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Title:
Comments: Roadless comments

Please see attached comments from Alaska Forest Association

Kind regards,

Juaneta Cannon

Alaska Forest Association

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December 16, 2019

USDA Forest Service

Attention Alaska Roadless Rule

PO Box 21628

Juneau, AK 99802

Dear U.S. Forest Service,

The Alaska Forest Association supports Alternative 6, the full exemption of the Roadless Rule for the Tongass, in the draft EIS for the Alaska (Tongass) Roadless Areas Ruling. The Alaska Forest Association offers these comments in support of a full Tongass exemption.

Timber Manufacturing

In order to restore a fully-integrated manufacturing industry the Tongass must supply a much larger and more

reliable volume of timber. In the 2008 Tongass Land Management Plan the Forest Service acknowledged that an annual timber supply of 342 million board feet would be needed. This is far less than was promised by Congress in 1980 and it is far less than could be sustained in the timberlands outside of the congressionally designated wilderness, national monuments and other congressional non-development land use designations. Here is the language from pages 34 and 35 the 2008 TLMP Record of Decision that describes the need for full manufacturing integration:

"An integrated forest products industry is one that includes processing facilities and markets for all types of logs from timber harvest operations conducted in the area, and for byproducts such as chips that result from processing those logs into lumber or other products. Such integration substantially enhances the economic efficiency of a regional industry as a whole, and the competitive position of all producers relative to their counterparts in other areas. Southeast Alaska has not had an integrated industry since the closure of the region's pulp mills in the 1990s. Those mills processed utility logs, for which little or no local market has existed since those mills closed. Utility volume must still be cut down, primarily for safety reasons. The lack of a local facility to process utility volume means timber purchasers are required to cut and handle logs that they must often leave in the woods. Thus, some of the material harvested is not utilized; producers' operating costs are increased per unit of material they do process; and the industry's competitive position is diminished.

Consequently, the lack of an integrated industry increases the economic incentive to harvest high-volume timber stands disproportionately in order to make timber sales economic.

The lack of facilities in Southeast Alaska to process low-grade and small-diameter material also makes it more difficult to conduct commercial thinning of young-growth timber stands. Because funding for pre-commercial thinning projects has historically been insufficient to meet the need, commercial thinning is the most feasible way to improve wildlife habitat quality and restore other ecological values in areas previously harvested. Some of these areas have significant restoration needs because they were harvested decades ago under standards considerably less protective than they are today. The absence of processing facilities in Southeast Alaska for the small-diameter material from these stands makes such restoration more difficult to accomplish.

Further, an integrated industry could enhance the quality of life in Southeast Alaska by providing for a sector of sustainable, year-round, family-wage jobs in rural, resource-dependent communities.

When added to existing industries such as recreation and nature tourism, commercial and recreational fishing, and government employment, an integrated wood products industry could contribute to a more stable social infrastructure. This includes schools, hospitals, libraries and various service industry amenities like hotels and restaurants that support a greater quality of life for Alaska residents.

Consequently, re-developing an integrated industry is an important part of the ecological, economic and social components of sustainability. Timber production has been one of the missions of the National Forests since

enactment of the Organic Administration Act in 1897. If we are to sustain this industry in Southeast Alaska, we must provide opportunities for local processors to expand and integrate enough to compete more effectively in world markets. Integration would also enhance ecological sustainability by reducing the amount of material now left in the woods and facilitating the transition to an industry based more on young-growth stands. For all these reasons, I believe it is important to provide opportunities for the re-establishment of an integrated forest products industry in Southeast Alaska, capable of processing all types of timber products available from the Tongass.

Having determined that it is important to provide an opportunity for the timber industry to become more integrated, the question arises as to what supply from the Tongass National Forest would be needed to accomplish that objective. There are many sources of information on this subject, and I considered them all. The Brackley et al. study indicates that a partially integrated industry would generate a market demand for timber from the Tongass of 204 MMBF in 2022, and a fully integrated industry would demand 342 MMBF.

Responsible Resource Development

The Forest Service could supply a fully integrated manufacturing industry in perpetuity by harvesting less than 10% of the forest over a 100-year rotation. That small percentage would include the existing young growth stands and that harvest level could be sustained without limiting fish and wildlife habitat, tourism, recreation or other users of the national forest. The Forest Service 1989 Benchmarks document indicated that the national forest could sustain a harvest level of up to 780 million board feet annually without limiting other uses of the forest.

All the remaining areas on the national forest should be actively managed for multiple-uses. Bypassing the normal forest management planning process via application of the 2001 Roadless Rule to the Tongass 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 on their values and knowledge.

Silviculture issues

The closer the Forest Service adheres to the Culmination of Mean Annual Increment with its young growth management, the fewer acres will be needed to sustain the requisite harvest level. Thinning young growth stands can help achieve certain management objectives but maximizing the timber yield of the managed stands can best be achieved by even-age management. The Forest Service documented the many benefits of even-age management in a 1972 brochure:

"A forest meets many needs while it is growing to maturity: wildlife food and shelter, watershed cover, recreation, aesthetics, to name a few. And when the forests are mature, harvesting some of them by clearcutting will start

the cycle all over again, This managed and supervised harvest follows nature's methods of renewing a forest"[1].

Even-age harvesting also allows additional heat and light to reach into the forest and thus increases the growth rate for the young growth stands, which further minimizes the number of acres necessary to sustain the timber industry. In contrast, harvesting young growth timber prior to CMAI will increase the acreage of timber necessary to achieve the same volume. This results in higher timber harvesting costs as well. Harvesting young growth prior to CMAI also wastes the time and money invested in these timber stands by prematurely harvesting trees that have not yet matured and thereby truncating the public's opportunity for a return on its investment in these natural resources.

Unnecessary Land Use Restrictions

The draft EIS states "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 "Tongass 77" (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"[2].

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

* Page 3-103 - 2016 TLMP FEIS

"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".

* Page 3-128 - 2016 TLMP FEIS

"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".

In truth, 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. No map of these so-called "priority areas" was provided by the Forest Service in either the draft or the final 2016 TLMP EIS. At AFA's request, nearly a year after the 2016 TLMP FEIS and ROD, the Forest Service finally made a quick GIS analysis and reported that these two last-minute proposals

set-aside 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 "productive old-growth" timber on the Tongass. Even now no detailed maps or analysis of these so-called high-value lands have been provided nor any explanation of why the existing forest plan standards and guidelines are not adequate for these lands. These "priority areas" should be unencumbered as soon as possible and then perhaps properly analyzed and reconsidered in a future land management plan.

Excessively Restrictive Conservation Strategy

In 1997 a vastly expanded Wildlife Conservation Strategy was adopted as part of the 1997 TLMP. The Forest Service Ranger District personnel have repeatedly told us that this excessively cautious approach to wildlife habitat has been the single largest cause of reduced timber sale volumes and increased timber harvest costs. In 2007, the Southeast Conference hired a wildlife biologist (James A. Rochelle, Ph.D.) to review the conservation strategy and prepare a report for the 2007 draft TLMP EIS.

Rochelle's report included the following conclusions:

* "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 "more is better" as a way to minimize risk, rather than considering effects, risks and overall biodiversity conditions associated with retention at various levels".
* "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".
* "The TLMP doesn'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".
* "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".
* "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".
* "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".
* "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".
* "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".
* "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".
* "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".
* "The ecological rationale for expanding the beach fringe to 1000 feet in width is not clear".
* "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".

Unfortunately, Rochelle's report was ignored and the Forest Service failure to implement its own timber sale targets continued, resulting in even more timber industry layoffs.

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. This particular strategy is one that has been used to successfully manage millions of acres of timberland around the world. Unfortunately, that report was also ignored.

During the 2016 TLMP process the timber industry addressed several specific elements of the Conservation Strategy that are 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 "priority areas". This 95% threshold is excessive and should not be employed. Rochelle, in his above-discussed 2007 Conservation Strategy Review, mentioned a number of researchers that came to a much less restrictive conclusion: "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)".
* 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 purported 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 Objection comments, which you possess but which are excerpted below, the deer habitat model consistently fails to match decades of empirical evidence[3]. 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 national forest 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 sustain year-around manufacturing employment. The timber sale program on the Tongass has declined by more than 90% since 1990 and this decline continues. The industry has lost more than 90% of its employment and manufacturing infrastructure and that decline has continued. The Forest Service has been able to offer and sell only about 13 million board feet of mature timber over the last three years and the only significant timber sale that has been prepared is stalled in litigation. The Forest Service must finally recognize that the past, overly cautious approach to managing the timber supply hasn't worked. Fully exempting the Tongass from the 2001 Roadless Rule is a good first step to providing an adequate, reliable timber supply.

Thank you for undertaking this effort to provide Alaskans with relief from the 2001 Roadless Rule.

Sincerely,

Alaska Forest Association

Owen Graham

Executive Director

Alaska Forest Association

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[1] Clearcutting in coastal Alaska? Why? USDA Forest Service, J-72-10

[2] Draft Roadless Exemption EIS, page 3-109.

[3] Page 3-99 of the POW-LLA FEIS asserted that six of the WAAs will suffer a "change in abundance and distribution of deer[hellip]as deer hunter efficiency and success decrease in areas that transition into stem exclusion". However, that assertion disregarded the empirical evidence to the contrary - the deer populations in these six areas appear stable long after the assumed "stem-exclusion" age of 25 years:

*
* WAA 1214 (Polk Inlet vicinity) was primarily harvested between 1986 and 1992. More than 5,000 acres were harvested 26 to 32 years ago yet still the hunter success in that WAA remains high.
* WAA 1315 (Thorne Bay vicinity) was primarily harvested between 1961 and 1988. More than 30,000 acres were harvested 30 to 57 years ago and yet hunter success remains very high year-after-year, long after the "stem-exclusion" that the FEIS asserts begins after 25 years.
* WAA 1317 (Hollis-12 Mile vicinity) was harvested primarily between 1959 and 1972. More than 6,000 acres were harvested 46 to 59 years ago and yet hunter success remains very high year-after-year.
* WAA 1318 (Craig-Klawock-Big Salt) was harvested primarily between 1980 and 1995. Probably some 40,000 acres of mostly private land was harvested 23 to 38 years ago and yet hunter success in the area remains very high year-after-year.
* WAA 1420 (Ratz Harbor- Eagle Creek vicinity) - 3,000+ acres were harvested primarily between 1959 and 1971; more than 3,000 acres were harvested 47 to 59 years ago and yet hunter success remains very high year-after-year.
* WAA 1422 (Staney-Naukati vicinity) - more than 8,000 acres were harvested primarily between 1971 and 1987; more than 8,000 acres were harvested 31 to 47 years ago and yet hunter success remains very high year-after-year.

Page 3-98 of the POW-LLA FEIS stated "Hunter success rates may be lower in WAAs 1214, 1315, 1317, 1318, and 1420 due to the estimated deer harvest exceeding 10 percent of the estimated DHC (see Table 11)." The State ADF&G sent the Alaska Forest Association the actual harvest records for 2011 through 2017 for 36 WAAs on Prince of Wales. Those records indicate that deer harvest success in the six referenced WAAs is within 3% of the deer harvest success for the remaining WAAs. In other words, there is no significant difference in actual hunter success in these six areas over the last seven years. Instead of basing the analysis on actual hunter success records, the Forest Service employed a false presumption, which now infects the draft EIS for the Alaska (Tongass) Roadless Areas rulemaking, that appears to be based on a model that indicates Deer Harvest Capability is lower in the six referenced areas.

[Position]