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Comments: Please accept these brief comments on the Draft EIS Vol. I for the Central Tongass Project:

If a modified alternative is not a possible choice, I favor Alternative 3. Unlike the Lower 48, Tongass Timber Sales are below-cost sales, therefore "need for meeting a timber target is a questionable goal. In fact, in the Lower 48, below-cost sales are illegal according to regulation and standards and guidelines. Ex-Forest Service Chief Mike Dombeck highlighted this fact in a recent Los Angeles Times opinion piece:

<https://www.latimes.com/opinion/story/2019-09-06/tongass-trump-logging-national-forest>

Though the document initially stipulates a 150 MMBF harvest over a 15 yr period, analysis of Issue 1 raises the potential harvest amount to 230 MMBF. Looking at historical harvest and processing projections found on the Tongass NF website (latest data appears to be 2004) actual processing was about one-tenth of the projections for ALL mills. How has the analysis been improved, and if so, why is it not found on the Tongass website? Why should the public or logging industry have confidence in the projected numbers, when the Tongass has consistently over-estimated actual demand?

The Tongass NF consistently overvalues timber harvest and undervalues the cumulative impacts of recreation and tourism on the region as a whole. Timber harvest, because of the localized intensity and resource impacts, is largely perceived as a negative by those not employed in timber-related businesses. Rather than subsidize a timber industry AND recreation, wildlife and other resources, it makes sense to focus on those economic sectors that provide the biggest impacts to the region.

Given the estimated accuracy of the Size Density Model as being only 60-80 percent correct (Caouette and DeGayner, 2008), it appears land capability may not actually meet "need" stated in the analysis document.

While my comments may be deemed not specific enough to the project, I would argue they speak to "need", which in this case appears to be incorrectly identified. A reasoned analysis of the Southeast Alaska economy can be found in Rain Coast Data's "Southeast by the Numbers 2018", which highlights the tourism industry-- including the increase in visitation and in sector employment vs. that of the timber industry. On page 4 of the analysis, a regional overview shows that the Visitor Industry and the Seafood Industry each exceed the value of the combined "Info, Timber, Warehousing, Utilities, and Transport" sector of the regional economy, timber alone comprising less than 4%. Please weight "need" in your analysis with other regional factors for a more balanced assessment.

In 2016, the Alaska Journal of Commerce carried an article entitled "Industry: Tongass timber forecast flawed". In it, Owen Graham of the Alaska Forest Association acknowledges that the value of young-growth would be improved greatly if allowed to age another 30 to 90 years. Forest Service specialists have said the same for years. As a former intensive management forester on a forest harvesting up to 135 MMBF per year, I see the gyrations a 16.9 million acre forest goes through for an annual average harvest of less than 25 MMBF as being simply uneconomic. Also for the record, much of what the Tongass is terming "young growth" would better be classified as "second growth", to be consistent with terminology used in other locales and across the industry. "Young growth" implies a tree of relatively young age, and in many cases on the Tongass, the timber included in this definition is over 90 years old.

Especially because of the importance of the Visitor and Seafood Industries to the Southeast Region, the proposed "Project-specific Forest Plan Amendment" lowering Scenic Integrity Objectives for the reasons stated in Chapter 1, page 7 of the analysis are unacceptable and should not be adopted.

Finally, unless the Tongass NF can assure that road mitigation will actually be completed, unlike situations that have occurred in the past where partial work was accepted as the completed contract, projected road-building puts fish and wildlife resources at risk. What assurances are there that road mitigation will be completed as

projected in this document, especially given the lack of specificity?