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First name: Joseph

Last name: Mehrkens

Organization:

Title:

Comments: Thank you for the opportunity to comment on the Central Tongass Project (CTP) "Condition Based" analysis. Please include my comments in the planning record.

First and foremost, the whole premise of a "condition based" NEPA analysis is contrary to the long-term NEPA practice/intent of publically disclosing site-and time specific impacts. That is, to estimate the specific consequences of real, on-the-ground timber operations (timber sale layouts). Only then can the public begin to understand the schedule of timber harvesting and the adverse tradeoffs to other forest uses. In contrast, the Forest Service is dodging the age old NEPA practice of analyzing site specific actions with their home spun interpretation of NEPA. This appears to be an end run to clear actual timber sales within some nebulous, non-site specific context, i.e., the concept of timber harvesting in aggregate over time, somewhere within a broad landscape and with the added flexibility to respond to changing conditions. This is ultimate license to do anything, without meaningful disclosure and is the epitome of obfuscation of planned public agency actions. Under NEPA your agency has wide land-management discretion - no matter how wrongheaded or bone-headed it may be. Nonetheless, you still have the responsibility/requirement to disclose the timing and location of specific plan actions - including cumulative impacts over time. To do less is to purposefully leave the public clueless as to the real future consequences.

One specific failure the "Condition Based" analysis goes back to my days on the Tongass Futures Roundtable (TFR). As a former Region 10 Regional Economist, The Boat Company hired me as a consultant to represent them as an alternate member at the TFR. At that time, State Foresters were enlisted by your agency to look at the existing timber base over large areas included in the Central Tongass Project (CTP) landscape. The intent was to find ways to reduce the costs in offering timber sales and thus "to identify more economic timber." They found that much of the timber base was economically marginal - even under your narrow definition of only having to provide positive stumpage. Note, that no analysis of total benefits exceeded total costs was even completed or contemplated. Simply, their conclusion was that most of the remaining old-growth in the timber base was infeasible. Notwithstanding their conclusion, the CTP portrays that over a quarter billion board feet of timber is indeed feasible - again by only using a positive stumpage value as the economic screen and again by ignoring where total timber benefits exceed total timber and other resource protection costs. This raises several issues. First, why do the implied timber values in the CTP differ so widely from the TFR findings? Second, if this discrepancy can be somehow rationalized, what is the underlying information, data sources and assumptions used in the CTP analysis? If this information exists, it needs to be explicit in the CTP analysis documents. Also note, there is overwhelming evidence over two decades of five sequential rosy timber demand forecasts that never materialized. Moreover, these rosy forecasts were generated under deteriorating (not improving) timber demand. Third, regardless of the Forest Service's narrow and constrained definition of timber economics (positive stumpage and rosy future demand) - the analysis of total benefits and costs still needs to be done to fully disclose the consequences of future planned harvesting. This broader and comprehensive analysis must include all timber related costs (NEPA planning, timber sale preparation, timber sale administration, road building/maintenance, and environmental protection. And, it needs to explicitly estimate the resource tradeoffs between timber and other multiple uses of the Tongass.

The comprehensive economic analysis I'm referring to is not rocket science, but rather a well-defined set of procedures and methods that have been conducted across on all national forests -- except the Tongass and Chugach. It is well established by other agencies and external interest groups that total costs for Tongass timber far exceed the benefits. That is true across the Forest and thus the CTP. To promote large scale timber harvesting regardless of this reality may be within your agency's discretion, but it still requires full public disclosure to reveal the magnitude of the market failure you seek to achieve.

Another flaw in the unconventional "Condition Based" analysis is the inability to even determine when and where actual logging or road construction will occur -- let alone determine the cumulative impacts to other resources. Going back to my past Forest Service career, I recall similar 30,000 foot NEPA analyses that were attempted to

clear timber under the long-term, 50-year timber contract sales. This approach was debunked by opponents and ultimately rejected by the courts. Simply, you need to do your complete home-work with no short-cuts. The CTP's attempt to "evaluate" proposed timber harvesting under some non-specific umbrella is not free license to clear real timber sales under the less rigorous EA analyses or CE exclusions. Consequently, the "condition based" grossly obfuscates timber impacts and buries it in the cloak of other resource gibberish. The lack of site specific consequences of feasible planned actions is just poor public policy.

Clearly the CPT is a vehicle to incrementally relax protections for other forest resources in order to increase the timber base having a positive indicated stumpage. The most blatant example is the proposed relaxation of scenic quality standards. There is no rationale to relax these standards on the basis of new information, research or current needs inventory. Moreover, this effort flies in the face of common knowledge of rising demand for tourism. To the contrary, the rationale to relax scenic quality standards appears only to increase CTP timber base. Only an analysis of total benefits and costs can identify (and disclose) the economic tradeoffs between the CPT timber base and competing scenic values.

Please note, the CTP should evaluate total benefits and costs for all effected forest resources since this was not accomplished in the Forest Plan, the Forest Plan Amendment. A comprehensive economic analysis of all resources has been treated as a existential threat by your agency - I suspect since it significantly change public opinion about Tongass management. Nonetheless, the Forest Service can not have it both ways to avoid a comprehensive economic analysis at the macro and micro levels. However, the resistance to this broad economic analysis is long standing, despite the facts that the agency has the tools, know-how and ability to conduct such analyses. These commonly accepted planning requirements are well established under the Resources Planning Act and NFMA of the 1970s. Every national forest has implemented these planning requirements -- except the Tongass and Chugach NFs. To the contrary, the Tongass has been consistently and unjustifiably portrayed as somehow exempt from these national planning standards -- even though the public would greatly benefit from it.

The CTP "Conditions Based analysis exposes the transition to young/2nd growth as a slow walk strategy. The CTP, as well as, the recently approved Prince of Wales Landscape Level Assessment simply facilitate business as usual for old-growth logging. I was at the TFR in 2001, in Craig when Regional Forester Beth Pendleton announced the transition policy to Tongass young growth. While I do not recollect her pronouncement as meaning immediately, the clear implication was to start immediately and complete the policy in the near future. However, the Forest Service has rejected the spirit and intent of this young growth policy. Old-growth timber is still harvested on a large scale and the Tongass NF is the last national forest to continue this destructive practice. While the recent Forest Plan Amendment was designed in part to phase in young growth harvesting, only token 2nd growth efforts have been made to date and the bulk of the transition has been slow walked (delayed). In fact, the Forest Service sprinkles a small amount of the best existing high volume 2nd growth in new timber sales from areas the was the most productive old-growth stands in the 1950s and 1960s. In contrast, the transition to the "wall of wood" (coming from average productively stands harvested during the 1970-1990s -- has been conveniently put off for 15-30 years - and not by coincidence when the scheduled old-growth timber will be liquidated anyway. While the CPT tries to put the nail in the old-growth coffin -it cannot do so without full public disclosure - which is lacking to date.

The CTP is also disingenuous to other forest dependent industries. The CTP masks two lopsided taxpayer subsidies to just two timber large scale operators. More important, one of these operators has also been accused of wrong doing via a government audit. Government investigators/auditors allege that Viking Lumber high-graded Forest Service timber and cost the taxpayers millions dollars in lost stumpage. The resolution of this audit is still pending and appears delayed for unknown reasons.

Lastly, the highest and best use of Tongass timber - especially old-growth - is to ameliorate climate-change. Climate change is real and more apparent in Southeast - especially with degraded fisheries habitat and diminished commercial fish production. The Tongass sequesters more carbon than any other forest in the nation and is recognized as a national asset. Again, the CTP analysis needs to evaluate total benefits and total cost of all resource uses - including carbon sequestration. Any adverse impact to carbon sequestration due to CTP timber harvesting needs to be included the CTP analysis and disclosed to the public.

Thank you for the opportunity to comment and again I request these comments be included in the planning

record. I do remember my IDT days well.