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

November 5, 2010

Dear Mr. Cole,

The Wilderness Society appreciates the opportunity to comment on the Draft Integrated Five-Year Forest Management Schedule (Schedule) for the Tongass National Forest. The opportunity to comment at this level of the planning process is a welcome development. As you are well aware, The Wilderness Society strongly supports many of the concepts and stated goals of the Transition Framework (*See* USDA, News Release: USDA Pursues Jobs, Community Stability While Developing New Approach to Forest Management in Southeast Alaska (May 26, 2010)) and we are willing to work with the Forest Service to make the vision a reality.

The Schedule contains many encouraging changes from past management. In summary, we are pleased to see a draft Schedule that includes a diversity of management activities beyond old growth timber that benefit both ecological and community health, and keeps the old growth timber harvest out of roadless areas and largely out of important conservation areas. The plans for wildlife habitat restoration, riparian thinning, stream rehabilitation, red pipe remediation, and road storage offer the opportunity to create jobs while ameliorating some of the damage from past old growth logging. However, we have several concerns and suggestions for improving the current Schedule and the progress on the Transition Framework we wish to share.

Traditional Timber Harvest

The Wilderness Society does not, in general, support old growth timber harvest whether in roaded or roadless areas. While there may be room for small, sustainable sales of Tongass old growth in the future, maintaining an old growth timber program near the historical or current rate presents too many ecological risks in one of the last remaining, largely intact coastal temperate rainforests in the world. Although we do not support old growth clearcutting, we understand the managerial, political, and economic realities associated with transitioning out of old growth. We also believe that a transition, as opposed to losing existing capacity and mills that have important equipment, skills, and experience, is

the best approach to maintain forest related economic opportunities in southeast Alaska. Therefore we believe there must be an identified set of "bridge" timber sales of old growth to maintain the existing industry while it retools to smaller diameter wood. It is through this lens with which we reviewed the current Schedule.

Essential to developing a set of bridge timber sales will be keeping the footprint of the timber program to less controversial areas. Significant work has been done in this regard through the Tonagss Futures Roundtable (TFR) and other collaborative processes, which clearly informed this Schedule. We wish to thank you for incorporating this work and particularly for declining to schedule any timber sales in roadless areas, as well as for staying largely out of important areas of biological conservation as identified in the Conservation Assessment conducted by Audubon Alaska and The Nature Conservancy. Additionally, proposed changes to the Central Kupreanof timber sale, and the intent to modify the Kuiu project to a project tailored to local community interests through a collaborative process, are encouraging changes.

Despite the noted improvements in the Schedule, it does not reflect a transition out of old growth. In announcing the Transition Framework, Regional Forester Beth Pendleton stated that the Forest Service would be "transitioning quickly away from timber harvesting in roadless areas and old-growth forests." While the Schedule limits incursions into Roadless, it continues to offer old growth timber harvest at current levels in addition to other forest management activities in second growth and restoration. We believe a "transition" would reflect a clear trend of declining offers of old growth timber while riparian restoration, restorative thinning, and second growth projects are increasingly offered and implemented as replacement activities and wood supply. For instance in FY 2013, the Schedule calls for 37 million board feet of second growth, yet still offers over 100 million board feet of old growth. This second growth should replace, not supplement, old growth production.

In addition to concerns about the lack of a discernible decline in old growth timber harvest, we are particularly dismayed to see that the Forest Service continues to offer very large sales based on an inflated demand scenario, and that are unlikely to have buyers. For example, it is hard to imagine, given the rapid increase in fuel costs over the past few years, that sales such as Wrangell and Navy will attract a buyer. In one sense there may appear to be no cost if a large sale does not have a buyer, since the logging would not take place. Our concern, however, is that planning such sales squanders valuable Forest Service resources and time that could be better spent on other opportunities, such as second growth inventory or restoration activities. Furthermore, there is a conservation opportunity cost of having excess acres in the timber base. Finally, such sales perpetuate the old cycle of planning and offering sales that conservation groups have concerns with, and will eventually appeal or litigate, making it nearly impossible to end the cycle many interests are trying to break out of. Upcoming sales such as Navy, Kuiu, Tonka and Wrangell will make it especially difficult for us to work with the agency to find the common ground and future we all desire. We recommend dropping sales that are extremely uneconomic, located long distances from existing operators, and are designed simply to fulfill of shelf volume to meet the Tongass Land Management Plan direction.

Second Growth and Restoration

The Wilderness Society has been consistent and clear in its position that sustainable forest management is needed on the Tongass that provides community, economic, and ecosystem benefits. Concurrently, there is a critical need to begin a robust forest and riparian restoration and stewardship thinning program of second growth. We believe thinning efforts and riparian restoration can provide beneficial ecological impacts while jumpstarting the byproduct utilization of second growth trees and "in-the-woods" employment. Therefore, we are heartened to see projects on the Schedule that reflect investments in riparian and terrestrial restoration, particularly all of the watershed restoration projects and the projects on Kosciusko, Heceta, Staney, Spit Point, Carroll Inlet, Tuxecan, and Ocean Boulevard.

Restoration and stewardship on the Tongass can be the bridge that enables the Forest Service, the timber industry, and communities to transition out of old growth timber and into sustainable forest management. Restoration and stewardship can also provide significant employment and beneficial, active management that returns and enhances overall ecosystem health. Finally, restoration provides value to all stakeholders by offering ecological and socioeconomic benefits on a localized level, while reducing resource-based conflicts.

Although we appreciate the development of forest management projects other than old growth timber, there is room for improvement. Given that there are over 200,000 acres of second growth located outside the timber base in need of restoration, there are ample opportunities to offer demonstration projects that facilitate learning about treatments and catalyze investments in new equipment. Furthermore, several of the aforementioned projects have been in development, or on the Schedule of Proposed Actions, for as long as several years. While it is commendable to see these projects in the Schedule, it is evident that they are not receiving the same funding and prioritization as old growth sales. Regional support for the Schedule will be diminished if these projects continue to languish.

Collaboration

We appreciate the willingness of the Forest Service to work with partners in southeast Alaska while developing the draft Schedule and the opportunity to provide feedback. Collaborative restoration and stewardship contracts represent important, near-term opportunities to transition to forest management on the Tongass National Forest that meets some of the social and economic needs of adjacent rural communities while maintaining and improving the forest's ecological integrity. Collaboration, openness, and transparency in the decision-making process will greatly improve our collective ability to agree on forest management activities that benefit ecological and community health. Numerous partner organizations across the Tongass have worked closely with the Forest Service on a project-specific level over the past five years to develop projects and facilitate implementation – Starrigavan, Fubar, Harris River, Sal Creek, and Spit Point are prime examples of model projects.

After several years of leading and coordinating the Restoration Committee of the Tongass Futures Roundtable, we believe an important next step that will facilitate the success of the Transition

Framework will be the creation of a Tongass-wide stewardship group. With strong place-based groups emerging in Sitka, on Prince of Wales, and in Kake, a Tongass-wide group would provide the ability to coordinate the place-based efforts; facilitate learning across projects and partners while advocating for solutions and investments; and work with the Forest Service to develop a forest-wide, collaboratively developed strategic plan for implementing projects in restoration in second growth. We are interested in working with the Forest Service as we initiate this effort.

Moving Forward

The development of the draft 5-year schedule is just the first of many critical steps necessary to fulfill the vision Regional Forester Pendleton laid out in the Transition Framework, and to implement Secretary of Agriculture Tom Vilsack's vision for restoration on our national forests. Specifically, we recommend increased investment in restoration and second growth projects, clarifying language that more clearly explains the intent behind this schedule, and immediately halting planning on sales that are not economically viable.

We have been consistent and clear that in order for us to support the overall Schedule, we must see equal investment in the wildlife habitat restoration, stream restoration, road decommissioning, and other forest management. For too long, old growth timber harvest has driven forest management on the Tongass. The promise of the Transition Framework is to diversify economic opportunities for rural communities beyond timber to the other natural resources the Tongass has to offer – clean water, intact watersheds, abundant wildlife, healthy fisheries, and renewable energy to name a few. Ultimately we would like to see an end to large scale old growth timber harvest in the next 5-10 years. A transition will not only require the Forest Service to plan and offer second growth and restoration projects, but for the existing industry to invest in the equipment and resources to do the work. If old growth continues to be offered at a consistent rate as it is in the Schedule, the industry will have little incentive to invest in a new model of forest management.

Unfortunately, some of the most promising, innovative projects developed to date have languished for a lack of investment from the Forest Service. Operators in Southeast Alaska have expressed keen interest in conducting restoration projects, as well as demonstrated plans to retool to second growth and byproduct utilization. Yet funding for several of these projects has yet to materialize. As long as old growth timber harvest, and the subsequent investments, continues to be prioritized over restoration projects, a transition will never happen. To get beyond this hurdle, we recommend substantially increasing investments in the restoration work.

Additionally, we recommend developing specific language and guidelines that accompany the Schedule. In the absence of clear guidelines or a statement of intent, in times of conflict (or agreement) on future projects, stakeholders have nothing to guide their work together. In its current form, the Schedule leaves us with significant questions and includes a lack of clarity. Specifically, the categories wildlife management, wildlife and forest management, and forest management are undefined and leave one guessing. In addition to clarifying those terms, a set of guidelines could include recommendations for

collaborative processes, describe preferred treatments or prescriptions, clarify how the out-years will be developed, and specify the long-term version and intent behind the forest management activities. Finally, we will reiterate our interest in the cancellation of timber sales that are highly uneconomic and irrelevant to existing capacity.

We look forward to continuing to work with the Tongass National Forest and Regional Forest Service to make sustainable forest management on the Tongass a reality and to implement the Transition Framework. Thank you again for the opportunity to provide feedback.

Sincerely,

Karen Hardigg
Alaska Forest Program Manager

Evan Hjerpe, Ph.D.
Resource Economist

cc: Beth Pendleton, R10 Regional Forester
Tricia O'Connor, Deputy Forest Supervisor, Tongass National Forest