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Dear Erin,

Thank you for the opportunity to review and comment on the TLMP Draft Assessment. This letter constitutes majority agreement comments and recommendations on behalf of the membership of the Southeast Alaska All-Landowners' Group (LOG) related to the Draft Assessment. Comments are mainly focused on the Timber Resources section, although Assessment topics exhibit some overlap, and some comments reflect that reality. While federal employees regularly participate in the LOG, no federal employee contributed to, or participated in the process of developing the comments contained herein.

The Draft Timber Resources Assessment is a mostly comprehensive and accurate statement of current conditions relating to timber resources and the timber industry on the Tongass. As the primary document which will influence "need for change" decisions in the ongoing TLMP revision process, the Timber Resources Assessment deftly illustrates that while active timber management and the timber industry are vital to the economic, ecological and social well-being of the Forest and its dependent communities in the region:

*The Forest Service has so far substantially failed to meet Young-Growth Timber Management Goals and Objectives contained in the current TLMP (2016). Please see the TTC's final report detailing Forest Service attainment of Young-Growth management Goals and Objectives (Tongass Transition Collaborative 5-Year Review of the 2016 Tongass Land Management Plan Amendment -Feedback and Suggestions for the Path Forward, August 28, 2023).

*Despite its obligation under TTRA to supply timber to meet industry demand, both annually and for the planning cycle, the Forest Service has substantially failed to prepare and sell a regular, reliable volume of commercial timber, authorized under the current TLMP, sufficient to meet either industry demand for timber or to maintain the current timber industry in SE Alaska. From 2015 to 2030, annual industry demand ranged from 40.8 MMBF to 76.4 MMBF, and from 2017 through 2023, annual industry demand ranged from 45 MMBF to 58 MMBF. From 2017 to 2023, the Tongass sold an average of 8.2 MMBF annually, and in 2023 and 2024 only sold 3 MMBF each year; the current PTSQ is 46 MMBF for the first decade, and 71.8 MMBF for the second decade.

*Since 1979, and over the course of four successive Forest Plans, the acreage designated as suitable for commercial timber production and harvest has steadily diminished from 2.4 million acres to 0.56 million acres.

There are currently an estimated 466,000 acres of Young-Growth timber stands on the Tongass, but only slightly more than half of that acreage is estimated to be within areas designated as suitable for commercial timber production and harvest; the total acreage scheduled as suitable, including both Young-Growth and Old-Growth is currently 326,623 acres, representing approximately 3% of total Tongass acres.

The Assessment mostly fails to recognize or appreciate the fact that for the next few decades, the Tongass contains the only economically viable Young-Growth commercial timber stands necessary to sustain the current industry in SE Alaska, and that all other regional landowners in the region are necessarily relying on the Forest Service to maintain an industry so harvest on non-federal lands will be possible once the non-federal Young-Growth stands reach a condition of economic viability. Should the current industry collapse due to lack of timber supply, which is a distinct possibility, the future of forestry, and the economic future of all non-federal forest lands in the region will be cast into uncertainty since it is unknown if or when a new industry might emerge, and what timber markets, especially export markets, might be available. Most non-federal forest managers in the region have made significant investments in forest management, Young-Growth stand treatments, and in workforce development in anticipation of future timber management and commercial harvest opportunities; without a viable industry those investments will not be able to yield positive economic returns resulting from timber harvest. Without a viable timber industry, the ability to provide active forest management, including restoration activities, will be more expensive and more challenging; many projects may not be economically possible without a skilled forest workforce.

Because the Assessment will inform future planning decisions about the "need for change", the LOG membership offers the following comments and recommendations:

*The Forest Service should carry the TAC-developed Young-Growth Management Goals and Objectives contained in the current TLMP into the future revised TLMP, and make whatever adjustments are necessary to the Tongass Young-Growth timber program to meet them. For harvest of either Young-Growth or Old-Growth, maintain the 100-acre maximum harvest opening size, and maintain and prioritize the even-aged harvest prescription. After 2031, request a CMAI exemption for all future harvest of Young-Growth timber to provide flexibility in rotation time, and to allow industry to respond to market conditions and preferences. Based on modelling of Tongass Young-Growth data, a rotation period of 60-80 years provides economic timber with greater deer habitat benefits than longer rotations.

*The Tongass should make whatever adjustments are necessary to its timber program to successfully prepare, offer and sell, at a minimum, timber volume between 46 MMBF and 71 MMBF of commercial timber volume annually. The Forest Service should continue to work with its partners to implement more GNA timber sales, and to take advantage of capacity and expertise outside of the Forest Service, especially considering the recent significant reductions to its workforce. The current GNA Master Agreement between the Forest Service and the Alaska Division of Forestry expires in 2026; it would be desirable to enter a new MA before the current one expires.

*Maintain, at a minimum, the current acreage of Young-Growth timber stands designated as suitable for timber production and harvest and consider revisions to existing Standards and Guides to significantly increase the suitable acreage of Young-Growth timber stands; in total, the Forest's acreage of Young-Growth timber stands (466,000 acres) represents less than 5% of the Tongass' forested acres. 5% of the Tongass' forested acres is the minimum "suitable" acreage industry has long maintained is necessary to sustain it. Managing 5% of the Forest to provide a sustainable Young-Growth forest products industry seems both reasonable and desirable within the context of multiple use management; harvest and thinning are the most effective treatments to improve wildlife habitat conditions in stands in the stem-exclusion phase of development. Maintaining an industrial scale timber industry is critical to maintaining a diversified economy in SE Alaska, to providing jobs to rural communities. Intermediate stand treatment (PCT) and rotational harvest are critical to improving deer habitat in Young-Growth stands; more deer on the landscape are needed for subsistence users. From a climate perspective, having a

mosaic of Young-Growth stands exhibiting a diversity of age classes and species composition, on a variety of growing sites, will only improve overall forest climate resiliency across the landscape.

*Under the Tongass Young-Growth II CCSA, an inventory and analysis of all non-federal Young-Growth stands in SE Alaska (Annette Island to Yakutat) is nearly complete; the final report will provide the acreages and predicted (modelled) flow of Young-Growth timber stands from all ownerships (federal, other public, trust, and private forest lands) in SE Alaska. Project findings and maps detailed in the final Report should be considered by the Forest Service in developing the revised TLMP.

*Continue to integrate resource restoration projects in close coordination with commercial timber sales, especially Young-Growth timber sales. Ideally, projects to recondition roads, and restore/improve forest conditions and fish and wildlife habitat should be funded with timber sale receipts; Plan Standards and Guides should encourage, not prohibit, removal and utilization of commercial forest products in conjunction with restoration treatments. There should not be either a "restoration economy" or a "timber economy", but rather the two programs should be fully integrated to function together, concurrently, in the same geographic basin along with the expectation that sale of commercial forest products will at least defray the cost of restoration treatments and projects.

*Provide incentives to industrial scale timber sale purchasers to sell a percentage of the volume they harvest from each timber sale to small mill owners lacking road building and logging capacity.

*Continue to support existing Community Forest Partnership crews, and work with partners and communities across the Forest to establish more crews trained to perform resource management work on the Forest and on other public and private forest lands. Continue to support ongoing efforts to develop a forest technician training program in Alaska.

*Continue to perform PCT in Young-Growth stands for forest health and climate resiliency, timber production, and wildlife habitat purposes.

*Until there is industrial scale Young-Growth timber domestic manufacturing capacity on the Forest, the Forest Service should continue to authorize the export of timber. The greatest impediment to an industrial scale local processing facility for Young-Growth is the lack of a reliable timber supply; industry will only be willing to make those sorts of investments if it can rely on the Forest Service to regularly and reliably supply a sufficient timber volume on an ongoing annual basis. Continue to assist industry to adapt and re-tool to a Young-Growth timber economy, including in both harvesting and manufacturing technologies. Support funding for a study of Tongass Young-Growth timber and lumber to determine the structural properties and potential value-added products which could be derived from Tongass Young-Growth timber. Continue to support wood energy/biomass initiatives and projects throughout SE Alaska.

*Continue to collaborate with stakeholders and partners, including through Forest Service participation in LOG meetings and initiatives, to identify the critical network of roads and forestry infrastructure that will need to be maintained to provide access to Young-Growth timber and resource restoration projects, on both federal and adjoining non-federal lands.

*Continue to support and maintain initiatives that further the practice of forestry and silviculture in SE Alaska.

Sincerely,

Mike Cooney, LOG Project Manager

CC:

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