



March 7, 2018

David Zimmerman
District Ranger
Petersburg Ranger District
Petersburg, AK 99833

Dear Dave:

Thank you for the opportunity to comment on the Central Tongass Landscape Level Analysis.

Saw-Timber Harvest

Small-scale timber operators are a relatively new component of our local economy and a potential area for economic growth and diversification. The USFS has an obligation to supply timber to industry, but has never adequately provided saw-timber for the small mill operators in Petersburg and the surrounding area.

It is both disappointing and frustrating to see the Agency initiate another multi-year planning exercise, which will undoubtedly occupy all available staff, rather than focus on addressing a known and identified need in our local economy that has been languishing since early 2013.

We note Earl Stewart's letter of November 16, 2015 requesting the Mitkof Island Sale, which included a saw-timber component and a micro-sale component, be withdrawn provided the following rationale:

"After considering the local industry's concern...an opportunity exists to improve the project's scope of work to both provide a supply of timber that facilitates the transition to an industry based primarily on young-growth, as well as support the transition of the existing local industry."

Providing young growth was an "additional" benefit of the sale, not the primary purpose or stated need, moreover the existing local industry is not requesting access to young-growth. The local industry on Mitkof Island and Wrangell Island and Kake is seeking a small, consistent supply of saw-timber, accessible from the existing road system.

Lastly, it has been 3 years and no improved scope of work has been released; with the initiation of the CTLLA, it would seem at least another three years will go by without any action. In the meantime, the local mills are forced to purchase wood from Prince of Wales Island to fill orders or hope that there are sufficient salvage sale opportunities in the coming years.

This should be a priority for the District, rolled out prior to and separately from any other timber offerings and should be prioritized over the CTLLA.

Diverse Employment Opportunities

One of the CTLLA's stated goals is to diversify natural resource employment opportunities. By definition, diverse employment opportunities are the result of a diverse economy. The CTLLA is a limited tool to achieve this goal.

Economic diversity is rarely born simply out a planning exercise rather it is the result of directed multi-faceted efforts starting with planning and extending into workforce development, cultivating entrepreneurial ecosystems, creating market demand, and continued reinvestment. The Agency would need to seriously expand its scope of work and tool set to be successful at this or enlist the aid of partner agencies.

Given the current toolset: SE Alaska has long been a resource-based economy with limited investment in value-added products. One way the Agency could support a diverse natural resource economy is to support value-added wood industries by providing a steady supply of saw-timber and micro-sales to local entrepreneurs. Additionally, the Agency could set up work session so small operators can understand the various authorities used for commercial timber sale and other non-timber forest products. See previous comment for more on this topic.

Beyond timber harvest, the jobs associated with managing the forest bring a significant amount of diversity into our communities. In the last ten years, federal employment in Petersburg has dropped by 35 average annual jobs; the majority these lost jobs were with the Forest Service. While the agency is shrinking regionally, the FS should do everything to minimize impact on smaller communities. Federal employees have the highest average wages in our community so these jobs have a significant direct impact to our economy as well as corollary impacts such as decrease enrollment in schools, etc. Prioritize retaining and moving Tongass-wide jobs INTO smaller communities, like Petersburg. Consider implementing a policy of “no net-loss” of USFS jobs for these communities. The Agency should utilize its ANILCA local hire authority to fill professional level jobs with Alaskans whenever possible. This will do even more to stabilize local communities and diversify natural resource employment opportunities.

Tourism

The visitor industry is a growing component of our economy. Ongoing partnership between the Chamber of Commerce and the FS to operate the Visitor Information Center is mutually beneficial and needs to be preserved.

Banana Point

Several years ago the Petersburg-Wrangell-Kake Resource Advisory Committee funded a project to improve the Banana Pt boat ramp. The project was funded in two phases. For some reason, the Agency pulled funding for phase two of the project. The ramp is an important transportation connection between Petersburg and Wrangell, and provides best access to Stikine and other Forest lands for residents for recreation and subsistence activities. The Agency could work with both communities to identify alternative funds, such as FLAP, to complete this important project.

Good Neighbor

USFS has expertise in some specialized areas that could be useful to local communities, such as developing forest inventories, wetlands inventory, identifying soil stability and landslide areas. Joint projects would benefit both community and overall interest of the FS to promote good land stewardship. It isn't clear what authority the Agency has to work cooperatively with local communities. It would be useful to the community if the Agency could provide some guidance of what is possible or examples of cooperative projects in other places.

Carbon Credits

There is opportunity for local communities to benefit from the growing market for carbon credits, particularly by participating in the California Cap and Trade Program. Local governments do not have the capacity to establish or engage in such programs, nor the expertise to even determine baseline levels needed to begin discussions. The Agency should work collaboratively with local communities, provide expertise as needed, to assist local communities interested in exploring this opportunity.

We recognize that some of the issues we've raised are outside the scope of the CTLLA, but it's important for the Agency to realize that to achieve the goals they have set for themselves, they will need to consider options outside the scope of the CTLLA.

Sincerely,

Liz Cabrera
PEDC Coordinator

