

Thank you for the opportunity to comment on the Central Tongass Draft Environmental Impact Statement (DEIS). The Nature Conservancy (TNC) has been involved in numerous collaborative planning and implementation efforts on the Tongass National Forest over the past 15 years, including the Tongass Advisory Committee, Tongass Collaborative Stewardship Group, Prince of Wales Landscape Assessment Team, the State of Alaska's Citizen's Advisory Council for roadless, and a variety of on-the ground restoration projects (including two involving commercial young growth). This engagement has borne fruit in finding solutions to intractable problems, accessing the knowledge and skills of collaborators from industry, communities, and conservation groups, improving understanding of the resources on the Tongass, and getting work done on the ground.

We believe that, while there are aspects of the Central Tongass Project that are admirable and will have positive results for local communities, we are disappointed by how clearly a focus on large scale old-growth timber sales continues to be prioritized above all other needs. This project reflects a larger trend of looking for unfeasible old-growth timber sales at the expense of other priorities, such as a YG industry, recreation, or fish habitat restoration, which support industries that are far more valuable to the economy and communities of Southeast Alaska than timber. Our comments are intended to make recommendations on how to better address this inequity of priorities.

*In order to have timber sale size, timber supply sustainability, and public understanding of the actual potential for timber development reflect reality, the volume being authorized by the Central Tongass Project should be decreased to an amount commensurate with reality.*

While TNC understands the desire to maximize flexibility for the Central Tongass Project's timber program, the Tongass National Forest's recent history makes the volume numbers in both action Alternatives seem incredibly unrealistic. The DEIS includes the claim that, "During the development and analysis of project alternatives, every reasonable effort is made to make the best estimate of potential economic timber sale harvest volume and acreage" (pg 58). The credibility of this statement is called into question in a subsequent passage, where several failed timber sales are cited as examples of success: "Past projects involving timber sales within the project area that have appraised positive include, but are not limited to, larger sales such as the Tonka Stewardship, Mitkof Heli Stewardship, Frenchie Stewardship Project, Skipping Cow Timber Sale, Wrangell Island Timber Sale, North Kuiu Timber Sale, and various small sales." (DEIS pg. 63) This list of six timber sales includes two export-only sales (Skipping Cow and Frenchie Stewardship), two that have never been offered for sale (Mitkof Heli Stewardship, Wrangell Island), and one that has failed to receive a single bid from three separate offerings (North Kuiu).

Ignoring field inventory evidence, the history of prior sales, and public input that suggests that large-scale old-growth timber sales are simply not a viable part of a long-term vision for timber management on the Tongass creates significant issues. When this project is reported in the media, the volume amounts contained within it are reported, and this in turn shapes public understanding of what is possible. Likewise, when a timber sale in the project area containing 30 MMBF is put up for bid, it is viewed as only a small proportion of the total amount; when in fact, this target is unsustainable long-term, and it is likely that the small mills doing domestic processing in the project area may not have any old-growth timber supply in 15 years. Authorizing an unrealistic volume increases the chance of exhausting all future opportunities.

In the discussion of a transition to young growth, rigorous efforts are being made towards understanding the available young-growth timber volume and accounting for the true cost of removal and processing compared to ultimate revenues. The lack of anything short of absolute certitude surrounding the young-growth resource is at times used as an excuse to not advance the transition. The same level of scrutiny needs to be applied to the old-growth timber resource. Planning needs to reflect actual available, economic volumes of old-growth timber. Any inflation of that value leads to poor planning and is a disservice to the public commenting on projects and driving political policy related to the Tongass.

*The proposed Scenic Integrity Objectives Amendment unacceptably circumvents the hard-fought compromises found in the Tongass Advisory Committee Recommendations and should be removed.*

The Scenic Integrity Objectives (SIOs) are designed to preserve the many values derived from the Tongass's appearance as a wild, natural place. To simply ignore them for the purposes of finding adequate economic timber is inadequate.

Perhaps more importantly, changing SIOs for old-growth timber harvest circumvents the collaborative process that led to the 2016 TLMP, and in doing so devalues collaboration. The 2016 TLMP was the result of difficult compromises between stakeholders on the Tongass Advisory Committee. The end result of that FACA committee – the TAC recommendations – needs to be viewed as a whole, and project-level alterations to the 2016 TLMP should not be pursued lightly. The TAC recommendations do call for relaxing SIOs in the Scenic Viewshed LUD- for young growth. They clearly do not include any language to do the same for old growth, and this was never the intent.

*The Forest Service should begin providing small young-growth sales for domestic processing*

As the DEIS notes, “[r]ecent young-growth contracts with domestic processing have not been fully successful for the purchasers due to a lack of local markets for sawn young-growth.” (66)

While there was *one* young growth timber sale for domestic processing that did indeed fail, there were many factors involved; the Dargon Point/Little Buck experience should not be used as an excuse to never sell another domestic young-growth timber sale, and certainly not to avoid smaller sales. The Nature Conservancy worked with a small mill on a very small-scale project that provided ~36 mbf of 49-year-old young growth for the miller to process and market as he chose; he was able to sell the entirety of the sale locally. While there are many hurdles to a successful young growth industry in Southeast Alaska, one thing is certain: if the Forest Service does not provide opportunities for young-growth processing, there will be no domestic young-growth industry.

The Central Tongass Project should therefore include small-scale young-growth sales, where practicable, for local mills to experiment on. Not doing this misses an opportunity to access the creativity of those already in the milling business. These sales should be designed creatively to minimize risk to the mill; be receptive to multiple potential operators; and generate information that can be used in future efforts. Making money on these initial offerings should not be a part of the equation; the old-growth timber program does not cover its costs with sale revenues, and we should not expect any different from an effort at jump-starting the transition.

*Fish habitat improvement projects should be only completed with proven approaches, in locations needing to restore habitats to previously conditions; and not as mitigation for planned timber harvest.*

The Central Tongass Project contains several alarming plans regarding fish habitat improvements. The project identifies significant portions of 7 watersheds that will be impacted by timber harvest, with estimates on increases to peak flow. As part of mitigation for these impacts, the document proposes natural instream barrier modifications, fish stocking, and lake fertilization. Fish stocking and fertilization have proven to be almost always at best, not effective at improving fish diversity and productivity, and at worst to have cascading ecological negative impacts on wild salmon systems. Instream barrier modification should not be used as a mitigation tool for timber harvest. It is simply more cost effective to reduce timber harvest targets in critical fish watersheds than to try to create new habitat. Efforts on improving fish habitat in areas that have been previously harvested and need restoration should be limited to those with proven track records of improving habitat quality and doing no harm to wild stock populations, such as instream wood placement, culvert replacement, and erosion control.