

**COMMENTS
REBECCA KNIGHT
CENTRAL TONGASS PROJECT DEIS
SEPT. 16, 2019**

Forest Supervisor
Tongass National Forest
648 Mission Street
Federal Building
Ketchikan, AK 99901-6591

Hello Forest Supervisor,

I support the No-Action Alternative for the proposed Central Tongass Project DEIS. In fact, the project should simply be cancelled in view of the substantial impacts of past, current, and reasonably foreseeable logging on the Central Tongass. Some of these impacts have not yet become apparent because of a “succession debt” that is still outstanding from past logging and which will bring continuing loss of winter habitat for deer, upon which my family depends, marten and other wildlife. The Central Tongass local landscapes require a long period of recovery.

However, if you persist with this timber sale, I request that there be no further loss of deer winter habitat in the project area, be it high, moderately high, medium or even low value, due to the concerns I cite below. This is a specific request in response to your comments that the public input during the Petersburg ANILCA Section 810 wasn't specific enough. I find that viewpoint quite odd coming from an agency official who endorses a DEIS with NO site specificity. My family hunts Sitka black-tailed deer throughout the project area. Sitka black-tailed deer comprise about 95% of the red meat in my Petersburg family's diet. Salmon and other seafood make up most of our remaining protein needs.

Make no mistake, the Central Tongass Project continues the agency's singular quest to manage Tongass public lands as a subsidized timber colony and tree plantation for two timber barons—Alcan/ Transpac Group, an international raw log exporter headquartered in Vancouver, B.C., and Viking Lumber of Klawock who also exports vast amounts of timber in the round. It is a final nail in the coffin to decades of cumulative losses of old-growth habitat in this major portion of the Tongass.

While so much about this timber sale is unknown due to the lack of specificity that accompanies your “condition based” analysis, it does not take high intellect to recognize the dire consequences of the CTP action alternatives on subsistence use of old growth dependent Sitka black-tailed deer resulting from removal of 150 MMBF of

old growth timber as well as 80 MMBF of young growth and construction of an additional 118 road miles where 1,200 miles already exist.

I have recycled here, some of my previous comments for the Mitkof Island Project (MIP) since it is just as relevant today as five years ago, when your agency approved, then withdrew its Record of Decision. According to your staff, the units and road configuration employed for the MIP will also be incorporated into the CTP and likely expanded upon for the CTP. Why couldn't you disclose this in the CTP DEIS since that fact was known and much analysis had already been done?

Please include all of my previous comments in the MIP project record into the CTP project record, since they pertain directly to loss of deer habitat and much more. In case you refuse to do that, please refrain from logging in the Woodpecker Area of Mitkof due to it having some of the highest deer habitat value remaining on Mitkof. value of remaining deer habit there. Also included in this request are the following areas on Mitkof: Overlook and the Three Lakes area, Big Creek/Bear Creek (not just the 100 foot buffers but the entire watershed), anywhere in the in Central, Southern, Southwest, Northern, and west side of Mitkof Island as well as the Scott's Peak/Portage Bay and Tonka Mountain area on Kupreanof, Port Houghton/Farragut Bay and Castle River area on Kupreanof, Woewodski and Zarembo Island Because intact areas act as a refugia for Sitka black-tailed deer, and consequently, local subsistence hunters, you must cease planning for timber extraction in these areas. That is another speck request.

The Central Tongass Project DEIS web comment portal was broken for at least two days (9/14/19–9/15/19), resulting in confusion and restriction of the ability to submit comments.

Many public commenters have grown accustomed to use of the web comment portal when submitting Forest Service public comments on projects. Due to the confusion and restriction for comment submission created when this venue is unavailable, this likely resulted in the inability of countless individuals unable to submit comments, including myself. The moose season is upon us, as well as a three day Sunday noon opener for gillnetting. I ended up staying home from gill netting this week, so I could submit comments today. This resulted in financial harm. Why should the public delay those pursuits, in order to submit comments to a federal agency who cannot responsibly maintain a public website? Why isn't staff on duty 24/7 to check the operability of the web portal or some other method available to send an alert for immediate repair when the system is down? I received various calls/emails about this situation. I know of one individual who was preparing for the moose hunt but decided to delay preparations to figure out how to deal with the situation and get his rigorously prepared comments submitted.

While there were a few other methods available to submit comments, such as hand/USPS delivery, and fax, for obvious reasons (like closed Postal Service and Forest Service offices), the ability to comment was quite restricted. Consequently, I request that the agency restart the 45 day comment period. If an agency cannot ensure the

workability of their web comment portal, how can they adequately muster the expertise to plan, analyze, and administer a massive timber sale project?

The Central Tongass Project Condition Based Analysis is insufficient

I find it odd that the Forest Service failed to provide the site specificity required to adequately inform the public of their actions under the CTP, however seeks site specific information from the public on the project's impacts. This ask from the Forest Service was particularly vocalized during the CTP Petersburg public meeting and subsistence hearing. The irony of this request was not lost on me.

The DEIS admits, that "Comprehensive stream, rare and sensitive plant, invasive plant, geology, soil, **landslide**, wetlands, wildlife and cultural surveys have not been conducted within the entirety of the project area, but are ongoing throughout the project planning process". However, these surveys will be done without the scrutiny of a legal NEPA or National Forest Management Act process. The DEIS goes on to acknowledge, "It is likely that additional streams, plant populations, karst features, unsuitable soils, landslides, wetlands, nests, dens and cultural sites may be found prior to implementation in currently un-surveyed areas, though knowledge of these additional occurrences **is not essential for a choice among alternatives.**"¹ [emphasis added]. I disagree again because these will be without the scrutiny of a legal NEPA or National Forest Management Act process.

The failure of DEIS to survey the project area before a decision is made could not be more vital to NEPA informed decision-making and informed public participation.

From the outset, the public is hobbled to understand the impacts of your proposed Central Tongass Project through the use of a "condition based" analysis. This corner-cutting approach violates the gold-standard NEPA and ANILCA required site-specific detail, and provides no way to sufficiently analyze the proposed project's impacts. In the absence of where actual logging or road construction would take place, site-specific impacts to fish and wildlife populations and subsistence uses are unknown. Moreover, the ability to make informed decision-making or informed public participation is impossible through using this analysis method. The Forest Service attempted to use a similar condition based analysis method during the pulp mill era, but this was solidly rejected by the courts. I urge you to re-group and perform the site-specific analysis and disclose the details of your action.

The formal findings contained in the, 2016 Washington Office Activity Review of the Big Thorne and Tonka Timber Sales are directly related to CTP subsistence impacts (and more) of the Central Tongass Project area.

It is highly premature and irresponsible to forge ahead with yet another massive timber sale on heavily fragmented island ecosystems with significant ecological

¹ CTP DEIS at 3-45.

problems in lieu of the formal findings contained in a high level, internal 2016 Forest Service report.² To this day, those findings have not been remedied, as evidenced through formal records requests. This report reviewed the Alaska Region's timber sale and administration processes for two Viking Lumber timber sales and found multiple counts of serious "maladministration" amounting to nearly four million dollars³ in taxpayer losses as well as long lasting ecological damage which is directly related to subsistence use of deer. When timber sale administrators look the other way while allowing the operator to cherrypick the timber in the project area, then previously analyzed subsistence impacts, including cumulative effects, are no longer valid. Figures previously analyzed are incorporated into updated analysis, and are therefore invalid because what actually happened on the ground is far different from what was analyzed.

For more than three years and far more time than it took to issue the Mueller report, the agency has hidden behind several alleged investigations/audits stemming from the report's findings. This amounts to nothing more than kicking the can down the road. All other problems with the CTP aside, the agency must stand down until they can demonstrate that these problems have been adequately corrected.

The Central Tongass Project "Significant possibility of a significant restriction of subsistence use of Sitka black-tailed deer" is unnecessary.

The CTP DEIS subsistence findings acknowledge that,

*"The direct and indirect effects and cumulative effects associated with any of the action alternatives for this project may present a significant possibility of a significant restriction of subsistence use of Sitka black-tailed deer (Odocoileus hemionus sitkensis) (deer) due to potential effects on abundance and distribution, and on competition."*⁴

These restrictions on subsistence use of deer under the CTP action alternatives are unnecessary and absolutely unacceptable because your agency is not required to approve an action alternative, no matter what Senator Murkowski and her timber industry sycophants demand. The environmental risks are too high. How does the political pressure of Senator Murkowski and the 40 or so jobs at Viking, weigh more heavily than the long term, sustainable subsistence use of deer by local residents?

² "Washington Office Activity Review of timber sale administration, sale preparation, stewardship contracting, nepa and timber theft prevention: Region 10". June 12-20, 2016. https://www.peer.org/assets/docs/fs/4_3_17_Timber_Sale_Review.pdf

³ \$2 Million for the Tonka Timber Sale: https://www.peer.org/assets/docs/fs/4_3_17_Post_Harvest_Monitoring.pdf
\$1.7 million for the Big Thorne Timber Sale: https://www.peer.org/assets/docs/fs/4_3_17_Timber_Sale_Review.pdf

⁴ Central Tongass Project DRAFT EIS. 3-333

While so much about this timber sale is unknown due to the lack of specificity that accompanies your “condition based” analysis, it does not take high intellect to recognize the dire consequences of the CTP action alternatives on subsistence use of old growth dependent Sitka black-tailed deer resulting from removal of 150 MMBF of old growth timber as well as 80 MMBF of young growth and construction of an additional 118 road miles where 1,200 miles already exist.

In fact the DEIS—your agency’s own document—contains dire warnings about the consequences to subsistence use deer from implementation of the two action alternatives. These type of warnings are often scrubbed by timber managers from the final cut in timber sale documents, yet somehow they survived.

The DEIS concluded that:

1. *“The theoretical deer density calculated using the deer model is already well below the target [Forest Plan guideline] of 18 deer per square mile in many Wildlife Analysis Areas” and that **more logging would “further reduce it.”***⁵

2. *“Timber harvest would decrease the estimated carrying capacity for deer over the long-term due to reductions in the amount of winter habitat capability. Within WAAs where timber harvest is planned under Alternatives 2 or 3, current deer habitat capability calculated using the deer model [the Forest Service’s own model] on all WAAs except WAAs 5012 and 5018 (both on Kuiu Island) are below the 2016 Forest Plan guideline of 18 deer per square mile, and **suggests the project would result in higher risk that there could be insufficient numbers of deer for sustainable wolf populations and human harvest** [emphasis added] [also Table 58]. This concern exists despite the availability of alternative prey (such as moose and salmon) due in part to the fact that alternative prey may delay a decline in wolf numbers.”*⁶

These are shocking statistics. That is, out of 13 Wildlife Analysis Areas (WAA’s) analyzed *only two* WAA’s on Kuiu Island will have sufficient numbers of deer to maintain wolf populations *and* human harvest due to reductions in habitat capability if either of the Action Alternatives are approved. Moreover, the smaller the piece of pie to harvest deer, the more concentrated hunters become in the remaining areas where deer are more abundant, competition increases, and/or they stop hunting altogether, particularly when they do not have the means to travel to other areas.⁷ Because they have stopped hunting does not mean the demand has been

⁵ Central Tongass Project DRAFT EIS. 3-149

⁶ Central Tongass Project DRAFT EIS. 1-141

⁷ Impacts of Clearcut Logging on the Fish and Wildlife Resources of Southeast Alaska
Editor: Marilyn J. Sigman Technical Report 85-3 http://www.adfg.alaska.gov/static/home/library/pdfs/habitat/85_03.pdf

reduced. Also, there are plenty of hunters on the grounds with designated deer harvest permits in their back pocket, which often go unused. Demand for deer is high.

I am also concerned about the liberalization of hunting in GMU 3. I understand you have no control over that, however the impacts of the liberalized season should be considered in your calculations. Given the level of habitat degradation and the access to deer populations by an extensive road system, near a population center, it is likely that the deer population will plummet after the first liberalized season. This is especially so in combination with a hard winter. I request that there be no further reductions in habitat capability in those WAA's where concern exists for the sustainability of human harvest. My family's ability to successfully harvest deer would be directly threatened by Action Alternative 2 or 3.

3. *"In WAAs which have experienced long-lasting declines in the deer population in the past, such as WAA 2007 (Mitkof) and WAA 5138 (Tonka), high and moderately high value deer winter habitat would also be further reduced. In WAA 2007, the percentage remaining (from historic) would go from 70 percent currently remaining to 62 percent under Alternative 2. In WAA 5138, the percentage remaining would go from 71 percent currently remaining to 63 percent under Alternative 2.*

These declines are very concerning to me and my family who harvest deer in each of these WAA's. Specifically, please remove these WAA's from the timber sale planning area.

4. *"Though there are no known thresholds for the amount of deer winter habitat required, reductions in this important deer winter habitat (high and moderately high value deer winter habitat) **increase the risk of severe winters in not sustaining a healthy deer population in the long term, and may result in periodic declines from infrequent severe winters.**"*⁸[emphasis added]

5. *"High and moderately high value deer winter habitat would be most reduced by Alternative 2 in WAA 5136 (Portage Bay). **Under Alternative 2 there would be a 35 percent reduction from the existing condition in this WAA, resulting in 49 percent of this habitat remaining compared to the historic (1954) condition in this WAA. Based on professional opinion, a removal of 35 percent of the existing amount of high and moderately high deer winter habitat in any particular WAA would be a substantial change in a WAA's ability to sustain a healthy deer population through a severe winter. The high and moderately high value deer winter habitat remaining from the historic condition would also reach 49 percent in WAA 5132 (West Kupreanof) under Alternative 2.**"*⁹ [emphasis added]

⁸ Central Tongass Project DRAFT EIS 3 - 76

⁹ Central Tongass Project DRAFT EIS. 3-76.

A look at Table 36 reveals three WAA's where habit capability is dramatically impacted:

-WAA 5136 (Portage Bay): the deer habitat capability as determined by the deer model would be reduced by 18.6 percent from the existing condition at stem exclusion (estimated at Year 2045) under Alternative 2 and 14.1 percent under Alternative 3

-WAA 1905 (Zarembo): the deer habitat capability as determined by the deer model would be reduced by 14.8 percent from the existing condition at stem exclusion (estimated at Year 2045) under Alternative 2 and 12.2 percent under Alternative 3

-WAA 2007 (Mitkof): the deer habitat capability as determined by the deer model would be reduced by 11.5 percent from the existing condition at stem exclusion (estimated at Year 2045) under Alternative 2 and 9.6 percent under Alternative 3

Again, these declines, acknowledged by your own experts, are shocking and very concerning to me and my family who hunt and harvest deer in each of these areas. Please stand down for any further entry into these areas for logging.

The DEIS justifies this project and thus this significant possibility of a significant subsistence restriction on harvest of deer by alleging that,

*“Commercial old-growth harvest is part of the purpose and need because the Tongass National Forest managers are obligated to seek to meet demand for timber from the forest to comply with the Tongass Timber Reform Act (TTRA Section 101).”*¹⁰

All other issues aside, you consistently fail to disclose in your timber sale planning documents the rest of the TTRA “seek to meet demand” text. Specifically, seeking to meet market demand also means that in doing so it,

*“**must** be to the extent consistent with providing for the multiple use and **sustained yield** of all renewable forest resources.”*¹¹ [emphasis added]

This includes subsistence resources like Sitka black-tailed deer, for which your document admits that sustainable harvest of deer in much of the planning area is at direct threat. When an agency publicly acknowledges that, “based on professional opinion, a removal of 35 percent of the existing amount of high and moderately high deer winter habitat in any particular WAA would be a substantial change in a WAA’s ability to sustain a healthy deer population through a severe winter,” and that “the project would result in higher risk that there could be insufficient numbers of deer for sustainable wolf populations and human harvest” that we ALL need to be greatly and your agency must abandon the CTP.

¹⁰ Central Tongass Project DRAFT EIS. 2 - 26.

¹¹ Tongass Timber Reform Act. Section 101.

The Central Tongass Project Raises Grave Concerns Especially in Combination with Past, Present, and Reasonably Foreseeable Local Impacts.

If approved, the Central Tongass Project would provide two timber barons with nearly **a quarter billion board feet** of primarily old-growth and some second-growth timber, on up to 13,500 acres of logging units, to be cut over the next 15 years. This devastation would occur on Mitkof, Kupreanof, Kuiu, Wrangell, Zarembo and Etolin Islands and the adjacent mainland. The forest landscape in this part of the Tongass is already heavily fragmented, both naturally and from decades of industrial scale logging. In an attempt to sell this travesty to the public, the Forest Service has packaged this destructive activity with a minor amount of largely unfunded recreation improvements and watershed restoration—and have innocuously labeled it a "project" instead of a "timber sale project." It is notable that the public did not buy this scam, judging from the extensive public comments received so far. Every one of the comments ai have read so far, jugged the CTP as a timber sale-not a recreation/ restoration project.

Also of concern is the high probability that if a federal timber offering is made on Mitkof Island, the State of Alaska, will also offer their extensive SE State Forest holdings for liquidation at the same time. What communications have you engaged in with the State Forester or others regarding this possibility on Mitkof as well as in other parts of the project area? Please disclose and consider the impacts to local communities if such an event occurred. There would be much greater devastation than disclosed in a Mitkof FS timber sale analysis. Your cumulative effects analysis should include the effects of logging non-federal land holdings on Mitkof Island as well as in other CTP project area's so that the public has a clear picture of the real impacts and over time. This includes the State of Alaska, University, Alaska Mental Health Trust, and native forested land holdings. Those acreages should be included in cumulative impacts analysis.

The Interconnectivity of Local Deer, Wolves, Subsistence Uses and Habitat Loss

The bottom line is that Mitkof and Kupreanof Islands and the greater Central Tongass community use area has been under severe stress for subsistence use of deer as well as other resources. Road construction and clearcuts have highly fragmented the landscape and important deer winter range has vanished.

Although deer abundance has slightly rebounded in recent years from a spiraling downward trend due to a few mild winters, the impact on deer abundance from potential heavy snow winters cannot be ignored. For instance, the heavy snow winter of 2006-2007 resulted in widespread deer mortality. Heavy snow winters are certain to reoccur and reducing any more deer winter range is unconscionable.

In cases where habitat capability is below the 18 deer/mi.sq² TLMP threshold, your agency shields itself behind the "where possible" clause to sanction yet more logging and roading rather than adopting a "no further harm" philosophy. This is unethical.

There has been a lot of talk about eating locally these days – even on Mitkof Island where a “community garden” has been established and local residents are growing more of their own food. A community garden is however more than just carrots and peas; it is also a functioning ecosystem where all our complete nutritional needs can be met. Mitkof Island and our local area used to be just that-a Garden of Eden. It supplied the protein needs of most of the island’s residents along with seafood resources. Those days are long gone thanks to industrial scale logging that began about six decades ago. Following decimation of high value deer winter range locally, a 17-year deer hunting closer was instituted, and deer numbers are still struggling. With the price of domestic protein skyrocketing due to the effects of drought induced climate change, our local community garden that includes Mitkof’s and the Central Tongass’ old growth forest will become increasingly important. Simply because the island’s habitat capability has been reduced to rock bottom, does not mean it should be exploited further as a sacrifice zone.

With the best habitat gone and now with canopy closure occurring 25-40 years after logging, depending on location, what is occurring is a continual “succession debt” on the habitat. Following canopy closure, a virtual forage desert predominates, and now in the later decades, year-by-year the debt is being paid at a high price in terms of the amount of deer available to both hunters, and wolves. Proposed restoration activities such as thinning, fail to protect the resource on a meaningful scale, nor will their effects be sustained long-term.

The logical and educated course of action would be to immediately halt this planning process. Predictably however, the FS will remove a few token deer winter range acres they would have otherwise cut and label that “mitigation”. This is not mitigation – it is unabashed spin. Your agency will then rationalize that exacerbating the problem is “consistent” with the sound management of public lands and that it must be *necessarily* borne by local subsistence users. The public is not assuaged.

I challenge that notion for a variety of reasons, especially since the bulk of the volume will be sold to a timber operators who export most of our natural wealth in the round. It is indeed a third world mentality when China and Viking’s mill owner relatives in Washington State reap the benefits while local subsistence users must cease hunting altogether or risk life and limb to travel to distant areas to fulfill their subsistence needs. Local venison comprises the majority of the red meat in my family’s diet as it does for many of my friends and neighbors. I worry every year when my husband and sons travel to Admiralty to harvest deer and are often delayed due to weather. As has been cited in previous comments, others have died or nearly so, making the same trip. And this is not to mention the expense that traveling to distant locations entail. They should be able to meet their subsistence needs closer to home, but logging of important deer winter range continues to knock back deer populations so hunters must travel farther and at great expense during late Fall heavy seas to meet their subsistence needs.

The Forest Service must take reasonable steps to ensure not just viable, but

harvestable levels of wildlife populations, in particular - deer. Now that much of the high value deer winter range has been clearcut, what little habitat remains is vitally important including **all** deer habitat (low, mediocre, high and highest value winter range) as well as leave strips that serve as important elevational corridors for wildlife. The corridors must be identified and retained in perpetuity, FOR ALL ACTION ALTERNATIVES, otherwise they are nothing more than temporary mitigation to foster the appearance of doing the right thing. In reality, these leave strips are seldom “left” but rather absorbed into new clearcuts after only a few years resulting in “creeping mega-cuts” that are wastelands for wildlife. I request that no CTP deer habitat be logged including current leave strips between previous cutting units for the CTP. That is a specific request.

In reality, the CTP is nothing more than “death by a thousand cuts.” It a poster child example for why NEPA emphasized that cumulative impacts of proposed actions be site-specific analyzed, not just grossly estimated and based on faulty data.

Moreover, it is incorrect to assume that there is a linear, one-to-one relationship between the incremental of loss in deer habitat capability and the number of deer that will be available to hunters. As Dr. Dave Person has pointed out many times, although the deer model assumes the system is linear, in reality the system is not -- especially when predation is involved. The more the forest becomes fragmented, the more many of the remaining winter habitat patches become exponentially less effective. This non-linearity is due to isolation of some patches at that time of year, or a higher energy expenditure by deer to get to them and in some cases to use them; or the increased ability of bear (which prey heavily on fawns) and wolves to hunt them due to the fewer deer corridors between remaining forest stands and the fewer patches of winter habitat. This does not even take into consideration that the overall amount of winter habitat has already been greatly reduced. The deer model does not take these things into account nor does the agency’s excuse. Also, the model does not take predation into account, which is a significant factor now.

I cite just below an excerpt of a 2010 “Ball in the Box” presentation by Dr. Dave Person to the Alaska Board of Game (“Wolves in Southeast Alaska”).¹² Dr. Person is a former Alaska Department of Fish and Game (ADFG) biologist with over 22 years of experience studying endemic Alexander Archipelago wolves on Prince of Wales Island. He is the world’s foremost authority on the AA wolf. The presentation provides a layman’s concept of the predator/prey dynamics at work here, and why we consider habitat to be such an important thing:

**Presentation to the
Board of Game on Nov. 5, 2010 (“Wolves in Southeast Alaska”)
2010 Ball in the Box Presentation by Dr. Dave Person**

¹² “Wolves in Southeast Alaska” delivered by former Alaska Department of Fish & Game wolf & deer researcher Dr. David Person, at the Alaska Board of Game’s November 2010 meeting in Ketchikan. It is even more poignant now than it was then. <https://alaskarainforest.org/media>

(last two slides of presentation)

(“Ball in the Box” model, first slide).

“OK. I just want to end my discussion with giving you a concept of the predator/prey dynamics that are here, and why we consider habitat to be such an important thing. I call this my ‘ball in the box model.’ If you think of the carrying capacity for deer and all the things that support deer at being this box, a three-dimensional box. And that ball in the center represents the populations and the dynamics of all the constituent players – the wolves, the people, the bears, and the deer – and what it’s going to do in space and time. And if you take that box – and that’s the space it all has to work in, it all has to be functioning in and moving about in – that ball is never at rest. There’s no balance of nature. There is no balance of nature. Nature is always being perturbed by something. Something is changing – a bad winter, an overharvest of deer, a super abundance of wolves for some reason, disease – something is always perturbing. Logging, is always perturbing it. And that ball is always moving.

But when carrying capacity is very large, that ball has a lot of room to move, without hitting a side and bouncing and perhaps collapsing the system, or finding some tremendous series or years of instability. So when K [carrying capacity] is big, it doesn’t necessarily mean that things are bottom-up, or top-down, but it provides the resiliency necessary for that system to function despite a lot of disturbance.”

(“Ball in the Box” model, second slide).

“When you reduce K , which is what is happening because of timber harvesting in those areas in which harvest is extensive, you’re taking that box and you’re making it smaller. So now the activity of the dynamics of that ecological system is more likely to hit its barriers. And when it hits its barriers, its behavior may become erratic. There may be periods of time in which you have long-term suppression of deer numbers by predation, for example. You may have periods of time when one or more of those species drops out. You may have periods of time in which you have wild swings, and instability in that system. And so any perturbation to this system, any disturbance – there’s less resilience in the system to deal with it. And that’s what we are trying to avoid here, for the long-term. We don’t want to become a Vancouver Island, which is a train wreck – an islands that’s five-times the area of Prince of Wales, for example, but only seems able to support less than 50,000 deer. Prince of Wales Island has 60-70,000 deer. They claim they can only support sustainably perhaps 100 wolves, and we have perhaps as many as 250 to 300 on Prince of Wales Island. And so we don’t want to see that happen, because that’s a train wreck that everybody loses. And that’s why our focus has been primarily on these predator/prey issues that relate to habitat change.”

The modeled deer carrying capacity of the WAA 2007 (Mitkof Island) is so far below the Standards & Guidelines, that subsistence hunter effort and take, no longer reflect

subsistence hunter demand. The 10%/20% assumption may be applicable in an ecosystem that has a carrying capacity at or above 18 deer/sq-mile, but that is not the situation on Mitkof. Hunters have already been displaced, severely, and the effort for even a small harvest has become extreme. This in itself is an indicator that the linearity of the deer model (as representative of a non-linear ecosystem) is a problem when evaluating projects on Mitkof Island, because it leads to a huge under-estimate of all types of impacts -- direct, indirect and cumulative.

Further it is inappropriate to conclude such a restriction must be necessarily borne by local subsistence users. They must go elsewhere. Not only is this just plain wrong – it is unfair. The intent of ANILCA, which is why we are all here tonight, was to ensure that federal agencies maintain populations that are not just viable but are also huntable and in local areas.

Your analysis needs to show that no matter which calculation method is used for determining deer carrying capacity, the TLMP standard and guideline of providing 18deer/sq-mi cannot be met, even in the current condition and will obviously be reduced by action alternatives in the midst of a serious decline in deer harvest from this and nearby WAA's.

~End Dr. Person's Presentation~

The 2002 Woodpecker Timber Sale EIS Record of Decision (at 14) recognized the importance of the Woodpecker area to local deer hunters.

"Issue 1: Deer Hunting

*This issue centers around the popularity of the Woodpecker Project Area for deer hunting by the residents of Mitkof Island, and the concern that any timber harvest on the island will affect deer populations. Mitkof Island has traditionally been used by residents of Petersburg for subsistence deer hunting. The Woodpecker Project Area is the most heavily used part of Mitkof Island for deer hunting, due to the accessibility provided by the road system that connects to Petersburg, and **the higher numbers of deer inhabiting the area**. The number of deer is higher in the Woodpecker Project Area because of good forage and less snow accumulation found on the southfacing slopes near saltwater."* [emphasis added].

The Mitkof portion of the CTP analysis must incorporate this recognition when deciding the level of deer winter range to be made available to Viking & Alcan/ Transpac Group at the expense and consequent displacement of local deer hunters to remote locations that are risky to access. Please, no more logging in the Woodpecker area. That is a specific request.

The Section 810 and NEPA analysis – not report - must consider and disclose this recent evidence of population declines. A “subsistence report” is clearly not a

substitute for the Section 810 evaluation, so please do not shortstop the required evaluation.

Risk of Landslides/Windthrow

It is disappointing that there was only general mention of landslide/windthrow risk in the DEIS since there is a long history of repeated landslides and/or debris avalanches in the CTP project area and windthrow, including on Mitkof Island. This includes loss of life, massive property damage, and serious impacts to aquatic habitat as well as impacts to spawning habitat of several species of salmonid and trout including prized steelhead habitat. These areas need to be identified in the DEIS.

Despite historic assurances in various public documents that uncut buffers are windfirm, there has been significant wind throw in the CTP project area resulting in unacceptable impacts as acknowledged in the DEIS:

*“Within the project area, a total of 100 windfirm buffers have been monitored, with 73 of those occurring on Petersburg Ranger District. **Post-harvest windthrow is present in 58 percent of all buffers,** with 34 percent of that windthrow falling into a stream, yielding an 8 percent average windthrow mortality (USDA Forest Service, 2016-2017 Tongass National Forest Monitoring and Evaluation Report, unpublished data).” [emphasis added]*

Given this acknowledged level of windthrow, there can be NO expectation that any buffer is indeed windfirm, but rather a level of risk amounting to a simple throw of the dice. This applies to any locale within the CTP project area

The October 7, 2013 MIP scoping comments of the Greater Southeast Alaska Conservation Community, GSACC et al, (now Alaska Rainforest Defenders) substantiate a history of Mitkof landslide activity and specifically noted geographic areas of concern regarding impacts to aquatic resources.¹³ Clearly your agency is aware of landslide risk on Mitkof and should have acknowledged that specific risk in the DEIS. In the interest of brevity, I incorporate here, by direct reference, those comments and request that landslide risk and its impacts to aquatic resources, including subsistence uses be specifically evaluated.

The Big Creek Subsistence Area is a federally designated **subsistence stream** requiring a permit for federally qualified users. Please acknowledge this status and demonstrate that your analysis considered the federally recognized status of this stream in development of alternatives. It should be acknowledged that Big Creek supports steelhead and has been seriously damaged by debris avalanches caused by past timber sales activities.

Fisheries Concerns

¹³ Greater Southeast Alaska Conservation Community et al (GSACC or “Gee-sak”) Mitkof Island Project Scoping Comments. October 7, 2013. P. 37-40.

Terrestrial impacts of logging on salmon populations are of great concern to my family, friends, and community and particularly during a time when our planet is warming and salmon abundance is spiraling downward in the Pacific, including in the waters of SE Alaska. Our livelihoods depend on harvesting sustainable populations of salmon. Thank you for acknowledging in the DEIS some of the science/regulation of logging impacts on stream temperature. It is a big warning bell to all:

“The Alaska Water Quality Standards for “growth and propagation of fish...” are “may not exceed 20 degrees C at any time” and are specifically 15 degrees for migration and rearing areas, and 13 degrees for spawning areas and egg and fry incubation. For all other water, the weekly average temperature may not exceed site-specific requirements needed to preserve normal species diversity or to prevent appearance of nuisance organisms (ADEC 2018a).¹⁴

*“Previous correspondence with USGS personnel indicated the 20-degree standard **is exceeded most years** on approximately half of the non-glacial streams in southeast Alaska (Solin pers. comm. 2009).”¹⁵[emphasis added]*

High SE Alaska temperatures during this past summer are likely responsible for reported fish die-offs in/near local waters. I heard of a particularly large salmon mortality event at Castle River about a month and a half ago, likely caused by high stream temperatures. Are you aware of this mortality event or any others within the CTP project area during the 2019 summer? Did you conduct any stream temperature surveys during this summer in the CTP project area? If so, please disclose in the DEIS all reported and/or documented fish mortality as well as the results of any stream temperature surveys in water bodies in the project area, by site specific name as well as the level of watershed impacts.

As a frequent witness to massive cutover watersheds, I cannot help but wonder what impacts to salmon abundance from temperature exceedances are being experienced downslope. The following provides a clue:

“Timber harvest in upland areas has also been linked to increases in maximum daily stream temperatures. Pollock et al. (2009) observed that watersheds in the western Olympic Peninsula with 25 to 100 percent of the total area harvested had higher stream temperatures than those with little or no harvest.”

“Current 30-year cumulative harvest levels in project area watersheds are below those identified in the above study, although many would

¹⁴ Central Tongass Project DRAFT EIS Environment and Effects – Chapter 3 ■ 165

¹⁵ *Id.*

increase above 25 percent with both action alternatives as discussed in the cumulative effects analysis below.”¹⁶

It makes no sense to continue the insanity of fouling our own nest— and waters— with huge timber offerings to benefit an economically unimportant industry like Viking Lumber and Alcan, and at the expense of every other use and user of these lands. They care not about the consequences of their actions—only the bottom line—all the while cutting down our great forests as fast as they can, to be shipped to China in the round. This is NOT outside the scope of this project; it could be no more relevant.

Any further diminishment of already weak scenic quality standards is unacceptable.

In order to make the CTP timber sale more profitable for industry, the Forest Service proposes to “relax” (in truth debilitate) scenic quality standards via a Forest Plan Amendment. First, the industry has enjoyed decades of propping up to make timber sales more profitable, at a significant loss to the US taxpayer.¹⁷ These losses continue a decades-long drain on the public’s financial resources; from 1982-2012 the Forest Service spent \$1,193,521,560 more to log the Tongass than it received in timber revenues.¹⁸ Despite these massive public subsidies, the timber industry consistently contributes less than one percent in total employment earnings for Southeast Alaska.¹⁹ It is inconceivable that you would consider relaxing Scenic Quality Objectives to further subsidize this welfare industry! When will the timber industry stand on its own two feet, and cease demands for more and more “economic timber”?

¹⁶ *Id.*

¹⁷ 1 U.S. Government Accountability Office, Tongass National Forest, Forest Service’s Actions Related to Its Planned Timber Program Transition at 7 (2016); see also Taxpayers for Common Sense, Money Losing Timber Sales: Tongass National Forest at 1 (Mar. 2015) (“From 2008 through 2013, the Forest Service spent \$139.1 million on timber sales (including road construction) in the Tongass and received \$8.6 million in proceeds from these sales, a net loss of \$130.5 million.”); U.S. Forest Service, State of the Tongass National Forest (FY 2009 – 2013); Headwaters Economics, The Tongass National Forest and the Transition Framework: A New Path Forward? at 2-5 (Nov. 2014).

¹⁸ J. Mehrkens, Former Forest Service R-10 Regional Economist. Scoping Comments for Proposed TLMP Amendment at 2 (June 19, 2014).

¹⁹ See Southeast Conference, Southeast Alaska by the Numbers 2017 at 4 (Sept. 2017); Southeast Conference, Southeast Alaska by the Numbers 2016 at 3 (Sept. 2016); Southeast Conference, Southeast Alaska by the Numbers 2015 at 4 (Sept. 2015); Southeast Conference, Southeast Alaska by the Numbers 2014 at 4 (Sept. 2014); Southeast Conference, Southeast Alaska by the Numbers 2013 at 4 (Sept. 2013); see also Southeast Conference, The Arts Economy of Southeast Alaska at 1 (Sept. 2014) (“[i]n terms of workforce earnings, the arts sector is nearly twice the size of the regional timber industry”).

All of the proposed locales where scenic standards would be relaxed are high use recreation areas and/or are highly visible from routes used by independent travelers, ferries, eco-tour boats, and cruise ships. In fact, the Inside Passage is a world recognized “Scenic Byway”. The effects of this substantial corner-cutting upon the vistas and natural wealth of the project area's world-famous Scenic By-Ways and world-class recreation areas will be long lasting and cause disproportionate harm. Please tell the Forest Service to abandon this ill conceived plan to further subsidize the timber industry with this inexcusable sacrifice.



The proposed Central Tongass Project, together with the recently approved Prince of Wales Landscape Level Assessment, are massive old growth timber sales which demonstrate that the Forest Service is not honoring its commitment to a transition away from old growth logging.

In 2010 the Forest Service announced a transition away from logging old growth on the Tongass—the last forest in the nation to continue this antiquated and appalling practice. Despite a Forest Plan Amendment to that end, there is clearly no sign that this commitment is being upheld. The time to end Old Growth logging is now. Please end it.

The Forest Service must implement a *funded* and comprehensive program to repair fish passage blockages along the 1,200 miles of existing road in the project area with an emphasis on repair or removal of barrier culverts and/or road decommissioning.

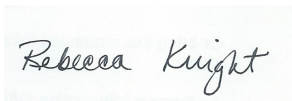
The project area currently contains 452 “red crossings” (blocked culverts or other blockages along the logging road system which impede fish movement). Instead of constructing additional, expensive logging roads which are difficult to maintain and ultimately create new blockages, a comprehensive road repair and decommissioning program must be implemented and forward-funded before another mile of road is constructed. Salmon need every advantage they can get for reproduction and early survival, especially when Pacific salmon marine survival is in a severe downward spiral.

The DEIS fails to adequately address the impact of climate change in relation to the CTP.

Lastly, and most importantly, the CTP makes no sense during a time when the impacts of climate change have already reached a level of extreme danger in Southeast and around the world. Changes, being triggered now, will be irreversible at least for many human generations if not far longer, and we and earth's species face an existential threat. The Tongass sequesters more carbon than any other forest in the nation, public or private. It should be allowed to do what it does naturally and at no charge when left standing. The Forest Service gave only lip service to this important issue in its CTP "analysis".

For the above reasons and many more, the Tongass National Forest should choose the Central Tongass Project's No Action Alternative. Too much is at stake to risk the huge impacts of yet another massive timber sale on the Tongass.

Thank you,

A handwritten signature in cursive script that reads "Rebecca Knight". The ink is dark and the handwriting is fluid.

Rebecca Knight

Exhibit A. Testimony of Rebecca Knight for the Public Meeting/Hearing Regarding the Special Action Request to Restrict the Federal Subsistence Deer Season and Harvest Limit on the Lindenberg Peninsula in Game Management Unit 3. 7/1/13. This document is in your Mitkof Island Project Record.

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