

# Alaska Rainforest Defenders

A regional environmental organization established in 2011 (formerly GSACC)

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Subj: CTLLA

Sent via: [comments-alaska-tongass-petersburg@fs.fed.us](mailto:comments-alaska-tongass-petersburg@fs.fed.us)

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

Alaska Rainforest Defenders (ARD) submits the following response for the Central Tongass Landscape Level Assessment (CTLLA). ARD (formerly GSACC) is a regional conservation non-profit organization in Southeast Alaska that was formed in 2011. ARD seeks to foster protection of southeast Alaska's fish, wildlife and their habitats and our Founding Principles adhere to the rigorous application of best available science. Our membership uses public lands throughout the region, including the Central Tongass, and is composed of commercial fishermen, sport and subsistence users, and small businesses that have a direct interest in the sustainable development and biological integrity of Southeast Alaska's regional natural resources. We support habitat protection as an overriding concern. Our website is <http://alaskarainforest.org>.

## **General Comments**

After decades of Forest Service sanctioned, taxpayer subsidized, industrial logging of the Central Tongass National Forest area it is time for the Forest Service to take a new and more modern approach to its stewardship of publicly owned lands. The Central Tongass is comprised of Kuiu, Kupreanof, Zarembo, Wrangell, and Etolin Islands, associated smaller islands, and the nearby mainland. All of these locales have greatly diminished habitat from historical old growth timber removals.

ARD recommends that this assessment, focus primarily on recreation and other forest uses that normally don't receive much attention in your planning documents.

However, if planning for timber removals is included in the assessment, the document should clearly note that the Tongass is the last national forest where large-scale clear-cutting of old growth trees is permitted. In fact, the Tongass is no different from old growth forests elsewhere and is not immune from the physical consequences that led others to decide that old growth logging is not beneficial to forest health. Improving Tongass forest ecosystem health can be best achieved by halting all old growth logging and second growth logging in important habitat areas like the Central Tongass. Large scale commercial exploitation in these areas should not be pursued in order that the forest can recover from the damage that has already been inflicted upon it.

It is important to note that the economy of Southeast Alaska has changed dramatically in the last several decades. The tourism industry is now by far the fastest growing and largest non-government employer in Southeast Alaska and these visitors are not coming here to see eroded clear cut National Forest Land and damaged or destroyed salmon habitat. They are coming to see something they can't see and experience anywhere else - publicly owned land that was set aside by wise leaders in the past, for present and future generations to enjoy in all its natural splendor.

If by our actions we allow National Forest Land to continue to be exploited as it has been in the past then we risk not only destroying a big part of the local Southeast Alaska's economy we are destroying the legacy we were entrusted with to preserve in perpetuity.

A wild, natural and healthy National Forest is critical to sustaining our wild, natural and healthy local fisheries which is key in promoting our wild, natural and healthy "Last Frontier" image that millions of American visitors come here to see and experience every year.

Properly managed, these public forest lands can handle untold numbers of multiple forest users both local and from out of state who come here to hike, fish, camp, hunt or just to experience the silence of an old growth forest on a wild Alaskan coastline. As long as we ensure that each and every public land user follows the “Leave No Trace” policies these forest lands will be available today, tomorrow and for generations to come.

It is time for the Forest Service to take a new direction and promote preserving our remaining old growth forests while repairing the devastation caused by mismanagement in the past.

It is time for the forest to heal.

### **Specific Recommendations for the CTLLA:**

We support maintenance of existing forest infrastructure as the first project to be tackled under the CTLLA. Decommissioning of many miles of central Tongass logging roads should be recommended under the assessment. We recognize funding is severely limited for other than road construction and timber related projects and this point should be made clear to the public from the outset of the CTLLA process. In other words, the CTLLA should not be used to promote unrealistic, non-timber projects where the public is lulled into thinking their pet wish list for projects will become reality when the CTLLA’s likely underlying purpose is to advance long-term logging projects.

### **Insufficient Public Notice**

The CTLLA is not identified on the current Forest Service’s Schedule of Proposed Actions (SOPA) (<https://www.fs.fed.us/sopa/forest-level.php?111005>). This serious oversight is very troubling since the general public needs access to information about the project. Please correct this issue and allow adequate additional time for the unaware public to respond.

## **An Environmental Impact Statement (EIS) is required for the CTLLA.**

Your cover letter indicates that the purpose of the CTLLA landscape level approach is “to plan a project on a large spatial scale and increase the number of activities authorized in a single analysis and decision,” and further, to “use the National Environmental Policy Act (NEPA) process.” Additionally, you “plan to identify and analyze the environmental effects of a variety of activities that can be implemented over the next 10 to 15 years.” Given the scale of this proposed assessment, the planning document should be in the form of an EIS.

## **Any Agency Promotion of a CTLLA Ad Hoc Committee Would Violate the Federal Advisory Committee Act**

In advance of any temptation by your agency (or its grant-making arm, the National Forest Foundation) to encourage, initiate, fund, or provide direction for an ad hoc group to assist in development of alternatives for the CTLLA, please be advised that such efforts by the Forest Service will violate the Federal Advisory Committee Act. We strongly advise against such an effort and encourage you to instead use NEPA’s mandate to “[e]ncourage and facilitate public involvement in decisions which affect the quality of the human environment.” [40 C.F.R. § 1500.2(d)].

## **Timber Alternatives**

We request that any alternatives in the NEPA CTLLA document that include timber removals, specify that associated timber contracts include language that holds the purchaser solely responsible for the consequences of their actions. This includes timber slash cleanup, all rehabilitation and genuine forest restoration, and road maintenance. These expenditures should be acknowledged as the true cost of doing business on the Tongass. Also, rigorous oversight and inspections to verify that these activities have been achieved must be conducted. This is especially important since the FS’s Washington Office 2016 Activity Review found a severe lack of logging operations oversight and enforcement on the recent Tonka and Big Thorne sales.

### **Roads, Red Pipes, and Trails**

No new roads, temporary or permanent, should be constructed in the project area. The Central Tongass already has too many road miles and efforts should be made to responsibly decommission many of these roads, not just walk away from them and allow “vegetative closures”.


As we have repeatedly requested, all TNF red pipes which block fish passage must be repaired. This would be an excellent point under the CTLLA to begin a long overdue maintenance program for existing infrastructure. Please list and identify the current number of red pipes existing and the amount of all road miles within the CTLLA project area, as well as the species affected and amount of upstream habitat impacted.

While we are not opposed to responsible conversion of Central Tongass roads to trails, we are interested in the methods for such conversion, and also believe trail motorized access must be prohibited in order to protect other uses of the forest. We realize funding for these ventures is quite limited making such conversions highly unlikely.

### **Deer habitat-Game Management Unit 3**

As you are likely aware, in Game Management Unit 3 has suffered numerous Sitka-Blacktail deer hunting closures and reduced bag limits during the past few decades. These circumstances are due at least in part to habitat loss from decades of industrial-scale logging. Although deer populations may have rebounded somewhat during the last 2-3 years, this winter’s deep snow may likely reverse that trend. Consequently, further timber removals in GMU-3 should be off-limits for the life of the assessment.

Thank you,

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

Rebecca Knight  
for Alaska Rainforest Defenders