

AlaskaRainforestDefenders

A regional environmental organization established in 2011 (formerly GSACC)

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April 29, 2018

Subj: CTLLA

Sent via: comments-alaska-tongass-petersburg@fs.fed.us

Dave Zimmerman
USDA Forest Service
Petersburg Ranger District
PO Box 1328
Petersburg, AK 99833

Thank you for the opportunity to submit “additional thoughts and input” for the Central Tongass Landscape Level Assessment (CTLLA). Alaska Rainforest Defenders previously submitted ideas for the CTLLA which included a recommendation that the assessment focus primarily on recreation and other forest uses that normally don't receive much attention in your planning documents.

The Forest Service has prematurely limited the scope of the CTLLA

While the Forest Service has aggressively sought public input, they have just as aggressively ignored it, unless of course that input doesn't interfere with their predetermined proposed action regarding timber removals of at least 150 MMBF.¹ According to the CTLLA website Public Input Summary², a variety of projects proposed by the public have already been eliminated and have been prematurely determined to be a “Forest Plan Issue” or are “Outside the Agency/Project Scope”. This despite the agency assertion that during this phase of the assessment they are only “gathering ideas” and that public input would “help determine the location and types of activities to be pursued and how extensively they would occur.” In fact, the January 18, 2018 Dear Reader letter indicated:

¹ This is the amount of timber identified to be removed under the CTLLA during the March 7, 2018 Petersburg CTLLA Open House by the Petersburg Ranger District Silviculturalist.

² CTLLA Project Summary/Spreadsheet: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd576528.pdf

“We will consider all potential opportunities for young-growth and old-growth timber harvest, sustainable recreation, watershed restoration, fish or wildlife habitat improvements and other components of local community interest within the project area.”

How can your agency claim to “consider all potential opportunities” when it has already eliminated many of those brought forward by the public, and far in advance of the project’s entry into the NEPA process? Notably, those already eliminated include ones by various publics that advocate for no further old growth logging, allowance for second growth stands to recover to OG conditions, and no new road construction. If you are true to your written word, then these options are perfectly viable. It is troubling that the Forest Service sees fit to consider from even *before* the outset of the NEPA process, only those alternatives leading to their predetermined end result. Clearly, the “public” part of the assessment process is pure PR and this project’s purpose is in fact, *to clear massive volumes of timber for Viking Lumber, Inc. in the Central Tongass*—nothing more.

The Forest Service's intentions in disregarding public viewpoints that can legitimately be incorporated into a distinct alternative are obvious. The shield the agency is using against constructing such an alternative—especially given that this is project is at a pre-scoping, pre-purpose and need stage—is illegitimate. The purpose and need can be constructed to encompass the directions we requested in our comments. We demand that this be done and that the eventual NEPA document include an action alternative, studied in detail, that does not include any old-growth logging, allows second growth to recover, and has no new road construction.

Sincerely,

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

Rebecca Knight
for
Alaska Rainforest Defenders