Data Submitted (UTC 11): 11/8/2019 9:00:00 AM
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see attached comment letter

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USDA Forest Service

Attn: Alaska Roadless Rule

P.O. Box 21628

Juneau, Alaska, 99802

We are writing to express our view that Alternative 6 is not the best approach to "meaningfully address local economic and development concerns and roadless area conservation needs" (DEIS, p. 38). We have been directly involved for several years in efforts aimed at resolving the very issues raised by the State of Alaska in their petition. The mutual goal of a long-term, durable approach is laudable. Your current proposal is not. In fact, Alternative 1 (No Action) best meets this goal. The Roadless Conservation Rule has been adjudicated often, and specifically for Tongass National Forest, to finally represent a fundamentally fair and legally valid long-term, durable solution. Further, your agency has exercised the discretion granted in the Rule to accommodate more than 50 requests for exemption, each granted within a month from original request submittal date.

A fundamental goal is to manage Tongass timber resources so as to conserve its prodigious, world-class temperate rainforest and all the values that flow therefrom, while providing meaningful certainty and stability for local timber industry. Addressing this goal is our primary concern. Our premise is that this is easily achieved under Alternative 1, and requires no change to the status of the Tongass 9.2 million acre roadless area landscape.

While you must consider the State's petition, you are not required to agree with their request. We suggest that you respond by choosing Alternative 1.

At the heart of the concern for the future of Alaska's timber industry is the current state of the industry and the forest landscape itself. Much has been written of the long-term decline of the industry, the reasons for the decline, and the prognosis. We acknowledge this history and the role the Forest Service has played in creating

the current reality, but will not add anything new here. Distance from markets, legal liabilities associated with clearcutting old-growth forests, negative effects on other important Alaska assets (such as fisheries), below-cost timber sale and export restrictions, high defect rates in old growth timber, long-term subsidies, lack of value-added manufacturing and archaic industry milling facilities are among the factors that affect the issue. A transition to reliance on young growth supply, increasing value-added product manufacturing, and adroit management can deal with such factors to improve future industry prospects while conserving roadless values. Your proposed Alternative 6 is unnecessary and, far from meaningfully addressing the current situation, will make matters worse by increasing risk and uncertainty.

Why is your proposal unnecessary? Briefly, your 2016 Tongass Land Management Plan (TLMP) and the March 2019 Prince of Wales Landscape Level Analysis (POWLLA) provide assurances of timber sale levels that far exceed industry needs for the foreseeable future. While the DEIS acknowledges the existence of POWLLA, it makes no mention of the plan to harvest 200 mmbf of old growth, plus 271 mmbf of young growth outside roadless areas in next decade. After more than two years of community partnership and local stakeholder input with the FS (all done while assuming the 2001 roadless rule remained in effect), the DEIS now states that the entire POWLLA would be scrapped with any changes to the Roadless Rule: "The Prince of Wales Landscape Level Assessment was conducted and remains in line with the 2001 Roadless Rule. Any changes to the Roadless Rule would necessitate a review of the POWLLA by the responsible official and a change analysis presented to the public". The 2016 TLMP provides 46 mmbf/yr of old growth and young growth volume, trending toward primarily young growth by about 2030. The POWLLA shows a completed transition to young growth harvesting at 50 mmbf/yr in seven years (starting 2027), and a diminishing old growth volume limit of 15 mmbf/yr starting 2027 dropping to a sustained long-term annual OG volume limit of 5 mmbf/yr starting 2032. Timber harvest has averaged about 36 mmbf/yr for the past 10 years (DEIS Table 3.2-3, p. 106), and recent unprocessed exports account for nearly half that total (DEIS Table 3.2-6, p. 109). Thus, if projected supply more than meets agreed to sale levels, why is it necessary to eliminate protections against commercial timber sales and new roads on all 9.2 million acres of roadless lands only to gain access to an additional 130,000 acres of old growth, when 260,000 acres of old growth are already available to satisfy industry demand (see DEIS Table 2-9, p.65)?

Your explanation strains credulity: "Although no additional harvest would take place, the expansion of suitable areas means that greater area is available for the development of sales, allowing more choices for the development of economic ones " (DEIS, p. 230). This logic is severely flawed. Current conditions offer a sober truth - old growth harvest proposals encounter two major problems: 1) potential harvest acres decline dramatically (about 70 percent) when on-the-ground inventory is done, resulting in unplanned-for "downfall"; and 2) old growth defect averages 50-70 percent on the Tongass. You hope to add about 160,000 acres of old growth by eliminating roadless area protections, but the aforementioned downfall will likely yield less than 50,000 useful acres. Coupled with defect issues, we estimate the reduced yields per acre to net only 3.5 mmbf/yr; substantially less than what is currently achievable from roaded young growth stands at much less cost. In addition, the high risk of litigation losses over clearcutting old growth in former roadless lands is a major hurdle to contemplate. This lays bare your motivation for "more flexibility".

It is astounding that an agency that aspires to conservation leadership would consider trading the crown jewels of the premiere temperate rainforest on Earth for "30 shekels of silver". The symbolism of the Forest Service giving away 9.2 million acres of hard fought protections for a few million board feet of environmentally and financially costly old growth forest defies reason.

As we two authors have repeatedly sought to explain to the Forest Service, there is a better way forward. Your own intensive young growth inventory conducted between 2016-2018 shows 50-70 year old stands outperforming mbf/ac volumes listed for prior and planned for old growth timber sales. Further, your inventory results even show stands aged 40-50 years in the Prince of Wales region (where the bulk of young growth is on the Tongass) are already achieving mbf/ac volumes equal to old growth, indicating that a sustainable supply of

young growth is already available for harvest, and this will increase in future decades. Specifically, based on GIS analysis work conducted by GEOS/NRDC in 2015 on the Tongass (using Forest Service data), over 130,000 young growth acres of suitable (after eliminating all environmentally sensitive acres), roaded (within 800' of a currently open Forest Service road) forests are available. You have had this information since 2016 but do not include this analysis in the DEIS.

Even more troubling is the appearance that you have eliminated information from the record that negates your argument. Concurrent with the development of POWLLA, the Research Station in Juneau and Portland, Oregon received $600,000 to engage in a peer-reviewed and approved young growth wood quality study design. Research statisticians selected 9 study sites that would statistically reflect the larger young growth landscape on POW (called "scope of inference" sites): 2 at Maybeso, 2 at Naukiti, 1 at Heceta, 2 at Twelve Mile, 1 at Coffman Cove, and 1 at Winter Harbor. Region 10 and Tongass staff were apprised of these site selections in early 2017. By mid-2018, the Research Station concluded their intensive in-field inventory work on the selected scope of inference POW sites, resulting in the following -- both Maybeso sites (55-59 yrs old) were inventoried at 40 mbf/ac; both Naukiti sites (60-64 yrs) were inventoried at 44-49 mbf/ac; Heceta (45-49 yrs) was inventoried at 30 mbf/ac; and Winter Harbor at 37 mbf/ac (60-64 yrs). Merchantable volumes for these selected sites all surpassed past and future old growth sale volumes. In contrast, both Twelve Mile sites (50-54 yrs) inventoried at 11-18 mbf/ac, and Coffman Cove (45-49 years) at 14 mbf/ac. These inventory results were made available to both the Region and Tongass NF. The 2016-2018 young growth inventory work completed by the Forest Service included only Twelve Mile and Coffman Cove sites but notably (and inexplicably) excluded the known high-production scope of inference young growth acres. Yet, even with this rather obvious omission, the 2016-2018 inventory results prove favorable for young growth acres.

We exported and analyzed the FS 2016-2018 young growth inventory data originally downloaded into its public Tongass Portal:
(https://www.arcgis.com/apps/MapJournal/index.html?appid=e748ce92139c4100a65ad8b12510d620#) Results underscored high mbf/ac merchantable volume performance in young growth stands equivalent to or better than past and planned old growth timber sales, particularly in the Prince of Wales region - even without the scope of inference sites referenced above. This information was released to the Region and the public in August 2019. But prior to the October 2019 DEIS release, the FS deleted all young growth age-class data originally downloaded to their public portal, thus making it impossible for the public to correlate merchantable mbf/ac matched to young growth age class area. Why was this done?

You have chosen a terribly difficult way forward. Based on past adjudicated cases, Alternative 6 virtually guarantees litigation that the agency will likely lose -- at great cost, no less - furthering the folly of sunk costs. The devotion to clearcutting old growth in dedicated roadless areas doubles down on a risky, uncertain 10-year bridge to your avowed transition to primarily young growth timber supply. Forest Service timber supply is but one of many headwinds faced by Alaska's troubled timber industry. Even though ample young growth is accessible right now to meet demand, you have chosen to delay the transition for several more years. And now you are proposing to eliminate protections on 9.2 million acres of Earth's premiere temperate rainforest to manufacture "flexibility" in finding a few million board feet of old growth to clearcut to supply a highly subsidized timber industry.

We support No Action. Don't give the State of Alaska what they want. Rather, give them what they need: 1) a sound, sensible, and sustainable environment; 2) a more resilient and efficient economy; and 3) enduring social stability.

We might suggest that this highly improbable course of action is actually one you hoped to avoid, until President Trump intervened. Is it conceivable that you would publish this DEIS with the premise that the outcome is still unknown, relying on good faith evaluation of public comment such as ours, and due process, while President Trump has already dictated the outcome? If true, I urge you to do as former Forest Service Chief Jack Ward

Thomas implored: TELL THE TRUTH! Forsake the charade and tell it like it is. Even though Trump knows little and cares less of the decades-long struggle to create the "long-term, durable approach to roadless area management . . . that accommodates the unique biological, social, and economic situation found in and around the Tongass," it would at least be honest to let all concerned citizens know how and why he, and he alone, has dictated the outcome. No matter how distasteful, such documentation would obey the letter and spirit of NEPA.

/s/ Catherine Mater /s/ Jim Furnish

Catherine M Mater Jim Furnish

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