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August 26, 2019
Troy Heithecker
Acting Forest Supervisor- Tongass National Forest
648 Mission St.
Ketchikan, AK 99901

RE: Moderate Vulnerability Karst Amendment

The Nature Conservancy (TNC) has participated in multiple collaborative efforts on the Tongass National Forest over the past 15 years, including the Tongass Advisory Committee (TAC). We view the 2016 Tongass Land Management Plan Amendment (TLMP) as a significant achievement for advancing sustainable, improved forest management through compromise and collaboration among stakeholders. The transition to young-growth timber over the next decade is of the utmost importance for both the communities and the timber industry in Southeast Alaska, and for the protection of the remaining primary forest in the Tongass National Forest.

There is general agreement among collaborators from the TAC and its successor, the Tongass Transition Collaborative, that the Moderate Vulnerability Karst language the 2016 TLMP does not reflect the recommendations of the TAC or the goals for the transition to young growth. As a result, TNC supports the proposed Moderate Vulnerability Karst amendment, viewing it as an effective, rapid response to a mistake that will improve the viability of the transition to young growth.

We continue to support measures, consistent with the compromise entailed in the TAC recommendations, that will make the transition to young growth timber on the Tongass National Forest a reality. TNC intends to continue supporting measures that agree with the TAC recommendations, and hopes that the other stakeholders that were part of that agreement – including those from industry – will do the same.

Finally, TNC would like to communicate the fact that the TAC recommendations were a compromise, and that efforts by some stakeholders to undermine that agreement through politically-opportunistic actions (such as support for logging old growth in the 2001 Roadless Areas) could cause TNC to revise its position on projects and plans related to timber harvest in the Tongass in the future. It is our hope that the resource professionals in the Tongass National Forest, Region 10, and the US Forest Service nationally will work to support the spirit of collaboration that was the genesis of the 2016 TLMP Amendment and that has given space for an amendment such as the one proposed in this case, and will avoid bowing to political expediency.

Thank you for your consideration of the enclosed comments.

Sincerely,

A handwritten signature in cursive script, reading "Christine L. Woll". The signature is written in a light gray or blue ink.

Christine Woll
Southeast Program Director