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Comments: Alaska Roadless Rule Exemption comments are attached

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November 25, 2019

USDA Forest Service

Attention Alaska Roadless Rule

PO Box 21628

Juneau, AK 99802

Dear U.S. Forest Service,

I attended the Roadless Exemption meeting in Ketchikan on November 5 and submitted some preliminary comments at that time. Since then I have read the draft EIS and have the following additional comments.

I support Alternative 6, the full exemption of the Roadless Rule for the Tongass.

Benchmarks

In 1989 the Forest Service prepared a document (Understanding the Past[hellip]Designing the Future) that revisited many of the Tongass management issues that had been made in the 1979 forest plan. That 1979 plan was the first forest plan established pursuant to the 1976 National Forest Management Act. Under that first management plan:

- * 36% of the forest was managed as wilderness
- * 6% was not given any management allocation
- * 16% was allocated to roadless area management
- * 17% was managed for a combination of uses including recreation and some timber harvest
- * 25% was allocated to intensive resource use and development, primarily for timber harvesting and mining
- * Under the 1979 plan, only 7% of the forest was scheduled for an annual timber harvest of 450 million board feet (mmbf) of net sawtimber

The 1989 document also established a series of benchmarks that estimated the amount of specific resources that the Tongass could produce and what effects that production could have on the other resources. Those specific resources and their benchmarks maximums were:

- * Wilderness [ndash] 15.8 million acres
- * Fish [ndash] 130 million pounds
- * Wildlife habitat capability [ndash] 91%
- * Recreation/Tourism [ndash] 4.6 million recreation visitor days (RVD)
- * Timber [ndash] 780 mmbf

Here are specific impacts on timber that the report indicated would result from maximizing each of the other resources:

- * Maximizing wilderness had the greatest impact on timber, limiting the annual timber harvest to 150 mmbf.
- * Maximizing fish limited the maximum timber harvest level to 580 mmbf.
- * Maximizing wildlife limited the maximum timber harvest level to 377 mmbf.
- * Maximizing recreation/tourism limited maximum timber harvest level to 370 mmbf.

In summary the agency's 1989 report concludes, other than maximizing wilderness acreage, which is effectively the same as leaving the Roadless Rule intact, a timber harvest level at or below 370 mmbf would not limit the maximization of any of the other resources on the Tongass [ndash] fish, wildlife or recreation/tourism.

Responsible Resource Development

The timber industry does not seek to harvest the maximum biological potential of the national forest timberlands to grow timber (which the 1989 document listed as a sustained yield of 1,950 mmbf annually). Instead, the timber industry seeks only to restore a healthy, viable forest products industry. In order to achieve that goal, our timber industry needs to restore full utilization of the timber we harvest. Currently, there is no local manufacturing facility which can utilize the pulp timber (utility logs) which comprises about 15% of forest. Those pulp logs are currently left in the forest to rot. Nor is there a local manufacturing facility that can profitably utilize very low-grade sawlogs. Similarly, there is no facility to utilize residual sawmill chips or the hog fuel from the sawmills, which comprise more than 40% of the fiber in the trees. Further, there are no economically log export markets for the products. Full utilization of the region's timber will require the restoration of a fully integrated manufacturing industry. In 2008, the Forest Service estimated that a timber harvest level of 342 mmbf would be needed to sustain a fully integrated manufacturing industry[1]. The current Roadless Rule prevents the Forest Service from considering that level of timber harvest. This should have been disclosed in the draft EIS and should be considered in the final exemption decision. A full exemption from the Roadless Rule would not by itself restore the timber supply we need, but it would give the agency the management flexibility to consider that goal in a future land management plan.

Page 1-5 of the DEIS states [ldquo]Roadless areas are important because of their wildlife and fish habitat, recreation values, importance to multiple economic sectors, inherent passive use values, traditional properties and sacred sites for local indigenous people, and ecosystem services values they provide. Passive use values represent the value that individuals assign to a resource independent of their use of that resource and typically include existence, option, and bequest values. These values represent the value that individuals obtain from knowing that expansive roadless areas exist, knowing that they are available to visit in the future should they choose to do so, and knowing that they are available for future generations to inherit[rdquo]. All of these uses and values [ndash] habitat, recreation, economic sectors, passive use values, etc. are addressed in the normal planning process. Further, Congress already identified and set-aside the areas deemed to have the [ldquo]best[rdquo] wilderness and roadless values.

All the remaining areas on the national forest should be actively managed for multiple-uses. Bypassing the normal planning process is an arrogant approach that says today's managers know best and will make unalterable decisions that prevent future managers and future generations from making their own land use

decisions based their values and knowledge.

Young-growth Timber Management

The National Forest Management Act requires that in most cases, young growth timber on national forests can be harvested only after the young growth stands have reached their maximum growth potential, which in Southeast Alaska is around 90 to 100-years. There are exceptions to this conservation rule and the Forest Service currently has a blanket authority to harvest up to 50,000 acres of young growth timber prior to the age at which the biological capacity of those young growth stands would be achieved. Harvesting young growth timber at about 65 years of age as the draft EIS discusses would reduce the potential young growth volume on the harvested lands by about half. This premature harvesting scheme will sustain a few vital logging jobs that would otherwise be lost, but it will not contribute to restoring year around manufacturing jobs. Another consequence of the early harvest schedule will be an increase in the amount of access roads that will be needed as well as doubling the acreage of timber harvesting necessary to achieve whatever timber supply goal is ultimately adopted. These consequences of prematurely harvesting young growth timber should have been disclosed in the draft EIS.

The products from small-diameter, young-growth manufacturing are low-value products that rely on large investments in highly mechanized facilities. There simply are not enough acres and volume of young-growth timber on the Tongass to sustain those facilities and to amortize the necessary investments. A successful transition to young growth harvesting will take more than 15-years and the existing old-growth industry must be maintained throughout the transition in order to keep and grow a skilled workforce for the future. This was always the plan, at least it was prior to the 2016 TLMP. That ill-considered plan is already failing and unless an exemption to the Roadless Rule is granted, we will lose what little industry remains. An exemption to the Roadless Rule should provide time to reconsider the 2016 land plan and devise a plan that can succeed.

Cumulative Effects

The cumulative effects discussion on page 3-154 states in part [ldquo]The amount of forest land in Southeast Alaska that is available for timber management has declined over the past century, largely due to Wilderness and LUD II designation by Congress, land selections by the State and ANSCA, land restricted by roadless designations, and land allocated to non-development LUDs in the current Forest Plan. This, along with mill closures and changes in timber markets, has contributed to a decline in timber harvest[rdquo]. That wording is a deceptive. The decline in timber harvest was a direct result of [ldquo]the amount of forest land in Southeast Alaska that is available for timber management[rdquo] and the mill closures have been a direct result of the decline in timber harvest. The markets did not cause the decline in the timber industry. The timber manufacturing industry sustained operations, through good markets and bad, for over 40-years and the Forest Service cost collection data since 2000 indicate the average market prices of Tongass timber have been rising for 17 of the last 19 years.

Unnecessary Land Use Restrictions

Page 3-109 of the DEIS states [ldquo]Several watersheds and VCUs in the Tongass have been evaluated for relative importance for several metrics relating to fish and wildlife. Included among these are conservation priority areas identified by The Nature Conservancy (TNC) and Audubon Alaska (Audubon Alaska and The Nature

Conservancy 2007), and the [Idquo]Tongass 77[rdquo] (T77)18 watersheds identified by Trout Unlimited. Audubon Alaska and TNC identified conservation priority watersheds that include high-value intact watersheds in primarily intact conditions and generally encompass the highest current ecological values within each province; these areas were recommended to be managed for intact ecological values and habitat productivity[rdquo].

The 2016 TLMP FEIS includes similar, vague reference to these land set-aside proposals from four environmental groups:

* Page 3-103 [ndash] 2016 TLMP FEIS

[Idquo]Additionally, based on internal scientific review in collaboration with others, 16 of these VCUs are considered high value watersheds that should be monitored to determine the likely impact to fish and wildlife habitat from young-growth timber projects[rdquo].

* Page 3-128 [ndash] 2016 TLMP FEIS

[Idquo]Tongass 77 Watersheds and TNC/Audubon Conservation Priority Areas

As noted in the Affected Environment section, there are a number of watersheds and VCUs, including the TNC/Audubon conservation priority areas, that have been evaluated by public, private, and agency groups and considered of importance for fish habitat quality and production[rdquo].

There was no detailed analysis or discussion of the merits of these two gigantic land set-aside proposals during the development of the 2016 TLMP. In fact, many Forest Service employees told me they were completely blind-sided by the last-minute inclusion of these environmentalist[rsquo] proposals. Not even a map of these so-called [Idquo]priority areas[rdquo] was provided by the Forest Service. Nearly a year after the 2016 TLMP FEIS and ROD, the Forest Service made a quick GIS analysis and reported that these two proposals set-aside an astonishing 3.77 million acres including 1.5 million acres of old-growth timber! That acreage represents over 20% of the entire Tongass and about 30% of all the [Idquo]productive old-growth[rdquo] timber on the Tongass! Even now no detailed maps or analysis of these so-called high-value lands have been provided and no explanation of why the existing forest plan standards and guidelines are not adequate for these lands. I searched the internet and downloaded a map of the Tongass-77 watersheds and noticed that some of the proposed set-asides appear to be mostly mountain tops and some selections appear to be simply selected to block access corridors. These [Idquo]priority areas[rdquo] should be unencumbered as soon as possible and then perhaps properly analyzed and reconsidered in a future land management plan.

Excessively Restrictive Conservation Strategy

Other than the Roadless Rule, the 1997 Wildlife Conservation Strategy has been the largest cause of reduced timber sale volumes and increased timber harvest costs over the last 22-years. The Forest Service Ranger District personnel identified these impacts long ago and the timber industry and others have repeatedly asked the Forest Service to address this issue. In 2007, the Southeast Conference hired a wildlife biologist (James A. Rochelle, Ph.D.) to review the conservation strategy.

Rochelle[rsquo]s report (attached) included the following conclusions:

* [ldquo]The plan is extremely conservative relative to the importance assigned to productive old-growth forest habitats. The influence of amount of old-growth habitat seems to be [ldquo]more is better[rdquo] as a way to minimize risk, rather than considering effects, risks and overall biodiversity conditions associated with retention at various levels[rdquo].

* [ldquo]Effects of changed amounts of productive old-growth forest on wildlife are presumed to be worst-case, and are based on concepts and assumptions that in some cases lack scientific validity or supporting data. The result is that the approach taken in the plan is precautionary to the extent of overemphasizing perceived negative influences of forest harvesting[rdquo].

* [ldquo]The TLMP doesn[rsquo]t directly consider the levels of existing reserves both inside and adjacent to the Tongass, in combination with those designated in plan alternatives, thus is overly-cautious with regard to risks to maintenance of wildlife and biodiversity. Even without considering other habitat contributions, overall productive old-growth levels are well above reported thresholds for maintenance of ecological integrity[rdquo].

* [ldquo]While not quantitatively addressed in the conservation strategy, restrictions on timber harvest on high hazard soils and karst lands will reserve an additional, unspecified amount of productive old-growth forest[rdquo].

* [ldquo]Other factors (legal and illegal hunting, trapping) are as important as habitat quality in determining populations levels for some species; while considered in the plan, the potential value of harvest regulation and access control in helping to ensure viability of a number of species, in concert with habitat management, is not fully addressed[rdquo].

* [ldquo]Habitat changes associated with forest harvest are temporary, with rapid recovery for variables such as amounts of edge and cover for hiding and dispersal; the plan contains limited recognition of these relationships or their contribution to habitat quality[rdquo].

* [ldquo]Silvicultural treatments have been shown to be effective on the Tongass in increasing amount of understory shrubs important as deer forage and habitat for small mammals and shrub-nesting birds and should be recognized for their current and future contributions to habitat[rdquo].

* [ldquo]Although geographic differences are not factored in, some species (goshawk, marten, wolf, brown bear) populations occur at viable levels in habitats containing substantially less old growth forest and greater levels of development than the Tongass. This suggests that habitat associations of species considered in the plan are in some instances less linked to old-growth than assumed in the plan[rdquo].

* [ldquo]Several assumptions relative to species - habitat associations which affect the adequacy of alternatives are incorrect; for example: non-federal lands in SE Alaska lands have zero habitat capability and there is a direct relationship between the amount of productive old- growth and marbled murrelet and flying squirrel abundance[rdquo].

* [ldquo]The focus on retention of the highest volume timber stands in the TLMP is based on the assumption that past forest harvesting targeted these stands (DEIS 3-133). However, for purposes of operational and economic efficiency, harvests prior to 1976 more typically involved all or portions of entire watersheds and the range of volumes associated with stands occurring there. After 1976 green-up strips were retained as a means of reducing harvest unit size as required by NFMA and a conforming USFS policy[rdquo].

* [ldquo]The ecological rationale for expanding the beach fringe to 1000 feet in width is not clear[rdquo].

* [ldquo]An adaptive management approach which assesses results of management actions as a means of adjusting practices through time would allow evaluation of alternatives that increase timber supply at low levels of risk to wildlife and biodiversity[rdquo].

Rochelle[rsquo]s report was ignored.

In 2013 the Southeast Conference commissioned a Natural Resource Management Consultant (DR Systems NW) to propose TLMP strategy to achieve both sustainability and improved profitability through strategic

planning, modern information systems. That report (attached) was also ignored.

During the 2016 TLMP process the timber industry addressed several specific elements of the Conservation Strategy that unnecessarily restrictive and costly. These were also ignored, and some of those same excessively cautious thresholds and habitat models are discussed in the Roadless Exemption Draft EIS. Here are just a couple of my concerns:

* Pages 56 and 57 of the Draft EIS discuss habitat fragmentation and a minimum safe threshold of 95% or more intact habitat which the document states was recommended by the same environmental groups that promoted the 3.77 million acres of [ldquo]priority areas[rdquo]. This 95% threshold seems excessive and a brief research of the topic suggests that a more reasonable threshold for fragmentation concern would be in the range of 30% to 50% intact habitat, not 95% (The National Center for Biotechnology Information, The American Association for the Advancement of Science, The Environmental Law Institute, and others). Rochelle, in his 2007 Conservation Strategy Review mentioned a number of researchers that came to a similar conclusion: [ldquo]While the relationships are complex, these authors concluded that maintaining habitat at greater than 60% of total habitat equates to low risk to biodiversity (i.e. a high probability that ecological integrity will be maintained) and that maintaining habitat at equal or less than 30% of total habitat equates to high risk (i.e. a high probability that ecological integrity will not be maintained)[rdquo].

* Pages ES-14 and 3-78 of the DEIS discuss a presumed decline in deer habitat capability resulting from timber harvesting. This assumption also leads to concerns for wolves that rely on deer as a critical prey and, since 1997 in reliance on that declining habitat assumption, the forest plan has set-aside more than a million acres of the best timber growing sites on the national forest. However, as discussed on pages 7 & 8 of the Alaska Forest Association POW-LLA project comments (attached), the deer habitat model consistently fails to match the empirical evidence. Alaska Department of Fish and Game deer hunter reports demonstrate that the areas with the most past timber harvest consistently sustain higher deer harvest levels and hunter success ratios than pristine areas, even 50 to 60 years after timber harvest.

The 2001 Roadless Rule negates the planning process that Congress enacted in 1976. The rule also negates the multiple-use mandate on most of the Tongass National Forest as well as the promises made to continue managing some of the national forest for a timber supply that would enable year-around manufacturing employment. Thank you for undertaking this effort to provide Alaskans relief from the Roadless Rule.

Sincerely,

Owen Graham

[1] 2008 Tongass Land Management Plan Record of Decision, page 36.

[See attachment containing the following technical resource: " Rochelle Biological Review of 2008 TLMP Conservation Strategy]

[See attachment containing the following technical resource: "A Discussion of an example of the Triple-Bottom-Line Management Strategy Approach on the Tongass National Forest"]

[See attachment containing the following technical resource: "Alaska Forest Association Prince of Wales Landscape Level Analysis Objections"]

[Position]