

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 from an active research scientist and recreationist on the Tongass National Forest. I appreciate the opportunity to provide input at this early stage in the decision-making and support the Forest Service's effort to identify and schedule forest management projects other than old growth timber sales. I also ask 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 and protecting the biological diversity on the Tongass National Forest. As a biologist, field instructor, and naturalist, much of my livelihood is directly tied to the diversity of the forest, including its wildlife species, rich coastline environments, and ecological structure.

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. I appreciate the fact that no further old growth timber sales are scheduled in roadless areas. However, the plan continues to target areas in roaded portions of the Tongass, which the best available science has identified as biologically diverse and rich regions in need of permanent protection. I request that the 5-year plan remove all timber sales from Prince of Wales Island and Kuiu Island.

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). While the draft five-year schedule commendably avoids roadless areas, it does not reflect a transition away from old growth, and in particular, targets the areas that have been identified as biologically diverse and ecologically important islands on the Tongass National Forest.

The draft schedule calls for an immediate expansion of the current timber sale program, particularly on Prince of Wales Island, which is 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 wildlife and people of Southeast Alaska. A transition out of

old growth logging should assume no more logging of old-growth on Prince of Wales Island, a place where more than 70% of old-growth forest is already gone. Additionally, north Kuiu Island, another heavily logged island, should have no more old growth timber sales, including the North Kuiu timber sale that is included in the draft 5-year plan.

The continued excessive planning for old growth timber sales in the draft five-year schedule gives rise to concerns from the scientific community, based on the best available science, of which I name 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. I urge you to delete those sales.

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. 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 because it further fragments known habitat areas for the endemic Alexander Archipelago wolf, which is a species of conservation concern on Prince of Wales Island, according to state wildlife biologists.

In addition to the endemic wolves on Prince of Wales Island, there are several other endemics of conservation concern that have been identified in public forums between research scientists and land managers on the Tongass National Forest. The Forest Service has stated in both its Conservation Strategy Review (2006) and the Tongass Land Management Plan revision (2008) that it is concerned about endemic organisms on the Tongass National Forest, but it has made little effort in the five-year plan to halt logging on Prince of Wales Island, as recommended by scientists during the 2006 Conservation Strategy Review. Given the best available scientific information regarding endemic organisms on the Tongass (Barry and Tallmon 2010; Cook et al. 2006; Bidlack and Cook 2002), the Prince of Wales Island complex has been identified as a biodiversity "hotspot" for the Tongass, home to many endemic races of organisms including spruce grouse, northern flying squirrels, and the Haida ermine which is currently listed in Canada as an endangered subspecies. These endemic subspecies have a limited range that extends to only a few islands in the entire Tongass National Forest.

In the case of the northern flying squirrels and ermine, their entire range in southeast Alaska is restricted to the Prince of Wales Island complex. The Diesel, Slake, Big Thorne, and Neck Lake timber sales would remove intact habitats utilized by endemic organisms on the island. In addition, the Scratchings timber sale on Suemez Island jeopardizes one of the few islands where

scientists have documented the presence of the Haida ermine (Fleming and Cook 2002).

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. I 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. It presents many opportunities for restoration projects, which I would support. The stewardship project should be explained in greater detail, and it should not include any old growth logging on Kuiu Island. The two species of pine marten found on Kuiu Island (MacDonald and Cook 2007) have a small population that is of conservation concern to the State of Alaska, who, in 2008, closed the trapping season on the island. Further population studies do not indicate that the population is growing, but rather these studies indicate high winter mortality rates for marten on Kuiu Island. Proposed logging would further disrupt and fragment important marten habitat.

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.

I would like to make several other requests regarding this 5-year plan, as well as future initiatives associated with the Forest Service’s commitment to a “rapid transition out of old growth logging” on the Tongass. First, please clarify the details for each stewardship project. This is a national forest that belongs to the American people, and they should have a firm understanding of what stewardship projects will take place on the forest and how they will affect wildlife, recreation, and rehabilitation. Second, please explain all components of the 5-year plan, such as the difference between wildlife projects and rehabilitation projects. It is not possible to clearly comment on each action on the 5-year plan because they are not defined and are left for interpretation. Third, I would like to see an increase in the number of wildlife rehabilitation and research projects offered in the 5-year plan. Specifically, it should be a priority to study the long-term effects on second-growth stand management, including Gap thinning and other commercial thinning practices. Fourth, I would like to see more detailed maps of proposed projects in the final version of the 5-year plan. Right now, the maps do not clearly identify each project in each region according to the activity and area.

Finally, as requested in previous meetings and letters to the Forest Service, if the agency sincerely would like to transition out of old growth logging, it is important to begin by stopping the logging of old growth on Prince of Wales Island and Kuiu Island, two of the most heavily logged islands in the archipelago, with extremely important wildlife habitat for endemic organisms mentioned in this letter.

In a speech by Jerry Franklin, a well-known forester with years of research experience in the Pacific Northwest and a myriad of publications on forest ecology, he said that the Tongass National Forest is really the only place left in most of the world where old growth logging is still happening. It is great to see the Forest Service take a step forward into the 21st century and

commit to ending old growth logging on the Tongass National Forest. Please take further action on your commitment, and begin with drafting a final 5-year plan that does not include timber sales in old growth areas on the Tongass National Forest.

Thank you for this opportunity to comment on the draft five-year schedule and for the significant improvements in forest management that it reflects. I look forward to a much-needed transition on the Tongass National Forest.

Sincerely,

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