

Southeast Alaska Conservation Council

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August 16, 2013

VIA email and hand delivery

Beth Pendleton, Regional Forester
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Re: Appeal of the Big Thorne Project ROD and FEIS

This is an appeal of the Record of Decision (ROD) and associated Final Environmental Impact Statement (FEIS) for the Big Thorne Project. Forest Supervisor Cole signed the Big Thorne Project ROD on June 28, 2013.

This appeal is filed pursuant to 36 CFR Part 215 on behalf of the Southeast Alaska Conservation Council (SEACC). SEACC is eligible to appeal this decision because we fully participated in the entire planning process, including the submission of timely comments on the Draft Environmental Impact Statement (DEIS) in December of 2012. See Big Thorne FEIS, Vol. II, Appendix B, Table B-1 at B-2.

A "Notice of Availability" of the FEIS and ROD was published in the Ketchikan Daily News on July 1, 2013. A corrected "Legal Notice of the Decision" was published in the Ketchikan Daily News on July 2, 2013. Therefore, the appeal period for this decision ends August 16, 2013, and this appeal is timely.

I. Altered Purpose and Need Unreasonably Narrowed the Range of Alternatives Considered for the Big Thorne Project.

The Notice of Intent for Big Thorne explains that "[t]he purpose and need for the Big Thorne Project is to implement the Tongass Land Management Plan, aligned with the United States Department of Agriculture (USDA) Strategic Plan FY 2010–2015 and the Tongass National Forest transition strategy." 76 Fed. Reg. 7807, 7808 (Feb. 11, 2011). The NOI acknowledged that "[t]his project will help to provide an economically viable, reliable, long-term supply of timber."

The Purpose and Need identified in the FEIS is much narrower:

The purpose and need for the Big Thorne Project is to contribute to a long-term supply of economic timber for the timber industry on Prince of Wales Island and on the Tongass National Forest in general (including both large and small operators), in a manner that is consistent with the multiple-use goals and objectives of the Tongass Land and Resource Management Plan (Forest Plan).

The Big Thorne Project is proposed at this time to respond to the underlying need for a reliable, economic, and long-term timber supply, as well as to respond to the goals and objectives identified for the project area by the Forest Plan and move the project area toward the desired condition described in the Forest Plan (see Appendix A to this EIS and pages 2-1 and 2-2 of the Forest Plan).

FEIS at 1-4. Instead of the timber supply representing one of the Forest Plan's multiple goals and objectives for this project, it became the predominant one. By narrowing the purpose and need following the notice of intent, the Forest Service unreasonably narrowed the range of alternatives considered for the Big Thorne Project.

In order to justify allocating enough lands to provide a timber supply as high as 267 mmbf in the 2008 TLMP Amendment, the Forest Service manufactured a need for an integrated forest products industry in Southeast Alaska that "would require a reliable supply of economic timber from the Forest." See 2008 TLMP Amendment ROD at 17. In an effort to frame this "need" as an outcome of Tongass-wide multiple-use balancing, the Forest Service claimed that "establishment of an integrated industry would further the goals of ecological, as well as economic, sustainability [on the Tongass]." *Id.* This claim is arbitrary because it runs counter to evidence before the agency of persistent, long-term negative trends in Tongass timber demand and its own routine information and agency research about Tongass timber and the regional economy.¹

In adopting a Forest Plan, the Forest Service is required to balance competing multiple use objectives to achieve a mix of uses – both timber and non-timber – that maximizes long term net public benefit. The National Forest Management Act (NFMA), see 16 U.S.C. § 1604(e)(2), incorporates a definition of multiple use from the Multiple Use Sustained Yield Act, which requires that all national forest renewable resources must be "utilized in the combination that will best meet the needs of the American people..." 16 U.S.C. § 531(a).

In response to comments on the Big Thorne DEIS, the Forest Service asserts that Tongass "multiple-use goals are addressed at the Forest-wide level, not at the level of individual projects." FEIS, Appendix B at B-58. We disagree.

¹ See SEACC Appeal of the 2008 Amendment to the Tongass Plan, # 08-13-00-0027 (May 15, 2008). By this reference we incorporate Appeal #080-13-00-0027, cited references, and attached exhibits, into the appeal record of the Big Thorne Project.

The Forest Supervisor explains when evaluating the effects of the Selected Alternative on subsistence resources and uses that:

“[t]he Forest Plan determined which uses are suitable for various areas of land within the Tongass National Forest through land use designations (LUD) and management prescriptions. The Forest Plan has determined that the Big Thorne project area should be managed mostly for varying levels of timber production . . . but with recognition of other resource uses. . . .”

ROD at R-3. TLMP, however, did not itself authorize logging 148.9 mmbf from the Big Thorne project area, modify 11 small old-growth reserves in order “to provide a robust and stable supply of timber,” increase forest fragmentation, reduce functional connectivity among reserves, reduce the amount of deer winter habitat, or “reduce the ability of project area WAAs to maintain a sustainable wolf population based on deer habitat capability alone.” See ROD at R-15-16, 22, 23, 25, 26.

The Forest Service can’t have it both ways. It can’t argue that Forest Plan goals and land allocations force it to maximize timber production on lands within the Big Thorne Project Area but then argue it lacks the discretion to recalculate competing multiple uses in the project area when deciding how much, how fast, and precisely where that logging occurs. As noted in the ROD for the 2008 TLMP Amendment (at p.2):

Forest plans are programmatic in nature; they do not by themselves, authorize activities such as timber harvest or road construction that affect the environment. Rather, when an individual project (such as a timber sale) is proposed, the Forest Service undertakes a site-specific analysis of its likely environmental effects and renders a formal decision on it. . . . Thus, forest plans do not have environmental effects. . . .

In conjunction with programmatic multiple use obligations on the Tongass, the Tongass Timber Reform Act (TTRA) further directs the Forest Service as follows:

Subject to appropriations, other applicable law, and the requirements of the National Forest Management Act of 1976 (Public Law 94-588), except as provided in subsection (d) of this section, the Secretary shall, to the extent consistent with providing for the multiple use and sustained yield of all renewable forest resources, seek to provide a supply of timber from the Tongass National Forest which (1) meets the annual market demand for timber from such forest and (2) meets the market demand from such forest for each planning cycle.

See 16 U.S.C. § 539d(a)(emphasis added). As explained in the Joint Explanatory Statement of the Committee of Conference, the Conference substitute added the qualification “seek to meet” market demand for timber “to the extent consistent with providing for the multiple use and sustained yield of all renewable resources.” The Conference further explained that the phrase “renewable forest resources” included “fish and wildlife and is intended to encompass

commercial, recreational and subsistence use of such resources.” House Conf. Rpt. 101-931, at 14 (1990) *reprinted in* 1990 U.S.C.C.A.N. 6267-68.

Thus, the TTRA requires the agency to consider multiple use and sustained yield on the Tongass at both the programmatic and project-level planning stages. Instead of allowing the Forest Service to rely simply on forest-wide balancing of multiple uses, the TTRA requires the Forest Service to address competing demands for timber and the commercial, recreational, and subsistence use of fish and wildlife resources at the project area scale.

In response to comments, the Forest Service stated that:

The previous administrations made a commitment to the forest products industry in Alaska for four, 10-year timber sale contracts to aid in stabilizing the existing industry infrastructure and to provide a basis for an integrated forest products industry.

...

... The Forest Service still strives to meet the intent of the September 2008 letter, which is to have a fully integrated forest products industry in Southeast Alaska to help diversify and strengthen the local economy.

FEIS, Appendix B at B-95.

To the extent that the Forest Service uses TLMP’s desired conditions, goals and objectives to handcuff its balancing of multiple uses at the project level, where the irretrievable commitment of forest resources to timber production actually occurs, the Forest Service is violating Section 101 of the TTRA. To the extent the re-establishment of an integrated timber industry on the Tongass provided the agency with justification to allocate more lands to timber development than reasonably necessary to seek to provide a supply which meets realistic predictions of market demand over the planning cycle, the Forest Supervisor’s reliance on TLMP’s multiple use balancing to justify choosing the Selected Alternative for the Big Thorne timber sale project is arbitrary.

II. The Big Thorne ROD Fails to Make Subsistence Findings Required By Law, and the Findings Made are Arbitrary and Capricious.

The subsistence evaluation conducted for the Big Thorne timber sale concluded that “all of the action alternatives may result in a significant restriction of subsistence uses of deer. . . .” ROD at 42. Before the agency can proceed with this timber sale, the Forest Supervisor must determine that such a restriction is “necessary, consistent with sound management principles for the utilization of the public lands,” would “involve the minimum amount of public lands necessary to accomplish the purposes of such use, occupancy, or other disposition,” and “reasonable steps will be taken to minimize adverse impacts on subsistence uses and resources.” *See* 16 U.S.C. 3120(a)(3).

Instead of determining whether such a significant restriction is necessary and consistent with sound management of public lands, the Forest Supervisor “determined that the Selected Alternative strikes a balance between meeting the resource needs of the public and protecting the forest resource.” ROD at 43. The decision to approve the Selected Alternative is arbitrary because it relies on factors Congress did not intend it to consider.

Even if one accepts the premise that “striking a balance” is equivalent to finding the significant restriction is necessary, this determination runs counter to the evidence before the Forest Supervisor. The record does not support the conclusion that such balancing ever took place. Giving the Forest Supervisor a chance to articulate more precise findings will not make his decision reasonable because such a conclusion would run counter to the evidence before him. Consider:

1. The ROD claims that while ANILCA “emphasized maintenance of subsistence resources and lifestyles [it] also required the Forest Service to make timber available for harvest from the Tongass National Forest.” *Id.* This argument ignores the fact that the 1990 TTRA subsequently amended ANILCA to end the preferential treatment given timber by eliminating both the mandate to make timber available from the Tongass and the permanent appropriation of at least \$40 million to supply that timber.
2. The Forest Supervisor acknowledges the effects of further logging in the project area on deer habitat, but points out that he only “weigh[ed] the need for access against the need for resource protection . . .” ROD at 11. In the context of this project-level decision, “sound management of public lands” encompasses far more than identifying which roads need to be closed and when. The Forest Supervisor’s decision is arbitrary because he did not weigh other relevant factors influencing the effect of further logging in the project area on deer habitat and subsistence deer hunting. Such factors include decisions concerning the number, size and location of cutting units, the logging prescriptions selected for each unit, or whether modifications to the biologically preferred locations of small old-growth reserves in the project area provides comparable wildlife habitat and function.
3. The assertion that the Selected Alternative somehow strikes a balance is undermined by the record, which demonstrates that the Forest Supervisor never actually weighed the long-term consequences of the Selected Alternative to subsistence and sport deer hunters versus the short term benefits of a large-volume timber sale. No attempt was made to directly compare the economic benefits to subsistence resources and uses from reducing the volume of timber offered from the Big Thorne project area against the economic consequences to the timber industry. This is particularly egregious here because the method for the rigorous economic analysis of the effects of the Big Thorne project to subsistence is known and outlined by the Forest Service in the FEIS, but not applied. In response to comments, the agency pointed out that:

“Evaluating the impacts of the alternatives on subsistence . . . would require quantifying the potential impacts to subsistence in pounds of edible resources foregone. In the case of deer, it would require estimating the actual number (or at least a reasonable range) of deer affected, negatively or positively, by the alternatives.”²

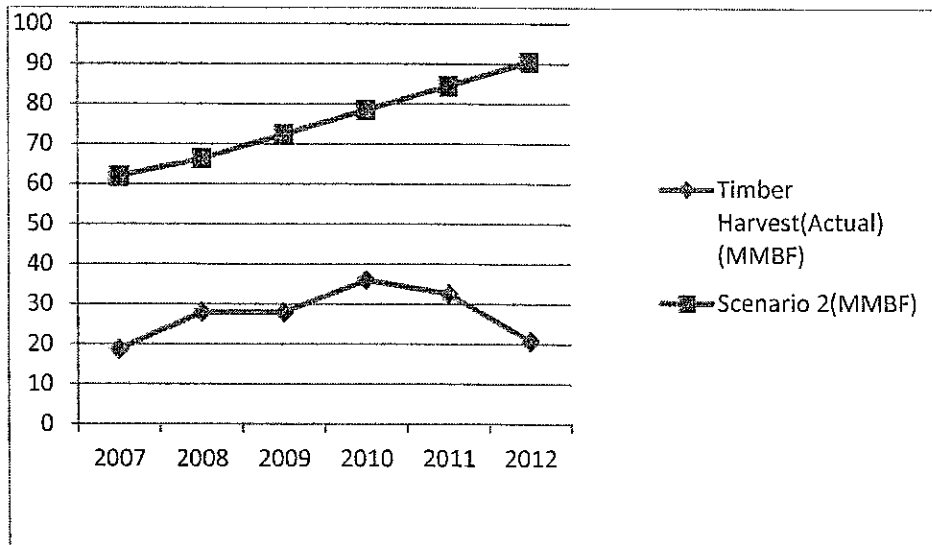
4. The ROD claims (at R-43) that “[f]ish and wildlife habitat productivity will be maintained at the highest level possible for the Selected Alternative.” See ROD at 25. This reasoning is arbitrary because it runs counter to the evidence that modifications to the small old-growth reserves approved in the Selected Alternative will “reduce inclusion of deer winter habitat and low-elevation POG (indicative of higher value habitat) in the reserve system.” *Id.*
5. The State of Alaska and U.S. Fish and Wildlife Service recommended dropping numerous proposed cutting units because of the importance of travel corridors and winter range to deer survivability. Instead of dropping these units, the Forest Service added many to the Selected Alternative or increased the volume of timber cut in the unit. See e.g., Units 15, 19, 25, 89, 98, 106, 182, 184,190, 203, 440, 446, 469, 470, 471.
6. The extent to which the Forest Supervisor accepted the projected cumulative landscape effects on deer habitat and subsistence uses of deer under the Selected Alternative on the “the need to provide an economic timber offering that will contribute to the annual market demand for Tongass National Forest timber,” the decision is arbitrary. See ROD at 4. The methods used to estimate annual timber demand consistently overstate actual demand and those demand estimates present misleading information on the economic effects of the Big Thorne project and allow the Forest Service to give timber goals greater precedence over competing subsistence deer hunting goals without justification.

As far as the balancing undertaken by the Forest Supervisor is based on application of the updated formulas and procedures for forecasting annual market demand (Alexander 2008), which incorporates the updated planning cycle scenarios developed by Brackley et al. 2006, it fails to reflect sound management principles. A comparison of these scenario projections with actual logging levels over the same period call into question the entire validity of the scenario modeling process. Compare Table A-1, FEIS Appendix A at A-7 with Figure A-1 at A-4. This model has failed to predict actual performance for each of the past six years, and there is no explanation offered to suggest that its performance will somehow improve this year. Clearly, neither the scenarios developed to estimate alternative demand projections over the life of the plan, nor the updated methodology for forecasting annual market demand, reflect reality.

² See FEIS, Appendix B at B-13 (citing Kline 2006).

Comparison of Scenario Projections with Actual Cut Levels

Year	2007	2008	2009	2010	2011	2012
Timber Cut (Actual) (MMBF)	18.7	28	28	36	32.6	20.8
Scenario 2(MMBF)	61.9	66.4	72.4	78.5	84.5	90.5



Using economic projections based on unrealistic assumptions instead of actual cut levels to justify impacts to subsistence from the Selected Alternative renders the determination to offer the Selected Alternative arbitrary. The Forest Supervisor's failure to consider obvious discrepancies between projected and actual cut levels when determining whether significant restrictions to subsistence resources and uses are necessary presents a clear error in judgment.

Likewise, the explanation in the FEIS and ROD for the amount of timber made available under the Selected Alternative, and the resulting impacts to subsistence deer resources and users in the project area, are so implausible that they cannot be ascribed to a difference in view or the product of agency expertise. To the extent the Forest Supervisor relied on "accomplish[ing] the purpose of this project" to support a finding that the Selected Alternative uses the minimal amount of public lands necessary (ROD at p. 43), this determination is arbitrary. Like the "necessary" finding, the Forest Supervisor failed to account for the inaccuracy of the projections relied upon undermines the reasonability of this determination.

While the measure of what is "necessary" or what is "minimal" is "the purpose of such . . . disposition," the Selected Alternative is not the only alternative considered in the FEIS that meets the purpose of the Big Thorne project. *Cf. Hoonah Indian Assoc. v. Barton*, 170 F.3d 1223, 1230 (9th Cir. 1999)(record established that findings for that timber sale decision were not arbitrary and capricious). The availability of other alternatives which also meet the Big Thorne

Project's purpose but provide more protections to subsistence resources and users makes approval of the Selected Alternative arbitrary. *See* ROD at pp. 34-35 ("Alternative 4 meets the purpose and need of this project, implements Forest Plan direction, and works toward attaining its goals and achieving its objectives . . . [and] is the environmentally preferred alternative for the project area.").

The fact that existing law may prevent the Forest Service from advertising this alternative for sale at this time, does not reasonably justify the Forest Supervisor's decision not to select it because the agency never took a hard look at any modifications that could improve the economics of this alternative. Such modifications could combine reductions in the proportion of sawtimber from commercial thinning of young growth, a reduction in the amount of volume using helicopter logging systems, or shrinking the size of individual timber offerings.

While we support the Forest Service's effort to make a rapid transition away from a timber program focused on large-scale old growth logging, we also support reasonably assuring that folks who live on POW and depend on renewable forest resources to meet their basic food and cultural needs can continue to do so. The Tongass Transition Framework is not just a new timber management program; it can provide both jobs-in-the-woods and conserve the region's natural resource base that supports the strong commercial fishing and thriving outdoor recreation and tourism sectors, and customary and traditional hunting, fishing and gathering. The latter forms the critical foundation for the entire region's economy and culture.³ Logging watersheds vital to local food gathering makes wild foods less accessible, increasing an already challenging food-cost correlation for rural Alaskans.⁴ This is precisely why Section 101 of the TTRA and Section 810 of ANILCA require multiple use balancing at the project level.

Finally, the Forest Supervisor's "reasonable steps to minimize" finding is premised on a clear error as to the applicable Forest-wide Standard and Guideline. While the ROD accurately notes that "[s]ubsistence use is addressed specifically in a Forest-wide Standard and Guideline" is accurate, the Forest Plan does not require that "[f]ish and wildlife habitat productivity will be maintained at the highest level possible for the Selected Alternative, consistent with the overall multiple-use goals and improved protection of the Forest Plan." *See* ROD at p. 43 (emphasis added). The applicable Forest-wide Standard and Guideline actually provides that:

Consistent with the purposes for which National Forest System (NFS) lands in Alaska were established, sound management principles, and the conservation of healthy populations of fish and wildlife, the utilization of the National Forest System lands in Alaska is to cause the least adverse impact possible on rural residents who depend upon subsistence.

³ Alaska Economic Trends at 15 (May 2011) available at <http://labor.state.ak.us/trends/may11.pdf> (reviewed June 14, 2013).

⁴ *Id.* "Living in Alaska involves higher costs no matter where you live, but living in rural Alaska increases those costs even more."

See 2008 TLMP Amendment, SUB I.A.1 at 4-68 (emphasis added). The failure to identify and apply the appropriate Forest-wide Standard and Guideline represents a clear error of judgment, makes this subsistence finding arbitrary, and fails to assure consistency with the Forest Plan as required by the National Forest Management Act.

III. Forest Service Uses Unrealistic Employment Estimates to Support Selected Alternative.

The decision to approve the Selected Alternative was rationalized in no small part on the basis of the projected 600-689 direct annualized jobs that will result from implementation of the Selected Alternative. See ROD at 11. This benefit was also emphasized in the public meetings and press releases surrounding the announcement of the project decision. The provenance of these jobs figures was discussed in the FEIS (at p. 3-35):

Annualized jobs are employment estimates adjusted to be based on a full year even though the employment may be seasonal. The resulting employment estimates would not all occur in one year and estimated job-years do not directly translate into numbers of affected workers. The job and income estimates presented in Table TSE-13 are approximate numbers based on average jobs per MMBF ratios that were estimated using harvest and employment data from 2007 to 2010.

The 600-689 jobs figure is not real payroll jobs or numbers of real people employed, nor is it purported to be. It is a rewording of the Selected Alternative's timber volume as expressed in a linear relationship to employment. "Annualized jobs means (sic) this is all the employment this amount of sawlog input produces, no matter how long the project is." See Alexander (2012).

A common-sense interpretation of the job numbers touted by the ROD, the FEIS, agency officials in public meetings, and the agency press releases, reveal how meaningless the "600-689 jobs" numbers actually are. Coffman Cove and Thorne Bay combined have a population of 647. (FEIS pp. 3-12--3-16) Is every man, woman, and child in these small towns to be employed by the Big Thorne project? Is there to be an influx of population for two or three years that will double the population of these towns despite a critical lack of housing and other infrastructure like water and sewer in the island communities? The owner of Alcan Forest products recently stated that he currently struggled to hire workers because of "workers lacking driver's licenses, workers with no training, unmotivated workers, drug use and workers with workers with (sic) parole officers."⁵ So where exactly will these 600-689 workers come from?

This is a flawed method when used to compare alternatives, grossly overstating the true numbers of people on industry payrolls, and of no added value when making a choice between alternatives. More projected timber volume will mean more annualized jobs by this method, so the jobs figure is meaningless as a mere restatement of timber volume. Contrary to the careful

⁵ Nick Bowman, *Ketchikan employers: What state can do*, Ketchikan Daily News, Jan. 24, 2013 at 2 (attached as a pdf for inclusion in the Big Thorne Project Appeal Record).

caveats of the FEIS, the gaudy numbers seem to have captured the imagination of the decision maker, and weighed heavily in the selection of alternatives.

One of the stated purposes of this project is to prop up local employment, logging infrastructure, and industry-related skills until such time as second growth harvest is the major economic driver of the timber industry on the Tongass. Exaggerated and nonsensical jobs claims do nothing to further the goal of a reasonable and measured transition to a sustainable future of timber management on the Tongass. They certainly should not have been used to make important decisions about the size of the Big Thorne project.

This problem is compounded because “actual employment and income in Southeast Alaska would depend on choices made by purchasers Under current market conditions, purchases are likely to export as much as they can” FEIS at 3-35. Although Alexander (2012) specifically accounts for increased annualized job numbers related to transportation and other services “per MMBF of net sawlog volume exported out of state to domestic and foreign markets,” the employment coefficients do not explicitly account for export of sawlogs when calculating the annualized jobs “per MMBF of net sawlog volume harvested.” The Forest Service’s response to comments on this issue does not address the potential effects of this discrepancy. *See* FEIS, Vol. 2, Appendix B at B-10, 11. Thus, when touting the economic benefits of the Selected Alternative, the use of incomplete and misleading economic data for the Big Thorne project frustrates the public’s evaluation of project alternatives in violation of NEPA. *See NRDC v. USFS* 421 P.3d 797, 812-13(9th Cir. 2005).

As discussed more fully below, the unreliability of timber volume estimates for the Selected Alternative likely inflate the job benefits from the decision and are most likely inflated. The resulting disclosure of misleading economic benefits frustrates the public’s evaluation of project alternatives in violation of NEPA.

IV. The Forest Service’s Assumption that Falldown Will Not Occur During Implementation of the Big Thorne Project is Arbitrary and the Failure to Disclose and Evaluate the Environmental, Social, and Economic Impacts from any Falldown that May Occur Violates NEPA.

In describing the purpose behind this timber sale, the Forest Service points to “the need to contribute to a long-term supply of economic timber for the timber industry,” and the objective “to maintain flexibility and stability in the sale program.” FEIS at 1-4. It further claims that this sale responds “to the underlying need for a reliable, economic, and long-term timber supply.” *Id.* at 1-5. The Forest Supervisor rationalizes his decision, in part, because it will “produce an even-flow of saw timber and other wood products.” ROD at 11.

Thanks to the courageous efforts of a former Forest Service timber planner, the Forest Service had to take steps to account for the consistent pattern of data, experience, study, and analysis that falldown generally occurs in timber sale implementation on the Tongass. Falldown is the shortfall between the number of acres and volume of timber planned for logging and those actually logged. In the 1997 Tongass Plan Revision, the Forest Service used a Model

Implementation Reduction Factor to reduce the amount of suitable forest lands to account for falldown by approximately 32 percent. During the 2008 TLMP Amendment, the Forest Service reduced the falldown factor to 23 percent “as a result of updates to the geographic information system and other data.” *See* 2008 TLMP Amendment ROD at 6, note 3.

Given this project’s emphasis on economic stability and providing for a stable, long-term supply of timber to local mills, SEACC raised “falldown” as a significant issue for the Big Thorne timber sale. Project falldown is a significant issue, because even though the Forest Service has reduced estimates of available timber supply at the forest planning level, implementation of TLMP has consistently revealed additional project-level falldown above the programmatic estimates assumed forest-wide. A consistent pattern of data and experience from implementing timber sale projects on the Thorne Bay and Craig Ranger Districts approved under the 1997 Revised TLMP and the 2008 TLMP Amendment shows that project-level falldown is likely to occur in the Big Thorne project area.

The Forest Service has a responsibility under NEPA to disclose and evaluate the potential environmental, social, and economic effects of any falldown that could occur.⁶ Without this analysis, neither the public nor decision-makers can evaluate the economic viability of project alternatives or objectively evaluate the economic benefits associated with particular alternatives. Falldown is likely to be most prevalent in places like the Big Thorne project area, which has been subject to multiple entries over more than 70 years.

In response to our comments on the DEIS, the Forest Service acknowledged that falldown occurs at both the programmatic and project levels. *See* FEIS, Volume II, Appendix B at B-28. Nonetheless, the FEIS includes no discussion of falldown associated with timber sales issued after the 2008 TLMP Amendment, even those adjacent to the Big Thorne project area – namely the Logjam Timber Sale. Despite the existence of agency data showing a 29 percent reduction in volume during implementation of the Diesel offering, and a 33 percent reduction from planned volume in the Slate offering, the Big Thorne FEIS only mentions the total old-growth timber approved for the Logjam Timber Sale. *See* FEIS at 3-6 (“[Logjam] was approved for 73 MMBF of old-growth timber harvest from 3,422 acres.”).

According to Alaska Region reports detailing timber volumes under contract or permit for fiscal years 2010 through 2012, a total of nearly 59.8 mmbf has been cut from the Diesel and Slake offerings under the Logjam Timber Sale.⁷ This total represents only 82 percent of the total volume approved in the Logjam ROD. If this much falldown occurs with the Big Thorne project, the falldown could affect as many as 117 of the annualized jobs estimated under the Selected Alternative.

⁶ By this reference, SEACC incorporates all the records provided SEACC by the Forest Service on May 5, 2011 and August 18, 2011 in response to our Freedom of Information Requests dated April 7, 2011 and July 25, 2011, into the Big Thorne Appeal Record.

⁷ Available at (http://www.fs.usda.gov/detail/r10/landmanagement/resourcemanagement/?cid=fsbdev2_038785 (last viewed August 6, 2013)).

The FEIS violates NEPA because the evidence and analysis presented inflate projected economic benefits and discount environmental impacts from the proposal. The failure to disclose and evaluate project level falldown means the USFS presented incomplete and misleading economic effects of the Big Thorne project that frustrated the public's evaluation of project alternatives in violation of NEPA. *See NRDC v. USFS* 421 P.3d 797, 812-13(9th Cir. 2005).

V. Request for Relief

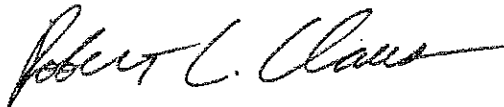
For the reasons stated above, SEACC requests the Appeal Deciding Officer:

Reverse the June 28, 2013 ROD for the Big Thorne Project;

Remand the Record of Decision and FEIS for the Big Thorne Project to the Forest Supervisor with instructions to adopt the environmentally preferred alternative, Alternative 4;

Close all roads built or re-opened under Alternative 4 as soon as possible to help address wolf survivability issues.

Best Regards,



Bob Claus
Forest Program Director

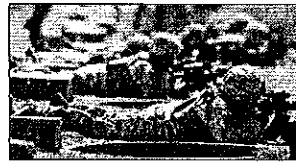


Buck Lindekugel
Grassroots Attorney

Kings ready to roll



• Looking for another SE title, See page 6



Pentagon lifts ban on women serving in combat, Page 5

KETCHIKAN DAILY NEWS



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Ketchikan employers: What state can do

By NICK BOWMAN
Daily News Staff Writer

A panel of Ketchikan employers and industry representatives discussed their needs, and how the state could help fill them, in a meeting with the Alaska Workforce Investment Board on Wednesday.

On the panel were Mike Round, Ric Nichols, Graham Neal, Barbara Morgan, and Jason Carter, representing the Ketchikan Marine Industry Council. Neal, a manager of Heatherdale Resources' Niblack Project on Prince of Wales Island, explained what stage the Vancouver-based company was at with the mine and employment projections for the tentative projects, which might include an ore-processing mill on Gravina Island.

He said that Heatherdale expects 130 jobs at the POW mine and 65 jobs at the mill, adding that Alaska's 9,000 mining-related jobs have paid an average salary of \$42,000.

2013 will be a keystone year for the company in determining the future of the Niblack project, according to Neal, and if it gets the green light, Heatherdale is hoping to acquire permits to mine in 2014. If all goes as planned, he said the mine will begin operations in 2016.

Much of the mine is on 250 acres of property patented by the original owners of the mine in the early 1900s, Neal said, which will make it easier to acquire the permits.

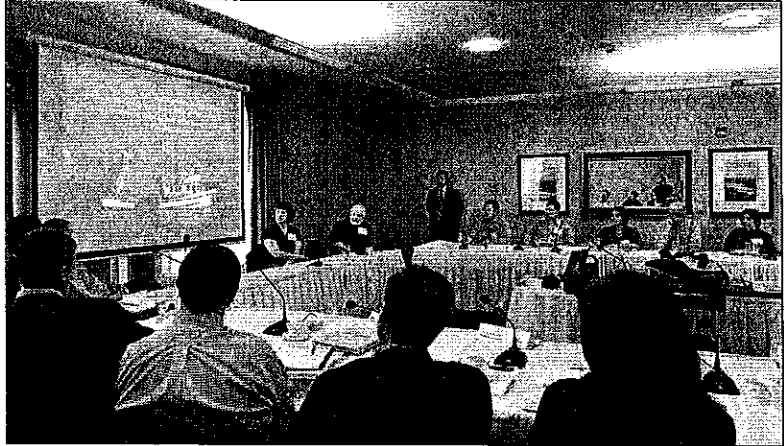
Round, assistant general manager of Southern Southeast Regional Aquaculture Association, started the discussion with a history of the association, which was created by the Alaska Legislature after three years of "catastrophic" salmon harvests in Alaska from 1973 to 1974. The state saw a catch of approximately 20 million salmon annually each year for the period.

"These three years in a row were just about enough to knock the commercial fishing industry out of business," Round said. "Each year they took out a loan thinking fish would be coming back the next year and each year they went farther and farther into debt."

At 160 million fish, the average return for the past 10 years is eight times greater than levels in the 1970s. Ketchikan's association was created in 1978 and operates four hatcheries in Southeast Alaska at Whittman Lake, Neets Bay, Barnett Inlet on Ritou Island and Crystal Lake, near Petersburg.

Round provided data to emphasize his association's role in Ketchikan fisheries. The aquaculture association was responsible for \$47.6 million in economic activity in Southeast Alaska because of fish released. In recent years it has released 25 percent of the volume of fish caught and 15 percent of the volume. This past year it was responsible for nearly 40 percent of the catch's value.

It also releases 27,000 salmon annually that are harvested by sport and charter fishermen, according to Round. Southeast was also the most successful fishery in the state, according to Round. Southeast was also the most successful fishery in the state, according to Round.



Oceanus/Alaska's Barbara Morgan, right of screen, listens as Mike Round, from Southern Southeast Regional Aquaculture Association, next to Morgan, speaks about the fishing industry Wednesday at the Alaska Workforce Investment Board meeting held at the Sunny Point conference center.

MTAB members miffed at Alaska Class-change surprise

By MARK D. MILLER
Juncos Empire

JUNEAU — Members of the Marine Transportation Advisory Board questioned Alaska Department of Transportation and Public Facilities Commissioner Pat Kemp and his staff during the board's meeting Tuesday in Juncos on charges announced last month to ferry procurement plans.

While Kemp was acting commissioner of the DOT&PF, the state announced late last year that it was abandoning its plans to order a 350-foot-long Alaska-class ferry in favor of getting two smaller ferries for less than what department staff and Gov. Sean Parnell said the Alaska-class vessel would cost.

MTAB, the role of which is to advise the DOT&PF and governor on issues related to the Alaska Marine Highway System, was not contacted before the announcement was made.

"Tuesday's meeting at the Vocational Training and Resource Center, MTAB members expressed dismay that state officials did not tell the board about their plans to change direction on the ferry proposal."

"I feel like as a board member, it was one-sided, and I don't appreciate that feeling," said Maxine Thompson.

"You know, MTAB has been right there for the whole system."

MTAB Chairman Robert Venables echoed Thompson, while Gerald Hope and Joshua Ilvoava voiced similar sentiments.

"I think that everybody on this board was pretty taken by surprise by this announcement," Ilvoava said.

Vice-Chairman Mark Nilsson offered warmer words for the changes to the plan than did his fellow members, but he agreed with Thompson nonetheless.

"I actually think it's a very good plan," said Nilsson. "But my issue's with communications and how we heard about it. The MTAB board deserves better than that, in my opinion."

Kemp, along with AMHS General Manager Capt. John Falvey, Deputy Commissioner Reuben Yost and Coastwise Corp. Principal Engineer Patrick Blachardt, a consultant on the project, laid out the state's reasons for moving away from the Alaska-class ferry proposal toward the two smaller ships, which were described as "dayboats" that would provide service in Lynn Canal between Juneau and Haines and Haines and Skagway.

"The project cost for the Alaska-class ferry was estimated

'So if I understand this correctly, we can't build one vessel for 350 feet for \$116 million, but we're going to build two 300-foot vessels for the same amount of money?'

— MTAB member Ron Bresette

'Something, isn't it?'

— DOT Commissioner Pat Kemp

at between \$150 million and \$170 million last year, according to Kemp, representing a significant overrun from the \$120 million appropriated for the new ship.

"I think what had happened was we let the public involvement process take over on the design of the ship, and we started adding amenities and things like that, and no one was watching the fiscal constraint on it," Kemp said. Kemp went on to say that Parnell and DOT&PF staff de-

clined to hit the "reset button" and steer the project back toward its original 2006 concept as a "shuttle ferry" for Southeast Alaska, as well as toward procuring two ships with fast vehicle loading and unloading capability.

"It takes two day boats to provide the service in Lynn Canal that's currently being provided by the (MTAB) Malaysia," said Yost, referring to the larger ferry that is a

See "MTAB," page 3

Parnell seeks change in cruise waste rules

By BECKY BOHRER
Associated Press

JUNEAU — Gov. Sean Parnell is proposing changes to the way the state regulates wastewater from cruise ships despite objections from critics who say the bill would roll back provisions of a 2006 citizen initiative that required cruise ships to meet state water quality standards when dumping wastewater.

The proposal, SB229 in the state Senate, is scheduled for its first hearing Wednesday in front of the chamber's Resources Committee.

The measure would require that cruise ships discharge wastewater in a manner consistent with applicable state or federal law, according to a sectional analysis. It would strike the more stringent requirement that discharges meet state water quality standards at the point of discharge.

It also would allow authorization of mixing zones if ships meet certain standards for treatment of discharge. The systems used either would have to be an advanced treatment system or the ship would have to use methods that achieve the quality of effluent comparable to one or more ships using an advanced system.

Gershon Cohen, project director with the Campaign to Safeguard America's Waters, said the proposal isn't based on the best available science.

"The best science for what puts people and marine ecosystems at risk are the Water Quality Standards," he said in an email. "Using public waters to dilute waste isn't good science, it's simply risk management. It is saying, how much risk are we willing to take on to not require a polluter to clean up their discharges?"

He also said a science advisory panel, tasked with looking at pollution and pollution control issues, "refused to acknowledge" some treatment devices work better than others and that combinations of technologies could reduce emissions below the water quality standards at a "minimum" cost to each ship.

Parnell, in his transmittal letter, cited a report by the panel that found none of the advanced wastewater treatment systems on ships operating in Alaska waters could consistently meet water quality standards at the point of discharge for "constituents of concern" — ammonia, copper, nickel and zinc.

The panel did not identify new or additional technologies that would consistently meet the discharge criteria, he said.

Parnell said the advanced systems being used "are significantly more effective and produce a

higher quality discharge than most municipal systems."

"Even without incremental improvements to cruise ship wastewater quality, aquatic life and human health are protected through provisions in the current cruise ship General Permit that restrict the location of discharge and when ships must be underway before they discharge," he wrote.

The report dated November 2012 is marked preliminary. Guy Archibald, mining and clean water coordinator for the Southeast Alaska Conservation Council, said he's not sure what the rush is to "repeal" the 2006 initiative, which has already been modified.

For example, in 2010, the Legislature passed a reduction in the cruise passenger head tax. The move was aimed at attracting more ships — which Parnell says it has — and at settling a lawsuit with the Alaska Cruise Association, which it also did.

Cohen was kicked off the science panel after questions were raised about his objectivity — concerns he said were bogus. He referred to mixing zones as "regionalized pollution" zones.

"So much for Alaska fish being the best in the world because of our pristine waters," he wrote in an email.

Bill brings back defined benefits

Would offer state workers choice

JUNEAU (AP) — An Alaska senator has reintroduced legislation that would give public employees the option of a defined-benefit pension program.

Sen. Dennis Egan, D-Juneau, said in a news release that the measure, SB340, is cost-neutral, and will give employees a choice. Alaska went from a defined-benefit pension program to a defined contribution, 401(k)-style, benefit in 2005. Union leaders last year testified that this had hurt efforts to retain employees.

Egan got a similar bill passed through the Senate near the end of the regular session last year, but it died in the House.

The Parnell administration spoke in opposition to Egan's bill last year, with Deputy Commissioner of Administration

Mike Barnhill saying no defined-benefit bill can guarantee it won't face unfunded liabilities.

A stock market dive, rising health care costs and actuarial mistakes have contributed to Alaska's current unfunded pension liability of \$11 billion. Egan's office said it expects his bill to save the state \$40 million in the first five years and to cost nothing over the long term because it shifts the risk of rising health care costs between the employer and the employee.

Egan called the proposal a "win-win."

"The state saves money, while creating incentives for teachers, troopers, firefighters and other public servants to stay and keep their talents — and their retirement money — right here in Alaska," he said.



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SPORTS • WORLD • ALASKA • NATION
Page 2: Kennicott's Saturday Rupert run canceled
www.ketchikandailynews.com

Today's Trivia:
Which was the first Alaska Marine Highway System vessel? Answer, Page 2

Workforce

Alaska in 2012, a feat normally reached by Bristol Bay. The Southeast catch amounted to \$163 million, \$56 million of which were raised in hatcheries. Round said.

Of the fish released by the association, 97 percent are chum salmon, he said, because they're ready to release almost as soon as they hatch.

Round's world isn't free of concern — he touched on an aging fishing fleet and the sharp increase in the capital investment required to become a commercial fisherman.

"For whatever reason there was a huge influx of people into the fishing industry," Round said. "Right now the average age of a skipper in an Alaskan fleet is about 50."

He said when he began fishing he was able to buy an old boat and learn the trade by trial-and-error — a process that's no longer possible today.

"Today, that industry is fully matured," Round said. "Nobody can afford to go in and make mistakes. They have to hit the ground running. So affordable capital is going to be really important."

The Alaska Young Fisherman Summit, created by the Alaska Sea Grant Marine Advisory Program, is put on to educate potential fishermen about the technology, loan programs and politics of the fishing industry, according to Round.

"The aquaculture association isn't the only Ketchikan entity producing resources for Alaska and West Coast businesses. Morgan, research and education coordinator of OceansAlaska Marine Science Center, has been working for the past year to produce oyster and goodie clam seed for purchase by farmers."

"We were asked by the industry to step forward and help them succeed," Morgan said, who compared the current shellfish farming situation to that of New Zealand in the 1980s.

"New Zealand went from being a struggling industry to being a multi-million dollar industry because the government there made a concerted effort to ... help that industry succeed," she said.

OceansAlaska's first growing seasons was cut short in 2012 by construction, but Morgan is expecting to produce between 5 million and 10 million oyster seed and 100,000 goodie seed in the 2013 season.

Morgan said water conditions South have strained seed production to an extent that oyster farmers in Southern California and up the West Coast are call-

ing OceansAlaska looking for seed.

She said OceansAlaska's two full-time employees and a part-time bookkeeper are not able to meet demand, and are consequently looking at expanding into a space three or four times the size of their current facility.

"We have mazed out how much equipment we can put in the building we're currently in," she said. "We're looking at being able to produce up to 50 million oyster seed. It's a lot of oyster seed, but it's not going to satisfy all the farmers in the south. It will satisfy Alaska's need."

OceansAlaska is seeking greater funding and the resources to bring experts from the Lower 48 to provide training to grow more effectively and a wider array of seed and algae, Morgan said.

Ketchikan's timber industry is facing a lack of quality workers, rather than of product, according to Nichols, owner of Alcan Forest Products.

He said that ever since the timber industry in Southeast dropped to approximately 300 people from between 6,000 and 10,000 people, the quality of workers has fallen off as well. Nichols said he's now struggling with workers lacking driver's licenses, workers with no training, unmotivated workers, drug use and workers with workers with past offenses.

"Fifty to 60 percent of my employees don't have a driver's license," Nichols said. "I had a crew of eight guys, and one guy had a driver's license. We were 10 guys have we were going to get back and forth from the site every day."

He said the judicial system makes it difficult for his employees with a heavy load of fines — some as large as \$15,000 — to get enough money to get their license back.

Workers with criminal records who have to meet with parole officers make working in remote locations difficult, Nichols said.

"We work in a remote environment," he said. "We work in crews. We get one guy that has to see his PO for the afternoon, either he has to take the day off or the whole crew has to come in early. Why can't the PO work after hours? Once those guys are in the judicial system, the best thing we can do is keep them employed."

"This is how bad it got: Pacific Lumber across the bay over here, every first Monday of the month was called Felon's Day. Felon's Day was a day off for everybody so that anyone who needed to go see

their PO could go see them for that day so they didn't have to shut the mill down on and off."

Nichols said he's also troubled by heavy drug use in some low-skilled workers that makes them a danger to equipment and others around them.

"The first problem he mentioned, however, was a lack of experienced workers."

The workforce investment board, which was meeting on Wednesday and Thursday, was in Ketchikan for the first time in its history.

IN BRIEF

Kennicott schedule changes
KETCHIKAN (KDN) — Severe weather in the Gulf of Alaska will affect ferry schedules in Ketchikan beginning Friday, according to the Alaska Department of Transportation.

The state ferry Kennicott's departure from Kodiak was delayed until 1 p.m. Wednesday, with a ripple effect delaying services to Chomgay Bay, Whittier, Yakutat, Gustavus, Juneau and Ketchikan.

The Alaska Marine Highway System has canceled the Kennicott's previously scheduled Jan. 26-27 nonstop voyages between Ketchikan and Prince Rupert, British Columbia.

The Kennicott now is scheduled to arrive in Ketchikan from Juneau at 9 a.m. Sunday, according to AMHS. The southbound will depart Ketchikan at 4:30 p.m. Sunday northbound for Juneau.

AMHS has scheduled the ferry Duke to sail between Ketchikan and Prince Rupert early next week.

The Duke will depart Ketchikan for Prince Rupert at 8:30 p.m. Monday, returning northbound with a departure time from Prince Rupert of 7 a.m. Tuesday.

AMHS staff is contacting affected passengers, according to the agency. Further information is available from the Ketchikan AMHS terminal, or the AMHS central reservations office.

Teleconferences

Legislative teleconferences are scheduled on the following dates at the Legislative Information Office, 1900 First Ave., Suite 310. The following list is not all-inclusive; check with the LIO for updates. There usually is a time limit on testimony, which is allowed at hearings unless

otherwise indicated.

Thursday
7:30 a.m.: Senate Special Committee on In-State Energy; overview presentation by Alaska Energy Authority. Listen-only.

1 p.m.: Joint Senate-House Transportation Committee. Public testimony regarding new direction on Alaska ferry acquisition. Overview of aviation by DOT Deputy Commissioner Steve Hatcher.

Friday
3:30 p.m.: Senate Resources, SB 29, cruise-ship wastewater discharge permits.

Today's Trivia answer:

Q: The Malaspina, which arrived in Juneau on its maiden voyage 50 years ago on Jan. 24, 1963:

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The residents and staff of the Ketchikan Pioneer Home would like to **CONGRATULATE ALLIS MAY DAVIS** on her upcoming retirement. Please join us for dessert on Friday, January 25 @ 1:30 p.m. in the Great Room of the Ketchikan Pioneer Home and help us wish her all the best in her future adventures.

POLICE REPORT

KETCHIKAN POLICE
Jan. 14

At 2:07 p.m., police arrested a 31-year-old Ketchikan man on an outstanding warrant. He was taken to Ketchikan Correctional Center, where he was held on \$5,000 bail.

At 11:11 a.m., police arrested a 27-year-old Ketchikan woman on an outstanding warrant. She was taken to Ketchikan Correctional Center, where she was held on \$500 bail.

At 12:15 a.m., police stopped the driver of a white Chevrolet for a minor traffic offense.

They determined that the driver, a 48-year-old Ketchikan man, was issued a misdemeanor citation for driving with a suspended license and sixth-degree control-substance misconduct.

At 7:45 a.m., police were sent to a Barnev Avenue address on a report of a woman attacking a man. Police arrested a 57-year-old Ketchikan woman for fourth-degree domestic assault. She was taken to Ketchikan Correctional Center, where she was held without bail.

At 10:45 a.m., police were sent to the scene of a hit-and-run accident involving two vehicles in the 3800 block of Tongass Avenue.

Police used witness statements to contact the driver, a 20-year-old Ketchikan man, and issued him a misdemeanor citation for driving without a license.

At 11:54 a.m., police arrested a 46-year-old Ketchikan man on a parole violation. He was taken to Ketchikan Correctional Center and held without bail.

At 3:06 p.m., police were sent to Grand Street on a report of a domestic fight. Police arrested two 21-year-old men for fourth-degree as-

sault and violating the conditions of his release. He was taken to Ketchikan Correctional Center, where he was held without bail.

At 1:19 a.m., police arrested a 27-year-old Ketchikan woman on an outstanding warrant. She was taken to Ketchikan Correctional Center, where she was held without bail.

At 2:11 p.m., police arrested a 33-year-old Ketchikan man on two outstanding warrants. He was taken to Ketchikan Correctional Center, where he was held without bail.

At 4:10 p.m., police arrested a 22-year-old Ketchikan man on an outstanding warrant. He was taken to Ketchikan Correctional Center, where he was held without bail.

At 4:10 p.m., police arrested a 22-year-old Ketchikan man on an outstanding warrant. He was taken to Ketchikan Correctional Center, where he was held without bail.

At 12:41 a.m., police arrested a 24-year-old Ketchikan man on an outstanding warrant. He was taken to Ketchikan Correctional Center, where he was held without bail.

At 11:23 p.m., police stopped the driver of a black Honda for an equipment violation.

The officers arrested the driver, a 20-year-old Ketchikan man, for driving with a suspended license. He was taken to Ketchikan Correctional Center, where he was released on his own recognizance.

At 6:52 p.m., police arrested a 36-year-old Ketchikan woman on an outstanding warrant. She was taken to Ketchikan Correctional Center, where she was held on \$500 bail.

At 11:23 p.m., police stopped the driver of a black Honda for an equipment violation.

The officers arrested the driver, a 20-year-old Ketchikan man, for driving with a suspended license. He was taken to Ketchikan Correctional Center, where he was released on his own recognizance.

MEETINGS

"Meetings" is a public service column the Ketchikan Daily News provides for use by individuals and nonprofit organizations to announce free meetings that are open to the public. The deadline for copy is 2 p.m. the day before the first day the notice is to be published, with a 5 p.m. Friday deadline for Saturday, Sunday or Monday meetings. Meeting announcements will be published only twice. No guarantee of publication accompanies acceptance of the notice and on occasion the column must be shortened because of limited space.

Telephone numbers, fundraising events and for-profit activities will not be published. The column may not be used to satisfy advertisement of public meetings. When submitting a notice, please include the organization name, meeting time, date and location. Please provide a contact name and telephone number for the Daily News to verify information.

THURSDAY
Inter-Island Ferry Authority Board of Directors: 10 a.m., Inter-Island Ferry Terminal, Hollis, and by teleconference.
Senior Services: 10:30 a.m., bingo;

Klawock
Planners of Alaska Igloos 18 and 75-50 p.m., Planners' Hall, installation 2013 officers with Grand President Jerry Krier.

Just For Today AA: 5:30 p.m., 1736 Tongass Ave.
Tongass 11th: 6 p.m., Ketchikan Indian Community.

Craig AA: 7 p.m., Craig Presbyterian Church.
Just for Today AA: 8 p.m., 1736 Tongass Ave.

FRIDAY
Senior Services: 10:30 a.m., exercise class; noon, porcupine meatballs with pasta lunch; 12:30 p.m., card games; 1:30 p.m., shopping.

Out to Lunch Bunch AA: Noon, SL John's Episcopal Church undercroft.
Klawock Women's Talking Circle: Noon, Alicia Roberts Medical Center in

John's Episcopal Church undercroft.
AAFP: 1:15 p.m., The Plaza mall, second floor. Program: Local grocery Ben Williams on why food prices continue to rise and what to anticipate in the coming months.

Directly advocacy and leadership support: 3:30 p.m., SAIL office.
Crafts group: 7 p.m., WISH, 2002 First Ave.

Friday Evening AA-Anon: 7:30 p.m., Presbyterian Church, 2711 Second Ave., lower level.

AA: 7:30 p.m., 1736 Tongass Ave.
Just for Today AA: 8 p.m., 1736 Tongass Ave. (Speaker meetings on second and last Fridays of the month.)

NA Unity Group: 8 p.m., Lutheran Church upstairs, 1200 Tongass Ave.

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Ketchikan South Tongass Highway
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Project No. 10160184-0002(18)
You are invited
OPEN HOUSE Public Meeting
Wednesday February 6, 2013 4 to 7 pm
Ted Ferry Civic Center 888 Venetia Avenue Ketchikan
The Alaska Department of Transportation and Public Facilities is beginning a project to reconstruct a highly traveled segment of South Tongass Highway from Grant Street to Deermont Street (locally known as Front, Hill and Steadman Streets) located in the central urban area. The project team will kick off its work with a meeting in Ketchikan on February 6, 2013.
The purpose of the project is to provide for the safe passage of pedestrians and vehicles within the South Tongass Avenue downtown corridor. Anticipated roadway improvements will include rehabilitation and replacement of the pavement surfaces, and reconstruction of the roadway subbase and storm drainage improvements as needed. In addition, the project will reconstruct or improve the intersections of Dock, Mission and Steadman Streets including pedestrian crossings and add traffic calming measures. Pedestrian improvements will include repairing and widening sidewalks as necessary in accordance with Americans with Disabilities Act (ADA).

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