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Comments: Comments on Central Tongass Project Draft EIS

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These are comments and objections to the Central Tongass Project. This project covers over 3.5MMM acres out of this area about 1.2MMM acres can be used to produce timber sales. Of this 1.2MMM acres over 400M acres is in Land Use Designations that have restrictions that makes the timber in these areas uneconomic for timber production. This leaves a little over 800M acres that can be used for timber production, but these timber production areas are encumbered by requirements that can result in as much as an 80% fall down. This results in a plan in an area containing 642MMBF that has a target production of 150MMBF.

Using the information provided in the draft and the current Forest Service appraisal data and current experiences information an appraisal of the plan was made that verifies the fall down and deficit economics of the 10 areas in the plan. Even with log export all 10 areas in the plan are deficit.

A second appraisal to improve the economics by using the target sale volume of 150MMBF, eliminating the helicopter logging, using only conventional logging with 60% cable and 40% shovel and a volume per acre of 20MBF was made. This results in making 4 of the 10 areas non deficit and 4 above breakeven and 2 of the areas still deficit. This means that only 4 of the 10 areas would be likely to receive bids.

This second appraisal will not work if the helicopter volume in the draft is all logable only with helicopter. If sum of the helicopter is being designated helicopter for visual purposes and could be logged by conventional yarding by dropping the visual requirements the target volume could be achieved with lower yarding costs.

The deficit result of all the areas in the plan is an expected result. Projects of the past have experienced 75 to 80% fall downs the Wrangell project had 90% fall down and now the result of this project is evidence for change. It is time to modify the Forest Plan so that a viable timber sale program can once again be achieved. One way to make changes, that has been suggested before, is to establish a Timber Land Use Designation that is designed to manage areas in a way that will provide economic sales.

Without changes to the current TLMP The Forest Service will continue to fail in producing economic projects.

Thanks for the opportunity to comment.

George Woodbury