



October 27, 2010

Forrest Cole, Forest Supervisor  
USDA Forest Service  
Federal Building  
Ketchikan, AK 99901

Dear Forrest,

A review of the 2010 5-year schedule indicates that the Forest Service is planning to reduce our timber supply again.

The 2008 Tongass Land Management Plan promised to deliver up to 267 mmbf (million board feet) annually, but the 2008 5-year timber sale schedule along with the four promised ten-year timber sales provided only about 190 mmbf of timber sales annually. This latest 5-year schedule, now called a “vegetative management schedule”, cuts the scheduled volume about in half (it averages about 92 mmbf annually).

Meanwhile, the implementation of TLMP is proceeding about as expected; the Forest Service has been able to make available only about 10% of the scheduled timber sale volume. This is primarily a result of economic deficiencies in the Forest Plan. Also, please note that two-thirds of this latest schedule is comprised of timber sale projects that appraise deficit.

The primary cause of the reduced volume in the new schedule appears to be the avoidance of timber sales in roadless areas. Fully half of the timberlands scheduled for harvest in the 2008 TLMP are in roadless areas. Another quarter of the TLMP scheduled timberlands hold immature timber – timber that is growing very well, but will not be physically or economically mature for many decades.

In summary,

1. The new schedule utilizes only a quarter of the timberlands that were planned in the 2008 TLMP;
2. Two-thirds of the timber sales in the current schedule are deficit and as a result won't support any jobs;
3. The actual volume of timber that might ultimately become available from this plan may be too low to support even the single, medium-size sawmill that is currently in operation on the forest.

I also reviewed the "Forest Timber Sale Schedule for Young-Growth and Integrated Service Timber Contract Plan- FSM 2431.22". Over half of the acreage scheduled for commercial thinning has been planned for many years and we have studied the economic issues extensively. Based upon information provided by the Forest Service and industry operators, the cost of harvesting roughly 5,000 acres as scheduled in 2013 will be in excess of \$25 million and the value of the 37 mmbf of immature young-growth timber to the local sawmills will be less than \$8 million. This \$17 million projected loss is totally unnecessary. I recognize that some may assert an enhanced deer habitat benefit but, again using Forest Service data, that habitat enhancement would come at a cost of over \$200,000 per deer! Continuing the normal timber sale program will provide similar benefits for wildlife without the huge financial impact.

I urge your agency to restore the 2008 timber sale schedule and to continue to work with the industry and the State of Alaska on the following timber sale activities:

1. Completing the 10-year timber sales as promised. This means 150-200 mmbf each, not 30-80 mmbf as the agency is now planning.
2. Preparing and implementing a 5-year timber sale schedule that provides sufficient economic timber sales to sustain our industry and allow the industry to expand to the level allowed by the 2008 TLMP.
3. Full implementation of TLMP - including utilizing all the lands that were designated as "suitable and available" and making project level changes in Standards and Guidelines where necessary in order to facilitate the preparation of economic timber sales.

Working together we can develop a timber sale schedule that will support long-term jobs with a self-sustaining industry and a perpetual timber supply from 1.5 million acres of the commercial timberlands on the Tongass.

Sincerely,

A handwritten signature in cursive script that reads "Owen Graham". The signature is written in dark ink on a light-colored background.

Owen Graham  
Executive Director  
Alaska Forest Association