

Data Submitted (UTC 11): 9/16/2019 11:20:49 PM

First name: Bill

Last name: Tremblay

Organization:

Title:

Comments: I have several comments related to the draft Central Tongass Project EMS,

1) I believe any attempt to amend the Forest Plan to adopt lower Scenic Quality Objectives to allow more "efficient" evenaged management violates federal laws in several ways.

- Scenic (visual) quality objects are a resource specifically identified by law as neediness protection (please read your manuals and direction for the management of this resource to note all of the specific laws; NFMA,etc).

- The management of the timber resources on the Tongass is directed by ANILCA (as amended by TTRA) to seek to meet market demand. At no point does this direction points management to compromise or elevate the production of timber sales over the legal protection or management of other resources.

- The evaluation of the Socioeconomic impacts related to the potential relaxing the Scenic Quality Objectives is inadequate. Potentially impacting thousands of outfitter or guide businesses in favor of a handful of timber related jobs makes no sense.

2) Timber management on the Tongass isn't a mandate but is subject to market demands (as previously stated in my comments and in ANILCA as amended by TTRA).

- In 2016 the Government Accounting Office found fault with the execution and administration of three Tonka and Big Thorne (Timber/Stewardship) Sales. To date; the Forest Service has not provided the public a sufficient response regarding the accountability regarding the lack of contract enforcement, the fiscal losses by the government for allowing the timber operator not to perform, or the lack of performance under the contract to (fund) complete restoration projects anticipated through the contract. In general terms; why is there any deference given to timber management when there is no defense for how poorly managed this resource is?

- Identifying Timber Analysis Areas all the way to the shoreline for most districts provides little assurance areas used by the public or businesses will merit protections. (Page 3-282 notes priority travel routes "may" observe more harvest activities potentially negatively affecting their recreation experience. WHY?)

3) Recreation

- The document is ambitious regarding the demolition and building of cabins and shelters in the project area. While hopeful; I doubt this is realistic. I suggest comparing the next 15 years against the accomplishments of the last two decades to give a better sense of your potential success. (How many structures have you actually eliminate? How many new ones have been constructed? Are you really building new recreation cabins or replacing old ones?)

- I'm hoping the optimism for doing this new recreation work isn't based on money generated by timber receipts? Given the failures of the Tonka and Big Thorne projects (or not selling the last sale offered), it would seem hope of generating the funding needed through additional timber projects is misplaced.