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Carey Case
Petersburg Ranger District
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September 24, 2018

Re: Central Tongass Project Scoping Comments

Dear Mr. Case,

Defenders of Wildlife (Defenders) appreciates this opportunity to comment on the above-referenced project. Established in 1947, Defenders is a national, science-based non-profit conservation organization. With 1.8 million members and supporters nationwide, including over 6000 in Alaska, Defenders works to conserve and restore native species and habitat throughout the country, including on numerous national forest system lands. We have actively participated in many project-level Forest Service actions on the Tongass, as well as the recent Tongass Forest Plan Amendment, and we value our engagement with your agency as a Tongass stakeholder.

Community Interests and Project Scope

Overall, it does not appear that the general public from the three communities directly affected by this project is especially interested in commercial-scale logging. To judge from the input received to date, these communities are far more interested in recreation/tourism development, maintaining or adding infrastructure, small-scale logging opportunities for local processing, and ensuring continued subsistence activities than logging old-growth forests commercially. Commercial-scale old-growth logging need not be a part of the Central Tongass Project in order for the project to be successful and very responsive to both local community desires and the national interest in protecting our largest national forest, the most intact temperate rainforest in the world. At minimum, the EIS should analyze an alternative that excludes the commercial old-growth logging component and emphasizes investment supporting the other activities noted above.

Issues Deemed "Forest Plan Issues or Beyond Agency Scope"

The Summary of Public Input document prepared for this project is expressed in a matrix wherein the comment is identified and classified into one of five categories. One category is “Forest Plan Issues or Beyond Agency Scope,” which presumably is intended to convey that the comment cannot be implemented as part of this project because of countervailing Forest Plan dictates or limitations in agency authority.

Some of the comments or suggestions thus classified, however, appear to be potentially consistent with the Forest Plan and not beyond the agency’s authority. Examples include comments to omit old growth logging in order to improve forest conditions; to consider the market for carbon credits as part of the economic analysis; and to not build additional new roads as part of the project.

These appear to be issues that an EIS could reasonably explore, and are not precluded by the Forest Plan or beyond the project or agency scope.

Economic Viability

The EIS should closely examine the factors bearing on the economic viability of this project, including the challenging market conditions, costs of operating in the project area, and the extent of any public subsidization needed to improve project economics such as roadbuilding or allowance of timber for export. We understand the political pressure that the Forest Service receives to provide economic timber sales, yet the agency cannot alter the fundamentally unsound economics of the enterprise. Bringing sound science, including sound economic analysis, to the EIS process is necessary and will help all stakeholders understand the woeful economics of liquidating the irreplaceable old-growth Tongass forests. We understand the Forest Service’s multiple use mandates, but there is no statutory obligation to meet a demand that doesn’t exist with a supply that cannot be economically offered.

The EIS should also assess the implications of the dwindling industry capacity and sociopolitical landscape referenced in the MOU. Both the public appetite for, and industry ability to execute, an aggressive logging campaign on the Tongass have faded almost completely away. Fortunately, sustainable industries have grown up in the wake of an unsustainable one, and most Alaskans and Americans have long since turned the page and moved on. While the vestigial timber industry and the Alaska Congressional delegation seem to still be looking backward, the EIS needs to ignore the politics and paint an accurate picture of industry capacity for, and public tolerance of, industrial-scale old-growth forest clearcutting.

Along the same lines, the EIS should assess what a comparable investment in development of other industrial sectors using the Tongass National Forest might help accomplish. The formal consultation with industry groups noted above could assist with this effort. The Forest Service has heavily subsidized the timber industry for decades, while other industries have not been viewed as core Forest Service stakeholders, or for other reasons have not received such subsidization. There is tremendous opportunity cost associated with continuing to throw good

money after bad instead of allocating resources with a more clear-eyed view of the dividends that could be reasonably expected to accrue.

Project Need

The January 2018 Project introductory letter list six project needs, which are driven by differences between current and desired forest conditions. Only one need relates directly to timber harvest: “Providing a variety of wood products, including saw timber, in a reliable and economically efficient manner.” We are not aware of any desired forest conditions that would require a commercial-scale old-growth timber harvest component of the project. The EIS should explore whether such a component would be economically efficient, and alternative means of generating wood products.

Until the recent and dramatic decreases in government employment in southeast Alaska (2015-present), the region was prospering in record numbers from about 2008-2015, despite the continued decay of the timber industry during that timeframe. Recent data¹ shows a substantial and resilient if resized public sector; robust growth in the visitor industry; seafood employment and wages still easily the third-largest sector despite encountering several recent sub-par years; and stable if somewhat flat performance in a number of other key industries as well as overall population. It is telling that the timber industry, accounting for less than 1% of regional employment and wages, does not make the list as a key regional industry.

It is difficult to look at that picture and conclude that doubling down on historically uneconomic and destructive large scale old-growth logging would be a sensible and efficient use of scarce public resources. What is the “need” to do that, beyond a desire or tendency to continue a past practice? The available data does not appear to support the stated project need.

The EIS should consider alternative means of generating similar levels of employment and wages in other, more competitive regional industries, while still fulfilling the agency’s multi-use mission. There are a number of important projects included in the proposed action in addition to old-growth timber harvest and perhaps additional investment in these components, coupled with a reduction or elimination of the commercial old-growth logging component, will produce more jobs and other benefits with the same or less taxpayer expense.

Wildlife and Old-Growth Reserves

The EIS must assess impacts to wildlife, habitat quality and connectivity. It must also assess the impacts of road construction and use, road density, and motorized disturbance on wildlife. We look forward to participating in these areas of the analysis.

¹ See Southeast Conference, Southeast Alaska By the Numbers 2017, <http://www.seconference.org/sites/default/files/Southeast%20Alaska%20by%20the%20numbers%202017%20FINAL.pdf>

Also, Defenders has repeatedly attempted to get the Forest Service to follow Forest Plan direction regarding modifying OGRs at the project level in order to comply with minimum requirements for size and composition. In particular, the Wrangell Island project and Prince of Wales LLA project records contained Interdisciplinary Team recommendations for curing deficiencies in the existing OGRs in those project areas. The Forest Plan requires the Forest Service to adopt those recommendations or, at minimum, include an alternative in the EIS that incorporates those recommendations and explain how or why that alternative cannot feasibly be fully adopted. The IDT must assess the OGRs in the project area for adequacy and recommend the preferred means of resizing or reshaping OGRs to comply with Forest Plan requirements. The EIS must incorporate that recommendation into at least one alternative and, if it does not select the preferred OGR designs, explain why not.

Thank you for your consideration of our comments.

Sincerely,

/s/

Patrick Lavin
Senior Alaska Representative
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