

**Earthjustice * Center for Biological Diversity * Defenders of Wildlife *
Greenpeace * Natural Resources Defense Council * Sierra Club *
The Boat Company * Tongass Conservation Society**

November 5, 2010

Mr. Forrest Cole
Forest Supervisor, Tongass National Forest
648 Mission St.
Ketchikan, AK 99901

Re: Integrated 5-Year Vegetation Plan: 2010-2014

Dear Mr. Cole:

Please accept these comments on the draft Integrated Five-Year Vegetation Plan for the Tongass. This letter supplements comments submitted separately by some of our organizations.

We appreciate very much the opportunity, for the first time, to provide input at this early stage in the decision-making, facilitating better public engagement. In short, we support the Forest Service's effort to identify and schedule forest management projects other than old growth timber sales, but we also urge you to make changes to ensure that management actions in the coming years fully implement the agency's stated goal of transitioning rapidly away from old growth logging.

The draft schedule contains many welcome changes from past management. Wildlife habitat restoration, riparian thinning, stream rehabilitation, red pipe remediation, and road storage projects, if planned and implemented properly, offer the potential to create jobs while ameliorating some of the damage from past old growth logging. We also appreciate the fact that no further old growth timber sales are scheduled in roadless areas.

Notwithstanding these important improvements, the draft five-year schedule falls short of the worthy goals identified by the Forest Service. In unveiling the "Transition Framework" on May 26 of this year, Regional Forester Beth Pendleton stated that the Forest Service would be "transitioning quickly away from timber harvesting in roadless areas and old-growth forests." *See* USDA, News Release: USDA Pursues Jobs, Community Stability While Developing New Approach to Forest Management in Southeast Alaska (May 26, 2010) (attached). While the draft five-year schedule commendably avoids roadless areas, it does not reflect a transition away from old growth.

The draft schedule of old growth timber sales reveals no discernable trend, either up or down, over its five-year horizon, but it does call for sales averaging 91 million board-feet (mmbf) per year. This is more than three times the average cut level of 28 mmbf per year over

the last four fiscal years (2007-10). Accordingly, the schedule appears to provide for a substantial, immediate expansion of the current timber sale program, contrary to the Forest Service's stated goals. It would make no sense to begin a transition out of old growth with an expansion. It would also be contrary to the best interests of the communities of Southeast Alaska and of the American people.

We recognize that the Forest Service in the Tongass normally plans for timber sales at volumes greatly in excess of what the agency actually expects to sell, knowing that it will not be possible to find economically viable timber in most of the planned areas. It appears from the draft five-year schedule that the Forest Service intends to continue this practice for at least the next several years. This practice is wasteful and unsustainable, and it is long past time to change it.

It is wasteful, because it means that the Forest Service devotes a great deal of taxpayer dollars and staff time to planning timber sales that will never go anywhere. Those resources could much better be spent on restorative actions and alternative economic opportunities that are uncontroversial, can actually be implemented, and would provide jobs in the region's rural communities.

It is unsustainable, because it is one way the Forest Service highgrades the most valuable timber from the Tongass. Only a small portion of the "suitable" land base in the forest plan has a positive net value for timber. *See* Tongass Land and Resource Management Plan, Final EIS, Vol. II, App. B at B-21 (January 2008) (Table B-3). One result is that the Forest Service greatly over-plans for timber sales to permit the industry to cherry-pick only the highest value stands, as apparently contemplated in the draft five-year schedule. This cannot go on much longer, because the pool of economically viable timber in the Tongass keeps shrinking. The long-term, ongoing decline of the region's timber industry is largely attributable to some 40 years of highgrading under the pulp mill contracts.

Fundamentally, the problem lies with the 2008 forest plan. Numerous administrative appeals of the plan argue that, for these reasons and others, the plan is arbitrary, misleading, and contrary to the regulations and statutes governing national forest management. Even more importantly, the plan does a great disservice to the residents of Southeast Alaska, who deserve a plan that is possible to implement, provides sustainable economic opportunities, and protects fishing, hunting, and other local uses.

We are genuinely heartened that the Forest Service, in announcing the transition framework, appears to recognize these facts. We urge you to act accordingly by: (1) modifying the draft five-year schedule to provide a rapid transition away from old growth logging; and (2) promptly commencing a public process to adjust the forest plan accordingly.

The continued excessive planning for old growth timber sales in the draft five-year schedule gives rise to other concerns, of which we mention just a few:

- The schedule includes old growth timber sales in areas identified as having high conservation value in the conservation assessment prepared by Audubon Alaska and The Nature Conservancy. We urge you to delete those areas.
- The old growth timber sale schedule continues to focus overwhelmingly on Prince of Wales Island (POW), where the Alaska Department of Fish & Game (ADF&G) has identified significant concerns about impacts to wolf populations. These impacts result both from the continued expansion of the island's already substantial road network and the loss of habitat for deer, the wolves' principal prey. Any significant decline in wolf populations will ultimately require reductions in human harvest of deer, at great cost to local residents. We are aware that the Forest Service is currently working with ADF&G to address concerns about wolf management on POW. The two agencies should complete a Wolf Habitat Management Program, as called for in the forest plan, before proceeding with NEPA work for, or implementation of, any further old growth timber sales or substantial new road construction on POW. The 80 mmbf Big Thorne project, which would be the biggest timber sale on the Tongass in many years, is of particular concern in this regard.
- On the draft "Wildlife Restoration" schedule, the Kuiu Stewardship project calls for 4.9 miles of new roads in an inventoried roadless area. It also appears to contemplate old growth logging, since it includes clearcutting as a silvicultural system. We urge you to delete any plans for new roads or old growth logging on Kuiu Island. Kuiu is one of the most heavily degraded parts of the Tongass and should be allowed to recover without new roads or logging. It presents many opportunities for restoration projects, which we would support.
- The schedule includes old growth sales in places that have been controversial with local residents in the past and are likely to be so again, including but not limited to the Central Kupreanof, Navy, Tonka, and Big Thorne sales. The controversy that is likely to result from these and other sales is further reason to amend the schedule to provide for a rapid transition away from old growth logging.

More informed feedback would be possible with more detailed information about the locations of the proposed sales, including unit pools. When that information becomes available, we would be pleased to try to provide you with additional, and we hope constructive, responses.

Thank you for this opportunity to comment on the draft five-year schedule and for the significant improvements in forest management that it reflects. We look forward to working with you to improve it further and to implement a complete and much-needed transition in management of the Tongass.

Sincerely,

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USDA Pursues Jobs, Community Stability While Developing New Approach to Forest Management in Southeast Alaska

Letter to Tongass Future Roundtable Highlights "Transition Framework" for Economic Development and Timber Harvesting Outside of Roadless Areas

WASHINGTON, May 26, 2010-Agriculture Secretary Tom Vilsack today joined with USDA Forest Service and Rural Development leaders, as well as partners in Southeast Alaska, to chart a new path forward in the region that enhances economic opportunities to communities while conserving the Tongass National Forest.

In a letter to the Tongass Future Roundtable, USDA is proposing a "Transition Framework" to provide jobs and community stability for Southeast Alaskan Communities. The Framework will include a series of potential economic development actions to stabilize communities in Southeast Alaska by providing jobs around forest restoration, renewable energy, tourism and recreation, subsistence, fisheries and mariculture. The letter also proposes a new approach to forest management on the Tongass National Forest that builds from the existing Tongass Land Management plan and will move timber harvesting into roaded, young growth areas and away from old-growth timber in roadless areas.

"This Administration is committed to developing a framework to help communities stabilize and grow new jobs," Vilsack said. "The path forward must lead to job creation while protecting old growth roadless areas, and the transitional framework announced today is a big step in the right direction."

"The Forest Service, in partnership with USDA Rural Development and the Department of Commerce's Economic Development Administration, is committed to finding solutions that put Southeast Alaskans back to work," said Forest Service Chief Tom Tidwell. "As part of the broader transition framework we will work to move away from old-growth harvests, toward young-growth management."

"USDA Rural Development is working through its state and area office, as well as here in Washington, to identify and promote sustainable ventures. Last year I traveled to Southeast Alaska for meetings designed to identify opportunities for residents to work together, with support from the government, to build a new, sustainable economy," Deputy Under Secretary for Rural Development Victor Vasquez said. "We support the Forest Service and will work in partnership to diversify the economy of the region."

"We believe it is possible to provide economic opportunity and jobs to our local residents and to sustain a viable timber industry while at the same time transitioning quickly away from timber harvesting in roadless areas and old-growth forests," said Alaska Regional Forester Beth Pendleton. "The Forest Service will focus on a broader suite of opportunities the Tongass can provide to support the economy. Our overarching goal is to work with members of the communities to create jobs in Southeast Alaska."

Below is the letter sent to the Tongass Future Roundtable:

Dear Members of the Tongass Futures Roundtable,

The Tongass Futures Roundtable, the Forest Service and many in Southeast Alaska have been working to chart a path forward in the region that provides economic opportunities to communities while conserving the Tongass National Forest. The Forest Service believes that it is possible to provide economic opportunity and jobs to local residents and to sustain a viable timber industry while at the same time transitioning quickly away from timber harvesting in roadless areas and old-growth forests. Our overarching goal is to work with members of the communities to create jobs in Southeast Alaska.

This letter outlines steps that the agency believes can accomplish this goal. Most of the ideas in this letter are drawn from people and organizations in Southeast Alaska and will require continued input and support from TFR and local communities to be successful. This letter first outlines the results of our efforts to collect ideas from local residents through listening sessions, outlines the steps to develop an economic transition framework for Southeast Alaska, and then focuses on a new vision to forest management in the Tongass that builds from the existing Tongass Land Management Plan.

Regional Economic Development Opportunities

Last fall, USDA Forest Service and Rural Development representatives held a series of listening sessions throughout Southeast Alaska to hear from communities on how we could help improve the economic situation in the region.

As a result of those sessions, USDA is working to develop a "Transition Framework" program. The program will help communities transition to a more diversified economy by providing jobs around renewable energy, forest restoration, timber, tourism, subsistence, and fisheries and mariculture. USDA is joining with Department of Commerce's Economic Development Administration to create the Transition Framework and a project implementation team. The team will work closely with communities and community members, as well as other federal agencies, state and local governments, tribes and tribal corporations, and the for-profit and non-profit sectors.

Our goal is to develop a region-wide job creation platform, with an emphasis on building upon current assets (e.g. workforce and natural resources) and current key economic sectors. We will also look realistically at emerging assets (e.g. through workforce training) and emerging economic clusters (e.g. mariculture). We will take a detailed account of the region's assets and resources and identify ways to promote economic development.

During the listening sessions, we compiled a list of project ideas brought forward by Southeast Alaska communities. The enclosed project idea list is an unfiltered record of those ideas. The Transition Framework project implementation team will use this list as a starting point; the team will evaluate these and other projects for potential implementation based on an assessment of feasibility, agency authority, community and partner support, and potential funding availability. The agencies expect to work with community members to identify and begin some "low-hanging fruit" projects this year.

Within the Transition Framework, we hope to:

- promote small business creation, expansion and retention;
- improve access to capital;
- create quality jobs and sustainable economic growth;
- promote job training and educational opportunities; and
- maximize a forest restoration economy and by-product use.

Forest Management on the Tongass

We believe we can use the forest restoration vision espoused by Secretary of Agriculture Tom Vilsack and USFS Chief Tom Tidwell on the Tongass National Forest to help put people to work. We hope to work with communities to build jobs around a fuller suite of goods and services to provide diversified jobs and community stability.

As part of the broader transition framework, the USFS will work with its USDA

counterpart Rural Development to facilitate a transition of the forest sector away from old-growth harvests and to young growth. Moving towards a forest industry that relies on young growth timber will require a steady supply as the industry makes the transition. This can be accomplished by bridging the transition with long-term stewardship contracts in young growth areas to create investment certainty for forest operator business owners. We believe this transition can be made without entering into roadless areas. To demonstrate this in the near-term, the agency is currently working on a package of stewardship contracts. We expect the first such contract to be offered in early 2011. In the long-term, as young growth stands mature, the expectation is that all timber harvests will be sustained in young growth stands.

The Tongass National Forest is immediately implementing a host of changes to facilitate the transition to young growth, including:

- Hiring a young growth coordinator and initiating a young growth survey on the Tongass to expedite the Forest Service's ability to offer economic projects in young growth areas;
- Hiring a stewardship contract coordinator at the regional level to spearhead bringing training and new expertise to the region and increase the ability of the Forest Service to use long-term stewardship contracts to achieve restoration objectives; and
- Initiating plans for three stewardship contracts to be developed and offered over the next 3 years.

Building from the existing Tongass Land Management Plan, the Forest Service will continue to offer a limited number of old-growth sales in the near-term in roaded forest areas, in order to ensure that a bridge exists for the remaining forest industry infrastructure to make the transition. Allowing these sales and the proposed stewardship contracts to move forward expeditiously is critically important to maintaining a robust forest industry while we transition to young growth.

Additionally, the Forest Service will focus on a broader suite of opportunities the Tongass can provide to support a diversified economy in Southeast Alaska, as described in the transition framework program above. Efforts will focus on creating restoration based jobs, restoring fish and deer habitat to support the fishing industry and subsistence users, and examining energy projects, including small hydroelectric projects and bioenergy, to provide lower cost energy and bring down the costs of doing business in Southeast Alaska. We will also invest in facilities, trails, and other activities to attract increased recreation and tourism use and jobs.

The Forest Service, Rural Development, and the Economic Development Administration look forward to working with the people and businesses of Southeast Alaska, and the local, State, Federal and Tribal governments and corporations that have a stake in the region's economy. We believe we can create a vital, sustainable economy that will provide jobs into the future.

Please take a look at these projects and consider the opportunities they provide. If you have ideas you would like to share concerning the Transition Framework, please don't hesitate to speak to your Forest Service District Ranger or Acting Deputy Regional Forester, Becky Nourse, at 907-228-6282.

Sincerely,

Beth G. Pendleton

Regional Forester

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