexibility to adapt to changing conditions and incorporate new information.

Addressing Climate Change in Forest Planning

- There were very different views expressed at the Alaska Region Roundtable about whether climate change is a certainty that should be addressed in the Planning Rule and in forest plans, or not.
- Many workshop participants expressed that it is time to proactively address climate change in forest planning, based on the best science, modeling and monitoring. They believe that to achieve plan outcomes (e.g., species diversity, ecosystem resilience), forest plans should proactively consider the effects of changing climate conditions on the forest's resources, and consider the long-term effects of forest management actions in the context of a changing climate. Participants noted that the 2008 Tongass NF Land and Resource Management Plan said the forest would address climate change in a future plan, as the course of change was uncertain at the time the plan was adopted. The USFS should no longer put off considering climate change in management plans and actions, even if exact impacts to ecosystems and species are uncertain. Forest plans (e.g., 2008 Tongass NF plan) need to be brought into compliance with the new Planning Rule's guidance on climate change as soon as it is enacted.

- Other participants raised the concern that climate change is not a proven phenomenon that should be addressed in USFS planning. These participants stated that climatic variation may likely be a natural continuation of climatic change the earth has always experienced. They urged that climate change (and concepts such as reducing carbon footprints) not be used to limit development, economic opportunities and growth, and improvements to quality of life. It is inappropriate to direct funds to climate change monitoring, when those funds are needed for other higher priorities. If climate change standards or guidelines are applied, the Rule should require analysis of the impact of those prescriptions on other multiple uses (e.g., timber program).

Mitigation

- The Planning Rule should be proactive in area of climate change mitigation by requiring planning for renewable energy development on NFS lands to reduce GHGs. This is especially important in regions where communities currently rely on diesel power generation and regions that have the potential to export renewable energy to help reduce GHG elsewhere in the nation and internationally. The rule should require partnering with other entities to evaluate and pursue renewable energy (e.g., for the Tongass NF this would include the government of Canada, Canada's First Nations, the region's communities, energy companies.) (Note: General support for appropriate renewable energy development seemed to be shared by most if not all participants, as it would address economic concerns related to community and business sustainability, as well as climate concerns.)
- The Rule should provide guidance regarding the potential for National Forests to engage in carbon markets. The Forest Service should be able to produce, buy, sell and trade carbon credits, with revenues being used to fund other agency programs.
- When forest management alternatives are evaluated under the National Environmental Policy Act (NEPA), the effect of plan alternatives on carbon sequestration and management should be evaluated. In the future, carbon management may become a more significant driver of National Forest planning and management decisions.
- Some participants supported harvesting woody biomass for biofuel production, as a measure to reduce dependence on fossil fuels and as an effective partner with restoration programs (e.g., thinning). However, others cautioned that biofuel energy would release stored carbon and reduce the forest's capacity to sequester carbon. They prefer non-combustion renewable resources (hydro, tidal, wave, geothermal, wind).
- The USFS needs to go greener, as an agency.

Adaptation

- The Rule should recognize that management actions (and desired future conditions for landscapes and ecosystems) must be adapted in response to the effects of a changing climate. For example, it may be contradictory to work to preserve yellow cedar in the Tongass NF, if new species that move into the area are more efficient at sequestering carbon. Is the objective always to preserve the “current” (2010) species assemblage and distribution?
- Forest plans should list species most at risk to climate change and provide guidance for future management if these species are impacted (e.g., emergency action authorities).

Climate Change Science and Monitoring

- The Rule should require forests to use the best science relating to climate change and should emphasize establishment of baseline conditions and monitoring of change.
- The USFS should apply risk management techniques and assess the potential consequences of *not* being proactive in addressing climate change. To be useful, the risk assessment model needs to be based on local conditions and data. (It was noted that the USFS Pacific Northwest Research Station has been researching carbon cycling in Southeast Alaska forests.)

IV. Plans could emphasize maintenance and enhancement of watershed health and protect and enhance America’s water resources

- The Rule should require that forest planning and project planning be done at a watershed unit level. The National Forest Management Act (NFMA) addresses watershed health, but this was not carried into the 1982 planning rule.
- The Rule should provide guidance/direction to preserve endemic processes within watersheds on National Forests, to ensure watershed function, and to maintain water quality and quantity. However, the Rule should not be overly prescriptive, as there is wide local variation in precipitation, water availability, etc.
- Establishing an outcome of watershed “health” is not useful, as you cannot measure achievement of that standard. The Rule should use an alternate metric (participants suggested sustainability) that can be monitored, measured, assessed.
- In watersheds with multiple landowners, collaboration across all-lands will be necessary to address and sustain the functionality of the watershed. The Rule should address the need for such collaboration, but also provide direction to the Forest Service regarding the appropriate role and level of effort for the federal land owner(s) when there is not full cooperation or collaboration among all ownerships.

- The Rule should state that resource management plans must be integrated (e.g., watershed planning must also be integrated with timber harvest planning, restoration opportunities, access planning, etc.) to ensure that these multiple objectives are met.
- The Rule should address the need for restoration of watersheds previously impacted by activities on NFS lands.

V. Plans could provide for the **diversity of plant and animal species and habitats.**

- The 1982 Planning Rule and NFMA include guidance that populations must be “viable and well distributed” in regards to the scale of the planning area should be retained.
- The Rule should not be prescriptive or rigid when addressing methodologies or techniques for addressing species diversity and viability. National Forests need to be able to be *flexible and adaptive* at the forest-level on the best methods/techniques. However, there must be *accountability* on maintaining viable populations and follow-up-monitoring using best available science is essential.
- The Planning Rule needs to require a balance among different goals. The Forest Service needs to balance ecological sustainability with economic and social sustainability. We need to maintain sustainability of species *and* sustainability of communities.
- Alternatively, it was noted that past forest management activities and practices have impacted species diversity and habitats, and this should be considered in future forest plans.
- Forest plans should list species and habitats that are vulnerable to loss and the agency that has responsibility for taking action, especially in cases where emergency species management is necessary.
- The Rule should acknowledge the value of traditional and local historical knowledge of species abundance and diversity, in addition to scientific data.
- The Rule should require forest plans to include monitoring and adaptive management strategies.
- Species diversity should be considered at a landscape scale, which may be the National Forest, multiple Forests, or even across adjacent lands, depending on the species considered. It may be necessary and appropriate to address species diversity across all-lands, through collaboration with adjacent landowners and managers.
- It was suggested that the Rule consider requiring planning for species *sustainability*, not viability, since sustainability is a higher standard.

VI. Plans could address the **recreation use and enjoyment** of National Forest System lands.

- The Rule should address permit fees – providing guidance on development and implementation of fee schedules, and requiring local collaboration/consultation on fees.
- The Planning Rule should require plans to address and assure public access for consumptive and non-consumptive uses, and should address motorized and non-motorized access. The view was expressed that access management should be consistent with the LUD. Another expressed that foot access should be the priority in Wilderness areas. Others noted the importance of retaining access infrastructure (e.g., trails) if lands are transferred from Forest Service ownership,
- Forest plans should be proactive in use of volunteers and stakeholder contributions to recreation resources in times of declining budgets (e.g., allow volunteers to maintain cabins, access roads/trails). The Planning Rule should provide flexibility in application of rules (e.g., regarding use of power tools in Wilderness) to make it feasible for volunteers to assist with maintenance.

Process Principles – Summary of Input

No small group discussions at the Alaska Region Roundtable focused specifically on the three process principles identified in the NOI. The points summarized below were raised in afternoon small groups addressing other substantive topic areas, during the evening roundtable session (which did not break into small groups), or in written/email comments.

VII. The planning process could involve **effective and proactive collaboration with the public**.

- The Planning Rule should encourage collaboration and partnerships with Tribal governments, ANCSA Native Corporations, local governments, international neighbors, and other stakeholders, both in NF management planning, and in planning for and implementing specific projects (e.g., renewable energy development, restoration, research).
- The Rule should require mandatory coordination with local communities and boroughs (counties) beyond just the normal NEPA scoping process. Planning teams should visit all communities that are surrounded by or substantially affected by National Forest management. It is important to come to the community to speak with local residents, including Tribal elders. Local forums are important not only during planning, but during plan implementation.

- Tribal consultation must happen throughout the planning process, not so close to the end of the process that it cannot inform the information, analysis and outcome.
- The traditional public involvement format, where each person provides comment without “collaborative” dialogue, is still favored by some. Concern that the type of collaborative process now being used for the national planning rule is not as effective in getting public comments on the record.
- Improvements to the current planning process are needed to achieve effective collaboration and public engagement. Planning processes should provide an opportunity for two-way dialogue, keep the public engaged (planning process not too drawn out), provide both formal and informal opportunities for public input, elicit local knowledge that goes back hundreds of years (or more), involve youth and “casual users”, and serve as a platform for educating the public about forest resources and management issues.
- The Rule should provide guidance on how input from different collaborators is weighed and applied. What is the role of traditional and local knowledge? What is the role of representatives of the scientific or academic community?

VIII. Plans could incorporate an “all-lands approach” by considering the relationship between NFS lands and neighboring lands.

- The Rule should incorporate an “all-lands” approach (which for some forests should also include consideration of adjacent waters). Examples of the need for this approach include planning to sustain functional watersheds, provide for viable and well-distributed species, provide for multiple use and development, and sustain communities surrounded by national forest land.
- The Planning Rule should set out a framework for Tribal governments and the Forest Service to work together to consider how management of federal and Tribal lands can be complimentary, and to consider co-management agreements.
- Concerns expressed about an all-lands approach include apprehension about the difficulty of getting all landowners to work together, concern that the approach would be cumbersome and could lead to an even longer planning process, and concern that the Forest Service would attempt to enlarge its jurisdiction and influence beyond NF boundaries.
- The All-Lands approach “goes both ways;” that is, it is important to consider how conditions and management on adjacent lands affects the National Forest, AND consider how management of NFS lands affects adjacent lands and communities.

IX. The planning process could be **based on the latest planning science and principles** to achieve the best decisions possible.

Roundtable participants offered the following various and diverse comments about the process for developing plans, adaptive management, and plan amendments/revisions (not consensus points, not prioritized).

- The new Planning Rule needs to be simpler and the process needs to be more efficient.
- Planning Rule must be fully responsive to NEPA.
- The NEPA process needs to be faster and completed at lower cost.
- The Rule should require existing forest plans to be revised and brought under the new Rule immediately, not wait for the normal revision timeframe for each plan.
- Forest planning and project planning need to be integrated across resources (e.g., timber planning integrated with planning and projects related to watersheds, restoration, access, etc.)
- Adaptive management needs to be implemented. Need to require monitoring of plan implementation and outcomes, to allow informed adaptive management.
- The Rule needs to allow for plans to adapt to changing conditions such as new economic opportunities (e.g., hydroelectric project) and changing environmental conditions (e.g., insect outbreak).
- Both technology and local conditions change very quickly. Plans need to be kept up to date in order to be useful.
- Rule should more clearly delineate what constitutes major changes in forest plans and what does not, so that minor changes could be addressed in a more streamlined process, without waiting for the full plan revision stage.
- The Forest Service should move toward going paperless in planning processes.
- Plans should be written in a way that are more legally severable; if one element is subject of legal challenge, the rest of plan could be implemented.
- The administrative appeal process for forest plans should be retained.

Conclusion

Participation at the Alaska Region's planning rule roundtable was substantial and active, as over 100 people participated in Juneau or via phone/internet. On-line evaluations (26% response rate) indicated that 75% of respondents strongly agreed or agreed that the roundtable meeting was productive.

Alaska Region roundtable participants recognize the substantial influence of Forest Service planning, actions, and decisions on the environment, economy and culture in large regions of Alaska, including effects on communities, families, and businesses. They will be closely watching the process as the new national Planning Rule is developed, and have high expectations that their input will be heard and used.

USDA Forest Service

Alaska Region – Roundtable to Discuss the National Planning Rule

Tuesday, April 13, 2010
Juneau, Alaska

Planning Rule Recording Worksheet

I. OVERVIEW OF THE MEETING

Meeting Location and Participants

Date of Meeting: April 13, 2010 2:00-5:00 p.m. and 6:00-8:00 p.m.

Location of Meeting (town, state): Juneau, Alaska, with interactive web/teleconference connection available to off-site participants

Number of meeting participants (estimated): 88 (2:00-5:00 p.m.); 20 (6:00-8:00 p.m.) – Afternoon tally includes 30 Americorps volunteers working with the Southeast Alaska Guidance Association (SAGA), including people from 17 different states. Tally also includes approximately eight phone/web participants in afternoon session and five phone/web participants in evening session.

The afternoon session was divided into four small groups after the plenary. Three groups addressed two substantive principles each (restoration, climate change, watershed, diversity, recreation, community economies). The fourth group was dedicated to the 30 SAGA volunteers, who were invited to discuss all aspects of the planning rule. All participants in the evening session stayed in one discussion group (discussion emphasis on process, regional flexibility, and community economies).

Please note the appropriate categories to indicate diversity in attendance at the meeting (to the extent possible): (indicated by X in table below)

Appendix 1 – Alaska Region, Planning Rule Recording Worksheet

Financial Users

- Oil and gas
- X Timber users
- X Outfitters
- X Ecotourism
- Ski Areas
- Grazing permit holders
- X OTHERS (including)
 - Mariculture
 - Mining
 - Communications/Energy
 - Aviation
 - ANSCA Native Corporations
 - Chambers of Commerce

Users

- X Off-road vehicle
- Mountain Bike
- Horse Riders
- X Hiker
- X Wilderness
- X Neighbor

Academic

- Science
- Economics
- Planning
- Adaptive Management
- Global Climate Change

NGOs

- X Endangered Species
- X Environmental Groups
- Sustainable Communities
- Environmental Justice
- X OTHERS (including)
 - First Things First Foundation
 - Southeast Conference

Other Governmental Entities

- Fish and Wildlife Service
- EPA
- BLM
- County Government
- X State Government (Fish & Game, Natural Resources, Transportation & Public Facilities)
- X Tribal Government
- X OTHERS including:
 - Local (city) governments
 - Congressional delegation staff
 - Americorps volunteers (30)

Forest Service Staff

- X Regional FS staff
- X National FS staff –including planning staff
- National Grasslands

OTHER

- X Media – newspaper, radio
- X Independent film producer

Points of Contact for the Worksheet Summarizer

Four facilitators assisted with the Alaska Region roundtable sessions:

- Jan Caulfield – independent facilitator, owner of Jan Caulfield Consulting (Afternoon: Community Economies, Climate Change; Evening: full group discussion)
- Kimberly Caringer – IECR (Afternoon: Watershed Health and Water, Diversity of Plants and Animal Species)
- Ken Post – USFS Regional office staff (Afternoon: Recreation, Restoration)

- Jeff Miller – USFS Regional office staff (Afternoon: discussion of all planning rule principles with 30-person Americorps volunteer group)

Name of person compiling these notes (from notes provided by discussion group note takers):

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Introduction to Alaska Region Roundtable – Simplified Worksheet Summary

The following worksheet presents the various and diverse comments made during facilitated group discussions at the April 13, 2010, Alaska Region roundtable, as well as written and email comments returned to the facilitator on the day of the roundtable. These comments were provided by individual roundtable participants, do not represent a consensus of group discussion, and are not prioritized in any way. (Relative emphasis and points of agreement/disagreement will be indicated in the roundtable summary report.) Written/email comments are listed at the end of each section, in *italics*.

The primary substantive principle of importance to participants in the Alaska Region Roundtable was “contribution to vibrant local community economies,” as evidenced by the attendance of over 45 people at the afternoon small group session on this topic, and the further extensive comment during the single group discussion session (15 participants) in the evening.

Topics that were not directly addressed are left blank in this worksheet. Much of the specific commentary in the worksheet is related to the “General” and “Plan Content” sections below, but is not repeated here.

X. General

1. What would a **GREAT planning rule** look like?

2. What **works now**; what concepts should be carried into the next rule?

- Suggested that the Forest Service conduct an internal review of what is now working well in the 1982 planning rule, gaps or deficiencies, emerging issues that aren’t addressed. This analysis should be shared with the public during this planning rule development process.
- The existing rule has a good section on biodiversity that should be maintained and will also be useful in dealing with climate change.

3. What **doesn’t work**; what concepts should be left behind?

XI. Plan Content

1. What **information and issues** do you want to see in a plan?

- 1982 planning rule does not address watershed health and climate change. These issues should be addressed in the new planning rule.
- Need more direction on renewable energy development.
- Planning rule needs to emphasize the Alaska National Interest Lands Conservation Act (ANILCA) Title VIII and give clear instruction for implementation of Title VIII in Alaska Region.
- All relevant public laws need to be referenced in the planning rule and considered in forest planning.

Written Comment

- *Planning rule needs to address implementation of National Energy Policy, which is not mentioned in the current planning rule or in any regional management plan.*
- *Planning rule should state that in case of conflict between the national planning rule and ANILCA Title VIII, the provisions of ANILCA prevail.*

2. Should the planning rule support the creation of a **shared vision** for each planning area? If so, how?

3. Should the new planning rule require **standards and guidelines** in all plans?

4. To what extent should the planning rule require **national consistency** and accommodate **regional differences**?

- Planning rule should include flexibility to respond to regional differences. Allow unique forest conditions to be considered in forest plans.
- Allow each Forest/Region to focus on the topics relevant to that area.
- Rule should avoid “one size fits all” approach and allow for locally- or regionally-tailored solutions. In Alaska, water and forest ecosystems are largely intact, which is different than in many National Forests.
- Concern that “one size fits all” planning rule will not work in Alaska Region because of the small regional population, isolated communities and large amount of Forest Service land (particularly in Southeast Alaska). Also, Alaskans often have a different perspective related to National Forest planning, than that found in the rest of the country.
- There are huge differences between public lands east of the Mississippi River, and west.
- Concerned that decisions will be made in Washington, D.C. that are not reflective or inclusive of needs in Alaska.

- The planning rule should deal with specific problems related to implementation of the roadless rule in Alaska. For example, areas designated for timber harvest cannot be harvested if roads are not developed.
- Alaska is unique in that the environment and economy are completely intertwined and healthy ecosystems here benefit the rest of the nation.
- Uncertain how national rule can address the extreme variation across the country and the different uses.
- Would there be a benefit to having a set of Regional Rule(s) instead of or in addition to the National Planning Rule? (Noted, however, that having nine different rules would likely lead to confusion and complication.)
- Planning rule should allow unique forest conditions to be addressed in each forest plan. Not too prescriptive.
- Planning rule should provide guidance/guidelines; standards should be developed at a more local level.

Written Comments

- *One size does not fit all. Issues on the Tongass NF will be very different than those encountered east of the Mississippi River.*
- *The planning rule should insure that regional needs take precedence over national policies.*
- *Planning rule should leave substantial flexibility to work out locally-tailored solutions; recommend against “one size fits all.” Alaska’s forests are comparatively healthy. Need to allow step-down plans to support local community needs.*

XII. Substantive Topics

Restoration – 19 small group participants (afternoon)

1. How can the next planning rule foster **restoration** of NFS lands?

- Discussion explored- “What does restoration mean to you in context of Forest Planning?”
 - Correcting deficiencies on the landscape or in ecosystems
 - Returning to previous condition or achieving a different condition
- Planning rule needs to define restoration and the actions it consists of.
- Need to define or determine what condition we are restoring to; we can restore to a desired future condition – may want to restore to a condition other than the pre-management condition
 - Restoration implies “go back to where you were.” This may not be possible – may need to have different management objectives
 - Ecosystem may not have been defined previously
 - Consider climate change – what state you restore to may be different under changing climatic conditions
 - Restoration occurs within a dynamic ecological system

- Improve ecosystems that have been harmed in the past – can recognize obvious deficiencies
- Need clear restoration objectives
- Desired outcome / future conditions depends what is going on in adjacent lands
- Desired future condition for restored area should be in keeping with the LUD prescriptions
- Collaboration would be necessary to define what is going to be restored and desired outcome
 - Restoration should be integrated for the various interested parties
 - Collaborate locally
- Restoring second growth forests to old growth status – Timber harvested areas should be focused to produce increased timber, if that was the original LUD. Restoration should be based on past management actions and past land use. Should transition into a young growth management scenario.
- Consider fire-dependent vs. non-fire-dependent ecosystems – acknowledge there are differences relative to restoration
- Restoration – opinion expressed that restoration is not appropriate topic for national planning rule.
- Planning rule should focus on sustainable ecosystems.
- Opinion expressed that restoration is a top priority.
- Planning rule should not over emphasize restoration as part of the planning rule. Restoration is very expensive; do not over emphasize – extent of emphasis on restoration should be relative to the amount of land that needs restoration on a forest. There may be better uses for funds.
- Restoration should follow LUD prescriptions and life cycle of land.
- Must ensure we have funds for restoration and analyze the investment for restoration.
- Planning rule should allow for restoration principles to be developed in the Forest Plans and provide a framework for consistency between management and other goals
 - Planning rule should serve as an inventory of places around the country where multiple resources have been lost- and guide for restoration relative to function
 - Planning rule provide guidance on monitoring techniques to follow correcting deficiency
 - If something happens on the forest- we may not want to put back the way it was- may want to restore to a different state- scientific analysis- may want to reclaim instead of restore
 - Rule could allow for a conversion of the land to something different than what is used to be- may be different

Written Comments

- *Where a forest is badly changed restoration is not possible; rebuilding is needed.*
- *The planning rule should not overemphasize restoration because it is very costly, most of the Tongass NF is undeveloped (unlike most other forests) and because the funds that could be spent on restoration could easily be spent on more pressing issues, such as supporting local economies.*

Appendix 1 – Alaska Region, Planning Rule Recording Worksheet

- *Restoration can be an important element, but should not replace timber as primary use on the Tongass NF. Rules should analyze the cost of restoration.*
- *Need to restore watersheds impaired by previous logging using best science and thinning prescriptions. Should redirect funds from logging roads and deficit timber sales to projects that restore and enhance habitats.*

Climate Change – 20 participants in small group discussion (afternoon)

1. How can the planning rule be proactive and innovative in addressing **climate change adaptation and mitigation**?

Mitigation

- Planning rule should be proactive in area of climate change mitigation by requiring planning for renewable energy development on Forest Service lands to reduce greenhouse gases (GHG). This is especially important in regions where communities currently rely on diesel power generation and regions that have the potential to export renewable energy to help reduce GHG elsewhere in the nation and internationally.
- It is time to deal with climate change. The 2008 Tongass NF plan said it would “deal with climate change in the future” as it was “uncertain.” Must not put this off.
- The rule should require partnering with appropriate entities to evaluate and pursue renewable energy. (For example, on the Tongass National Forest [NF] there is potential to export renewable energy through an electrical intertie along the Bradfield Canal to British Columbia. This will involve partnering with international governments, Canada’s First Nations, communities and energy companies.)
- The planning rule should address the potential for forests to trade in carbon credits. The Forest Service should be able to produce, buy, sell and trade carbon credits, with revenues being used to fund other agency programs.
- Can the planning rule include a process for addressing carbon offsets?
- When forest management alternatives are evaluated during forest planning and National Environmental Policy Act (NEPA) analysis, carbon sequestration and the effect of plan alternatives on carbon cycling / carbon balance should be evaluated.
- Alaska forests are large and have potential for large amounts of carbon sequestration. (Tongass NF is one of the top-10 NFs for sequestration.)
- Climate change may cause a paradigm shift away from viewing National Forests as a source of traditional goods and services (e.g., timber, recreation) to predominantly a source of carbon sequestration. Carbon management may eventually “trump” traditional resource considerations as the primary driver of National Forest planning and management decisions.
- If Alaskan forests are going to be the “lungs” of the country, then we should get paid for providing this ecosystem service.
- USFS needs to go greener, as an agency.

Adaptation

- The planning rule should recognize that management actions (and expectations for the landscape and ecosystem) must be adapted in response to the effects of a changing climate. For example, it may be contradictory to work to preserve yellow cedar in the Tongass NF, if new species that move into the area are more efficient at sequestering carbon. Is the goal always to preserve the “current” (2010) species assemblage and distribution?

- Plans should list species most at risk to climate change and provide guidance for future management if these species are impacted (e.g., emergency action authorities).

2. What, if any, climate change **assumptions** should be used in the development of plan alternatives?

There were very different views expressed at the Alaska Region Roundtable about whether climate change is a certainty that should be addressed in the planning rule and in forest plans, or not.

Important to Address Climate Change in Planning Rule

- Need to be proactive rather than reactive, as we know that there will be impacts from climate change, even if the impacts are uncertain.
- In order to maintain the wildlife and fisheries habitat that are key to economic development, a proactive stance on climate change must be taken.
- Evidence of climate change in Alaska’s forests include (mentioned at roundtable): higher tides, receding glaciers, loss of yellow cedar. Concern reduced water flow may impact potential for renewable hydroelectric energy projects.

Concerns about Addressing Climate Change in Planning Rule

- Should not overreact to climate change issue. Uncertain that climate change is a proven phenomenon. Nature can do a great deal of damage to the environment through natural disasters.
- Climate change is an idea that many are currently taken with; however, climatic variation may be due to natural changes, a continuation of climatic change the earth has always experienced. Concern with the assumption that climate change is “real” and should be addressed in FS planning.
- Need to be very careful using the idea of a carbon footprint in forest planning as it has the potential to significantly limit development, growth, economic opportunities and improvements to quality of life. Economic growth relies on technological innovation, which is driven by energy.
- Climate change is not within the jurisdiction of the Forest Service and dealing with it will slow down the forest planning processes. Instead, Forest Service should collaborate with other agencies, such as the Environmental Protection Agency.

Addressing Uncertainty About Climate Change Assumptions

- Planning rule should be based on the best science relating to climate change.
- Planning rule should emphasize climate monitoring. It is essential to monitor and try to determine what may be due to climate change and what might be a natural climatic progress.
- Need to assure resources are not wasted on climate change mitigation and adaptation when science is still controversial.

- Must also ascertain potential effects of changing climate (documented through monitoring) on forest ecosystems and resources.
- Need to apply risk management and assess the potential consequences of not being proactive in addressing climate change.
- To be useful, risk assessment model need to be based on local conditions and data. (Noted that Pacific Northwest Research Station has been doing excellent work on carbon cycling in Southeast Alaska forests.)

Written Comments

- *Include a standard requiring forest plans to maintain and where possible enhance moisture (e.g., humidity and in soil) and coolness in forests, within historic variability.*
- *Plans should promote the natural capacity of forests (both old- and young-growth) to capture and store carbon. Plans should include research into ways to best incorporate (e.g., thinning waste) carbon into soil and retain it.*
- *Standards and guidelines with regard to climate change must recognize potential impacts on other multiple uses, including a viable timber sale program.*
- *Potential for renewable energy projects on FS lands is significant economically and to offset GHGs.*
- *Tongass NF, a coastal temperate rainforest, can make significant contribution to mitigating climate change.*
- *Substantial concern that promoting harvest of woody biomass for production of biofuels (as under consideration by Tongass Futures Roundtable) would be a great mistake in Southeast Alaska; would simultaneously release massive amounts of stored carbon and deplete ability of Tongass NF to absorb carbon dioxide from the atmosphere. Non-combustion renewable resources (hydro, tidal, wave, geothermal, wind) are being overlooked.*
- *Existing Tongass Land and Resource Management Plan (2008) does not address climate change, saying that effects are uncertain and it will be dealt with in the future. Need proactive management for climate change; need to bring Tongass forest plan into compliance with new planning rule as soon as it is enacted, so it will address climate change, carbon sequestration.*

Water Resources and Watershed Health – 10 small group participants (afternoon)

2. Should forest planning be conducted in the context of **watersheds**? If so, how?

- Forest planning and project planning should be done at a watershed unit level.
- Organic enabling legislation, the National Forest Management Act (NFMA), addresses watershed health, but this was not carried into the 1982 planning rule.
- The 1982 planning rule does not address watershed health. We need to address watershed health and the role of watersheds in providing ecosystem services.
- The planning rule needs to address watershed health because this is so critical to the foundation of the National Forest Service system.

- The planning rule should establish a goal that watershed systems would be adequately managed; ensure the functioning of the watershed.
- The planning rule should talk about the maintenance of water flows.
- The rule should not be overly prescriptive, but needs to provide guidance/direction to preserve endemic processes within watersheds on National Forests.
- Noted that some forest management actions, such as timber programs that employ clear-cutting, may be detrimental to watersheds. The planning rule needs to consider this to protect watershed functionality.
- Establishing an outcome of watershed “health” is not useful, as you cannot measure achievement of that standard. Suggested terms: sustainability, quality, quantity – something that can be monitored, measured, assessed.
- In watersheds with multiple landowners, collaboration across all-lands will be necessary to address and sustain the functionality of the watershed. The planning rule should address the need for collaboration among different landowners, but should also provide direction to the Forest Service regarding the appropriate role and level of effort for the federal land owner(s) when there is not full cooperation or collaboration among all ownerships.
- Forest planning and project planning needs to be integrated across resources, so all resources are considered on a project basis.
- The planning rule should clearly state that resource management plans must be integrated (e.g., timber planning must also be integrated with watershed planning, restoration opportunities, access planning, etc.)
- Noted that The Nature Conservancy is very involved with the Forest Service in watershed health and restoration on the Tongass NF.

2. What if anything should the rule say about **water availability and quality**, including factors outside of the Agency’s control?

- Planning rule needs to be flexible (not prescriptive) regarding water quantity and quality, to account for wide local variation in precipitation and water availability.
- Need to look at precipitation data on a long-term basis, not an annual basis.
- Alaska Region has lots of water; we might want to export it someday, need to maintain water quality. Water may become increasingly valuable.

Written Comments

- *Clear-cutting has damaged watersheds worldwide and should never be allowed on any public lands.*
- *Needs to be a priority to permanently protect Tongass NF roadless areas and high value watersheds. Need to restore watersheds impaired by previous logging.*

Diversity of Plants and Animals – 10 small group participants (afternoon)

2. At what landscape scale and how should the Forest Service analyze and provide for **diversity of plants and animals** (individual unit, watershed, landscape scale)?

General comments about species diversity

- 1982 planning rule and NFMA guidance that populations must be “viable and well distributed” in regards to scale of the planning area, is language that should be retained.
- Should be planning for species *sustainability*, not viability, since sustainability is a higher standard.
- Planning rule cannot be prescriptive or rigid when addressing methodologies or techniques for addressing species diversity and sustainability; need to be able to be flexible and adaptive at the National Forest level on best methods/techniques.
- However, there must be accountability on maintaining sustainable populations (even if there is flexibility in specific effective approaches/actions).
- Forest plans address habitat management, but habitat only explains about 50% of species abundance. Species abundance and diversity is not just determined by habitat availability and quality.
- Planning rule needs to require a balance among different goals – We need to balance ecological sustainability with economic and social sustainability. We need to maintain sustainability of species *and* sustainability of communities.
- Planning rule should consider plant species sustainability, not just animal species.
- Forest Service needs to maintain a full “tool-box” of silviculture and harvest methods for managers to choose from and employ, to sustain healthy, functioning forests. Different plant species respond to different silviculture methods.
- Follow-up monitoring is essential to determining success and effectiveness of forest plans with regard to diversity; monitoring designed to test assumptions and outcomes of models.
- Suggested that for purposes of monitoring sustainability of diverse species assemblages, monitor with new technologies; consider monitoring focal species, management indicator species (MIS), or other approaches identified in the planning rule.
- Alternate suggestion that the planning rule *not* specify monitoring approaches such as focal species or MIS, but instead require monitoring that uses “best available science.” Don’t be overly prescriptive.
- Plans should list species and habitats that are vulnerable (e.g., to climate change) and the agency that has responsibility for taking action, especially in cases where emergency species management is necessary.
- Should consider local historical knowledge of animal population numbers; information should not be discounted if it is not scientifically collected.
- Adaptive management should be implemented (look at U.S. Department of Interior approach).
- Planning rule should allow for collaboration and partnering with stakeholders and coordination with adjacent landowners/governments/etc. in maintaining plant and animal communities.

Appropriate Scale for Considering Species Diversity

- Landscape scale should be the National Forest, or multiple Forests, depending on the species being considered.
- Suggest that planning rule reference scale of “one or more NF units.”
- May need to consider sustaining species diversity across multiple land ownerships (all-lands.)
- Abundance of species (plants and animals) on adjacent non-NFS lands (local, private, state) needs to be considered when developing forest plans.

Written Comments

- *Keep planning rule provision for viable population and wide distribution of wildlife and plant species, but make it stronger by changing it to be requirement for “sustainable populations” and their wide distribution.*
- *Wildlife diversity depends on a natural forest and is irreversibly damaged by clear-cutting.*
- *Must ensure that the planning rule secures biological viability for native species and ecological viability for natural dynamics and relationships.*

3. How should the planning rule guide monitoring and protection of **at-risk species** of animals and plants and their habitats?

- Species that are at-risk should be monitored.
- Monitoring needs to be done to test the assumptions and outcomes of models.
- Plan implementation needs to be monitored. Ask the hard questions – what are the actual outcomes of plan implementation?
- Need to consider adaptive management. Look at what U.S. Department of the Interior is doing.

Contribution to Vibrant Local Economies – 45 small group participants (afternoon); 15 is discussion group (evening)

1. What should the planning rule say about the **provision of goods and services** (including ecosystem services) that contribute to vibrant local, regional, and national economies?
2. How can the planning rule reflect the **interdependency of social, economic, and ecological systems** in a way that supports sustainable management of national forests and grasslands?

General Comments

- There needs to be a balance between conflicting needs and activities on the NFs, with no one use trumping others. Roundtable participants frequently used words such as balance,

multiple use, and sustainability. This is especially important in Southeast Alaska, given that the Forest Service is the dominant landowner in the region.

- Should consider need for changes to existing federal law to facilitate multiple use in NFs.
- Planning rule needs to expect and provide guidance for making trade-offs between forest plan priorities, uses and objectives.
- Communities that depend on economic activity on Forest Service lands need to see balance between the environment and economic development in forest plans.
- Need to balance conservation with preservation.
- Planning rule should acknowledge that community vitality and sustainability depends on multiple use and access to resources and development opportunities (e.g., utility and transportation corridors, hydroelectric sites, timber resources, minerals, etc.)
- The planning rule must require a realistic implementation plan, with actions, timelines and targets. This will allow businesses, communities and others to be able to plan for economic development, capitalize on funding opportunities, etc.
- The planning rule needs to address land ownership adjustments and exchanges to accommodate growing communities and Tribal land selections.
- Economic data needs to be accurate and relevant, and any assumptions or data limitations made clear. For example, in the Tongass NF, unemployment data for Skagway and Angoon is lumped together (due to census districts) and does not accurately represent either community. If accurate and relevant economic data is not available from other sources, scientists or other organizations, specifically for forest planning purposes, should collect it.
- Incorporate more data from State of Alaska sources into planning processes.
- Planning rule should reflect that local community and regional economic models are very different between different planning areas. Need to use economic models relevant to the planning area.
- Plans need to have integrity; those who invest capital in projects need to know that changes or legal challenges in the future won't impact business plans.
- Planning rule needs to "leave room for people," not just trees.
- Replace "economies" with the word "communities" in how we think about and how we approach our work.

Sustaining Community & Regional Economy (Especially in Southeast Alaska) Depends on Forest Service Actions

- Communities in Southeast Alaska are particularly economically fragile; the planning rule must consider that people live in communities within the National Forest. Local towns are dwindling (e.g., Wrangell was 4,000 people ten years ago, now down to 2,000.)
- Wild and intact ecosystems and vibrant communities go together; only by balancing these two will both be healthy.
- Planning rule should allow for reasonable community growth rate; plan must allow for families to raise their children and allow for sustainable community growth. There must be "room in the Rule for people."

- Communities have been in Southeast Alaska for 10,000 years; the Tongass NF only for 100 years.
- Consideration of economic issues in forest plans is very important for the Alaska Region.
- Alternative analysis in forest plans must clearly indicate what uses are being displaced, and what would be the economic effect and cost of the action.
- Planning rule should require regional economic analysis to capture changing conditions and new opportunities. This is especially important in Alaska where economic conditions and challenges are unique. This economic impact analysis should be cross-generational, providing insight into impacts on younger Americans and their future in the region.
- Forest plans need to document and evaluate impact of forest service actions on local economy, including costs and benefits.
- Forest Service is such a large landowner (particularly in Southeast Alaska), that they need to consider the wide range of activities that the private economic development sector would consider.
- The Forest Service needs to be honest with communities about the economic future; plans must be based on an honest assessment of current economic conditions, and realistically face the difficulty of finding solutions to large, complex economic problems.
- Forest Service revenues are declining and impacting funding to schools. Continuing assistance to communities for secure rural schools is essential to community sustainability.
- Need to be aware that in Alaska, a Forest Service decision can make or break a community's future. District Rangers have a lot of authority to make decisions and affect outcomes.

Economic Sectors

Comments were made about the importance of recognizing the wide range of economic sectors in the planning rule and in forest plans.

- Timber
 - Forest plans should set out timber targets and identify specific areas so that businesses know what to expect.
 - Need to focus economic development on the unique kinds of timber resources we have in Alaska (e.g., Sitka spruce of quality for musical instruments).
 - Important to provide annual consistent supply of timber, to allow businesses to get established and invest in infrastructure. Variability in supply is a killer for industry.
 - Increased timber harvest in Alaska will decrease worldwide deforestation problems.
 - Commercial timber harvest can be done without upsetting ecosystem or threatening species. Timber development should be allowed.
 - Tongass NF is 30 years away from a second growth timber-based economy.
 - Timber harvest should be permitted at a scale that will allow other activities to occur within healthy ecosystems.
 - Need to shift community economies from dependence on timber harvests to a more balanced economy, with a focus on restoration and sustainability.
 - Small projects can have a bigger long-term economic impact than large timber sales.
 - In the past, guaranteed timber harvest board footage had led to problems; need to stay away from these types of guarantees.

- Planning in the Tongass NF gets “high-centered” on timber. Timber can play a role, but it has to be at a scale that allows us to look at all the other needs and maintain a healthy ecosystem.
- Subsistence – Important/essential to local food economy; food security
 - Planning rule should address food security, specifically subsistence food sources and activities. This includes defining relevant terms and addressing access issues.
 - Planning rule needs to include a framework for the implementation of the Alaska National Interest Lands Conservation Act (ANILCA). To honor conditions in Alaska, the Planning Rule needs to be clear that ANILCA prevails over forest plans.
 - Communities want control of subsistence activities (especially important for communities totally surrounded by Forest Service land.)
- Mining
 - Roadless rule makes mineral development difficult.
 - Areas with mineral development potential and access to these areas must be considered in planning.
 - Everything in the world is “either grown, or mined.” Mineral development is very important.
- Communication
 - Forest service planning needs to consider the communication needs (e.g., tower locations, etc) of communities. Communication needs are especially important for isolated communities in Southeast Alaska. Key communication sites should be identified and access provided in planning.
- Energy
 - Forest service planning needs to be integrated with planning for energy development and transmission lines on both a local and national level.
 - Planning rule needs to address renewable energy. This is important nationwide (especially given climate change). It is essential to small communities in Alaska Region, as energy costs are so high.
 - Plans need to support local economic plans, projects and strategies, especially related to renewable energy.
 - Need to focus on renewable energy projects in communities where energy costs are very high. Give higher priority to renewable energy projects that serve a local community.
 - Hydroelectric projects are important as they can create jobs and lower energy costs in small isolated towns. These projects take a long time to develop (18-25 years), so need to get started right away.
 - Need more timely approvals for energy projects – a delay or “No” on a permit affects the economy.
- Transportation
 - Forest service transportation planning needs to be integrated with Tribal road planning and State transportation planning. All modes of transportation (ferry, barge, motorized vehicle, float and winged planes) must be considered. Lack of coordination wastes energy and resources and results in decreased access for communities.
 - Plans need to consider revising land use designations and altering transportation corridors that have technical obstacles.

- Plans need to address aviation needs – in terms of wheeled aircraft strips and floatplane access. This is important for both economics and safety.
- Fisheries
 - Fisheries and productive fish habitat are an important part of the economic picture for forest planning in Alaska. Income to commercial fishermen, subsistence, communities, related businesses and suppliers; huge food/protein/Omega-3 source.
 - State and federal fisheries management should be better coordinated.
- Ecosystem Services – Planning rule should consider ecological goods and services produced by the forest and their global importance.
- Local economic production of goods and services reduces the need to import; environmentally responsible to use local products and reduce fuel used in shipping
- Restoration economy – Need to develop community economies based on restoration and sustainability
- Access is essential – for mining, renewable energy projects, timber, recreation/guiding, etc. Should not keep turning down access in Wilderness. Concern about roadless rule affect on needed access.

Forest Service Actions – Direct Effects on Jobs and Entrepreneurs

- Emphasis needs to be placed on economic development that leads to sustainable year round jobs.
- Need to avoid boom/bust economies.
- Local hire by USFS is important, especially in communities located within the NF.
- Maximizing value-added processing will help sustain local economies.
- Alaskans are independent and entrepreneurial; can prosper if given opportunity to operate.
- USDA laws that govern contract services need to be updated so that there is more emphasis on / interaction with communities, this will help strengthen local economies.
- Forest Plans need to allow for a number of different, flexible contracting authorities for delivering goods and services. This could include flexibility on stewardship contracts, traditional contracting, or the Good Neighbor Authority. There should be more interaction with local communities for contracting, so they get benefit of doing work with Forest Service.
- Planning rule should set out framework for coordination with other federal programs (specifically mentioned USDA programs like the stewardship program).
- The Forest Service should make it simpler for the public to start forest related business (e.g., small business use of forest resources; difficult to get special forest products permits). A lot of planning time is spent on traditional uses (e.g., timber sales) and more time should be spent laying the way for smaller, entrepreneurial projects.
- Forest Service permitting system makes it difficult to get a permit for commercial activity. These restrictions have hindered local economic development.

Adaptive Management relative to changing economic conditions & opportunities

- Economic opportunities come and go quickly, and communities need the flexibility to react. This is especially important in remote and isolated areas.
- Need to have an “opportunity clause,” so can take advantage of changing economic conditions and opportunities that arise.
- Forest Service needs to monitor / track community economic conditions (e.g., energy costs, unemployment) and be able to adapt its management to address community sustainability. Flexibility needed in planning rule and forest plans to allow for adaptation to changing economic conditions and community sustainability needs.
- Should not need to go through a full plan amendment process to be able to address need for access, etc., that was not anticipated in the initial plan.

Written Comments

General:

- *The national planning rule should require that forest plans address and incorporate the economic concerns of affected communities surrounded by National Forest.*
- *Primarily interested in development of rules that actually facilitate multiple use of the forests, particularly issues related to strong, vibrant economies. In addition to the needs of the USFS to use prudent methods to sustain the incredible resources we all value, we must also place a very high value on the need of the people who live in our region to make a life and a living. Communities and families need to be sustained.*
- *A vibrant economy depends on providing for everyone as described in the Multiple Use Act.*
- *The planning rule should address full implementation of forest plans. Hard targets and incentives should be used to encourage full implementation.*
- *If we are to provide economic security to the region, we must provide for long-term employment opportunity for local residents. The sources of capital that need to be married with the local labor force need to feel secure that the rules won't change in the middle of the capital expenditure process. If this can be assured to a reasonable extent, economic growth will result.*
- *Planning rule must include true multiple use management, including timber harvesting. Focus on statutory direction of the Multiple Use Sustained Yield Act and NFMA. “Restoration, resilience and collaboration” are not listed as multiple use objectives in the statutes. Must have balance in uses.*
- *Need to allow balanced human use, important to people of the region, not as a “look, but don't touch” asset of the federal government.*
- *Planning rule must state that forest plans must strive for balance between environmental impacts with social/economic impacts to residents. NEPA document should analyze effects on economy, but plan needs to allow modification/adjustments to address future, unanticipated or underestimated impacts. Need to allow siting of facilities needed by communities on USFS land.*
- *Future growth and changes in technology should be addressed in planning rule; e.g., future technology may allow additional mining activities.*
- *Forest planning process should evaluate past historic uses and plans of the National Forest – considering how to develop future plans that can better serve the communities dependent on these forests. (Attached essay by Dr. Walter Soboleff on “The past and future of the Tongass,” published in Juneau Empire, April 8, 2008*

Timber

- *The planning rule must require forest plans to set targets for commodity production and designate where the commodity will come from by requiring the plan to include schedules, show how much and where the commodity will come from. A ten-year sale plan must be part of the forest plan.*
- *Restoration economy is not a replacement for commodity production. There is no wealth creation in restoration projects – it is all taxpayer funded. What restoration is done should be accomplished under a viable timber sale program.*
- *Lack of timber sales in Southeast Alaska has caused a great loss to the economy, affecting receipts for schools, business, shipping and families' livelihoods.*
- *Implementable timber program – Must insure that forest plans are fully implementable, with implementable timber sale program that: (1) is adequate to meet needs of timber industry in each region; (2) will support economically viable timber sale program.*
- *Must have effective timber use plan. Use 100-year rotation; remove stipulation of harvesting low quality/pulp wood; do not require value-added processing; insist upon precommercial thinning. Would provide employment, enhance wildlife habitat (thinning).*
- *Stop export policies that allow unprocessed timber to be exported.*
- *Need to act on forest restoration project immediately (specific project proposed by Ketchikan Gateway Borough) to avoid liquidating local mill and provide employment/support for local economy. Closing roads and removing access will preclude future logging of second growth.*

Energy

- *Prioritize (encourage) forest uses such as alternative energy (geothermal, wind, water, wave). Renewable energy development would support local economies with little or no adverse ecological effects. Lower energy costs, decrease carbon footprint, energize local economies.*
- *Potential for renewable energy projects on FS lands is significant economically and to offset GHGs. Many communities in Southeast Alaska are still reliant on diesel power generation that affects them economically, socially and pollutes the environment. Planning rule should support renewable energy projects; would offset GHG anywhere that can be reached by a renewable energy grid.*
- *Planning rule must support multiple uses and in particular the renewable energy policy.*
- *All USFS plans should address opportunities to produce more affordable, renewable and sustainable energy for all NF dependent communities (e.g., Southeast Alaska hydropower for regional use and export via intertie). National planning rule should mandate partnerships with states, communities, Tribal governments and adjacent governments to pursue and develop renewable energy projects. (Attached summary of "Northwest Power Line Coalition.")*
- *Do not overlook Southeast Alaska's non-combustion renewable resources (hydro, tidal, wave, geothermal, wind).*

Fisheries

- *Fishing is an important element of our economy and ecosystem. Fisheries management needs to be collaborative if different agencies are responsible for caring for different parts of shared habitats/economies.*
- *As a rural resident involved in the shellfish mariculture industry, would like to see USFS encouraging "green" industry opportunities within the Tongass NF.*

- *USDA should work with the Economic Development Agency (EDA) to review programs and policies to assist the creation of a shellfish-mariculture industry in coastal Alaska. Would bring industry/employment to rural coastal Alaska. Need federal (and state) landowners to permit use.*
- *Fish should be promoted as the most important forest product to come from the Tongass NF.*

Tourism / Recreation

- *Planning rule should provide for increased access to USFS lands for guiding. Give priority to these activities, as they facilitate access for general public to visit areas they could not otherwise visit. Outfitter/guides provide high economic return to communities with relatively low environmental impact.*

Multiple Resources /Economic Sectors

- *Planning rule should recognize and allow for needs of mining and tourism industries.*
- *Planning rule should allow for Tongass NF to be used for sound resource extraction of timber and minerals, and allow corridors for power line grids.*
- *Increase budget for managing tourism, recreation, hunting, fishing and subsistence uses – to contribute to regional economy.*

Recreation – Use and Enjoyment of NFS Lands – 5 small group participants (afternoon)

1. What if anything should the planning rule say about **suitable uses** and/or **places of interest**?

2. What should the planning rule say about recreation **access, visitor facilities, and services**?

- Planning rule should address permit fees – how equitable fees are charged, developed and changes are implemented; include local consideration in development of fees
- Areas considered for modification should consider access; infrastructure should be given high priority access for off-highway uses.
- Wilderness – should be prioritized for foot access.
- Travel management plan should be consistent with the land use designation (LUD). Development LUDs should be opened; non-development LUD should be closed unless specified.
- Planning rule should provide for public access for consumptive and non-consumptive access (e.g., viewing, fishing, hunting).
- Plans should address public access for motorized and non-motorized to FS managed land by land, water, and air.
- Established trails and public uses should be kept when lands get transferred to different ownership.
- Planning rule should address the role of wilderness FS cabins and trails.

Written Comments

- *Applaud diversification of Tongass NF from predominantly logging to putting more resources toward recreation. However, existing cabins have been slated for or have been demolished. FS needs to be more innovative in how to fund cabin maintenance. Involve public by encouraging volunteers or adopt-a-cabin program. Provide flexibility to Wilderness rules, to allow volunteer work party to make repairs with power tools.*
- *Forest plans should allow for use of motorized vehicles. Concerned that bridges and culverts are being removed and access lost; should allow volunteers to maintain these access roads.*
- *Because it can be accessed by marine waters, Tongass NF is in unique position to provide access for visitation in a low impact way.*

XIII. Process

There were no small group discussions at the Alaska Region Roundtable focused on process principles. Comments noted below were raised during the evening roundtable (which did not break into small groups), in afternoon small groups addressing different topic areas, or in written/email comments.

Plan Revision and NEPA

1. What are your suggestions for making forest planning **faster, simpler, more straightforward, and less expensive?**

- New planning rule needs to be simpler and the process needs to be more efficient.

Written Comment

- *Pay very close attention to the integrity of the planning process.*
- *Must ensure that the planning rule is fully responsive to NEPA.*
- *Concern that existing forest plans (e.g., Tongass NF) should be revised and brought under the new planning rule as soon as it is enacted. Otherwise, the Tongass forest plan may not be managed under the new rule until 2019. This is an extremely serious problem, as the 2008 forest plan does not adequately deal with climate change – and there is no recognition in the forest plan for essential role of this forest in carbon sequestration.*

2. How often should **plan revisions** occur; should the entire forest plan be redone in each revision cycle?

Written Comment

- *Planning rule should more clearly delineate what constitutes major changes in forest plans and what does not, so that minor changes could be addressed in a more streamlined process, without waiting for the full plan revision stage.*

3. What should the rule say about complying with **NEPA?**

- Need to lower NEPA compliance cost and shorten NEPA timeframe.
- NEPA process needs to be faster.

Written Comments

- *Planning rule should allow NEPA documents to be prepared quickly and with minimal cost.*

Adaptive Management

1. How can a new planning rule build in **flexibility to adapt** to changing science, information or conditions and/or incorporate new data?

- *(Point raised in species diversity discussion group):* Adaptive management needs to be implemented. Look closely at what U.S. Department of the Interior is doing.
- *(Point raised in species diversity discussion group):* Need to require monitoring of plan implementation and outcomes, to allow informed adaptive management.
- Plan needs to provide for the flexibility to be able to adapt to both economic opportunities (e.g., hydroelectric project) and changing environmental conditions (e.g., insect outbreak).
- Both technology and local conditions change very quickly. Plans need to be kept up to date in order to be useful.

2. When and how should plans be **evaluated** to see if they are working; what should trigger **amendments**?

- Plans need to not be so specific as to require a plan amendment for any change in conditions (e.g., need to be able to identify and provide access corridors for energy development without a plan amendment).
- Plan amendments have been used in Alaska as way of dealing with a difference in opinion about a specific issue. It would be better to deal with this sort of problem upfront during the planning process.

Collaboration and Coordination

1. How should **stakeholders, other agencies, and governments be involved** in the planning process?

- The planning rule should encourage partnerships with Tribal governments, ANCSA Native Corporations, local governments and international neighbors.
- Drawn-out planning process makes it very difficult for the public to stay involved.
- Tribal Consultation process should happen throughout the planning process, not so close to the end of the process that it cannot influence the outcome.
- ‘Collaboration’ is a word with many definitions; collaboration among scientists, collaboration among landowners, etc.

- The “traditional” public involvement format, where each person provides comment without collaborative dialogue, is still valuable. The type of “collaborative” process now being used for the national planning rule is not as effective in getting public comments on the record.
- Collaboration is a valuable part of the process as it allows groups with different goals and perspectives to work through issues and can result in a better product. (The Juneau Snowmobile Club, for example, has been involved in several successful collaborative projects in the Tongass NF.)
- The current planning process is based on a one-way information flow, with the Forest Service coming into communities looking for input, but not providing answers to the public’s questions. This process design misses an opportunity for real dialogue.
- Some people are uncomfortable speaking up in a formal setting; need to have informal opportunities for input as it will result in a wider cross-section of the public being involved in the process.
- It is good to include the public in all issues, such as this planning rule rewrite.
- Planning teams should visit specific communities that are surrounded by or substantially affected by National Forest management (e.g., the village of Angoon, Alaska, is surrounded by the Admiralty Island National Monument). It is important to come to the community speak with local residents, including Tribal elders.
- Hold local forums to share information, to synthesize, to capture local understandings that go back hundreds of years (or more).
- Bureaucracy and top heavy organization can hold up local action and local planning processes.
- Forest Service needs to find a way to coordinate with local governments, Tribes, ANCSA Native Corporations and private landowners without telling them how to manage their lands.
- All citizens of the U.S. are stakeholders in National Forest planning.
- Decisions about management of land and water should give high consideration to local knowledge (e.g., including traditional ecological knowledge), in addition to the best science.
- Need to be able to capture opinions of “casual users” and those who are not generally aware of forest plans and planning processes.
- There are so many stakeholders involved that it will be difficult to provide a balance.
- The rule-making and planning process provides an opportunity to provide conservation education to the public and should be used as such. Must have an effective education process prior to collaboration to get adequate stakeholder input.
- Need local forums to allow locals the opportunity to provide input not only during the planning process, but also during the implementation and maintenance of the forest plan. Engage the public in the ongoing discussions of the management of the plan to encourage an appreciation of the National Forests and give them a sense of ownership.
- Need to encourage more public involvement especially young people in the land and resource management and planning process.
- Need to consider how input from different collaborators is weighed; does science have a higher priority than the layman?

- Encourage collaboration in research and on-the-ground projects, as well as planning. (e.g., The Nature Conservancy [TNC] and Audubon are involved in research on Tongass NF, and TNC involved as partner with FS in watershed restoration.)
- Local residents must feel enfranchised in the planning process, not disenfranchised.
- USFS should do more outreach, engagement, collaboration with Americorps volunteers, to engage and guide the next generation of public leaders.

Written Comments

- *Need meaningful consultation and collaboration with Alaska Native Corporations and Tribal governments; collaboration with adjacent landowners and managers.*
- *Please include all small communities in planning process by visiting there (Native and non-Native communities, alike). This really affects our towns and it is difficult to come into the “big” cities to participate.*
- *USFS should enter into co-management with Tribal governments and ANCSA corporations within the Tongass NF, to attain the most effective and proactive collaboration with private, public and Tribal interests. This all-lands approach and planning process will achieve the best decisions. Essential to interpret ANILCA Title VIII to the benefit of the original People of the Tongass.*
- *Coordination with local communities and boroughs should be mandatory beyond the normal NEPA scoping process.*
- *Planning rule should specify that during public input process, mass-mailed form letters will be accounted for separately, rather than given equal weight to individual comment letters.*

2. What kind of **administrative review process** should be offered to the public in the planning rule? (E.g. pre-decisional objections and/or post-decisional appeal processes?)

Written Comment

- *Appeal process should be retained.*

3. Should the forest planning process move to an **all-lands approach**? If so how?

- *(Point raised in watershed health discussion group):* In watersheds with multiple landowners, collaboration across all-lands will be necessary to address and sustain the functionality of the watershed. The planning rule should address the need for collaboration among different landowners, but should also provide direction to the Forest Service regarding the appropriate role and level of effort for the federal land owner(s) when there is not full cooperation or collaboration among all owners.
- *(Point raised in species diversity discussion group):* Need to address sustaining species diversity at a landscape scale; this may require collaboration across multiple land ownerships (all-lands).
- Forest Service must look at ways to coordinate with adjacent landowners, but must not try to enlarge its jurisdiction beyond NF boundaries.

- Planning rule can better address economic development if planning is coordinated with adjacent landowners.
- Planning rule should consider the goals, objectives and plans of adjacent landowners, local governments and Tribes.
- Planning rule should set out a framework for Tribal governments and the Forest Service to work together under co-management agreements, with the roles of each party clearly defined.
- Need to consider how management of federal and Tribal lands can be complimentary.
- All-lands approach would result in more conservation and coordinated actions among neighboring landowners.
- All-lands approach is critical in the Tongass NF in Southeast Alaska, because small communities are integrated into the Forest.
- All-lands approach will also make it possible to manage lands at an ecosystem level.
- Need to consider and react to activities outside of the boundaries of the National Forests and address issues such as aerial over flights.
- Apprehensive about the all-lands approach into practice as it will be difficult to get all landowners working together.
- All-lands approach can be more cumbersome and could lead to an even longer planning process.
- All-lands approach “goes both ways;” that is, consider how management of adjacent lands affects the National Forest, AND consider how management of NFS lands affects other landownership’s. Need to recognize ripple effects of FS actions on adjacent lands.

Written Comments

- *Important to not only take an all-lands approach, but also to include surrounding marine waters. Marine waters are critical to developing appropriate transportation systems and assessment impacts of changing uses on land or water, on the other. Land and marine waters are critically tied together on both the Tongass and Chugach NFs.*

XIV. Other Comments and Suggestions

- The planning rule should require plans to incorporate other legislation that will affect management of uses and activities in the National Forest, such as ANILCA.
- The problem with forest planning is that we are looking for a “technical solution” to a political problem. We need to recognize that no matter how good the planning process, there are limits to technical solutions.
- (Point raised in context of watershed health discussion group): Forest planning and project planning needs to be integrated across resources, so all resources are considered on a project basis. The planning rule should clearly state that resource management and project planning must be integrated (e.g., timber planning must be integrated with planning and projects related to watersheds, restoration, access for economic development or recreation, etc.)

- Plans need to reflect the fact that wilderness means something different in Alaska than in other National Forests.
- Forest service should move toward going paperless in planning processes (including issuance of Record of Decision).
- Planning rule should improve the preservation of cultural resources.
- Planning rule should consider traditional knowledge alongside science as important input to the planning process.
- Plans need to be written to be more legally severable; if one element of the plan was subject to a legal challenge, the rest of the plan would remain intact.
- Need to address the need for “green” resources.
- Avoid irreversible resource damage; maintain the integrity and vitality of the ecosystem.
- Agency needs to organizationally and culturally build in leadership by members of younger generations.
- Need to educate more recent forest users about traditional uses of the land.

Written Comments – General to Planning Rule

- *Substantive topics for discussion should be: regional and local decision-making priorities and systems, and regional and local management principles.*
- *Best science and mathematical formulations conceived for Lower 48 states don't always apply to Southeast Alaska.*
- *Local traditional knowledge needs to be given value, and priority in determining value to local and regional resources.*
- *The 1982 planning rule has numerous applications and should be added to (not replaced) under this new planning rule process.*
- *There is no need to conduct additional Wilderness or roadless area reviews in Alaska. Between ANILCA and the Tongass Timber Reform Act of 1990, these issues should be considered settled.*

Written Comments – Focused on this collaborative public process re: planning rule

- *Prefer good, old-fashioned “public involvement” to this so-called collaborative process for the planning rule development. This is too limiting and framed. Collaboration among scientists and among landowners makes sense, but those instances are different.*
- *Requiring public comments to be submitted on the day of the roundtable is too confining. Public should be afforded ample time for thoughtful reflection and comment.*
- *Roundtable is about “planning for planning” – quite abstract. But appreciate public being involved so early in process.*
- *Move in right direction. Problem is to assimilate information and then get it to the public so that it is understood. In other words, progress of issues needs to be presented to public in an ongoing manner – not too late in the process to be corrected by public response.*

Appendix 2 – Copies of Written & Email Comments

The attached comments were submitted by participants at the Alaska Region roundtable or submitted via email at the time of the roundtable.

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): Don Bremner

Email Address (Optional): dbremner@gsi.net

Please share your input on the new Planning Rule process.

substantive topics for discussion should be:

1. Regional + local decision-making ~~prior~~ priorities
2. Regional + local decision-making systems
3. Regional + local management Principles -
4. Best science + mathematical formulations conceived for lower 48 states don't always apply to S.E. Alaska
5. Local traditional + knowledge needs to be given value, and priority in determining value to local + regional resources,
6. The 1982 Rule has numerous applications + should be added to under this new planning rule process.

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): Carol Cairnes

Email Address (Optional): ccairnes@gmail.com

Please share your input on the new Planning Rule process.

The Tongass National Forest, because it is a coastal temperate rain forest, can make a significant contribution to mitigating climate change. The Tongass deserves recognition for being the unique ecosystem that it is. Because it is completely surrounded by the Pacific Ocean it is in a unique position to provide ~~an~~ an opportunity for American's to visit their largest National Forest in a low impact way. The Tongass also contains the habitat for a high quality, healthy protein source in the wild Alaska salmon, a great source of omega 3 fatty acids. The Forest Service would do well to promote fish as the most important forest product to come from the Tongass.

Woody Biomass, Carbon, Climate Change and the Tongass Futures Roundtable

Dave Beebe 24 Feb. 09



Introduction

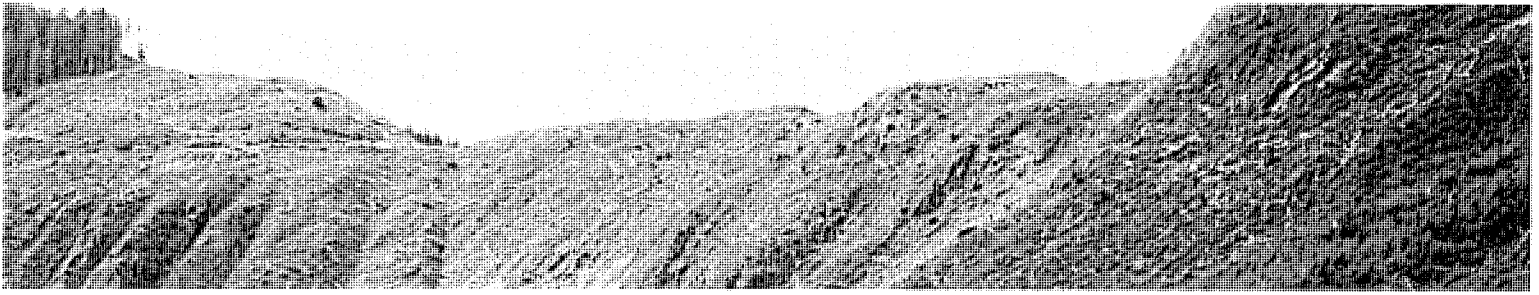
The Tongass Futures Roundtable (TFR), a collaborative effort of stakeholders addressing public policy issues on the Tongass National Forest and Southeast Alaska, is now considering the use of sawmill waste and small diameter cordwood (referred to as woody biomass) from Southeast Alaska's forests as a potential source of biofuels.

This proposal purports to address three concerns facing the region: the need to fund forest restoration, increasing energy costs and the need to reduce dependence on fossil fuels. First, there are enormous costs associated with maintaining nearly a million acres of clearcuts in Southeast Alaska. There is a substantial backlog of commercial thinning and forest restoration overdue on state, federal and native corporate timberlands. The second concern stems from the economic hardships created by the recent spike in the cost of petroleum fuel products used for heating and generation of electricity in rural communities of Southeast Alaska. Finally, climate change mitigation requires a national effort to reduce dependency on fossil fuel by switching to renewable energy resources.

Now that the economic stimulus bill has been signed, a rapid distribution of funds is in the offing. Some on the TFR perceive the economic stimulus plan as an opportunity to seek subsidies for the timber industry to fund commercial thinning (rebranded as "stewardship", and "restoration"), and, it is claimed, measures to restore ecosystem integrity. The proponents hope to use much of the resulting woody biomass, along with sawmill waste, to heat municipal and other public buildings. The stimulus bill would also fund the associated infrastructure costs, including large scale road construction.

Overview -- The Proposal Before the Roundtable

The present TFR proposal is the first large scale plan to employ woody biomass energy systems in Southeast Alaska, but the concept is well underway across the United States. An extensive national biofuel program is being developed, purportedly, to address national security, economic, and climate change concerns. Three quarters of greenhouse gas emissions (primarily CO₂) result from fossil fuel combustion. Deforestation and agricultural practices dominate the remaining greenhouse gas emissions.



Forests play a vital role in absorbing CO₂ from the atmosphere and storing carbon. Over half of the stored carbon litters the forest floor as fine and coarse woody debris (CWD) and is stored in the soil. CWD also provides habitat for animals of all sizes, both vertebrate and invertebrate. Biomass is to biofuel as CWD is to healthy forest ecosystems.

The TFR proponents of biomass removal justify it as habitat restoration, but this reasoning is fundamentally flawed. Eventual planned timber harvest of the second growth, ultimately, results in restoring clearcuts -- not habitat. Commercial thinning represents, at best, only temporary improvement due to ensuing canopy closure within 20 years. Centuries are required to restore oldgrowth structure and function in the aftermath of clearcutting old-growth habitat.

Past failures to maintain well distributed and viable populations of oldgrowth dependent species can be directly attributed to either ignoring scientists' warnings of foreseeable consequences or proceeding with large scale management activities in the absence of a complete scientific understanding of the consequences. Examples of threatened species from other regions include the spotted owl, marbled murrelet, and red cockaded woodpecker. Such is the case with present discussions at the TFR around woody biomass energy systems dependent upon the removal of massive quantities of organic material, *labeled as waste*, from the forest.

While very little science has been applied to the long term effects of large scale biomass removal from the second growth stands of Southeast Alaska, there is a rich body of science to draw from where biomass removal has already occurred elsewhere in the United States. Scientists working at the Division of Agriculture's Forest Resources Center at the University of Arkansas presented to the Ecological Society of America (March 2008) "Conference on the Ecological Dimensions of Biofuels" stating their findings and concerns:

Woody debris in a forest is important to populations of vertebrates (Harmon, et al. 1986, Freedman et al. 1996) as well as invertebrates (Caldwell, 1996) and insects (Hanula 1996). Removal of logging slash can negatively impact small mammals, birds, (Butts and McComb 2000), and influence invertebrate (Caldwell, R.S. 1996) and insect (Hanula 1996) community composition and structure.

Coarse woody debris is an important indicator of species abundance (Carey and Johnson 1995). McCay and Komoroski (2004) found that removal of woody debris lowered shrew populations, Carey and Johnson (1995) found that levels of coarse woody debris of less than 15-20% were not adequate to maintain small mammal populations. The total quantity, size, and distribution and decay status of woody debris in a forest are important in determining habitat quality (Miller and Getz 1977 and Maser and Trappe 1984).

Holly K. Gibbs (University of Wisconsin-Madison) offered this insight in her presentation at the Ecological Society of America's Conference on the Ecological Dimensions of Biofuels:

"... biofuel crop expansion into carbon-rich forests may lead to carbon deficits lasting several decades to millennia because the loss of carbon from deforestation far exceeds carbon savings from biofuel substitution of fossil fuels."



Overlooked -- Southeast's *Non-Combustion* Renewable Resources

Southeast Alaska possesses vast reserves of underutilized renewable energy capacities which don't threaten the array of ecosystem services provided by intact watersheds. Such renewable energy alternatives don't incur widespread fish and wildlife habitat degradation, nor do they release massive quantities of CO₂, nor do they contribute to ocean acidification and climate change accelerating black carbon emissions.

These options include:

- **Hydropower** Southeast Alaska on average, receives between 150 to 560 cm. of precipitation a year allowing for countless sources for small, medium and large hydropower sites often adjacent to towns.
- **Tidal power and Wave energy** Many areas of Southeast have 20 foot tidal exchanges occurring in 6 hours while new technology can generate electricity even in slower saltwater or freshwater currents.
- **Geothermal** Alaska has more geothermal resources than any other state in the country. There are at least 19 known potential sites (and likely many more) in Southeast.
- **Wind energy** According to the Dept. of Energy's National Renewable Energy Lab, Alaska possesses 99% of the best wind energy sites in the entire United States.

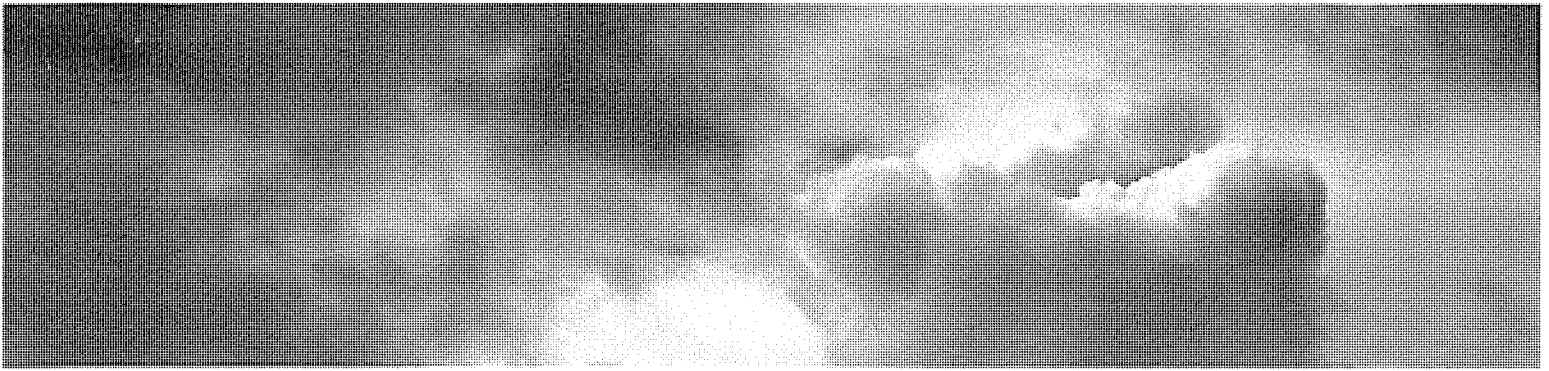
Overshoot -- Carbon Accumulation & the Myth of Carbon-Neutral Wood Heat

Despite these world-class, highly promising renewable energy sources, TFR's membership and direction has been dominated by a self-serving and singular focus on woody biomass. TFR discussions have disregarded how biomass removal and combustion adds to carbon emissions. If reducing carbon emissions is truly the intent of TFR, why has there been no acknowledgement of the massive carbon emissions resulting from clearcutting, road building and silvicultural treatments?

Scientists estimate that worldwide deforestation accounts for up to 25% of greenhouse gas emissions necessitating urgent reductions in timber harvest. In their scientific paper, "Target Atmospheric CO₂: Where should Humanity Aim?," Dr. James Hansen and others advised unequivocally:

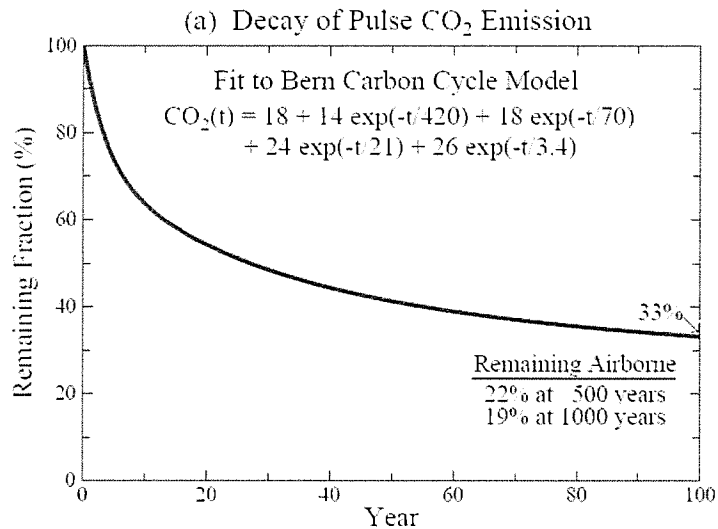
"If humanity wishes to preserve a planet similar to that on which civilization developed and to which life on Earth is adapted, paleoclimate evidence and ongoing climate change suggest that CO₂ will need to be reduced from its current 385 ppm to at most 350 ppm.

An initial 350 ppm CO₂ target may be achievable by phasing out coal use except where CO₂ is captured and adopting agricultural and forestry practices that sequester carbon. (emphasis added)



If the present overshoot of this target CO₂ is not brief, there is a possibility of seeding irreversible catastrophic effects." (Hansen et al. 2008)

Overshoot is driven by the long lifetime of CO₂ in the atmosphere, and its continuing accumulation even in a scenario of declining but non-zero global emissions. One third of a CO₂ emission pulse remains after a century, and one fifth remains well after a millennium as shown in the following chart (Hansen et al. 2007, see legend). This substantial portion of a pulse will persist in the atmosphere, "longer than Stonehenge. Longer than time capsules, longer than nuclear waste, far longer than the age of human civilization so far." (Archer 2009)



Left undisturbed, our old-growth and second-growth forests of southeast Alaska function as massive warehouses capable of capturing and storing incredible volumes of carbon. Using these same forests for heating and biofuel production is comparable to burning our warehouses down to stay warm. To do so in the presence of the world-class renewable energy resources of Southeast, which produce virtually zero carbon emissions, calls into question whether addressing catastrophic climate change is really the objective of TFR proponents of biomass/biofuel.

TFR discussions have often been based upon a myth repeated by timber industry advocates that burning wood, whether from old-growth or second-growth, is "carbon neutral" and that by clear-cutting old-growth forests, fast-growing young stands of trees function better as carbon sinks removing more CO₂ from the atmosphere than old-growth forests. "That perspective was largely based on findings of a single study from the late 1960s which had become accepted theory, and scientists now say it needs to be changed" ("Old Growth Forests Are Valuable Carbon Sinks" ScienceDaily Sep.14, 2008).



"Contrary to 40 years of conventional wisdom, a new analysis published in the journal Nature suggests that old growth forests are usually "carbon sinks" - they continue to absorb carbon dioxide from the atmosphere and mitigate climate change for centuries."(ibid.)

"Old-growth forests accumulate carbon for centuries and contain large quantities of it. We expect, however, that much of this carbon, even soil carbon, will move back to the atmosphere if these forests are disturbed".
(Luyssaert, et al. 2008)

This reinforces findings of a similar study made several years earlier with applicability for Southeast's forests. *"Soil carbon is a major component of the terrestrial carbon cycle. **The soils of the world contain more carbon than the combined total amounts occurring in vegetation and the atmosphere.** Consequently, soils are a major reservoir of carbon and an important sink. Because of the relatively long period of time that carbon spends within the soil and is thereby withheld from the atmosphere, it is often referred to as being sequestered ."*(Swift 2001)

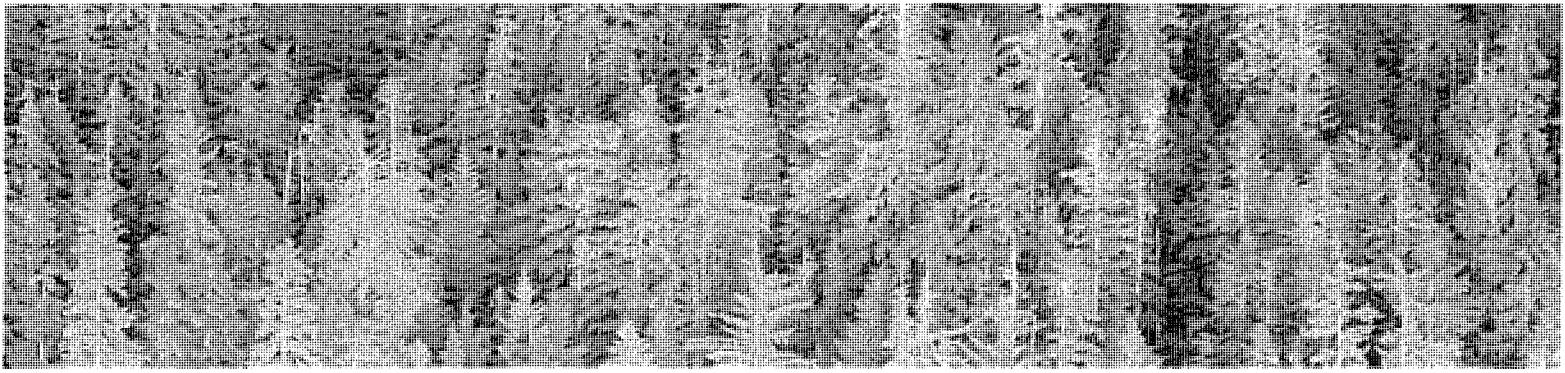
Additionally, it must be recognized that forests across the continent have a wide range of capacities for carbon sequestration. Because the many centuries-old temperate rainforest of Southeast Alaska lacks the catastrophic fire events typical of other forests, the Tongass contains among the highest amounts of sequestered carbon of all the world's forests. The Tongass National Forest, alone, represents 8% of the total carbon in all the forests of the conterminous United States (Leighty, Hamburg, Caouette 2006).

This raises the stakes on our already evident climate change impacts including ocean acidification. While the dominant method of timber harvest in Southeast has been even-aged management employing clear cut methods, and while TFR members advocate its continued practice, there is little doubt such practices spell trouble for the region and the planet.

"Timber harvest, clear cutting in particular, removes more carbon from the forest than any other disturbance (including fire). The result is that harvesting forests generally reduces carbon stores and results in a net release of carbon to the atmosphere." Harmon (2007). "The majority of forest carbon released comes from what is left behind in the forest to decompose naturally, burned on site, or transported as waste from a mill where it is burned for fuel. Each of these outcomes of logging results in the release of carbon into the atmosphere".

In one study it was found that oldgrowth forests store up to four times more carbon than young or middle-aged forests (Law et al. 2003; Pregitzer and Euskirchen 2004; Fredeen et al. 2005; Smith et al. 2004).

Other studies show that logging can remove ninety-five percent of the non-soil carbon stored in a forest ecosystem with half of it being lost to the atmosphere in the first year (Janisch and Harmon 2002).



In yet another study tracking forest carbon after timber harvests which occurred between 1910 to 2000, Skog and Nicholson (2000) found that *71% of the carbon was released into the atmosphere*, 17% was stored in wood products and 12% ended up in landfills.

It is true stands of young growth in the aftermath of clearcutting have a high rate of carbon uptake, (Mackey et al. 2008). However, it has also been shown the carbon uptake accrued over a given harvest rotation would not make up for the amount of carbon stored in the originally logged old-growth. In that same study (Janisch and Harmon 2002), it was found that managed stands on 80 year rotations stored only *half* the carbon of old growth forests. The point of this being, once those “warehouses” storing carbon are destroyed, it takes centuries to rebuild the lost carbon capture and storage capacities at a time when our planet desperately needs these services.

Overburdened

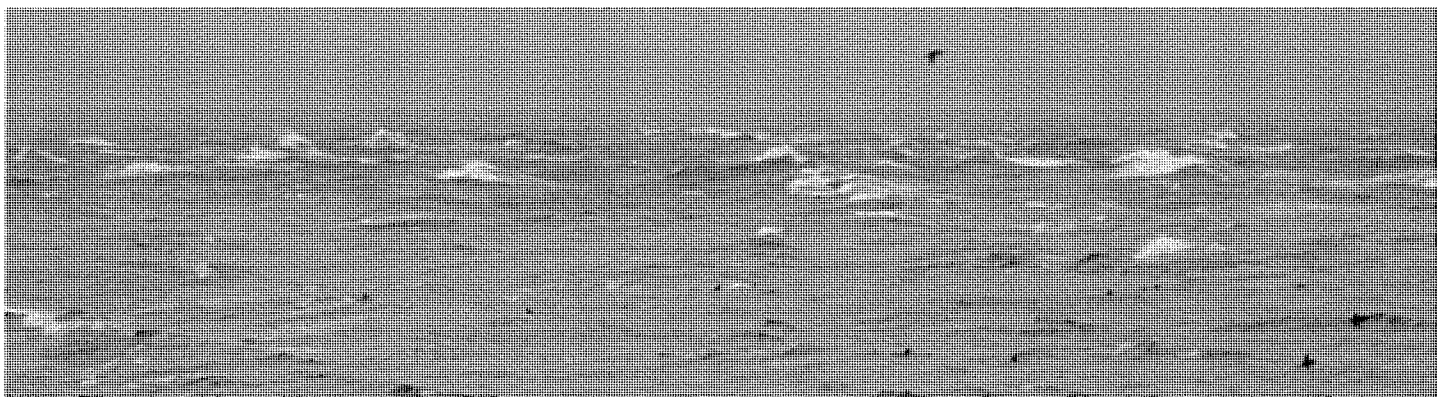
It has been twenty years since Dr. James Hansen first warned our leaders of the climate change effects we are currently realizing. NASA scientists recently reported over 2 trillion tons of Greenland and polar ice have melted since 2003 alone. We have overburdened our skies with carbon dioxide which has overburdened our oceans with carbon dioxide, which is inexorably, acidifying that which covers 75% of our planet.

In consideration of the unequivocal urgency with which our top climate scientists frame our current predicament, TFR members would do well to realize the "futures" to which they are confining our region and our planet. Of all the renewable energy projects available in Southeast Alaska, woody biomass as a waste stream of further clearcutting clearly poses the greatest risks of accelerating climate change, further degrading fish and wildlife habitat, and further perpetuating the fiscal folly of propping up an industry which has not been able to exist without massive taxpayer subsidies. To date, over a billion dollars of taxpayer funds have been invested in a timber industry in Southeast Alaska that presently represents only .02% of the regional economy.

If anything, TFR discussions, process and methods to date expose the makeup of TFR membership as dominantly composed of stakeholders eager for fresh subsidies for a timber industry in Southeast. The emerging policy products of TFR such as a rush to endorse biomass energy systems without considering a full understanding of the science, reveals stakeholder circumspection to be in short supply. Such circumspection must necessarily include the recommendations of the Intergovernmental Panel on Climate Change (IPCC) which promotes conservation of existing carbon reserves as the most effective mitigation strategy for the land use and forestry sector:

“Reduced deforestation and degradation is the forest mitigation option with the largest and most immediate carbon stock impact in the short term per (hectare) and per year globally....”

(from: *Climate Change 2007: Mitigation of Climate Change. Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change* (pp. 541-584).



Epilogue

The massive national subsidy stream being directed towards the utilization of agricultural feedstock and woody biomass for the production of biofuels may work elsewhere but it is a huge mistake of great consequence to regard southeast Alaska as the place to implement such programs. Our rainforest stores the highest amounts of carbon reserves in all the worlds forests. Despite stated intentions to reduce carbon emissions, a biomass/biofuel industry in Southeast will simultaneously release massive amounts of this stored carbon and deplete the ability of the largest remaining temperate rainforest on the planet to absorb carbon dioxide from the atmosphere.

The history of previous subsidies on the Tongass demonstrates not all subsidies result in the wisest investments of taxpayer dollars, nor lead to the sort of economic or ecological outcomes originally promised by our leaders. Now that it has become clear the economy of Southeast can function effectively without relying upon large scale industrial extraction of what remains of our oldgrowth temperate rainforest, we have an opportunity to improve upon outdated “business as usual” mindsets. Now more than ever, our survival will be linked to abandoning the mindsets of the past which have unwittingly precipitated our present crisis.

This is especially the case with looming catastrophic climate change and the parallel catastrophe of ocean acidification, which is already wreaking havoc in the oceans of the world. The “Second International Symposium on the Ocean in a High-CO₂ World” was held in Monaco - Oct. 2008. A declaration, based on irrefutable scientific findings and signed by 155 scientists from 26 nations, set forth recommendations, calling for policy makers to address this immense problem. Two considerations of the declaration loom large:

- **Ocean acidification is underway, accelerating, and severe damages are imminent:** *namely from fossil-fuel combustion, deforestation, and cement production. As this CO₂ dissolves in seawater, it forms carbonic acid, increasing ocean acidity.*
- **Ocean acidification will have socioeconomic impacts:** *Ocean acidification could affect marine food webs and lead to substantial changes in commercial fish stocks, threatening protein supply and food security for millions of people as well as the multi-billion dollar fishing industry.*

The TFR process is clearly, structurally hobbled by limiting its voting membership on the basis of a “stakeholder” status, and operating on a predicable agenda based upon “collaboration” and “partnership” models used elsewhere. The TFR has a moral obligation to see that its policy products are fully vetted by objective scientific research employing a full accounting of carbon losses to the atmosphere.

Woody Biomass, Carbon, Climate Change and the Tongass Futures Roundtable

Dave Beebe 24 Feb. 09

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Woody Biomass, Carbon, Climate Change and the Tongass Futures Roundtable

Dave Beebe 24 Feb. 09

“When people who are honestly mistaken learn the truth, they will either cease being mistaken, or cease being honest.”—Anonymous

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Attn: USFS Round Table Participants

S. E. Alaska suffered a great loss to the economy when USFS were no longer able to make timber sales. It effected timber receipts for schools, business, shipping, and a man's livelihood. Timber sales would provide thousands of jobs for the workforce, boost our economy , add more taxes to our failing economy and our government. The USFS has had a cutback in their finances. They have had to look elsewhere to finance projects for maintenance on trails and cabins. We do not need another National Forrest Park to maintain. We can't afford it. Let us get revenue from what we have. Clear cutting is not a bad idea! It brings in more wild animals from surrounding islands because of better food and better berry picking and better access to these areas we could not reach before. If we ever had a forest fire, it makes a good fire break until it is overgrown again!

Loggers do work in harmony with the environment. There should be a law that no one can sue and take a person's right to make a living from them, especially when it's government monitored. Using common sense makes us realize the advantages of logging and utilizing our other natural resources to the benefit of our economy and workforce, instead of borrowing from other countries.

Sincerely,

Geneva Christensen
P. O. Box 1
Petersburg, Alaska 99833
(907) 772-3113

April 13, 2010

USDA Forest Service, Alaska Region
National Planning Rule ROUNDTABLE
Centennial Hall, Ballroom #1
Juneau, Alaska 99801

Gunal'cheech L'ingit Aani ka de' yei tu wu tu yei – Thank you for coming to Tlingit Country. Gunal'cheech for this opportunity to bring all thoughts forward for what the Forest Service planning rule should contain.

I speak here advocating for the recognition and inclusion of ANILCA Title VIII principles for guidance in the cumulative land use and planning process with an outcome that includes co-management MOU/MOAs between the federal government, tribal governments and ANCSA. This will allow for development of forest lands and resource management plans that properly include *all* stakeholder's issues, diverse interests, and traditional and local economies.

The Tlingit and Haida govern themselves within their own recognized territories to this day. Our families and clans managed land tenure, resource production and distribution, trade, war, peace-making, and sued the federal government for the unlawful taking of the Tongass homeland. The Tongass Forest in its ecological abundance provided for our complex foraging societies that evolved for the past 16,000 years by responding to the changing environment, landscape and laws of Nature. Indigenous existence depends on the balance and mercy of Nature as we blended ourselves wholly into the ecosystem we depend upon even to this day.

The clan system is the foundation of Tlingit identification that is told through symbolic property rights to stories, songs, names, crests, regalia and cultural icons that include our ancestors. Each grassroot local segment tended to the physical property use rights to salmon streams, halibut banks, hunting and trapping grounds, sealing rocks, berry patches, shellfish beds, and canoe landings. Our history is also the history of the Tongass that should be included in land development and resource management plans.

In the title wave-like wake of ANCSA, where our very right to exist within our own midst was extinguished under "aboriginal rights," many believed that our right to govern ourselves was also extinguished. The result of this misconception has caused a missing link in the true name of development and resource management planning in the Tongass Forest. All other users and stakeholders of the Tongass have their assured place and voice in the planning process already. Missing is the tribal governing bodies

and recognition of ANILCA Title VIII and the intent of congress after their extinguishing our hunting and fishing rights through ANCSA.

ANILCA Title VIII was to be the balance to ANCSA's extinguishment by protecting our cultural history, activities and access to the natural resources traditionally used. The USDA and FS have no idea how to administer or interpret ANILCA Title VIII, the law that has changed colors too many times to accommodate powerful interest groups that are threatened by a less than 1% usage of the Tongass' resources. It is now time to interpret ANILCA Title VIII for the benefit of the ones it was intended to protect and benefit: The original People of the Tongass.

Coming to full circle, the proper vehicle to guide and lead the federal and ANCSA interests are the federally recognized tribal governments in the Tongass Forest whose job it is to represent their members – and - who are also ANCSA shareholders. These tribal governments/members/shareholders have the capacity and responsibility to inject meaningful information and history into the planning process. Problems/issues for restoration and conservation, climate change, watershed health and water resources, the diversity of plant and animal species and habitat, and development of vibrant community economies depend on the effective contributions and acceptance of the Native voice officially at the planning and negotiating table.

The outcome of officially addressing Congress' intent under ANILCA Title VIII through co-management MOU/MOA between the federal government, ANCSA and tribal governments within the Tongass Forest will offer the most effective and proactive collaboration with the private, public and tribal interests. This all-lands approach and planning process will achieve the best decision-making process possible.

Thank you for your attention and consideration. Gunal'cheech!

Wanda J. Culp, Tlingit, Chookaneidi
Traditional Hunter, Fisher, Gatherer

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): LARRY EDWARDS
Email Address (Optional): LEDWARDS@GREENPENCE.ORG

Please share your input on the new Planning Rule process.

1. I URGE GOOD, OLD-FASHIONED "PUBLIC INVOLVEMENT," AS
OPPOSED TO THIS SO-CALLED COLLABORATIVE PROCESS,
WHICH IS TOO LIMITING & FRAMED. COLLABORATION SHOULD
SCIENTISTS & ANIMAL LANDOWNERS MAKE'S SENSE, BUT
THOSE ARE DIFFERENT.
2. KEEP THE RULE PROVISION FOR VIABLE POPULATION & WIDE
DISTRIBUTION OF WILDLIFE & PLANT SPECIES, BUT MAKE IT
STRONGER BY CHANGING THE NEED TO BE FOR "SUSTAINABLE
POPULATIONS" & THEIR WIDE DISTRIBUTION.
3. INCLUDE A RULE REQUIRING PLANS TO MAINTAIN &
WHERE POSSIBLE ENHANCE MOISTURE (E.G. HUMIDITY &
IN SOIL) ~~IN FORESTS~~ & COOLERS IN FORESTS, WITHIN HISTORIC
NATURAL VARIABILITY.
4. PLANS SHOULD PROMOTE THE NATURAL CAPACITY OF FORESTS
(BOTH OLD-GROWTH & YOUNG GROWTH) TO CAPTURE & STORE
CARBON. PLANS SHOULD INCLUDE RESEARCH INTO WAYS
BEST INCORPORATE CARBON INTO SOIL & RETAIN IT
(E.G. ~~FOREST~~ THINNING-WASTE)

over 2 →

5. REQUIRING PUBLIC COMMENTS TO BE SUBMITTED BY 9 PM TONIGHT (THE DAY OF THE EVENT) IS TOO CONFINING. THE PUBLIC HAS INVESTED TIME IN THIS, AND SHOULD BE AFFORDED AMPLE TIME FOR THOUGHTFUL REFLECTION & COMMENT.
6. THE APPEAL PROCESS SHOULD BE RETAINED,
~~AS IS.~~

April 13, 2010

Planning Rule Discussion

U.S. Forest Service – Alaska Region

Juneau, Alaska

Individual Participation/Input

From: Clay Frick

I applaud the U.S. Forest Service in their effort to diversify the management of the Tongass National Forest from predominantly logging to include more resources allocated toward recreation including the maintenance of and creating new trails and cabin structures in the forest. In recent years however, a number of existing cabins have been slated for or have been demolished. I believe this is a move in the wrong direction in promoting small scale recreation in the forest. The reason the Forest Service claims a need to take this action is the lack of money to maintain the structures. The Forest Service needs to be more innovative in how to fund cabin maintenance. Involve the public by encouraging volunteer work parties or start an "adopt a cabin" program. Some of the cabins in the Tongass are in Wilderness Areas that are accessed by float plane. Maintaining these structures is problematic in that a small generator to run power tools is prohibited. I think these rules need to be given some flexibility so that a volunteer work party could fly themselves into a cabin and be able to get work done in an expeditious fashion.

Thank you for taking my comment,

Clay Frick

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): Jim Gould - Mayor of Thorne Bay, AK.

Email Address (Optional): MAYOR@THORNEBAY - AK. GOV

Please share your input on the new Planning Rule process.

The "National Planning Rule" should
require that Forest Plans address and
incorporate affected communities,
surrounded by National Forest,
economic concerns.

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): Owen Graham

Email Address (Optional): ojgraham@aol.com

Please share your input on the new Planning Rule process.

- ① The planning rule should address full implementation of forest plans. Hard targets and incentives should be used to encourage full implementation
- ② The planning rule should insure that regional needs take precedent over national policies
- ③ The planning rule should not over-emphasize restoration because it is very costly, most of the Tongass is undeveloped (unlike ~~most~~ most other forests) and because the funds that could be spent on restoration could easily be spent on other more pressing issues – like supporting ~~a~~ local economies.
- ④ Planning rules should allow NEPA documents to be prepared quickly and with minimal cost.

04/14/10

Comments on Tongass Forest Planning Vote= Administer Timber Sales; more is better

janc@gci.net

To facilitator Jan Caulfield

To whom it may concern,

Qualification to comment:

My name is Paul Hamby, and my qualifications to comment on Tongass use include having worked in the logging camps of Southeast Alaska, prior to the injunctions which resulted in their being shut down. Prior to working in southeast AK, I also worked in forestry, planting trees, cruising old growth timber on both private sector, and publically owned forests. Eventually, I worked my way up, into timber harvesting, by the apprenticeship path of setting chockers, landing man, and finally to the highest and most honorable position, Pacific Northwest Timberfaller.

Alaska camps I worked out of include, Corner Bay, Cube Cove, Nakati, Thorne Bay, Lab Bay, and Mc Cleod Harbor on Montegue Island. Float camps I have worked off of, include, Appleton Cove, Hanus Bay, and a few others that the name has been forgotten. I cut timber all over southeast Alaska.

I cut timber for helicopter logging, shovel logging, butt rigged yarder, grapple swing yarder, and right of way for road construction. I have cut in transitional muskeg, yellow cedar stands, red cedar mix on POW, and varying qualities of old growth. I also cut in large and small blowdown patches. Each of these types of timber, and harvesting methods, requires specific cutting techniques in order to prevent loss of resource, and to make it safe for the rigging crew to remove the timber.

Comment:

Environmentalists have ruined the viability of the timber industry in Tongass. These lying cheats should not be rewarded in any fashion, for what they have done. Their continued PR bombardment of lies, only serves to unline their wishes to treat this national forest as a private park for their control and recreation, and specifically precluding any other uses.

Local hippie environmentalists are given free access to vandalize the left groves of timber, while not following the same rules that the professionals had to comply with. I have heard reports of unauthorized harvests, previously called timber theivery, in the areas of Tenakee Inlet. These violations go unchecked.

A Plan:

If the USFS intention is to truly correct the wrongs and to manage this valued resource, I offer this simple yet effective timber use plan.

Remove the greenies "imaginary preclusion to harvest areas". Using foresters, inventory the timber viable areas. This has been done already.

Due to the growth rates in Tongass, use a 100 year rotation as a basis for a management plan.

On a one hundred year cycle, 1% of authorized areas could be harvested annually, in a sustained yield mode.

Avoiding large monolithic cuts as much as possible, authorize for harvest, 1% of the viable timbered areas per year. When I say “authorize”, I would suggest that 1% per year become available to timber sales, but include the latitude of several or more years for actual harvest. This would better enable fiscal returns on this resource, be able to capitalize on international timber commodity price fluctuations.

Also, it would be a good idea to remove stipulations of harvesting of “pulp” or low quality junk wood, particularly after the greensies have killed the pulp mills which could have used this stuff. If anything, let the greensies have it to convert to wood pellets, using excess hydro power during off hours to do the processing.

Timber is an international commodity, and can only compete viable, if political stipulations of “value added in state” are removed. In the same way that you do not require the restaurant chef to be the one that catches the salmon he serves, likewise, forcing timber milling to be done locally does nothing to create sustainable markets.

Precommercial thinning should be insisted upon. This is tree thinning at the 10-15 year point, following harvest, and just prior to the “grand growth period”. This stage not only employs, but makes the regrowth healthy and viable, as well as significant browse increases in this wildlife habitat.

Summary:

1%/100 year rotation.

Greenies can make woodpellets from thinning and pulp wood.

Timber use does not preclude recreation uses.

Economic diversity; sell timber on Pacific rim market instead of borrowing money from China

Provides employment, sustainably. Even for the greensies.

Professional loggers and foresters return.

Enhanced wildlife habitat, as long as the environmentalists aren't allowed to squander the monies on nonproductive and political “studies”. If the monies get earmarked for precommercial thinning, then it should remain unmolested by the greensies.

Post Mortum:

Some view these “public comment invitations” as only an exercise of futility, done only as a nessary evil, on the way to tying up more timber on behalf of the environmentalists. Please stop the madness. Let us use wood, and stop penalizing those who go fetch it for us.

Thanks for letting me comment.

-Paul Hamby
Woodsman

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): Rosemary Hegerig / Public
Email Address (Optional): Rosemary.Hegerig@cesjuneau.org *First Things First*

Please share your input on the new Planning Rule process.

Since this meeting is really a planning session to develop a
plan development methodology, I am having a bit of
difficulty with the abstract nature of this meeting -
But I am impressed with the concept that the
USFS is trying to involve the public so very early
on in the process.

Concern with the issue of "one size does not fit all" -
that issues on the Tongass will be very different
than those encountered east of the Mississippi!
I am primarily interested in development
rules that actually do facilitate actual
MULTIPLE USE of the forests - particularly the
issues related to STRONG, VIBRANT ECONOMIES.
In addition to the needs of the USFS to use prudent
methods to sustain the incredible resource
that we all value - we must also place a very
high value on the need of the people who
live in our Region to make a life and a LIVING
over

in this part of the world, Rule ~~making~~ development and subsequent rule making and implementation cannot preclude the ability of local governments, tribal organizations and real people who live, work and raise families here to be able to sustain themselves.



KETCHIKAN GATEWAY BOROUGH

1900 FIRST AVENUE, STE 126 • KETCHIKAN, ALASKA 99901

• 907/228-6610 • fax 907/228-6698

ECONOMIC DEVELOPMENT DEPARTMENT

Please see the attached copy of a letter I wrote to Mr. Jay Jensen last December. A major point in this letter I cannot emphasize enough is that the policy development process the Forest Service has chosen will, with certainty, lead to the dismantling of the remaining shreds of the forest products industry in Southeast Alaska.

Mr. Jensen replied most graciously and with an encouragingly positive tone to my letter. However, he did not address the issue that, by the time the Forest Service acts, the existing forest products industry in the Ketchikan Gateway Borough will have been liquidated. This means the Forest Service will have to bring in outside contractors for all the restoration projects it plans. These outside companies will use our resources, but export the income from the projects to economies outside our region. This is disastrous economic policy and at absolute opposite purposes to the stated goals of President Obama's administration to help suffering economies with jobs. These will not be our jobs.

We once had 500 jobs in one mill in Ketchikan. These are all gone now. Some of them could come back if the forest restoration project proposed to the Forest Service by a Ketchikan entity were to be implemented. This is a forest restoration project exactly in line with the Forest Service's stated goals. Why the Forest Service does not immediately move ahead with something so eminently suited to its own goals and the President's goals is unfathomable.

Also unfathomable is how there could possibly be a proposal to remove the roads from the forest and then claim that there will be second growth logging in the future. No roads = no logging. It does not make sense.

Deborah Hayden, CEcD, EDFP
Economic Development Manager
deborahh@kgbak.us
907 228-6610

Mr. Jay Jensen
December 24, 2009
Page 2

December 24, 2009

Mr. Jay Jensen
Deputy Undersecretary for Natural Resources and Environment
United States Department of Agriculture
Washington, DC 20250

Dear Mr. Jensen:

Your journey to Ketchikan in August together with Mr. Vasquez was a most welcome experience for the community. We greatly appreciated your personal visit and interest in community concerns. We were also most gratified when 2 local foresters held a follow up meeting and requested our submissions for funding the projects discussed during your August listening session.

Ketchikan Gateway Borough submitted 4 projects on October 24, and we trust you will duly examine them on their merits. For 1 of these I will ask your particular consideration and a response as soon as possible. This is the Forest Restoration project Ketchikan Gateway Borough and Seley Corporation are proposing in a public/private partnership.

Mr. Seley has met with you and presented the project. You explained in your meeting with us here that forest restoration is a high priority for the Forest Service. If that is so, this project meets the needs of the Forest Service for forest restoration, of President Obama's administration for job creation, and of the Ketchikan region for good stable jobs and an indigenous forest based industry.

At this point, Mr. Seley's mill has been closed since December 2008 for lack of timber supply. The recent judicial ruling against the Orion timber sale ensures there will be no timber supply for re-opening the mill.

The forest restoration project will enable Mr. Seley to resurrect operations and retain the facility as a forest-oriented operation providing many good jobs. After making the forest restoration proposal over a number of months, including visits to Washington, DC, and with the negative Orion sale decision, Mr. Seley is now in a position of needing to move forward with a forest oriented project or to permanently close the operation and liquidate it. The carrying costs of keeping the mill in a ready, but non-producing, state are too great a burden. A December 19 Ketchikan Daily News article quoted Mr. Seley, "If there's no decision, our

option is to sell our assets," Seley said. "We have to at some point. We can't hold on to land and equipment and keep people employed and maintain the mill without the ability to produce cash."

Liquidation of the mill will mean the local workforce will migrate elsewhere. This will greatly exacerbate the 8% population decline Ketchikan has experienced since 2000. Ketchikan is in a downward spiral losing population and having few good job opportunities to bring more people here.

If Mr. Seley must liquidate the mill, and the Forest Service decides at a later date to go ahead with a forest restoration project, there will be no local company in existence with a mill that can perform the work. The Forest Service will have to contract the project to an outside company. The net income from the contract will not create a stable presence and reinvestment in the local economy, but flow out of the region. Mr. Seley proposes to continue on with development of an entire industry centered on wood chip fuel conversion with a plan for distributing and installing high efficiency wood chip boilers throughout the region. It is difficult to imagine a contractor from outside the region committing the time and effort to develop an auxiliary industry alongside the thinning operation.

For all these reasons, we respectfully request that you expedite the decision making process for this project and give us a response as soon as possible.

Sincere regards,

Deborah Hayden, CEcD, EDFP
Economic Development Manager

Best messenger, Inc.

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): Kevin Hood / American citizen

Email Address (Optional): kevin.e.hood@gmail.com

Please share your input on the new Planning Rule process.

There are two Fundamentals that are essential to a successful planning rule:

1) Ensure that the planning rule is Fully responsive to the ~~intent~~ intent and standards of the National Environmental Policy Act

2) Ensure that the planning rule secures biological viability for native species and ecological viability for natural dynamics and relationships.

It is likely your considerations will examine many topics. Please be sure to include these two fundamentals.

Thanks For your consideration!

Kevin Hood

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): Ray Howard

Email Address (Optional): jsc99801@yahoo.com

Please share your input on the new Planning Rule process.

Prioritize (encourage) Forest uses
Such as alternative energy through the
Plan. Alaska has many unique resources
Such as geothermal, wind, water & wave
power resources that could be put to use.
Their development would support local
economies w/o (or little) adverse ecological
effects. With encouragement & perhaps more
efficient permitting, we could lower
energy costs, decrease carbon footprint &
energize local economies.

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): Jim King - Tongass resident

Email Address (Optional): _____

Please share your input on the new Planning Rule process.

- 1) Where a forest is badly changed restoration is not possible, rebuilding is needed.
- 3) Clear cutting has damaged watersheds world wide & should never be allowed on any public forest.
- 4) Wildlife diversity depends on a natural forest and is irreversibly damaged by clear cutting
- 5) A vibrant economy depends on providing for everyone as described in the Multiple Use Act

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): Steve Lewis / City of Tenakee Springs
Email Address (Optional): tenakeetwo@alaska.com

Please share your input on the new Planning Rule process.

In the Tongass, its important to not only take an "all lands" approach, but also to include all the waters surrounding our archipelago. These are critical to developing appropriate transportation systems & assessing the impacts of changing uses of either land or water on the other. The two are critically tied together on the Tongass (& Chugach).

Fisheries are an important element of our economy & ecosystem. The tie between water & land is obvious. Management needs to be collaborative if different agencies are responsible for caring for different parts of shared habitats / economies. Floyd Kohler comment on state/federal management of fisheries was very pertinent.

Please include All small communities in planning process by visiting - Native & non-native alike. Its a long expensive way to the "big" cities & this really affects our towns.

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): Glen Martin / Alaska Power & Telephone Co.
Email Address (Optional): glen.m@aptalaska.com

Please share your input on the new Planning Rule process.

The Planning Rule needs to address implementation of
the National Energy Policy, which is not mentioned in any
Planning Rule or Regional Management Plan. The potential
for renewable energy projects on FS lands is significant
economically and to offset greenhouse gas emissions.
Speaking for Alaska, many communities are still reliant on
diesel power generation that affects them economically, socially,
and pollutes the environment.

Renewable energy projects should be supported by
the Planning Rule. Offsetting greenhouse gas emissions
anywhere that can be reached by a renewable energy grid,
ie. from Alaska to the Lower 48, will help reduce G.H.G.

To meet the National Energy Policy guidelines we
need the Planning Rule to support multiple uses and
in particular renewable energy policy.

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): BOB MANNARD; SEALASKA CONSULTANT

Email Address (Optional): _____

Please share your input on the new Planning Rule process.

As recognized during the Roundtable session
with the Planning Rule rulemaking process
and the forest planning process
set out in an updated Planning Rule
rule to incorporate:

- 1) meaningful consultation and collaboration with
Alaska Native Corporations and Tribe governments
- 2) collaboration with adjacent land owners
and managers, including Alaska
Native Corporations.

This one important point of emphasis among
many addressed during the session.

Thank you - Bob M.

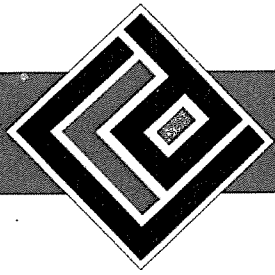
Jan,

I wanted to comment on the pending planning rule changes. As an Outfitter/Guide I would like to see the future planning rule provide for increased access to USFS lands for the purpose of guiding. I think that some level of priority should be given to these activities as they facilitate access for the general public to areas that they may otherwise not have the opportunity to visit. Additionally, Outfitter/Guide activities provide a high economic return to the communities they operate in with a relatively low impact to the environment. This is a high return use of the resource that needs to be allowed for going forward.

Thanks for the opportunity to comment. Feel free to contact me if you have any questions.

Sincerely,

Chris Meier
Vice President
Alaska Travel Adventures
(907)789-0052 phone
(907)789-1749 fax



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

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April 13, 2010

Written Comments on Forest Service National Planning Rule submitted at Alaska Region Roundtable, Juneau, Alaska

The Resource Development Council (RDC) appreciates the opportunity to comment on the U.S. Forest Service Planning Rule.

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism, and fisheries industries. RDC's membership includes Alaska Native corporations, local governments, organized labor and industry support firms. Our purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

While there is a great deal of emphasis being put on restoration, climate change and environmental issues in this new Planning Rule, it must not leave out of the equation true multiple use management, including timber harvesting. Multiple use is more than hiking, wilderness solitude, bird watching and other recreational opportunities. One can do all of these activities in a national park, but harvesting a renewable resource like trees in a park is forbidden.

The Rule should focus on the statutory direction of the Multiple Use Sustained Yield Act and the National Forest Management Act. The management goal for national forests and the overriding purpose of a forest plan is to provide multiple use and sustained yield of the products and services obtained from renewable forests in accordance with the Multiple Use Sustained Yield Act. "Restoration, resilience and collaboration" are not listed as multiple use objectives in the statutes. The planning rule should not be used to alter the statutory purposes of the National Forest System.

RDC supports a realistic planning process that is both responsive to environmental and economic considerations. We also believe the new planning rule should leave substantial flexibility to work out locally-tailored solutions. We strongly recommend avoiding a one-size-fits-all approach. For example, Alaska's forests are comparatively healthy and wildlife and water quality are in good shape. The biggest challenge in the Tongass is meeting the goal of sustainable use of public lands to support local communities.

The national forest lands in Southeast Alaska are central to the existence and health of the region's communities, and any planning rule must be flexible enough to allow step-down plans to recognize and be supportive of local community needs that only the national forest can provide. The Tongass surrounds many local communities, which highlights the importance of the planning rule to enable regional forest planning to provide outcomes that support, create, re-create local vibrant communities. The Tongass is positioned to be the economic engine for these communities and it is vital for the forest to once again be able to provide sustainable year-round jobs.

Balance

As the Forest Service proceeds through the process of developing a new planning rule, RDC encourages the agency to achieve a fair balance among the various uses occurring within forest system units. For example, by overemphasizing restoration, water quality, climate change and wildlife conservation at the expense of timber production and mining, the resulting imbalance will harm local communities and the regional economy. Balance is an important criteria to strive for when designing new planning regulations.

In our opinion, there is a serious imbalance in the Tongass. Of the entire forest, only 4 percent is available for timber harvest. Approximately 78 percent is zoned non-development, with 35 percent in Wilderness. Of the old-growth forest, 6 percent is available for harvest over the next 100 years. While the forest plan leaves 2.4 million acres in the backcountry open to logging, only 663,000 acres would be scheduled for harvesting over the next 100 years, and half of that acreage is second-growth cut decades ago. Meanwhile, the annual harvest ceiling has been reduced to 267 million board feet, down from 520 million board feet set under the Alaska National Interest Lands Conservation Act (ANILCA). Under 50 million board feet of timber has been harvested annually in recent years.

ANILCA

Consistent with numerous national laws and regulations affecting Alaska since 1980, RDC strongly recommends a general clause in the planning rule clarifying that in case of conflict between the national rule and ANILCA, the provisions of ANILCA prevail. Since administrative regulations cannot supersede Congressional direction, such a provision amounts to an important reminder for both managers and the public.

Wilderness and Roadless Reviews

There is no need to conduct additional Wilderness or roadless area reviews on national forest lands in Alaska. Between ANILCA and the subsequent Tongass Timber Reform Act of 1990, these issues should be considered settled. National forest lands in Alaska already host 19 designated Wilderness areas and numerous additional areas managed to preserve primitive roadless attributes. If the study of roadless or wilderness areas is provided for in the National Planning Rule, RDC strongly urges a specific Alaska exemption from any such provision. If the roadless rule is applied to the Tongass, the present Forest Plan's annual cut drops dramatically from 267 mmbf to about 50 mmbf.

Meeting Needs

We urge that the Planning Rule place more emphasis on insuring forest plans are fully implementable. The Forest Service has been unable to implement even 20% of its planned timber sale program in the Tongass. The Planning Rule should recognize and allow for a timber sale program that is adequate to

meet the needs of the timber industry in each region. A recognition of economics of scale needed to sustain the industry and the availability of alternative sources of timber should be considered. The identification of suitable timberlands should include an economic analysis that insures the lands selected will support an economically viable timber sale program. The Planning Rule should also recognize and allow for the needs of the mining and tourism industries and others that utilize the resources in the national forest to support local economies, jobs and create wealth for our nation.

Standards and guidelines should be adopted with a recognition of the impact those standards and guidelines might have on all of the multiple uses in the forest, including maintaining a viable timber sale program. Multiple use management requires a balancing of conflicting uses, not an elevation of one or more uses above another.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Carl Portman', written in black ink.

Carl Portman
Deputy Director

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

page one

NAME/AFFILIATION (Optional): Mark Rorick, chair Juneau Group of the Sierra Club

Email Address (Optional): mrroick@alaska.net

Please share your input on the new Planning Rule process.

Do to the implementation in 2009 of the 2008 Tongass land use management plan (TLUMP), the Tongass National Forest may not be managed under the new rule until the year of 2019. This is ^gextremely ^{serious} problem because the 2008 TLUMP does not adequately deal with the ongoing threats of climate change, even though the Tongass National Forest is one of the top 10 carbon sequestration, per acre, in our nation's forest system. It is existential that this forest's old growth tree stands, and particularly its forested roadless areas, be protected and thereby become a part of the Forest Service objective to mitigate climate change. To do this the Tongass needs to be managed under the new planning rules.

Under the 2008 TLUMP the Forest Service notes that climate change is a major threat, but says that because of the

next page

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

page Two

Individual Participation/Input

NAME/AFFILIATION (Optional): Mark Borick, chair Bureau Group of the Sierra Club

Email Address (Optional): mpborick@alaska.net

Please share your input on the new Planning Rule process.

un-certainty of the effects of climate change, it will only deal with it in the future. This is re-active management and you can look at it as preparing for an earthquake after it happens. We may not know the exact time of the earthquake, or exactly how many cities it will destroy, but we know it will happen. Pro-active management of the forest to deal with climate change with the goals of maintaining and restoring resilient habitats, maintaining the forest's bio-diversity, and the fishing and wildlife dependent economies of our nation's rainforest is existential. To do this the Tongass needs to be put under the new rules as soon as it is implemented.

Attached is a more specific ~~document~~ document about the management of the Tongass national forest to be incorporated into the record.



SIERRA
CLUB
FOUNDED 1892



March 13th, 2010

Tom Tidwell, Chief
United States Forest Service
201 14th St. SW
Mailstop: 1144
Washington, D.C. 20250

re: A Vision Statement for the Tongass National Forest

Dear Chief Tidwell:

On behalf of the Juneau Group of the Sierra Club, I submit this statement in response to a request for interested parties to put forward their vision on how the Tongass National Forest should be managed. The Sierra Club has been actively involved in forest management issues both nationwide and specifically on the Tongass for many decades. It is the purpose of this letter to express our appreciation and support for the Forest Service being actively engaged in transitioning the Tongass National Forest away from decades of old growth logging to restoration and other sustainable management practices.

The Tongass National Forest is America's Rainforest. At nearly 17 million acres the Tongass is the largest reserve of coastal temperate rainforest in the world. Stretching for more than 500 miles along the southeast coast of Alaska, the Tongass covers an island landscape fragmented by narrow inlets and glacier-carved fjords. The Tongass National Forest, especially its roadless and other wild areas, provide significant fish and wildlife habitat, clean drinking water, flood control, and public recreation opportunities. However, these essential services shouldn't obscure the critical role that wild forests play in combating global climate change. As the largest and wildest of all national forests, the Tongass has an especially important role to play in the face of the threats of climate change. Maintaining The Tongass ecosystem has become more important as our nation and planet faces the ongoing threats of climate change. In regards to the Tongass, we can quote Secretary Thomas J. Vilsack: *"protecting the world's climate is one of the greatest challenges of our lifetime. Forests have a vital role to play in overcoming this challenge. Rainforests store vast amounts of carbon. That's true across the planet, and in America, too. Our Tongass National Forest, a temperate Alaskan rainforest comprises only 2% of America's forest land base, but may hold as much as 8% of all*

the carbon contained in the forests of the United States". Creating a new management regime that deals with climate change is a large part of our vision.

Not only should a new management regime focus on carbon sequestration, it is vital that forest management focuses on maintaining resilient habitats. The Tongass's diversity of habitats provides a large range of economic opportunities that the Southeast Alaska economy is dependent on, such as fishing, recreation, tourism, and subsistence. But sixty years of intensive old growth clearcutting in prime wildlife habitat watersheds has resulted in irreversible harm to the structure of the rainforest's ecosystem. A new forest management regime on the Tongass National Forest that focuses on the restoration and the maintaining of a healthy ecosystem is long overdue. More than 50% of the big tree old growth stands were logged during the pulp mill era, and these stands were in the highest habitat valued watersheds of SE AK. Of equal concern is that the decades of logging was focused on the most accessible and high timber volume areas of the forest, and the result of that is a timber sale program that is heavily subsidized and economically unsustainable. A new forest restoration management regime should be designed to produce jobs in the most possible and practicable way to replace the lost jobs of the declining timber industry, but not in such a way that harms the ecosystem. Managing for a healthy ecosystem can begin by reducing the impacts of current practices on affected ecosystems and by repairing the past harms. These past harms include blocked culverts, impaired streams and estuary systems, and out of use logging roads. Repairing or removing these past harms and stresses on the ecosystem can provide near and long term economic benefits.

Because transitioning the Forest Service to a new management regime will take considerable time, either through the new forest planning rules currently being developed, or by regulation changes, we have identified our top priorities that can be done by near term actions.

- 1) First and foremost is to take actions to permanently protect Tongass roadless areas and other high value watersheds. Removing the 2003 temporary Tongass roadless rule exemption will provide a near term safeguard for the roadless areas, which along with the other high value watersheds are important for their high value fish and wildlife habitats. These actions also are also a pro-active protection measure to mitigate climate change.
- 2) Take actions to restore watersheds impaired by previous logging by using the best science and thinning prescriptions available to do restoration work that meets the goals of: maintaining and creating resilient habitats, protecting fisheries and clean water, accelerating the growth of already logged stands to old growth stand characteristics, and to protect all old growth dependent wildlife.
- 3) Take actions to delete the funding of logging roads and deficit timber sales from the FS budget and redirect it to wildlife enhancement projects, stream repair projects including removing blocked culverts, decommissioning out of use logging roads, and other restoration projects. Repairing or removing these past harms and stresses on the eco system can provide near and long term economic benefits.
- 4) Take actions to stop the use of export policies that allow unprocessed timber to be exported to lower 48 states and Asia to make deficit timber sales appraise positive. Currently 50% of a sale is allowed to be exported unprocessed by the sale holder's mills, thus providing little economic benefit compared to the ecosystem damage done by sales that would otherwise be

appraised negative. Taking this action releases the money spent to create these sales and that money can then be spent in a more beneficial way.

5) Take actions to increase the percentage of the Tongass Forest's budget that manages tourism, recreation, hunting, fishing, and subsistence uses. These activities are the driving force of the Southeast Alaska economy. But now, as in the past, a hugely disproportionate amount of money is directed at promoting the timber industry instead of being focused on the real future economy of Southeast Alaska. It is of vital importance that tourism, hunting, fishing, and recreation uses be managed efficiently, strongly, and in such a manner that the grandeur of the forest is protected.

The Juneau Group of the Sierra Club looks forward to working with you to meet the expressed goals of the President, the Forest Service, and other administrative members to protect the grandeur and habitats of America's rainforest during this challenging time.

And we sincerely thank you for asking for our input,

Mark Rorick, Chair, Juneau Group of the Sierra Club
1055 Mendenhall Peninsula Rd. Juneau Alaska 99801
907-789-5472 mprorick@alaska.net

cc: Secretary Thomas J. Vilsack
Under Secretary Harris Sherman
Deputy Under Secretary Jay Jenson

The rule should clearly state that the Plans must strive for balance. Balance between the environmental impacts with the social and economic impacts to those that live here. There should be some sort of verification process to show expectations what the plan's actions do to the local economies (during NEPA - prior to implementation), but allow modifications and adjustments should other impacts (underestimated or unanticipated) affect economies.

Forest Planning should prioritize heavily local community plans and regional plans. Transportation, energy, access to water sources for community sustainability are critical components, and usually a road of some kind is necessary to access facilities. But there needs to be some sort of allowance for communities to site facilities on USFS land, since we are all so landlocked for future growth.

Coordination with local communities and boroughs should be mandatory beyond the normal scoping process. Wrangell has invoked with the USFS the official coordination authority acknowledged by federal law with the USFS, but we should not have to struggle to make the coordination process work -- it should be the normal course of doing business in the Tongass. Pre - project planning, information dissemination directly with governments --local and tribal -- should be routinely made. detailed information, part of the planning team.. not just the project lists for the quarter and normal NEPA scoping documents.

While restoration can be an important element, it should not replace timber as the primary use on the Tongass. The rules should address the cost of restoration, just like the cost of roads is analyzed. Roads have other intrinsic values besides just a road to a logged area -- access, recreation, community use, commercial opportunity, firewood harvest, fishing. restoration areas are valuable to the environment from fisheries, access, drainage, recreation etc, but they can also limit potential uses. Plan for where to throw money at restoration and plan for areas for harvesting.

Future technology may allow additional mining activities. Future, growth, should be addressed in the planning rule to allow new developments.

Can the rules some how more clearly delineate what constitutes major changes in Forest Plans and what does not, such that minor changes do not need the five years of public process we seem to go thru?

Can the rules specify that during the public input process.. that the collection of form letters mass mailed in for coments will be counted separately, rather than have each one equal to individual letters and comments?

Carol Rushmore
Economic Development Director
City and Borough of Wrangell
P.O. Box 531
Wrangell, AK 99929
907-874-2381
ecodev@wrangell.com

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): JOHN A. SANDOR

Email Address (Optional): JSANDOR@AK.NET

Please share your input on the new Planning Rule process.

I BELIEVE ALL USES PLANS ~~SHOULD~~ SHOULD
ADDRESS OPPORTUNITIES TO PRODUCE MORE
AFFORDABLE, RENEWABLE AND SUSTAINABLE
ENERGY FOR ALL NATIONAL FOREST DEPENDENT
COMMUNITIES.

^{POTENTIAL}
FOR ALASKA, THE POTENTIAL OF SE ALASKA'S
HYDROELECTRIC PROJECTS TO NOT ONLY
PROVIDE SE COMMUNITIES WITH MORE
AFFORDABLE ENERGY - BUT ALSO EXCESS ENERGY
FOR EXPORT THROUGH AN INTERTIE WITH
BRITISH COLUMBIA AND THE NORTH AMERICAN

GRIDS
ATTACHED IS THE SUMMARY OF "THE NORTHWEST
POWER LINE COALITION" DEVELOPED IN BRITISH
COLUMBIA, THE NATIONAL PLANNING RULE SHOULD
MANDATE USE OF PARTNERSHIPS WITH STATES,
COMMUNITIES, TRIBAL GOVERNMENTS AND ADJACENT
GOVERNMENTS - SUCH AS BRITISH COLUMBIA.

SUBMITTED FOR THE USES PLANNING
RULE MEETING APRIL 13 2010 AS
AN EXAMPLE FOR PARTNERING FOR
COOPERATING WITH STATES AND
PROVINCES

Electrifying Highway 37: The Story of the Northwest Power Line Coalition

It's a strange truth in British Columbia that almost a quarter of the Province, the northwest, an area bigger than France, does not have access to secure and reliable electricity. Most British Columbians, particularly those in our larger cities, would be shocked to know many communities still rely on diesel power and economic growth is denied an area with some of our highest unemployment rates. Its almost one of our dirty little secrets.

But the mining sector has been painfully aware of the secret. Exciting northwestern discoveries, some made in the 1950s or earlier, have remain dormant due primarily to lack of infrastructure.

In 2004, Donald McInnes, then President of Western Keltic Mines—proponents of the Kutcho project in the northwest of BC, a project now owed by Sherwood Copper—decided the status quo was no longer acceptable and began work on what would turn into the original Northwest Power Line Coalition.

"It made no sense. Here we had huge wealth and opportunity yet communities and industry were operating as if the 21st century was something that happened to everyone else!" says McInnes. "We decided it was time to convince government and other decisions makers that they were missing a real opportunity for want of what is a relatively inexpensive piece of infrastructure—a power line."

The project seemed a reality in the fall of 2007. Few in British Columbia's mining and exploration communities are unfamiliar with the rollercoaster of events surrounding the Galore Creek project in 2007. In May 2007 BC mining leader Teck (then Teck Cominco) announced it was teaming up with Galore Creek proponent Novagold to build the project. And in October of the same year, the Galore Creek team was joined by the Premier of British Columbia, Gordon Campbell, to announce that a public private partnership to build the Northwest Transmission Line had been reached. The Provincial Government was committing \$250 million and the private sector was contributing \$158 million to construction of the line from Meziadin to Bob Quinn.

Wendy Stuek of the Globe & Mail wrote "Industry groups that have spent several years lobbying the government to approve the project were jubilant Monday, saying the line would be an "economic catalyst" for northwestern BC." AME BC's then President Dan Jepsen said "Economic, reliable power is a huge factor for mine development, advanced mineral projects in the region could account for more than \$3.5-billion in investment and more than 2,000 jobs if the projects are built."

But it was not to be. On November 26, 2007, Teck and Novagold announced they were suspending Galore Creek construction and putting the project into "care and maintenance." The resulting impacts on construction of the power line were immediate. Then BC Minister of Energy and Mines, Richard Neufeld said "If there are some other consortiums that come forward with money and guarantees they will take the electricity, and all of those kind of things, then of course, we'll sit down and talk with them. But in the meantime, I think it's the prudent decision by government to say it's on hold."

Neufeld, now a Canadian Senator, went so far as to suspend any preliminary work on the power line, telling the Prince George Citizen newspaper that the project, including the environmental assessment

could not go ahead until there was a firm commitment on Galore Creek from NovaGold and Teck Cominco.

What had been jubilation in October turned to dismay. Northern communities, other mining companies, First Nations and a range of business saw the end to what was quickly becoming a symbol for economic development in the province's north. At this point it looked like electrification of the northwest would have to wait.

But at the Mineral Exploration Industry's Vancouver 'Roundup' conference in January 2008, Donald McInnes' Northwest Power Line Coalition was reborn.

"We put the word out to whomever would listen or cared," said then Mining Association of BC President Michael McPhie. "AME BC supplied the room and almost 100 people showed up. The politicians were not as happy as they felt they were being ganged up on, but the funny thing was we weren't even intending for the politicians to be in the room—that was supposed to be later."

Pierre Lebel, Chairman of Imperial Metals, took the bull by the horns. "We decided to give the whole thing one last great push. To so many of us it was a ridiculous game of chicken & egg—no power line without a mine or power project yet no power project or mine could proceed without the power line. At the very least we need to show the market the project remained alive and the only way to do that was to ensure the environmental assessment, engineering and First Nations consultation continued."

A key element of the new coalition was the support of the forty northern communities and regional districts. Through the Northern Development Initiative Trust an initial \$30,000 was contributed to begin the work required. Other contributions soon followed to pay for travel, conferences, meetings, media relations and report writing. The coalition grew quickly to a grass roots assembly of forty communities and forty-nine other groups and companies, including First Nations, mining and power companies, equipment suppliers, contracting and engineering companies, mining industry associations and First Nations joint venture companies.

For much of 2008 the coalition kept the issue alive. Barely a week went by in the first half of 2008 where there wasn't at least one media report, somewhere in BC, on the importance of the power line and the efforts to keep the project alive. "We knew that the decision-makers in Victoria were getting press clippings from around the province so even the briefest of mentions in the smallest media outlets helped. It was like a constant drip of water—every week a new radio clip or newspaper article," says Gavin C. Dirom, President & CEO of AME BC, who at the time was working for MABC. "We must have generated dozens of stories."

A highlight of that time was the Minerals North Conference held that year in Smithers. BC Premier Gordon Campbell was scheduled to address the conference and walked into a room with hundreds of people wearing black and yellow "Power 37" hats. Joining the crowd, the Premier commented he may be putting on the most expensive hat ever—referencing the construction costs of the line.

Yet even more critical to the lobbying effort was an economic justification for the power line. In 2008, the Mining Association of BC, operating on behalf of the coalition, commissioned an economic report

In September of 2008 the coalition released the "Report on the Electrification of the Highway 37 Corridor" to considerable media attention. The report, prepared with the assistance of Macquarie Bank—experts in financing infrastructure, pointed out that a power line from Terrace to Dease Lake power line "...has the potential to attract more than \$15 billion in investment, create 10,700 jobs and generate \$300 million in annual tax revenues to governments."

Shortly after the report's release, the provincial government moved forward. At the annual meeting of the Union of British Columbia Municipalities Premier Gordon Campbell committed \$10 million to ensuring the environmental assessment, engineering and First Nations consultation would continue while a new partner was sought. He also said that \$250 million in provincial money would be waiting if other partners stepped forward.

"Convincing the Province to keep the project alive and in environmental assessment was crucial. No partner was going to be found if the project was going to have to start again from square one. The announcement by the Premier broke the cycle of no power line without a partner and no partner without a power line," says coalition partner Ed Beswick of Hard Creek Nickel.

With this victory in hand, in early 2009 the coalition moved to a new phase of lobbying with a little more of a formal structure. Gitksan Hereditary Chief Elmer Derrick and Northern Development Initiative Trust CEO, the aptly named Janine North, agreed to co-chair the coalition.

"As northerners we know we had to work together to get the attention of decisions makers for a substantial northern infrastructure project. Remember we were working at a time when the Olympics infrastructure and large scale transit projects loomed large for governments," notes Chief Derrick.

Oddly enough, it was the global "great recession" of 2008 that created the opportunity to resurrect the project. Prior to the economic downturn of late 2008, no federal program seemed to fit with the type of project being proposed. But when Prime Minister Harper launched the Green Infrastructure Fund in May 2009, a number of options emerged. The first project for the fund was a hydro/transmission project in the Yukon so the precedent was set.

The Coalition's "Delivering Green Power to Northwest BC" study, which detailed the economic and carbon saving benefits of constructing the transmission backbone infrastructure from Terrace to Dease Lake, was plunked down on the desks of Minister of Transportation and Infrastructure, John Baird and his parliamentary secretary, MP Brian Jean, who dealt with BC's application for federal green infrastructure funds.

Credit at this point can be taken by Federal Minister Jay Hill who represents the northern constituency of Peace River-Prince George. Hill took an immediate interest in the northwest transmission project and the work of the coalition. He quickly lined up the support of the Federal Conservative BC Caucus and Minister of International Trade Stockwell Day. And in September, the stage was set.

"We may never know for sure, but as I understand it, Minister Hill personally walked the file over to the Prime Minister who immediately saw the opportunity," adds Janine North. "And the fact that the Prime Minister announced the project in Washington, DC following a meeting with American President Barack Obama really speaks to the potential importance of the project not just to northern BC, but to all of Canada, Alaska, and even North America."

The announcement by Prime Minister Harper on September 16, 2009 created a flurry of interest across BC. Over a dozen organizations put out media releases praising the project and over sixty media stories were generated within the space of five days—perhaps more media attention than any other infrastructure announcement in Canada. The coalition and its members were ecstatic.

"From no project to \$404 million in two years—not bad for a bunch of northerners and assorted hangers-on. By working together, by including everyone and by not getting bogged down in process or negativity, the people of northern BC will have a new power line—one that could mean billions in economic development and opportunity for one of the province's historically ignored regions. I think we can pat ourselves on the back...just a little," concluded Terrace Mayor Dave Pernarowski.

The federal 'Green Infrastructure Program' commitment of \$130 million to building the Northwest Transmission Line quickly moved a green hydroelectric project forward in the process toward construction jobs in northwest BC. The Forest Kerr Hydroelectric Project was designed and permitted in 2003 as a 112 MW (megawatt) generating facility with a 138kv (kilovolt) transmission line. As a result of the federal and provincial funding announcements for a 287 kv transmission line from Terrace to Bob Quinn, Alta Gas Renewable Energy Inc. undertook an optimization study. In October 2009, the company applied for an amendment to increase the energy generating capacity to 195MW, with very minor modifications to the footprint and no significant change in environmental impact.

If construction of the power line and the Red Chris Mine both begin in 2010, it is expected that both projects can be completed in time to plug into one another—perhaps within three construction seasons in 2013. With all the uncertainty of surrounding major projects in Canada this timeline is by no means assured. Yet power line coalition members would point out that just over two years ago there was no project at all.

Since the September 16th announcement by the Government of Canada of an agreement to financially support the construction of the Northwest Transmission Line (Highway 37), the project has been moving forward. The coalition understands that the project proponent, British Columbia Transmission Corporation, will be submitting its application to the British Columbia Environmental Assessment Office in January 2010. In a recent positive move, the Federal government has agreed to delegate the environmental assessment of the power line to the BC Environmental Assessment Office. This allows for a very accountable process with provincial environmental assessment timelines imposed, ensuring completion within 180 days (with some opportunities for short delays where necessary). The federal process, on the other hand, has no legislated timelines and has historically taken much longer.

We are hopeful this will mean some line clearing and/or preliminary construction during the 2010 construction season. It is understood that some major potential suppliers and customers for the power line would be ready to "plug in" to a completed line by 2012-2013.

Over the long term this infrastructure has the potential to serve ten new mines and seven independent power projects delivering clean, green energy into the BC Hydro grid, and generating up to 5,500 direct jobs and over 18,000 indirect jobs over the next several decades. Although a number of these projects are at an early stage and have a high degree of uncertainty about timing and scope of project development, one thing is certain, without this announcement and a transmission line to deliver and receive additional hydro power, they will not happen. Potential capital investments of \$15 billion over the next couple of decades could be enabled by this strategic piece of infrastructure

Furthermore the energy has moved from BC across the boundary to Wrangell where the Alaska Canada Energy Coalition is being formed to provide momentum to the dream of connecting southeast Alaska to the North American power grid.

A lot of the players have changed in BC and many of the coalition partners have been through a tough economic year. But the coalition was and continues to be a success—a testament to what happens when industry, communities, First Nations and others work together for mutual benefit. Most northerners would say there is no other way.

Janine North
Co-Chair
Northwest Powerline Coalition

Chief Elmer Derrick
Co-Chair
Northwest Powerline Coalition

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): JOHN A. SANDOR ALASKA - CANADA ENERGY COALITION
Email Address (Optional): JSANDOR@AK.NET

Please share your input on the new Planning Rule process.

IT IS ESSENTIAL THE USFS PLANNING RULE MANDATE PARTNERSHIPS WITH STATES AND LOCAL COMMUNITIES AND TRIBAL GOVERNMENTS - AND OUR INTERNATIONAL NEIGHBOR - BRITISH COLUMBIA.

THE PLANNING PROCESS SHOULD EVALUATE THE PAST HISTORIC USES AND PLANS OF THE NATIONAL FOREST - CONSIDERING HOW TO DEVELOP FUTURE PLANS WHICH CAN BETTER SERVE THE COMMUNITIES DEPENDANT ON THESE FORESTS.

DR WALTER SOLOVEFF'S ATTACHED ESSAY ON "THE PAST AND FUTURE OF THE TONGASS" SHOULD PROMPT THE USFS TO DEVELOP FUTURE PLANS WHICH WILL ALLOW COMMUNITIES TO PROSPER AND PROVIDE ALL FOREST DEPENDANT COMMUNITIES WITH ACCESS TO FOREST RESOURCES AND THE OPPORTUNITY TO DEVELOP MORE AFFORDABLE AND SUSTAINABLE HYDRO-ELECTRIC PROJECTS. LIMITED TO A SOUTHWEST ALASKA HYDRO-ELECTRIC INTERTIE SYSTEM LINKED TO BRITISH COLUMBIA AND THE NORTH AMERICAN GRID,

SUBMITTED FOR THE USFS
PLANNING RULE BY
JOHN SANDOR

APRIL 13,
2010

JUNEAU EMPIRE, TUESDAY, APRIL 8, 2008 A7

The past and future of the Tongass

By DR. WALTER SOBOLEFF

When I was born in Killisnoo, in 1908, the Tongass National Forest had just celebrated its first birthday. President Theodore Roosevelt set aside this land and water when Killisnoo was a bustling, productive community which produced much wealth. We processed everything from her- ring to whales and used everything from blueberries to Sitka Spruce. Nearby Angoon provided labor to Killisnoo, to canner- ies in Hood Bay, Hawk Inlet and the mines in Juneau. A coal mine was worked in Angoon as trees were cut to provide for buildings, heating and docks. We utilized our resources.

President Roosevelt, the great conservationist, proclaimed:

"And now, first and foremost you can never forget for a moment what is the object of our forest policy. That is not to pre- serve the forests because they are beautiful, though that is good in itself, not because they are refuges for the wild crea- tures of the wilderness, though that too is good in of itself; but the primary object of our forest policy, as the land policy of the United States, is making of prosperous homes. It is part of the traditional policy of home making in our country. Every other consideration comes as secondary. You yourselves have got to keep this practical object before your minds; to remem-

ber that a forest which con- tributes nothing to the wealth, progress or safety of the coun- try is of no interest to the gov- ernment and should be of little interest to the forester. Your at- tention must be directed to the preservation of the forests, not an end in itself, but as a means of preserving and increasing the prosperity of the nation."

My Turn

As we, the people and communities of the Tongass spent the next 50 years working together to share in this wealth with the

United States, we mostly got along. Some newcomers were not friendly and brought bad manners with them and worse. Nonetheless, we welcomed them as we worked our fish- eries, our timberlands and local mines while continuing our cus- tomary and traditional activities which have sustained us from the beginning. The economy prior to statehood offered the people of Southeast choices, something we no longer seem to have despite many advances in health care and many dollars spent on education.

With statehood, the Tongass and then I turned 50. The promise of a brighter future shone as we Alaskans would finally be "equal." The federal government invested in clean hydro-electric projects planned to power all our communities with affordable electricity. Alaskan Natives would be able to settle our claims for loss of aboriginal rights and for the first time stand side by side

with Alaskans who homestead- ed their lands. We understood from watching the treatment of our brothers and sisters in the Lower 48 that broken promises were the rule but we still be- lieved this need not be so.

So, the Tongass just cele- brated its 100th and Alaska is coming up on its 50th which is way too fast for my liking and I ask where we are today? Are we walking side by side with our fellow citizens, our fellow Alaskans? Do we have the op- portunities that existed prior to Statehood? Are we able to uti- lize our lands and waters as a means to create energy, jobs and wealth for our families?

Our villages today suffer in a way I have never seen. Angoon fights for its survival. As a member of the Alaska Native Brotherhood and a witness to the work of the Lord, I have found the energy to share open- ly, firmly and with resolve the need to address the condition of our people with those who have come to live with us. Sadly, our work is not nearly done.

The federal government con- trols the land in Southeast Alas- ka and we rely on their word and commitment in our deal- ings. The Tongass was intended to create the type of wealth and security known from time im- memorial by my people. Ang- oon has survived millennia and overcome many changes and is prepared to continue to con- tribute if allowed to do so.

• Dr. Walter Soboleff is a Tlingit spiritual leader and elder statesman who lives in Juneau.

PROCEEDINGS

OF
THE SOCIETY OF AMERICAN FORESTERS

The publications of the Society are sent gratuitously to all members. Copies of the Proceedings may be obtained of the Secretary for 25 cents each number.

VOL. I

MAY, 1905

No. 1

Forestry and Foresters

THEODORE ROOSEVELT

Delivered before the Society March 26, 1903

I have felt that the meeting this evening was of such a character as not merely to warrant but to require that I should break through my custom of not going out to make speeches of this sort for I believe that there is no body of men who have it in their power to-day to do a greater service to the country than those engaged in the scientific study of, and practical application of, approved methods of forestry for the preservation of the woods of the United States. I am glad to see here this evening not only the officials, including the head of the Department of Agriculture, but such men as Governor Richards, who are most concerned in carrying out the policy of the Department of the Interior, because the forest policy of any country must be an essential part of its land policy.

And now, first and foremost, you can never afford to forget for one moment what is the object of our forest policy. That object is not to preserve the forests because

they are beautiful, though that is good in itself, nor because they are refuges for the wild creatures of the wilderness, though that, too, is good in itself; but the primary object of our forest policy, as of the land policy of the United States, is the making of prosperous homes. It is part of the traditional policy of home making of our country. Every other consideration comes as secondary. The whole effort of the Government in dealing with the forests must be directed to this end, keeping in view the fact that it is not only necessary to start the homes as prosperous, but to keep them so. That is why the forests have got to be kept. You can start a prosperous home by destroying the forests, but you cannot keep it prosperous that way.

And you are going to be able to make that policy permanently the policy of the country only in so far as you are able to make the people at large, and above all, the people concretely interested in the results in the different localities, appreciative of what it means. Impress upon them the full recognition of the value of its policy, and make them earnest and zealous adherents of it. Keep in mind the fact that in a government such as ours it is out of the question to impose a policy like this from without. The policy, as a permanent policy can come only from the intelligent conviction of the people themselves that it is wise and useful; nay, indispensable. We shall decide, in the long run, whether or not we are to preserve or destroy the forests of the Rocky Mountains accordingly as we are or are not able to make the people of the mountain States hearty believers in the policy of forest preservation.

That is the only way in which this policy can be made a permanent success. You must convince the people of the truth—and it is the truth—that the success of home makers depends in the long run upon the wisdom with which the nation takes care of its forests. That seems a strong statement, but it is none too strong.

You yourselves have got to keep this practical object before your minds; to remember that a forest which contributes nothing to the wealth, progress, or safety of the country is of no interest to the Government, and should be of little interest to the forester. Your attention must be directed to the preservation of the forests, not as an end in itself, but as a means of preserving and increasing the prosperity of the nation. "Forestry is the preservation of forests by wise use," to quote a phrase I used in my first message to Congress. Keep before your minds that definition. Forestry does not mean abbreviating that use; it means making the forest useful not only to the settler, the rancher, the miner, the man who lives in the neighborhood, but indirectly, to the man who may live hundreds of miles off down the course of some great river which has had its rise among the forest-bearing mountains.

The forest problem is in many ways the most vital internal problem in the United States. The more closely this statement is examined the more evident its truth becomes. In the arid regions of the West agriculture depends first of all upon the available water supply. In such a region forest protection alone can maintain the stream flow necessary for irrigation, and can prevent the great and destructive floods so ruinous to communities farther down the same streams.

The relation between the forests and the whole mineral industry is an extremely intimate one; for, as every man who has had experience in the West knows, mines cannot be developed without timber—usually not without timber close at hand. In many regions throughout the arid country, ore is more abundant than wood, and this means that if the ore is of low grade, the transportation of timber from any distance being out of the question, the use of the mine is limited by the amount of timber available.

The very existence of lumbering, of course—and lum-

bering is the fourth great industry of the United States—depends upon the success of our work as a nation in putting practical forestry into effective operation.

As it is with mining and lumbering, so it is in only a less degree with transportation, manufactures, commerce in general. The relation of all these industries to forestry is of the most intimate and dependent kind.

It is a matter for congratulation that so many of these great industries are now waking up to this fact; the railroads especially, managed as they are by men who are compelled to look ahead, who are obliged by the very nature of their profession to possess a keen insight into the future, have awakened to a clearer realization of the vast importance of the economic use both of timber and of forests.

Even the grazing industry, as it is carried on in the great West, which might at first sight appear to have little relation to forestry, is nevertheless closely related to it, because great areas of winter range, available and good for winter grazing, would be absolutely useless without the summer range in the mountains where the forest reserves lie.

As all of you know, the forest resources of our country are already seriously depleted. They can be renewed and maintained only by the co-operation of the forester with the practical man of business in all his types, but above all, with the lumberman. And the most striking and encouraging fact in the forest situation is that lumbermen are realizing that practical lumbering and practical forestry are allies, not enemies, and that the future of each depends upon the other. The resolutions passed at the last meeting of the representatives of the lumber interests, which occurred here in Washington, were a striking proof of this fact and a most encouraging feature of the present situation. So long as we could not make the men concerned in the great lumber industry realize that the foresters were endeavoring to work in their interest, and not against them,

the headway that could be made was but small. We shall be able to work effectively and bring about important results of a permanent character largely in proportion as we are able to convince those men, the men at the head of that great business, of the practical wisdom of what the foresters of the United States are seeking to accomplish.

In the last analysis, the attitude of the lumberman toward your work will be the chief factor in the success or failure of that work. In other words, gentlemen, I cannot too often say to you, as, indeed, it cannot be too often said to any body of men of high ideals and good scientific training who are endeavoring to accomplish work of worth for the country, that you must keep your ideals high and yet seek to realize them in practical ways.

The United States is exhausting its forest supplies far more rapidly than they are being produced. The situation is grave, and there is only one remedy. That remedy is the introduction of practical forestry on a large scale, and of course that is impossible without trained men, men trained in the closet, and also by actual field work under practical conditions.

You have created a new profession of the highest importance, of the highest usefulness to the State, and you are in honor bound to yourselves and the people to make that profession stand as high as any other profession, however intimately connected with our highest and finest development as a nation. You are engaged in pioneer work in a calling whose opportunities for public service are very great. Treat that calling seriously; remember how much it means to the country as a whole.

The profession you have adopted is one which touches the Republic on almost every side—political, social, industrial, commercial; to rise to its level you will need a wide acquaintance with the general life of the nation, and a view point both broad and high.

Any profession which makes you deal with your fellow-men at large makes it necessary that if you are to succeed you should understand what those fellow-men are, and not merely what they are thought to be by people who live in the closet or the parlor. You have got to know who the men are with whom you are to work, how they feel, how far you can go, when you have to stop, when it is both safe and necessary to push on.

I believe that the foresters of the United States will create a more effective system of forestry than we have yet seen. If not, gentlemen, if you do not, I shall feel that you have fallen behind your brethren in other callings, and I do not believe that you will fall behind them. Nowhere else is the development of a country more closely bound up with the creation and execution of a judicious forest policy. This is, of course, especially true of the West, but it is true of the East also. Fortunately in the West we have been able, relatively to the growth of the country, to begin at an earlier day, so that we have been able to establish great forest reserves in the Rocky Mountains instead of having to wait and attempt to get Congress to pay large sums for their creation, as we are now endeavoring to do in the Southern Appalachians.

In the administration of the national forest reserves, in the introduction of conservative lumbering on the timber tract of the lumberman and the woodlot of the farmer, in the practical solution of forest problems which effect well nigh every industry and every activity of the nation, the members of this society have an unexampled field before them. You have a heavy responsibility—every man that does serious work, work worth doing, has on him a heavy responsibility—for upon the development of your work the development of forestry in the United States and the production of the industries which depend upon it will largely rest. You have made a good beginning, and

I congratulate you upon it. Not only is a sound national forest policy coming rapidly into being, but the lumbermen of the country are proving their interest in forestry by practicing it.

Twenty years ago a meeting such as this to-night would have been impossible, and the desires we here express would have been treated as having no possible relation to practical life. I think that since the present Secretary of Agriculture first came into Congress here there has been a complete revolution in the attitude of the public mind toward this question. We have reached a point where American foresters trained in American forest schools are attacking American forest problems with success. That is the way to meet the larger work you have before you. You must instill your own ideals into the mass of your fellow-men and at the same time show your ability to work with them in practical and business fashion. This is the condition precedent to your being of use to the body politic.

I was unable to attend the program today to get an understanding of the entire process/purpose of the meeting other than what I read in the Empire last week.

I would like to state that I feel the Tongass seems to be almost entirely protected from resource development and from the use of motorized vehicles. I feel it is large enough that it could and should be utilized for sound resource extraction of timber and minerals. We should allow corridors for future power line grids and utilities to connect isolated communities for lower energy costs.

The actions of the preservationists the past decade or two have managed to not only lock up the Tongass, but with the roadless rulings, now I understand that the Forest Service is removing bridges and culverts from existing logging/mining roads to eliminate ATV use claiming it is for safety and maintenance issues. The cost associated with the removal of said bridges and culverts probably is considerably higher than any needed repairs. I have to believe there are plenty of volunteers that would donate time and equipment to maintain these access roads if the Forest Service would allow it.

As a 50 year resident of Juneau (my wife is a third generation Juneauite) and father of two young adult sons living and working here, it seems that the US Government and the Forest Service have listened more to the back East environmentalists about how to eliminate human use of the Tongass forest than for those of us that actually live here year around that enjoy recreating in the Tongass. I do realize it is a NATIONAL forest for everyone in the USA, however, it sure seems like it has managed to become strictly a "look, but don't touch" asset of the Government.

In closing, I would urge you to give more weight to comments given by those of us in closer proximity to this region and to strongly consider allowing multiple user groups to enjoy this great land for all kinds of uses that can be done in an environmentally sound fashion.

Thank you,

Scott and Sandy Spickler
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Juneau, AK. 99801
907-789-3780 W

Comments
USFS
Alaska Region Roundtable – Tuesday, April 13

From: John Sund
Project Manager
OceansAlaska
P.O. Box 6093
Ketchikan, Alaska 99901

Public Policy
Building a Shellfish Industry

We have a great opportunity to create a strong, viable locally based industry in coastal communities in Alaska through the development of a shellfish industry. It will be driven by individual's investing capital and time on the farm. What is the public policy that will attract individuals to make this investment?

The Public

- The public gets economically and environmentally sustainable jobs and business in rural parts of coastal Alaska.
- Private individuals get the Opportunity to create a profitable business that accommodates an individual life style decision to live in rural parts of coastal Alaska.

The Farmer

Each individual oyster farmer will invest an estimated \$200,000 capital in the initial 3 – 5 years. It will take 2 – 3 years from the time of the first purchase of oyster seed to first cash flow from the sale of the first fully grown oyster. Financial feasibility is estimated to take annual sales of 500,000 oysters (41,600 dozen) at average farm gate value of \$.36 each (\$4.32/doz). This level of production will produce gross revenue of \$180,000 and a financially viable business with an acceptable return on equity.

Public Policy to encourage and assist building a shellfish industry

There is an opportunity to create a strong, healthy shellfish industry that will generate 200 – 400 new economically and environmentally sustainable year-round jobs and new economic growth in rural, coastal Alaska with an annual farm gate value of \$30 - \$50 million.

Over 70% of the expenditures of small, shellfish farms are spent within 20 – 30 miles of the farm site. These expenditures create opportunities for:

- Equipment purchase and fabrication; Educational services for youth to provide them with technical skills; Locally based transportation services; Opening up marketing opportunities for existing marketing resources; Local tourism that is attached to local ecotourism businesses; Locally based processing; Partnering with marketing and shipping business that feature high value fish products

Common Property Ownership

The one overriding factor is the common property ownership of the land, water and animals by the State of Alaska or the Federal government. In Alaska the private sector cannot begin to invest or create viable shellfish industry without permission of the government. This level of

common property ownership and control of the water and land creates a different type of hurdle and business risk.

There are many activities and policies that can be adopted by the government that reduce the risk or improving the chances for a private individual farm to succeed.

Actions for 2010 to Build a Shellfish Industry

Seed supply:

- ◊ APSA: (Seward Hatchery): Maintain operational integrity Hatchery.
- ◊ Geoduck Nursery: Southeast Alaska
 - ◊ Ketchikan Gateway Borough:
 - ◊ Kake geoduck proposal RBEG

Site Selection / Permit Cost

- ◊ Implement a program to assist farmers to enter the shellfish industry
- ◊ Institute a graduated lease fee program for shellfish farming
- ◊ Amend lease fee setting process to recognize farming as a new industry

Processing facility

- ◊ Naukati Regional Shellfish Processing Facility:

Financing – Operating / Capital

- ◊ Fund a project to put together a combination of private sector, NGO, foundations, federal and state entities to create a financing entity.

Training, Technical, Research support

- ◊ OceansAlaska (including related economic development project)
- ◊ Oyster Farming Coalition (MOU)
- ◊ Program to train workers and business owners

Compliance / Oversight

- ◊ Alaska Department of Environmental Conservation
- ◊ United State Forest Service
- ◊ Alaska Department of Natural Resources
- ◊ Alaska Department of Fish and Game
- ◊ Alaska Department of Commerce
- ◊ U.S. Corp of Engineers
- ◊ Local governmental units
- ◊ Many others as may occur

ACTIONS FOR USFS:

The Department of Agriculture (USFS) along with Economic Development Agency (EDA) can review all of programs and policies for ways and means to assist the creation of a shellfish – mariculture industry in Coastal Alaska.

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

I found Jim rather biased in what was highlighted and what was not, in favor of preservation, less growth and "climate change hysteria" just my opinion.

Individual Participation/Input

NAME/AFFILIATION (Optional): Robert Tonkin ALASKA MINERS ASSOCIATION

Email Address (Optional): _____

Please share your input on the new Planning Rule process.

Please pay VERY close attention to the integrity of the planning process. If we are to provide economic security to the region we must provide for long term employment opportunities for local residents.

The sources of capital that need to be married with the local labor force in the region need to feel secure that the rules won't change in the middle of the capital expenditure process. If this can be assured, to a reasonable extent, economic growth will result, enriching the area economically and culturally.

April 13, 2010
Planning Rule Discussions
U.S. Forest Service – Alaska Region
Juneau, Alaska

Individual Participation/Input

NAME/AFFILIATION (Optional): GEORGE WOODBURY

Email Address (Optional): Woodbury@artalaska.net

Please share your input on the new Planning Rule process.

The rule ~~shall~~ must require Forest Plans to set target for commodity production and ~~produce~~ designate where the commodity will come from by requiring the plan to include schedules show how much and where the commodity will come from. Exp. a ten year sale plan for timber must be part of the plan.

Restoration ^{Economy} ~~shall~~ is not a replacement for commodity production. There is no wealth creation in restoration projects it is all taxpayer funded.

What restoration is done should be econom pushed under a viable timber sale program.

From: Nick Lyons <nickyons@pobox.com>
Subject: **Plan rule comment from Eric Wyatt (via chat)...**
Date: April 13, 2010 4:06:07 PM GMT-08:00
To: Jan Caulfield <janc@gci.net>
Reply-To: nicklyons@pobox.com

Eric Wyatt: I just missed the "Economics" discussion. But, would like to add that as a rural resident involved in the shellfish mariculture industry - I'd like to see USFS encouraging "green" industry opportunities with the Tongass.

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Individual Participation/Input

NAME/AFFILIATION (Optional): _____

Email Address (Optional): _____

Please share your input on the new Planning Rule process.

This is a move in the right
direction: The problem is assimilating
the information — & then get it to
the public — so that it is understood
In other words progress of issues need
to be presented in ongoing manner — not —
solved & checked — to take in the
process to be corrected —